

**From:** Richard Gapper  
**Sent:** 08 January 2018 19:42  
**To:** Local Plan  
**Subject:** Local Plan - Issues & Options 2016-2036

### **Local Plan – Issues & Options 2016-2036**

I object to the local plan for the proposal of 1500-2500 houses and object to the proposal of the link road.

People living and working in Whitchurch Village have 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. Also the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. Local planning authorities should regard the construction of new buildings as inappropriate in Green Belt.

The infrastructure is limited, poor road links, no shops, little employment, no post office, doctors, and bank. Bus services are poor and not directed to areas of employment. Whitchurch Village has already been built on significantly.

Long Ashton was rejected because locals 'valued their green belt'. Were we ignored?

Bristol has brownfield sites at the now abandoned Area at Templemeads and at the old Lloyds Bank and Norwich Union Building. These should be used for Bristol's housing needs, perfect for employment. People can live and work in the city and so reduce car use, pollution, and provide a sustainable and enjoyable location.

With regards to the link Road, The South Bristol Ring road phase 3 (Keynsham to Whitchurch) was dropped after public objection so the South Bristol road (supposed to be a dual carriageway) became the South Bristol Link Road (Single carriage way). This would indicate that we were listened to. Just because the name has change doesn't mean people's views have changed. It was objected and should not even be proposed again.

B&NES proposal is unclear and not a suitable location for a link road. The diagram is unclear where the road ends as there is a grey box covering this area but it looks like it will come out onto Stoneberry Road as this is the only opening for it. The proposed road would cut through farmers' fields so cattle would not be able to roam. It would cut through adjoining fields to Lyons Court Farm which is dated 13<sup>th</sup> century and is the second oldest surviving building in Whitchurch. To suggest putting a link road in the adjoining fields would have impact on this building. Quoted from [bathnes.gov.uk](http://bathnes.gov.uk) link on the site **"Development around Whitchurch Village near Lyons Court Farm and land below Maes Knoll and Wansdyke would impact on the significance of these heritage assets. They are of national importance as scheduled monuments." What's changed?**

It would also be very close to residential houses so noise/air pollution levels would be dreadful. If the proposed road does come out onto Stoneberry Road, it's a 20mph zone and there is a Primary School on this road. The pavement has been slightly widened for the children to come out as the pavements are very small meaning the road is narrower at this point. The road is congested with parked cars at school times. This would become a rat run and a potentially a dangerous road. (Assumption as again unclear) from Stoneberry Road you would then head onto Whitchurch Lane

which is also a 20mph zone at points and has speed bumps. This road is already congested and houses are very close to the road. Noise and air pollution levels would be alarming. Also with this route artic Lorries would not be able to use this road.

The roads are congested. The suggested link road will only increase traffic movement through the village and also through our neighbouring village of Pensford.

Conclusion: Whitchurch has no suitable place for a Ring/Link Road to run through it. With no infrastructure for a new road, 1500-2500 houses cannot be built in Whitchurch Village.

Leave the Village as a Village, leave our Green Belt to be enjoyed by agriculture, adults, children, dog walkers and most importantly nature and a village open space.

Hope we are listened to.

Regards,

Richard Gapper

# **Gladman Developments Ltd**

Representations on the  
Bath and North East Somerset Local Plan 2016-2036  
Issues and Options

January 2018





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# 1 INTRODUCTION

## 1.1 Context

1.1.1 Gladman Developments specialise in the promotion of strategic land for residential development with associated community infrastructure. This submission provides Gladman Developments' representations on the Bath and North East Somerset Local Plan 2016-2036 Issues and Options.

1.1.2 GDL has considerable experience in the development industry in a number of sectors including residential and employment development. From that experience, it understands the need for the planning system to provide local communities with the homes and jobs that they need to ensure that they have access to a decent home and employment opportunities.

1.1.3 GDL also has a wealth of experience in contributing to the Development Plan preparation process, having made representations on numerous local planning documents throughout the UK and having participated in many local plan public examinations. It is on the basis of that experience that the comments are made in this representation.

1.1.4 The National Planning Policy Framework sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

- **Positively Prepared** – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
  - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
  - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
  - **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.
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## 2 LEGAL COMPLIANCE

### 2.1 Duty to Cooperate

- 2.1.1 The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2012 Coventry Core Strategy Examination and the 2013 Mid Sussex Core Strategy Examination, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.
- 2.1.2 Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration<sup>1</sup>, as set out in the PPG it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard, Bath and North East Somerset must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross-boundary strategic issues, and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation.
- 2.1.3 Further, the PPG reflects on the public bodies which are subject to the duty to cooperate. It contains a list of the prescribed bodies. The PPG then goes on to state that:

**“These bodies play a key role in delivering local aspirations, and cooperation between them and local planning authorities is vital to make Local Plans as effective as possible on strategic cross boundary matters.”**

### 2.2 Sustainability Appraisal

- 2.2.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan’s preparation, assessing the effects of the Local Plan’s proposals on sustainable development when judged against reasonable alternatives.
- 2.2.2 The Bath and North East Somerset Local Plan 2016-2036 should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be

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<sup>1</sup> PPG Reference ID. 9-011-2014036

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clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Bath and North East Somerset Plan's decision making and scoring should be robust, justified and transparent.

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## **3 WEST OF ENGLAND JOINT SPATIAL PLAN**

### **3.1 Overview of Representations made to the West of England Plan Publication Version**

- 3.1.1 Gladman Development have been involved in the preparation of the West of England Joint Spatial Plan (JSP) and has submitted detailed representations to the Publication Version of the Plan.
- 3.1.2 We welcome the preparation of the strategic plan for the West of England and are pleased that the four constituent authorities are committed to working jointly together in a positive and strategic plan led approach. However, Gladman consider that the JSP, as it is currently drafted, is unsound for a number of reasons which are set out below.
- 3.1.3 The JSP does not make adequate provision to deliver the full overall housing need for the West of England; a view shared by a consortium of developers including Gladman Developments. The actual level of housing need that the West of England Plan should seek to deliver, based upon an NPPF compliant assessment of housing need prepared by Barton Willmore, is circa 140,000 dwellings. There is therefore a considerable shortfall in the housing provision set out in the JSP.
- 3.1.4 The JSP does not seek to provide sufficient flexibility in the housing supply to cater for slippage in the delivery of sites. Currently, the JSP provides 3% flexibility in housing supply, whereas Gladman consider that 20% flexibility would provide a more appropriate response to this issue. This would provide greater certainty that the housing requirement set out in the JSP can be achieved or surpassed.
- 3.1.5 The JSP is over-reliant on strategic scale housing sites to deliver the housing needs of the area. Strategic sites are typically complex, difficult to bring forward and take a considerable amount of time before housing units on the sites are actually delivered. This leaves the potential for a gap in the housing supply in the short term which needs to be addressed through the constituent authorities' Local Plans. A range of smaller scale residential sites should therefore be identified in the 4 authorities' Local Plans that will deliver in the short term (i.e. the first five years of the plan) to ensure a continuity of supply and to maintain a 5-year housing land supply.
- 3.1.6 Whilst the focus on Bristol, Bath and Weston-super-Mare is understandable, this must not be at the detriment of providing housing for the needs of the local population in the smaller settlements and rural areas. This needs to be addressed through the constituent authorities' Local Plans with new housing allocations on a wide variety of sites, across numerous locations, in line with Paragraph 55 of the Framework.
- 3.1.7 The JSP also does not seem to have selected sites for release from the Green Belt which follow the evidence base and which minimise impact on the Green Belt. Sites appear to have been allocated which make a significant contribution to the Green Belt, whereas others have been rejected despite
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being well located close to the major focusses of growth and which make only a limited contribution to Green Belt functions.

- 3.1.8 Gladman also consider that there is a lack of evidence that Bristol can achieve the level of development proposed in the JSP within its own boundaries. Bristol has failed to achieve these levels of development in the past and there is little in the evidence base to give confidence that these increased levels of development in Bristol can be achieved in the future.
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## **4 BATH AND NORTH EAST SOMERSET LOCAL PLAN 2016-2036 – ISSUES AND OPTIONS**

### **4.1 Overview**

- 4.1.1 The Bath and North East Somerset Local Plan 2016-2036 (BANESLP) will need to follow the outcome of the JSP closely and will need to deliver the strategy set out in the Spatial Plan as well as setting a local context including local housing and employment allocations. The Plan will need to ensure that it allocates sufficient sites so that the full housing needs of the JSP can be delivered.
- 4.1.2 As set out above in Section 3, the sites that the BANESLP allocates need to provide the house building industry and prospective house purchasers with a choice of size and locations to ensure that local housing needs are met and that a 5-year housing land supply can be maintained. A reliance on the strategic sites in isolation will inevitably result in delivery falling behind the required rate.
- 4.1.3 The strategic sites identified in the JSP must be thoroughly tested to ensure that they are deliverable, viable and are located in areas which are, or can be made sustainable. This will need to be rigorously tested through both the JSP and the Local Plan preparation to ensure that sites are actually deliverable and are compliant with Paragraphs 173 and 174 of the Framework.
- 4.1.4 The JSP and BANESLP also need to make certain that the lead-in times and delivery rates on the strategic sites are robust and realistic to ensure that housing supply from these sites comes forward as predicted by the housing trajectory. If not, this may lead to a gap in the housing supply, particularly in the early years of the Plan. Therefore, the BANESLP will have to build in sufficient flexibility, through the site allocations and associated policies, to fill the gap.
- 4.1.5 If any of the strategic sites set out in the JSP are ultimately found to be unsound, then there may be additional sites which need to be found, either of a strategic nature or potentially smaller sites, as replacements. The BANESLP will therefore have to closely monitor the progress of the JSP and react swiftly to any changes that occur.
- 4.1.6 Ultimately, the BANESLP will have to fully reflect the strategic direction of the JSP whilst ensuring that it is a deliverable plan which is suitable for providing for the needs of the local population with sufficient housing sites in the smaller settlements to meet local need.

### **4.2 Strategic Development Locations**

- 4.2.1 As set out in our representations to the West of England Plan Publication Document, Gladman consider that the Strategic Development Locations highlighted in the Plan do not seem to follow the evidence base as the most appropriate and sustainable locations for growth.
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- 4.2.2 Gladman welcome the realisation that Green Belt release will be required to deliver a sustainable strategy for the West of England and supports the rational that exceptional circumstances exist to make changes to existing Green Belt boundaries.
- 4.2.3 When specifically considering the Strategic Development Locations which require Green Belt release, Gladman question whether the Plan has been positively prepared and is justified given the available evidence suggesting more appropriate Green Belt options, which would impact less on the integrity of the Green Belt, above the chosen spatial strategy.
- 4.2.4 To support this point, it is interesting to note that sites such as Whitchurch have been chosen as part of this limited Green Belt release, when the Green Belt Study identifies the area as making a significant contribution to the Green Belt with *"All the cells adjacent to the large built up area of Bristol and surrounding Whitchurch village are assessed as making a major contribution to Green Belt purposes"*. Whereas on the other hand, sites, such as Land West of High Ridge have been overlooked despite being in an extremely sustainable location in terms of future growth/transport infrastructure and considered by the JSP evidence to have only a limited contribution to the Green Belt.
- 4.2.5 Whilst the land to the west of High Ridge once played a role in checking unrestricted sprawl, the newly constructed South Bristol Link Road has created "a more defensible boundary" closer to the urban area. This has resulted in this land now being disconnected from the wider countryside and therefore suitable for release. Gladman consider that the development potential of Green Belt cells such as these should have been further explored, alongside other similar sustainable locations, through the spatial strategy given their limited contribution.
- 4.2.6 It is considered almost indefensible to proceed with a Green Belt release of a cell that is significantly important to the integrity of the Green Belt, before releasing suitable, available and deliverable sites that serve a more limited Green Belt function. A wide-ranging portfolio of sites, including locations such as land at High Ridge for example, would also aid in providing a contingency against delays in delivery of other larger SDL's and would help to maximise housing delivery to ensure that the JSP is positively prepared, justified and effective.

### 4.3 **Vision and Spatial Priorities**

- 4.3.1 Gladman support the changes proposed to the Vision as set out in Paragraph 2.02 of the Issues and Option (I&O) Consultation and in particular, the focus on promoting economic growth, diversity and resilience, as well as delivering new housing. It should be recognised that in order to ensure that this Vision is realised, sufficient housing needs to be provided to deliver the full identified need across the Plan period to ensure a ready supply of workforce to satisfy the growth in jobs.
- 4.3.2 It is agreed that the Spatial Priorities for BANES need to reflect those set out in the West of England Joint Spatial Plan (JSP) as set out in Section 3 above.
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- 4.3.3 The I & O Consultation recognises housing affordability and lack of social housing as critical issues which must be addressed through the JSP and the BANESLP. In order to address this critical issue, it is essential that everything possible is done by both Plans to deliver sufficient housing to maximise the provision of affordable housing.
- 4.3.4 Whilst supporting the Spatial Priorities in general, Gladman object to Spatial Priority 2 in that it seeks to prioritise the optimal use of brownfield sites. The prioritisation of brownfield sites runs contrary to Government guidance set out in the Framework at paragraph 111, which merely seeks to encourage the re-use of previously developed sites. Spatial Priority 2 therefore goes further than Government guidance and should be reworded to simply encourage the optimal use of brownfield land.
- 4.3.5 Gladman support Spatial Priority 4 to plan for the delivery of sufficient new housing to meet evidenced needs and to support economic development. However, Gladman suggest that as housing affordability is highlighted as a critical issue for the Local Plan, Spatial Priority 4 should be expanded to state that the Plan should seek to provide sufficient housing to tackle housing affordability.

## **4.4 Spatial Strategy Options**

- 4.4.1 Gladman consider that of the Options set out in the I & O document, Option 1 offers the best spatial strategy for the BANESLP to pursue. It would offer the potential for the widest possible range of sites to be identified, in a variety of locations, to meet the housing needs of the local population.
- 4.4.2 Paragraph 55 of the Framework seeks to promote sustainable development in rural areas to maintain and enhance rural vitality and viability. It is essential therefore, that the needs of the sustainable rural settlements across the district are assessed and meaningful growth apportioned to them to ensure their ongoing vitality and viability.
- 4.4.3 It is considered that development should principally be directed towards those settlements which sit outside of the Green Belt to the south of the district, with the exception of the Strategic Development Locations identified in the JSP. Although the I & O document highlights an educational constraint in many of these settlements, given the lack of options available for housing growth outside of the Green Belt, the Local Plan must assess in detail, how to overcome such issues. Otherwise, many of these sustainable settlements will be left with no future housing growth which may cause issues for the on-going vitality and viability of services and facilities and will leave the housing needs of the local population unmet.
- 4.4.4 Each of the settlements which contain a moderate range of services and facilities or greater and are located outside of the Green Belt should therefore seek to deliver a meaningful level of new
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housing growth to ensure the affordable and market housing needs of the local population are met. This therefore should form the basis of the Council's Spatial Strategy in the BANESLP 2016-2036.

- 4.4.5 As highlighted above in Section 3, Gladman consider that the JSP is over-reliant on strategic scale housing sites to deliver the housing needs of the area. Strategic sites are typically complex, difficult to bring forward and take a considerable amount of time before housing units on the sites are actually delivered. This leaves the potential for a gap in the housing supply in the short term which needs to be addressed through the BANESLP. A range of smaller scale residential sites should therefore be identified in the BANESLP that will deliver in the short term (i.e. the first five years of the plan) to ensure a continuity of supply and to maintain a 5-year housing land supply.
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**From:** Helen James [mailto:Helen.James@gleeds.co.uk]  
**Sent:** 21 December 2017 14:50  
**To:** Local Plan  
**Cc:** Charles Gerrish (Cllr);  
**Subject:** Comments on Local Plan 2016-2036 Issues & Options document

Good afternoon

Please see below for my comments on the Local Plan 2016 -2036:

I believe Options 1 and 2 would be most viable from a personal perspective but mainly from a sustainable and business perspective. Would it be possible to mix the two option? That way smaller areas could grow without the already larger areas becoming too large and such requiring significant infrastructure upgrades.

I do not feel that a dispersed option would be viable.

Section 4 –

I strongly agree with the vision, however, I have a few comments on this.

There is reference to the A4 as an infrastructure connection. From Keynsham toward Bath or Bristol generally at any time of the day there is heavy traffic on these roads. Significant infrastructure away from the A4 is required to improve transport and sustainable transport links to Bath and Bristol. There is mention of upgrades to the train station however, there I believe the key issue is the frequency and reliability of the trains added to that the facility to purchase tickets either at Keynsham or more facilities in Bristol Temple Meads or Bath Spa stations to buy tickets there. Many times have I had to wait for some time in a queue to purchase a ticket at these stations, this then detracts from the reliability of the transport as there is a delay in the journey all be it at the other end. I have also noticed that there is a significant reduction in the bus service into Bristol, this is with reference to the No. 39 service. If there are reductions now, my question how can a sustainable transport system be funded to manage with an increase in the number of people to the areas? From a business perspective, new businesses in these areas need reliable, efficient and frequent transport to be able to connect to the surrounding areas and to other cities across the country. Without this the Bristol and Bath area is not a desirable places for new business.

Safety and security is also an issue that I have noticed since the Taylor Wimpey homes to the south of Keynsham have been occupied. We are aware that crime has increased. The Option that is implements needs to create a safe, comfortable environment for all ages, not just the young and the elderly. There is a lack of activity for teenagers to do and the new council offices development has created an area to hang around. This at times becomes intimidating when trying to access Sainsbury's and will deter people from using the local shops. If Keynsham is to grow this needs to be carefully considered.

Any development needs to create safe open grassed areas and get buy in from the environmental/wildlife initiatives that are already set up in Keynsham. Developments will need to be sensitive to the environment but also consider the history to the local area. Promotion of the Keynsham music festival and other events will be essential to maintain and build-on the existing community spirit.

Section 5.

I have similar comments with regard to transport links and safety to the area. This area would almost need to develop as a standalone village town which will require more amenities to avoid people driving into Keynsham / Whitchurch or Bristol for food and going out in the evening.

Finally I do welcome the opportunity to comment on the options. It is good to hear that BANES is carefully considering its options in addressing the housing and other issues. I would welcome any further information on how this develops.

I look forward to hearing from you

Merry Christmas & A Happy 2018!

Kind regards

**Helen James | Senior Project Manager | Gleeds Management Services Ltd**  
**T: +44 (0)117 317 3200 | M: + 44 (0)7973903022 | F: +44 (0)117 317 3399**  
1400 Bristol Parkway North, Newbrick Road, Bristol. BS34 8YU  
[Helen.James@gleeds.co.uk](mailto:Helen.James@gleeds.co.uk)



# 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](http://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](mailto:local_plan2@bathnes.gov.uk). Alternatively you can post the form to Planning Policy, Bath & North East Somerset Council, PO Box 5006, 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	MRS	Title	MR
First Name	JUDI	First Name	ROGER
Surname	GRANT	Surname	BUSBY
Job Title <i>(only if applicable)</i>		Job Title	
Organisation <i>(only if applicable)</i>		Organisation	
Email		Email	
Address		Address	
Postcode		Postcode	
Date	07. 01. 2018	Date	07/01/2018

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.

10a. We need the best possible architectural practice, lateral thinking, <sup>innovative</sup> ~~innovative~~ design, use of new materials and efficient insulation, energy saving and creative ideas to produce a new accepted standard of excellence for those who need this most i.e. first homes buyers and people who have no choice but to rent.

High density and economy is possible if each householder has a compact private space but shared communal open spaces. Care must be taken to ensure that such spaces are serving only the surrounding houses, not the general public\*. This would engender community spirit, natural gatherings and a sense of possession and pride whilst saving the usual inadequately narrow access roads with useless grass verges leading along endless rows of cheaply built tiny box-like dwellings. These are more often than not pathetically undersized for family needs leading to friction within and without. We can and should do better!

Schemes should be exciting, well designed meeting the highest possible standards and not lead by out of date, money oriented developers.

Housing units could also be far more adaptable. Holland builds homes with wide doorways throughout. Ceilings have load bearing concealed beams in appropriate places ready to take hoists or disablement adaptations if required. Interior walls could also be moved or adjointed to meet changing needs if incorporated in the initial planning. Bigger family homes could be designed to be subdivided and reconfigured once children have left home and elderly parents need care.

\* Children should regain the opportunity for safe play and interacting with others whilst easily overseen by their carers. All ages need more opportunity for outdoor socialising. Getting to know, and in the case of children, being known within the community, fosters better social skills and behaviour

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?

I suggest that as far as possible, houses should be positioned to the best possible advantage for energy efficiency. Devices such as solar panels should be an integral part of a roof, not an add-on, so that there is uniformity in the appearance of a housing scheme.

Perhaps there could be serious exploration and exploitation of integral energy systems where possible for smaller individual developments.

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](http://www.bathnes.gov.uk/localplan)

**From:** mark.osullivan

**Sent:** 10 January 2018 20:11

**To:** Planning Policy

**Subject:** Consultation on Issues and Options for the Local Plan: response by the Greenway Lane Area Residents' Forum, Bath

Dear Sirs

### **Representation on behalf of the Greenway Lane Area Residents' Forum, Bath**

1 The Greenway Lane Area Residents' Forum is a residents' association within the City of Bath, representing residents in an area roughly bounded by Entry Hill, Wellsway, Poets' Corner, Alexandra Park, Lyncombe Hill and the Foxhill/Mulberry Park estates. It is a member of the Federation of Bath Residents' Associations, and its membership area overlaps with those of the Widcombe Association and the Bear Flat Association. It is within the City of Bath Conservation Area and the City of Bath World Heritage Site, and in part within the Cotswolds Area of Outstanding Natural Beauty.

2 We believe that the Local Plan Issues and Options Consultation Document as it stands is unsatisfactory on the following grounds:

- The calculated housing requirements are faulty in the following respects: they take insufficient account of the potential for commuting from Wales (especially following the planned abolition of tolls on the Severn Bridge in December 2018) and from Wiltshire; they fail to question the use of DWP data as a proxy for housing affordability, and take insufficient account of the distinction between affordable housing and social housing; they take insufficient account of the congestion and air pollution impact of existing and already proposed housing development; they take insufficient account of housing mix, and in particular of the difficulty which local planning authorities evidently experience in their development control function in insisting on housing meeting the growing requirement for small rather than larger households; they take insufficient account of the need to provide in significant new developments for local infrastructure, especially social infrastructure. We think that the overall figures could be reduced, especially given the dominance of protected landscapes in B&NES, but if driven to choose between the three housing options on pages 11 and 12 of the document we would opt for Options 1 or 2, provided that additional development in the city of Bath itself was not approved.
- The economy-focused policies are faulty in underplaying the vital economic and employment importance to the West of England of tourism (both domestic and from overseas), and in particular the very significant impact on local tourism of the conservation and enhancement of the natural and cultural heritage, not only in protected areas such as the World Heritage Site, the AONBs, the Conservation Areas, listed buildings and monuments, and the settings of these, but more widely in areas of note, especially at skylines, and in the open countryside.

3 We support:

- The "critical issue" *Considerable recent & projected student population growth*. In this context we suggest that the Plan should look to distribute students through the city and its environs and prevent the development of "student ghettos"; having regard to the journey length of students at many London universities it might not be impossible for some halls of residence to be located at some distance from Bath.
- The "critical issue" *High quality natural, built & historic environment requiring protection and enhancement*. In this context we suggest that the Plan should by reference

incorporate into the Development Plan the relevant Landscape Strategies and Guidelines developed and approved for the Cotswolds AONB by the Cotswolds Conservation Board, and the Management Plan developed and approved for the Mendip Hills AONB by the Mendip Hills AONB Partnership and its five local authorities.

- The “critical issue” *Threat to environment & need for and maintenance of additional green infrastructure arising from development & other pressures* (page 6). We note that much new development within the city of Bath in recent years has paid insufficient attention to green infrastructure (for example, the extensive area of barren paving at the corner of Lyncombe Hill and Claverton Street, which is very suitable for laying out largely as greensward or shrubs). We would argue that there are strong arguments for green infrastructure to be prompted and supported at community level if it is to be put to fullest use for maximum benefit, and in this context we note that, when the Core Strategy was under consideration, we submitted a fully reasoned and documented proposal for an NPPF Local Green Space in the area between Greenway Lane and Devonshire Buildings, which was summarily rejected by the Council on the arbitrary grounds that the land was in educational use; we ask that this proposal now be reconsidered and approved as part of the current Local Plan process.
- The “critical issues” listed under Transport and Infrastructure. To this end we urge a strong focus on reducing the impact of non-electric vehicles in Bath, especially in terms of congestion and air pollution. A strong transport policy for the city commanding wide support is essential, including an Eastern Park and Ride (possibly in Wiltshire). Opportunities to relieve traffic between Bath and M4 J18 should be reconsidered, perhaps including a new Junction 18A under the Cotswold escarpment, and a new park & ride or park & share service at the disused South Gloucestershire car park at J18.

Best wishes

Mark O'Sullivan  
Planning Policy Officer, Greenway Lane Area Residents' Forum

**From:** Tony Griffin  
**Sent:** 28 December 2017 16:50  
**To:** comment@jointplanningwofe.org.uk  
**Cc:** Planning Policy  
**Subject:** OBJECTION TO LARGE SCALE DEVELOPMENT AT WHITCHURCH - Response

I agree that there is a housing shortage.

However, there is a need for selected sites to be sustainable & with the appropriate infrastructure (doctors, dentists, shops, schools, community buildings, sensible roads where air quality is good, & where for local people are able to walk safely) WHITCHURCH VILLAGE DOES NOT & CANNOT TICK THESE BOXES

I am objecting to the suggested large scale development for the following reasons:

1. Whitchurch Village is **NOT a sustainable location** for the large scale development suggested @c 2500 number. If this number of houses are built then Whitchurch will become an urbanisation of Bristol & lose the identity it has built over many hundreds of years.
2. The JSP is supposed to be addressing housing & transport issues jointly with a plan to take us to 2036. **There is no evidence to suggest the Transport plan is either joined up to the Housing plan**, or indeed even taking shape in any robust way.....how on earth can local residents be expected to comment with any reasonable intelligence without a seeing a joined up plan. The Transport studies are not yet in a position to allow local people to comment.....or, I would suggest, the unitary authorities to continue the housing plan?????
3. There is already massive traffic & parking problems in this area. Where will this suggested ring road be going??.....Indeed, the BANES transport officer has advised us that '**building a ring road will not improve the situation, it will just not make things worse**'. Is this a good reason to spend millions of pounds of public money (at the same time eroding Green Belt) in this current era of 'austerity'? This would be a public scandal.
4. **There is NO justification to build a hugely costly link road that will not improve the flow of traffic.** The A37 is not regarded by Highways England as a strategic route.....Little scope for commercial / economic development?. There are pinch points throughout the road, which has had an horrific history of death toll. HGV's / lorries cause chaos in Pensford village because they cannot pass each other. Surely an orbital road, linking the motorways & Bristol Airport would provide a much more effective & sustainable longer term solution?
5. There are **NO exceptional circumstances to justify erosion of the Green belt** at this scale.
6. **This area already has significant surface flooding**, with a number of unidentified watercourses & springs. There are already problems at the current 'Horseworld' site causing flooding to neighbouring properties. Sleep Lane appears to be under water when we have significant rainfall.....since the Barrett development was built. Local fields near Woolard Lane are flooded often. A housing development in the numbers suggested would bring a **watery chaos**
7. There is virtually NO employment in Whitchurch Village, People who will come & live here will simply **add to the existing commuter chaos we see on a daily basis.**

8. I provide an **exact quote** from The Chancellor's Autumn Budget, which would appear to undermine the JSP proposal to build on green belt & reinforce a need to use existing brown field:

**“We will focus on the urban areas where people want to live and where most jobs are created. Making best use of our urban land, and continuing the strong protection of our green belt. In particular, building high quality, high density homes in city centres and around transport hubs**

9. The **housing targets could be reached by smaller scale developments more evenly spread out**.....thus allowing integration into existing settlements where facilities already exist. Stronger communities will be fostered. Devastation of the green belt will be avoided.
10. Our local MP – **Jacob Rees-Mogg** in his letter to the Village Council (dated 18 Dec 2017). ....states clearly that **he is in support of our view that the green belt must be protected.**

The Whitchurch Village Council has made its position quite clear . The democratically adopted Neighbourhood Plan (by 97% of Village residents) has been formally accepted is also quite clear. Whitchurch Village **MUST** retain its current identity & green belt must be protected.

We live in a democratic country - Please listen to the voice of the people of Whitchurch.

**Tony & Tina Griffin**  
**Residents of Whitchurch Village**

**From:** Geoff Griffiths  
**Sent:** 10 January 2018 21:00  
**To:** Local Plan  
**Subject:** Local Plan 2016 to 2036

Comments on the Plan as follows:

The Green Belt must be retained. Once it's gone, it's gone and will not be reinstated. There appears to be some backtracking on this point of principle in the plan and this must be resisted.

Much is made of the transport issues. but where is the reference to a revived station in Saltford? This is one community (unlike many others in BANES) that can access an existing transport link. See below.

The proposed development in North Keynsham as well as threatening the Green Belt is bound to put more pressure on the A4. How is this to be managed? The main problem here is the Bath-Bristol axis which will only be truly relieved by a Bath By-pass from Hicks Gate to the SW of Bath. Anything else is just playing about at the margins. Not only will the journeys between the two cities become more congested and, subject to a mass conversion to electric vehicles, will increase air pollution. It will also not help to attract businesses to the area.

There is too much reliance on the public using bicycles and walkways. The Plan seems to be built around fitness-seeking younger people whereas the demographics suggest a large increase in the elderly who will not/can not make use of such a facility.

The importance of retaining farmland is understated. In line with improving the environment support for more locally grown food should be at the forefront of thinking especially if the plan sees a increase in the housing stock - and therefore people - in the next twenty years.

In summary the Plan contains a number of inconsistencies e.g preservation of the Green belt v Development on the such land may be allowed and increased pressure on transport links v absence of schemes to manage this.

G Griffiths

8 January 2018

Local Plan Consultation,  
Planning Policy  
Bath and North East Somerset Council,  
Lewis House,  
Manvers Street  
Bath  
BA1 1JG

Dear Sir/Madam

I am a resident and Parish Councillor in Pensford, which is a "conservation village", washed over by the greenbelt and I am concerned about the effect these plans will have on our local environment.

My main objection is that these proposals will add to the volume of traffic which already passes through Pensford on the A37.

Pensford village already suffers from noise, pollution and terrible disruption due to high volumes of commercial traffic passing through the village on our substandard portion of the A37.

There have been meetings between residents of Pensford and Kelvin Packer, Head of Transport to discuss the **existing** traffic problems.

These new proposals can only lead to a worsening of the already seriously unsatisfactory situation. It is self-evident that locating a further 1000/2500 houses, schools and commercial facilities in Whitchurch Village will further add to the already unacceptable road demands in Pensford.

There is no suggestion of a by-pass through Pensford. This was considered in the past, with the level of traffic existing at the time, but was rejected on cost grounds.

The proposed Park and Ride at Whitchurch will attract large volumes of commuter traffic which will once again add to the amount of traffic and pollution.

The transport link to the A4 will also generate more traffic on the A37 and the potential expansion of Bristol airport will add further to the increase of traffic on our rural roads as the vehicles pass through on the way to the motorways.

Recently, the A37 Pensford has been frequently closed due to HGV's breaking down or articulated vehicles and other large vehicles being unable to pass each other on the narrow Pensford Hill. There are also frequent accidents and many incidents of vehicles going on to the pavement or knocking over bollards which is extremely dangerous for pedestrians.

You say that one of the Councils corporate priorities is 'to manage congestion through the location and form of development' These proposals clearly go against these priorities as they will add to the existing traffic problems in Pensford.

The planned urban extension is purely to provide housing for Bristol. It is inappropriate for our small rural Somerset community to suffer a vast increase in traffic noise, pollution, hazard and disturbance



simply to accommodate Bristol's workers or shoppers and to allow more and more out-of-area commercial traffic to use our village as a shortcut to the motorways. You say that one of your 'priorities is to utilise brownfield sites'. Bristol itself can provide such brownfield sites, with shorter journey times and better access.

You say that 'options to avoid the green belt must be considered first' but all these proposals are in Green Belt land in Whitchurch Village.

In summary, my main objection to these proposals is that they do not sufficiently consider the serious impact on the A37 running through the small rural community of Pensford. A vast increase in traffic would flow from these developments and this would be unsustainable without first building a Pensford by-pass to take the resulting traffic (especially HGV traffic) away from Pensford Hill and the village centre and school. The situation is already unacceptable and Bath & North East Somerset council is finding it difficult to come up with any acceptable solutions. I note that there is currently no Joint Transport Plan and I ask that this Joint Transport Plan properly considers the impact these proposals will have on the residents of Pensford.

Yours sincerely

CLlr Sue Grimes, Publow with Pensford Parish Council



7<sup>th</sup> January 2018

West of England Joint Spatial Plan  
c/o South Gloucestershire Council Planning  
PO BOX 1954  
Bristol  
BS37 0DD

Dear Sir/Madam

I am responding to the Joint Spatial Plan consultation and wish to register my objections.

I am a resident and Parish Councillor in Pensford, which is a “conservation village”, washed over by the greenbelt and I am concerned about the effect these plans will have on our local environment.

There is already a high volume of heavy traffic passing through Pensford village, which already suffers from noise, pollution and terrible disruption due to high volumes of commercial traffic passing through the village on our substandard portion of the A37.

Traffic levels are already excessively high in both directions. In particular, Pensford Hill, (the narrow main road through the village), blocks on a regular basis and is a potential danger to pedestrians. The village centre and school also suffer from these hazards.

Traffic moving down Pensford Hill on the A37 through Pensford.



The existing traffic problems were highlighted in our Parishes recently adopted Neighbourhood Plan and a front page article in the September edition of the Chew Valley Gazette entitled 'Pensford's flying bollards, car crashes and impaled lorries' highlighted three road accidents in a week, 30 vehicles a day mounting the pavement and bollards being knocked over.

Pensford Hill is not wide enough for lorries to pass side by side.



Vehicles regularly mount the pavement and knock over bollards.



There have been meetings between residents of Pensford and Kelvin Packer, Head of Transport in Banes to discuss the existing traffic problems (I can provide notes of these meetings). However, it is clear that although some improvements have been made to the A37 through Pensford the Banes Traffic Dept. does not have a solution to the traffic problems on Pensford Hill.

These new proposals can only lead to a worsening of the already seriously unsatisfactory situation. It is self-evident that locating a further 1000/2500 houses in Whitchurch Village will create further traffic chaos in Pensford. There is no suggestion of a by-pass through Pensford. This was considered in the past, with the level of traffic existing at the time, but was rejected on cost grounds.

The proposed plans for Whitchurch Village are not sustainable as the location is miles away from all major employment centres such as Bristol City Centre or Bath. There are no rail connections or rapid transit services. Bus services are inadequate, the site is miles from any motorway junction and there are few available jobs within six miles. 2,500 new houses will almost certainly result in at least 2,500

new cars (and more likely between 5000 to 6000 cars) on our local roads because of already poor transport links. Many of these will add to the traffic pressures on Pensford, as they will use the A37 for their journeys.

I am further concerned that the proposed major vehicle link to Keynsham and a link to South Bristol will make the A37 the shortest south coast route to the northbound motorways. This might look viable on paper, but in reality, this plan would severely increase traffic flows on the A37 through Pensford to dangerous levels.

The transport link to the A4 will also generate more traffic on the A37 and the potential expansion of Bristol airport (a separate but related issue) will add further to the increase of traffic on our rural roads as the vehicles pass through on the way to the motorways.

The proposed Park and Ride at Whitchurch will attract large volumes of commuter traffic. Undoubtedly, a great deal of this will travel through the village of Pensford on the A37 adding even further traffic congestion and pollution to our local environment.

The planned urban extension is purely to provide housing for Bristol. It is inappropriate for our small rural Somerset community to suffer a vast increase in traffic noise, pollution, hazard and disturbance simply to accommodate Bristol's workers or shoppers and to allow more and more out-of-area commercial traffic to use our village as a shortcut to the motorways. Bristol itself can provide sites that are more appropriate; especially brownfield sites with shorter journey times and better access.

One such site is the now rejected Arena at Temple Meads, or the old Lloyds Bank and Norwich Union Buildings. Using these sites would eliminate the need destroy Whitchurch Village. People would be able to walk or cycle to work, from there, and keep fit at the same time with no increase in air pollution.

Another far more economically sensible location is at Hicks Gate/Brislington Road, which is directly adjacent to the Ring Road with easy access to motorways, already has a Park and Ride, and is near the railway station at Keynsham and (possibly the new) Saltford station. This location would make a far easier commute to Bristol & Bath and already has good shops and schools.

Another more appropriate location is Long Ashton. It has a direct route into Bristol, is near the existing Metro Bus & Park and Ride, close to employment, schools etc.

Finally, I would like to express my solidarity with Whitchurch villagers where 100% of respondents to a survey regarding the JSP said that they valued their green belt. This is an important point and I object to the plans for Whitchurch, which will destroy their small rural Somerset village and turn it into a large and unwanted new town and an extension of Bristol. The number of houses proposed for Whitchurch is disproportionate compared to other areas; for example, the number of new houses proposed for nearer Bath or to the East of North East Somerset in proportion to those in Whitchurch Village is miniscule. This is very unfair to the local community.

In summary, my main objection to these proposals is that they do not sufficiently consider the serious impact on the A37 running through the small rural community of Pensford. A vast increase in traffic would flow from these developments and this would be unsustainable without first building a Pensford by-pass to take the resulting traffic (especially HGV traffic) away from Pensford Hill and the village centre and school. The situation is already unacceptable and Bath & North East Somerset council is finding it difficult to come up with any acceptable solutions. I note that there is currently

no Joint Transport Plan and I strongly urge that these transport issues, together with those already affecting Pensford, are resolved before any new houses receive approval, rather than afterwards.

Yours sincerely

Cllr Sue Grimes

