

**Consultation on the B&NES Local Plan
Issues & Options Document (Phase 1a)
22 November 2017 - 10 January 2018**

**COMMENTS
FORM**

You are invited to comment on the Issues & Options document.

You are strongly encouraged to make your comments on-line via the Local Plan consultation portal www.bathnes.gov.uk/localplan

However, if you are using this form, please complete the form by filling in Part 1 with your contact details and use Part 2 for your response to the questions in the Issues & Options document. It would be helpful if you could complete a separate form for each question in the document you are responding to.

Please send your completed form(s) using email to local_plan2@bathnes.gov.uk. Alternatively you can post the form to Planning Policy, Bath & North East Somerset Council, Lewis House, Manvers Street, Bath BA1 1JG.

Your comments will be used to inform the next stage of the Local Plan preparation.

Part 1: Contact details			
Email is the Council's preferred method of communication and enables us to contact you quickly and efficiently. Please also provide a postcode with details of your address.			
Personal Details		Agent Details (if applicable)	
Title		Title	
First Name		First Name	Chris
Surname		Surname	Beaver
Job Title <i>(only if applicable)</i>		Job Title	Director
Organisation <i>(only if applicable)</i>	Andrews Marquees Ltd	Organisation	PlanningSphere Ltd
Email	c/o Agent	Email	chris@planningsphere.co.uk
Address	Oaklea	Address	Coworking Bath
	Sleep Lane		The Guild, High Street
	Whitchurch		Bath
Postcode		Postcode	BA1 5EB
Date		Date	8 th January 2018

Part 2:

Which question in the Issues & Options document are you commenting on? ...Q1, Q3, Q13b and Q14a.....

Questions relating to the options and paragraphs have been numbered in the document for you to refer to in your response.

2.2 Please make your comments as succinct as possible.

PlanningSphere act on behalf of, Andrews Marquees Ltd, who are the freehold owners of land at Oaklea, Sleep Lane, Whitchurch. We are instructed to comment on the Council's current round of consultation on its Issues and Options Local Plan Document.

Vision Section of Local Plan Document

Q1 - Have we identified the critical issues facing the District over the next 20 years?

We note that the Issues and Options document intends to allocate strategic sites at locations identified in the Joint Spatial Plan (JSP) and that in addition, other development opportunities will be identified and allocated building on those already identified in the Place Making Plan. The preparation of the Core Strategy Review and the JSP will therefore take place in parallel. Given that the Review is at a relatively early stage, involvement at this time is clearly crucial in helping to influence and shape this review, hence our comments set out below.

Paragraph 3.01 of the Issues and Options document is welcomed in that it notes that the new Local Plan has a key role in establishing how the 'non-strategic growth' of around 700 new dwellings will be delivered and that this figure is in addition to the existing Core Strategy growth requirement and effective from 2016 (the start of the new Local Plan period).

Paragraph 3.02 is also supported in stating that the approach to development outside Bath and the two Joint Spatial Plan Strategic Development Locations will relate to the sustainability of locations in terms of access to employment opportunities, facilities and services, as well as to public transport, the environmental and other impacts of development and the ability to meet infrastructure requirements effectively.

We welcome the commitment to a strategic Green Belt review and we emphasise the need to release Green Belt land in sustainable locations; the need to identify both a portfolio of strategic sites and smaller readily deliverable sites for release from the Green Belt that will enable a balanced approach to housing delivery and the identification of sites in otherwise sustainable locations with good public transport links and surrounding infrastructure where landscape and other impacts can be limited.

Given the ongoing pressing need for the identification of land for housing within Bath and North East Somerset, we highlight the importance of including and allocating additional non-strategic sites as part of the Core Strategy Review process to ensure that the combined Local Plan has identified a sufficient supply of housing sites to meet housing need in the new Local Plan period 2016-2036.

The identification and allocation of these smaller, non-strategic sites, would also meet the aspirations set out in the Housing White Paper for diversifying the housing market and enabling faster delivery of sites. The Housing White Paper provides an analysis of housing delivery issues, and sets out a direction of travel in terms of government policy to enhance the diversity of supply. The three solutions advocated in the Housing White Paper, p14-15, are: (1) plan for the right homes in the right places; (2) build more homes faster; and (3) to diversify the housing market. Key to increasing housing delivery through diversifying the housing market is the role of SME builders and the supply of suitable sites for this part of the construction sector. In particular, paragraph 1.29 states:

"Policies in plans should allow a good mix of sites to come forward for development, so that there is choice for consumers, places can grow in ways that are sustainable, and there are opportunities for a diverse construction sector. Small sites create particular opportunities for custom builders and smaller developers. They can also help to meet rural housing needs in ways that are sensitive to their setting while allowing villages to thrive."

Please note that names and comments will be published

Furthermore, small sites are often considerably less constrained than larger sites and are by their nature more attractive to SME builders who do not want lag times between site purchase and delivery, which would further support the aspirations of the Housing White Paper in terms of the need to accelerate delivery to boost the supply of housing.

The Core Strategy Review process therefore needs to ensure that a variety of sites are identified as part of the District's housing supply.

Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?

We consider that *Option 1: Continue the hierarchical approach* is the most likely to option to meet the high level of housing need in the District, provide a sustainable pattern of development, particularly with respect to access to public transport and services, whilst retaining the character and vitality of rural communities. However, the wording of any Policy approach when formulated should recognise that there may also be opportunities at the edge of settlements such as Whitchurch for small scale sustainable development in land which is currently green belt land, especially where this would compliment more strategic Green Belt release and result in a logical recalibration of the Green Belt. These sites could be included as part of the overall strategic allocation or be allocated separately as part the non- strategic allocations but would allow additional flexibility in terms of helping to assist faster delivery, as they would not have the long lead in and build out times of larger sites and would also diversify the housing land market, as well as being attractive to SME builders who provide for an important component of housing delivery.

Strategic Development Location - Whitchurch

Q13b - How can this vision be delivered? and

Q14a - Is this the right approach?

Broadly speaking we think that the strategic approach to development in Whitchurch offers a sustainable way of accommodating housing need whilst maintaining the character and distinctiveness of Whitchurch Village. Whitchurch has a number of existing services and facilities including a primary school, church, pub/restaurant and shops. There are regular bus services to the cities of Bath, Bristol and Wells as well as the wider area with links to mainline rail services. Bristol City Centre is approximately 8 km away and the City of Bath lies approximately 21 km west of Whitchurch. There is also a cycle path route that provides a traffic free route part way into Bristol City Centre. This clearly demonstrates that Whitchurch is a sustainable location for residential development. This has been recognised in the Publication Draft of the West of England Joint Spatial Plan which identifies Whitchurch as a location for Strategic Growth.

The proposed direction of strategic growth, south along the A37 and associated Green Belt release would be logical in terms of protecting both views of the Scheduled Ancient Monument at Maes Knoll and the gap between Whitchurch Village and Bristol, and would also benefit from the additional transport opportunities offered by the proposed A4/A37 link. We consider that any release of green belt should also recognise the opportunities for smaller sites on the southern developed edge of the Whitchurch which would also help to meet these aspirations for Whitchurch and make a modest contribution to meeting overall housing numbers. It would be illogical to retain a small sliver of green belt on the existing settlement fringe as it would no longer serve any Green Belt purpose should the broad level and direction of development proposed in the Core Strategy review proceed.

Currently Staunton Manor Farm (Horse World) between Sleep Lane and Staunton Lane has been released from Green Belt to allow its development for housing. The most recent HELAA suggests that a further site to the east that is currently a transport depot will become available for development, together with some adjacent non-green belt land. Our client's land at Oaklea, Sleep Lane would form a small, readily deliverable extension to the wider Horseworld site, increasing housing supply by around 20 units that would readily integrate with both the existing urban fabric to the west of Sleep Lane and new development to the north and east. The site is not otherwise constrained and in infrastructure terms its development would not be reliant on the completion of the surrounding consents.

The latest iteration of the Housing and Economic Land Availability Assessment identifies a number of sites to the east and west of the A37 that are currently being promoted and could form the basis of the proposed extension to Whitchurch dependent on the outcome of the Core Strategy Consultation and Green Belt Review. However these are all large sites that would have relatively long lead-in and build out times, and we consider there is a need to introduce some flexibility in the approach to delivery in this location, by identifying smaller, readily available sites such as the site at Oaklea, Sleep Lane, Whitchurch. As part of our consultation response, we enclose the following documents which illustrate how a residential scheme of circa 20 No. homes, based on 2 storey houses (2-4 bedroom) with small gardens and associated parking, could be accommodated on land at Oaklea, Sleep Lane:

- Site Location Plan – Keep Architecture
- Proposed Sketch Scheme Layout – Keep Architecture
- Wider Context Plan – Keep Architecture
- Transport Technical Note - WYG

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

2.3 Are there any other comments you wish to make on the issues and options?

No.

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

See our website for more information and to make your comments on-line:

www.bathnes.gov.uk/localplan

Technical Note 01

Project:	Sleep Lane, Whitchurch	Office:	Bristol
Project No:	A098701	Prepared by:	Sam Lewis
Client:	Andrews Marquees Ltd.	Approved by:	Luke Craddy
Date:	02.12.2016	Status:	Final
Subject:	Technical Note 01: Transport Feasibility Report		

1 Introduction

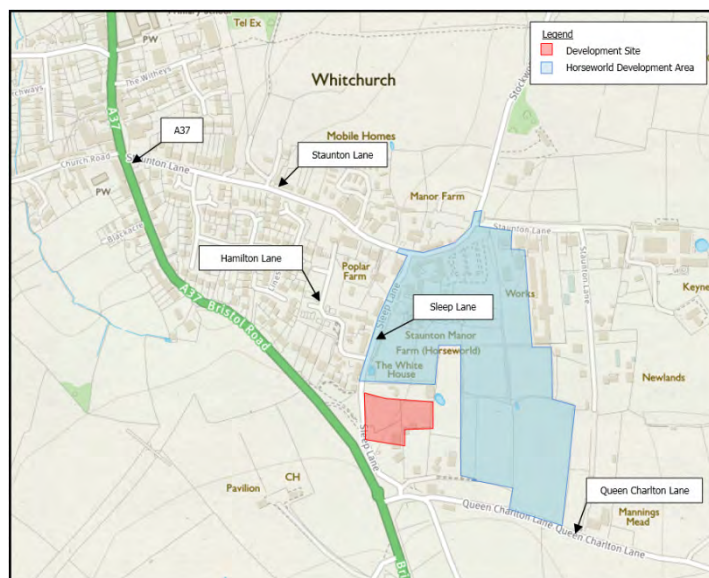
- 1.1 WYG has been commissioned by Andrews Marquees Ltd. to prepare a Technical Note, outlining the feasibility for a residential development on a site located adjacent to Sleep Lane, Whitchurch. The proposed development will incorporate a vehicular access from Sleep lane, in the form of a simple priority controlled T-junction.
- 1.2 This Technical Note considers the feasibility for including the proposed development site as a suitable site for consideration for allocation within the Local Plan. This document highlights the accessibility of the site by all modes of transport and also confirms that a suitable access arrangement can be achieved.
- 1.3 This review is based on the site being able to accommodate in the order of 25 dwellings.

2 Existing Highway Condition

Site Location

- 2.1 The development site is located on the south eastern fringe of the City of Bristol, in southwest Whitchurch. Its location within Bristol is shown in **Figure 2.1**.

Figure 2.1 Site Location Plan



- 2.2 The proposed development site is located to the east of Sleep Lane with residential properties located to the south and west. The site is located to the south and west of the proposed Horseworld

redevelopment, which comprises approximately 230 residential units with two separate Planning Applications having been made for the full site development.

Local Highway Network

- 2.3 The local highway network in relation to the site is shown in **Figure 2.1**.
- 2.4 The proposed development site fronts Sleep Lane to the east which is subject to a 20mph speed limit. Sleep Lane provides a connection from Staunton Lane to the A37, via Queen Charlton Road. Staunton Lane to the north is subject to a 30mph speed limit. Staunton Lane provides a connection to Stockwood to the west and to the A37 to the east.
- 2.5 The A37 is major link road which provides access to the centre of Bristol and connections to a number of key settlements located within north east Somerset and the wider area. It is a subject to a 40mph speed within the vicinity of the proposed development site, but becomes derestricted as it leaves the urban limits of Bristol.

3 Sustainable Transport Review

Local Facilities

- 3.1 The development site benefits from being located within 600m of the centre of Whitchurch and 1.3km from the centre of Stockwood. These areas contain a number of services and facilities which are likely to be beneficial to future residents of the proposed development site.
- 3.2 The proposed development site is located within 8km of the centre of Bristol, which contains a significant number of employment opportunities and retail / commercial facilities. In addition, the site is located within close proximity of a number of retail parks / industrial estates, such as the Brislington and South Bristol Parks, which provide further opportunities for employment and retail trips.

Access by Walking

- 3.3 Pedestrian access to the site will be provided from Sleep Lane. The site is well connected to the local pedestrian network and it is considered that walking will likely be a favourable option for future residents that may wish to access the local facilities contained within Whitchurch.
- 3.4 The site is located within approximately a 600m (less than 8 minutes) walking distance from the Village Centre, which provides a level of retail and some employment opportunities. Additionally, the site is located within a 10 minute walk (800m) of the Whitchurch Primary School and a 16 minute walk (1,300m) of Stockwood Medical Centre.
- 3.5 As part of the proposed access proposals, a footway connection will be provided from the site to the existing local pedestrian network. Further details of this are provided over the page.

Access by Cycling

- 3.6 The development site is fronted by Sleep Lane to the west, which forms part of the National Cycle Network (NCN). Route 3 of the NCN forms a signed route connecting the wider parts of Bath and North East Somerset to Bristol City Centre. Route 3 also connects into the Bristol Cycle Network (BCN), which enables easy access to the wider Bristol area.
- 3.7 Bristol City Centre is located within 8km of the development site, which is considered to be the key employment centre for the area. The city can be accessed in approximately 30 minutes by cycling, which is likely to be favourable for future residents of the site to access the retail, leisure, educational and employment opportunities which are provided within the city. It is considered likely

that some future residents may find cycling to / from the development site an attractive option for regular travel.

- 3.8 This therefore helps to secure site accessibility and provide an opportunity for future residents to consider modes of travel other than the car.

Access by Bus

- 3.9 The proposed development site is located within a short walk (approximately 200m) from the nearest bus stops. The northbound A37 bus stop benefits from a lay-by and shelter which incorporates seating and lighting together with a timetable casement with stop specific timetable information. The southbound A37 bus stop also benefits from a lay-by, a timetable casement with stop specific timetable information and high kerbs for easy boarding.
- 3.10 The two most frequent services (376 and 379) combine to provide three buses an hour in each direction, with travel to Bristol City Centre entailing a journey time of approximately 22 minutes. These bus services provide a high quality public transport link to Bristol City Centre suitable for all employment, retail, education and leisure purposes.
- 3.11 There are regular opportunities for a number of trips generated by the site to be undertaken by public transport. It is considered that due to the regular provision of bus services to the local area, travel by public transport is likely to be a favourable option for future residents.

Access by Rail

- 3.12 The closest railway station for future residents of the site is Keynsham Railway Station, which is located approximately 6.1km east of the site. The station is operated by Great Western Railway, which operates local train services between Taunton, Cardiff and Bristol. The station can be accessed in approximately 24 minutes by cycling or by using the 636 bus service and benefits from regular connections to Bristol and Bath.
- 3.13 Bristol Temple Meads is located approximately 7.7km north of the site, from where a wider range of services are available, operating along the Cardiff to London route. The station can be accessed in approximately 30 minutes by cycling or within 25 minutes by bus.
- 3.14 It is considered travel by train could potentially be a favourable option for future residents, particularly if travelling to Bath or further afield, reducing the requirement for car travel to access the wider area for additional retail, leisure and employment opportunities.

4 Vehicle Access

- 4.1 The proposed development will incorporate vehicular access from Sleep Lane, in the form of a simple priority controlled T-junction. An indicative plan of the proposed vehicular access for the development is shown on **Drawing A098701_SK01** provided within **Appendix B**.
- 4.2 As part of the access proposals, a new footway will be provided to connect the development to the existing footway located along Sleep Lane, which forms part of the local pedestrian network. By installing this additional footway link, the development will ensure a continuous link is provided to enable trips on footway to / from the development along with enabling safe and direct access to the A37 bus stops.



5 Summary and Conclusion

Summary

- 5.1 The proposed development consists of the creation of a 25 dwelling residential development on a site located adjacent to Sleep Lane, Whitchurch.
- 5.2 The proposed development site benefits from good accessibility for pedestrians, cyclists and public transport users. It is located adjacent the existing pedestrian network of Whitchurch, and within close proximity of Route 3 of the National Cycle Network. The proposed development site benefits from a nearby bus stop which provides regular connections to Bristol City Centre, Bath and other destinations within the South Bristol and Bath & North East Somerset area. The site also provides an opportunity to access the wider area by rail, as part of a multi-modal journey.
- 5.3 The location of the site to provide good opportunities to encourage a reasonable level of trips to / from the local and wider area to be undertaken by sustainable modes of transport, thereby reducing the need for new transport infrastructure, other than the site access, to be delivered as part of this development.
- 5.4 Access to the local highway network will be provided from Sleep Lane in the form of a priority T-junction, which given the size of development that can be accommodated on site is considered appropriate to provide safe and suitable access for vehicles accessing / egressing the site.

Conclusion

- 5.5 Based on the findings of this transport and highway review, the development of the site at Sleep Lane is considered acceptable when allowing for site accessibility and the ability to provide appropriate access arrangements.
- 5.6 As part of the access arrangements, footway connections will be provided into the site with an additional connection introduced to ensure a continuous link to the existing footways along Sleep Lane.



Appendix A

PROPOSED SITE LAYOUT



NOTES
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This drawing has been produced for Helen Andrews for the proposed development at Sleep Lane, Whitchurch and is not intended for use by any other person or for any other purpose.

Responsibility is not accepted for errors made by others in scaling from this drawing.

All construction information should be taken from figured dimensions only.

All omissions and discrepancies to be reported to Keep immediately.

DRAFT
Awaiting information regarding utilities



Key
— Site Boundary

Draft issue	JS	NS	25/11	-
Notes	DR	CH	Date	Rev



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Project
Sleep Lane

Drawing
Illustrative Masterplan

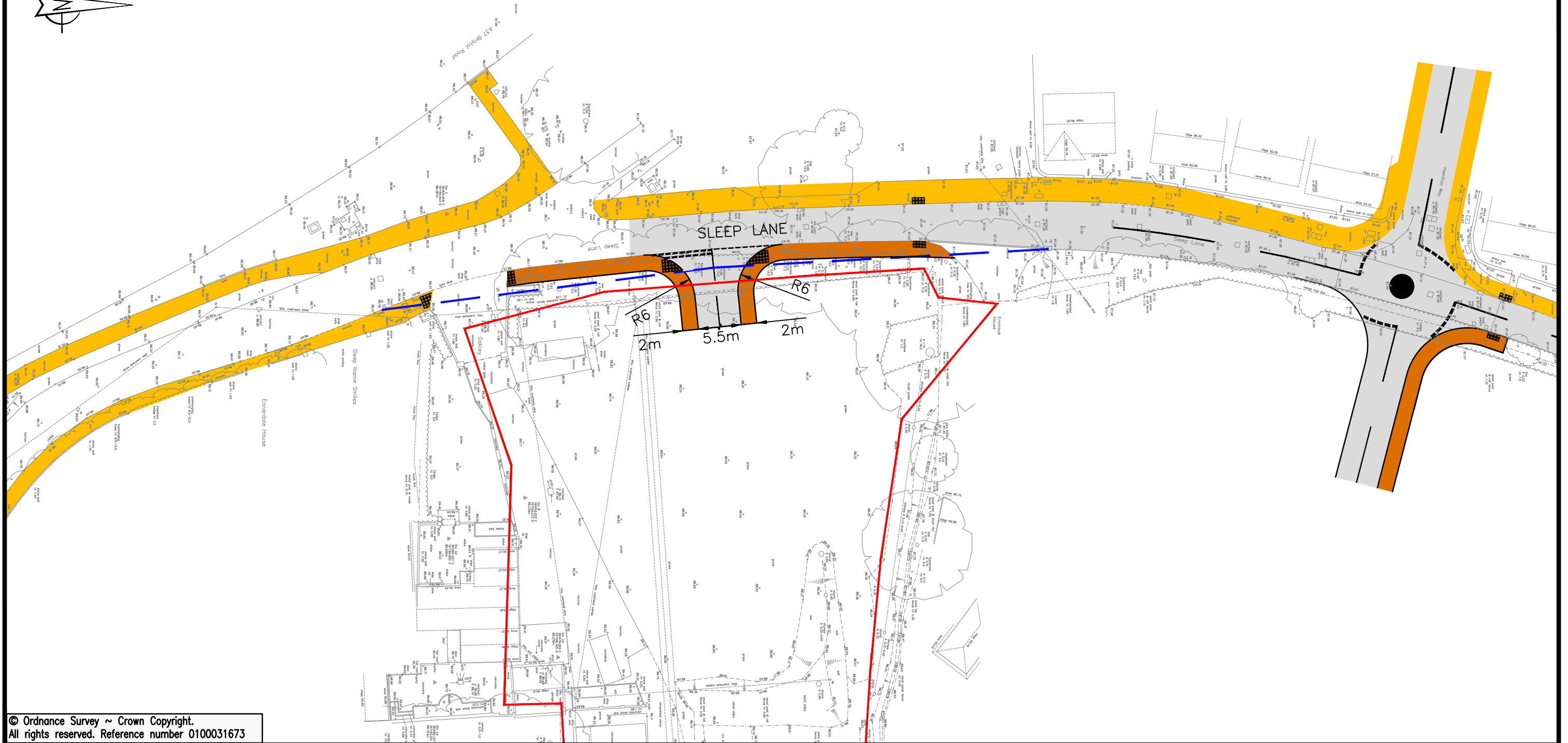
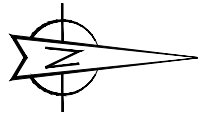
Drawing number
1289.F.001

Scale
1:500 @ A3

Revision number



Appendix B PROPOSED VEHICULAR ACCESS



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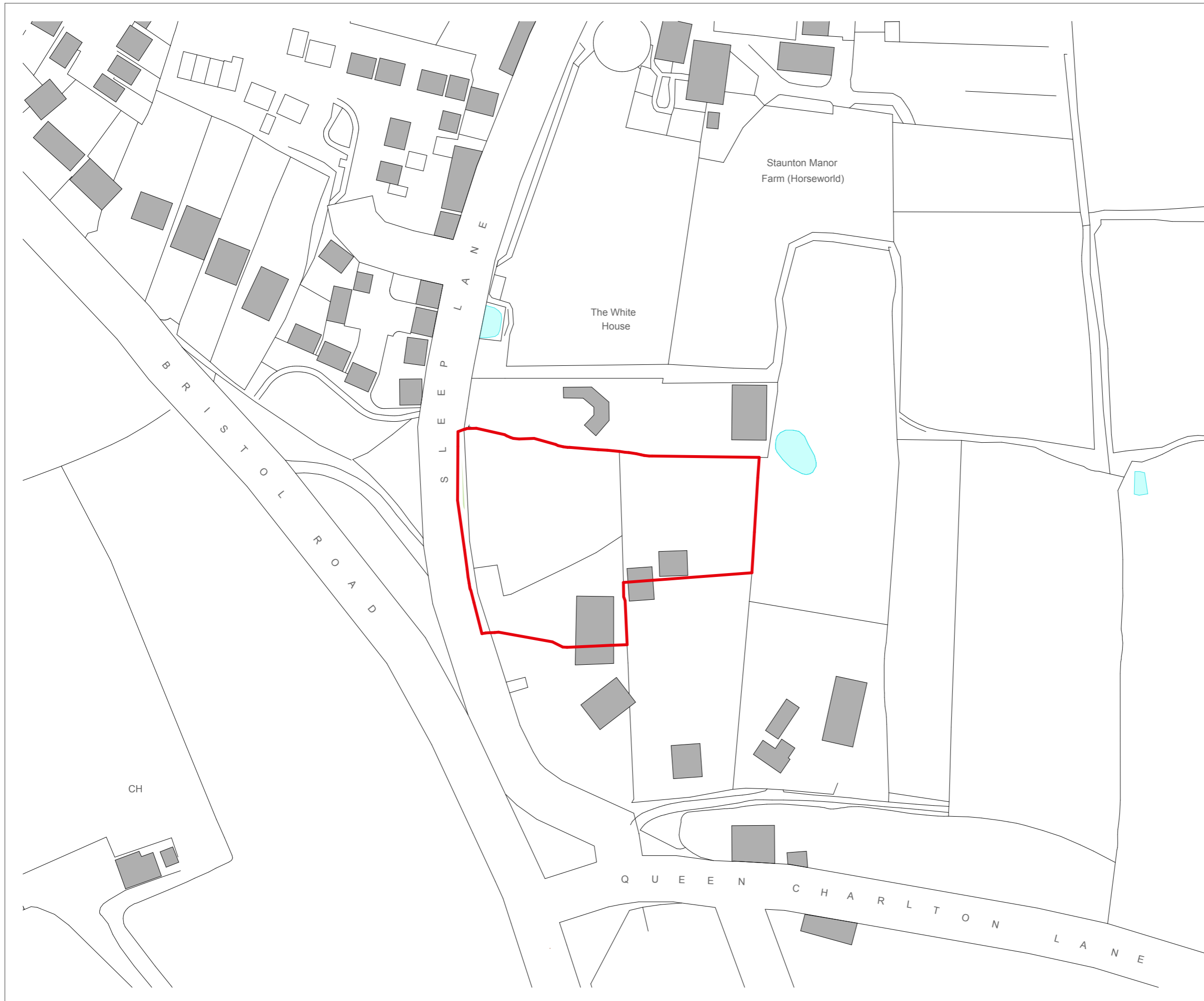
REV	DETAILS	DRAWN	CHECKED	DATE

KEY	
—	SITE BOUNDARY
—	VISIBILITY SPLAYS (2.4m x 43m)
	PROPOSED DROPPED KERBS / TACTILE PAVING
—	PROPOSED FOOTWAY
—	PROPOSED CARRIAGEWAY
—	EXISTING FOOTWAY

PROJECT: SLEEP LANE, WHITCHURCH	
DRAWING TITLE: PROPOSED SITE ACCESS	
DRAWN: BJ	CHECKED: AP/LC
DATE: 21.10.2016	SCALE: 1:500
SHEET SIZE: A3	DRAWING NUMBER: A098701_SK01

CLIENT: ANDREW MARQUEE LTD
<p>WYG Transport part of WYG group</p> <p>90 Victoria Street, Bristol, BS1 6DP t: 0117 925 4393 f: 0117 925 4239 e: transport.bristol@wyg.com</p>
REVISION: -

NOTE: THE PROPERTY OF THIS DRAWING AND DESIGN IS VESTED IN WYG ENVIRONMENT PLANNING TRANSPORT LTD. IT MUST NOT BE COPIED OR REPRODUCED IN ANY WAY WITHOUT THEIR PRIOR WRITTEN CONSENT.



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Key

— Site Boundary

Site Area = 0.57 ha (1.41 acres)

General issue	JS	NS	28/11	-
Notes	DR	CH	Date	Rev



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Project
Sleep Lane

Drawing
Location Plan

Drawing number
1289.E.001

Scale
1:1250 @ A3

Revision number
-



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Key

- Site Boundary
- - - Planning Application 14/05288/VAR Under Construction
- - - Planning Application 16/04615/FUL Submitted
- - - Planning Application 16/02055/FUL Submitted
- / / / Green Belt

General issue	JS NS 22/11 2016
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Notes	DR CH Date Rev
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Project
Sleep Lane

Drawing
Wider Context Plan

Drawing number
1289.E.002

Scale
1:2000 @ A3

Revision number



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DRAFT
Awaiting information regarding utilities



Key
— Site Boundary

Draft issue	JS	NS	25/11	-
Notes	DR	CH	Date	Rev



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Project
Sleep Lane

Drawing
Illustrative Masterplan

Drawing number
1289.F.001

Scale
1:500 @ A3

Revision number