

COMMENTS ON THE BANES DRAFT LOCAL PLAN 2016-36 PHASE IA ISSUES AND OPTIONS CONSULTATION

QUESTIONS 3 & 4

- 1 A blend of the Focussed and Dispersed Approaches could be considered. Given the identified downsides of each individual option, it would be reasonable to consider the benefits which might arise from an alternative which sought to make the most of the positives and minimise the negatives.
- 2 The scale of new development could be matched to the scale of the settlement and its facilities so as to minimise the sustainability issues arising from car travel. For example, the larger settlements/villages could be identified to accommodate reasonable levels of growth (as per the Focussed Approach) given the presence of a range of facilities and travel options. Smaller settlements might accommodate a lesser level of growth to accommodate local needs and, perhaps, help to maintain services.
- 3 The Hierarchical Approach appears inherently unsustainable given the travelling distances and dispersal which would result.
- 4 The spatial strategy options appear to focus materially on the influence of the presence of a school with capacity / expansion opportunities as a determinant of the suitability of a settlement to accommodate growth. However, the supporting documents suggest that the major villages with a range of facilities do not have schools with capacity. Given that the Local Plan is planning for a 20 year period, it appears a little short-sighted to focus the spatial planning of BANES on the ability of a local school to accept new students.
- 5 Presumably, there are opportunities for schools to expand if considered in detail - whether on the current site or another. The supporting evidence does not appear to analyse the potential of the schools in detail, although other facilities are given more focussed interrogation.
- 6 There seems to be something of the tail wagging the dog if the future spatial planning of the area is dictated by the circumstances of certain schools at the current time. Shouldn't the Local Plan be planning for the future of education as well ?

CAROLINE DAWSON MRTPI
JANUARY 2018

CAROLINE DAWSON MRTPI



From: Dean Organ Builders & The Music Box Shop
Sent: 04 January 2018 13:33
To: Local Plan
Subject: respond to your Local Plan Consultation.

Dear Sirs

I write to respond to your Local Plan Consultation.

You are quite wrong when you describe Whitchurch as a sustainable development location which could take 2,500 houses. If you build this amount of houses in the suggested area you will destroy the village of Whitchurch once and for all. The population of such a development will turn this village into a town and that will change the whole dynamic of the village and the way of life in the village. It is never acceptable or sustainable to develop an area which has little employment, services and health care.

You suggest a new link road between the A37 and A4 and that a transport study is currently underway. Nothing should be decided until this study is completed because if you get the decision wrong you could be creating a road that will actually not alleviate traffic and HGVs from the A37 and could create a short cut for the A4 when that road is busy. Vehicles could use this proposed road and journey back into Bristol via the A37 effectively creating more traffic, congestion and dangerous air quality.

Your survey must establish from the transport companies that currently use the A37, why they use this road in order to fully understand a full origin and destination for the HGVs, the same should be done for non HGV traffic.

No one denies that we need to improve the road system, but until you bypass Temple Cloud, Pensford and Whitchurch, you will not solve the A37 problems and you should not build houses in this number until it is proved you can ease traffic.

There is a route that could be considered which would alleviate HGV traffic for both Pensford and Whitchurch and improve traffic flow and enable you to provide an effective park and ride system. You should seriously consider enlarging the Chelwood roundabout and build a new road or improve considerably the current road from the Chelwood roundabout to meet up with The Globe roundabout. You could then link/improve the road from Chelwood up to the airport on the A38. The airport is due to grow and we need a proper linked up vision. With a road from Chelwood to The Globe / A4 and from Chelwood to the airport A38. This gives you then the perfect place for a park and ride at Chelwood which could put on buses to the centre of Bristol. These buses could also pick up from Whitchurch and Pensford on the way into Bristol, so giving a regular service from a park and ride at Chelwood. New shuttle buses over to the Newbridge park and ride so Bath was also accessible, and of course they could run up to the airport so giving a proper joined up transport system.

Such a transport system is the only way you will encourage greater use of buses / public transport. Once such a system was in place and new link roads established, it would be possible to put a 10 tonne weight limit except for access, though Pensford and Whitchurch to avoid HGV traffic in these villages, particularly the problems on Pensford Hill. If the same weight restriction was also put at the Happy Landings, HGV traffic could not then travel south through these villages.

In this way you would encourage less use of cars for commuters to Bath and Bristol and ease HGV traffic through villages that are unsuitable for it.

The aspiration of all the community living in Whitchurch is to keep it a village. Most villagers acknowledge we need some housing but what is required are small houses for first time buyers and downsizers, something we never get when new homes are built here. There are always homes available in this area over £275,000. Some have been on the market for over 6 months and have not sold, so this should show you that the larger houses are not what the market needs.

Your concept diagram for Whitchurch would destroy the village and its current community, as you would increase it beyond a village environment and turn it into a town. You even suggest creating a new local centre which would destroy the current village centre and damage the businesses in the

current centre. It is not sustainable or morally right to destroy the village in this way. If you change the centre of the village, you will kill its current community and turn it into a dormitory town with a new centre with no history and looking like every other modern box built town.

Your proposed pictures clearly indicate the type of modern looking box homes that do nothing to create community. There are many places that you have just not considered which would be better to site this amount of housing eg. Brislington / Hicks Gate. This area has many more sustainable qualities than Whitchurch. It is nearer to employment, train station, park and ride, Keynsham shops, better doctors surgeries and a crown post office. To develop near all these services and infrastructure is much more sustainable.

None of these services and infrastructure are available in Whitchurch which is why it is currently unsustainable for such a development.

It should also be considered that Bristol plans to build 2,500 homes at the old Whitchurch airport site and this is so close to the village of Whitchurch that it will affect the A37 and will mean that doctors and services etc. currently used by Whitchurch villagers will be under extreme pressure. It is evident that all the villagers in Whitchurch having made clear in their neighbourhood plan that they wish to protect their village and its green belt. When there are other brown field sites elsewhere that could be developed to give the housing requirement you should develop these sites first. It is also unclear if the housing figures are even going to be correct due to Brexit and the slow down in migration, the figures will no doubt need reassessing.

So many brown field sites that could be sustainable remain empty, such as the abandoned arena area next to Temple Meads and the old factory building at Midsomer Norton. I understand that BANES hope to create 1700 to 2000 new jobs at Somer Valley Enterprise Zone at Old Mills, then you should consider increasing the housing near this so that work and homes are adjacent. You could easily provide another 1500 houses here which would less than double the houses in Somer Valley. Yet you consider it better to increase Whitchurch from 203 to 1803, madness not sustainability. If you build in Whitchurch, which has little employment, travel by car to work is inevitable. You really do need to start having some joined up thinking on developing business and placing housing to feed that supply of jobs.

Part of the heart of Whitchurch village is the school which creates community as villagers walk their children to school, passing the businesses in the village. If you intend to build new schools out of the centre, then there is a chance the current village school would become obsolete. This would be a disaster for the village. The only consolation would be if the current village school could be earmarked to be the village health centre, so keeping a centre focus for the village. I would not really like to see it change from a school but to ring fence it as a health centre would serve the village well. Rather than destroying large areas of green belt with 2,500 homes in Whitchurch, it might be better to consider much smaller developments in each village which could still provide your numbers, say another 100 homes for Whitchurch considering that the village has already taken 250 houses in recent times, 100 for Pensford, 100 for Hinton Blewitt, 100 for Clutton, 100 for Temple Cloud, 100 Hallatrow, 100 Paulton, 100 Farrington Gurney, 100 Timsbury, 100 Compton Dando and the other 1500 in the Somer Valley ready to feed your new jobs at Old Mills.

The 100 houses in Whitchurch could be the starter homes and down size bungalows we do need, for once rather than high priced commuter houses we always get.

Employment in Whitchurch village is constantly stifled because you are constantly giving planning to turn the few commercial sites we have into housing, we have lost several sites in recent years to residential and are set to lose more with the planning granted on the car showroom in the centre of the village. Again, given not for starter homes but commuter homes without adequate parking facilities. Once again no thought from planners and no understanding of the area they are dealing with. This would have been a perfect site to have some 'in keeping' small shops with flats above and some terraced starter homes behind which would have enhanced the village, but once again a missed opportunity.

You ask in your plan about encouraging people to be more active and the provision of green spaces. Well this shows just how much you know about Whitchurch, because it already has many clubs for leisure eg. Cricket, football and rugby, many foot paths and beautiful fields used for agriculture. Building on these fields will not help provide more, you will just be taking it away. If you were to weight restrict Whitchurch and Pensford, so alleviating the HGV traffic, this would automatically make it more cycle friendly so again you need to consider the Chelwood roundabout road improvement idea in your road plan as this is probably one of the few ways to be able to bypass both Whitchurch and Pensford of heavy traffic. Without reduction of air pollution, noise and danger, you will not be able to encourage cycling and walking.

The latest plans for an underground system by the Mayor of Bristol make no attempt to take a route south to the Whitchurch area, hence if this is to be taken forward then houses should be sited near this system, not in an area with no route to this transport. If this was developed as currently proposed, houses in Whitchurch would have no interconnection to this transport, meaning that you will be creating a development which has no alternative to the car. Far better to put the houses near the proposed lines at Bristol airport, Bradley Stoke and Emersons Green.

There are also other problems to consider. Your extended position for the 2,500 houses on your concept diagram is in an area which has suffered from flooding and also is sited on limestone which has been known to have culverts and suffer from sink holes. Those who have lived here for generations have seen land shift and the A37 is always having problems with man holes and subsidence etc.

All around Whitchurch and Queen Charlton the area has been mined for limestone years ago, it is no coincidence that most of the old houses in this area are constructed from it. Hence you need to be very careful, this is not a suitable place for further development.

Yours sincerely
Richard Dean

From: carolyn [REDACTED]
Sent: 09 January 2018 17:56
To: Local Plan
Subject: Respond to your Local Plan Consultation

Subject: I write to respond to your Local Plan Consultation.

Dear Sirs

I write to respond to the local Plan consultation and object. It is unsound and there appears to be no properly funded transport plan as would be required.

In particular, I comment on my own village of Whitchurch, as follows:-

We do not agree with the suggestion of 1.000/2.500 houses at Whitchurch Village. This is not a sustainable site. It is not the most suitable site for such a huge development. Since the recent building of further houses we have been plagued with flooding and excessive water problems on the A37 which continues to get worst with every development you pass, this amount of housing would once and for all destroy the natural green belt that acts as a natural soak away, your local flood team has been called in already having to deal with problems at the latest horse world development so you can not consider Whitchurch where you already have such problems suitable, it would be madness, and you should be held responsible for not looking at the evidence provided by local people as you have been warned on numerous occasions in the past.

If you build this amount of houses in the suggested area you will destroy the village of Whitchurch once and for all. The population of such a development will turn this village into a town and that will change the whole dynamic of the village and the way of life in the village. It is never acceptable or sustainable to develop an area which has little employment, services and health care.

You suggest a new link road between the A37 and A4 and that a transport study is currently underway. Nothing should be decided until this study is completed because if you get the decision wrong you could be creating a road that will actually not alleviate traffic and HGVs from the A37 and could create a short cut for the A4 when that road is busy. Vehicles could use this proposed road and journey back into Bristol via the A37 effectively creating more traffic, congestion and dangerous air quality.

Your survey must establish from the transport companies that currently use the A37, why they use this road in order to fully understand a full origin and destination for the HGVs, the same should be done for non HGV traffic.

No one denies that we need to improve the road system, but until you bypass Temple Cloud, Pensford and Whitchurch, you will not solve the A37 problems and you should not build houses in this number until it is proved you can ease traffic.

There is a route that could be considered which would alleviate HGV traffic for both Pensford and Whitchurch and improve traffic flow and enable you to provide an effective park and ride system. You should seriously consider enlarging the Chelwood roundabout and build a new road or improve considerably the current road from the Chelwood roundabout to meet up with The Globe roundabout. You could then link/improve the road from Chelwood up to the airport on the A38. The airport is due to grow and we need a proper linked up vision. With a road from Chelwood to The Globe / A4 and from Chelwood to the airport A38. This gives you then the perfect place for a park and ride at Chelwood which could put on buses to the centre of Bristol. These buses could also pick up from Whitchurch and Pensford on the way into Bristol, so giving a regular service from a park and ride at Chelwood. New shuttle buses over to the Newbridge park and ride so Bath was also accessible, and of course they could run up to the airport so giving a proper joined up transport system.

Such a transport system is the only way you will encourage greater use of buses / public transport. Once such a system was in place and new link roads established, it would be possible to put a 10 tonne weight limit except for access, though Pensford and Whitchurch to avoid HGV traffic in these villages, particularly the problems on Pensford Hill. If the same weight restriction was also put at the Happy Landings, HGV traffic could not then travel south through these villages. In this way you would encourage less use of cars for commuters to Bath and Bristol and ease HGV traffic through villages that are unsuitable for it.

The aspiration of all the community living in Whitchurch is to keep it a village. Most villagers acknowledge we need some housing but what are required, small houses for first time buyers and downsizers, something we never get when new homes are built here. There are always homes available in this area over £275,000. Some have been on the market for over 6 months and have not sold, so this should show you that the larger houses are not what the market needs.

Your concept diagram for Whitchurch would destroy the village and its current community, as you would increase it beyond a village environment and turn it into a town. You even suggest creating a new local centre which would destroy the current village centre and damage the businesses in the current centre. It is not sustainable or morally right to destroy the village in this way. If you change the centre of the village, you will kill its current community and turn it into a dormitory town with a new centre with no history and looking like every other modern box built town.

Your proposed pictures clearly indicate the type of modern looking box homes that do nothing to create community. There are many places that you have just not considered which would be better to site this amount of housing e.g. Brislington / Hicks Gate. This area has many more sustainable qualities than Whitchurch. It is nearer to employment, train station, park and ride, Keynsham shops, better doctor's surgeries and a crown post office. To develop near all these services and infrastructure is much more sustainable.

None of these services and infrastructure are available in Whitchurch which is why it is currently unsustainable for such a development.

It should also be considered that Bristol plans to build 2,500 homes at the old Whitchurch airport site and this is so close to the village of Whitchurch that it will affect the A37 and will mean that doctors and services etc. currently used by Whitchurch villagers will be under extreme pressure. It is evident that all the villagers in Whitchurch having made clear in their neighbourhood plan that they wish to protect their village and its green belt. When there are other brown field sites elsewhere that could be developed to give the housing requirement you should develop these sites first. It is also unclear if the housing figures are even going to be correct due to Brexit and the slowdown in migration, the figures will no doubt need reassessing.

So many brown field sites that could be sustainable remain empty, such as the abandoned arena area next to Temple Meads and the old factory building at Midsomer Norton. I understand that BANES hope to create 1700 to 2000 new jobs at Somer Valley Enterprise Zone at Old Mills, and then you should consider increasing the housing near this so that work and homes are adjacent. You could easily provide another 1500 houses here which would less than double the houses in Somer Valley. Yet you consider it better to increase Whitchurch from 203 to 1803, madness not sustainability. If you build in Whitchurch, which has little employment, travel by car to work is inevitable. You really do need to start having some joined up thinking on developing business and placing housing to feed that supply of jobs.

Part of the heart of Whitchurch village is the school which creates community as villagers walk their children to school, passing the businesses in the village. If you intend to build new schools out of the centre, then there is a chance the current village school would become obsolete. This would be a disaster for the village. The only consolation would be if the current village school could be earmarked to be the village health centre, so keeping a centre focus for the village. I would not really like to see it change from a school but to ring fence it as a health centre would serve the village well. Rather than destroying large areas of green belt with 2,500 homes in Whitchurch, it might be better to consider much smaller developments in each village which could still provide your numbers, say

another 100 homes for Whitchurch considering that the village has already taken 250 houses in recent times, 100 for Pensford, 100 for Hinton Blewitt, 100 for Clutton, 100 for Temple Cloud, 100 Hallatrow, 100 Paulton, 100 Farrington Gurney, 100 Timsbury, 100 Compton Dando and the other 1500 in the Somer Valley ready to feed your new jobs at Old Mills.

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People living and working in Whitchurch Village have always overwhelmingly voted for the Green Belt to be retained. In paragraph 14 of the National Planning Policy Framework it clearly states that housing targets should not override constraints within the area. Our constraints are the Green Belt and flooding as mentioned previously. There are no exceptional circumstances to provide Bristol with an Urban Extension here. It has its own brown field land available to provide for further housing.

Problems to consider. Your extended position for the 2,500 houses on your concept diagram is in an area which has suffered from flooding and also is sited on limestone which has been known to have culverts and suffer from sink holes. Those who have lived here for generations have seen land shift and the A37 is always having problems with man holes and subsidence etc.

All around Whitchurch and Queen Charlton the area has been mined for limestone years ago; it is no coincidence that most of the old houses in this area are constructed from it. Hence you need to be very careful; this is not a suitable place for further development.

Yours sincerely

Susan Dean

From: Dean Organ Builders
Sent: 10 January 2018 11:35
To: Local Plan
Subject: Responding to the Local Plan - Issues & Options 2016-2036

Subject: We are responding to the Local Plan – Issues & Options 2016-2036

Dear Sirs

I object to the Local Plan. It is unsound. There is no Transport Plan. Allocation of 2.500 houses at Whitchurch Village is disproportionate to other places within BANES.

In particular, I comment on my own village of Whitchurch, as follows:-

We do not agree with the suggestion of 1.000/2.500 houses at Whitchurch Village. This is not a sustainable site.

As is evidenced by the flooding team having to deal with the current problem in Whitchurch at the Horse World Development, no more building en mass should be considered as it will only exaggerate the existing problems further. The agricultural green belt in Whitchurch must be safe guarded so to allow its valuable natural soak away, otherwise you risk further compounding of problems to the existing village homes. Evidence of the existing problems is confirmed by the local lead flooding authority have had to be brought in to deal with the issue. You have been informed many times before from local residents of the flooding issues. This is not an excuse to stop further building in Whitchurch it is a warning which must be taken seriously when considering your planned development within your JSP.

If you build this amount of houses in the suggested area you will destroy the village of Whitchurch once and for all. The population of such a development will turn this village into a town and that will change the whole dynamic of the village and the way of life in the village. It is never acceptable or sustainable to develop an area which has little employment, services and health care.

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All around Whitchurch and Queen Charlton the area has been mined for limestone years ago; it is no coincidence that most of the old houses in this area are constructed from it. Hence you need to be very careful; this is not a suitable place for further development.

Yours sincerely

Thomas Dean

**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	Mr & Mrs	Title	
First Name		First Name	Chris
Surname	Denner	Surname	Beaver
Job Title <i>(only if applicable)</i>		Job Title	Director
Organisation <i>(only if applicable)</i>		Organisation	PlanningSphere Ltd
Email	c/o Agent	Email	chris@planningsphere.co.uk
Address	[REDACTED]	Address	Coworking Bath
	[REDACTED]		The Guild, High Street
	[REDACTED]		Bath
Postcode	[REDACTED]	Postcode	BA1 5EB
Date		Date	8 th January 2018

Part 2:

Which question in the Issues & Options document are you commenting on? Q1, Q2, Q3.....

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 Mr & Mrs Denner who are is the freehold owner of land at 73 Bristol Road, Keynsham. We are instructed to comment on the Council's current round of consultation on its Issues and Options Local Plan Document.

Following the conclusion of this consultation it our intention to develop a technical evidence base to support a development plan allocation and revision to the Green Belt boundary around Keynsham.

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 and 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

Please note that names and comments will be published

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.”

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, that would further support the aspirations of the Housing White Paper in terms of accelerating 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 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 Keynsham for small scale sustainable development in what 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 to better reflect the settlements built up edge. These sites could be included 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 they would be attractive to SME builders who will provide for an important component of the housing supply.

Current Local Plan allocations for Housing in Keynsham are largely focused on a series of large sites which are currently in development or being built out by volume house builders. The North Keynsham Strategic allocation would provide significant further housing for Keynsham. However, given its size and the associated infrastructure needs, development of this site would most likely have a considerable lead-in time and will be phased over many years. There would also be very limited opportunities for SME developers to access plots on such a large site with high up front costs. In order to maintain a pipeline of delivery in Keynsham, in line with the aspirations of the Housing White Paper outlined above, we consider that the allocation of smaller non-strategic sites, including some Green Belt sites is necessary and should be provided for in the new Local Plan.

Our client’s site, listed as Site K37, in the current HELAA, is available and deliverable now and would make a modest contribution of circa 20-25 units, including the possibility of some custom or self-build plots, to meeting housing need and increase the variety of plots available to developers in line with government policy and the White Paper, as well as an element of affordable housing. Whilst currently located in Green Belt, development of the site would represent a logical rounding off of this part of Keynsham, and could also deliver highway safety betterment as part of the access proposals, which are currently under consideration. Furthermore, this is a highly sustainable site due to the existing excellent public transport links including bus links to Bristol and Bath, the walking proximity of the train station and the High Street and the cycle lanes provided at the frontage of the site. The release of this site from Green Belt land / provision for its development should therefore be reflected in the Core Strategy Review.

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

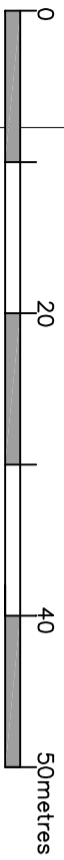
2.3 Are there any other comments you wish to make on the issues and options?

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



STOCKWOOD VALE

Hamleaze

Hamleaze Cottage

Boundary TBC

No 73

DRAFT FOR CLIENT APPROVAL

School access to playing fields

Existing Site Plan
Scale 1:500

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2015 Ordnance Survey 100035207



Warren Payne MRICS
Chartered Building Surveyor
e-mail: warren_payne@icloud.com
mobile: 07818 436 126

PROPERTY
73 Bristol Road
Keynsham. BS31 2WD

DRAWING TITLE
Site Plan

Note

Date 16 Feb 2017

Scale 1:500 @ A3

Drawing No

BD-02

FB

LB

71

Planning Policy
Bath and North East Somerset Council
Lewis House
Manvers Street
Bath
BA1 1JG

180108 B&NES Local Plan Reps DH

09 January 2018

Dear Sir or Madam

Bath and North East Somerset Local Plan 2016-2036 Issues and Options document Representations on behalf of Douglas Homes (Bristol) Ltd

I write on behalf of our client, Douglas Homes, to set out representations to the Bath and North East Somerset Local Plan 2016-2036 Issues and Options Document.

Spatial Strategy

The Joint Spatial Plan will set out the Housing requirement for Bath and North East Somerset. Much of the requirement will be delivered through existing commitments and Strategic Development Locations at Whitchurch and North East Keynsham. However, there is still a significant amount of development that will need to be delivered through new allocations.

The issues and options document provides 3 options for the approach to the spatial strategy. Options 1 and 2 are very similar and represent the most sustainable approach of directing the majority of development to the most sustainable locations. The Joint Spatial Plan notes that there is limited opportunity for further development around Bath, so the other larger settlements, particularly Keynsham, represent the most appropriate locations in which to focus growth.

Keynsham is constrained by the Green Belt. However, as an otherwise sustainable location, the Council should not dismiss locations solely on the basis of their location within the Green Belt. The Council should be reviewing the Green Belt around Keynsham and consider which sites offer opportunities for sustainable growth, and potentially offer other benefits. The Green Belt around Keynsham should be considered before sites are considered which are in less sustainable locations.

Site at Durley Lane, Keynsham

Douglas Homes have previously promoted their site at Durley Lane, Keynsham through the Joint Spatial Plan and Call for sites process. The land comprises sites K56, K57 and K58 in the Housing and Economic Land Availability Assessment (HELAA). The site is located within the Green Belt, but it is closely related to Keynsham and includes a large area of brownfield land which would be suitable and available for redevelopment for housing now. The redevelopment of this area could enable landscape and ecological improvement alongside the River Avon, with potentially the creation of a riverside parkland which could link in with "The Chocolate Quarter" and proposed North East Keynsham Strategic Allocation.

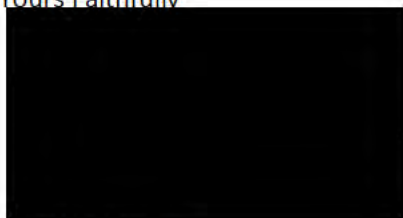
The site is located alongside the Hicks Gate Roundabout, so is well located on a strategic transport link between Bath and Bristol and represents an opportunity to facilitate further improvements to this part of the strategic



transports network. Part of the site offers a suitable location to provide a Park and Ride, in a location indicated on the Joint Spatial Plan Key Diagram (Diagram 4 Page 8 of the Issues and Options Document), which could be facilitated by additional, complementary, commercial development.

I would be grateful for confirmation of receipt of this letter. Douglas Homes would welcome the opportunity to discuss the redevelopment of the Durley Lane site further with officers, but in the meantime, if you have any questions, please do not hesitate to contact me.

Yours Faithfully



Dan Washington
Director



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ISO 14001:2015
OHSAS 18001:2007

Directors: **Matthew Bollen** BA(Hons) Dip Arch RIBA · **Sally Hewins** MCIAT · **Dan Washington** BA(Hons) MTP MA (Urban Design) MRTPI
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BBA ARCHITECTS LTD registered office address: Henrietta Mews Bath BA2 6LR · Registered in England No 02679820 · Constructionline Reference No: 9412

From: Clive Dunn
Sent: 08 January 2018 13:51
To: Local Plan
Subject: Comments

Why is greater use not being made of the river Avon to move people between Bristol & Bath?

It takes pressure of the A4.

It is more carbon effective (like buses)

You are building a foot/cycle path feeder network.

It will encourage use of the riverbank with get on get off.

Look at Brass Knocker Bottom (Bath), which is a raging success.....

Clive Dunn