

Respondent: 50 / 1 Name: Ms Tricia Golinski Organisation: Saltford Parish Council

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Saltford Parish Council understands the need to find suitable sites in B&NES. Legal sites make enforcement against illegal sites more likely to succeed in the courts. Saltford Parish Council views the protection of the Green Belt as a priority and is concerned that the scoring matrix used by B&NES does not reflect the Government's Planning Policy for Traveller Sites issued in March 2012, which states:

Government's aims in respect of traveller sites are:

- that plan-making and decision-taking should protect the Green Belt from inappropriate development;
- to enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure.
- Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development.

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

Bath & North East Somerset Council has allocated the land adjacent to Ellsbridge House, in Keynsham, with a preferred site status despite being ranked 15th out of 23 in the matrix system. This site is very near to Saltford and the nursery at the location may take Saltford children. The site is inappropriate for the following reasons:

- The proposal was put forward as a 'preferred site' without due regard to the fact that the site would be adjacent to, and shares an access with, a nursery (Snapdragons) which is due to open in September 2012;
- The Preferred Sites Consultation document approved by Cabinet on 9 May 2012 (and the subject of current ongoing consultation) makes no mention of the fact that the site would be adjacent to and shares an access with a Nursery. Furthermore the plan included within the consultation document shows the adjacent property as being 'Ellsbridge House Management and Community Education Centre' when the Council, through various departments, is fully aware of the fact that the Ellsbridge House property is now a nursery. This fact was specifically raised at the Planning, Transport and Environment Policy Development and Scrutiny Panel on 15 May 2012 and prior to publication of the Preferred Sites Consultation document on 23 May 2012;
- The lack of suitable highway access to the site. Gypsies/Travellers on the proposed site would have to share access with the nursery or use a new access route, which would likely be created at the expense of a bus stop used by Wellsway School pupils who live in the village of Saltford. As there are no suitable locations for the bus stop to be relocated, it may have to be removed;
- The fact that the site is currently mature woodland and a designated breeding area for wild bats.
- The OFSTED requirements for site safety and the safeguarding of children at the nursery will be difficult or impossible to meet if the site is shared in the way proposed.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 233 / 1 Name: Mr John Douglas Organisation: Avon Valley Farm

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

NO

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

NO

Do you agree that the potential pitch provision be taken forward as a formal allocation?

NO

Do you have any other general comments on the Preferred Options paper?

The site is not suitable for the following reasons

- 1.) The trees on the site divide visually the residential properties on the A4 on the south side from the industrial units on the north.
- 2.) On the existing site there is a lot of wildlife on the site and I have lived here for 36 years and have witnessed first hand Roe deer leaving the site.
- 3.) The A4 is already congested and morning and at night there is slow jam of traffic all the way from the roundabout right through to Saltford and another new entrance with caravans pulling onto the road this will affect the movement of traffic greatly
- 4.) the industrial estate is already a problem and major headache for police in the area for robberies and I am sure the police will not support the site being in this area.
- 5.) Ellsbridge house is being at great expense being converted into a nursery school and I do not think it is appropriate to have a travellers site next door as there is no control who would be living on this temporary site.

Respondent: 263 / 6 Name: Ms Gillian Sanders Organisation: Wessex Water

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

Bristol water for water supply

On site drainage is private; there is a public foul sewer available for connection in the vicinity of the site.

There is limited capacity in the downstream network but capacity available for foul sewerage only from proposed 6 permanent or 15 temporary pitches

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 279 / 4 Name: Mr Rohan Torkildsen Organisation: English Heritage

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

We hope the following comments will help shape a plan which provides a more robust case for appropriate sites in accordance with the National Planning Policy Framework (NPPF).

Schedule of comments: GT.14 Land near Ellsbridge House, Keynsham

At present English Heritage is concerned by the assessment process employed to determine site suitability. The approach fails to apply an even handed consideration of the key planning issues particularly the affect of proposed site allocations on the historic environment.

The Plan fails to demonstrate that evidence about the historic environment has been used to assess the significance of all heritage assets affected and how they contribute to the local area.

Site assessments process

An initial sift of 23 sites discarded certain options that were contrary to "national planning policy" including sites located within an Area of Outstanding Natural Beauty (AONB).

"Those sites identified as being within and thus impacting adversely on the national landscape designation, the Cotswolds Area of Outstanding Natural Beauty were rejected"

There is no reason or explanation why sites in the AONB were rejected as a matter of course whilst those in the Green Belt, World Heritage Site (WHS) or adversely affecting a designated heritage asset were not.

You have allowed the consideration of sites in the Green Belt due to 'exceptional circumstances' but have not considered sites in the AONB for the same reason.

I refer to Policy E pg 5, National Policy for Traveller Sites March 2012. "Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development.

There is no justification for the AONB being given greater weight in the plan making process than Greenbelt, the World Heritage Site, Conservation Areas or indeed in the curtilage of a Grade II listed Building. You should note that Paragraph 14 of the NPPF attaches the same weight to designated heritage assets as Green Belt and AONB.

As such if you choose to reject sites in the AONB as a matter of course you should also reject sites within the WHS, Conservation Areas or within the grounds of a listed building. We are not suggesting you do this as a matter of course but we are anxious to ensure a thorough consideration of the historic environment and all heritage assets, as defined in the NPPF, is undertaken and that greater weight is not applied as a matter of principle to the AONB or that those sites within the AONB are omitted for that reason.

A 2 stage sift process was used to exclude certain sites. The scoring matrix was used to assess the relative sustainability of each site based on whether they were in the Green Belt, landscape, wildlife designation, flood risk or land contamination. This fails to give an appropriate weight to the consideration of heritage assets. You should note that heritage conservation is at the heart of the definition of sustainable development in the NPPF. Inadequate weight has been applied to heritage conservation in the assessment process.

Likewise the assessment process appears to have given greater weight to matters such as noise and overlooking.

Page 14 of the Site Assessment Report refers to the emerging Core Strategy Policy CP11 and the need to ensure sites should have no adverse impact on nationally recognised designations (criteria g) and do not harm the character and appearance of the surroundings (criteria d).

For a variety of reasons various sites have been rejected. But none appear to have been abandoned due to the adverse impact on heritage assets e.g. school building, Radstock; Ellsbridge House, Keynsham.

Unequal weight appears to have been applied to various relevant significant criteria without proper regard to the strategic NPPF principles for the conservation of heritage assets.

The Site Scoring Matrix at Appendix B of the Assessment Report makes no reference to the impact on heritage assets other than the World Heritage Site or Conservation Areas. There is no consideration, for example of the impact on listed

buildings such as Ellsbridge House, Keynsham.

Unless there is clear evidence to demonstrate otherwise your site search sift should clearly have resulted in the omission of the Ellsbridge House as development in the curtilage of a listed building would presumably harm its historic significance and would therefore be contrary to NPPF and emerging Core Strategy policy?

I refer to Appendix E of the Site assessment report

"Development at this location would likely not assist the promotion of peaceful and integrated co-existence between the site and the locality due to the level of visual exposure".

Has this same assessment been undertaken for all other sites?

Ellsbridge House, Keynsham (GT.14)

You will be aware that in accordance with the NPPF paragraph 132 "great weight" should be given to the conservation of any heritage asset, including its setting. The Preferred Options document acknowledges that the proposal within the curtilage of this Grade II Listed Building "would have an impact on the setting of that building". However there is no evidence that sets out the extent of this impact; the significance of the heritage asset likely to be affected; and the role of the 'front garden' (the site for the pitches) to the assets significance; and the degree of harm- a significant omission. You may wish to apply The Setting of Heritage Assets (English Heritage Guidance, 2011) to help establish the relative impact on the Grade II listed house. As previously mentioned the Site Scoring Matrix criteria fails to consider the impact on any heritage asset other than a WHS or conservation area, again a serious omission.

With this inconsistent and unbalanced assessment process there is no convincing case to justify harm to this heritage asset.

Specific preferred options.

Without prejudice to the above I have the following specific comments on the preferred options.

Planning across boundaries

If BANES Council are struggling to find suitable sites might there be alternative opportunities in adjoining local authority areas? Local planning authorities are required to work collaboratively with other bodies to ensure that strategic priorities such as adequate provision for Gypsies, Travellers and Showpeople across local boundaries are properly co-ordinated and clearly reflected in local plans

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Conclusion

We strongly recommend a more consistent and objective process of evaluation to ensure this Plan accords with the NPPF and its principles for sustainable development in relation to protecting and enhancing the historic environment, and national policy for the provision of suitable traveller sites.

As it stands the Plan fails to demonstrate that adequate evidence and subsequent informed assessment has been undertaken contrary to the NPPF. As such English Heritage considers the plan is unsound.

Respondent: 281 / 5 Name: Ms Alison Howell Organisation: Natural England

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

#### Preferred Options

The Council has selected six preferred sites for development. The site selection process identified four main constraints: Green Belt, landscape and/or wildlife designations, flood risk and contaminated land. Natural England is satisfied the assessment criteria and scoring matrix applied to the site selection appears robust and consistent with government policy for the planning of traveller sites.

We consider the approach taken also broadly accords with the National Planning Policy Framework (NPPF), including with respect to paragraph 110 which states "In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework".

#### Site Constraints

Notwithstanding the above, the Sustainability Appraisal has identified a number of issues with the development of the preferred sites, including likely impacts on landscape, ecology and public access.

- The assessment of Site GT.14 near Ellsbridge House, Keynsham describes the site as a flat area of land covered by dense vegetation. Its location adjacent to industrial properties and the A4 Bath Road is a significant barrier to the development of this site.

Natural England considers the constraints and suggested mitigation and enhancement measures outlined in the Sustainability Appraisal appear reasonable, however we would like to make the following comments:-

#### Sustainable Development - the Natural Environment and Biodiversity

Natural England would welcome a commitment in the Plan to moving from a net loss of biodiversity to achieving net gains for nature, as required in the NPPF paragraph 9.

#### Use of Brownfield land of low environmental value

The preferred options reflect the NPPF paragraph 111 in terms of the need for planning policies and decisions to encourage the effective use of land by re-using land that has been previously developed, however the Plan should also recognise that some brownfield land can be of high environmental value and ensure suitable avoidance or mitigation measures are in place.

#### Enhancing landscape and biodiversity in Green Belts

Natural England would welcome a greater emphasis on enhancement of the Green Belt in line with the NPPF Paragraph 81 in terms of seeking opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land".

#### Light Pollution – Landscape and Wildlife

Natural England would welcome a requirement to minimise light pollution in accord with NPPF paragraph 125 "By encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation".

#### Ecological networks and Green Infrastructure

Making Space for Nature (A review of England's Wildlife Sites and Ecological Network) highlighted action to support ecological networks as an effective response to conserve wildlife in environments that have become fragmented by human activities. It stated: "An ecological network comprises a suite of high quality sites which collectively contain the diversity and area of habitat that are needed to support species and which have ecological connections between them..." with this in mind, Natural England would welcome a commitment in the Plan to ensuring the development of all preferred sites incorporate multifunctional green infrastructure in accordance with the emerging Bath & North East Somerset Core Strategy policy, draft Green Infrastructure Strategy and local biodiversity action plan.

Respondent: 296 / 6 Name: Ms Gill Stirling Organisation:

Schedule of comments: GT.14 Land near Ellsbridge House, Keynsham

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

I am writing regarding the preferred sites for travellers and showmen. I can only comment on your list although I believe some of these were not even thought suitable by your own consultants. It seems to me that both the travellers and local residents should be considered when making a decision. I do not live near any sites and believe that those who do should have the greater influence.

**GT14: Land near Ellsbridge House, Keynsham**

A totally unsuitable site for travellers. It would seem to most thoughtless to suggest they would want to live adjacent to a busy roundabout. You have just given permission to open a nursery at Ellsbridge house with no warning of the change of use of the woodland. You will be turning a pleasant wooded area into a car park, completely altering the surroundings for the nursery and probably affecting their business. This site was even considered most unsuitable on your original list. Why on earth has it even been put on the current list? It would appear to be unsuitable to both travellers and local residents. I object strongly to this site being considered.

Respondent: 1111 / 2 Name: Mrs Sue Bressington Organisation: Compton Dando Parish Council

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

Land near Ellsbridge House, Keynsham is next to the main A4, which is quite difficult for entry and egress. Its also quite close to the waste and recycling site at Ashmead Rd, and to the industrial sites there. It will have a visual impact on the listed building, Ellsbridge House, which has been sold as a children's preschool nursery opening September 2012. Its not clear how the Travellers' site will be separated from the nursery site, or whether they'll have shared access and grounds.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 1323 / 1 Name: Mr Christopher Thomas J. Organisation: Marksbury Parish Council

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

Its nearness to a listed building makes it inappropriate for a traveller site.

The shared access is unacceptable

The likely loss of mature trees is an important consideration.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No.

Do you have any other general comments on the Preferred Options paper?

Respondent: 2387 / 1 Name: Mr Roger Sirett Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

I trust my views were recorded at The Fear Institute in Keynsham

Respondent: 2617 / 1 Name: Ms Rosemary Collard Organisation: Snapdragon Nursery

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

1. The size of the site is inaccurate according to Land Registry documentation by at least 20%.
2. The site does not have its own access from the busy A4 Bath Road. The access serving Ellsbridge House, now registered as Snapdragons Day Nursery and Out of School Club is totally unsuitable for shared use, particularly in view of the fact that it operates a one-way system following the line of the natural driveway.
3. The site is covered by dense woodland amounting to more than 100 trees. The trees form a screen that acts as a visual barrier to the industrial estates behind.

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

I do agree that the site is available and owned by the council. I knew this fact and enquired about purchasing the site. As part of our nursery care and education, we run forest school activities. I felt this site would offer excellent opportunities for forest school. If we were able to purchase this site, we could maintain and care for the woodland and offer the area to the wider community so that local children could come and play and benefit from this local amenity. In fact the government's revised Early years Foundation Stage curriculum states that children must spend part of their day outside and there is no better way than in a natural woodland where play can be free and unstructured. If the site were to be made available for purchase, we would do so and use it for the benefit of all families, both at nursery and in the wider environment.

I do not agree that it provides an opportunity to be developed as a gypsy and traveller site or indeed any residential site because of the difficulties of access, the busy A4 and the location of the industrial estate, all of which make it highly unsuitable for residential development for families with young children. In addition, once the trees are removed to make way for development, much of the screening provided by the trees will disappear and this will increase the amount of

noise and pollution which again makes for a totally unsuitable environment for families.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

I do not agree that the potential pitch provision be taken forward because there are too many reasons why the site is undeliverable and these have been highlighted by the council and by myself.

The recommendation by the council was "the site is inappropriate for development due to the location adjacent to the industrial estate and the A4 Bath Road. Significant measures to protect resident amenity and privacy, safe highway access and health would be required at this location. It is considered unsuitable for development as either a Gypsy, Traveller or Travelling Showpeople site due to these constraints. The site should not be allocated for development".

In addition the ownership of Ellsbridge House has changed and is now Snapdragons Day Nursery which means the access is being used daily and this access needs to be secure in order to ensure we are safeguarding the children to the best of our ability. Shared access is always difficult to manage and I need to ensure that I manage this to the best of my ability otherwise I will not fulfill the statutory welfare requirements laid down by Ofsted.

Do you have any other general comments on the Preferred Options paper?

I have submitted several statements to the council about my concerns as to the suitability and deliverability of this site. I have found the whole process very time consuming and worrying, at a time when I have been trying to promote the nursery and recruit new members of staff.

I completely believe that families have a right to choose where they want to live and should not be discriminated against because of the choices they make. Running a children's nursery means that our environment must be inclusive and diverse and I firmly believe that it is not right to place families in areas that have already been deemed unsuitable for development for perfectly sound and valid reasons. I work with families every day and know that it is the home environment that has the most profound impact on a child's health and well-being. Being wedged between an industrial estate and the busy A4 presents as a significant barrier to achieving a healthy lifestyle and should not be allowed.

Respondent: 2617 / 2 Name: Ms Rosemary Collard Organisation: Snapdragon Nursery

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

Our main concerns are:

- 1.The shared access onto this site. If we have shared access the point at which the land next to Ellsbridge House is accessed, would be very difficult, if not impossible to secure, leaving the site vulnerable to trespassers and loose animals. At present we use a barrier that the college used to use and that does give us some protection. Being able to secure the property is of paramount concern to us because we have a duty to safeguard the children in our care and because the site is unoccupied at weekends and overnight.
- 2.If a new access from the highway were to be created, the bus stop which serves the pupils of Wellsway School would need to be relocated.
- 3.There is currently no existing boundary at all between Ellsbridge House and the land in question as it sits on the main driveway to the house and so substantial fencing would be required to secure the sites.
- 4.According to land registry documentation, the site boundary for the plot of land next to Ellsbridge House used by the council's planning consultants in the site assessment report is wrong and part of the land belonging to Ellsbridge House has been included. As this area constitutes a considerable proportion of the proposed site, the number of plots considered viable would need to be reassessed.
- 5.The site is referred to on the documents as Ellsbridge House Management and Community Education Centre. This is no longer the case. It is now Snapdragons Nursery and Out of School Club.
- 6.As a children's day nursery, we are highly regulated by Ofsted and part of our protecting and safeguarding children responsibility means that all staff need to have a CRB and that all visitors to the site need to be signed in or escorted. I also

have to be sure that no children can be photographed or videoed. This is further reason why the boundary issue is so sensitive to us.

7.The land in question is densely wooded with mature trees and so does not appear to be suitable without extensive tree surgery and excavation work to prepare it for any form of dwelling. However, it would provide a wonderful natural environment for learning outdoors and we had approached Property Services to express our interest in buying or renting this woodland. Unfortunately, we received no response.

8.Ellsbridge House is a Grade II listed building and therefore we had to get consent to carry out alterations. Everything has had to be done to maintain the integrity of the building and this includes part of the gardens surrounding the building. Indeed plans for the new police centre being built to the rear of Ellsbridge House, had to take account of its impact on the house and appropriate landscaping formed part of the planning regulations.

9.When we first advertised the nursery we had in excess of 60 registrations/enquiries. Since the announcement of the proposed site in April, we have had less than 10. We also received some concerned enquiries. I did mention this to a Planning Consultant who suggested I could pass any concerned parents onto her and she would answer their queries.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

We exchanged contracts on Ellsbridge House, better known locally as Norton Radstock Veterinary College, in December 2011 and completed the sale in January 2012. We were completely unaware of the proposed use of the site and nothing was revealed in the solicitor's search even though the purchase took place during the public consultation period.

Towards the end of April, we heard from a local journalist, that the adjacent woodland was being considered as a possible travellers' site. The proposals were shortly due to be announced to the public. This was the first intimation we had of the Council's plans for this site. On the same day, a neighbour of Ellsbridge House was alerted to the proposal by a BBC journalist who knocked at his door wanting to know how he felt about it. This neighbour subsequently contacted us.

We immediately contacted the B&NES Planning Department and were told that there was a Cabinet meeting on 9th May where seven possible sites would be discussed and that following this meeting there would be an eight-week public consultation period beginning towards the end of May. During this conversation we were not informed that we could have any input at the cabinet meeting. In fact, we were given the impression that this was a purely internal affair for cabinet members. We were told that the list of seven sites being considered on 9th May had been released into the public domain at the very early stages of the process of choosing sites so that the public was involved and that the process was transparent. Subsequently, we have discovered that Ellsbridge House had, by that time, already been short-listed from an initial 23 sites and that the process had been begun in November 2011.

On Monday 14th May we heard from another source about the DPD Meeting at the Guildhall the next day. We realised that the public could attend this meeting, but were unaware that we would be able to speak. Once we reached the meeting it became apparent that we would be able to represent ourselves, but the opportunity to be prepared in expressing our concerns at this stage would have been welcomed.

We really believe that Snapdragons Nursery will be a valuable asset to the area and, indeed to B&NES Council itself. We will be providing many additional childcare and out of school places, supporting working parents. In addition, the government has announced its intention to provide additional free places for disadvantaged two-year olds and the opening of this setting will help the local authority and the Early Years team to fulfil this objective. We will also be creating 40-50 new local jobs at all skills levels, including apprenticeships. The proximity of Wellsway School will mean that we are able to offer workplace experience for young adults. Our plans for forest school and other on-site training offer opportunities for the wider community. All our nurseries aim to use local suppliers for all their food needs and other service, for example gardening and maintenance.

We have a recruitment evening later this month for this nursery and over 30 people have applied for positions. This is exciting for us and should be viewed very positively in light of Keynsham's forthcoming regeneration project.

However, this excitement is being overshadowed by some of our concerns relating to the possible Gypsy and Traveller site.

**Schedule of comments: GT.14 Land near Ellsbridge House, Keynsham**

I am sure you can appreciate that starting up a new business with the uncertainty of the plans for the adjacent land hanging over us is very worrying. We have invested a substantial amount of money in the purchase of the property and associated fees and are now in the middle of refurbishment which is a very costly exercise because of the regulations we have to adhere to when caring for children and being an employer and the additional regulations in respect of listed buildings. What started out as being an exciting project and one which we hoped would be seen as offering additional services and employment for Keynsham has now turned into fighting for the survival of this business which could ultimately impact on the success of the rest of our business. We have been trading in Wiltshire and Bath since 1998. We care for over 1000 local children and employ about 150 local staff. I must say that at the moment I feel very let down by the people who should be supporting local businesses during these uncertain times.

Respondent: 2683 / 3 Name: John Hudson Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

Your proposal for a Gypsy traveller site within the grounds of Ellsbridge House a CHILDREN'S DAY NURSERY is also preposterous.

The Day Nursery only recently purchased the premises from B&NES, yet B&NES, neglected to inform the purchasers your intentions of 'short listing' the grounds around the nursery for a Gypsy Travellers site. This is appalling.

Perhaps the toddlers should write to you and shame you into withdrawing it like the children at Camerton did.  
**THIS SITE SHOULD NOT BE ON ANY LIST.**

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 3020 / 1 Name: Mr Rodney Carter Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

No

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No

Regarding the site GT14;

The wooded area (GT14) is part of a green corridor, which connects Keynsham, via the roundabout, to the agricultural land behind Pixash Lane and Worlds End Lane.

This connection allows Bats and Birds a two way corridor to move back and forth as outlined and I have been aware of it for the 27 years that I have lived in Lytton Grove.

I feel that removing/altering this woodland could affect the biodiversity of the town.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No

Do you have any other general comments on the Preferred Options paper?

Respondent: 3020 / 2 Name: Mr Rodney Carter Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

I have already stated that the Ellesbridge House Woodland is part of a green corridor for Bats, I also think that it is rather stupid to interfere with the traffic trying to come away from a very busy roundabout (that is not lane marked Still !) and the cutting down and clearing of 150 mature trees will cause chaos as well as interfering with the green corridor.

You have already dumped a Police Reception Centre on Keynsham don't make it a second dumping please

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 3051 / 1 Name: Paul Israel Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No

Do you have any other general comments on the Preferred Options paper?

Respondent: 3051 / 1 Name: Paul Israel Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

No

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No this site is not suitable for any sort of development

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No

Do you have any other general comments on the Preferred Options paper?

We feel this site is totally unsuitable as a gypsy/traveller site.

It has a very mature woodland which supports a lot of wild animals and a large number of nesting birds. Has Banes carried out a detailed wild life and tree survey on this land? I know this land has slow worms present and according to conservative counsellor Brian Simmons he believes there are rare bats that inhabit this site.

This woodland also puts a green barrier between the residents of Keynsham and the Trading estate and the civic amenity site.

There is also a public footpath running thru this site from the Bath Rd to the ashmead trading estate that I use a lot I would not want that removed.

This proposed site borders a grade 2 listed building that is being converted to a childrens nursery this will bring much needed employment to Keynsham if it's a success. This site will then have to be divided to keep the childrens nursery and the travellers site separate. Access to and from the site onto the main A4 is an accident waiting to happen this entrance is far to small to allow entrance and exit for caravans and commercial vehicles.

My neighbour was refused planning for a drop kerb onto the A4 just to park a family car outside his house Banes refused saying the A4 was too dangerous. So how can Banes now think this entrance is suitable for caravans and commercial vehicles.

We don't want the bus stop moved this is used by a lot of elderly people How far away are you planning to site it? It currently occupies a purpose built lay-by for the safety of bus and passengers.

Respondent: 3056 / 1 Name: Mr Rodney Carter Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

Having dumped a Prison/Holding facility on Keynsham, you are now intent on giving us unnecessary permanent travellers pitches. My understanding was that these pitches would only be built IF there was a demand in a particular area. I have not seen travellers in the Keynsham area for many years.

(I believe they may object to the stigma of having to live near a Prison/Holding facility!)

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 3057 / 1 Name: Mr Brian Cordwell Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Destruction of 150 trees. The co-owner of Ellsbridge House Nursery hoped to buy the woodland area to use as an outdoor classroom, it would teach children of a young age about a green environment and the importance of green issues, as this would be a better use. Health and Safety issue with shared entrance with vehicles in and out, with a nursery so close and an already traffic problem on the A4. Another entrance would add problems onto the A34 including Broadmead Lane. Pixash Lane and the Nursery.

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No, Constraints explained

Do you agree that the potential pitch provision be taken forward as a formal allocation?

NO

Do you have any other general comments on the Preferred Options paper?

Respondent: 3095 / 6 Name: Mr Joe Evans Organisation: Avonside CPRE

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

There are a number of specific issues with this site that need to be resolved before any decision is made about its suitability or otherwise.

Firstly, Policy CP11 of the B&NES Draft Core Strategy (which sets out the requirements for assessing site suitability) states: "Use of the site must have no harmful impact on the amenities of neighbouring occupiers."

Given that the site has shared access with an adjacent nursery, it is unclear whether this condition can be met. The business owner states that she has had substantially less interest from new parents since the Sites Allocations Consultation process begun; if this is the case, then potentially the mere fact of the identification of this site has already had a harmful impact on the amenities of neighbouring occupiers.

Secondly, the site is adjacent to an extremely busy road junction. It is unclear whether the site would be suitable for residential use, based on the air and noise pollution created by large volumes of stationary traffic.

Thirdly, the proposal for the site as it stands appears to require the felling of around 150 mature trees.

Further work is required to resolve these points before this site can be taken forward in the Sites Allocations process.

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

1. Evidence base

We question the validity of the current evidence base for the needs of Gypsies and Travellers and its compliance with current government policy. The 2007 Gypsy and Traveller Accommodation (and other needs) Assessment has been used as the basis for this process. However, at five years old, it cannot be taken as an authoritative guide to the needs of a population that is by definition transient and fluid. Paragraph 4 of the DCLG's 'Planning Policy for Traveller Sites' of March 2012 states:

"...that local planning authorities should make their own assessment of need for the purposes of planning"

B&NES Council has clearly not made its own assessment of need as required; it has relied on five year old regional research. B&NES Council's own Site Assessment Report states:

"The precise need for sites to meet the new national policy will require a review of the GTAA study, preferable [sic] at the West of England level." [para. 1.4]

This has also not yet been carried out.

The March 2012 Planning Policy also states:

"In assembling the evidence base necessary to support their planning approach, local planning authorities should:

1. pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups)
2. co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of the likely permanent and transit accommodation needs of their areas over the lifespan of their development plan working collaboratively with neighbouring local planning authorities
3. use a robust evidence base to establish accommodation needs to inform the preparation of local plans and make planning decisions."

Because B&NES has not carried out its own research, it does not comply with this policy, having had no new formal consultation with travellers on their accommodation needs.

Because older research is being used, B&NES Council will not have a 'up-to-date understanding' of travellers' needs as required.

In failing to comply with the first two requirements, B&NES Council has not created a 'robust evidence base' and thus does not comply with the third requirement.

We are calling for a fresh process of evidence-gathering to inform a revised list of possible preferred sites based on up-to-date evidence.

## 2. Requirements of different travelling communities

The DPD recognises that the needs of travelling showpeople are different from those of gypsies and travellers [2.7]. However, it does not recognise the different and sometimes incompatible needs of New Travellers, Romany Gypsies and Irish Travellers. These groups do not always have harmonious relations with one another and B&NES Council's previous consultations suggested that enough land should be allocated to allow groups to live separately from one another [3.3]. The current proposed preferred options list places 15 of 25 permanent places on one site, the Old Colliery at Stanton Wick. This would not allow different groups to live separately from one another and would thus not meet the aims set out at 3.3. We would argue that a larger number of small sites would better meet travellers' needs than the current list. It would also minimise the impact on settled communities.

This is back by Paragraph 4.6 of the B&NES Council Issues and Options Report on this subject, which states:

"The need for smaller sites in Bath & North East Somerset district is supported by the West of England GTAA which found that most surveyed respondents expressed a preference to live in smaller family-sized sites of no more than five pitches." We would like to see an analysis of the different needs of the different sectors of the travelling community as part of the new evidence-gathering process mentioned above.

## 3. Green Belt

Policy E (para. 14) of the March 2012 policy states:

"Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development."

This is backed by the National Planning Policy Framework. Government policy thus prevents the development of Gypsy and Traveller Sites in Green Belt except in very special circumstances. We do not feel that this requirement has been met by the current process. Of the six proposed Preferred Sites, GT1 (Woolard Lane), GT 2 (Old Colliery, Stanton Wick) and GT8 (Lower Bristol Road) lie within Green Belt. The only justification given for the 'very special circumstances' required to approve development in Green Belt is that no other sites are available. The Sites Assessment Report states:

"The absence of appropriate land outside the Green Belt to meet the identified level of need is considered to contribute to very special circumstances."

In this case, the absence of other available sites does not simply 'contribute' to the 'very special circumstances'; it is the sole justification for Green Belt development.

We feel that this is plainly not sufficient to prove that 'very special circumstances' exist, especially taken alongside the out-of-date evidence base being used. If the justification for Green Belt development is that there is a need that cannot be met in any other way, then plainly the need must be derived from the most robust evidence. Equally, although the Call for Sites did not yield any other sites outside of Green Belt, such sites may well exist, especially if the principle set out above of using smaller sites rather than larger is followed.

We feel that a fresh needs assessment should be carried out to provide a robust evidence base; further work should then be done to identify additional potential sites that are not in Green Belt. The current list of preferred options should be

revised, to include only those Green Belt sites for which there is robust, up-to-date evidence of need and for which it can be demonstrated that there are genuinely exceptional circumstances to justify their inclusion.

#### 4. Flaws in policy-making processes

Although the DPD has been prepared with a process that gives the appearance of being based on assessment of evidence, it is in fact deeply flawed. The matrix used to assess the suitability of sites in the Site Assessment Report appears to have been scored in an arbitrary manner in places; furthermore, the results of the scoring matrix bear little relationship to the shortlist of sites taken through to the Preferred Options DPD consultation document. A decision was taken at the Council's Cabinet meeting on 9 May 2012 to eliminate rejected sites so as to prepare the Preferred Options DPD consultation document. At that stage, no meaningful consultation had been carried out on either the process of site selection, the needs of the Gypsy and Traveller community in the area or the specific sites included in the process. The decision to create a shortlist before consultation had been carried out was contrary to both the 2008 Regulations on the preparation of Development Plan Documents and the 2012 NPPF, which states:

"155. Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made."

Respondent: 3103 / 1 Name: Ann Reeves Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

No

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

Yes

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Mixed.

I have concerns for the safety of the young children in regards to the Keynsham pitch. The highway is very busy, and even with a fence around the area it would be very unsafe. Additionally, if they enrolled at the local primary schools, they would need to cross a very busy highway that does not have a pedestrian crossing. The co-op is the only local shop they could access on foot safely.

I disagree with the arguments the new nursery has put forward in the local press. They do not own the land, so they have no basis to state they want to use the land. A small 6 pitch site will not impact on the safety and well-being of the children.

Do you have any other general comments on the Preferred Options paper?

Hopefully once the site is agreed, system are put in place to work with the families to ensure if they are staying long-term the children will be supported to access local schools and healthcare. We have home education in place, if the families prefer to not enrol at a local school for a short-time, and they can then receive more targeted education and support.

Respondent: 3107 / 1 Name: Mr Anthony Orley Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

YES

#### SECTION 4: POTENTIAL FOR DEVELOPMENT AND SUITABILITY OF SITE ISSUES

I agree with statements in the Banes Council assessment study that the GT.14 site is not considered suitable for development as a Gypsy or Traveller site.

It is impossible to gain safe A4 access to this site. The current attempt at safety mitigation by introducing a single

Schedule of comments: GT.14 Land near Ellsbridge House, Keynsham

compromise access very close to the A4 Broadmead Roundabout to be used by the Gypsy/Travellers site and the Child Day Care Nursery at Ellsbridge House is deeply flawed. See detailed statements at Section 2 above.

It has serious Health and Safety issues in relation to the laid down criteria for the protection of site occupants particularly children. See detailed statements at Section 3 above.

**SECTION 5: AVAILABILITY AND ACHIEVABILITY ISSUES**

I agree the site is council owned and I agree with the Banes assessment that there are significant barriers to the development of this site. These barriers are so significant and so serious that it is difficult to understand why Banes Council would want to persevere any further and waste any further money on this proposal.

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No

**1.1 STATEMENT ON RELEVANT INFORMATION PROVIDED BY BANES COUNCIL**

The BANES assessment statement in this section is somewhat sparse and is very selective on the information provided i.e. it says:

The site is 0.3 hectares.

The site is outside the Keynsham housing development boundary.

The site has good access to local services and facilities.

**1.2 FURTHER IMPORTANT AND RELEVANT INFORMATION ON THE SITE AND SURROUNDING AREA**

I would like to point out the following facts:

a. The current site is 0.3 hectares of long established densely populated woodland of mainly deciduous trees which will have to be destroyed and removed. This woodland was originally part of the grounds of the nearby Grade 2 listed building Ellsbridge House.

b. The site is wedge shaped and is sandwiched between an existing Industrial Estate on its long Northern boundary and the heavily trafficked A4 trunk road on its long Southern boundary. On its narrow Western boundary there is a public footpath and an open stream which eventually feeds into the River Avon approximately 1 mile to the North. On its Eastern boundary is the Grade 2 listed building Ellsbridge House and its grounds.

c. There are long established residential properties in a laid back ribbon development along the A4 trunk road. These properties are directly facing the long Southern boundary of the GT.14 site.

d. The existing woodland on the site is an essential landscape feature for the whole area. It also protects the A4 residential properties from the visual and noise impact from the Ashmead Road Industrial Estate which is on the Northern boundary of the site.

**SECTION 2: HIGHWAYS ACCESS – SAFETY CRITICAL HAZARD ISSUES**

**2.1 THE IDENTIFIED SAFETY CRITICAL HAZARD**

The Banes Council assessment statement acknowledges there is a serious road safety issue associated with this site because of the heavily trafficked A4 trunk road:

a. The Highways Authority has clearly stated they will resist in the interests of Highway Safety any attempt to add an extra access to the A4 in this location close to the A4 Broadmead Roundabout.

b. The Highways Authority have emphasised this particularly applies given the need for access of large towing vehicles and caravans.

These statements are very important because the Highways Authority has identified what amounts to a Safety Critical Hazard which is a well known term under the long established procedures and processes of Hazard Analysis. These statements are vital to the further issue of site access which is developed further in the following paragraph 2.2

## 2.2 THE HIGHWAYS AUTHORITY SUGGESTION OF A COMPROMISE ACCESS WHICH MIGHT BE CONSIDERED AND SAFETY CRITICAL ISSUES ASSOCIATED WITH THIS SUGGESTION

Taking into account the statements already made by the Highways Authority (see paragraph 2.1) it is somewhat disturbing they have suggested a compromise entrance to the GT.14 site might be considered if it also replaces the existing sub-standard entrance to the private property access to Ellsbridge House. There are very serious issues to be raised in relation to this relaxation of safety by the Highways Authority and I respectfully request the Highways Authority take another look at this suggestion and its implications.

a. The new compromise access would have to serve the GT.14 Gypsy/Travellers site and those people who want to gain access to the Ellsbridge House Child Day Care Nursery. The suggested access is at the position of the existing A4 bus stop pull in which would have to be moved elsewhere. Once again where will this new compromise access to the GT.14 site be? It will be in very close proximity to the A4 Broadmead Roundabout. It is the very same Safety Critical location which the Highways Authority has already said would not be tolerated in the interests of Highway Safety.

b. It does not make any sense or reasoning to allow an identified Safety Critical Hazard to be created on the justification it will eliminate a lesser hazard at the Ellsbridge House existing private access which is further away from the A4 Broadmead Roundabout. It defies the basic principles of Safety Hazard Analysis and would not stand up to a Safety Hazard Analysis scrutiny.

c. Some may argue buses go in and out of the existing bus stop at this compromise access location every day. Yes they do! but bus drivers are very skilled and experienced undertaking this kind of manoeuvre. It is also a fact motorists generally expect buses to pull in and out and are triggered to react immediately they spot a bus ahead of them. It is unfortunately a sad fact, which I can vouch for personally, that cars and motorcycles accelerating out of the curvature of the A4 Broadmead Roundabout do not apply the same kind of vigilance and quick reaction to other vehicles ahead of them. It takes vehicles an average of 4 seconds from the time they exit the final bend of the roundabout to reach the location where the compromise access would be sited. There is no scope for error or delayed reaction here.

d. There have been numbers of accidents in this location over the years. Some minor which continue to happen and some have been serious for which I can personally vouch if required. The latest accident happened early afternoon a couple of days ago 10 July 12 on the curvature of the A4 Broadmead Roundabout heading East towards the nearby location of the Banes Council proposed compromise access to the GT.14 site. Because of the number of emergency vehicles attending it was difficult to see what vehicles were involved. It appeared the emergency services considered this accident to be of a serious nature because there were three fire appliances, an ambulance, what appeared to be an emergency doctor vehicle and police cars in attendance. The A4 immediately east of the A4 Roundabout was temporarily closed off while the fallout from the accident was sorted out. Once again another example of how uncompromising and dangerous this part of the A4 in close proximity to the A4 Broadmead Roundabout can be.

e. The current sub-standard entrance to Ellsbridge House further up the road towards Bath is far from satisfactory. However for people who use that access the idea of moving them approximately 50 metres nearer to the threat which is traffic accelerating out of the curvature of the A4 Broadmead Roundabout is an increased risk they could do without.

f. It needs to be taken into account and acknowledged by Banes planners before any further expense is wasted on this GT.14 site that there is no safe access to the site. The suggestion of a compromise access in close proximity to the A4 Broadmead Roundabout is deeply flawed, is very dangerous and will be a high risk and potentially disastrous path to follow. One fatal accident could cause multiple deaths which would be an ultimate price for the victims and their families to pay for a flawed safety mitigation of an already identified Safety Critical Hazard.

## 2.3 A PREVIOUS PLANNING APPLICATION FOR STORAGE OF CARAVANS ON THIS GT.14 SITE

I would like to bring attention to the following:

Schedule of comments: GT.14 Land near Ellsbridge House, Keynsham

a. In 1980 a planning proposal WK113/D was made by the old Wansdyke Council to store caravans on the same site now being proposed by Banes Council as a Gypsy/Travellers caravans and trailers site. After a case was made to the then County and Highways Committee the proposal was rejected by that committee on the grounds access to the site was too dangerous.

b. The planning proposal was withdrawn by Wansdyke Council.

c. Since the planning proposal WK113/D was withdrawn on Highways Safety grounds in 1980 nothing much has changed except three things:

Traffic load on the A4 has increased.

Vehicles are much more rapid.

Driving is much more aggressive.

There is therefore a Planning Proposal refusal precedent to this latest proposal being made by Banes Council. This provides further proof that any access to this proposed GT.14 site should not be contemplated under any circumstances. Access is too dangerous and not in the interest of Highway Safety.

### SECTION 3: SITE CONSTRAINTS INCLUDING HEALTH AND SAFETY OF SITE OCCUPANTS ISSUES

I would like to raise the following factual information and issues arising:

#### 3.1 RELEVANT FACTS IN RELATION TO LANDSCAPING AND SCREENING

I do not agree with the statement made in the Banes Council assessment report that the site benefits from existing screening at the site boundaries acting as a visual barrier to the Industrial Estate to the North of the A4 trunk road at this location. The statement is wrong and ill informed. It is the density and depth of the woodland which acts as a visual and noise barrier to the Industrial Estate not just a few trees on the boundary. This is particularly the case in the winter months when the deciduous trees have dropped their foliage. Local residents in this area and the general landscaping of the whole district have depended for many years on the protection provided by the long established woodland. The Banes Council instead of destroying it should be placing a preservation order on this woodland.

#### 3.2 IMPACT OF THE GT.14 SITE ON THE GRADE 2 LISTED BUILDING ELLSBRIDGE HOUSE

Banes Council has already acknowledged the site on its eastern boundary is adjacent to the Grade 2 listed building Ellsbridge House and will have a detrimental impact on the setting of the listed building. The woodland in question was originally part of the Ellsbridge House estate. As already stated above the destruction of the woodland will also have a devastating impact on the whole district.

#### 3.3 HEALTH AND SAFETY ISSUES FOR OCCUPANTS ON THIS SITE

It is noted Banes Council acknowledge in their assessment report the GT.14 site does not meet the Health and Safety criteria laid down for Gypsy/Traveller sites.

It fails to meet the criteria for the Health and Safety of site occupants because the site has an existing Industrial Estate immediately on the long Northern border of the site. The criteria dictates sites should not be located near to Industrial Estates.

It is also unlikely to meet the Health and Safety criteria for site occupants in relation to noise levels. The site has the heavily trafficked and noisy A4 Trunk Road in very close proximity running along the whole of the long Southern border of the site. The site will be a particularly unpleasant place to reside being wedged between the A4 trunk road and the Industrial Estate. It will also be a high risk site for children. They will have easy access on the Southern boundary straight onto the very dangerous A4 Trunk Road via any access road to the site. They will also have easy access to a refuse sorting centre on the Northern Boundary Industrial Estate. The refuse sorting centre site is trafficked by heavy vehicles bringing environmental collection refuse to the site for sorting. I can vouch that access to the Industrial site refuse sorting centre is easily achieved from within the proposed GT.14 site. I have recently done it without contravening any laws or regulations.

All in all there is nothing going for this site in relation to the Health and Safety of the site occupants particularly children.

### 3.4 ENVIRONMENTAL AGENCY ISSUE NOT ACCOUNTED FOR BY BANES COUNCIL

There is an open fresh water stream at the narrow western end of the proposed GT.14 site near the A4 Broadmead Roundabout. This stream I believe eventually feeds into the River Avon approximately 1 mile to the North. A developed site will not give the surface water protection currently provided by the dense woodland trees. Any toxic material or liquids accidentally spilled or not carefully managed, contained or not properly disposed of on a developed site could find its way into the fresh water stream. The end result would be contamination of the River Avon.

### 3.5 GENERAL ENVIRONMENTAL ISSUE

The Woodland Trust is currently running a campaign for school children to locally plant a copse of trees to breathe fresh air into their neighbourhood. Banes Council on the other hand are intent on destroying the whole densely populated woodland at the proposed GT.14 site. Vehicles produce CO<sub>2</sub>. Trees absorb CO<sub>2</sub>. Every little bit helps particularly for the community already living in this area near the A4 Trunk Road. Any occupants on the GT.14 site certainly would not get any benefit because the trees would not be there. They will already have been destroyed by Banes Council.

### 3.6 PROTECTED SPECIES RELEVANT INFORMATION NOT ACCOUNTED FOR BY BANES COUNCIL

I live opposite Ellsbridge House and I suggest Banes have a protected species bat problem which they have not taken into account. For many years bats have been seen flying and circling low over our garden while feeding on flying insects in the evening. This is most noticeable in summer months when I have studied the bats flight patterns in the twilight of a clear evening sky. The bats fly over our garden but they come in from the direction of the woodland site which you have designated as GT.14. It is quite possible the bats reside in the woodland. Bats are known to reside in old dead or hollow trees. It will require a comprehensive study of the woodland to decide on this issue otherwise Banes Council would be contravening protected species legislation.

### 3.7 MINISTRY OF DEFENCE SECURITY ISSUE NOT ACCOUNTED FOR BY BANES COUNCIL

In the Banes Council proposal I cannot see any evidence that the MoD has been consulted in relation to the proposed development on the GT.14 site. The MoD has a substantial establishment in very close proximity to the proposed site.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No

I disagree with the Banes Council description of the existing site. This is not a flat area of land covered by dense vegetation. This is dense woodland of mainly large deciduous trees.

Do you have any other general comments on the Preferred Options paper?

YES

My statements in this section refer to the Appendix B of the Banes Council Site Assessment Report. My statements only apply to the GT.14 site Land near Ellsbridge House Keynsham.

The current scoring for this site formulated by Banes Council begs belief. For anybody who has a true knowledge of this district and its issues the following matrix items would all get a negative score.

Site Screening: minus 8 if the woodland is destroyed only leaving boundary trees.

Landscape Designation: minus 10 destroying the Woodland would have a massive impact on the whole district.

European Protected Species: YES there is a strong possibility bats reside in this woodland.

Hazardous Place: minus 8 the site is sandwiched between an Industrial Estate on its long Northern border and the heavily trafficked and noisy A4 Trunk Road on its long Southern border.

Safe Access to Highway: minus 10 a Safety Critical Hazard has already been identified and the latest attempt at mitigation by introducing a compromise access is deeply flawed and dangerous.

Taking into account all the other scores already applied by Banes Council and taking into account the above suggested amended scores the total combined score for the GT.14 site would be minus 35. Not good reading for a proposed preference site.

Respondent: 3107 / 2 Name: Mr Anthony Orley Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

Reference A: Banes Council Document - Gypsies, Travellers and Travelling Show People Site Allocations Development Plan – Preferred Options Stage – Detailed Site Assessment Report.

This response only applies to the specific option defined at Appendix E of the above REF 'A' report i.e. the detailed site assessment table for the site:

GT.14 Land near Ellsbridge House, Keynsham, BS31 1TL

I have lived in this district near to Ellsbridge House for 35 years and I feel I have the knowledge and experience to provide relevant information and raise relevant issues in relation to the Banes Council proposed development of the current woodland at the GT.14 site.

In order to structure this response I have mainly responded to each of the sections and statements made in the BANES Appendix E site assessment table. This enables relevant information to be provided and identified and enables appropriate issues to be raised. My response is therefore structured as follows:

- Section 1: Site and Surrounding Areas Information.
- Section 2: Highways Access - Safety Critical Hazard issues.
- Section 3: Site Constraints including Health and Safety of Site Occupants.
- Section 4: Potential for Development and Suitability of Site issues.
- Section 5: Availability and Achievability issues.
- Section 6: Site Capacity.
- Section 7: Banes Council site scoring matrix issues.
- Section 8: My Summary
- Section 9: Conclusion

## SECTION 1: SITE AND SURROUNDING AREAS INFORMATION

### 1.1 STATEMENT ON RELEVANT INFORMATION PROVIDED BY BANES COUNCIL

The BANES assessment statement in this section is somewhat sparse and is very selective on the information provided i.e. it says:

The site is 0.3 hectares.

The site is outside the Keynsham housing development boundary.

The site has good access to local services and facilities.

### 1.2 FURTHER IMPORTANT AND RELEVANT INFORMATION ON THE SITE AND SURROUNDING AREA

I would like to point out the following facts:

- a. The current site is 0.3 hectares of long established densely populated woodland of mainly deciduous trees which will have to be destroyed and removed. This woodland was originally part of the grounds of the nearby Grade 2 listed building

Ellsbridge House.

b. The site is wedge shaped and is sandwiched between an existing Industrial Estate on its long Northern boundary and the heavily trafficked A4 trunk road on its long Southern boundary. On its narrow Western boundary there is a public footpath and an open stream which eventually feeds into the River Avon approximately 1 mile to the North. On its Eastern boundary is the Grade 2 listed building Ellsbridge House and its grounds.

c. There are long established residential properties in a laid back ribbon development along the A4 trunk road. These properties are directly facing the long Southern boundary of the GT.14 site.

d. The existing woodland on the site is an essential landscape feature for the whole area. It also protects the A4 residential properties from the visual and noise impact from the Ashmead Road Industrial Estate which is on the Northern boundary of the site.

## **SECTION 2: HIGHWAYS ACCESS – SAFETY CRITICAL HAZARD ISSUES**

### **2.1 THE IDENTIFIED SAFETY CRITICAL HAZARD**

The Banes Council assessment statement acknowledges there is a serious road safety issue associated with this site because of the heavily trafficked A4 trunk road:

a. The Highways Authority has clearly stated they will resist in the interests of Highway Safety any attempt to add an extra access to the A4 in this location close to the A4 Broadmead Roundabout.

b. The Highways Authority have emphasised this particularly applies given the need for access of large towing vehicles and caravans.

These statements are very important because the Highways Authority has identified what amounts to a Safety Critical Hazard which is a well known term under the long established procedures and processes of Hazard Analysis. These statements are vital to the further issue of site access which is developed further in the following paragraph 2.2

### **2.2 THE HIGHWAYS AUTHORITY SUGGESTION OF A COMPROMISE ACCESS WHICH MIGHT BE CONSIDERED AND SAFETY CRITICAL ISSUES ASSOCIATED WITH THIS SUGGESTION**

Taking into account the statements already made by the Highways Authority (see paragraph 2.1) it is somewhat disturbing they have suggested a compromise entrance to the GT.14 site might be considered if it also replaces the existing sub-standard entrance to the private property access to Ellsbridge House. There are very serious issues to be raised in relation to this relaxation of safety by the Highways Authority and I respectfully request the Highways Authority take another look at this suggestion and its implications.

a. The new compromise access would have to serve the GT.14 Gypsy/Travellers site and those people who want to gain access to the Ellsbridge House Child Day Care Nursery. The suggested access is at the position of the existing A4 bus stop pull in which would have to be moved elsewhere. Once again where will this new compromise access to the GT.14 site be? It will be in very close proximity to the A4 Broadmead Roundabout. It is the very same Safety Critical location which the Highways Authority has already said would not be tolerated in the interests of Highway Safety.

b. It does not make any sense or reasoning to allow an identified Safety Critical Hazard to be created on the justification it will eliminate a lesser hazard at the Ellsbridge House existing private access which is further away from the A4 Broadmead Roundabout. It defies the basic principles of Safety Hazard Analysis and would not stand up to a Safety Hazard Analysis scrutiny.

c. Some may argue buses go in and out of the existing bus stop at this compromise access location every day. Yes they do! but bus drivers are very skilled and experienced undertaking this kind of manoeuvre. It is also a fact motorists generally expect buses to pull in and out and are triggered to react immediately they spot a bus ahead of them. It is unfortunately a sad fact, which I can vouch for personally, that cars and motorcycles accelerating out of the curvature of the A4 Broadmead Roundabout do not apply the same kind of vigilance and quick reaction to other vehicles ahead of them. It

takes vehicles an average of 4 seconds from the time they exit the final bend of the roundabout to reach the location where the compromise access would be sited. There is no scope for error or delayed reaction here.

d. There have been numbers of accidents in this location over the years. Some minor which continue to happen and some have been serious for which I can personally vouch if required. The latest accident happened early afternoon a couple of days ago 10 July 12 on the curvature of the A4 Broadmead Roundabout heading East towards the nearby location of the Banes Council proposed compromise access to the GT.14 site. Because of the number of emergency vehicles attending it was difficult to see what vehicles were involved. It appeared the emergency services considered this accident to be of a serious nature because there were three fire appliances, an ambulance, what appeared to be an emergency doctor vehicle and police cars in attendance. The A4 immediately east of the A4 Roundabout was temporarily closed off while the fallout from the accident was sorted out. Once again another example of how uncompromising and dangerous this part of the A4 in close proximity to the A4 Broadmead Roundabout can be.

e. The current sub-standard entrance to Ellsbridge House further up the road towards Bath is far from satisfactory. However for people who use that access the idea of moving them approximately 50 metres nearer to the threat which is traffic accelerating out of the curvature of the A4 Broadmead Roundabout is an increased risk they could do without.

f. It needs to be taken into account and acknowledged by Banes planners before any further expense is wasted on this GT.14 site that there is no safe access to the site. The suggestion of a compromise access in close proximity to the A4 Broadmead Roundabout is deeply flawed, is very dangerous and will be a high risk and potentially disastrous path to follow. One fatal accident could cause multiple deaths which would be an ultimate price for the victims and their families to pay for a flawed safety mitigation of an already identified Safety Critical Hazard.

## 2.3 A PREVIOUS PLANNING APPLICATION FOR STORAGE OF CARAVANS ON THIS GT.14 SITE

I would like to bring attention to the following:

a. In 1980 a planning proposal WK113/D was made by the old Wansdyke Council to store caravans on the same site now being proposed by Banes Council as a Gypsy/Travellers caravans and trailers site. After a case was made to the then County and Highways Committee the proposal was rejected by that committee on the grounds access to the site was too dangerous.

b. The planning proposal was withdrawn by Wansdyke Council.

c. Since the planning proposal WK113/D was withdrawn on Highways Safety grounds in 1980 nothing much has changed except three things:

- Traffic load on the A4 has increased.
- Vehicles are much more rapid.
- Driving is much more aggressive.

There is therefore a Planning Proposal refusal precedent to this latest proposal being made by Banes Council. This provides further proof that any access to this proposed GT.14 site should not be contemplated under any circumstances. Access is too dangerous and not in the interest of Highway Safety.

## SECTION 3: SITE CONSTRAINTS INCLUDING HEALTH AND SAFETY OF SITE OCCUPANTS ISSUES

I would like to raise the following factual information and issues arising:

### 3.1 RELEVANT FACTS IN RELATION TO LANDSCAPING AND SCREENING

I do not agree with the statement made in the Banes Council assessment report that the site benefits from existing screening at the site boundaries acting as a visual barrier to the Industrial Estate to the North of the A4 trunk road at this location. The statement is wrong and ill informed. It is the density and depth of the woodland which acts as a visual and noise barrier to the Industrial Estate not just a few trees on the boundary. This is particularly the case in the winter months when the deciduous trees have dropped their foliage. Local residents in this area and the general landscaping of the whole district have depended for many years on the protection provided by the long established woodland. The Banes Council

instead of destroying it should be placing a preservation order on this woodland.

### 3.2 IMPACT OF THE GT.14 SITE ON THE GRADE 2 LISTED BUILDING ELLSBRIDGE HOUSE

Banes Council has already acknowledged the site on its eastern boundary is adjacent to the Grade 2 listed building Ellsbridge House and will have a detrimental impact on the setting of the listed building. The woodland in question was originally part of the Ellsbridge House estate. As already stated above the destruction of the woodland will also have a devastating impact on the whole district.

### 3.3 HEALTH AND SAFETY ISSUES FOR OCCUPANTS ON THIS SITE

It is noted Banes Council acknowledge in their assessment report the GT.14 site does not meet the Health and Safety criteria laid down for Gypsy/Traveller sites.

It fails to meet the criteria for the Health and Safety of site occupants because the site has an existing Industrial Estate immediately on the long Northern border of the site. The criteria dictates sites should not be located near to Industrial Estates.

It is also unlikely to meet the Health and Safety criteria for site occupants in relation to noise levels. The site has the heavily trafficked and noisy A4 Trunk Road in very close proximity running along the whole of the long Southern border of the site. The site will be a particularly unpleasant place to reside being wedged between the A4 trunk road and the Industrial Estate. It will also be a high risk site for children. They will have easy access on the Southern boundary straight onto the very dangerous A4 Trunk Road via any access road to the site. They will also have easy access to a refuse sorting centre on the Northern Boundary Industrial Estate. The refuse sorting centre site is trafficked by heavy vehicles bringing environmental collection refuse to the site for sorting. I can vouch that access to the Industrial site refuse sorting centre is easily achieved from within the proposed GT.14 site. I have recently done it without contravening any laws or regulations.

All in all there is nothing going for this site in relation to the Health and Safety of the site occupants particularly children.

### 3.4 ENVIRONMENTAL AGENCY ISSUE NOT ACCOUNTED FOR BY BANES COUNCIL

There is an open fresh water stream at the narrow western end of the proposed GT.14 site near the A4 Broadmead Roundabout. This stream I believe eventually feeds into the River Avon approximately 1 mile to the North. A developed site will not give the surface water protection currently provided by the dense woodland trees. Any toxic material or liquids accidentally spilled or not carefully managed, contained or not properly disposed of on a developed site could find its way into the fresh water stream. The end result would be contamination of the River Avon.

### 3.5 GENERAL ENVIRONMENTAL ISSUE

The Woodland Trust is currently running a campaign for school children to locally plant a copse of trees to breathe fresh air into their neighbourhood. Banes Council on the other hand are intent on destroying the whole densely populated woodland at the proposed GT.14 site. Vehicles produce CO<sub>2</sub>. Trees absorb CO<sub>2</sub>. Every little bit helps particularly for the community already living in this area near the A4 Trunk Road. Any occupants on the GT.14 site certainly would not get any benefit because the trees would not be there. They will already have been destroyed by Banes Council.

### 3.6 PROTECTED SPECIES RELEVANT INFORMATION NOT ACCOUNTED FOR BY BANES COUNCIL

I live opposite Ellsbridge House and I suggest Banes have a protected species bat problem which they have not taken into account. For many years bats have been seen flying and circling low over our garden while feeding on flying insects in the evening. This is most noticeable in summer months when I have studied the bats flight patterns in the twilight of a clear evening sky. The bats fly over our garden but they come in from the direction of the woodland site which you have designated as GT.14. It is quite possible the bats reside in the woodland. Bats are known to reside in old dead or hollow trees. It will require a comprehensive study of the woodland to decide on this issue otherwise Banes Council would be contravening protected species legislation.

### 3.7 MINISTRY OF DEFENCE SECURITY ISSUE NOT ACCOUNTED FOR BY BANES COUNCIL

In the Banes Council proposal I cannot see any evidence that the MoD has been consulted in relation to the proposed development on the GT.14 site. The MoD has a substantial establishment in very close proximity to the proposed site.

#### SECTION 4: POTENTIAL FOR DEVELOPMENT AND SUITABILITY OF SITE ISSUES

I agree with statements in the Banes Council assessment study that the GT.14 site is not considered suitable for development as a Gypsy or Traveller site.

It is impossible to gain safe A4 access to this site. The current attempt at safety mitigation by introducing a single compromise access very close to the A4 Broadmead Roundabout to be used by the Gypsy/Travellers site and the Child Day Care Nursery at Ellsbridge House is deeply flawed. See detailed statements at Section 2 above.

It has serious Health and Safety issues in relation to the laid down criteria for the protection of site occupants particularly children. See detailed statements at Section 3 above.

#### SECTION 5: AVAILABILITY AND ACHIEVABILITY ISSUES

I agree the site is council owned and I agree with the Banes assessment that there are significant barriers to the development of this site. These barriers are so significant and so serious that it is difficult to understand why Banes Council would want to persevere any further and waste any further money on this proposal.

#### SECTION 6: SITE CAPACITY

I disagree with the Banes Council description of the existing site. This is not a flat area of land covered by dense vegetation. This is dense woodland of mainly large deciduous trees.

#### SECTION 7: BANES COUNCIL SITE SCORING MATRIX ISSUES

My statements in this section refer to the Appendix B of the Banes Council Site Assessment Report. My statements only apply to the GT.14 site Land near Ellsbridge House Keynsham.

The current scoring for this site formulated by Banes Council begs belief. For anybody who has a true knowledge of this district and its issues the following matrix items would all get a negative score.

Site Screening: minus 8 if the woodland is destroyed only leaving boundary trees.

Landscape Designation: minus 10 destroying the Woodland would have a massive impact on the whole district.

European Protected Species: YES there is a strong possibility bats reside in this woodland.

Hazardous Place: minus 8 the site is sandwiched between an Industrial Estate on its long Northern border and the heavily trafficked and noisy A4 Trunk Road on its long Southern border.

Safe Access to Highway: minus 10 a Safety Critical Hazard has already been identified and the latest attempt at mitigation by introducing a compromise access is deeply flawed and dangerous.

Taking into account all the other scores already applied by Banes Council and taking into account the above suggested amended scores the total combined score for the GT.14 site would be minus 35. Not good reading for a proposed preference site.

#### SECTION 8: MY SUMMARY

The Banes Council recommendation in their assessment study for a Gypsy/Travellers facility to be located at the GT.14 site near Ellsbridge House Keynsham is a gross understatement of the actual task confronting the Council. The Council say the site has a number of issues which would require mitigation works to be completed before development and occupancy could take place.

Let us be clear about this. The site has a number of very serious and significant Highways Safety and Site Occupants Health and Safety issues and other constraint as a huge barrier in the way of any development. These are summarised below.

Each summary below has a reference to the more detailed statements made in the main body of this response.

Please also refer to my conclusions at Section 9 below.

**a. HIGHWAYS SAFETY ISSUES**

The proposed GT.14 site still has Safety Critical highways access issues which cannot be mitigated against. The suggestion of creating a new compromise access very close to the A4 Broadmead Roundabout is so badly flawed and highly dangerous it will not stand up to a properly conducted Hazard Analysis Scrutiny. There is also a previous planning proposal refusal precedent for storage of caravans on this very site. It was refused on the grounds of danger to highways safety.

References: See detailed statements at Section 2 paragraph 2.1, 2.2, 2.3 of this response.

**b. HEALTH AND SAFETY OF SITE OCCUPANTS ISSUES**

The proposed GT.14 site has serious Health and Safety issues which do not meet the regulation laid down criteria for the Health and Safety of Site Occupants.

Reference: See detailed statements at Section 3 paragraph 3.3 of this response.

**c. VISUAL IMPACT GRADE 2 LISTED BUILDING AND GENERAL LANDSCAPING OF DISTRICT ISSUES**

As acknowledged by Banes Council the proposed GT.14 site will have a visual impact on the nearby Grade 2 Listed Building Ellsbridge House. Destruction of the woodland to accommodate this proposed GT.14 development would also have a massive detrimental impact on the whole area and its residents for a number of reasons.

Reference: See detailed statements at Section 3 paragraph 3.1, 3.2 of this response.

**d. ENVIRONMENTAL AGENCY ISSUE NOT TAKEN INTO ACCOUNT BY BANES COUNCIL**

There is no evidence in the Banes Council assessment report that the Environmental Agency has been consulted on the following environmental risk. There is a substantial open fresh water stream at the western end of the site. It is understood this stream eventually feeds into the River Avon approximately one mile to the North. There is a risk this stream could become contaminated from a developed site. This could lead to contamination of the River Avon.

Reference: See detailed statements at Section 3 paragraph 3.4 of this response.

**e. PROTECTED SPECIES NOT TAKEN INTO ACCOUNT BY BANES COUNCIL**

There is a protected species issue which Banes Council has not taken into account in their assessment report.

Reference: See detailed statements at Section 3 paragraph 3.6 of this response.

**f. MINISTRY OF DEFENCE SECURITY ISSUE NOT ACCOUNTED FOR BY BANES COUNCIL**

There is no evidence in the Banes Assessment Report that the MoD has been consulted in relation the proposed development of the GT.14 site in close proximity to the existing MoD establishment.

Reference: See detailed statement at Section 3 paragraph 3.7 of this response.

**g. BANES COUNCIL SITE SCORING MATRIX AT APPENDIX B OF THEIR ASSESSMENT REPORT ISSUES**

The site scoring for the suitability of the GT.14 site for development begs belief for anybody who knows this area and its issues. The current scoring for this site which is already a lowly 17 is grossly overvalued.

Reference: See detailed statements at Section 7 of this response.

**h. GENERAL ENVIRONMENT ISSUE**

The Woodland Trust is currently running a campaign for schoolchildren to plant a copse of trees to breathe fresh air into their neighbourhood. What does Banes Council intend for the residents already living very near to this proposed GT.14 site. They are intending to cut down the trees and destroy a whole woodland of mainly large deciduous trees.

Reference: See detailed statements at Section 3 paragraph 3.5 of this response.

#### SECTION 9: CONCLUSION

I respectfully request Banes Council to think again on this GT.14 site proposal. The whole proposal is straddled with a minefield of very serious safety issues. Mitigation to try and correct or reduce safety risk to an acceptable level can only go so far. It cannot however overcome the immovable. The site is completely in the wrong place for the proposed development. It has the A4 Highways Safety Critical access issue to contend with. Your current attempt at safety mitigation by suggesting a new compromise access very close to the A4 Broadmead Roundabout is so badly flawed it would not stand up to a properly conducted Safety Analysis scrutiny. I respectfully request and implore the Highways Authority to withdraw their suggestion that a compromise access very close to the A4 Broadmead Roundabout might, just might, be considered acceptable. It completely contradicts everything the Highways Authority has said and done in the interests of Highway Safety in this area over many years.

On the question of the Health and Safety of site occupants you have already stated in your site assessment document the site is not suitable for use as a Gypsy/Travellers site. You are now proposing to carry out Health and Safety mitigation to try and prove yourself wrong. Once again you cannot move the immovable. The proposed site has the heavily trafficked and potentially dangerous and noisy A4 directly on its long Southern Boundary. It has a long established Industrial Estate directly on its long Northern Boundary. If you destroy the woodland the site could also suffer from a traffic pollution problem. These immovable objects do not meet the laid down criteria for the site of a Gypsy/Traveller facility and never will.

I suggest the time has come to accept the site is not suitable for any kind of development. It should also be realised the existing dense woodland on this site already provides an essential need. If the woodland was destroyed it would have a devastating impact on the whole landscaping of this district including the Grade 2 Listed Building Ellsbridge House. It would also open up the noise and visual impact of the Industrial Estate to the A4 road corridor and to the long established residential properties along the A4 in this area. The woodland should not be destroyed it needs to have a preservation order put on it.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 3276 / 1 Name:

Organisation: Snapdragons Nursery Ltd

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

Our client, Snapdragons Nurseries Ltd, purchased Ellsbridge House in January this year and has recently secured Listed Building Consent for alterations to form a new day care nursery - they are therefore very concerned at the possible use of the adjacent land as a permanent or transit site for gypsies or travellers.

The fact that this site was being considered for such a use did not come to light during our clients purchase of Ellsbridge House and this could have had a bearing on their consideration to buy.

Appendix 5 of the Detailed Site Assessment Report highlights the proposed use of the building as well as the potential issues concerning the existing access to Ellsbridge House and the lack of suitable access to the proposed site. Any modifications to the existing access would be costly and our client has no plans to carry out any works in this area at the

present.

The report also notes that the site has fairly dense tree coverage and our client would not wish to see the screening that this provides reduced.

The report states that 'This site is not considered suitable for development as a Gypsy or Traveller site due to its location adjacent to a busy and noisy highway'. We would therefore question why it was not rejected as being unsuitable at an early stage.

We trust that the concerns of our client and their use of Ellsbridge House will be taken into consideration and that the proposal for this site will be rejected.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 3297 / 1 Name: Mr Ben Scott Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

I am writing to express my concerns over the conversion of the site next to Ellsbridge House as a permanent gypsy/traveller site. This land has many mature trees which should be preserved, not destroyed. It is next to a new business venture which would undoubtedly be affected by such a site. It is also near a busy roundabout on a main road and movement too and from the site could be dangerous. As a resident on Bath Road this would also have a detrimental affect on property values making it harder to get mortgages, which are already difficult enough. The local schools, which are currently gaining 'outstanding' ofsted inspections would also be affected.

I feel that if BANES wishes to provide a site then it should be closer to Bath city centre so as greater control can be gained over the site and the damage to the environment will be less.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 3300 / 1 Name: Ms Suki Chana Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

It has recently been brought to my attention that the council are planning a permanent travellers site near Ellsbridge House in Keynsham. As a council tax payer to BANES I must protest in the strongest possible terms to such a plan as it would inevitably lead to long term problems for the local community along with destruction of the local environment

**Schedule of comments: GT.14 Land near Ellsbridge House, Keynsham**

around Ellsbridge House. The plan is also likely to have a significant detrimental impact on local economy in terms of property values and general business. I would find it hard to support any council or councillors in the who would put forward and sanction such a plan and urge / insist that the council dismiss such plans.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 3306 / 1 Name: Mr Andrew Stafford Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

I disagree that the site is very well located for access to the wider highway network. Access on to the site would have to be established from the A4 Bath Road Broadmead roundabout with access provided from the industrial estate side. Providing adjoining access to Ellsbridge House will add to the traffic problem and is likely to increase the risk of accidents due to the drivers who constantly ignore the reduced speed limit directly after the Broadmead roundabout..

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No. It seems inconceivable to me that planning consent can be provided to a site that adjoins a newly acquired Grade II listed building that will shortly be operated as a children's nursery. It will inevitably lead to a loss of revenue and probable closure due to perceptions however prejudiced. This will logically lead to the loss of an important facility for working parents in preference to a protected minority who in comparison will add less to the local economy.

Do you have any other general comments on the Preferred Options paper?

I think any public sector investment needs to take full account of the potential impact that this has on the local economy. It seems counter-intuitive to me that any investment will adversely affect the local economy unless the benefits are replicated elsewhere in the area, which in this case are clearly not.

Respondent: 3308 / 1 Name: Ms Charlotte Luton Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

I would like to register my opposition to this plan for a number of reasons including the location near to a new nursery and pre-school, felling of mature trees to gain access to the site, impact on local property values and the mess that is created.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 3310 / 1 Name: Ms Nikki Prewett Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No, Policy CP11 of the Draft Core Strategy states that the following criteria should be met

d: the site does not harm the character and appearance of the surrounding area

The area of WOODLAND which would need to be removed and be replaced with the site currently shields the industrial estate behind it from view. Removing the woodland will create an eyesore of the industrial site.

B: satisfactory means of access can be provided and the existing highway network is adequate to service the site

The A4 bath road is already heavily congested especially at peak times when this road often comes to a stand still. Any traffic exiting the site will have limited visibility of oncoming traffic from the roundabout beyond the bus stop.

Schools on this side of Keynsham are more full than those on the Bristol side which are very much under subscribed.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No

Do you have any other general comments on the Preferred Options paper?

Respondent: 3316 / 1 Name: Ms Dawn Drury Organisation: Keynsham Town Council

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Comments relate to site GT.14 – land near Ellsbridge House, Keynsham.

Concerns for the ecology on this site have been raised and we would urgently request that Environmental and Ecology Assessment Surveys be carried out on this site. We have received information that suggests evidence of slow worms, protected species of bats and newts.

The woodland on this site has been classed as very important woodland.

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

The site would have a significant impact on the setting and the Grade II Listed Building of Ellsbridge House, which is a children's nursery.

This site is on the fringe of Green Belt land and this could have an impact on the existing Green Belt.

A full Highways and Traffic Safety Assessment should be undertaken in respect of either of the proposed accesses on to the site.

The site has not been defined correctly and it is suggested that a full land registry search be undertaken to reveal the true extent of the possible site, as it is much smaller than shown within the Consultation document.

The relocation of the bus stop to the front of the site should not be undertaken without prior permission of the Traffic Commission. Keynsham Town Council should be consulted in respect of any proposed plans to relocate this particular bus stop, as they are responsible for the up keep of this bus stop.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No.

Do you have any other general comments on the Preferred Options paper?

At the Special Council meeting on 9th May 2012, the Preferred Option Sites were referred to as Possible Option sites and not preferred sites.

The data used in respect of provision and requirements for Gypsies, Travellers and Travelling Show people for the local authority is taken from 2007 and it is believed that current data should be used to obtain correct provision/requirement figures.

The Planning and Development Committee believe that evidence should be shown that the Gypsy and Traveller Community have been asked whether this particular site would be suitable and meet their needs.

Respondent: 3317 / 1 Name: Ms Kate Hahn Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

There is very clear evidence that there is a lack of childcare providers in Keynsham and surrounding areas. Especially as another popular childcare provider in Keynsham is closing down imminently. The Ellsbridge House site is currently being developed into a setting to help to meet the needs of parents and children in the local area and is very much welcomed. However there is evidence that the inclusion of the land adjacent to this site as a preferred setting for the gypsies and travellers has had a direct impact on parents likelihood to use this setting. The evidence is the diminished interest in the childcare providers places and local opinion.

There are other options for sites to be used for the gypsies and travellers. However for local residents to the Ellsbridge House site there is a very great need for the childcare provider to be a success and that relies on parents feeling comfortable and confident to entrust their children to it.

With the number of childcare places due to be available at Ellsbridge House and the amount of money already invested by the business the adjacent site cannot be considered for the use of gypsies and travellers.

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No, the constraints have not been clearly analysed for this site and the effects on the adjacent business and how that impacts the local community have not been properly considered. The detriments are greater than considered and the weight of which should have ruled out suitability of this site.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Absolutely not. This site should be retrospectively ruled out due to the weighting of the significant adverse impact to the adjacent business and the significant adverse impact on the ability of that business to meet an identified need within the local community. It would be in direct contradiction to the Childcare Act and BANES own objectives to improve childcare sufficiency ratios for the business to be forced to close through a lack of interest.

Do you have any other general comments on the Preferred Options paper?

Due to:

Significant adverse effects on the adjacent business

Significant adverse effects on the local community if using the site has a direct impact on the adjacent businesses ability to continue with plans to provide childcare placements

Contradiction to the Childcare Act and BANES own objectives to ensure adequate childcare provision throughout the area.

In Keynsham the childcare ratio of EYE places fell to below 1 in September 2011. It is vital that BANES maintains its commitment to ensure that there is adequate childcare provision in Keynsham and once an adequate is reached that it is not allowed to fall again to an inadequate level.

In these respects it is clear that this site cannot be considered on the weighting of suitability.

Respondent: 3318 / 1 Name: Ms Jayne Smith Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

See below

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No. As a resident living opposite this proposed development I feel that there are a few issues that have been overlooked:  
1.Road safety – I feel the road safety issues have been understated. On 2 separate occasions (unrelated to this proposal) I have called both the council and contacted my local councillors to advise of my road safety concerns. For pedestrians and cars alike this is a very unsafe stretch of the A4. I actively avoid walking from my house to the local supermarket as it is very difficult to cross safely anywhere in the vicinity of the Broadmead roundabout. It is a blind spot with traffic coming off the roundabout from all directions and at speed. I have personally witnessed numerous accidents on this stretch of the A4. The introduction of towing vehicles, large vehicles, loose animals and possibly children would be most unsafe and potentially disastrous, if not fatal.

I find it quite puzzling that access for less transport, and fewer people has been turned down on safer stretches of the road further towards Saltford (rightly so), and yet access here is even being considered.

2.Woodland and wildlife – I feel that the document has understated the maturity of the woodland. It refers to the area as "dense vegetation" which is not the case. This is an established wood populated with mature, mainly deciduous trees, some of which are hundreds of years old that contain wildlife. I have seen bats in the vicinity; this should be investigated. This woodland also screens local residents and the a4 corridor from the industrial estate and recycling plant behind; both in terms of view and of noise. These trees are very established and in keeping with the listed building next door. I believe for these reasons it is inappropriate to fell established woodland. I do not and cannot support the council cutting down trees unnecessarily, particularly where it provides an environmental filter from the industrial estate.

3.Bus stop – It is unacceptable to move this well used bus stop.

4.Accesses to education – Local schools are already at capacity, in fact I understand they are currently oversubscribed.

5.Listed building to be used as a nursery – This site is adjacent to a beautiful listed building that is being sympathetically renovated at considerable expense to the new owner and opened as a children's nursery. Shared access is clearly not viable in order to secure the site and the felling of the woodland in favour of a gypsy/traveller caravan site; is not obviously in keeping with the setting of a listed building. I understand the nursery owner was not advised of these proposals when she purchased the house from the council despite these plans being known. This is morally reprehensible and I was appalled to hear that the council had operated in this manner.

6.Residential impact – The report makes it appear that this is not a residential area. This is simply not true. This site is overlooked by a well-established residential area. I am one of the residents. The residential area would be impacted negatively by this development.

7.Noise – The trees currently mask the noise from the busy roundabout, industrial estate and A4. Loss of these tress would increase noise levels for the gypsy/traveller community and local residents alike

8.Health and safety – For the road traffic reasons above how could the council secure the safety of children on the site? How exactly would loose animals be prevented from running into the road? Equally, the impact of towing traffic and heavy vehicles coming and going would hold up the flow of traffic and pose severe safety issues.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No. Absolutely not. Reasons above.

Do you have any other general comments on the Preferred Options paper?

Consultation - The word "consultation" in this case has been mis-used. Neither myself, nor any of my neighbours who are directly affected by this proposal have ever been communicated with by the council. We happened upon this proposal, after the so-called consultation had already started, via publicity generated by action groups from other sites. This is unacceptable and underhand. Still, most local residents are unaware of the proposals – was the council hoping to pass this matter under the radar? – that's how it feels and I am disgusted. I have, to date, not received one single piece of communication on this matter from the council despite living directly opposite the proposed site. Consultation? What sort of consultation is that? Perhaps the council were relying on telepathy to let residents know of this consultation process. Absolute farce!

I would like to understand how to make a formal complaint about this.

Site selection – I have read the scoring system for site suitability and cannot understand how this site has made it to the top 6, given it did not receive one of the highest scores. The whole process seems highly questionable and based on assumptions rather than facts.

Respondent: 3319 / 1 Name: Mr David Matthews Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

In addition to my own local knowledge, I have the clear evidence of the Council's own negative site assessment table on which to base my objections to this proposal. There is, to my mind, absolutely nothing to justify consideration of this site, and it does not meet the required standards under the National Guidance.

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No. The Council's own Site Assessment Table clearly indicates that the site is quite unsuitable for development as proposed and, from consideration of the various reports on the subject, it is also clear that the process used by the Council to positively list this site for inclusion was deeply flawed..

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No. There is nothing to justify taking this site forward, and the Council has yet to explain why the site was moved from 17th on its original list to a more favourable position, given that nothing has changed to remove any of the negative comments arising in the Council's Detailed Site Assessment Table. To re-state a number of the criteria indicating the unsuitability of this site:

The site currently provides local residents with a visual barrier to the industrial estate.

There will be the loss of some 150 mature trees, with consequential adverse effect on local wildlife.

There are severe safety concerns arising from the location of this site in close proximity to a major road junction on the very busy A4.

The site is adjacent to a Grade II listed building, and development will adversely affect the setting of this building.

The Grade II listed building is shortly due to open as a Day Care Nursery, and there will be unacceptable danger to children and older people as a result of large towing vehicles and caravans manoeuvring in this area.

With the above in mind, any proposal to develop a joint entrance to Ellsbridge House and this site would be totally unacceptable, not to mention extraordinarily dangerous for Ellsbridge House users.

Development of the site will require the relocation of a well used bus stop.

Do you have any other general comments on the Preferred Options paper?

Do you have any other general comments on the Preferred Options paper?

Please focus your comments on planning issues, national and local policies, government guidance and best practice for Gypsy and Traveller sites.

There is nothing to justify taking this site forward, and the Council has yet to explain why the site was moved from 17th on its original list to a more favourable position, given that nothing has changed to remove any of the negative comments arising in the Council's Detailed Site Assessment Table. To re-state a number of the criteria indicating the unsuitability of

this site:

The site currently provides local residents with a visual barrier to the industrial estate. There will be the loss of some 150 mature trees, with consequential adverse effect on local wildlife. There are severe safety concerns arising from the location of this site in close proximity to a major road junction on the very busy A4. The site is adjacent to a Grade II listed building, and development will adversely affect the setting of this building. The Grade II listed building is shortly due to open as a Day Care Nursery, and there will be unacceptable danger to children and older people as a result of large towing vehicles and caravans manoeuvring in this area. With the above in mind, any proposal to develop a joint entrance to Ellsbridge House and this site would be totally unacceptable, not to mention extraordinarily dangerous for Ellsbridge House users. Development of the site will require the relocation of a well used bus stop.

Respondent: 3321 / 1 Name: Ms Elizabeth Palfrey Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

I am unhappy with the councils description of the site as being "flat land covered by dense vegetation". There are many trees on this site, beautiful trees that are homes to birds and animals and enhance the grounds of an historic Grade II listed building.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No it should not

Do you have any other general comments on the Preferred Options paper?

The site should not become a gypsy and traveller site because it is so close to the very busy A4. This road links Bath to Bristol it is extremely busy around rush hour. The entrance to the site is very narrow and on exiting the site, visibility is poor. Many years ago it was an adult education centre and there was a sign at the exit advising students to turn left onto the A4 as there had been a number of accidents caused by drivers turning right onto the A4. Making the bus stop would inconvenience the residents of Changdag Estate. As the Y39 is the main bus link for Keynsham to Bath.

Respondent: 3322 / 1 Name: Mrs B Grant Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

1. It is a small site without room to expand.
2. It is a most prominent position on the main A4 road connecting Bristol and Bath, which will openly degrade Keynsham's long establish schools and businesses.
3. It is now an attractive woodland of established trees, hiding the industrial buildings behind. This woodland would be destroyed.
4. It would share site with a Grade II listed house where a most welcome nursery is opening in Sept. That business would be destroyed.
5. The property value of 20 houses directly across the road would immediately be destroyed.
6. In total is would loudly proclaim that Keynsham is not a viable place to live and work. Is that your intention?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

NO NO NO!

Do you agree that the potential pitch provision be taken forward as a formal allocation?

NO NO NO!

Do you have any other general comments on the Preferred Options paper?

If these "Travellers" chose their way of life- and for some reason must be financially supported in that by us the tax and rate payers- is it not too much to expect by that they be accommodated in:-

1. The most unobtrusive physical location
2. The location with the least impact on the environment
3. The location with the least impact on residences, businesses and schools.

Respondent: 3322 / 1 Name: Mrs B Grant Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

YES

Re: Keynsham

- 1) It is a small site without room to expand
- 2) It is a MOST PROMINENT POSITION in the main A4 road connecting Bristol and Bath which will openly DEGRADE Keynshams long established residents, schools and businesses.
- 3) It is now an attractive thick woodland of established trees hiding the industrial buildings behind. This woodland would be DESTROYED.
- 4) It would share 'site' with a Grade 2 listed house where a MOST WELCOME childrens nursery is opening in Sept. That business would be DESTROYED.
- 5) The property value of 20 homes directly across the road would immediately be DESTROYED.
- 6) In total, it would loudly proclaim that Keynsham is not a desirable place to live and work. Is that your intention??

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

NO NO NO !

Do you agree that the potential pitch provision be taken forward as a formal allocation?

NO NO NO !

Do you have any other general comments on the Preferred Options paper?

If these "travellers" choose their way of life - and for some reason must be financially supported in that by us, the tax and rate payer - is it not too much to expect by us, that they be accomodated in:

1. The most inobtrusive physical location
2. The location with the least impact on the environment
3. The location with the least impact on residences, businesses and schools.

Respondent: 3332 / 1 Name: Mr Kevin Stammers Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No, I disagree strongly with the Councils assessment process. The site did not score well in the councils assessment matrix and yet the site has been elevated into a top six for possible selection. Question 1. Why was this?

The following points must be taken into account and reviewed fully:

1. This site is not suitable for a Gypsy and Traveller Development due to its location adjacent to a busy and noisy highway.

**Schedule of comments: GT.14 Land near Ellsbridge House, Keynsham**

Because of the unsuitability of shared access, a new access would be essential, a costly process that would involve relocating the bus stop which serves the pupils of Wellsway School. There is no obvious site for a relocated bus stop within a reasonable distance of the school. The A4 Bath Road is already a constant flow of traffic and may not be able to sustain a junction with movement of heavy vehicles, caravans and trailers so close to the adjacent roundabout.

2. The land in question is densely wooded with mature trees, including oak. Extensive tree surgery and excavation would be necessary to prepare it for any form of dwelling. The sheer amount of work involved in excavation and installing services will have great financial implications and disruption around that area of the busy A4 Bath Road.

3. Ellsbridge House itself is a Grade II listed building and therefore it is very important that any development does not impact negatively on this building.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No, we just do not think the potential location is good enough as a dwelling. My family and I have just moved into 128 Bath Rd after purchasing it in April 2012. Opposite the potential site, our house is setback from the A4 and our first impressions are noise levels. The background noise is constant with vibrations caused by passing heavy traffic. This is in a brick-built house with good quality double glazing! The potential pitch is much closer to the A4 than my house opposite and the level of sound insulation fitted in a mobile home will be much less than that of a cavity-wall insulated house. Question 2. Are the travellers aware of this irritant?

Secondly and personally most important is the impact of removing all those wonderful mature trees that currently screen the industrial estate directly opposite. We paid well over £300,000 for our lovely new home and we were not informed of any of the councils proposals and plans when local searches were conducted. Because of this, we feel cheated and let down by the elected council that serves us. The view of an industrial estate and travellers site can only reduce the desire to purchase our property in the future. Please can our all the points raised be heard and can we have genuine answers to our questions 1 & 2 as above?

Do you have any other general comments on the Preferred Options paper?

Please focus your comments on planning issues, national and local policies, government guidance and best practice for Gypsy and Traveller sites.

Respondent: 3334 / 1 Name: Mr Stephen & Peliza Sallyann Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

GT14: Land near Ellsbridge House, Keynsham

This site is adjacent to the busy A4 and by a roundabout. It is unsuitable for residential use due to excessively high road traffic noise levels. This is especially so if the development of the proposed residences do not (or cannot be made to) mitigate adequately against external noise.

Development of this site for residential use is contrary to National Planning Policy Framework NPPF (and PPG24 Guidance) and to Policy D2 of the BANES Local Plan (adopted Oct 2007).

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No. See above.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No. See above.

Do you have any other general comments on the Preferred Options paper?

No. See the above which addresses planning issues, national and local policies, government guidance for residential

development.

Respondent: 3335 / 1 Name: Mr Royston L. Burridge Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

Concerning the proposed 'Gypsy and Travellers Site' to be adjacent to 'Ellsbridge House' Keynsham - I object to this proposal on the following grounds.

- 1) The A4 is an extremely busy road and at peak times, traffic builds up 'nose to tail' from Saltford to the Keynsham 'round-about,' especially when Cows cross the road betwixt Saltford & Keynsham at certain times. This scenario would be exacerbated, by Caravans & Lorries to and from the proposed site!
- 2) Also, I think that the council has not taken into account, the impact this proposal would have upon all the businesses that are nearby, Such as 'The Co-op,' 'Dominoes,' 'Jewsons,' and indeed the Councils own 'Recycling Site' and other businesses in the immediate area.
- 3) To put this proposal next to a 'Nursery School' will not only 'Blight' the school, but could lead to problems where young children could be at the least intimidated by 'Dogs,' since most Gypsies and Travellers' do seem to have more animals 'pro-rata' than the general population.
- 4) In our opinion the proposed destruction of mature trees at the site is nothing more than environmental vandalism by the authorities.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 3347 / 1 Name: Mr N Ryan Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

I would like register my strong objections . To propose this site in what is a built up area is absurd , it will undoubtedly reduce property values , if indeed properties could be sold at all next to a gypsy travellers site , and also there is a childs nursery right next to the proposed site , also the possable increase in cleanliness which has been proven on other sites of this nature is a major concern , I would like to reiterate my strong objections to this proposal ,

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 3424 / 1 Name: Ms Patricia Emery Organisation:

Schedule of comments: GT.14 Land near Ellsbridge House, Keynsham

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No.

Do you have any other general comments on the Preferred Options paper?

I feel that the situation is totally unsuitable, particularly the access and also would not wish to see the removal of the mature trees on and around the site. I think there would be many traffic issues.

Respondent: 3428 / 1 Name: P.A. Roberts Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

I should like to voice my objections to the proposal to have a permanent site for gypsies and travellers in the Broadmead roundabout/Ellsbridge House area of Keynsham.

As the owner of a caravan, and fully appreciating the amount of space required to obtain access to/egress from such a site, I believe the proposed site to be completely unsuitable. The problems it would generate for other road users would be enormous, particularly if vehicles needed to access or leave the site during peak periods. As it is, the build up of traffic in this area can be such that vehicles are backed up along the by-pass, with the roundabout becoming an area for aggressive behaviour and poor driving. Had a full and proper traffic survey been undertaken I believe this would have immediately become apparent.

In addition to this we have already had to put up with fast food outlets in the area, generating rubbish as they inevitably do, why should we now have to put up with the loss of our trees which gave us at least some semblance of country living. Whilst none of us is disputing the need for travellers' sites I am dismayed that such little thought has gone into such an important decision. Please, please, please think again

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 3429 / 1 Name: Mr Andrew Payne Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

In response to the proposed GT14 site, I consider this a very unsuitable site due to the fact that there is a child's nursery situated next door to this site and I feel this would put children that have been left there in a vulnerable situation. I also feel that a secondary school situated opposite there would be a constant problem between the two.

There is also a T/A centre based next door and with this being an M.O.D building with thousands of pounds worth of heavy vehicles and machinery left overnight would have considered this again unsuitable.

Please re - consider your proposal for this site as I strongly feel this would not be suitable.

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No as per my previous comments.

Do you have any other general comments on the Preferred Options paper?

Respondent: 3432 / 1 Name: BA Hewitt Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

NO. Too superficial. The important issues are:-

- 1) Unsafe access and exit onto/from a very busy road immediately following a fast roundabout
- 2) Further risk of accident from unsupervised animals or children close to busy road
- 3) Unacceptable destruction of mature woodlands and indigenous wildlife (animals, birds)
- 4) Adverse effect on Ellsbridge House that has been purchased for a childrens nursery. It's unacceptable and unfair to jeopardize a local business providing an essential service for Keynsham. There is also the risk of loss of jobs if the business was to fail.
- 5) Keynshams infra structure is already under pressure from 100's of "new builds" and influx of Council staff from Bath when new Council offices have been built. A gypsy/travellers site will increase this pressure further.
- 6) According to at least 2 reports from local press, both residents, travellers and even Tim Ball (BANES LIB/DEM COUNCILLOR in charge of Planning) have stated that sites should be "away from properties" and not in residential areas. Refs Bath Chronicle April 26th and Keynsham local paper "Keynsham Voice" a BANES resident with links to the travelling community said that travellers did not want to live where they are not welcome, and would not choose residential areas. I'm sure that by now the Lib/Dem Labour Coalition group realise the above issues. For once they should listen to the people who elected them to office and remove Ellsbridge House site from the list and end all this uncertainty

Do you agree that the potential pitch provision be taken forward as a formal allocation?

NO

Do you have any other general comments on the Preferred Options paper?

This whole process has been poorly communicated to the public and local councillors alike. To find out that this exercise has been ongoing for over 2 years but has been 'hidden' until approx 4 weeks before an 18th July deadline for comments is worrying. It is also of concern that the process is badly flawed. For Keynsham and Stanton Drew proposed sites to be shortlisted in top 6 after the initial review of 23 sites placed them well down the list (15th & 17th ) there is something very wrong here!

Respondent: 3442 / 1 Name: MD Broom Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

- 1) The Keynsham site proposed entrance is not suitable and could be Dangerous for Strangers
- 2) What happens to the trees and wildlife on the proposed site
- 3) Have the local residents been considered? No

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No

Do you have any other general comments on the Preferred Options paper?

This area is not suitable for a Gypsy Traveller site

Respondent: 3443 / 1 Name: Mr Ian Mills Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Ellsbridge House, Keynsham

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No

Do you have any other general comments on the Preferred Options paper?

Unsuitable due to access onto A4 and impact on listed building not compatible with childrens nursery.

Respondent: 3446 / 1 Name: Mr Peter Ward Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Keynsham Traveller Site proposal

With regard to this proposal for the Keynsham site at Ellsbridge House we have a number of objections.

1. As long term residents of Saltford we are familiar with the proposed site. At first glance it seems totally unsuitable and even after reflection this view remains. This proposed site is adjacent to a very, very busy roundabout on the A4 trunk road with over 28000 vehicles per day. In addition traffic is exceptionally heavy around school times, with the Wellsway School complex very close, this in addition to the normal morning and evening rush hours.

2. A new children's nursery business is due to open next to the proposed site. A traveller's site next door would be disastrous due to the perception of such sites, real or imagined. Unfortunately this is a fact of life and we feel very sorry for the new owners if this proposal were to go ahead. We don't know them personally.

3. That the proposal involves the destruction of 150 trees is ecological vandalism pure and simple and we are amazed the Council proposed such a thing. In a largely rural constituency like Banes there MUST be more suitable sites without these drawbacks.

Summary: This site is so unsuitable we just cannot believe it is being seriously proposed. We have also read that on the original survey it ranked 16th, and yet somehow is now in the top six. Unfortunately this seems to imply influence having been brought to bear by unspecified but obviously influential parties

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No

Do you have any other general comments on the Preferred Options paper?

Surely this site does not meet planning outlines nor best practice

Respondent: 3448 / 1 Name: L Denning Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

NO

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

NO

Do you agree that the potential pitch provision be taken forward as a formal allocation?

NO

Do you have any other general comments on the Preferred Options paper?

Respondent: 3449 / 1 Name: A Denning Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

NO

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

NO

Do you agree that the potential pitch provision be taken forward as a formal allocation?

NO

Do you have any other general comments on the Preferred Options paper?

Respondent: 3460 / 1 Name: Mr Derek McCaig Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Ellsbridge House Keynsham

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

1) It appears that if this site is accepted, the cost to the rate payers would be very, very high in relation to other sites suggested

2) Disruption to local residents with suggested shared drive and access

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No

Do you have any other general comments on the Preferred Options paper?

Respondent: 3466 / 1 Name: Ms Patricia Morrison Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

I feel that the existing site at Newbridge, tucked away from the main road with a lane approach is ideal for travellers leaving the site. They can negotiate the lane slowly with plenty of time to assess the traffic before entering the main traffic flow. This would not be the case with Ellsbridge House!

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

Due to extreme difficulties trying to access this site I am unable to comment

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No. My reasons are as follows:

- 1) The site gives onto one of the busiest roads in the entire area. It is just beyond a roundabout that marks the end of the fast Keynsham bypass. Also entering this roundabout is the exit from the COOP supermarket, and two fast food stores. The next entry is the main road out of Keynsham leading to Bath.
- 2) School children coming and going to the bottom entrance of Wellsway School which, because it supports a 6th form, can be any time of day. Picking up and dropping pupils is an enormous activity.
- 3) Give the Governments very recently published intention to reforest areas of the country which is so badly depleted of trees, how can no consideration have been given to the felling of ONE HUNDRED & FIFTY mature trees? This is an abomination!
- 4) Finally and most importantly, with a nursery having just been granted planning permission, how on earth can this be made a safe area to supervise the youngest of children when large vehicles using the same entrance could be reversing and entering this site at the same time as young mothers and their offspring. It is indefensible.

Do you have any other general comments on the Preferred Options paper?

Respondent: 3480 / 1 Name: Mrs G H Orley Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

**SECTION 1: THE CURRENT WOODLAND SITE.**

- 1.1: The Site Description.
- 1.2: A District currently living in Harmony.
- 1.3: A Woodland Haven for Wildlife and a Protected Species.
- 1.4: Woodland Protects against Air Pollution and 'Urban Heat Island Effect'.

**SECTION 2: SAFETY ON THE GT.14 SITE IF IT WAS DEVELOPED.**

- 2.1: Would you want to live on an Industrial Estate?
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### SECTION 3: MY SUMMARY.

- 3.1: Destruction of the Woodland.
- 3.2: Banes Council to account for National and EU legislation.
- 3.3: Banes Council ignoring their own Core Strategy Document.

### APPENDIX TO SECTION 3:

The Keynsham Site - Core Strategy Document objectives in tatters.

### SECTION 4: MY CONCLUSION.

- 4.1: The GT.14 proposed site.
- 4.2: The next step.

### SECTION 1: THE CURRENT WOODLAND SITE

#### 1.1: THE SITE DESCRIPTION

I have seen Banes Council describe the site as:

- Redundant Land.
- Flat land covered in dense vegetation.
- Spare land.

It is none of these. This is living dense woodland of mainly native British broadleaf trees. This woodland was originally part of the adjacent Grade 2 listed Ellsbridge House estate. The original woodland is probably in the order of 100 to 150 years old with new generation having taken place during its lifetime.

#### 1.2: A DISTRICT CURRENTLY LIVING IN HARMONY

- a. To some Banes Councillors and some planners this may be just a piece of land which the council now want to develop. To us this woodland is the living heart of this district and community. It is in such a strategic position its destruction would have a devastating impact on everybody and everything living in and passing through the district.
- b. The woodland allows the local community and the thousands of people who pass through this district every day on foot, by cycle, by car, by bus to live in harmony with the large industrial estate which lies to the north of the woodland. We all know the industrial estate is there but its ugliness and noise is hidden away by the protection this small dense woodland provides for everybody year in and year out.
- c. The woodland is a natural extension of the Grade 2 listed building Ellsbridge House and its grounds. The woodland sits comfortably in a prominent position providing an essential link in the A4 green corridor towards the City of Bath.
- d. Destruction of the woodland will destroy all this vital harmony for evermore for everybody and everything.

#### 1.3: A WOODLAND HAVEN FOR WILDLIFE AND A PROTECTED SPECIES

- a. The woodland is a relatively small 0.3 hectares haven for wildlife and also acts as an essential A4 northern side wildlife corridor around the industrial estate. It is a haven for many species of birds. It is almost certainly a sanctuary for bats which are a protected species under UK and EU law. We have observed bats flying in the vicinity of this woodland and over our nearby garden for the last 30 years.
- b. Destruction of the woodland would destroy a bird and wildlife habitat and would destroy a wildlife corridor which is in conflict with National statutory policy (see footnote F1 and F2 at the end of this section 1).
- c. Destruction of the woodland would destroy a protected species habitat (bats) which is in contravention of UK and EU law. Banes Council would be obligated to carry out a full protected species survey of the whole woodland not just for bats, but because of the woodlands age and being relatively untouched, would be required to carry out a full survey for all species of native protected flora and fauna (see footnote F1, F2 and F3 at the end of this section 1). If such a survey is carried out I request a copy be made available to me under the Freedom of Information Act.

#### 1.4: WOODLAND PROTECTS AGAINST AIR POLLUTION AND ‘URBAN HEAT ISLAND EFFECT’.

a. A 2011 detailed and comprehensive survey report by the Woodland Trust (see footnote F4 at the end of this section 1) identifies studies which prove the general input of trees to air quality is overwhelmingly positive. There is evidence trees remove large amounts of air pollution which includes pollution from road vehicles. It has also been proved tree cover including small woodlands help to mitigate the air pollution caused by the ‘Urban Heat Island Effect’. This occurs in areas where there are a lot of buildings, concrete, other hard surfaces and roads. These all act as giant storage heaters during the day and then release the heat at night. A large release of heat after a hot day dramatically increases ground level ozone levels at night which can exacerbate the symptoms of chronic respiratory conditions.

b. The above is very relevant to the GT.14 proposed Gypsies/Travellers site at Ellsbridge Keynsham. With all the woodland destroyed the unfortunate occupants of the site could well be subjected to the very polluting conditions as identified in the Woodland Trust Report. The site would have the great mass of the existing Ashmead Road Industrial Estate right alongside it on the Northern Boundary. The industrial estate has lots of concrete, lots of large buildings, lots of roofs with large surface areas which will soak up a huge amount of heat on a hot day. These are ideal conditions for a dangerous increase in ground level ozone at night created by the ‘Urban Heat Island Effect.’ Not good news for any unfortunate occupants living in the pocket of the GT.14 site who may suffer from respiratory health problems. Likewise on the long Southern boundary of the site with the woodland destroyed there will be no protection from the air pollution caused by the thousands of vehicles passing on the A4 each day directly alongside the GT.14 site pocket. Site occupants who do not have respiratory health problems could soon have them if they stayed on that site.

c. The existing small woodland helps to mitigate these problems and helps protect all those who live in the district and pass through. It would be a gross act of irresponsibility if this woodland was destroyed by our own Banes Council.

#### FOOTNOTES FOR SECTION 1:

F1: The Natural Environment and Rural Communities Act (NERC Act) 2006 requires public organisations including local authorities to consider biodiversity in all their functions and is a statutory requirement for local authorities.

F2: General planning policy statement No9 protects small woods where they function as stepping stones between wildlife areas, they are essential for animals and plants to move between sites.

F3: As well as being protected by UK and EU law all local authorities are obligated by law (NERC Act 2006) to make sure they have all the information on the presence of protected species on site before they make a decision on planning permission.

F4: The Woodland Trust – The State of the UK’s Forests, Woods and Trees – Report to mark the International Year of Forests 2011.

#### SECTION 2

##### SAFETY ON THE GT.14 SITE IF IT WAS DEVELOPED

###### 2.1: WOULD YOU LIKE TO LIVE ON AN INDUSTRIAL ESTATE?

Let us make no mistake about what this means for Gypsies/Travellers occupants of the site. With the woodland destroyed the Gypsies/Travellers will not be living near to an Industrial Estate they will be living on an Industrial Estate. Just look at any Google map plan of the district which shows the GT.14 site and the Industrial Estate. It becomes blatantly obvious that destruction of the woodland will bring the Industrial Estate to the very edge of the A4 Trunk Road. The Gypsies /Travellers Site will be part of it.

###### 2.2: HEALTH AND SAFETY ISSUES ALREADY KNOWN

Banes Council in the ‘Preferred Sites Assessment Document’ have clearly acknowledged the GT.14 site is not suitable for a Gypsies/Travellers site for a number of reasons:

a. The site on its long northern boundary is directly adjacent to a large established Industrial Estate. See 2.1 above. This does not meet the laid down criteria for the Health and Safety of site occupants.

b. The site will suffer from unacceptable noise problems from the heavily trafficked A4 Trunk Road on its long Southern Boundary.

c. The site has a very serious Highways Safety access problem which the Banes Council are currently attempting to mitigate.

#### **2.3: HEALTH AND SAFETY ISSUES NOT TAKEN INTO ACCOUNT**

The assessment conducted by Banes Council has not taken into account some other very serious Health and Safety issues:

a. With the woodland destroyed the site occupants could be subjected to serious air pollution by day and dangerously high levels of ozone at ground level at night. The threats are from:

- The heavily trafficked A4 on the sites long Southern boundary – serious air pollution by day entering the GT.14 site pocket.
- Effects of ‘Urban Heat Island Effect’ from the Industrial Estate directly on the long Northern Boundary – at night dangerously high levels of ozone building up in the GT.14 site pocket.

Both of these are covered in detail in Section 1.4 of this response.

b. Young children on the site if not constantly accompanied or supervised by an adult will be at serious risk of injury or death if they wander out onto the A4 Trunk Road. Access to the heavily trafficked A4 would be easy. Banes Council are attempting to justify a new big and dangerous site access from the A4 straight into the site. This continuous worry and care for the safety of their children could put a big mental and physical daily strain on site parents.

### **SECTION 3: MY SUMMARY**

#### **3.1: DESTRUCTION OF THE WOODLAND**

Destruction of the woodland would be a total disaster:

It would have a massive detrimental and permanent impact on the landscape of the district and destroy a strategic and highly visible link in the A4 green corridor which goes through Saltford all the way to the Heritage City of Bath.

It would destroy the harmony of the whole district which the woodland provides by keeping the ugly Ashmead Industrial Estate at bay. Without the woodland it will bring the Industrial Estate all the way out to the edge of the A4.

It would destroy a wildlife habitat and an important wildlife corridor around the Industrial Estate on the Northern side of the A4.

It would destroy a protected species sanctuary. There is strong evidence bats reside and roost in the woodland.

Without the woodland it would destroy the highly effective means of keeping A4 traffic air pollution under control in the local district.

Without the woodland there is a real risk the GT.14 site pocket could be subjected to the dangerous phenomenon of ‘Urban Heat Island Effect’ with a build up at night of dangerously high levels of ozone at ground level. Without the woodland the conditions provided by the directly adjacent Industrial site and the A4 Trunk Road are just right for it after a hot day.

All of the above issues are covered in greater detail in SECTION 1 of this response.

#### **3.2: BANES COUNCIL TO ACCOUNT FOR NATIONAL AND EU LEGISLATION**

If the woodland was destroyed it would require Banes Council to either ignore or negate National and EU legislation in relation to protection of woodland, wildlife habitat and protected species. It would also require Banes Council to ignore the warnings given by a well respected British institution ‘The Woodland Trust’.

These issues are covered in greater detail in SECTION 1 of this response.

#### **3.3: BANES COUNCIL IGNORING THEIR OWN CORE STRATEGY DOCUMENT**

a. I believe the Banes Council Core Strategy Document is currently with the Government Minister for approval. Under Objective 2 (Growth) the document includes statements under Key Strategy Issue paragraph 1.12 that:

- Growth must not occur at any cost.
- Trees and woodlands make a huge contribution towards the attractiveness and liveability of the District.
- In all areas it is vital any new development enhances the characteristics that makes Banes such a distinctive District and protects natural and built environment that supports the quality of life enjoyed by its community.

This does not make good reading for Banes Council when they are proposing the complete destruction of broadleaf woodland in the Ellsbridge district of Keynsham in order to develop a Gypsies/Travellers site. The woodland probably in the order of 100 to 150 year old was once part of the lodge grounds of the Historical Grade 2 listed building Ellsbridge House. Banes Council have already acknowledged the proposed site will have a considerable impact on the Historical Grade 2 listed building. For more uncomfortable reading in relation to the Banes Core Strategy Document please see the attached APPENDIX TO SECTION 3: The Keynsham GT.14 site – Banes Core Strategy Objectives in Tatters.

b. If Banes Council insist in going ahead with the proposal to destroy the woodland and develop the land into a Gypsies/Travellers site they will be breaking every promise and objective of their own Core Strategy Document as described and identified above at paragraph 3.3a including the 'APPENDIX TO SECTION 3'. Destruction of the woodland will not be the fault of the Gypsies/Travellers community. I am sure they respect the necessity to retain long established natural woodland and its wildlife. The responsibility for an act of wanton destruction, which would be nothing less than corporate vandalism, will lay firmly with the current Banes Council. The question is what would be achieved by this destruction. The answer is a site which would be poor quality and unsafe for the Gypsies/Travellers. The site is completely in the wrong place, has a serious Highways safety access issue, and has very real and serious Health and Safety Hazards. Banes Council assessment document has stated the site is not suitable for a Gypsies/Travellers site. Why not leave it at that.

#### APPENDIX TO SECTION 3: THE KEYNSHAM GT.14 SITE – CORE STRATEGY OBJECTIVES IN TATTERS.

Attached at the end of this response.

#### SECTION 4: MY CONCLUSION

##### 4.1: THE GT.14 ELLSBRIDGE KEYNSHAM PROPOSED SITE

a. I understand and respect that the Council has a Government imposed duty to provide for Gypsies/Travellers sites within Banes. I also understand this is not an easy task. However sites should be assessed and chosen very carefully and not be chosen just because they are there and available. This seems to be very much the case for the GT.14 preferred site in Keynsham. It came very low down the list of original possible sites identified in the Council assessment study. It was recognised by the Council as not being suitable for a Gypsies/Travellers site and yet has finished up as one of six preferred sites. That defies the laws of logic. It sits more comfortably as an act of desperation.

b. I have presented a factual case why the GT.14 Ellsbridge, Keynsham site is a really bad choice. It is bad for everybody, everything and bad for the Gypsies/Travellers community themselves.

c. I respectfully request Banes Council to think again on the GT.14 Ellsbridge, Keynsham site. Come to terms with reality, apply common sense and rescue your Core Strategy Document from just being hollow words and broken commitments. Please remove the GT.14 site from the preferred site list now. In fact with the multitude of very serious issues this proposed site is raising I would suggest it should go onto your 'No Go' list.

##### 4.2: THE NEXT STEP

a. With all the arising issues in relation to the existing woodland at the Ellsbridge, Keynsham site I request the Council shows some understanding and leadership by taking another step forward. Please recognise the essential, strategic and multi functional role the small woodland provides for the harmony and good of the whole district and its wildlife.

b. The woodland has protected and enhanced the quality of life not just for the local community but for the communities of Keynsham and Saltford and all who pass through the district along the A4 green corridor to the Heritage City of Bath.

c. It is now time to give something back and protect the old woodland from the creeping erosion from the Industrial Estate hidden just behind it. It is now time to stand up and meet your Core Strategy Document objectives in relation to multi functional woodland. Please give authority for the Banes Trees and Woodlands Officer Jane Brewer to take action to place a tree preservation order on the whole woodland.

## APPENDIX TO SECTION 3

### KEYNSHAM GT.14 SITE – CORE STRATEGY OBJECTIVES IN TATTERS

1. Ensure growth and development takes place within the environmental capacity of the District.

This district cannot take any more development. We currently have a fragile harmony in the district with the old woodland providing multi function protection from a large Industrial Estate which hides behind it.

The BANES COUNCIL proposal is to DESTROY a 100 year old but healthy native broadleaf WOODLAND in order to turn the land into a Gypsies/Travellers site. This is despite BANES COUNCIL acknowledging in their own assessment document that this location does not meet the Health and Safety requirements for a Gypsies/travellers site.

2. Help to conserve and enhance the quality and character of our built and natural heritage.

BANES COUNCIL acknowledge in their own assessment document destruction of the woodland and turning the land into a Gypsies/Travellers site will impact on the adjacent Historical Grade 2 building Ellsbridge house. So much for the BANES COUNCIL objective of conserving and enhancing the quality of our built and natural heritage.

3. Maintain and enhance an accessible and multi functional network of well linked green spaces.

BANES COUNCIL wants to destroy a broadleaf woodland. It provides multi functional protection for the local district and its wildlife. It is a green link in the A4 green corridor towards the Heritage City of Bath.

4. Help to conserve, enhance and restore the diversity and resilience of the District wildlife.

BANES COUNCIL is proposing the destruction of wildlife habitat and protected species (bats) sanctuary. There is evidence bats reside in the woodland BANES COUNCIL are proposing to destroy. Harming protected species is in contravention of UK and EU law.

5. Help to avoid water, air, light and noise pollution.

The BANES COUNCIL proposal to destroy woodland will increase air and noise pollution. The broadleaf woodland currently helps absorb the polluting effects of heavy A4 traffic in the local area.

6. Capitalise on the role of our heritage in promoting local distinctiveness.

The BANES COUNCIL proposal to develop the land at ELLSBRIDGE KEYNSHAM will certainly capitalise in promoting local distinctiveness. It will affect the people of Keynsham and Saltford and all who pass through. Instead of a broadleaf woodland we will all be opened up to the full ugliness of a large Industrial Estate. The Gypsies/Travellers community should be made aware if the BANES COUNCIL proposal goes ahead they will not be living next to an Industrial Estate they will be living on an Industrial Estate.

Respondent: 3483 / 1 Name: Ms Sheila Crocombe Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

The constraints listed for this site would seem to heavily outweigh the consideration of the site as an opportunity. Broadmead roundabout is already very difficult to negotiate! Adding serious vehicle movement to this mix is a recipe for fatalities. Mature trees should not be removed.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Absolutely not.

Do you have any other general comments on the Preferred Options paper?

Respondent: 3493 / 1 Name: S McCaig Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No. Traffic, access, safety and environmental issues have all been underplayed.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No.

Do you have any other general comments on the Preferred Options paper?

I consider the consultation process so far has been dreadful. There is NO INDICATION on the High Street that this consultation is even on.

Respondent: 3493 / 2 Name: S McCaig Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

GT 14:

- The site shown is larger than the actual site.
- The boundary is incorrect.
- It is not suitable for 6 permanent and 15 temporary sites.
- The main road is dangerous.
- Access to business premises is too close.

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Consider -

GT1 is suitable as is already occupied

GT8 is suitable if a permanent resident warden is on site and residents undertake to keep the area clean and free of rubbish/tipping

GT14 would be expensive to prove suitable areas and would be difficult to see 6 vans could be accommodated without damaging the wealth of mature trees on site. It is totally unsuitable for any transit sites.

Respondent: 3497 / 1 Name: Ms Caroline Smithies Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

Not entirely. Underestimate the safety issue in assessment to gypsies, travellers, employees, residents and general public due to site being positioned on a busy highway and close to a roundabout. Right turning from Ellsbridge on to A4 is dangerous. In fact there used to be a sign stating "No right turn". Council states that entrance either shared within Ellsbridge house or another entrance on Bath Road. However, Highways Authority have stated in past would not allow another one so close to roundabout.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

NO

- 1) One of the Councils criteria for selecting a site is "good site access from an adequate or good standard of road". Although a good standard shared access would engender a health and safety problem on site to travellers, employees, visitors and general public walking along pavement due to large vans, lorries and trailers entering and leaving. No Highways feasibility study has been carried out.
- 2) Compatability with Grade 2 listed building?
- 3) Council states in criteria for selecting sites "would it have been an unacceptable impact on the green belt or on landscape". This would impact on the later. The felling of approx 150 trees although barbaric in itself would expose travellers, gypsies, residents and general public to the industrial areas behind. This part of A4 is important in the lead up to entering Bath, a World Heritage site, and would create a negative perception
- 4) Basis on which site chosen is floored as matrix scoring low 15 but still recommended

Do you have any other general comments on the Preferred Options paper?

Respondent: 3502 / 1 Name: Mr Keith Poulter Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Definitely not.

Do you have any other general comments on the Preferred Options paper?

The site is totally inappropriate due to the necessity to fell hundreds of mature trees. Also it should be adjoining a children's nursery. Access onto the main road is dangerous and unacceptable due to the large volume of traffic passing.

Respondent: 3507 / 1 Name: J Nicholson Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No. See comments below

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No. See comments below

Do you have any other general comments on the Preferred Options paper?

I do not agree with the assessment of this site that has been carried out to date on the following grounds:

1. The proposed site is not suitable for habitation by families with young children as it is sandwiched between a busy de-trunked A road and a refuse sorting facility.
2. The mature trees on the site provide a screen from the refuse facility for residents and visitors to Keynsham. This is a relatively scarce piece of green land in this vicinity and it is currently providing a useful function.
3. The proposed site which originally formed part of the Ellsbridge House estate, has not been developed and does not therefore constitute a 'brown field' site.
4. The traffic density on this part of the A4, especially with regard to movement of large caravans mean that this site does not offer safe vehicular access without significant modification of the road network to accommodate it.
5. Guidance to Local Authorities for planning for Travellers demands that sites need to accommodate not only the accommodation needs of this group of people, but must also make provision for them to carry on a business at that site if they so desire. There is no provision in the proposal that caters for the additional traffic that will be created, nor is there any recognition of the need to store or house tools and equipment of various trades to support these businesses.
6. The access to Public transport has been assessed as good, but the current proposals will entail the removal of the bus stop in that vicinity and its re-siting some distance further along the A4 towards Saltford.
7. The assessment of access to Schools and Doctors takes no account of the necessity of crossing the A4 at this point on foot, which is hazardous for the able bodied and by definition, more hazardous still for school age children or sick people.
8. I do not believe that the council have taken into account the needs of this group of people adequately in the selection of this particular site, but merely seeks to shoehorn them into a vacant plot of land.

Respondent: 3508 / 1 Name: Mr J Board Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No

Do you have any other general comments on the Preferred Options paper?

Considering the current climate towards environmental awareness and the importance of keeping green spaces, I feel the felling of so many trees would be completely at odds with this thinking.

Shared access between the site and nursery onto a main road seems to be an accident waiting to happen! The combination of heavy traffic and small children will never work whatever measures are put into place. The Bath Road is already frequently congested around the adjacent roundabout, any further development will inevitably add to this.

What environmental surveys have been done on the flora and fauna in this area?

These are only a few of the objections that immediately come to mind. I'm sure if this was given due consideration at committee many more flaws to this site would become evident.

Respondent: 3509 / 1 Name: Mr N Hazell Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No

Do you have any other general comments on the Preferred Options paper?

Considering the current climate towards environmental awareness and the importance of keeping green spaces, I feel the felling of so many trees would be completely at odds with this thinking.

Shared access between the site and nursery onto a main road seems to be an accident waiting to happen! The combination of heavy traffic and small children will never work whatever measures are put into place. The Bath Road is already frequently congested around the adjacent roundabout, any further development will inevitably add to this.

What environmental surveys have been done on the flora and fauna in this area?

These are only a few of the objections that immediately come to mind. I'm sure if this was given due consideration at committee many more flaws to this site would become evident.

Respondent: 3510 / 1 Name: Mr S Kierk Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No

Do you have any other general comments on the Preferred Options paper?

Considering the current climate towards environmental awareness and the importance of keeping green spaces, I feel the felling of so many trees would be completely at odds with this thinking.

Shared access between the site and nursery onto a main road seems to be an accident waiting to happen! The combination of heavy traffic and small children will never work whatever measures are put into place. The Bath Road is already frequently congested around the adjacent roundabout, any further development will inevitably add to this.

What environmental surveys have been done on the flora and fauna in this area?

These are only a few of the objections that immediately come to mind. I'm sure if this was given due consideration at committee many more flaws to this site would become evident.

Respondent: 3511 / 1 Name: Mr Duncan Tyler Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

I would like to express my objection to the location of a travellers site at the above location. I hear it will result in the loss of woodland. Keynsham is fast losing its countryside both through large developments such as K2 and smaller development chipping away at it. If we are not careful in a few years Keynsham will be sucked into Bristol!

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

Respondent: 3517 / 1 Name: Mr Derek Baker Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No, I do not agree with the Council's assessment of this site.

The detailed assessment, (Appendix E) gives a fairly accurate assessment of the GT.14 site and the practicalities and safety aspects associated with establishing a Traveller's site there. On balance, the points made in the assessment, indicate that the GT.14 site is not suitable for further consideration, yet the assessment's recommendation concludes that the significant negative factors can be overcome with "mitigation works", subject to agreement.

I have listed below my concerns over the suitability of the GT.14 site.

The site is bounded to the north by the industrial estate. The council's own assessment makes reference to the unsuitability of locating Traveller's sites adjacent to industrial developments, yet this factor has been overruled.

To the south, the site is bounded by the A4, one of the busiest roads in the region. The section of road nearest the roundabout is subject to a 60 mph speed limit, with a transition to a 40 mph speed limit approximately half way along the boundary of the site. Traffic in this section of the road is dense and moving quickly. There is very poor visibility of traffic approaching from the roundabout and heading towards Bath/Saltford. I have lived opposite the site for 17 years and have witnessed many accidents on this stretch of road. Stationary traffic can occur at any time of the day. The only place where vehicular access could be established for the GT.14 site would be along this very hazardous stretch of road. While trying to access the site, large, slow vehicles, towing large overhanging loads, would pose an unacceptable risk to both the Travellers and other road users.

No actions should be taken which will increase the risk of accidents and injury on this section of the A4. Therefore the GT.14 site should not be developed as a Travellers' site.

The hazards associated with joining and leaving the A4, along this section of road, were well recognised when Ellsbridge House was part of Norton Radstock College. A sign was displayed in the grounds, reminding drivers to only turn left when exiting the site, due to the dangers of attempting a right turn across a fast road with poor visibility.

Large vehicles with significant overhangs also have difficulty entering and leaving the Ellsbridge House site, due to the

variation in level between the road and the drive. The overhanging sections of such loads invariably make contact with the ground, often damaging the vehicle. Even today there are clear marks on the road, caused by such incidents.

Noise & vibration. As a resident who lives opposite the GT.14 site, I have first hand experience of the noise and vibration caused by the heavy A4 traffic. My house is brick built, has double glazing and is separated from the A4 by 30 metres of grass and a 3 metre high hedge. Even so, the traffic noise is noticeable at all times and at busy periods it is particularly noticeable. Once the trees are cleared from the proposed site, there will be nothing to screen the GT.14 site from the traffic noise as it borders directly on to the A4. The Travellers' mobile homes will be closer to the A4 than my house, but they will have less insulation to protect them from noise and vibration. This is not suitable for families, especially those with small children.

Atmospheric pollution. In addition to noise and vibration, proximity to the A4 also means that the SG.14 site will be subject to significant levels of vehicle exhaust emissions, such as carbon monoxide, nitrogen oxides, unburnt fuel, diesel particulate and heavy metal residues from catalytic converters. These factors should weigh heavily against the suitability of the site for families with children, especially those who suffer with respiratory problems, such as asthma.

If the existing trees are cleared from the GT.14 site, there will also be a detrimental impact on the children's nursery in Ellsbridge House. Not only do the trees provide a visual screen from the A4, and they also filter out noise, vibration and atmospheric pollution. If the GT.14 site is developed, both the Travellers' families and the children and staff at the nursery will suffer from these pollutants.

Schools. The local Keynsham schools are all fully subscribed. There is no capacity to accept additional pupils.

Bus stop. If relocated, as proposed as an option in the detailed site assessment, the new bus stop will be further from Keynsham than the existing stop. This will have a negative impact on pupils using the school bus service as well as Keynsham residents, who will have a longer walk to catch buses in the Bath direction.

Flood risk. The site scoring matrix (Appendix B) gives the site a neutral score for flood risk. The ground in the vicinity of the GT.14 site does not flood. However, the sewers in this section of the Bath Road do suffer from "hydraulic charging" during periods of very heavy rain. During a prolonged period of heavy rain, the sewer system can't cope with the volume of water entering the system and the water level increases from its normal level (more than 2 metres below ground level) to ground level. When this happens, the excess water can be seen overflowing through manhole covers along and adjacent to the A4, next to the GT.14 site. These conditions occur perhaps 3 times a year and they can cause problems with the normal drainage of household sewage. I have alerted Wessex Water to this problem on several occasions, so there should be records of these events. Developing the GT.14 site will increase the load on the sewer system, which may lead to increased frequency and/or severity of these events.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No the GT.14 site should be rejected as a possible candidate site. See comments in section A above.

Do you have any other general comments on the Preferred Options paper?

Respondent: 3521 / 1 Name: Mr Michael Watts Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

The site is right next to a very busy pinch point on the A4. Given the already high levels of traffic at this location I don't think it's very safe for motorists if there are slow turning vehicles, especially towing trailers, coming in and out at this junction. I assume the appropriate department, e.g. highways, has been instructed to perform a feasibility and impact study on the anticipated increase in traffic volume? If so, where can I get a copy of this report? Also I can't imagine it would be healthy, i.e. exhaust fumes and noise levels, to live on an open site right next to the A4.

The proposed location is also on a woodland. It seems very strange to cut down a significant number of mature trees when all other organisations and companies are focusing on being Eco friendly and trying to find ways of reducing their carbon footprint. There is also a substantial cost involved to prepare this site. Currently this woodland provides a beautiful 'green' entrance to Saltford and masks the industrial estate behind it. I think it also sets a dangerous precedent that cutting trees down is acceptable practice when developing land. Has the council requested an environmental study to be performed? i.e. the woodland may be home to rare plants and/or animals. Finally, I understand that the council is spending large amounts of money to make the entrance to Bath greener, i.e. the complete opposite to what is being proposed in Keynsham/Saltford.

The site is adjacent to the Snapdragons Children's Day Nursery and Out of School Club, which I believe was referred to as Ellsbridge House Management and Community Education Centre. Being a father of two young children I have a number of concerns to ensure the safety of the children attending the nursery. Will there be shared access between the nursery and the proposed site? If so, how can the nursery ever secure their site? This is a key consideration when choosing a nursery and I assume a significant point from an Ofsted report. I would anticipated a high volume of traffic using this access point making it very dangerous for young children.

Finally, I wonder if the council has approached anyone from the travelling to community to ask whether they feel this is a suitable site? Would they want to live next to a busy A road on one side with access issues and an industrial estate on the other?

Therefore I feel that the proposed site is wholly unsustainable primarily due to the location next to the noisy, busy and dangerous A4. Also the cutting down of a significant number of mature trees at a significant cost, which will ruin the 'green' entrance and destroy the habit for potentially rare plants and animals.

Respondent: 3533 / 1 Name: Mr a S Curtis Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

No, it is not the job of the residents of Keynsham to find a suitable site. It is down to the Council to find a more viable site that would suit the Gypsy, Traveller Community with the tax-payers money.

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No we do not agree with the Council's assessment and believe their plans to be flawed. This site has already been shortlisted. How did this happen when residents hadn't been kept abreast of the council's intentions? The council haven't used a common sense approach to the Traveller's plight and have not complied with Government planning policy guidelines.

We feel that BANES have not assessed the constraints of the site accurately. The council are also supposed to serve the local residents.

Firstly, as residents of Bath Road we were not notified of the Council's intention of placing the Gypsy Travellers site next to Ellsbridge House in 2010. Why?

There would be difficulty with vehicles accessing and exiting to and from the site due to their only being one entrance/exit to the A4. The major route to Bath and Bristol. This would cause chaos to a heavily trafficked road which already presents

problems.

The entrance is a short distance from the bypass at the Broadmead roundabout. Congestion!  
Furthermore there would be considerable cost to the taxpayer to have an additional entrance/exit to this site.  
There is also a question of the location of the Bus stop needing to be re-sited. Cost to whom?

There are additional environmental concerns about the woodland area (150 trees) and wildlife on this site which would have to be destroyed to accommodate numerous dwellings and vehicles. What about the cost and installation of services? Cost to the taxpayer?

Does the Council consider it correct to put a Traveller's site next door to a nursery? Vehicles coming and going throughout the day. The parents would need some form of guarantee that their children would be safe. Would Snapdragons Nursery be able to get sufficient insurance cover?

As Snapdragons nursery would be regulated by Ofsted and all staff would have to be CRB checked and children would have to be escorted to and from the premises. All visitors signed in.

With regard to local schools. Is there enough room for the Traveller's children at Wellsway and Saltford? There is often a problem to encompass local children in this regard.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No, for the above reasons.

Do you have any other general comments on the Preferred Options paper?

Respondent: 3546 / 1 Name: Ms Kathleen Matthews Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

My evidence on which to object to this proposal is based on local knowledge and the overriding adverse comments arising from the Detailed Site Assessments carried out by BaNES Council. There is to my mind nothing to justify further consideration of this site, and it clearly does not meet the necessary standards under the National guidance for such sites.

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No. The Council's own Site Assessment Table clearly indicates that this site is totally unsuitable for the proposed development. In addition, from consideration of the various reports and documentation, it appears clear that the process used by the Council to positively list this site for inclusion was deeply flawed.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No. There is nothing to justify taking this site forward, and the Council has yet to explain how, or why, it managed to move the site from 17th on its original list to a more favourable position, given that nothing has changed to remove any of the negative comments arising in the Council's own Detailed Assessment Table.

The site currently provides local residents with a visual barrier to the industrial estates.

There will be the loss of some 150 mature trees, with consequential adverse effect on local wildlife and amenity.

There are numerous safety concerns arising from the location of this site in close proximity to a major roundabout junction on the very busy A4 road.

The site is adjacent to a Grade II listed building, and any development will clearly affect the setting of this building.

The Grade II listed building is shortly due to open as a Day Care Nursery and there will be unacceptable danger and older people as a result of large towing vehicles and caravans manoeuvring in this area.

With this in mind, any proposal to develop a joint entrance with Ellsbridge House is totally unacceptable, not to mention extremely dangerous for any Ellsbridge House users.

Development of the site will require the relocation of a well used bus stop; the nearest suitable alternative location being almost half a mile along the busy A4.

Do you have any other general comments on the Preferred Options paper?

No. There is nothing to justify taking this site forward, and the Council has yet to explain how, or why, it managed to move the site from 17th on its original list to a more favourable position, given that nothing has changed to remove any of the negative comments arising in the Council's own Detailed Assessment Table. To reiterate not only the local objections, but also the Council's own negative assessment of the site:

The site currently provides local residents with a visual barrier to the industrial estates.

There will be the loss of some 150 mature trees, with consequential adverse effect on local wildlife and amenity.

There are numerous safety concerns arising from the location of this site in close proximity to a major roundabout junction on the very busy A4 road.

The site is adjacent to a Grade II listed building, and any development will clearly affect the setting of this building.

The Grade II listed building is shortly due to open as a Day Care Nursery and there will be unacceptable danger and older people as a result of large towing vehicles and caravans manoeuvring in this area.

With this in mind, any proposal to develop a joint entrance with Ellsbridge House is totally unacceptable, not to mention extremely dangerous for any Ellsbridge House users.

Development of the site will require the relocation of a well used bus stop; the nearest suitable alternative location being almost half a mile along the busy A4.

Respondent: 3549 / 1 Name: Mr Rod Podger Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

There appear to be sites already in use as unofficial traveller sites within BANES that might be more suitable than some or all of those shortlisted.

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

Agree with the drawbacks of the site – access issues, destruction of woodland, detraction of setting of existing listed building.

Why is access to local services and amenities access to the wider highway network apparently seen as a benefit? The purpose of the exercise is supposed to be to assess the suitability as a residential plot - not a bus terminal.

The process of site selection appears to be flawed as the inclusion of the site on the shortlist is contrary to preliminary considerations and potential alternatives.

The site is unsuitable due to the neighbouring business with restricted/shared access and the destruction of established woodland.

The site is on a very busy route joining Bristol and Bath which is already congested at peak times and adjacent to a busy roundabout.

The likelihood of planning permission being granted for residential development on such a site would be virtually zero if submitted by an individual or developer - so there is an apparent double standard in suggesting that the site be considered for such use by the council. The consultation FAQs indicate that six pitches is equivalent to 15 houses which would appear to be an overdevelopment of the space.

There appear to be alternative sites for which the existing school capacity (especially secondary) is greater.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No.

Do you have any other general comments on the Preferred Options paper?

In general with reference to all sites:-

The consultation papers state that "Councils are required by law to assess the accommodation needs of all people living in the area they are responsible for; this includes Gypsies and Travellers."

The requirement as stated is only to 'assess' not to provide but the council seem to infer that they must allocate/provide sites which is clearly not correct.

Respondent: 3556 / 1 Name: Mr David McClay Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

I feel the selection of this site is not in line with the Council's own site selection criteria outlined in Policy CP11 of their own core strategy. I make the following objections in line with each criteria:

b: satisfactory means of access can be provided and the existing highway network is adequate to service the site:  
The site is located just off the busy A4 and the entrance is located within a short distance of the nearby roundabout. The travelling community (understandably) have large 4x4 vehicles and frequently tow their vans and trailers with them. They will inevitably slow down to access the site and negotiate the entrance which has the potential to cause a build-up of traffic on the A4 that could feedback to the roundabout. It is also immensely difficult to cross the A4 if the travellers were coming out of the site to turn right. This may force them to pull into the road and wait for the opportunity to turn towards Keynsham. This would put themselves and fellow road users at risk.

d: the site does not harm the character and appearance of the surrounding area

The site contains a large number of trees (not shrubland) and provides an attractive entrance to the section of the A4 that leads towards Saltford. I do not see any environmental impact assessment in the site assessment report and would entirely object to the removal of the trees on this site. This would appear completely at odds with the Council's green agenda and preservation of green spaces.

g: the site should avoid areas at high risk of flooding and have no adverse impact on protected habitats and species, nationally recognised designations and natural resources

I also feel the removal of the trees could impact on the local ecology (insects, animals and birds) as well as the aesthetic factors.

f: use of the site must have no harmful impact on the amenities of neighbouring occupiers

I would include local schools within the category of local amenities. The local primary and secondary schools in the area are over-subscribed each year. I understand that selection criteria would mean that the people inhabiting the site are likely to be successful in securing school places but this would be at the expense of current local residents within the schools catchment. I object to the fact this site will have no harmful impact on the amenities of neighbouring occupiers as it could potentially mean my children will have greater competition for a place in their local school – which is a main factor when purchasing a house in this area.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

I do not agree with the site selection as the factors I have outlined above have not been adequately addressed in the assessment process undertaken thus far.

Do you have any other general comments on the Preferred Options paper?

Despite living within 2 miles of the proposed site I have not received any consultation paperwork or notification from BaNES county council. I have not noticed any advertisement for a consultation event or been made aware via direct mailings. This is particularly pertinent when considering the potential residents of the proposed site could be competing for school places with my own children. The 'consultation catchment' should therefore have been much wider than it has been. As a local resident I would challenge directly that an adequate consultation process have been developed and delivered.

Respondent: 3560 / 1 Name: Mr Richard Earle Organisation:

Schedule of comments: GT.14 Land near Ellsbridge House, Keynsham

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

This site appears to be in an area which the Environment flood maps show could in the future be flooded bearing in mind that there is a sewage farm downstream about half a mile.

So I would seriously consider that this site is totally inappropriate for residential use.

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

NO

Do you agree that the potential pitch provision be taken forward as a formal allocation?

NO

Do you have any other general comments on the Preferred Options paper?

This site has not been thought through as it's too close to the A4, a Nursery centre and industrial site. The costs and practicality involved to relocate the Bus stop and shelter are prohibitive. Also there is established natural barrier woodland which should be preserved for air quality in the area.

Respondent: 3567 / 1 Name: Mr+ Paul and Savage  
Wendy Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

I have lived in this location for more than ten years and therefore feel I am well qualified to comment in that I have first-hand experience of many factors affecting the proposed site.

I categorically believe that this site is wholly inappropriate as a site for Gypsies and Travellers and should be removed from the list of proposed sites as soon as possible, indeed I believe the entire process of site selection thus far is seriously flawed and should be reviewed and recommenced once all feedback from the current consultation is available.

My concerns regarding the Ellsbridge House site are as follows.

#### Environmental

The site is a densely wooded area containing a large number of mature trees which would need to be felled in order to create the space needed. As a person that spends a lot of time outdoors and appreciates the beauty of such environments, I find this completely unacceptable; surely there must be alternative sites where this scale of destruction would be unnecessary. I further understand that there has been no survey carried out in order to establish exactly what trees are located in the proposed area and what the environmental impact of the proposed destruction would be, clearly this pertains to the resident wildlife as well. Apart from being objects of great beauty the trees act as natural absorbers of traffic noise from the A4, without them I feel the acoustic balance in the area would be greatly impacted.

#### Site Access and Safety

I understand that the proposal is to either share the current Ellsbridge House access road or to create a new access point where the current bus stop is located. Regardless of which option is favoured, both present significant safety issues due to

the current volume of traffic and the location.

The location is a long-standing pinch point for traffic emerging at speed from the Keynsham bypass and Keynsham town itself, depending upon the time of day the traffic is either stationary because of sheer volume or travelling at significant speed as it emerges from the Broadmead Roundabout, every day I witness incidents of road rage and the prolonged use of horns as vehicles attempt to avoid the queues and push their way into the flow or simply compete for position.

Due to the volume of traffic in the area it is virtually impossible to exit the Ellsbridge House site by turning right onto the A4, there is hardly ever a time of day when there are gaps in both the westbound and eastbound carriageways to allow any vehicle to exit safely, the prospect of trying to do this with a large towing vehicle with caravan attached isn't worthy of consideration. I am reliably informed by a neighbour who has been resident opposite Ellsbridge House for several years that this issue was recognised some years ago by former owners of the site in that they installed a sign in the grounds of Ellsbridge House warning people exiting the site not to attempt a right turn, clearly the traffic levels then would have been far less than today.

Having already stated that a right turn is virtually impossible, all exiting vehicles would have to turn left towards Saltford and those intending to head towards Bristol would then look for the most convenient way of turning around. The very obvious but misguided choice would inevitably be the immediate right turn into the narrow road opposite Ellsbridge House (Bath Road and Ellsbridge Close). Due to the very narrow nature of that road there are already severe access problems with unavoidable delivery lorries, they usually end up unable to navigate the tight corners at either end, drive on the grass because the road is too narrow for the wheel base or get stuck at the opposite end because of commuter parking just off the Broadmead roundabout, indeed local residents often have to park with one wheel on the pavement so that anything larger than a car can pass unhindered.

#### Other issues

I have limited my comments to the ones that I believe directly affect residents living very near the proposed site however I am aware of numerous other issues associated with the proposed site not least those associated with it being located next to the Snapdragon children's nursery, I have read the points raised by Rosemary Collard and I fully appreciate her position and I fully support her stance on this issue.

I also believe that the planning expert associated with the local action group has raised a number of points regarding the process followed to date by BANES; again I fully support the stance taken by him and the action group.

As you can see from the points above I believe the proposed site is wholly inappropriate as a site for Travellers and Gypsies and I would like to see BANES delay the current process until all matters arising from concerned local residents and all other interested parties have been fully considered and appropriately addressed.

Respondent: 3567 / 1 Name: Mr+ Paul and Savage Organisation:  
Wendy

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Yes.

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No.

Do you have any other general comments on the Preferred Options paper?

1. Destruction of the woodland is bad because it would have a huge detrimental impact of the people, wildlife and the landscape of the lovely district of Keynsham and Saltford.
2. A4 Road is bad enough with traffic as it is, having traffic coming in and out of this location would cause an even bigger problem, not to mention very unsafe for pedestrians and children walking to and from school. THE SAFETY OF OUR CHILDREN COMES FIRST! Their safety would be compromised to an unacceptable level by the increase of large vehicles and daily traffic movement.

Respondent: 3568 / 1 Name: Ms Angela Payne Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

-The site next to Ellsbridge House is an area of densely populated woodland, with well established trees of well over fifty years old. I have lived opposite the proposed site all my life and it has always been a densely populated woodland. It would be criminal to fell these trees, when we are encouraging tree planting in other areas.

-The A4 is an extremely busy road and at times is tailbacked along the dual carriageway with standing/slow moving traffic for several hours. Additional traffic would be adding to the problem. I would assume we could be expecting at least twenty cars on the site, if not more and this is not included caravans.

-I understand that the entrance to the site will be by the bus stop. This is not an appropriate access, due to the amount of traffic on the A4 and also, from a safety point of view, the speed of cars accelerating away from the roundabout towards Saltford. Many years ago a sign directed visitors to Ellsbridge House to leave by turning left only, as turning right was too dangerous. The sign has long since gone and the quantity of traffic has now doubled or even trebled since then, therefore another access would not be recommended. There are already several accidents near this location per year due to the speed of vehicles at the roundabout. It will not just be cars accessing the site, but touring caravans, which take longer to manoeuvre, therefore adding to the existing traffic problem, which is already at saturation point.

-Where will the new bus stop be located?

-The site is bordering an industrial estate, with a large industrial building at the rear of the site, together with KFC and Domino Pizza. I do not think this is an acceptable location for a residential site.

-There is a long stretch of open stream along one end of the site. This is a stream which at times runs extremely fast and deep, and during extensive dry weather the water can become stagnant and foul smelling. Surely this would be a health and safety issue to all, especially children who will be playing in close proximity.

-The main A4 is extremely close to the proposed site and bearing in mind there will be children on the site, this is a very dangerous location for them.

-There are wildlife living in this area. I have regularly seen bats flying around at dusk, also owls. We should be protecting the wildlife, not destroying its natural habitat.

Respondent: 3569 / 1 Name: Mr+ D Hughes Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No – too superficial. Main issues are:

- 1) Unsafe access/exit onto/from a very busy road immediately after a large, busy roundabout
- 2) Further risk of accident from unsupervised animals & children close to busy road
- 3) Unacceptable destruction of mature woodlands & indigenous wildlife (animals & birds)
- 4) Adverse effect on Ellsbridge House that has been purchased for development of a children's nursery. Completely

Schedule of comments: GT.14 Land near Ellsbridge House, Keynsham

unacceptable & unfair to jeopardise a local business providing an essential service for Keynsham. There is also a risk of loss of jobs if the business was to fail.

5) Keynsham's infrastructure is already under pressure due to hundreds of 'new builds' & influx of council staff from Bath when the new council offices have been built. A gypsy/traveller site will increase this pressure further.

6) According to at least two reports from local press – residents, travellers & even Tim Ball (BANES LIB DEM COUNCILLOR in charge of planning) have stated that sites should be "away from properties" & not in residential areas. Ref: Bath Chronicle April 26th & Keynsham local paper 'Keynsham Voice'. A BANES resident with links to the travelling community said that the travellers "did not want to live where they are not welcome and would not choose residential areas"!! It would be a good time for the Lib Dem/Labour coalition group to start listening to the people who elected them to office and remove Ellsbridge House site from the list!

Do you agree that the potential pitch provision be taken forward as a formal allocation?

NO!

Do you have any other general comments on the Preferred Options paper?

Do you have any other general comments on the Preferred Options paper?

Please focus your comments on planning issues, national and local policies, government guidance and best practice for Gypsy and Traveller sites.

This whole process has been poorly communicated to the public & local councillors alike. To discover that this exercise has been going on for over two years but has been 'hidden' until approx 4 weeks before the 18th July deadline for comments is worrying to say the least. It's also of concern that the process is badly flawed. For Keynsham & Stanton Drew proposed sites to be shortlisted in the top 6 after the initial review of 23 sites placed them at 15th & 17th in the list! Something very wrong here!!

Respondent: 3570 / 1 Name: Mr Andy Beckett Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

There is an ongoing review into the consideration of opening a railway station at Saltford to reduce traffic congestion between Bath and Bristol at peak times, in particular at the end of the Keynsham by-pass towards Ellsbridge House, where queuing traffic can be seen for several hundred yards each morning. This would make access to the proposed site by travellers vehicles a Road Safety issue, particularly turning into the site from the direction of Bath and to carry on around the roundabout in the site would not be practical.

The councils traffic plan indicates a desire to improve congestion not to making it worse by increasing access around existing bottlenecks.

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

I agree with the majority of the assessment but the decision to shortlist the site appears to conflict with the findings on the assessment documentation.

There appears to be no consideration of: Fire Safety, Security, Health and safety, including Road Safety with the close proximity of a major highway; Industrial estate, Day Nursery and residential properties

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No, The councils decision to short this site conflicts with the evaluation- The site is adjacent to Ellsbridge House, a Grade II Listed Building due to reopen as a day care nursery in September 2012.

Development at this location would affect the setting of the Listed Building.

The site is located adjacent to the Ashmead Industrial Estate at Ashmead Road. Locations adjacent to industrial uses are not

encouraged for permanent sites due to health and safety issues associated with these.

The site location adjacent to the A4 Bath Road gives rise to noise issues. This would impact on the quality of life and health

of

site residents. The health and safety of site occupants, including children, is very important to site design and would require a detailed noise assessment prior to development.

Do you have any other general comments on the Preferred Options paper?

Respondent: 3571 / 1 Name: Ms Susan King Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

This site falls on the already overburdened main road joining Bristol & Bath. This road is extremely busy at all times of day. I live in Ellsbridge Close and travel to work in Bath on a daily basis. I am unable to cross the road from the junction onto this road at peak times due to the high volumes of traffic and am forced to use the road in front of my neighbours along the Bath Road to join the A4 at the Broadmead roundabout. I then navigate a complete circle around the roundabout to travel to Bath. In addition, I own a touring caravan myself and store it at the disused farmyard adjacent to this roundabout. Whenever, I use the caravan, I have to use extreme care and a great deal of patience to join the main road. Indeed, we time our journeys to and from our holidays to avoid having to navigate into the farmyard outside of the rush hour traffic. I cannot imagine how travelers could maneuver their larger caravans and trailers onto this road without caused either; causing a major accident or holding up traffic for vast periods of time.

In addition, the location of Wellsway school means there is a constant stream of pupils walking to and from schools along this main road. A major accident here would run a serious risk of injury to these pupils. I understand, this proposition would also mean the demolition of the bus stop at Ellsbridge House. Pupils to the school use this stop, has anybody in the council considered canvassing the views of the users of this stop?

Another consideration has to be the complete destruction of the 150 mature trees that currently grow on the proposed site. This woodland has provided shelter for many animals & insects and it is surely our job to protect the remaining woodland in this country. I, as a council tax payer, would be totally against this destruction.

I am appalled at the way my elected council is, what appears to be, totaling railroading this proposition forward without any consultation with the local residents. The first I heard about this, was at a meeting called by the Keynsham Action Group. I fully support all efforts to oppose this site.

Respondent: 3572 / 1 Name: Ms Joanna Postlethwaite Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

No

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No – I am extremely concerned as a local resident on the increase of traffic on what is already a vastly over used road. The

siting just by the school will make the extra traffic on the roundabout extremely hazard to all pupils. The noise levels in that area will be increased dramatically by the large increase in the population. I am unhappy about the implications of the changes that are going to be made in response to this siting will have a detrimental effect on the local community.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No

Do you have any other general comments on the Preferred Options paper?

No

Respondent: 3592 / 1 Name: Mr Vincenzo Costa Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

No

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No

Do you have any other general comments on the Preferred Options paper?

The site you are proposing at Ellsbridge house by Keynsham roundabout is not a suitable place for any type of travellers site, industrial site or any other site for that matter.

The reason for this is that:

1. You will add to the all ready busy A4 traffic, you will have people turning left to Bath and right to Bristol causing immense traffic and jams.
2. You propose to cut down almost 150 (approx.) trees of which I suspect are protected.
3. In cutting down the trees you will make the industrial states behind the trees visible to the public as they enter that section of the A4 and indeed the entry into Saltford Village - eventually into Bath itself, a good advert for Bath don't you think?
4. By cutting the trees down you will make the industrial units behind the trees visible to the residents directly opposite the trees.
5. It will be an eye sore for everybody that lives in that area, visits that area in Bath itself.
6. The noise level will increase for the residents directly in that area, as there will be more traffic, more movement of people - more noise generally.
7. You propose to put this particular site next to a nursery school, with shared access;
  - i) how do you propose to vet the people living or using the site next to the nursery as there are young children there?
  - ii) how do you propose to protect the children from molesters if there are any?
  - iii) how do you propose to control the rubbish amounts next to the school?
  - iv) how do you propose to control the noise level next to the school?

I think you have pitched a totally incorrect location for your idea and you need to access the situation again and look for a more suitable site, as I do not think this is suitable at all.

It is a total pleasure when you come to the end of the bypass, enter the roundabout, then start to come into Keynsham with all those lovely trees to view as you are drawing in, it would be a shame to cut them all down.

Also by cutting the trees this will have an effect to the environment as trees give out oxygen.

Respondent: 3595 / 1 Name: Mr+ Baicer Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

See any other comments

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No

Do you have any other general comments on the Preferred Options paper?

It is very evident that cutting down the woodland would be terrible. It would have a huge impact on the neighbourhood, wildlife, the trees provide a lovely visual impact to the area, including the grade 2 building, Ellsbridge house.

It would cause even more traffic problems to what is already awful. Having extra heavy vehicles to this busy road would cause horrendous problems including danger to people having to cross the main road, surely this would be an unsafe site for the travellers to live, right on an Industrial Site?!!

Respondent: 3596 / 1 Name: Mrs S Griffiths Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Yes the GT.14 Site

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No

Do you have any other general comments on the Preferred Options paper?

I consider this site unsuitable for gypsies/travellers to live on, as they would be sandwiched between the main A4 road and a large industrial estate, surely this is not safe and unhealthy. The main A4 would be brought to an unacceptable dangerous level due to an increase of large vehicles, entering access and exit. The destruction of many mature trees and woodland would destroy wildlife and the whole area including Grade 2 listed building Ellsbridge House.

Respondent: 3597 / 1 Name: Thelma Weaden Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

There are a considerable number of trees & wildlife on the land. This has not been assessed. Siting of a travellers site would mean removal of these – this would be detrimental to the area and against current govt. policy to conserve green areas.

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No

Do you have any other general comments on the Preferred Options paper?

I disagree with the proposal to site a Gypsy, Traveller and Travelling Showpeople site on the land adjacent to Ellsbridge House, Bath Road, Keynsham, for the following reasons:-

- This will be a Health and Safety issue for the gipsies, travellers on the site as it is sited on a busy main 'A' road between Bath and Bristol. This is an extremely busy road and it is very difficult to cross. There will be a lot of children on the site and they will be put in danger because of the busy road. It will not be appropriate to site a crossing as this will cause long traffic jams as the road is a main route for commuters etc.
- The plot also opens virtually on to a roundabout - this is an added danger as traffic comes from different directions and renders crossing the road even more dangerous
- The adjacent schools- Wellsway Secondary, Saltford primary and the nearest Keynsham primaries are all oversubscribed. More children from a travellers site will put undue pressure on these schools. These schools also do not have a lot of students leaving during their education and students often remain there throughout their school lives. This would not be the case with travellers children and in a school environment in the Keynsham area , they may feel 'different'. Children would be far happier and better placed in schools where there is more mobility eg: inner city schools.
- The access to the proposed travellers site would share an entrance with Ellsbridge House which is opening as a nursery in Sept 2012. This would cause additional traffic (by vehicles and people) and a greater Health and Safety hazard as a consequence. This would be dangerous to all parties but particularly to small children and mothers pushing buggies.
- The proposed land has a considerable number of trees growing on it and wildlife. These would be removed and against the government's policy of keeping green land.

Respondent: 3598 / 1 Name: Mr Antonio Losa Lara Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Yes - see comments below

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No

Do you have any other general comments on the Preferred Options paper?

1. Any increased access onto the already dangerous A4 Trunk Road will be detrimental to Highways Safety.
2. The woodland is a very important feature of this district in relation to landscape, animal habitat and absorbs A4 traffic pollutions.

If the woodland is destroyed the gypsies/travellers will be sandwiched between the heavily trafficked A4 Trunk Road and a big existing Industrial estate. If defeats the Health and Safety Regulations for Glops Sites.

Respondent: 3624 / 1 Name: Mrs S Watkins Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Ellsbridge House

If any councillor fails to see any problem with the above location, I suggest they should re examine their position on the Council. No-one could come up with a feasible reason why this location would warrant consideration.

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

How could any one, with any sense, put this location forward, when SO many issues are against it? So my answer is, NO

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Definitely NO

Do you have any other general comments on the Preferred Options paper?

Respondent: 3639 / 1 Name: Mrs Jane Chambers Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No

Do you have any other general comments on the Preferred Options paper?

1. Know knowledge of Gypsy site from BANES. We read it in local paper. Disgusting.
2. Access from road will be so dangerous, especially as it will shared by the Nursery.
- 3) Far too close to Nursery.
- 3) It will be a great shame to have to take all the 150 mature trees down, and the effect it will have on the wildlife.
- 5) It will be too close to co-op & food outlets.
- 6) Also to have to relocate bus stop which is used frequently by the locals and myself.
- 7) Will overload local schools that are already stretched.
- 8) Will be very dangerous with all their vehicles coming & going, using joint access with children so close.
- 9) There must be other sites that are far suitable than this. Considering that the Council first stated that this was not a suitable site with dangerous access. TOTALLY AGAINST THIS SITE GOING AHEAD

Respondent: 3640 / 1 Name: Mr K G Buck Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No

Do you have any other general comments on the Preferred Options paper?

1. Know knowledge of Gypsy site from BANES. We read it in local paper. Disgusting.
2. Access from road will be so dangerous, especially as it will shared by the Nursery.
- 3) Far too close to Nursery.
- 3) It will be a great shame to have to take all the 150 mature trees down, and the effect it will have on the wildlife.
- 5) It will be too close to co-op & food outlets.

- 6) Also to have to relocate bus stop which is used frequently by the locals and myself.
- 7) Will overload local schools that are already stretched.
- 8) Will be very dangerous with all their vehicles coming & going, using joint access with children so close.
- 9) There must be other sites that are far suitable than this. Considering that the Council first stated that this was not a suitable site with dangerous access. **TOTALLY AGAINST THIS SITE GOING AHEAD**

Respondent: 3670 / 1 Name: Ms Teresa Elsbury Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

I have received information that the site at Ellsbridge House, Bath Road is a proposed site for Gypsies and Travellers, yet as a resident I have not been informed of the consultation process, don't you think it's our right to know any local changes in land use, do we not have any say in the area in which we live?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No, I do not agree with the council assessment of the site. The proposed site is a completely unsuitable use of land. The proposed land is adjacent to a new nursery. The increase in traffic and sharing of driveway will make it unsafe for the young children. Access will be unsuitable with an increase in cars pulling out onto the main A4 Bath Road.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No, the pitch provision is totally unsuitable and it is a disgrace that the council are even contemplating cutting down over 150 mature trees, as a local resident - only yards from the proposed site, the trees absorb some of the traffic noise and are aesthetically pleasing to the eye. It is also unsuitable to remove the bus stop which is in constant use by local residents, workers and school children.

Do you have any other general comments on the Preferred Options paper?

I would like to oppose the council's proposals to turn land adjacent to Ellsbridge House into a travellers site. I have been a local resident for 15 years and I have not been contacted by the council with regard to the consultation process involving this planning issue. Why do the council think, as local residents, that we are not interested in the area we live in, why have we not had our views considered? The A4 Bath Road is a very busy road, any further increase in traffic is a recipe for disaster, especially as this could endanger the safety of the young children at the nursery. This site is totally unsuitable area for a travellers site.

Respondent: 3671 / 1 Name: Mr Dawn Taylor Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Yes - See any other comments

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No.

Do you have any other general comments on the Preferred Options paper?

The destruction of the woodland would have a detrimental impact on the people, wildlife and landscape of the whole area. As the site is sandwiched between the industrial estate and the A4, it would neither be safe nor healthy for the gypsy/travelling community.

Road safety would be compromised with the large towing vehicles and caravans gaining access on and off the site.

Respondent: 3683 / 1 Name: Mrs Diane Want Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

I wish to add my objections to the debate as to whether the above-mentioned site is suitable for its intended re-use.

Firstly, as I understand it, there will be a loss of around 150 mature trees. As the trees are near a very busy roundabout they obviously do much to improve the air quality of the area, and are also home to a variety of wildlife, which I believe we can ill-afford to lose.

As far as I am aware no consultation with the public was carried out, though I understand the council would dispute this, neither was a full traffic survey undertaken. Anyone who lives in the area is only too well aware of the problems traffic generates in this area, particularly at rush hour times. It is not unusual for traffic to back up along the by-pass at peak periods. If travelling show-people were to use the site, the length of their vehicles and trailers would make it a nightmare for other road users, were they to try to turn into the Ellsbridge House entrance. Even a car towing a caravan would have difficulty making the turn.

I fail to understand why, after having been rated as 15th in the council's 23 preferred sites we now find ourselves as one of the six preferred sites. Preferred by whom?

Finally, as Ellsbridge House is due to be opened as a children's nursery in the near future, and the lady owner had been hoping to acquire, and make use of, some of the woodland, for outdoor activities for the children in her charge, surely more thought should be given to this rather daft and very controversial proposal.

Respondent: 3688 / 1 Name: G Griffiths Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Ellsbridge House

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No

Access is unsuitable the A4 is a very busy congested road.

Sharing an entrance and access with a childrens nursery is unacceptable.

The prospect of mature trees and habitats being destroyed is deplorable.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No definitely not.

Do you have any other general comments on the Preferred Options paper?

The councils criteria put Ellsbridge House in 15th place as a possible site. Why did it suddenly become suitable as a site and jump to 6th place when the criteria hasn't changed.

Respondent: 3703 / 1 Name: Mr Barry Lloyd Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Keynsham

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No

For the following reasons:

- 1) The proposed site is an area of established mature woodland which should not be disturbed
- 2) Access will be from the very busy A4 linking Bath and Bristol. This stretch of road is already a 'pinch point' with traffic from Keynsham and from the Keynsham bypass dual carriageway funnelling into the single carriageway to Saltford as it heads south. Traffic is already frequently at a standstill here when there is any disruption to the flow through Saltford
- 3) The proposed site is immediately adjacent to, and shares an entrance with a new infants nursery for which BANES has only recently granted planning permission

Do you agree that the potential pitch provision be taken forward as a formal allocation?

NO

Do you have any other general comments on the Preferred Options paper?

As the council's review of the initial sites selected apparently deemed The Ellsbridge House site as 'unsuitable', and ranked 15th out of the 23 sites identified, it is difficult to understand how it is now being considered in the final selection process.

Respondent: 3729 / 1 Name: Mr John James Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Yes, I have information about the land near Ellsbridge House

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

Whilst the summary of opportunities and constraints is fair, the Recommendation flies in the face of the many constraints. The comments under the Highways section are revealing. It seems illogical to on the one hand suggest that the formation of additional access is "not in the interests of highway safety", yet a replacement access serving both sites suddenly becomes acceptable. All four paragraphs under the Site Constraints heading point to the location being completely unacceptable and are not in keeping with a number of paragraphs of Policy CP11 of the Draft Core Strategy. Under the Potential for Development and Suitability paragraph the second para completely rules out this site! Under the Availability and Achievability heading the only opportunity seems to be that the site is Council owned. The relocation of the bus stop is not acceptable, neither is it acceptable that any possible relocation has not been identified. The issue of cost has featured under several of the paragraphs but no attempt has been made to quantify the cost. The Recommendation is flawed.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No.

Do you have any other general comments on the Preferred Options paper?

The creation of this facility would completely destroy a swathe of woodland which contains Mature trees, including some fine Yews. In a recent report, the independent Panel on Forestry recommends that more trees should be planted – the development of this site would destroy trees and the wildlife which live beneath them.

This stretch of road is highly dangerous with irresponsible drivers approaching at speed from both directions. Have any Councillors tried crossing the road at this point – it is rather akin to the old computer game "Horace goes skiing".

A number of years ago a young Gypsy or Traveller girl was killed on the main A4 at Brislington (close to the junction at the old St Brendan's College). Please bear in mind the potential danger to young kids which would frequent this site if it were to go ahead.

Respondent: 3730 / 1 Name: Ms Jill King Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Yes - the land near EH

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No

Do you have any other general comments on the Preferred Options paper?

It would be a real shame to have to destroy so many trees/woodland. Also the proposed locations is on such a dangerous stretch of road, traffic builds very quickly and is very dangerous.

Respondent: 3734 / 1 Name: Ms Judith Harding Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

The road is fast moving ( coming off the roundabout) and this seems a totally dangerous area for anyone accessing the site.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No, definitely not. The site is totally unrealistic. If you drive past, the MOD building and land comes up to the back of the 150 trees ( being torn down for the development) so with that and KFC I cannot imagine where the entrance to the site would be.

Do you have any other general comments on the Preferred Options paper?

Respondent: 4001 / 1 Name: D Bayliss Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

No

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No

Do you have any other general comments on the Preferred Options paper?

Food outlets near opposite private houses near childrens nursery.

Respondent: 4039 / 1 Name: Ms Helen Godfrey Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Ellsbridge House not a suitable location as the adjoining property and by association the grounds are Listed and of historic value and must be preserved. BANES Conservation should conduct a full assessment of the impact of the proposal.

There are significant trees which must be preserved and is not "Redundant green space". There is significant wildlife which relies on such areas of green space and this needs to be full assessed.

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

The space is not "Redundant green space". Green space is important for wild life. The trees and shrubbery should be preserved.

Access to the site is restricted and proposes a significant safety risk to both residence of the site and the motorists and pedestrians using the A4.

Ellsbridge House, a Grade II Listed Building in use as a child day care nursery. The proposal would have a huge negative impact on this vitally important service and threatens the conservation of the listed building and its surroundings. The council has a responsibility to preserve the surroundings.

There is a significant health and safety risk to residence (including children) of the proposed site due to noise pollution and air pollution. I also agree a detailed noise assessment is required prior to development. This site is not considered suitable for development as a Gypsy or Traveller site due to its location adjacent to a busy and noisy highway. A full highways assessment is required.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

The site is NOT suitable for formal allocation for the reasons above. There are other suitable brownfield sites available.

Do you have any other general comments on the Preferred Options paper?

The small size of the site when compared to the large negative impact. The site is therefore not suitable.

Respondent: 4043 / 1 Name: Mr Jonathan Godfrey Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Ellsbridge House not a suitable location as the adjoining property and by association the grounds are Listed and of historic value and must be preserved. BANES Conservation should conduct a full assessment of the impact of the proposal.

There are significant trees which must be preserved and is not "Redundant green space". There is significant wildlife which relies on such areas of green space and this needs to be full assessed.

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

The space is not "Redundant green space". Green space is important for wild life. The trees and shrubbery should be preserved.

Access to the site is restricted and proposes a significant safety risk to both residence of the site and the motorists and pedestrians using the A4.

Ellsbridge House, a Grade II Listed Building in use as a child day care nursery. The proposal would have a huge negative impact on this vitally important service and threatens the conservation of the listed building and its surroundings. The council has a responsibility to preserve the surroundings.

There is a significant health and safety risk to residence (including children) of the proposed site due to noise pollution and air pollution. I also agree a detailed noise assessment is required prior to development. This site is not considered suitable for development as a Gypsy or Traveller site due to its location adjacent to a busy and noisy highway. A full highways assessment is required.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

The site is NOT suitable for formal allocation for the reasons above. There are other suitable brownfield sites available.

Do you have any other general comments on the Preferred Options paper?

The small size of the site when compared to the large negative impact. The site is therefore not suitable.

Respondent: 4099 / 1 Name: Ms Mary Llewellyn Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

I agree that the site is technically available because it is owned by the council, although it may be useful to reiterate that the owners of Snapdragons Nursery at Ellsbridge House have previously approached the council about the possibility of buying the land for use by the nursery for forest school.

I do not agree that the site is suitable, however. There are several requirements in the council's Policy CP11 of the Draft Core Strategy document which could not be met and some of these are acknowledged in the council's Detailed Site Assessment Report on the site:

6.2 b: satisfactory means of access can be provided and the existing highway network is adequate to service the site

There is currently no access to the site and the council's proposal to share the access belonging to Snapdragons Nursery is unsuitable. The nursery needs to be secure in order to safeguard children and with shared access the point at which the site is accessed would be impossible to secure. In addition the nursery drive is operated on a circular, one-way system which would require the residents of the adjacent site to exit through the nursery grounds, passing across the entrance to the nursery building. This would not be suitable for large towing vehicles and caravans.

The Detailed Site Assessment Report acknowledges that the access is far from satisfactory:

"The site fronts the heavily trafficked A4 in close proximity to the Broadmead roundabout junction. The formation of any additional access in this location would be resisted and not in the interests of highway safety, particularly given the need for access by large / towing vehicles and caravans. However, the existing access serving Ellsbridge House is substandard and a replacement access serving both sites may be considered, on balance, to be acceptable. This, though, may require the relocation of the existing well used bus stop layby, so an alternative location would need to be found in close proximity and resultant land ownership issues addressed. The formation of a new access and the relocation of the bus stop layby would have cost implications."

B&NES' Sustainability Appraisal Report 2012 requires that plans should "make sure that vehicles are able to access the public highway without causing traffic congestion or issues of safety" and I do not believe that these conditions can be met.

6.2 c: the site is large enough to allow for adequate space for on-site facilities and amenity, parking and manoeuvring, as well as any commercial activity if required

**Schedule of comments: GT.14 Land near Ellsbridge House, Keynsham**

Firstly, I would like to point out that the original site plan considered and displayed during the public consultation period was incorrect according to Land Registry documents and that the actual site is smaller by approximately 15-20%. This has an impact on the amount of plots being considered as well as the remaining space for on-site facilities, parking and manoeuvring.

Also, the Council's Assessment Matrix for the Ellsbridge House site (Ob6) states that waste collection vehicles would have difficulty accessing the site which implies that the caravans and trailers would also suffer from a lack of adequate space for manoeuvring.

Finally, a significant number of the existing trees would have to be left in situ to screen the residents from the impact of harmful noise and air pollution of the busy A4 and this would further diminish the size of the site.

In light of the error in the original site plan the following statement from the Detailed Site Assessment Tables would need to be adjusted to take account of the smaller area:

"Site Capacity The site consists of a flat area of land covered by dense vegetation. Based on 500m<sup>2</sup> pitch sizes (including for internal circulation, residents and visitor parking), the site of 0.3ha would have a holding capacity of 6 pitches, suitable for a permanent site. The site could alternatively accommodate transit pitches. Based on 200m<sup>2</sup> pitch sizes the site of 0.3ha would have a holding capacity of 15 pitches. Guidance recommends that this is the maximum site size for transit sites."

6.2 d: the site does not harm the character and appearance of the surrounding area

Development of this site would have a severe impact on the character and appearance of the surrounding area. It would involve the removal of over 100 mature trees which currently offer a visual amenity to the residents opposite the site by screening the view they would otherwise have of the industrial estate, particularly the recycling centre. This woodland forms the gateway to Keynsham/Salford and a green lung in an otherwise developed landscape helping to mitigate for the noise and air pollution produced by the A4 and the Industrial Estate.

The site would also have a negative impact on the adjacent Ellsbridge House which is a listed building.

The Detailed Site Assessment Report acknowledges this:

"Residential amenity and privacy at this location may be difficult to establish despite the existing screening at the roadside boundary. Site clearance to remove dense tree coverage would also be required prior to development. This would have cost implications. The site is adjacent to Ellsbridge House, a Grade II Listed Building due to reopen as a day care nursery in September 2012. Development at this location would affect the setting of the Listed Building."

Also, the Council's Assessment Matrix (Ob8) states:

"Development of this currently well screened green space would adversely impact on the townscape by the introduction of additional development to this location. The development of this site would have an adverse impact on this objective due to the development of a parcel of green space which partially screens the neighbouring developments. The development of this site would impact negatively on the setting of the neighbouring listed building."

6.2 e: adequate services including utilities, foul and surface water and waste disposal can be provided as well as any necessary pollution control measures

The Council's Assessment Matrix for the Ellsbridge House site (Ob6) states that "waste collection vehicles would have difficulty accessing the site".

6.2 f: use of the site must have no harmful impact on the amenities of neighbouring occupiers

The use of the site would have a harmful impact on the visual amenity of the residents opposite and on the listed building adjacent. Ellsbridge House is due to open as Snapdragons Nursery in September 2012 and will answer an identified need for additional childcare provision in the area, including funded places for eligible 2 year olds under the government's new scheme. The development of the site is already having a negative impact on registrations and the company's ability to attract some staff due to public concerns about the suitability of the council's plans.

6.2 g: the site should avoid areas at high risk of flooding and have no adverse impact on protected habitats and species, nationally recognised designations and natural resources

This site is adjacent to Flood Zone 2. The removal of 100+ trees and laying of roads/hard standing will increase the risk of flooding significantly. Also, the loss of mature specimen trees, habitat for wildlife and a green lung to reduce pollution for existing residents must be considered. Objective 9 in the Assessment Matrix says "habitat features have been identified on this site which would require protection"

I would also like you to consider the following letter:

Dear Sir,

Woodland in grounds of Ellsbridge house

Following on from your request for my opinion on the trees and any impact that development of the site may have upon them I provide my opinion below. I am a qualified Arborist holding industry recognised qualifications and have 25 years experience, 3 of which were as a Council Tree Officer. Likelihood of Development based on Council Policy: It is my professional opinion that due to the location, number of trees their age structure ,associated habitat and visual amenity that development would be unlikely.

The ecological and arboricultural reports, along with any working method statements and mitigation would be prohibitive, without considering the loss of trees . The loss of associated habitat on a scale such as this also being at odds with all Council Policy.

The Council have a policy and duty to preserve trees. They have powers to make tree preservation orders where a specimen warrants it, or where a tree may be under threat. They have duties to prevent breaches in wildlife legislation such as habitat regulations, badger act, countryside rights of way act (bats and birds)etc..

#### The Site:

The site is part of the garden of the listed grade 2 Ellsbridge house. There are many mature trees within the grounds (and specifically within the footprint you highlighted for development ,a large cedar 2 large pines a very large oak and numerous yews). There is also much regeneration – many ash, elm and some sycamore and this has developed into a woodland and is mainly untouched apart from some visible areas of clearance to keep fire escapes of adjacent buildings on a neighbouring industrial estate clear. This woodland is diverse in species and age structure and therefore has great potential to be habitat for many species of our native flora and fauna (wildlife).

Due to its location adjacent to an industrial estate and a main road (the A4 running between Bristol and Bath) it is a good wildlife corridor and screens the unsightly buildings behind. It has much visual amenity as a woodland and specific trees merit protection in their own right being more visible in the winter such as the yews, cedar and pine.

Whilst the island opposite is well treed the areas complement each other promoting a leafy feeling and enhancing the character of the area for the residents along the A4, particularly the residents in Ellsbridge Close and of course the parents and school children from the high achieving Wellsway Secondary School who will see the trees on several occasions throughout the day. This area also provides a welcome area of greenery for the many commuters travelling between Bristol and Bath soaking up noise and pollution.

Amenity and expediency are the important factors in deciding if a woodland or trees make the criteria for a Tree Preservation Order (TPO) and there are recognised tools for aiding assessment. Due to the threat of development I consider that it is expedient for a TPO to be applied and as mentioned above due to the high visibility and visual amenity of these trees from many perspectives and for many residents in and around the area as well as visitors to the South West it is entirely appropriate for this woodland to receive protected status.

#### Highway impact and Other points

The entrance /exit to the site is difficult with visibility being limited on exiting. This is unlikely to be satisfactorily resolved without alteration to the entrance and this would involve unacceptable loss of a mature yew and beech tree which reside either side of the entrance.

There are a few dead trees (presumably elm) but these are within the woodland and should be inspected/evaluated to ensure they do not pose a risk to footpath or road users.

A few wildlife trails were evident as was some earth disturbance with holes too big for rabbits but possibly suited to foxes or badgers.

Additional points:

Tree felling should take place outside of bird nesting seasons or following dawn and dusk surveys and sweeps for nesting birds. Particular attention should be made to ensure that bats are not using trees as roost sites. Conservation areas require prior notice of intention to fell. Tree preservation Orders require Councils consent before felling and usually involve consultation or planning permissions. Felling licences are required for felling of over 5 cubic meters in any

calendar quarter, although this site is exempt from this constraint as it lies within a garden with no firm boundary to prove otherwise.

Action:

You can contact the Council's Tree Officer Jane Brewer and request that she visits and applies a woodland Tree Preservation Order (TPO), within which the cedar, pines, yews, oak and beech mentioned above are specifically mentioned. This is the Tree Officers job as the site has been highlighted for development and the trees are therefore obviously at risk. The TPO could be applied without a visit if staff resources are an issue this as the trees are at risk and it is expedient to protect them, although the TPO applied would be an area order. The Council then has 6 months to confirm the TPO and could make any changes to make the TPO accurate at that point.

You could also ask the local Councillors and Parish Council of adjacent areas to request the same.

I hope this information is of use I ask that this opinion is not altered, forwarded or displayed without my consent.

Jon Bown

According to Appendix E: Detailed Site Assessment Tables:

#### Potential for Development and Suitability

The site is in an accessible location but is adjacent to existing industrial properties. This site is not considered suitable for development as a Gypsy or Traveller site due to its location adjacent to a busy and noisy highway.

#### Achievability

Site location adjacent to industrial properties and the A4 Bath Road is a significant barrier to the development of this site. Full highways and noise assessments and works to make the site suitable for caravan use would be required for development to take place in the medium-long term. There would also be costs associated with site clearance, the creation of an access and the relocation of the existing bus stop layby.

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

I agree with the following Site Constraints identified by the council's Site Assessment Document: "The site benefits from existing screening at its boundaries which also acts as a visual barrier to the industrial estate to the north of the A4 Bath Road at this location. Residential amenity and privacy at this location may be difficult to establish despite the existing screening at the roadside boundary. Site clearance to remove dense tree coverage would also be required prior to development. This would have cost implications. The site is adjacent to Ellsbridge House, a Grade II Listed Building due to reopen as a day care nursery in September 2012. Development at this location would affect the setting of the Listed Building. The site is located adjacent to the Ashmead Industrial Estate at Ashmead Road. Locations adjacent to industrial uses are not encouraged for permanent sites due to health and safety issues associated with these. The site location adjacent to the A4 Bath Road gives rise to noise issues. This would impact on the quality of life and health of site residents. The health and safety of site occupants, including children, is very important to site design and would require a detailed noise assessment prior to development".

I believe that the council is wrong in its assessment of the opportunity to form a new access or a shared access with the nursery because of the proximity to the Broadmead roundabout, the density of the traffic and the safeguarding issues of the nursery. No formal approach has yet been made to the nursery to discuss the options despite the obvious impact it would have on the viability of the plan.

The "existing screening" would have to be largely removed to make way for the site and/or a new access. You have not mentioned that removal of the trees, as well as being costly, will result in the loss of mature specimen trees, habitat for wildlife and a green lung. Objective 9 in the Assessment Matrix says "habitat features have been identified on this site which would require protection"

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No. In fact, I agree with the council's own Site Assessment that "This site is not considered suitable for development as a Gypsy or Traveller site due to its location adjacent to a busy and noisy highway" as well as all the additional reasons stated above.

Do you have any other general comments on the Preferred Options paper?

I have stated above all the planning issues, etc, that I feel, as a layman, are relevant. I would also like to add that I have been responsible for handling the registrations for Snapdragons Nursery at Keynsham and I have received approximately 20 phone calls from local people who have asked me for details and reassurances about the plans for the adjacent site. Their concerns are to do with the safeguarding of their children should the site proceed. I have been unable to offer any reassurances and these people have not registered their children. I am of course not able to tell you about the people who have not contacted us at all because of the proposals, but going by the numbers above, this may be a considerable amount of lost business.

Last week we held a recruitment day and 10 confirmed applicants did not attend. One later contacted us to say that she had reconsidered her application in light of the proposals. She did not feel able to give up a secure job for one that she felt may be in danger.

I have also received emails, including the one below:

FROM: [Name Withheld by Snapdragons]  
SUBJECT: RE: OPEN DAYS AT SNAPDRAGONS KEYNSHAM  
DATE: 25 June 2012 12:35:32 GMT+01:00  
TO: <keynsham@snapdragonsnursery.com [2]>

Good Afternoon,

I have been informed that the local council has put in an application for a Gypsy Site on land next to Ellsbridge Hse. Please can you tell me how this will impact on your nursery, how close will it be and what extra security/segregation arrangements will be in place.

I am not happy at the thought of this proposal and if it went ahead I would almost certainly not send my child to the Nursery.

Regards

[Name Withheld by Snapdragons]

Respondent: 4161 / 1 Name: Ms Vanessa Israel Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

No

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

I do not agree with the Council's assessment of this site.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No

Do you have any other general comments on the Preferred Options paper?

I feel that this site is totally inappropriate for a Gypsy and Traveller site for the reasons below.

1. There are approx 150 mature trees that would have to come down to make way for this site. These trees make up a visual barrier along the Bath road blocking off the industrial site behind. They make a very good visual site for people entering Keynsham which is important if Keynsham is in the process of being re-generated in the town centre. The trees are of value to our community and make a safe haven for all sorts of wildlife. It would have a huge detrimental effect on Bath road if they were to be pulled down.

2. The entrance to the site is also totally inappropriate for large vehicles that would be needed to tow travellers caravans/homes. I live on this stretch of road and in order to go to Bristol I have to take a detour down Pixash Lane and through the industrial estate as it is almost impossible to cross the road to turn right the majority of the day due to the volume of traffic.

The road is already extremely busy and to even consider adding to it with large vehicles is ridiculous. There was always a sign in Ellesbridge House to turn left on exiting due to the traffic problems. When it used to be used as a college the coaches could not get in and had to park in the bus stop down the road. How on earth would you get the weekly recycling/waste lorries in as well?

3. Another possibility we have been told is to move the bus stop further down the road and to make an entrance there. Do you realise that a large majority of senior citizens use the bus stop who live in the Unity/Gaston avenue roads of Keynsham. This would mean an extra long walk for them. Not only do senior citizens use the bus stop but also many school children from Wellsway School. How far do you propose them to go to get the bus home on a very busy road?

4. This stretch of road is already an extremely busy (one of the busiest in the South West) one and dangerous. One of my own children was knocked down walking to school, even using the bollard sight by Ellesbridge House to cross and with large vehicles this would make it even more hazardous for children crossing.

5. Ellesbridge House is indeed a Grade 2 listed building, what would happen to its status? We should be preserving sites and woods like this.

A childcare nursery is trying to establish itself in Ellesbridge House, this would bring employment to Keynsham, a much needed component in today's economic environment and yet this site proposes to destroy the business before it has even had the chance to build.

6. A neighbour of ours was refused planning for a dropped kerb, approx 80 yards from the entrance to Ellesbridge House. They were refused planning because it was felt too dangerous for a busy commuter route. And yet you propose to allow an entrance not far from the very busy Broadmead roundabout!

7. It has also been disclosed that the local schools are already heavily oversubscribed and so where would you hope to send the children to school? That would mean again more travelling on an extremely busy road at already worst traffic times to transport children to school.

Respondent: 4166 / 1 Name: Mr David Gillmorre Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

This site is adjacent to numerous and substantial industrial units, many of which can present a hazard in the machinery used and materials handled. It is also near Keynsham's recycling centre which may present a more significant hazard as potentially dangerous substances such as waste oil, neon tubes and asbestos are handled there. Keynsham's sewage works is also nearby.

The site currently contains a number of mature trees which would need to be cleared. In addition to the significant

Schedule of comments: GT.14 Land near Ellsbridge House, Keynsham

disruption caused to local residents and wildlife it will remove any potential screening of the site from neighbouring properties and adjacent roads. Even with the best intentions, these sites can be visually unappealing and will destroy the semi-rural feel this area has and impact on the quality of life of local residents.

This site is very near a fast, busy intersection of the Bath Rd and Keynsham bypass. Access to the site from the Bath Rd will need pay considerable attention to this to avoid significant traffic disruption and/or a serious road hazard. The cost of any safe modifications to the current road junctions should not be underestimated either.

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No. I think that the local impact on residents & roads, the hazards and costs associated with this site are more significant than reported in the assessment.

The addition of this site will change the local community in a significant and negative manner, affecting the quality of life for existing residents and those who might use such a site and I would like to formally object to the consideration of this site.

The sentiment of the local residents has been underestimated and has generated considerable bad feeling with almost unanimous objection from the people I've spoken to.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No.

This site is adjacent to numerous and substantial industrial units, many of which can present a hazard in the machinery used and materials handled. It is also near Keynsham's recycling centre which may present a more significant hazard as potentially dangerous substances such as waste oil, neon tubes and asbestos are handled there. Keynsham's sewage works is also nearby.

The site will harm the character and appearance of the surrounding area. The site currently contains a number of mature trees which would need to be cleared. In addition to the significant disruption caused to local residents and wildlife, some of which may well be protected species, it will remove any potential screening of the site from neighbouring properties and adjacent roads. Even with the best intentions, these sites can be visually unappealing and will destroy the semi-rural feel this area has and impact on the quality of life of local residents.

This site is very near a fast, busy intersection of the Bath Rd and Keynsham bypass. Access to the site from the Bath Rd will need pay considerable attention to this to avoid significant traffic disruption and/or a serious road hazard. The cost of any safe modifications to the current road junctions should not be underestimated either.

The addition of this site will change the local community in a significant and negative manner, affecting the quality of life for existing residents and those who might use such a site and I would like to formally object to the consideration of this site.

Do you have any other general comments on the Preferred Options paper?

I find it confusing why sites such as these are positioned where the impact to the local community would be so great.

The proposed site is against many of the local and government policies for the positioning of such sites; the impact to residents and potentially protected wildlife species, costs and disruption should have ruled this site out at a much earlier stage.

I would like to formally object to the consideration of this site.

Respondent: 4168 / 1 Name: Ms Caroline Baxter Organisation:

Schedule of comments: GT.14 Land near Ellsbridge House, Keynsham

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

I strongly disagree that as a tax payer we have to fund land for people who do not contribute to the community.

I have signed my daughter up to the nursery however if the traveller site is approved I will certainly be removing her as I feel this poses a huge risk.

Respondent: 4170 / 1 Name: Ms Jayne Court Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

I understand that the site close to the New Bridge Rd and Lower Bristol Rd junction, currently occupied by Travellers, is an unofficial site. I suggest this site be given official status. I my opinion this is a far more suitable location and does not add to the problems I have listed in section b below.

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No

Do you agree that the potential pitch provision be taken forward as a formal allocation?

I strongly disagree with the proposal to take the site adjacent to Elsbridge House forward as a formal allocation, based on the following;

1. The proposal would involve the felling of a considerable number of mature trees. I would be devastated by this action. I feel we should be protecting wooded areas not looking to clear them

2. There is a heavy flow of traffic along the Bath Road. I regularly use the local petrol station, situated a little further along this stretch of road. From experience I know that it can be extremely difficult to turn right when exiting these premises.

The prospect of long or wide vehicles trying to leave the proposed site has the potential to cause very serious safety hazard not to mention a catastrophic affect on traffic approaching Bath from Bristol.

3. Local amenities are already stretched. I typically wait a week to see a doctor when making an appointment. I feel this is already unacceptable and am seriously concerned by the impact of adding further patients.

Do you have any other general comments on the Preferred Options paper?

I understand that in initial assessments of suitability the Elsbridge House site was ranked approximately 15th in a list of 23. I am therefore baffled that it now appears to have been shortlisted with 5 other sites. I have so far been unable to find any explanation for this.

Respondent: 4171 / 1 Name: Mrs Gillian Baker Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

The Elsbridge House sight has been described as predominantly industrial and the fact that it is surrounded by residential properties appears to have been ignored. The houses opposite are situated within the greenbelt.

In my opinion the Ellsbridge House land is unsuitable for the following reasons:

1. This is a particularly busy section of the A4 very close to the Broadmead Roundabout. The addition of fast food outlets has already increased the traffic on the roundabout. There have been at least two accidents there in the last twelve months.
2. The access to the site is appalling and would necessitate large vehicles leaving and entering into heavy traffic. When the site was used by Radstock college coaches and other large vehicles regularly had difficulties and became wedged in the entrance. There used to be a no right turn out of the site because it is so difficult to make this manoeuvre without causing chaos to other road users.
3. It has been suggested the mature trees on the site would be destroyed to clear the area this would make the site noisy for the potential occupiers as the trees provide a sound barrier. We have been resident in this area for seventeen years and have seen a tremendous increase in the volume of traffic along this stretch of road. We have the advantage of a brick dwelling and double glazing yet road noise and pollution is evident. Our houses are further from the road than the proposed Gypsy site and the outdoor lifestyle of the proposed residents would make this an unhealthy environment for children and adults. Removing the trees would also create a change of street scene and present an eyesore for the residents immediately opposite the site.
4. The local Infant, Junior and Secondary Schools are oversubscribed yet places would have to be found for the children resident on the proposed site. School children will be at risk from yet another increase in traffic along their journey to work.
5. The land behind the proposed site backs onto a small industrial estate and the activities of these businesses (Often Nocturnal ) is hardly conducive to a peaceful and tranquil existence for the proposed inhabitants.

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

The site is close to local amenities but the access is not good. The statement that it is "ideally located for access to the highway network" can only have been made by someone who has never been to the site during the rush hour.

The fact that it would be adjacent to the Grade II listed Ellsbridge House is ridiculous. The Building is opening as a nursery and it would be impractical and dangerous to propose a shared access.

Removing the trees would be detrimental for the nursery as the benefits of sound and pollution barriers would be lost.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No I do not agree. Who would monitor the number of occupants on these pitches? On other sites numbers have often exceeded the official provision this would lead to overcrowding on a relatively small site.

The document seems particularly vague when describing exactly what constitutes a pitch.

It would mean relocating the X39 bus stop which will cause inconvenience for local residents and also has cost implications.

Do you have any other general comments on the Preferred Options paper?

The Twerton site seems a much more suitable site in terms of access and size. There are schools in Bath which are undersubscribed and in danger of closing who would surely welcome an increase in their population.

Respondent: 4188 / 1 Name: D Parsons Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

GT.6 seems suitable for a yard for Travelling Showpeople

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No, this is an unsuitable site. It is too proximate to the children's nursery at Ellsbridge House.

Environmentally – it would be wrong to destroy a grove of over 100 mature trees that screens the industrial estate from the nearby residential area.

Highways and traffic – the site is much too close to the busy Broadmead roundabout junction of the A4. It is a dangerous location. In addition, Travellers will bring their horses. In the absence of suitable grazing land on or adjacent to the site it is foreseeable that horses will be put out to graze on the grass verge of the A4 which will be hazardous to road users as well as the horses themselves.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No.

Do you have any other general comments on the Preferred Options paper?

Respondent: 4189 / 1 Name: Ms Andrea Redman - Jones Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No, I do not agree with the Council's assessment of opportunities and constraints on this site for the following reasons:

The site is wholly unsuitable in land use terms due to the fact that it is located next to a childrens nursery where there is no physical barrier between the proposed site and the current nursery use. Safeguarding of children is paramount and the increase in traffic to and from the proposed site from a busy A road together with no physical boundary between the different land uses would be detrimental in achieving this objective.

As outlined above, the site would be accessed from the busy main A4 Bath Road and the access point is unsuitable for vehicles entering and leaving the site without causing a high level of risk to health and safety for highway users. Evidence shows that there are already many accidents that occur at this pinch point and to add any further vehicular traffic exiting and entering this location would further add to this problem and compromise highway safety.

The bus stop that serves Wellsway school and a number of residential properties would have to be moved from its current location and there is no suitable alternative location within the vicinity. This would have a detrimental effect on public transport accessibility for residents and students attending Wellsway school.

The site is located next to a Grade II listed building. The proposed land use is totally inappropriate to the setting of the Grade II listed building and would adversely affect the character and appearance of this historic and architecturally interesting landmark.

A great deal of work is currently being undertaken to bring the internal fabric of the building back to its former glory and to preserve and enhance the character and appearance of this listed building. It is therefore wholly inappropriate for the land use surrounding this building to compromise this.

The proposed use of this site would mean that 150 trees would need to be felled to create the pitch provision and this would be extremely detrimental to the setting of the Grade II listed building as well as the loss of wildlife habitat in this vicinity. The trees also provide a 'green lung' to the location and this also provides benefits in terms of natural screening, noise absorption and visual amenity to the residential properties that face directly onto the site.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No I do not agree that the potential pitch provision should be taken forward as a formal allocation for the reasons outlined above.

Do you have any other general comments on the Preferred Options paper?

I am concerned that the process by which GT14 has appeared in the top six sites would appear to be flawed. The methodology does not appear to have been applied consistently. For example, reasons for rejecting certain sites have been ignored in this situation when the same criteria applies in proposing to take this site forward.

Unfortunately, this gives the impression that sites have already been pre-decided for reasons of ease of site disposal rather than being robustly applied in planning terms.

Respondent: 4191 / 1 Name: Mr JW Bridgeman Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

No.

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No.

There is a serious road safety issue associated with the site and its implications with the already busy A4. This has been confirmed informally by the Highways Authority particularly in relation to large towing vehicles.

Alongside this, the Council also acknowledge that this site does not meet the Health & Safety criteria laid down for Gypsy/Traveller sites. This is primarily focused on its location next to Industrial Estates but the safety for any children living on a site sandwiched between a busy A4 and an industrial estate has to be equally as important.

There is a Safety Critical issue with adding any additional access on/off the roundabout, as was suggested as an alternative to the existing access to Ellsbridge House which is privately owned by the new owners, Ellsbridge House Child Day Care Nursery.

A previous application in 1980 for storage of caravans on the same site was rejected by the then County & Highways Committee. The planning proposal was withdrawn. Obviously since then, the traffic load on the A4 has increased substantially.

Since Highways Department have not given ANY approval to additional site access to the site, how can such a site be seen as appropriate?

There is an environmental issue regarding the freshwater stream at the narrow end of the site that feeds in to the River Avon. A developed site will not give the surface water protection currently provided by dense woodland.

Removing such a large collection of trees of this sort present a massive environmental impact and is against the Core Strategy for the area. This is at odds with the Council's green agenda and the preservation of green spaces.

Protected species have been spotted in the area and any development of that site would have to heavily adhere to the protected species legislation. That's not to say that the Council would act above that legislation but it has not been clear that any enquiries of this nature have been taken in the published documents in this pre-consultation.

There is no evidence that the MoD (neighbouring the site) have been consulted.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No.

For the reasons details above.

Primarily:

- Residents' safety
- Highways/Road user safety
- Gypsy/Traveller safety
- Substantial environmental impact
- Potential threat to protected species

-Positioning so close to an industrial estate

Do you have any other general comments on the Preferred Options paper?

The proposal election of this site is not in line with the Council's own site selection criteria outlined in Policy CP11 of the Core Strategy. Specifically...

The travelling community (understandably) have large 4x4 vehicles and frequently tow their vans and trailers with them. They will inevitably slow down to access the site and negotiate the entrance that has the potential to cause a build-up of traffic on the A4 that could feedback to the roundabout. It is also immensely difficult to cross the A4 if the travellers were coming out of the site to turn right. This would put themselves and fellow road users at risk.

The site contains a large number of trees. There has not yet been any environmental impact assessment in the site assessment report and such a report, I've no doubt, would object to the removal of the trees on this site. This is against the Council's green agenda and preservation of green spaces.

There is an environmental issue regarding the freshwater stream at the narrow end of the site that feeds into the River Avon. A developed site will not give the surface water protection currently provided by dense woodland.

The removal of the trees could impact on the local ecology (insects, animals and birds) as well as pure aesthetic factors which also should not be ignored.

I feel that a full environmental report should have been carried out before this site was selected and feel that any further pursuit of this proposed area will further inconvenience residents, Council officials and add great cost to a proposal that is wholly inappropriate for the site selected.

Respondent: 4193 / 1 Name: Mr Andrew Caddick Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No

Do you have any other general comments on the Preferred Options paper?

The Proposed site at Ellsbridge House comprises of approx 0.3 hectare of densely populated, mature woodland, which presumably would be destroyed in order to provide the site. The site is sandwiched between the very busy A4 trunk road to the front of the site, an existing Industrial Estate to the rear, a public footpath and stream on one side, and Ellsbridge House, (a Grade II listed property) to the other. Opposite the proposed site, along the A4 Bath Rd, are long established residential properties which directly face this site. The existing woodland is a vital visual amenity as it protects these properties from the visual and noise impact from the Ashmead Rd Industrial Estate.

#### HIGHWAYS- GT.14 Land near Ellsbridge House

Traffic considerations- this section of the A4 is a pinch-point, caused by the convergence of traffic from Keynsham and the Keynsham by-pass. Stationary/queuing traffic can be found regularly at various times of day, and this is often combined with traffic having come down the dual carriageway at speeds of up to 70mph, still adjusting to the loss of a lane, just as they leave the roundabout, right at the point they pass the proposed site. Additional traffic (particularly long vehicles), entering and leaving this site could potentially be very dangerous for all road users concerned. There was also a suggestion that the existing bus stop could be moved in order to create an entrance/exit for this site, but this would beg the question as to where the bus stop would be moved to, as there would not appear to be any obvious areas close by which would replace this well used bus stop. Additionally, moving the entrance/exit to the site even closer to the Broad mead

**Schedule of comments: GT.14 Land near Ellsbridge House, Keynsham**

roundabout would only contribute to making this an extremely dangerous junction. It would appear that in 1980 a planning proposal WK113/D was made by Wansdyke Council to store caravans on this same site. This proposal was rejected on the grounds that access to the site was too dangerous. I would suggest that the volume of traffic using the A4 has increased dramatically in the last 30 years, so cannot see how it can be argued that it is now in order to grant planning.

**SITE CONSTRAINTS- GT.14 Land near Ellsbridge House**

With regards to the reference in the Preferred Options document that the site benefits from existing screening at its boundaries is an understatement. The visual amenity provided by this woodland is due to the proximity and density of the woodland, and not merely trees on the boundary. Loss of this woodland would expose the Industrial estate behind this site, including associated noise pollution. I also believe there is a bat colony residing in this woodland, as we have many bats flying around in the evenings, and there does not appear to have been any research undertaken with regards to any potentially protected species that could be affected. Ellsbridge House is, as the report states, a grade II listed property, and this development would have a detrimental impact on the setting of this listed property.

The rear of the property is adjacent to Ash mead Industrial Estate, and I believe immediate neighbours are a waste recycling centre and an MoD establishment. As the report states, from a Health & Safety aspect, this is hardly ideal for residents (including small children), to live in such close proximity. I do not believe this would be a pleasant place to live with the industrial estate on one side, and a very busy trunk road on the other, and could potentially be extremely dangerous location for children and animals.

**POTENTIAL FOR DEVELOPMENT AND SUITABILITY OF SITE ISSUES- GT.14 Land near Ellsbridge****House**

The site is clearly not suitable for developments as a Gypsy or Traveller site, as set out in the Preferred Options report. It is impossible to gain safe access to this site, and any suggested 'improvements' are flawed. In addition the obvious Health & Safety issues are insurmountable considering the permanent fixtures that are the industrial estate and the A4. Most significantly, it would quite simply be a most unpleasant environment in which to live.

**AVAILABILITY AND ACHIEVABILITY ISSUES- GT.14 land near Ellsbridge House** The Banes assessment that there are 'significant barriers to this development', are undeniable. The barriers are so significant and permanent (industrial estate/A4), that it is difficult to understand why this site has reached the top 6?

**SITE CAPACITY- GT.14 land near Ellsbridge House**

Please note, this is NOT a site which consists merely of 'dense vegetation', but is a dense woodland of mainly large deciduous trees, the loss of which will have a devastating effect on the settled community.

**SITE SCORING MATRIX- GT.14 land near Ellsbridge House** The scoring matrix undertaken by BANES makes difficult to believe reading. The scores given for the following should all attract negative scores: Site Screening, Landscape Designation, European Protected Species, Hazardous Place, Safe Access to Highway If the scores allocated to the above were correctly rated, the site overall score would be very different to that awarded by BANES.

**RECOMENDATION - GT.14 land near Ellsbridge House** The site has a number of VERY serious issues which I believe are not recoverable. Health & Safety for the site occupants presumably has to be the priority, and as has been previously discussed, issues such as the presence of an Industrial Estate, and a very busy trunk road, both being immediately adjacent to this proposed site, quite simply cannot be 'mitigated', and I do not see how these issues could possibly be overcome.

Respondent: 4194 / 1 Name: Pat Lidgey Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

I am utterly opposed at opening up the Ellsbridge House site to a Travellers camp and felling all those beautiful trees - it will decimate the landscape.

I have lived in Saltford for 22 years and had many happy hours at various classes at the Educational Centre in Ellsbridge House and never understood why these closed down.

Respondent: 4198 / 1 Name: Mrs Glanville Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?

I can see no reason why, developing the Ellsbridge House area for travellers would create a problem, providing it's a controlled site, no waste or rubbish hanging around, and proper sanitation installed,

I live in Keynsham, but it wouldn't be a problem at all, people are frightened of the unknown, I'm sure it would all settle down after a while, small mindedness and discrimination of anyone or anything is despicable, zero tolerance should be applied.

Respondent: 4201 / 1 Name: Mr Andrew Jones Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

No

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

No

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No

Do you have any other general comments on the Preferred Options paper?

I consider that this site is unsuitable for its proposed use mainly because of the traffic congestion and safety risk that will be created by having the entrance/exit to the site opening onto the main A4 in close proximity to the Ashmead Road roundabout. The A4 is already at its capacity for traffic for the majority of the day and to potentially introduce large vehicles and trailers, together with the traffic from Ellsbridge House, would in my opinion, cause a safety hazard to not only the people using the entrances to the site and Ellsbridge House, but also the traffic on the A4. I have not seen any detailed analysis of traffic management in and out of the site, any detail on the proposed layout of the entrance and where it will be in relation to the entrance to Ellsbridge House and the bus stop. I would have thought that it would be critical to the evaluation of this site that the Council's Highways Engineers produce a detailed report showing exactly how the site entrance would work taking into account all of the local influencing factors.

My other concern with this site is the loss of the trees. The trees form an important visual backdrop along the A4 from the Ashmead Road roundabout to the Pixash Lane turning and the loss of this feature would be a great visual detriment.

Respondent: 4206 / 1 Name: Mr Paul Collard Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

1. The size of the site is inaccurate according to Land Registry documentation by at least 20%.
2. The site does not have its own access from the busy A4 Bath Road. The access serving Ellsbridge House, now registered as Snapdragons Day Nursery and Out of School Club is totally unsuitable for shared use, particularly in view of the fact that it operates a one-way system following the line of the natural driveway.
3. The site is covered by dense woodland amounting to more than 100 trees. The trees form a screen that acts as a visual barrier to the industrial estates behind.

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

I do agree that the site is available and owned by the council. I knew this fact and enquired about purchasing the site. As part of our nursery care and education, we run forest school activities. I felt this site would offer excellent opportunities for forest school. If we were able to purchase this site, we could maintain and care for the woodland and offer the area to the wider community so that local children could come and play and benefit from this local amenity. In fact the government's revised Early years Foundation Stage curriculum states that children must spend part of their day outside and there is no better way than in a natural woodland where play can be free and unstructured. If the site were to be made available for purchase, we would do so and use it for the benefit of all families, both at nursery and in the wider environment.

I do not agree that it provides an opportunity to be developed as a gypsy and traveller site or indeed any residential site because of the difficulties of access, the busy A4 and the location of the industrial estate, all of which make it highly unsuitable for residential development for families with young children. In addition, once the trees are removed to make way for development, much of the screening provided by the trees will disappear and this will increase the amount of noise and pollution which again makes for a totally unsuitable environment for families.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

I am the owner of Snapdragons Nurseries Ltd and a director. I am extremely concerned about the proposals and the impact they will have on this nursery and the other nurseries in the group, which may be affected. We are planning to create 40 local jobs at all skill levels as well as additional childcare provision in the area and these proposals are already having a significant impact on our ability to do so.

I do not agree that the potential pitch provision be taken forward because there are too many reasons why the site is undeliverable and these have been highlighted by the council and by myself.

The recommendation by the council was "the site is inappropriate for development due to the location adjacent to the industrial estate and the A4 Bath Road. Significant measures to protect resident amenity and privacy, safe highway access and health would be required at this location. It is considered unsuitable for development as either a Gypsy, Traveller or Travelling Showpeople site due to these constraints. The site should not be allocated for development".

In addition the ownership of Ellsbridge House has changed and is now Snapdragons Day Nursery which means the access is being used daily and this access needs to be secure in order to ensure we are safeguarding the children to the best of our ability. Shared access is always difficult to manage and I need to ensure that I manage this to the best of my ability otherwise I will not fulfill the statutory welfare requirements laid down by Ofsted.

Do you have any other general comments on the Preferred Options paper?

I have submitted several statements to the council about my concerns as to the suitability and deliverability of this site.

have found the whole process very time consuming and worrying, at a time when I have been trying to promote the nursery and recruit new members of staff.

I completely believe that families have a right to choose where they want to live and should not be discriminated against because of the choices they make. Running a children's nursery means that our environment must be inclusive and diverse and I firmly believe that it is not right to place families in areas that have already been deemed unsuitable for development for perfectly sound and valid reasons. I work with families every day and know that it is the home environment that has the most profound impact on a child's health and well-being. Being wedged between an industrial estate and the busy A4 presents as a significant barrier to achieving a healthy lifestyle and should not be allowed.

Respondent: 4207 / 1 Name: Mr James Collard Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

I am a director of Snapdragons Nurseries Ltd and will be in direct charge of the new nursery adjacent to this proposed site. I would like the following to be taken into consideration.

I agree that the site is technically available because it is owned by the council, although it may be useful to reiterate that the owners of Snapdragons Nursery at Ellsbridge House have previously approached the council about the possibility of buying the land for use by the nursery for forest school.

I do not agree that the site is suitable, however. There are several requirements in the council's Policy CP11 of the Draft Core Strategy document which could not be met and some of these are acknowledged in the council's Detailed Site Assessment Report on the site:

6.2 b: satisfactory means of access can be provided and the existing highway network is adequate to service the site

There is currently no access to the site and the council's proposal to share the access belonging to Snapdragons Nursery is unsatisfactory. The nursery needs to be secure in order to safeguard children and with shared access the point at which the site is accessed would be impossible to secure. In addition the nursery drive is operated on a circular, one-way system which would require the residents of the adjacent site to exit through the nursery grounds, passing across the entrance to the nursery building. This would not be suitable for large towing vehicles and caravans.

The Detailed Site Assessment Report acknowledges that the access is far from satisfactory:

"The site fronts the heavily trafficked A4 in close proximity to the Broadmead roundabout junction. The formation of any additional access in this location would be resisted and not in the interests of highway safety, particularly given the need for access by large / towing vehicles and caravans. However, the existing access serving Ellsbridge House is substandard and a replacement access serving both sites may be considered, on balance, to be acceptable. This, though, may require the relocation of the existing well used bus stop layby, so an alternative location would need to be found in close proximity and resultant land ownership issues addressed. The formation of a new access and the relocation of the bus stop layby would have cost implications."

B&NES' Sustainability Appraisal Report 2012 requires that plans should "make sure that vehicles are able to access the public highway without causing traffic congestion or issues of safety" and I do not believe that these conditions can be met.

6.2 c: the site is large enough to allow for adequate space for on-site facilities and amenity, parking and manoeuvring, as well as any commercial activity if required

Firstly, I would like to point out that the original site plan considered and displayed during the public consultation period was incorrect according to Land Registry documents and that the actual site is smaller by approximately 15-20%. This has an impact on the amount of plots being considered as well as the remaining space for on-site facilities, parking and manoeuvring.

Also, the Council's Assessment Matrix for the Ellsbridge House site (Ob6) states that waste collection vehicles would have

difficulty accessing the site which implies that the caravans and trailers would also suffer from a lack of adequate space for manoeuvring.

Finally, a significant number of the existing trees would have to be left in situ to screen the residents from the impact of harmful noise and air pollution of the busy A4 and this would further diminish the size of the site.

In light of the error in the original site plan the following statement from the Detailed Site Assessment Tables would need to be adjusted to take account of the smaller area:

“Site Capacity The site consists of a flat area of land covered by dense vegetation. Based on 500m<sup>2</sup> pitch sizes (including for internal circulation, residents and visitor parking), the site of 0.3ha would have a holding capacity of 6 pitches, suitable for a permanent site. The site could alternatively accommodate transit pitches. Based on 200m<sup>2</sup> pitch sizes the site of 0.3ha would have a holding capacity of 15 pitches. Guidance recommends that this is the maximum site size for transit sites.”

#### 6.2 d: the site does not harm the character and appearance of the surrounding area

Development of this site would have a severe impact on the character and appearance of the surrounding area. It would involve the removal of over 100 mature trees which currently offer a visual amenity to the residents opposite the site by screening the view they would otherwise have of the industrial estate, particularly the recycling centre. This woodland forms the gateway to Keynsham/Salford and a green lung in an otherwise developed landscape helping to mitigate for the noise and air pollution produced by the A4 and the Industrial Estate.

The site would also have a negative impact on the adjacent Ellsbridge House which is a listed building.

The Detailed Site Assessment Report acknowledges this:

“Residential amenity and privacy at this location may be difficult to establish despite the existing screening at the roadside boundary. Site clearance to remove dense tree coverage would also be required prior to development. This would have cost implications. The site is adjacent to Ellsbridge House, a Grade II Listed Building due to reopen as a day care nursery in September 2012. Development at this location would affect the setting of the Listed Building.”

Also, the Council's Assessment Matrix (Ob8) states:

“Development of this currently well screened green space would adversely impact on the townscape by the introduction of additional development to this location. The development of this site would have an adverse impact on this objective due to the development of a parcel of green space which partially screens the neighbouring developments. The development of this site would impact negatively on the setting of the neighbouring listed building.”

6.2 e: adequate services including utilities, foul and surface water and waste disposal can be provided as well as any necessary pollution control measures

The Council's Assessment Matrix for the Ellsbridge House site (Ob6) states that “waste collection vehicles would have difficulty accessing the site”.

6.2 f: use of the site must have no harmful impact on the amenities of neighbouring occupiers

The use of the site would have a harmful impact on the visual amenity of the residents opposite and on the listed building adjacent. Ellsbridge House is due to open as Snapdragons Nursery in September 2012 and will answer an identified need for additional childcare provision in the area, including funded places for eligible 2 year olds under the government's new scheme. The development of the site is already having a negative impact on registrations and the company's ability to attract some staff due to public concerns about the suitability of the council's plans.

6.2 g: the site should avoid areas at high risk of flooding and have no adverse impact on protected habitats and species, nationally recognised designations and natural resources

This site is adjacent to Flood Zone 2. The removal of 100+ trees and laying of roads/hard standing will increase the risk of flooding significantly. Also, the loss of mature specimen trees, habitat for wildlife and a green lung to reduce pollution for existing residents must be considered. Objective 9 in the Assessment Matrix says “habitat features have been identified on this site which would require protection”

I would also like you to consider the following letter:

Dear Sir,

### Woodland in grounds of Ellsbridge house

Following on from your request for my opinion on the trees and any impact that development of the site may have upon them I provide my opinion below.

I am a qualified Arborist holding industry recognised qualifications and have 25 years experience, 3 of which were as a Council Tree Officer.

#### Likelihood of Development based on Council Policy:

It is my professional opinion that due to the location, number of trees their age structure ,associated habitat and visual amenity that development would be unlikely.

The ecological and arboricultural reports, along with any working method statements and mitigation would be prohibitive, without considering the loss of trees . The loss of associated habitat on a scale such as this also being at odds with all Council Policy.

The Council have a policy and duty to preserve trees. They have powers to make tree preservation orders where a specimen warrants it, or where a tree may be under threat. They have duties to prevent breaches in wildlife legislation such as habitat regulations, badger act, countryside rights of way act (bats and birds)etc..

#### The Site:

The site is part of the garden of the listed grade 2 Ellsbridge house. There are many mature trees within the grounds (and specifically within the footprint you highlighted for development ,a large cedar 2 large pines a very large oak and numerous yews). There is also much regeneration – many ash, elm and some sycamore and this has developed into a woodland and is mainly untouched apart from some visible areas of clearance to keep fire escapes of adjacent buildings on a neighbouring industrial estate clear. This woodland is diverse in species and age structure and therefore has great potential to be habitat for many species of our native flora and fauna (wildlife).

Due to its location adjacent to an industrial estate and a main road (the A4 running between Bristol and Bath) it is a good wildlife corridor and screens the unsightly buildings behind. It has much visual amenity as a woodland and specific trees merit protection in their own right being more visible in the winter such as the yews, cedar and pine.

Whilst the island opposite is well treed the areas complement each other promoting a leafy feeling and enhancing the character of the area for the residents along the A4, particularly the residents in Ellsbridge Close and of course the parents and school children from the high achieving Wellsway Secondary School who will see the trees on several occasions throughout the day. This area also provides a welcome area of greenery for the many commuters travelling between Bristol and Bath soaking up noise and pollution.

Amenity and expediency are the important factors in deciding if a woodland or trees make the criteria for a Tree Preservation Order (TPO) and there are recognised tools for aiding assessment. Due to the threat of development I consider that it is expedient for a TPO to be applied and as mentioned above due to the high visibility and visual amenity of these trees from many perspectives and for many residents in and around the area as well as visitors to the South West it is entirely appropriate for this woodland to receive protected status.

#### Highway impact and Other points

The entrance /exit to the site is difficult with visibility being limited on exiting. This is unlikely to be satisfactorily resolved without alteration to the entrance and this would involve unacceptable loss of a mature yew and beech tree which reside either side of the entrance.

Schedule of comments: GT.14 Land near Ellsbridge House, Keynsham

There are a few dead trees (presumably elm) but these are within the woodland and should be inspected/evaluated to ensure they do not pose a risk to footpath or road users.

A few wildlife trails were evident as was some earth disturbance with holes too big for rabbits but possibly suited to foxes or badgers.

Additional points:

Tree felling should take place outside of bird nesting seasons or following dawn and dusk surveys and sweeps for nesting birds. Particular attention should be made to ensure that bats are not using trees as roost sites. Conservation areas require prior notice of intention to fell. Tree preservation Orders require Councils consent before felling and usually involve consultation or planning permissions. Felling licences are required for felling of over 5 cubic meters in any calendar quarter, although this site is exempt from this constraint as it lies within a garden with no firm boundary to prove otherwise.

Action:

You can contact the Council's Tree Officer Jane Brewer and request that she visits and applies a woodland Tree Preservation Order (TPO), within which the cedar, pines, yews, oak and beech mentioned above are specifically mentioned. This is the Tree Officers job as the site has been highlighted for development and the trees are therefore obviously at risk. The TPO could be applied without a visit if staff resources are an issue this as the trees are at risk and it is expedient to protect them, although the TPO applied would be an area order. The Council then has 6 months to confirm the TPO and could make any changes to make the TPO accurate at that point.

You could also ask the local Councillors and Parish Council of adjacent areas to request the same.

I hope this information is of use I ask that this opinion is not altered, forwarded or displayed without my consent.

Jon Bown

According to Appendix E: Detailed Site Assessment Tables:

Potential for Development and Suitability

The site is in an accessible location but is adjacent to existing industrial properties. This site is not considered suitable for development as a Gypsy or Traveller site due to its location adjacent to a busy and noisy highway.

Achievability

Site location adjacent to industrial properties and the A4 Bath Road is a significant barrier to the development of this site. Full highways and noise assessments and works to make the site suitable for caravan use would be required for development to take place in the medium-long term. There would also be costs associated with site clearance, the creation of an access and the relocation of the existing bus stop layby.

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

I agree with the following Site Constraints identified by the council's Site Assessment Document: "The site benefits from existing screening at its boundaries which also acts as a visual barrier to the industrial estate to the north of the A4 Bath Road at this location. Residential amenity and privacy at this location may be difficult to establish despite the existing screening at the roadside boundary. Site clearance to remove dense tree coverage would also be required prior to development. This would have cost implications. The site is adjacent to Ellsbridge House, a Grade II Listed Building due to reopen as a day care nursery in September 2012. Development at this location would affect the setting of the Listed Building. The site is located adjacent to the Ashmead Industrial Estate at Ashmead Road. Locations adjacent to industrial uses are not encouraged for permanent sites due to health and safety issues associated with these. The site location adjacent to the A4 Bath Road gives rise to noise issues. This would impact on the quality of life and health of site residents. The health and safety of site occupants, including children, is very important to site design and would require a detailed noise assessment prior to development".

## Schedule of comments: GT.14 Land near Ellsbridge House, Keynsham

I believe that the council is wrong in its assessment of the opportunity to form a new access or a shared access with the nursery because of the proximity to the Broadmead roundabout, the density of the traffic and the safeguarding issues of the nursery. No formal approach has yet been made to the nursery to discuss the options despite the obvious impact it would have on the viability of the plan.

The "existing screening" would have to be largely removed to make way for the site and/or a new access. You have not mentioned that removal of the trees, as well as being costly, will result in the loss of mature specimen trees, habitat for wildlife and a green lung. Objective 9 in the Assessment Matrix says "habitat features have been identified on this site which would require protection"

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No. In fact, I agree with the council's own Site Assessment that "This site is not considered suitable for development as a Gypsy or Traveller site due to its location adjacent to a busy and noisy highway" as well as all the additional reasons stated above.

Do you have any other general comments on the Preferred Options paper?

I have stated above all the planning issues, etc, that I feel, as a layman, are relevant. I would also like to add that I have been responsible for handling the registrations for Snapdragons Nursery at Keynsham and I have received approximately 20 phone calls from local people who have asked me for details and reassurances about the plans for the adjacent site. Their concerns are to do with the safeguarding of their children should the site proceed. I have been unable to offer any reassurances and these people have not registered their children. I am of course not able to tell you about the people who have not contacted us at all because of the proposals, but going by the numbers above, this may be a considerable amount of lost business.

Last week we held a recruitment day and 10 confirmed applicants did not attend. One later contacted us to say that she had reconsidered her application in light of the proposals. She did not feel able to give up a secure job for one that she felt may be in danger.

I have also received emails, including the one below:

FROM: [Name Withheld by Snapdragons]  
SUBJECT: RE: OPEN DAYS AT SNAPDRAGONS KEYNSHAM

Good Afternoon,  
I have been informed that the local council has put in an application for a Gypsy Site on land next to Ellsbridge Hse. Please can you tell me how this will impact on your nursery, how close will it be and what extra security/segregation arrangements will be in place.

I am not happy at the thought of this proposal and if it went ahead I would almost certainly not send my child to the Nursery.

Regards

[Name Withheld by Snapdragons]

Respondent: 4214 / 1 Name: Ms Alison Dymond Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

GT.14

May Gurney are currently contracted to Bath and North East Somerset Council to collect recyclate throughout the district. All the recyclate that is collected is brought to our transfer station located off Ashmead Rd, Keynsham. The building that we use to temporarily store and process the recyclate is directly adjacent (to the north) of the proposed site GT.14.

Your assessment table (Site Assessment Report) does reference the industrial estate to the north of site GT.14, but it does

**Schedule of comments: GT.14 Land near Ellsbridge House, Keynsham**

not specify the type of industry within the industrial estate. Your assessment table also goes on to reference an issue of noise, mainly from the A4. The main concern of ours with the proposed GT.14 site is that of noise that is generated from our recyclate processing/storage.

Our recycling collection vehicles return the depot twice a day (mid morning to midday and in the afternoon) to off load the recyclate. Glass makes up a fair proportion of the recyclate and this has to be tipped out of stillages into storage bays using fork lift trucks. This process can be very noisy and our staff have to wear ear protection when carrying out this process. We also have to load the glass into large LGV trucks at least 3-5 times a week so that the glass can be recycled elsewhere. This process is also very noisy. Although the building will naturally screen some of this noise we believe that the noise will potentially create an environmental noise issue for anyone that is living directly adjacent to the works.

We also have fire escape doors (3 no.) positioned on the side of the building that faces the proposed GT.14 site. We would need to ensure that these remain clear of any obstruction so that our staff can evacuate the building to a safe point away from the building in the event of a fire.

A further potential issue could be the location of a large electrical sub station positioned adjacent to the proposed GT.14 site. This is shown on your drawing on the western side of the boundary of the GT.14 site. I am not aware of any limitations or safe exclusion zones that are required around sub stations but I would encourage Bath and North East Somerset to make sure that the position of the sub station does not affect the possible development of the site.

We would also like to raise the possible issue of unauthorised access into our works, i.e. A robust fence line would need to be installed to deter access from the GT.14 site into our premises. Some of the activities that we carry out within the works building are extremely dangerous and we would need to be 100% sure that no children or adults get into our site as they could bring serious harm to themselves and others.

Site commenting on: **GT.14 Land near Ellsbridge House, Keynsham**

Do you agree with the Council's assessment of opportunities and constraints on this site?

Yes I agree with some of the constraints listed in Appendix E: Detailed Site Assessment Table. Namely your assessment that there are health and safety issues associated with the location being adjacent to an industrial estate and that of noise, albeit mainly associated with the noise from the A4.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No.

Do you have any other general comments on the Preferred Options paper?

Respondent: 4224 / 1 Name: Mr Joe Burbage Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

A. The GT14 site is 0.3 hectares of long established densely populated woodland of approximately 150 trees which will have to be destroyed and removed. B&NES Council should be placing a preservation order on this woodland not destroying it.

B. The GT14 site is wedge shaped and is between an Industrial Estate and the heavily trafficked A4. Access would require the relocation of a well-used bus stop. There is also a public footpath and an open stream which eventually feeds into the River Avon approximately 1 mile to the North and to the East is the Grade II listed building Ellsbridge House opening as a Childs Nursery.

C. There are long established residential properties along the Bath road. These properties are directly facing Southern boundary of the proposed GT14 site.

D. The existing woodland on the site is an essential feature for the whole area providing both a visual and noise barrier

between the residential properties on the Bath Road and the Ashmead Road Industrial Estate which is on the Northern boundary of the site.

E. There have been numbers of accidents in this location. The latest accident happened on the 10th July 12 just past the A4 Broadmead Roundabout heading towards Saltford nearby to the location of the B&NES Council proposed access to the GT14 site. This resulted in a large number of emergency vehicles attending. It must have been considered a serious accident because three fire appliances, an ambulance, an emergency doctor vehicle and police cars were in attendance whilst the road was closed for a period.

F. Many years ago a planning proposal WK113/D was made by old Wansdyke Council to store caravans on the same site now being considered as GT14. This proposal was rejected as access to the site was considered too dangerous.

G. Policy CP11 of the Draft Core Strategy includes a number of requirements for assessing site suitability. One of which is local community services and facilities, including shops, schools and health facilities, should be accessible by foot, cycle and public transport.

- A. Chandag Infant has 180 places with 172 on roll already for 2012
- b. Chandag Junior has 272 places with 262 on roll already for 2012
- c. Wellsway has 1050 places with 1053 on roll already for 2012
- d. Therefore the local schools could not cope with the additional children.

Site commenting on: **GT.14 Land near Ellsbridge House, Keynsham**

Do you agree with the Council's assessment of opportunities and constraints on this site?

- a. No - I do not agree that the site benefits from existing screening acting as a visual barrier to the Industrial Estate. It is the density and depth of the whole site woodland provides the visual and noise barrier to the Industrial Estate not just a few trees on the boundary.
- b. The site is adjacent to the Grade II listed building Ellsbridge House. Development at this location would affect the setting of the Ellsbridge House Listed Building.
- c. The site fails to meet the criteria for Health and Safety for the following reasons:
  - a. The site adjoins an existing Industrial Estate. The criteria dictates sites should not be located near to Industrial Estates.
  - b. Noise levels due to the heavily trafficked and noisy A4.
  - c. The site will be a high risk site for children as they will have easy access onto the very dangerous A4 as well as easy access to a refuse sorting centre in the industrial estate.
- d. The Woodland Trust is trying to encourage children to locally plant trees to breathe fresh air into their neighbourhood. When we have such a mature wooded area already in existence it seems ludicrous to destroy it.
- e. There should be a protected species study on the site proposed as GT14 as we regularly see Bats in our garden and suspect that they reside in the woodland in question.
- f. I do agree with B&NES statements in the Detailed Site Assessment Report which states:
  - a. This site is not considered suitable for development as a Gypsy or Traveller site due to its location adjacent to a busy and noisy highway.
  - b. The site fronts the heavily trafficked A4 in close proximity to the Broadmead roundabout junction. The formation of any additional access in this location would be resisted and not in the interests of highway safety, particularly given the need for access by large / towing vehicles and caravans.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No

Do you have any other general comments on the Preferred Options paper?

- a. I don't believe that B&NES can proceed with this GT.14 site proposal.
- b. When reading the scoring matrix it is nonsensical as GT14 was 15th out of 23 sites considered. With that in mind how

has GT14 ended up in the top 6 sites for consideration?

- c. There is considerable safety issues associated with the site as previous detailed, meaning that the site is completely in the wrong place for the proposed development.
- d. Previous planning has been refused on the site by B&NES council due to access issues.
- e. Development at this location would affect the setting of the Ellsbridge House Listed Building.
- f. The existing dense woodland on this site already provides an essential need. If the woodland was destroyed it would:
  - a. Have a devastating impact on the whole landscaping of this district including the Grade II Listed Building Ellsbridge House.
  - b. Open up the noise and visual impact of the Industrial Estate to the Bath Road.
- g. As previously mentioned, the woodland should not be destroyed it needs to have a preservation order put on it.
- h. Local schools could not cope with the additional demand.

Respondent: 4231 / 1 Name: Ms Jo Burbage Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

- a. The GT14 site is 0.3 hectares of long established densely populated woodland of approximately 150 trees which will have to be destroyed and removed. B&NES Council should be placing a preservation order on this woodland not destroying it.
- B. The GT14 site is wedge shaped and is between an Industrial Estate and the heavily trafficked A4. Access would require the relocation of a well-used bus stop. There is also a public footpath and an open stream which eventually feeds into the River Avon approximately 1 mile to the North and to the East is the Grade II listed building Ellsbridge House opening as a Childs Nursery.
- C. There are long established residential properties along the Bath road. These properties are directly facing Southern boundary of the proposed GT14 site.
- D. The existing woodland on the site is an essential feature for the whole area providing both a visual and noise barrier between the residential properties on the Bath Road and the Ashmead Road Industrial Estate which is on the Northern boundary of the site.
- E. There have been numbers of accidents in this location. The latest accident happened on the 10th July 12 just past the A4 Broadmead Roundabout heading towards Saltford nearby to the location of the B&NES Council proposed access to the GT14 site. This resulted in a large number of emergency vehicles attending. It must have been considered a serious accident because three fire appliances, an ambulance, an emergency doctor vehicle and police cars were in attendance whilst the road was closed for a period.
- F. Many years ago a planning proposal WK113/D was made by old Wansdyke Council to store caravans on the same site now being considered as GT14. This proposal was rejected as access to the site was considered too dangerous.
- G. Policy CP11 of the Draft Core Strategy includes a number of requirements for assessing site suitability. One of which is local community services and facilities, including shops, schools and health facilities, should be accessible by foot, cycle and public transport.
- A. Chandag Infant has 180 places with 172 on roll already for 2012
- b. Chandag Junior has 272 places with 262 on roll already for 2012
- c. Wellsway has 1050 places with 1053 on roll already for 2012

d. Therefore the local schools could not cope with the additional children.

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

a. No - I do not agree that the site benefits from existing screening acting as a visual barrier to the Industrial Estate. It is the density and depth of the whole site woodland provides the visual and noise barrier to the Industrial Estate not just a few trees on the boundary.

B. The site is adjacent to the Grade II listed building Ellsbridge House. Development at this location would affect the setting of the Ellsbridge House Listed Building.

C. The site fails to meet the criteria for Health and Safety for the following reasons:

a. The site adjoins an existing Industrial Estate. The criteria dictates sites should not be located near to Industrial Estates.

B. Noise levels due to the heavily trafficked and noisy A4.

c. The site will be a high risk site for children as they will have easy access onto the very dangerous A4 as well as easy access to a refuse sorting centre in the industrial estate.

D. The Woodland Trust is trying to encourage children to locally plant trees to breathe fresh air into their neighbourhood. When we have such a mature wooded area already in existence it seems ludicrous to destroy it.

E. There should be a protected species study on the site proposed as GT14 as we regularly see Bats in our garden and suspect that they reside in the woodland in question.

F. I do agree with B&NES statements in the Detailed Site Assessment Report which states:

a. This site is not considered suitable for development as a Gypsy or Traveller site due to its location adjacent to a busy and noisy highway.

B. The site fronts the heavily trafficked A4 in close proximity to the Broadmead roundabout junction. The formation of any additional access in this location would be resisted and not in the interests of highway safety, particularly given the need for access by large / towing vehicles and caravans.

Do you agree that the potential pitch provision be taken forward as a formal allocation?

No

Do you have any other general comments on the Preferred Options paper?

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b. When reading the scoring matrix it is nonsensical as GT14 was 15th out of 23 sites considered. With that in mind how has GT14 ended up in the top 6 sites for consideration?

c. There is considerable safety issues associated with the site as previous detailed, meaning that the site is completely in the wrong place for the proposed development.

d. Previous planning has been refused on the site by B&NES council due to access issues.

e. Development at this location would affect the setting of the Ellsbridge House Listed Building.

f. The existing dense woodland on this site already provides an essential need. If the woodland was destroyed it would:

a. Have a devastating impact on the whole landscaping of this district including the Grade II Listed Building Ellsbridge House.

b. Open up the noise and visual impact of the Industrial Estate to the Bath Road.

G. As previously mentioned, the woodland should not be destroyed it needs to have a preservation order put on it.

H. Local schools could not cope with the additional demand.

Respondent: 4313 / 1 Name: Mr Nigel Ryan Organisation:

Do you have any evidence or information about any of the sites set out in the Preferred Options document which will help Bath and North East Somerset Council to determine whether they are available, suitable and achievable for Gypsy, Traveller or Travelling Showpeople provision?

Site commenting on: GT.14 Land near Ellsbridge House, Keynsham

Do you agree with the Council's assessment of opportunities and constraints on this site?

With reference to the proposed gypsy travellers site on Ellsbridge House land,Bath Rd Keynsham I would like register my strong objections . To propose this site in what is a built up area is absurd , it will undoubtedly reduce property values , if indeed properties could be sold at all next to a gypsy travellers site , and also there is a childs nursery right next to the proposed site , also the possable increase in cleanliness which has been proven on other sites of this nature is a major concern , I would like to reiterate my strong objections to this proposal ,

Do you agree that the potential pitch provision be taken forward as a formal allocation?

Do you have any other general comments on the Preferred Options paper?