# Bath & North East Somerset Local Plan 2016-36

Representations to the Issues and Options Consultation
January 2018



# On behalf of landowners at North Keynsham

# **Summary**

These representations have been prepared on behalf of land owners who control land within the North Keynsham Strategic Development Location (SDL)

We support the allocation of land at North Keynsham as part of the emerging B&NES Local Plan.

This document provides a response to the questions posed in the Issues and Options consultation document, Winter 2017.

# Contents

1	Introduction
2	Response to questions posed

# 1 Introduction

- 1.1.1 These representations have been prepared by JLL on behalf of landowners who control much of the land with the North Keynsham Strategic Development Area (NKSDL) as identified in the West of England (WoE) Joint Spatial Plan Publication Document(JSPPD) and the Bath and North East Somerset (B&NES) Local Plan Issues and Options Consultation.
- 1.1.2 These land owners are:
  - The John Douglas Estate, owners of Avon Valley Farm which is circa 110 acres of land
  - Avon Valley Adventure and Wildlife Park which occupies an additional 50 acres of land.
  - MJ Bendall and Partners Ltd, owners of circa 75 acres of land
  - Ollis Keynsham, owners of circa 5 acres of land adjacent to the railway line
  - The owners of Broadmead Lane Industrial Estate and its associated access.
- 1.1.3 The land owners are working together to bring forward the NKSDL and are in discussions with adjoining landowners and developers in order that a comprehensive and deliverable urban extension can come forward.
- 1.1.4 This includes the relocation of the Avon Valley Adventure & Wildlife Park which is located within the SDL and is currently a popular family attraction with 200,000 visitors in 2017 (making it the 3<sup>rd</sup> most popular attraction in B&NES and 10<sup>th</sup> in the West of England. This attraction has grown significantly over the past few years and the redevelopment of the area will necessitate the relocation to a site on the edge of the SDL, as a transition between the new urban area and the surrounding countryside.
- 1.1.5 These representations to the Issues and Options Consultation strongly support the delivery of the land and respond to the questions posed in the document.
- 1.1.6 The owners of land at North Keynsham support the allocation of the land and intend to work with the Council and relevant stakeholders in the coming months to produce further evidence relating to the delivery of the SDL. This will be made available to the council as part of ensuring the delivery of the plan.
- 1.1.7 We therefore submit these representations now, on the basis of available evidence, and look forward to working with all parties over the coming months to help deliver this important development.

# 2 Response to questions posed

# Critical issues & spatial priorities

- 2.1 Q1: Have we identified the critical issues facing the District over the next 20 years?
- 2.1.1 The plan rightly identifies housing need as a critical issue which the plan must address. This is clearly evidenced by Figure 5.1.1.1 in the WoE Topic Paper 4 which indicates that house prices in B&NES are 27% higher than those in the sub region and nationally.
- 2.2 Q2: Are the suggested spatial priorities the right ones?
- 2.2.1 The spatial must deliver development from a range of sources, which includes reuse of brownfield land but also acknowledges that the release of greenfield land in sustainable locations will be required in order to meet the overall requirement for development.
- 2.2.2 The Council's own evidence confirms that the release of appropriate land within the Green Belt will be necessary in order to meet the identified requirements. The land which is released for development must be suitable, available and achievable, so that it is deliverable. A key element of this will be that land is located in sustainable locations, well related to existing places and transport corridors.
- 2.2.3 The land at North Keynsham has been identified through the wider WoE JSP process as such a location and its allocation for development is supported.

#### STRATEGIC DEVELOPMENT LOCATION: NORTH KEYNSHAM

### **Evidence Base**

- 2.3 5a Have we considered all the issues?
- 2.3.1 The North Keynsham SDL Background Paper brings together well all of the work that has been undertaken to date in order to provide the evidence base for the delivery of the site.
- 2.3.2 The evidence addresses key issues such as transport, ecology, landscape and Green belt and does identify the focus for further work. It is the intention of the landowners to support the delivery of the land and to support the further stages of testing and masterplanning, including the appropriate relocation of the Avon Valley Adventure and Wildlife Park (which will be integral to any proposals).
- 2.4 5b What other evidence do you think we need to consider?
- 2.4.1 The work done to date does provide a robust basis upon which to progress and is considered proportionate to the stage of plan preparation which has been reached.
- 2.4.2 Further testing will be necessary to consider the range and scale of uses to be deliverable, along with the most appropriate routes for transport links and green infrastructure routes, along with proposals for the relocated AVW&AP.

# Vision and Objectives

- 2.5 6a What are your views on the vision and objectives?
- 2.5.1 The Vision appears to be a suitable focus for the delivery of a good place to live and work.
- 2.5.2 The objectives are, in principle, supported, though it is the way in which these are delivered in a viable way which will be the test for the next stages of plan making.
- 2.6 6b What type of place should be created here?
- 2.6.1 The Vision and Objectives appear to provide a suitable basis for describing the sort of place that will emerge.

# The Concept Diagram

- 2.7 7a What do you think of the proposed road alignment?
- 2.7.1 Further technical work is necessary to consider the definitive alignment of the road linking the A4 to Avon Mill Lane. The route shown in Option C (which is the only one which produces a viable scheme) is different to that shown in the final Concept Diagram, demonstrating that the route remains to be fixed and discussion will continue, as we progress towards a detailed alignment and may require further land to the south east of the land to achieve a suitable alignment.
- 7b Do you have any views on the existing crossing points? Have you got any thoughts on the overall movement strategy?
- 2.8.1 It is clear that links through the site and to the surrounding areas (both rural and urban) will be critical in enhancing the permeability of the SDL.
- 9a What do you think of the proposed response to landscape impact, especially considering views from the Cotswolds?
- 2.9.1 The initial Landscape and Visual Assessment has started to develop the evidence base and consider the appropriate disposition of development to minimise the wider impacts. This has guided the character of the Concept Diagram in an appropriate manner and will be tested further as we progress to further stages of masterplanning and scheme design.
- 2.10 10a What should the housing mix comprise of?
- 2.10.1 The housing mix should reflect the needs of the local housing market and will, it is anticipated, provide for a range of house types (and values) to deliver a community.
- 2.11 10b Is there any scope for other forms of housing, for example student accommodation?
- 2.11.1 It is unlikely that there will be demand in this location for student accommodation, the marketing wishing to locate such uses closer to the main student locations in Bristol and Bath.
- 2.11.2 Other forms of housing, such as that for elderly persons, is more likely to be suitable in this location and may be delivered as part of the wider housing mix.

#### 2.12 11a Do you agree with the principle of aiming for a Zero Carbon development?

2.12.1 Zero Carbon will be a challenging target to achieve and can only be progressed if the implications are not so significant as to make the overall development undeliverable. The developments impact on the wider environment and its sustainable credentials need to be considered in the round and a focus on Zero Carbon may not necessarily be the most appropriate target for this location.

### Avon Valley Wildlife and Adventure Park

### 2.13 12a How can Avon Valley Wildlife & Adventure Park be best integrated into the new development?

- 2.13.1 The Avon Valley Adventure and Wildlife Park is a successful local business which has grown to the point where it received 200,000 visitors in 2017. This makes it the 3<sup>rd</sup> most popular attraction in B&NES, employing 19 full time and 52 part time staff.
- 2.13.2 The existing buildings of the park and supporting infrastructure are in need of upgrading to reflect the increasing popularity of the attraction and the relocation of the park is an integral part of any proposals for the SDL. Proposals are already being prepared for necessary investment in the site even if the SDL were not to move forward in the near future, driving visitor numbers towards 250,000. This investment looks to significantly expand current operations to create an enterprise less reliant on seasonal trade including seeking ways to capitalise further on its fantastic location next to the Avon, improve, extend & intensify the use of the site, introduce new facilities and widen the use of the site throughout the year.
- 2.13.3 However, with the prospect of significant development, the Park would take the opportunity to relocate to land which is on the edge of the developed area (as shown in the Design Concept in the Background Paper). This would be a transition from the newly emerging urban area to the wider countryside. Providing access to the open space and footpaths, as well as an all year round tourist attraction.
- 2.13.4 However, business continuity is vital for the Park. There can be no break in the provision of services and this will be an important element of any delivery programme. Therefore, this will require the land for the park attractions to be removed from the Green Belt at the earliest opportunity and early detailed approvals will be required to facilitate a phased relocation, investment in quality green infrastructure and no operational downtime for the Park.
- 2.13.5 Central to the proposals for the relocation of the Park will be early implementation / delivery of infrastructure in order to enable the smooth transition from the existing site to the new one. In this way the business will be able to continue and to flourish, providing a link between the new urban area and the wider countryside.



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From: Barrie Jones

**Sent:** 08 January 2018 12:50

**To:** Planning Policy

Subject: Objection to proposals JSP 2500 houses and B&NES 1500 houses and Link Road.

The purpose of this letter is to register my objection and total opposition to the proposed Whitchurch Urban Extension.

It is very important that the Green Belt area adjacent to Church Lane Boundary is listed Nationally. Church Lane has already been enveloped by Windways and Staunton Fields residential developments. These have helped increase traffic congestion causing increased noise, pollution and access problems.

Another development will impair the countryside views and destroy the Natural Beauty of Church Lane and the approach to historic St. Nicholas Church. I hope this proposal will be rejected and allow the residents and visitors in Church Lane to enjoy the Rural environment to which it is accustomed. The proposal breaches the Councils own policy of protecting the Green belt and is the worst location for an urban extension to Bristol on sustainable transport grounds. If urban extensions are needed then other, more sustainable options, exist.

The proposal of a South Bristol Ring Road would be massively damaging to our community, would increase pollution, noise and promote unsustainable travel and would not alleviate traffic caused by 4000 additional houses at Whitchurch Village. The road would damage the environment of the Historic Maes Knoll archaeological site. It would be grossly costly to implement and in practical terms unlikely to be completed.

**B** Jones