



BATH AND NORTH EAST SOMERSET LOCAL PLAN 2016-2036

Issues and Options Consultation

Representations by Mactaggart and Mickel Homes Ltd

January 2018

**ROCKE
ASSOCIATES**

The representations below set out the response of Mactaggart and Mickel Homes Ltd (MM) to the consultation questions identified in the title banners. They should be considered in conjunction with the representations submitted on behalf of MM to the West of England Partnership in response to the parallel consultation on the Joint Spatial Plan Publication Document.





Vision and Spatial Priorities

Q1	Have we identified the critical issues facing the District over the next 20 years?
Q2	Are the suggested spatial priorities the right ones?

The identified spatial priorities are considered to be broadly correct. It is noted that from Table 1 that the following priorities are recurrent:

- Locating development such as to reduce the need to travel and facilitate movement by sustainable modes.
- Facilitating healthier lifestyles, including through active modes of travel and accessibility to appropriate infrastructure, including green infrastructure.





Spatial Strategy Options

Q3

Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth? Please give reasons for your answer.

Q4

Are there any other approaches/scenarios you think should be considered for accommodating non-strategic growth in B&NES? Please give reasons for your answer.

As is reflected in paragraph 3.13, the underlying premise of all three options is a presumption against allocating land in the Green Belt unless it can be demonstrated that exceptional circumstances exist to justify its removal. However, as is explained in the evidence base supporting the Joint Spatial Plan Publication Document¹ and is clear from the emerging strategic allocations, exceptional circumstances exist to justify taking land from the Green Belt to accommodate future growth requirements.

The options considered are therefore too narrow in that they all start from the premise that Green Belt land should be avoided. For this reason they do not appropriately reflect the spatial priorities, none of which relates to protection of the Green Belt. A fourth option should therefore be included, the starting point for which is that exceptional circumstances have been justified for removing land from the Green Belt, as is evidenced in the parallel JSP consultation, and which has as a focus an ‘accessibility’ approach where development is directed to the most sustainable locations having good accessibility to the main urban area of Bath, and the larger towns and villages, including Keynsham and Saltford. This endorses the agreed spatial priorities for locating development, following acceptance that there are exceptional circumstances for releasing Green Belt locations, as evidenced in the emerging JSP².

It is now clear that the current Green Belt boundaries are anachronistic given that they have remained largely unchanged since originally designated. They have served their purpose in terms of containing the outward spread of built-up areas, which have largely expanded to the limits of the inner Green Belt boundaries. Much past growth has also been directed to the larger towns beyond the outer boundaries of the Green Belt. However, the fact that very special circumstances were identified as necessary to accommodate growth requirements during the current Core Strategy period culminating in limited Green Belt releases at Keynsham, is testimony to the need for more comprehensive review of the Green Belt in association with the escalated growth requirements in the period to 2036.

¹ West of England Joint Spatial Plan, Topic Paper 2, paras 3.7-3.9

² Ibid, para. 4.9





As is clear from Table 1, the spatial priorities are now very different since original designation of the Green Belt. Exponential growth in vehicular traffic, and a priority focus on accommodating development such as to minimise travel demands and therefore reduce CO2 emissions as well as promoting healthier lifestyles including through active travel, now challenge the current Green Belt boundaries, the maintenance of which is largely irreconcilable with them. A spatial strategy option that is focused on accessibility and maximising potential for sustainable transport and active travel, is therefore an essential one for consideration given that current Green Belt boundaries are out-of-date, as clearly evidenced in the emerging JSP and of equal relevance to the location of non-strategic growth, and are incompatible in many respects with achieving the spatial priorities set out in Table 1.





Strategic Development Location: North Keynsham

Q5a Have we considered all the issues?

Q5b What other evidence do you think we need to consider?

MM supports the allocation at North and East Keynsham as currently proposed, but considers that there is both a need and potential for greater growth in this location. MM's case for allocation of around 2,000 dwellings at North and East Keynsham is set out in their responses to the parallel consultation on the JSP Publication Document.

It is noted from Diagram 3 that the Council is not seeking to include a contingency allowance in the allocations it is intended to make in the plan. It is therefore assuming that all existing commitments, which account for two-thirds of the supply, and proposed strategic allocations, that account for a further 20% of the supply, will deliver their full capacity. That is an unrealistic assumption. There is already evidence that sites allocated in the recently adopted Placemaking Plan at Bath are stalling. At the very least a 10% slippage allowance should be added to the current requirement which has hitherto been the norm. It should now arguably be higher in the light of the findings of the Housing White Paper³ that housing development on up to a third of sites with planning permission fails to come forward after five years. In this respect it is germane that, in her preliminary findings (June 2017) in respect of the North Somerset Site Allocations Plan, the Examination Inspector recommended the addition of a 20% buffer to compensate for likely delivery shortfalls⁴.

MM notes that the site as currently defined in Diagram 9 will be subject to further detailed assessment. Its overall development capacity has therefore yet to be confirmed.

MM considers there to be some merit in the Link Road in terms of alleviating traffic that might otherwise route through the town. In earlier representations to consultation on the emerging JSP⁵, MM put forward a vision for development incorporating land to the east and south of the allocation as currently proposed that provides a comprehensive and more robust approach to maintaining separation between Keynsham and Saltford simultaneously with increasing development capacity (see copy attached – Appendix 1). Those

³ Fixing our broken housing market, DCLG, February 2017

⁴ North Somerset Site Allocations Plan Examination, Inspector's letter to the Council following the closure of the hearings on 18th May 2017, 26 June 2017

⁵ 'Towards the Emerging Spatial Strategy Document', November 2016





proposals include potential for a segregated bus route to the south of the A4, and a new Park and Ride facility, which would complement the highway infrastructure proposed as part of the strategic allocation, and in particular facilitating rapid bus transit.

Consideration should be given to the evidence already submitted by MM, an earlier version of which the Core Strategy Inspector acknowledged as having some merit, but was not necessary to accommodate the housing requirements that were before him for consideration⁶. The comprehensive green infrastructure proposed based on the gas pipeline *cordon sanitaire* will provide both more robust and enduring separation between Keynsham and Saltford, as well as a key recreational facility for the existing and new communities. It will also afford the opportunity for sustainable transport connections between Keynsham and Saltford that are both safer and of higher amenity than using the A4. With increased urban development in the vicinity, the land to the south that is already subject to urban encroachment will be under increasing pressure, and of further reduced viability and capability of beneficial use as farmland.

Therefore the evidence submitted to the Core Strategy Examination, the Core Strategy Inspector's findings, and the updated development concept submitted in earlier representations to the JSP, should all be given careful consideration.

⁶ Report on the Examination into Bath and North East Somerset Council's Core Strategy, 24 June 2014, para. 208





Strategic Development Location: North Keynsham

Q6a What are your views on the vision and objectives?

Q6b What type of place should be created here?

As the proposed vision acknowledges, the area that is contemplated for allocation in Diagram 6 is currently 'isolated'. A key objective must be to ensure its integration with the existing communities of both Keynsham and Salford, and to assist with connecting Keynsham to strategic walking and cycling routes. However, it is essential that the development does not remain as an isolated urban neighbourhood. To this end a more comprehensive development that brings forward additional housing on land to the south, including the west side of Salford and gives it a more outward focus onto a new strategic parkland that connects through to the new urban neighbourhood to the north, would assist with integrating the new neighbourhood with the existing communities of both Keynsham and Salford.





Strategic Development Location: North Keynsham

Q7a What do you think of the proposed road alignment?

Q7b Do you have any views on the existing crossing points? Have you got any thoughts on the overall movement strategy?

As is acknowledged in paragraph 4.09 of the consultation document, access to the northern part of the site is significantly constrained by the railway, the River Avon and by associated capacity constraints on the A4 and connecting road. It is in large part because of the physical access constraints that substantial road infrastructure is required to accompany the development of the strategic location.

Improved accessibility to the Station and wider cycle network is to be welcomed and an advantage of the strategic development site that is currently identified. However, it does little to resolve the difficulties of congestion on the A4, and will discharge a large volume of additional development traffic onto the principal route which may limit the advantages of the proposed MetroBus.

In their vision for the remainder of the gap between Keynsham and Salford, MM has demonstrated the potential for opening up sustainable transport routes through a comprehensive development area to the south of the A4 (and which the Core Strategy Inspector acknowledged as having some merit). This would compliment the movement strategy for the currently proposed allocation by enhancing public transport movement on a key part of the route, and thereby alleviating some of the congestion that is currently experienced on the A4 between the Broadmead Roundabout and Salford. A Park and Ride facility at the entrance to Salford that forms part of MM's conceptual proposals could further compliment the overall strategy.

The movement strategy could therefore be complimented and enhanced through a larger allocation incorporating the entirety of the gap between Keynsham and Salford in accordance with MM's vision for a new Parkland Community (see Appendix 1). It would also provide a greater critical mass of development to assist with bearing the very substantial infrastructure costs associated with the development concept currently identified in Diagram 9.





Strategic Development Location: North Keynsham

Q8a	What do you think of the proposed approach to the street network and wider connections?
Q8b	Do you think it is important to create a healthy neighbourhood by encouraging walking and cycling?

The wider connections are key to the integration of the new urban neighbourhood with the existing urban communities of Keynsham and Saltford. As is reflected in Diagrams 6 and 7, both provide accessibility to a good range of services and facilities.

Allied with MMs vision for comprehensive treatment of the gap between Keynsham and Saltford, the wider connections would be much enhanced. Walking and cycling would also be enhanced via connection with the new strategic parkland that is proposed as part of MMs vision, and from which would emanate sustainable and attractive low traffic routes stitching into the existing urban areas of both Keynsham and Saltford, with their associated good levels of facilities.

The encouragement of walking and cycling is central to sustainable transport policies, policies for climate change, and those seeking to encourage healthier lifestyles. It is therefore extremely important on all of these counts to create a healthy neighbourhood that encourages travel by such modes. Proximity and accessibility to wider urban facilities, as well as to good public transport services, is central to promoting these objectives. A more comprehensive urban neighbourhood at North and East Keynsham incorporating the proposed allocation together with MM's vision for a new Parkland Community comprising a comprehensive scheme for the residual gap between Keynsham and Saltford, will enhance these objectives.





Strategic Development Location: North Keynsham

Q9a

What do you think of the proposed response to landscape impact, especially considering views from the Cotswolds?

Q9b

How can we improve the Green Infrastructure network through the site?

It is acknowledged in the evidence base that the Landscape and Visual Assessment that has been undertaken is ‘necessarily general given the hypothetical nature of any development’⁷. The proposed mitigation strategy is considered to be an appropriate response, but will need to be further tested and refined through more detailed site and environmental assessment. A potential consequence is a reduction in the capacity of the development area that will need to be offset elsewhere.

Expansion of the allocation to include MM’s Parkland Community would provide a buffer against reduced capacity and also contribute to maximising development in one of the most sustainable locations in the district. Moreover, it would improve the Green Infrastructure network by extending and enhancing the area identified as ‘naturalised open space/grazing’ on the eastern margin of the proposed development area as currently defined. MM’s new parkland would continue the strategic open space to the south of the A4, providing a more extensive recreational space, and robust and attractive green routes between the proposed development to the north and that to the south as well as the existing urban areas of Keynsham and Saltford. MM’s proposals would therefore provide a strong green ‘spine’ based on the gas pipeline *cordon sanitaire*. It will be a managed, strategic, multi-functional public open space, will be subject to comprehensive landscape planting, and will simultaneously provide and maintain strong and permanent separation between the adjoining urban areas that is not subject to the current problems of urban encroachment and low intensity land use and management.

⁷ Background Paper, North Keynsham Strategic Development Location, para 3.4





Strategic Development Location: North Keynsham

Q10a What should the housing mix comprise?

Q10b Is there any scope for other forms of housing, for example student accommodation?

Details of the housing mix will be determined at the application stage, but it is likely that a range of sizes, types and tenures will be appropriate.

The location is not well suited to student accommodation given the location of the district's two main Universities, and the scale, density and form of such developments. The focus for student accommodation should therefore be at Bath, in which case North and East Keynsham is an ideal location to accommodate further displaced housing demand which is an additional reason to maximise the potential contribution of this strategic development location for accommodating future growth requirements.

There is high demand for accommodation for care for the elderly. Given the benign nature of the terrain, and good accessibility to a range of services and facilities, North and East Keynsham is well placed to provide for such needs. This is a further reason for maximising the potential of this strategic location which is extremely well positioned to accommodate a very wide range of accommodation needs, albeit not those arising from students.





Strategic Development Location: North Keynsham

Q11a Do you agree with the principle of aiming for a Zero Carbon development?

Q11b How ambitious should we be? How do you think this aim could be achieved?

The NPPF requirement to actively plan for new development in ways which reduce greenhouse gas emissions relates as much to the macro-scale of ensuring that development is well-located to reduce the need for vehicular trips, in particular by car, as it does at the micro-scale of zero carbon developments. Maximising the development potential at highly sustainable locations such as North and East Keynsham is likely to contribute to a far greater extent to reducing greenhouse gas emissions than requiring the units comprising the development itself to be built to a zero carbon standard.

For reasons set out in response to Questions 3 and 4, if the Council has a genuine ambition to reduce carbon emissions, then an alternative strategy that places accessibility above Green Belt protection should be adopted. That will result in the potential of North and East Keynsham being maximised through extending the site area and development concept currently identified to include MM's proposals for a new Parkland Community incorporating additional land to the south and east of the allocation as currently proposed. It should also go beyond this to consider the potential for further, non-strategic allocations in the vicinity of Keynsham and Saltford. That is likely to contribute in a far greater way to reducing carbon emissions, particularly if it reduces the need for developments in far less sustainable locations, such as the proposed new Garden Village at Buckover.

With specific regard to the micro-level issue of the actual development itself being built to a zero carbon standard, ambition must be tempered with realism, particularly having regard to the very substantial infrastructure costs that the development as currently proposed will have to bear. It is therefore unlikely that the development can achieve anything more than statutory requirements as prescribed in Building Regulations. It would be inexpedient to set a higher policy standard without the most robust of evidence to demonstrate that it can be borne by the development, which would already seem under stress having regard to the scale of development currently proposed relative to the potential costs that it must bear.





Strategic Development Location: North Keynsham

Q12a	How can Avon Valley Wildlife & Adventure Park be best integrated into the new development?
Q12b	What opportunities are there to minimise visual impact from the Cotswolds?
Q12c	Do you agree with the requirement to link with the Bristol to Bath cycle path?

Extending the development area as currently proposed to include MMs Parkland Community would provide the most beneficial response to the first two issues. It would facilitate flexibility to respond to impacts that will be subject to further and more detailed assessment as the development proposals evolve. For reasons set out in response to earlier questions, extension of the strategic open space to the south of the A4 would also assist with connectivity between the existing and new communities, including connections to the Bristol to Bath cycle path for the existing community via any future new link.

Given that Green Belt land is to be released for development to the north and east of Keynsham, it is imperative that the potential of the location is maximised. For reasons set out in response to the JSP Publication Document, and as acknowledged by the Core Strategy Examination Inspector, the fundamental purpose of the Green Belt would still be achieved with development in the gap between Keynsham and Salford.





APPENDIX 1

**CREATING A NEW PARKLAND
COMMUNITY FOR KEYNSHAM AND
SALTFORD**



Creating a new parkland community for Keynsham and Saltford

A response to consultation on 'Towards the Emerging Spatial Strategy document'

Representations by Mactaggart and Mickel

December 2016

CliftonEmerydesign



1.1_Introduction

This document has been prepared by Clifton Emery design on behalf of Mactaggart and Mickel. It examines the potential that exists to develop land east of Keynsham in order to meet significant proportions of the requirement for housing and employment into the future. It has been prepared to inform the West of England's Joint Spatial Strategy (JSP) which has highlighted the future requirement for 1,100 homes in East Keynsham.

The West of England Joint Spatial Plan: Towards the Emerging Spatial Strategy Document, highlights that

This location performs well in the Sustainability Appraisal and will also be effective in helping to deliver the Plan's Strategic Priorities. Being a town expansion situated on a strategic transport corridor well related to Bath & Bristol it fits well with the spatial strategy methodology as set out in Topic Paper 5 Spatial Strategy Methodology. The proximity to central Bristol provides the opportunity to exploit both existing and potential new sustainable transport infrastructure including conventional bus corridors, Park & Ride, the Bristol to Bath Railway line, the Bristol-Bath cycleway, and future MetroBus or rapid transit.

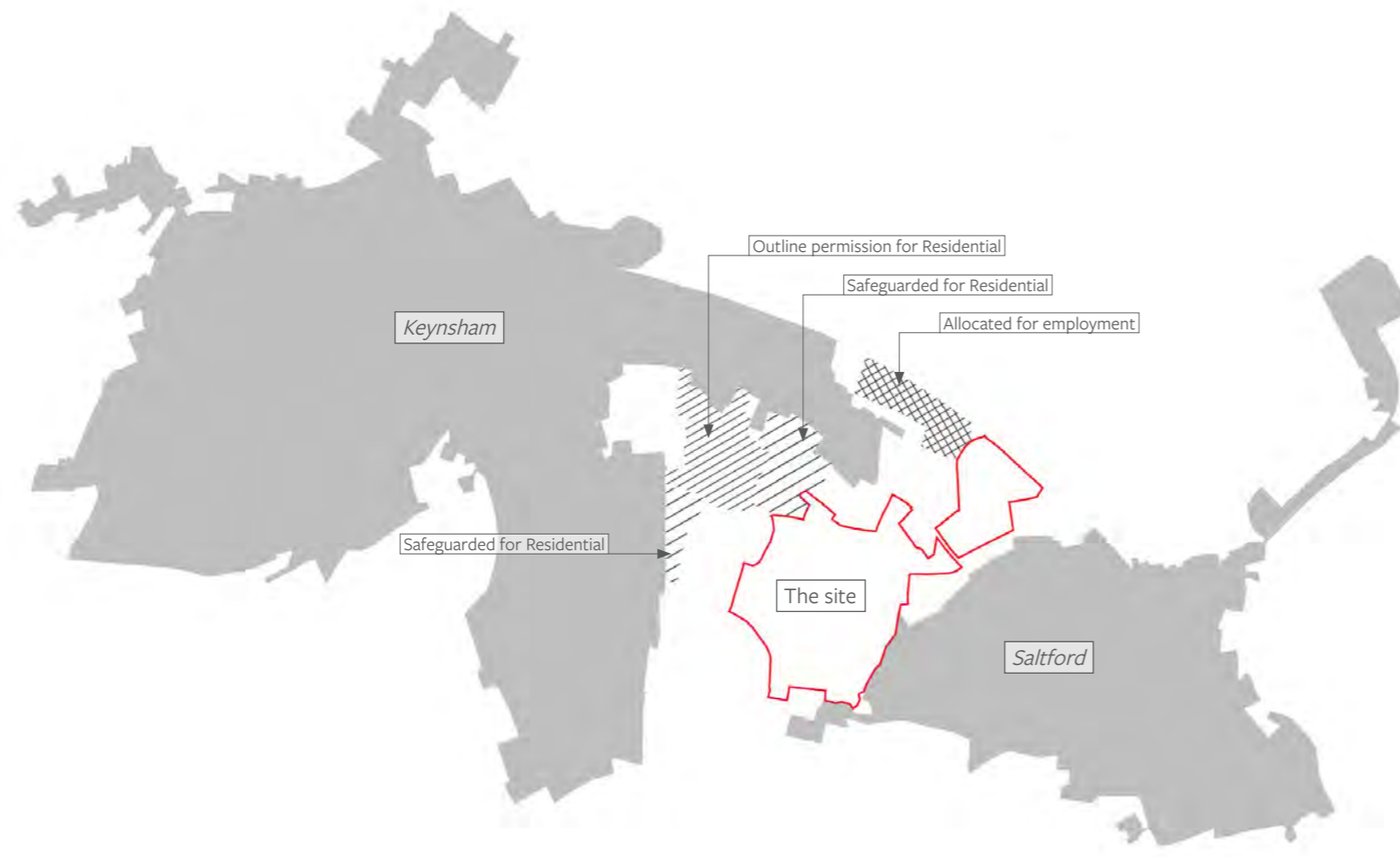
The land available for development would be immediately deliverable and allow Bath and North East Somerset (B&NES) to deliver the required 1,100 homes highlighted within the JSP.

- 250 homes within allocated land at East Keynsham has outline planning permission
- 250 homes are reserved within safeguarded land
- 600 homes at West Saltford are proposed for allocation

This document demonstrates that it would be possible to develop a significant number of new homes in a sustainable location and in a manner that would have minimal adverse impact upon the environment.

The document explains how, by establishing a new parkland environment, new housing could be developed that creates an attractive and sustainable extension to Saltford. It demonstrates that new areas of housing could be located and designed so that they relate positively to the existing settlement centres, established facilities including primary and secondary schools, the A4 as a major public transport corridor and to existing landscape and green infrastructure features.

Moreover, the document illustrates how it would be possible to achieve a permanent and well-considered strategic landscape gap based upon sound place-making principles between the eastern edge of Keynsham and the western edge of Saltford and furthermore to support the existing communities through positive new development that builds upon the distinctive sense of place and identity of the area.





1.3_Planning Context

Full representations to the 'Towards the Emerging Spatial Strategy' document have been made on behalf of Mactaggart and Mickel by Rocke Associates, but for context the following summary is made.

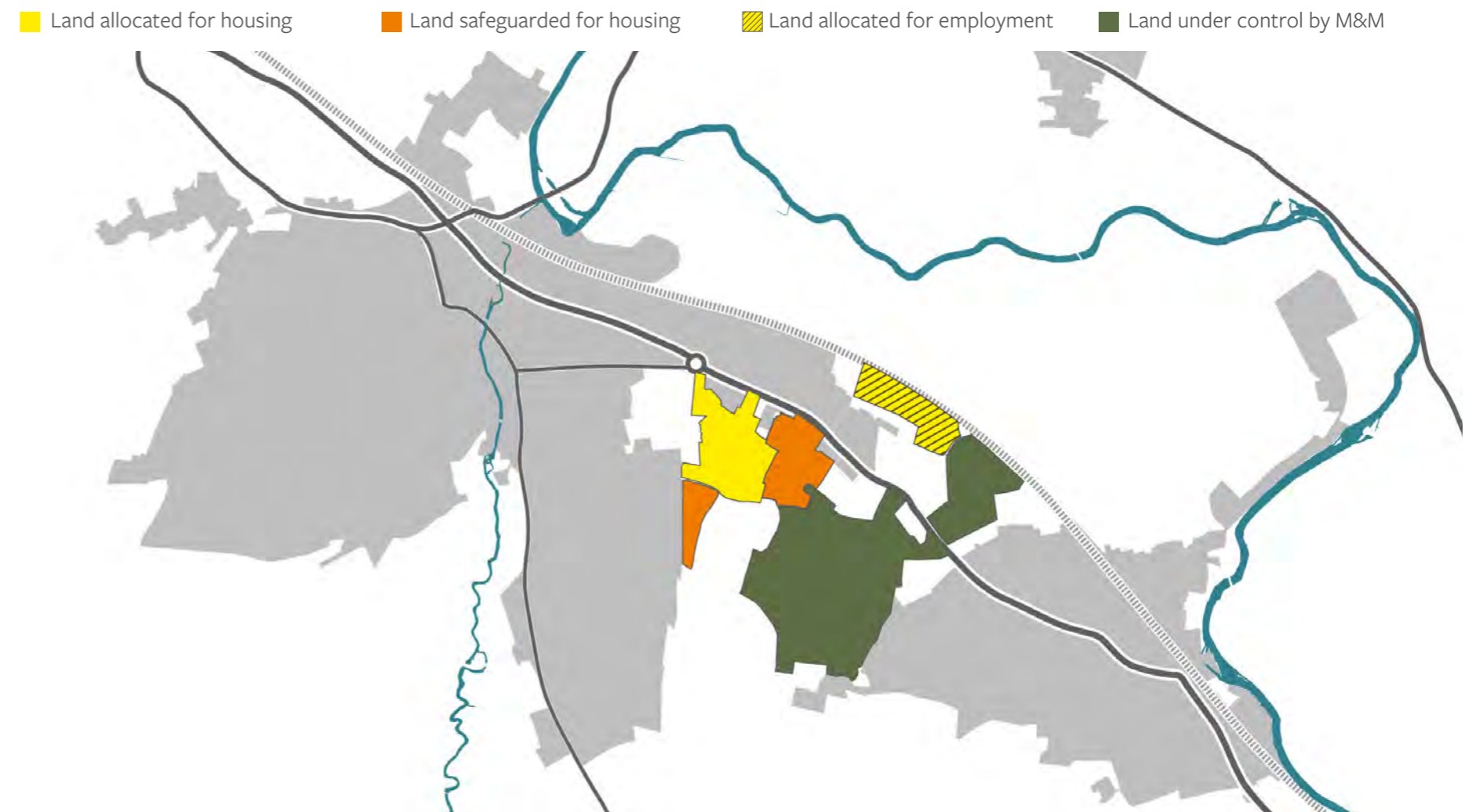
North and East Keynsham has been highlighted as a strategic growth location within the 'The Joint Spatial Plan: Towards the Emerging Spatial Strategy'.

The JSP identifies 1,100 dwellings could be accommodated on land here. Currently 250 dwellings at East Keynsham has recently been given outline planning permission alongside land safeguarded for future residential development that could deliver an additional 250 dwellings. The residual 600 dwellings could be delivered on land under Mactaggart and Mickel's control on land east of Keynsham.

Whilst the identification of North and East Keynsham, including land in the Green Belt, as a strategic growth location is acknowledgement that there are exceptional circumstances for removing land from the Green Belt, and that the location to the north and east of Keynsham is both the most sustainable in accessibility terms and the least sensitive in terms of Green Belt purposes, this location is considered to have greater potential than the 1,100 dwellings suggested in the Plan.

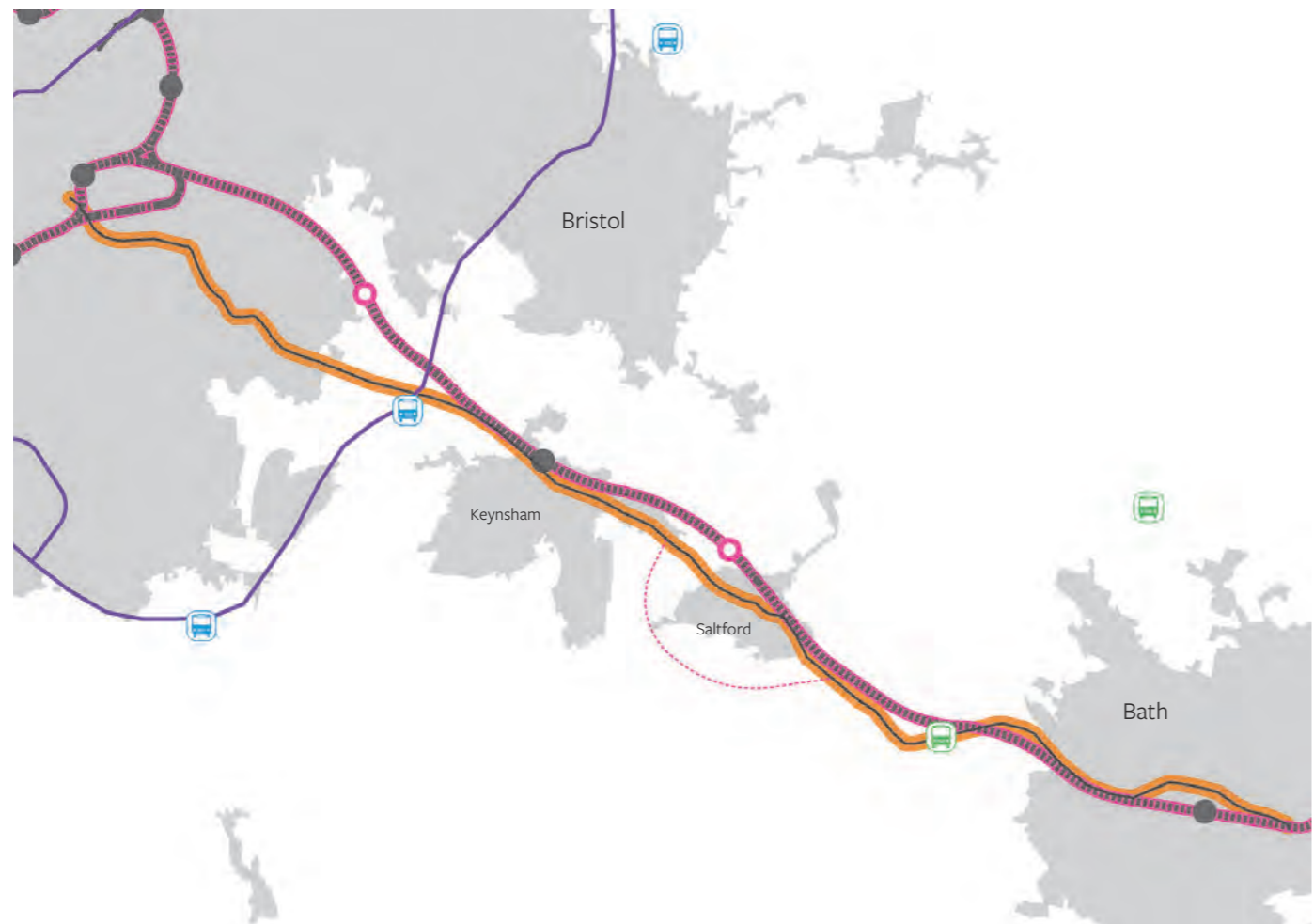
The development concept previously promoted through the BNES Core Strategy has been revisited and refreshed in the context of the emerging JSP strategy and development requirements. The development concept again demonstrates how a comprehensive approach to the gap between Salford and Keynsham can deliver significant additional development capacity simultaneously with providing more robust and enduring separation between the settlements based on a new community parkland that will deliver significant benefits for both the existing and future communities.

The JSP promotes development along established transport corridors further more 'West of England Joint Transport Study: Transport Vision' is proposing to introduce a Rapid Transit public transport corridor between Bath and Bristol, to complement improvements on the existing rail corridor, and provide for a wider range of trip options. This would possibly be bus-based but the ambition is for a light rail (tram) solution along the A4 corridor. This would be delivered as a package with highway investment including a Salford Bypass and a new train station at Salford



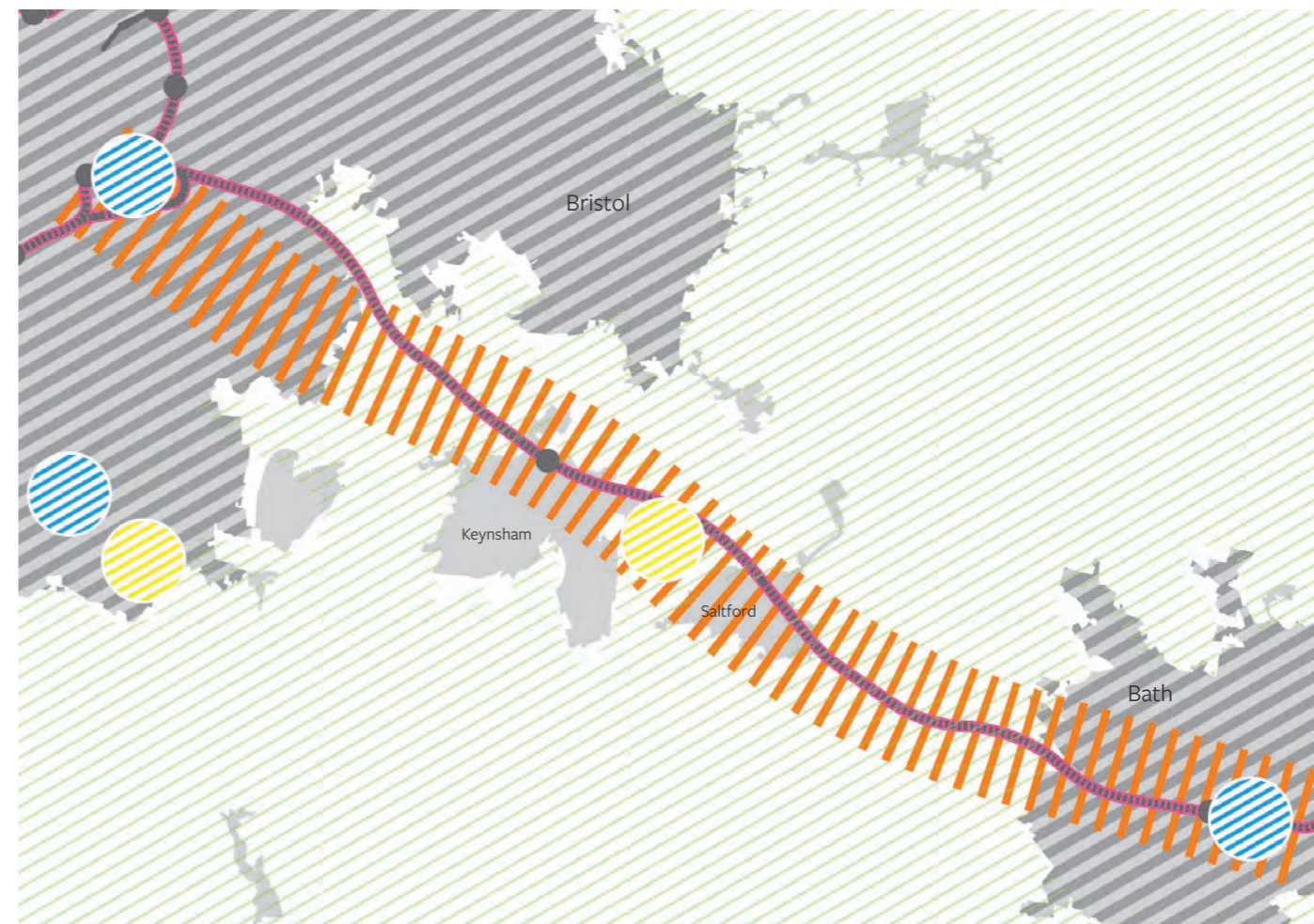
Above: Plan showing allocated areas in relation to land under control west of Salford

- Train stations
- New train stations
- 🚌 New park and rides
- 🚗 Improved park and rides
- ⋯ New road
- ▬ Rail improvements
- ▬ Road improvements



Above: Plan showing the improvements highlighted by the Joint Transport Study: Transport Vision Summary Document' consultation

- ▬ Strategic Transport Improvement
- ▬ Urban Living
- ▬ Green Belt
- 📍 Strategic Employment Location
- 📍 Strategic Development Locations



Above: Plan showing the improvements highlighted by the 'Joint Spatial Plan: Towards an Emerging Spatial Strategy' consultation

1.4_The Site Today



The site is flat, open and agricultural in character with open views across the wide valley floor to the wide valley sides and hills. The flat open nature of the landscape gives prominence to features such as woodland copse and mature trees that may be lost in a more enclosed landscape. The flat topography of the site is characteristic of the River Avon valley bottom.

Kelston Round Hill is a prominent and significant landmark in the landscape. It appears dramatic in nature as viewed from the flat valley bottom, due to its distinctive steep form and unusual wooded crown.

Existing mature hedgerows and copses play a significant contribution to the character of the site; the journey across the site is through a series of fields where views of the next field or copses are open up as you pass through the hedge.

To the eastern boundary the character is residential in nature, constituting 1-2 storey post war dwellings. There is a prominence of 'horsiculture' edging into the green space, along the eastern boundary.

There is a wooded character to the south and west of the site that is well maintained and used with a series of walkways, openings and seating. The woods are mainly deciduous and contain a large number of birch, beech and oaks.

The A4 is a busy main road with almost constant traffic during the day peaking at morning and evening rush hour. The noise is apparent within the immediate proximity of the A4 but it is less apparent further within the site.

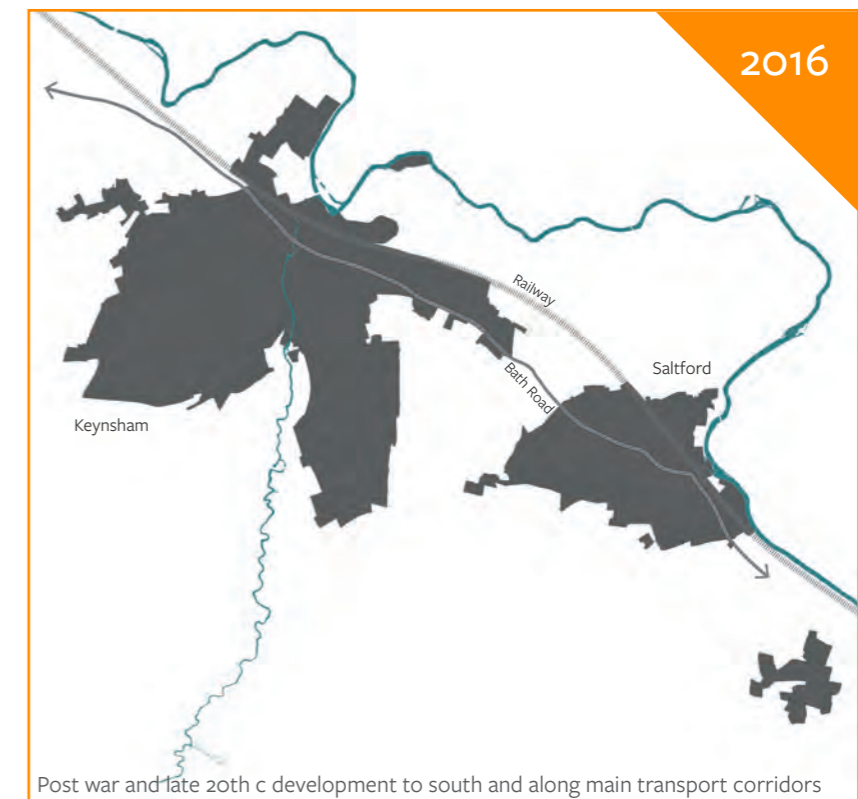
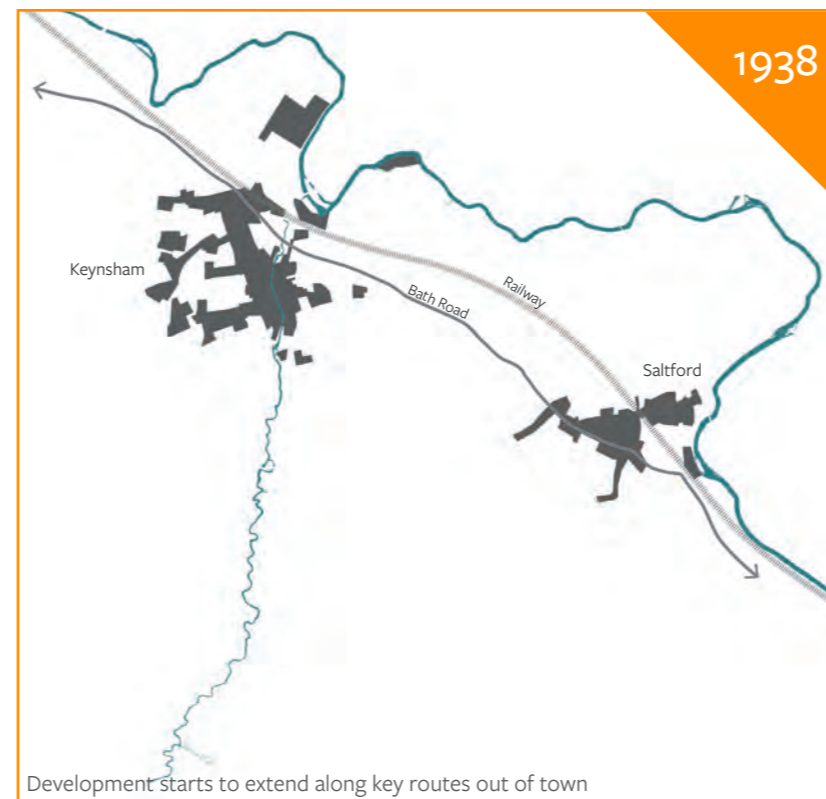
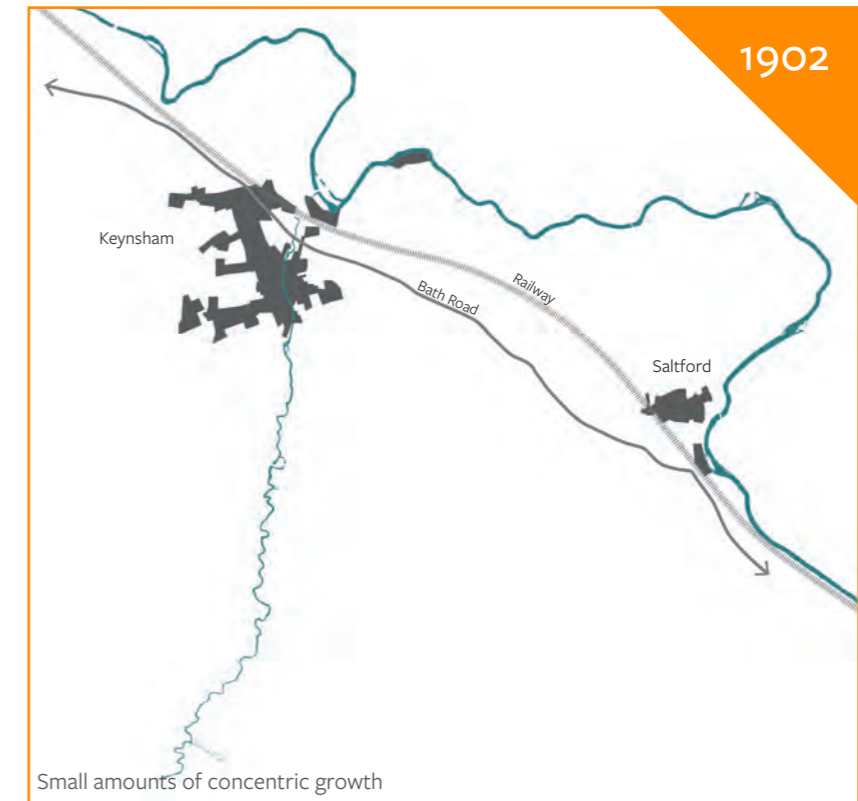
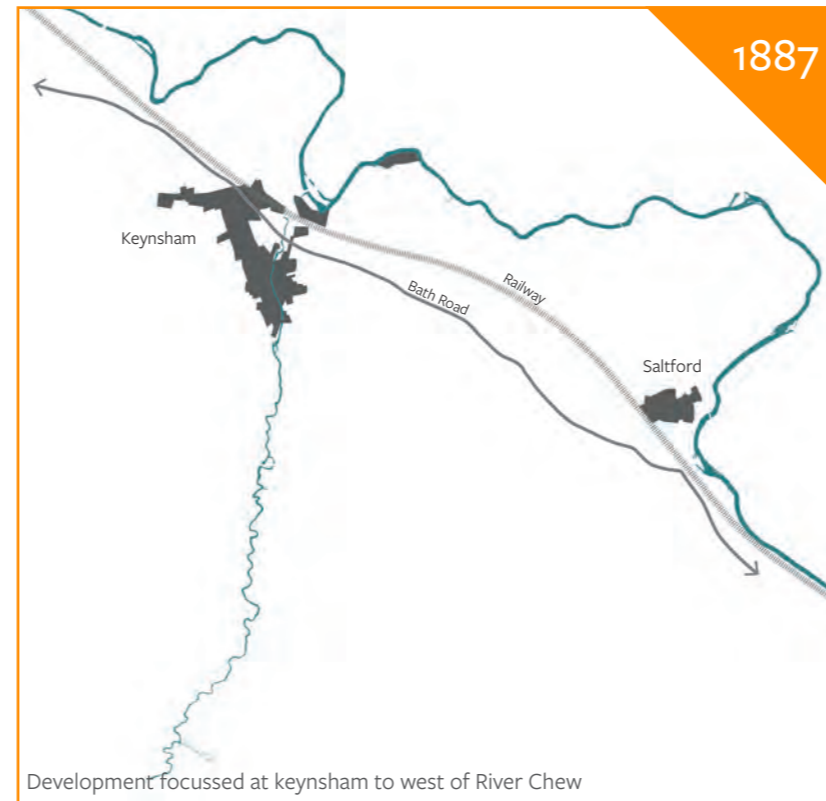
The character of the A4 is dominated by the heavy vehicular traffic and commercial as well as residential uses that have developed along it between Keynsham and Saltford in a linear manor having the effect of closing the perception of any gap between the 2 settlements. The perception of a landscape gap from the A4 between the two settlements is restricted to a narrow strip between residential houses and Copse Road.

1.5_Historical Development

Salford and Keynsham have been subject to considerable post war growth from their nucleated original form.

Keynsham was much re-developed in the 1960's and 1970's. This caused a considerable loss of heritage; with long sections of re-built frontages in High Street, Bath Hill and Temple Street; all having poor quality built form. From the town centre housing estates have spread outwards in areas not subject to green belt and flooding constraints that have largely controlled unchecked development.

Salford too was subject to large areas of housing spreading southwards from the A4 during the 1960's and 1970's towards the form of the village we see today.



1.6_Constraints

There are a number of constraints across the area and none appear to represent insurmountable obstacles according to the initial technical appraisals that have been undertaken by the Mactaggart and Mickel design team.

The area lies east of Keynsham and is principally characterised by arable, pasture and grass lands with hedgerow, ditches, some trees and other countryside features. The A4 divides the north and south areas of the land holding and the railway which runs east west between Bath and Bristol defines the northern boundary.

The topography of the area is reasonably flat with a very gentle slope towards the stream that crosses the land east west.

There are significant areas of housing in Keynsham to the west and Saltford to the east. The edges of these settlements are weak in townscape terms – presenting back gardens to the open land. There are also small fragmented clusters of residential development that front onto the A4. The A4 is a major public transport corridor. Wellsway secondary school lies adjacent to the site on the eastern edge of Keynsham and the town centre of Keynsham is further west from here.

To the north of the A4 is a broad mix of land uses comprising industrial units, large format retail including a Waitrose supermarket, some pockets of housing, a nursery and farm as well as a mixture of employment uses including industrial units. Land to the north of the railway line is largely undeveloped with the exception of the sewerage works and waste treatment site. The Avon Valley Farm and Avon Valley Country Park are also in this area.

The Manor Road Community Woodland lies adjacent to the south west edge of the site. This forms part of the Forest of Avon.

The land lies either side of the A4 and there are a number of points along this road corridor that might be suitable for access into the land. Access to the south could be gained from Manor Road which connects the southern areas of east Keynsham and Saltford. This road is relatively narrow and in its current form provides limited capacity potential.

The railway line restricts access to the north of the site. There are frequent services to Bristol, Bath, Keynsham and Saltford from the site as well as to a number of other local towns and villages. Keynsham railway station to the west of the site provides train links to Bristol, Bath, Wales and London.





















There are a number of designations in and around the site to have regard to in bringing forward development proposals. These include;

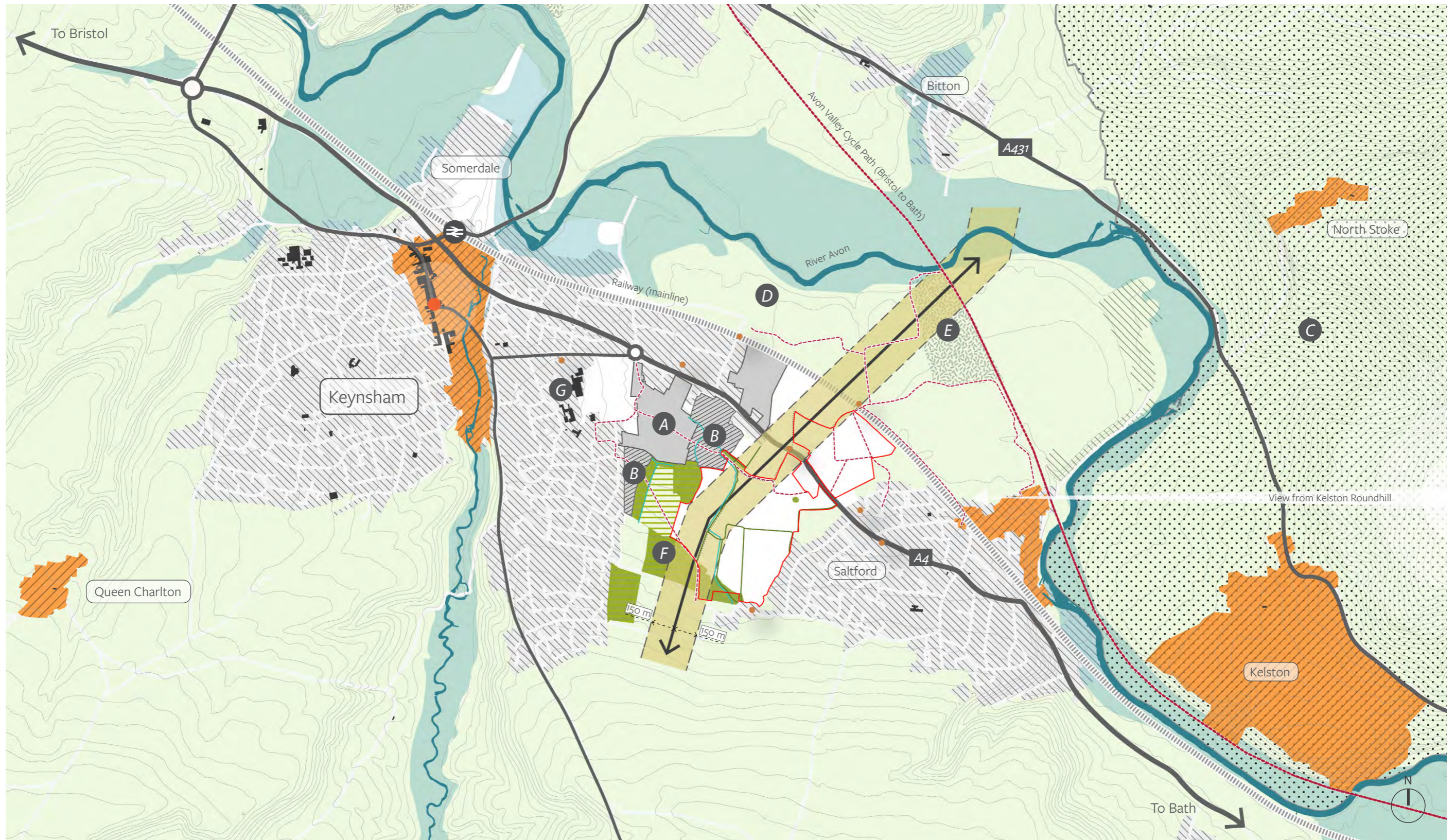
- Manor Road Community Woodland Local Nature Reserve
- Green belt land
- Class 2 agricultural land
- Broadmead Farm SSSI
- Stidham Farm SSSI / SNCI
- Keynsham and Saltford Conservation Areas
- Cotswolds AONB
- Various public rights of way through and around the site
- Listed buildings
- A Roman site near the Avon Valley Country Park

Areas in and around the site have been identified as having historic landscape character and within the B&NES Landscape Character Assessment the site falls within Character Area 14: Avon Valley

The area of land between Keynsham and Saltford provides an important strategic landscape break between the settlements

Other constraints include; Restricted access over the railway/ the capacity of existing road network/ the gas pipe line that runs through the centre of the site with 150m easements either side/ adjacency to the sewerage works.

	Community buildings		Ownership boundary
	Listed buildings adjacent to site		PRoW
	Gas pipe and 150 m easement		Keynsham train station
	Community Woodland		Site allocated for development
	Development		Safeguarded land
	SSSI		Cotswolds AONB
	AONB		Avon Valley Adventure Park
	Floodzone		Stidham SSSI
	Greenbelt		Manor Road Community Woodland
	Conservation area		Wellsway School + Chandag Junior School



2.1_Opportunities

The development of land east of Keynsham presents a number of place-making opportunities that have the potential to establish a positive new sustainable parkland community for the Bath and North East Somerset district. Site analysis and conclusions from the visual appraisal have highlighted potential for the following opportunities:

1. A new strategic parkland connecting existing communities to the countryside

A A new parkland environment

A major new community park of regional significance could provide a focus for the new area and a new strategic resource that secures many of the B&NES Green Infrastructure objectives. The parkland would provide an attractive setting for new housing and employment space and establish enhanced recreational, environmental, and ecological potential. The parkland would provide the basis for a distinct new sense of place bringing many healthy lifestyle benefits.

B Maintaining a permanent strategic gap

The presence of the gas pipe line and its easement area (150m on each side of the pipe) provides an opportunity to establish a permanent separation between Keynsham and Saltford that would deny any possibility of coalescence of the two settlements in the future. The creation of a new public park would further reinforce this.

C Celebrate the Locally Iconic Views of Kelston Round Hill

Create a public open space that lines with the view and forms a focal point to the wider community. Semi formal open space could form a village green that could incorporate a visitors centre and parking to ensure that the wider community can enjoy this regionally important parkland.

D Low Density Edge towards the AONB

Development nearest the Cotswolds AONB needs to be sensitively designed to mitigate against landscape and visual impacts. There is an opportunity to develop an innovative and sustainable housing development with low energy housing. The illustrative master plan could be designed so that individual houses could be designed to maximise their solar efficiency and ensure a good foundation for achieving low energy use.

E Strategic north south connection

The proposed community parkland has the potential to enhance existing

green infrastructure features and amenities and to provide a stronger context and more connected and attractive setting for them. Opportunities exist to link the use, management and character of the new parkland with the Manor Road Community Woodland, the Forest of Avon initiative, the Avon Valley Country Park, the Avon Valley Farm and the River Avon corridor. It also offers the potential to secure a outstanding publicly accessible green swathe that runs from south to north between Saltford and Keynsham.

F A multi functional community parkland

An opportunity exist for the new parkland to become an improved ecological asset by enhancing existing hedgerows, watercourses, ponds, ditches, trees and flora and fauna, as well as by enhancing opportunities for greater biodiversity through the establishment of new meadows, expanded woodlands and wetland areas.

G Better connections

By establishing a new east west pedestrian/ cycle route between Saltford and Keynsham an opportunity exists to make better connections with existing facilities and to ensure that new facilities are well located in relation to key routes. It would also be possible to establish better and safer pedestrian crossing points over the A4. Also there is an opportunity to enable existing public rights of way to be joined up and for enhanced connections to be made both with the Avon Valley (Bath – Bristol) cycle track to the north and the Wansdyke Heritage Greenway to the south.

H Expansion of the Community Woodland and Forest of Avon

The new parkland would provide an opportunity to expand key elements of existing community infrastructure and to secure management roles for existing community organisations.

I Improved drainage management

An opportunity exists to adopt a fully integrated SUDS regime for the area to ensure effective management of water throughout the area and prevent any downstream flooding. The current watercourse could be widened as necessary to form additional areas for storage that improves the current situation where areas downstream near the A4 that are currently subject to flooding.

J Landscape Breaks

Introduce landscape breaks in development parcels to minimise landscape and visual impacts.

2.A comprehensive and sustainable solution

K A critical mass of new housing

There is potential to make best use of the opportunity to create a development in a very sustainable location. It is possible to secure a significant amount of the B&NES future housing and employment need in a single location. By achieving an appropriate critical mass more focused community infrastructure provision could be provided to the benefit of Keynsham, Saltford and the wider District.

L A comprehensive and cohesive proposal

The land in question is under the control of Mactaggart and Mickel and as such is it is possible for a comprehensive scheme to be developed.

M Close proximity to the A4

Locating development along the A4 east of Keynsham where there are excellent public transport services which are to be further enhanced will maximise potential for transferring trips from car to public transport. The extension to existing built up areas would be located positively in relation to the A4 corridor, near the railway and Keynsham station, just south of National Cycle Network 4 linking Bath and Bristol, and adjacent to existing communities with established services, amenities and focal points for retail and employment.

N Park and ride

A 200 space Park and Ride could potentially pick up 200 eastbound trips which would be equivalent to trip generation from 1150 homes which would more than compensate for the impact from the proposed 600 homes on the A4 between Keynsham and Bath.

O Repair of the urban edges

The urban edges to Saltford are weak from a townscape perspective. These areas of fringe development comprise isolated housing often with the backs of properties fronting open land. An opportunity would exist to mend the urban form and establish a much more attractive built environment – a new setting for the parkland.



2.2_Vision

2030. Living in the Parkland community means being able to enjoy the best of country living within a mile of the heart of a bustling town centre and within easy travel distance to the centres of Bristol and Bath. This means living in a community that offers a healthy and truly sustainable lifestyle. The Parkland is a terrific asset and today provides a fabulous resource wrapping around the fringes of Keynsham and Saltford.

The Parkland has become a catalyst for change as new neighbourhoods have emerged to define its edges. It now offers a unique environment - a focus for outdoor pursuits and community living. The Manor Road Community Woodland - part of the Forest of Avon initiative is now double its original size creating a fantastic backdrop to the housing areas.

The diverse local green spaces that dominate the character of the Parkland have established a great setting for the new housing. This has been innovatively designed to be contemporary, comfortable, in keeping with local traditions and to minimise its impact on the planet. The Parkland is most definitely sought after location for house buyers.

What really sets the Parkland apart is the ability for people to live a 2030's lifestyle in an area with a superb landscape setting and distinct identity and sense of place that builds upon the assets of the established Keynsham and Saltford communities. This is made possible in part by the woodlands, the wetland areas, the proximity of local centres, the Avon Valley Country Park, Avon Valley farm, and the Avon Valley cycle path - all of which continue to grow from strength to strength as assets of the area.

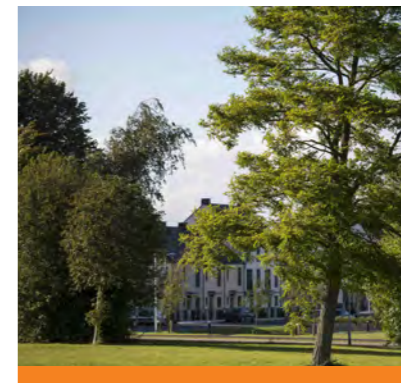
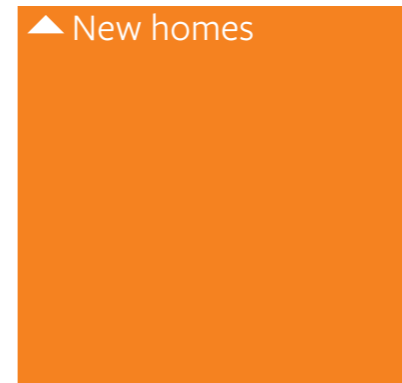
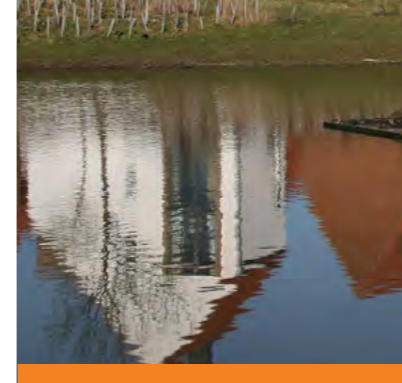
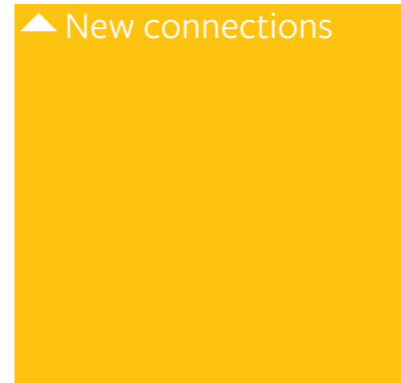
Modern homes in the Parkland are sought after by people of all ages. People now choose to live in what have become

mature and thriving neighbourhoods set within a lovely leafy environment. Today's Parkland is modern, green, vital with local flora and fauna, and really convenient - the area is well connected by cycle, bus and train to the centres of Keynsham, Saltford, Bath and Bristol as well as surrounding local villages and other attractions.

The Parklands has a strong and balanced community with a genuine civic pride for what has been achieved - it is a great place to be a part of. The fabulous network of rides, woodland walks and glades, educational facilities, food and drink producers, community facilities, small businesses, bridle paths, cycle and footpath walks through the Somerset landscape in the setting of the Cotswolds to the north is a truly healthy place in every way.

At the Parklands modern countryside living meets with urban living in the middle of the Twenty First Century. Here town meets country and modern technology is as essential to the well being of people in the community as managing the land and growing fresh produce throughout the year.



















Creating a new parkland
community for Keynsham
and Saltford



The master plan has been shaped in order to create a new and improved relationship between Keynsham, Salford and the countryside. The ecology of the site would be maintained and enhanced and new and better connections would be established with existing communities.

A new Parkland would become the focus of the communities. Existing hedgerows, woodland, watercourses and other site features would be enhanced.

Legend

-  Landownership Boundary
-  Allocated Land
-  Safeguarded Land
-  Public right of way
-  Residential
-  Employment
-  School
-  Park and Ride
-  Park
-  1 Railway
-  2 Petrol Station
-  3 Glenavon Farm
-  4 Salford Community Association
-  5 Wellsway School
-  6 Chandag Junior School
-  7 Chandag Infant School
-  8 Salford Primary School
-  9 Supermarket



2.4_The Masterplan

The new Parkland community is well positioned to relate positively with Keynsham and Salford. The development would comprise much needed new housing, cycle and footpath links and the opportunity of establishing a significant new parkland of regional importance. The proposed development at East Keynsham would have strong connections to the adjacent existing communities promoting healthy lifestyles and a physical separation between the two settlements in perpetuity in the form of a new Parkland.











The new Parkland that would extend to 66 hectares would be characterised by enhanced ecological connections, the creation of new habitats, informal and active play all accessed by a permeable footpath/ cycle network. There is an opportunity for enhanced permeability and accessibility to the new country park from the existing communities and beyond to the wider network including the Bristol to Bath cycle-path. The focal point for the park would be the village green at the heart of the site from where lovely views of Kelston Round Hill would be afforded. From here a visitors centre with parking and children's play areas will form the starting point for people from across the region to explore the park. Other landscape interventions include using locally distinctive woodland copses to frame views and an area of public open space in-between the site and an informal open space next to Salford to create a positive relationship with the existing community in the village.

Housing can be positioned to give a positive relationship onto the public open space, giving natural surveillance and animating the edges onto the vibrant parkland. Strong urban edges onto the parkland through outward facing development would define the built limits of the settlement in perpetuity. Parallel to the urban edge strong enclosure of structural tree planting would define the edges of the park greatly enhancing the perception of separation between Keynsham and Salford. This setting would form the permanent separation between the two settlements creating a positive outcome for the community either-side that could be subject to incremental development that would further erode the quality of the landscape and edge condition. Housing in this location would be outwardly facing onto the parkland resolving the current situation where rear gardens face onto the open space.

Housing nearest the Cotswolds AONB would need to be designed to mitigate against landscape and visual impacts. There is an opportunity to develop an innovative and sustainable housing development with low energy housing. The framework plan opposite shows development blocks aligned east west so that in the future individual houses could be designed to maximise their solar efficiency and ensure a good foundation for achieving low energy use.

A permeable network of streets are proposed that would connect through to the allocated land at Keynsham, reducing traffic on the A4 and providing safe foot/ cycle path connections and bus route between the two communities. Furthermore a park and ride facility into Bath is proposed to further reduce car use from the proposed development and its impact on the A4.

Overall the illustrative framework plan demonstrates that 600 new homes with a new parkland of that extends to 66 hectares is immediately deliverable within land under control by Mactaggart and Mickel without any demonstrable impacts on the environment in a sustainable location.

Legend		Urban Interventions	
	Landownership Boundary		1 Loop Road
	Allocated Land		2 Park and Ride 0.5 ha
	Safeguarded Land		3 New roundabout access onto the A4 Bath Road
	Public right of way		4 Low Density housing facing the AONB
	Residential		5 Parkland Edge - Creating Positive Relationship with Park
	Employment		6 Perimeter Blocks
	School		7 Permeable network of streets and connections
	Park and Ride		8 Proposed Primary School
	Park		9 Clear hierarchy of streets and spaces
	1 Railway	Landscape Interventions	
	2 Petrol Station		1 New Country Park
	3 Glenavon Farm		2 Village Green - Views of Kelston Round Hill
	4 Salford Community Association		3 Landscape Breaks
	5 Wellsway School		4 Retained Trees and hedgerows
	6 Chandag Junior School		5 Wetland Habitats
	7 Chandag Infant School		6 Woodland
	8 Salford Primary School		7 Meadows and Grasslands
	Bus Stop		8 Public open space - addressing informal open space
			9 Break in Woodland reinforces gap
			10 Sports Pitches
			11 Children's Play areas



17

5

7

6

8

2

1

6

Minsmere Road



Pixash Lane



Copse Road

3

6

Views of Kelston Round Hill

Wedmore Road

4



Claverton Road

Grange Road

Manor Road

250m

500m

8

10

4

6

2

3

11

6

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The proposals would include 37 hectare of parkland at the heart of the scheme providing a permanent separation between the two settlements and a publicly accessible parkland to the wider community. This parkland combined with the adjacent Manor Road Community Woodland and the site at East Keynsham which has planning permission would provide an overall area of 66 hectares. A park of such a scale would have regional importance and provide a number of tangible benefits to the communities at both Keynsham and Salford.

The focal point of the park would be the Village Green, positioned at the gateway to the site from Keynsham the area of parkland has been aligned with views to the Kelston Round Hill and the supposed route of the Roman road. This site could have a visitors centre and parking providing the setting off point to explore the park and beyond.

A further area of public open space fronts back onto Salford providing a connection with the existing village community that currently use the adjacent are as informal public open space.





- Key
- 1 Village Green- Views of Kelston Round Hill
 - 2 Landscape breaks
 - 5 Public open space
 - 6 Woodland
 - 7 Existing hedgerows and mature trees
 - 8 Wetland habitats
 - 9 Meadows and grasslands
 - 10 Sports pitches
 - 11 Children's play areas

Development Quantum

The quantum of development is listed below, and have been based on average dwellings per hectare, which have been applied across the residential development along the Salford edge. The densities for each parcel can be examined in more detail as the masterplan evolves.



Parcel	Area (ha)	Density(dph)	Number
A	4.08	25	102
B	0.78	50	39
C	1.44	50	72
D	1.43	45	64
E	2.49	45	112
F	1.92	45	86
G	0.52	30	16
H	0.62	30	19
I	2.16	30	65
J	0.84	30	25
Total	16.27		600

Park + Ride	
G	0.5
Total	0.5

- **K** Allocated commercial site: 30,000 m2 floorspace
- **L** Allocated residential site: outline planning application for 250 homes
- **M** 2 Form Entry School site
- **N** Safeguarded land for residential development: 250 homes

Finally

From a place-making perspective the development of land at Saltford presents a compelling case for implementation. Due to the extent of land that is available in a single land holding it is possible to achieve a comprehensive solution for the area as a whole with widespread benefits for the locality and the wider district.

The creation of up to 600 new homes alongside 49 hectares of publicly accessible community parkland provides a very real opportunity to create a truly sustainable extension to an existing neighbourhood in a sensible and sustainable location that relates well to the site at Keynsham East that now has outline planning permission for 250 homes. It also provides a finite strategic gap between Keynsham and Saltford.

For the reasons outlined in this document and in the accompanying representations it is evident that this option warrants further and more detailed scrutiny. The option is both viable substantially and deliverable within the plan period.

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January 8th 2018

Issues and Options

Dear Sir,

I object to the Joint Spatial Plan and BANES Local Plan proposal to build up to 2,500 houses, Park & Ride and Link Road at Whitchurch Village over the planned period 2016-2036. It is unsound.

This figure is hugely detrimental to the area, green belt, air pollution, quality of life, the community of a small village. Other more SUSTAINABLE sites could and should be considered.

The number of houses allocated to our area is disproportionate to other areas or villages or Bath. Where is Bath contributing to this Strategic Need? Many people have to travel from this area to Bath for employment so surely Bath should be contributing more than a small village like ours.

Hicksgate/Brislington Road are only contributing 750 houses. This site should be considered for much more. It is near rail links for travel for employment to Bristol and Bath. It is beside the Ring Road with faster access to the Motorways. It is close to employment, shops, post office, doctors dentists, schools (both senior and junior). The infrastructure is already there. Whitchurch Village cannot provide any of this.

Bristol CC have decided to reject any plans for the intended Arena next to Templemeads. This now must be a prime site and a prime reason for allocating these 2,500 houses, where people can live and work in the City and so reduce car use, pollution, and provide a sustainable and enjoyable location.

Also available within the City is the old Lloyds Bank, High Street, and the Norwich Union Bldg.

Another more appropriate location is Long Ashton, where infrastructure is already in place.

We have given you our thoughts about our village on so many occasions and we have filled in Surveys to demonstrate to you what we are thinking about our area.

98% of respondents wanted the Green Belt retained. It is vitally important to our Village.

88% of respondents voted overwhelmingly for the village to remain a village.

Adding 2,500 homes to the area will destroy the village and it will become a town.

The area has serious constraints regarding travel, employment, schools, shops etc and already the air pollution exceeds the National Guidelines. This is not a sustainable location. See para 14 of the NPPF. 60% of respondents travel to work by car. Multiple car ownership accounts for 97%.

Hicks Gate/Brislington Road can tick all the following points

- Near a Railway Station for commute to either Bristol or Bath for employment
- Beside a significant Ring Road,
- Employment close by
- Schools, both senior and junior
- Near shops/supermarket, Post Office
- Doctor, Dentist

Whitchurch Village cannot tick ANY of these points which demonstrates just how unsuitable this location is for development. Any new 'link' road to Hicksgate would just create more air pollution and noise. A Park & Ride, Link Road and substantial housing development would just create more traffic movements in the area and down an already heavily congested A37 which currently sees long traffic tail backs through the village past the Primary School and across the Whitchurch viaduct back towards town and from the South (Pensford) through our village, and that is without adding the detrimental effect of the 200 houses currently being built on the

Horseworld Visitor Centre land. I find it unbelievable that people who do not live in the area are considering adding 2,500 extra homes and traffic to this existing problem!

The answers below correspond to the questions on the BANES Local Plan 2016-2036 Issues & Options Consultation Winter 2017:

Q 13A Aspirations? : To remain a Village/Community, to preserve the Greenbelt. Not to increase the already choking affect of heavy traffic in the area.

Q13B : To remain a Village/Community

Q14A : Further development in Whitchurch Village will be destroy the village and community.

Q14B : I don't think any of the suggested alternative sites are appropriate. More sustainable site would be Brislington Road/Hicksgate. This site is near the Ring Road, Park and Ride, Rail station for commute to Bath/Bristol, shops, doctors surgery, Schools, Post Office and employment.

14C : Development at the above is near good infrastructure. This lowers car use/mileage and cost to the taxpayer.

14D : Infrastructure at Hicks Gate is already present. Whitchurch Village cannot offer any of the above making it a very unsustainable location.

Q15 : Continue to protect/retain the Green Belt. We have had 3 village surveys over the last 3 years. 98% of respondents want the Green Belt to be retained and for Authorities to use Brownfield Sites or locations with more suitable infrastructure elsewhere.

Q16A : The existing village centre could and should not be enhanced. The Village would no longer be a village. In a recent village survey 88% of respondents wished the Village to remain a village.

Q16B : It will not be possible to integrate. Whitchurch Village will become a town/urban extension, dormitory commuter estate. It will be ruined forever due to the actions of this plan.

Q17A : Green Spaces – the Green Belt at present has many clubs for leisure and the remainder is in agricultural use with footpaths for recreational use. The best option for everyone is to keep it as it is.

Q17B : Maes Knoll stands approx. 800 feet above sea level. It is a very high location on the top of Dundry Hill. It already has footpaths giving access and we use it regularly as it is. There are also footpaths across the fields to Queen Charlton and to Stockwood Vale which are regularly used by walkers in the area. Please keep them as they are.

Q18A : Cycling is dangerous on this route to Keynsham. This can only be made safer for cyclists by widening the roads and having designated cycle paths along the whole route then maybe more people would use them. The current attempts to encourage cycling and safe routes in the area are desultory.

Q18B : You cannot use the bus if there are no services and Bus Companies are independent of Council thoughts and wishes – They are commercial and will provide a service where they want to. The previous attempt to run a service from Keynsham to Imperial Park via Whitchurch was not adequately advertised, not regular enough and too expensive and therefore proved uneconomic.

Q18C : People could be more active if they could walk to work. Provide better and safer cycling routes. Many people do not cycle because of the dangers involved on our ever increasingly busy roads.

Q18D : Nationalise UK Travel, reduce costs of trains and buses. This would require huge investment from central government but it will have to happen at some point. We can't keep building more and more roads and expect air quality, vehicle emissions, greenhouse gases to reduce and quality of life to improve.

Q19 : Suitable employment for the village would be IT based homeworking such as myself. More and more people these days are choosing to or are being forced to work (Companies reducing overheads and costs) from home.

We have been asked for our opinions so many times through your consultations. We have not been listened to but we very much hope you will listen to us now.

Yours sincerely,

Nancy Mathias



December 2017

**JSP in relation to Whitchurch Village and Pensford Village
Consultation Response
Formal Objection**

1. Introduction

I am the BANES elected member representing the above two villages. This is a *formal objection* to the proposals in relation to these two villages.

- This relates to the scale of development proposed for the ancient well-established Whitchurch Village. The proposals will destroy its character and its current status as a village within the Green Belt without sufficient evidence to support such a scale of development.
- The proposals for a Park and Ride will significantly harm Pensford, which is a designated Conservation Area.

This document will outline the reasons for these objections and supply a community-based alternative expansion plan which will not destroy the character of the vibrant Whitchurch Village, but protect the Green Belt and Pensford Conservation Area.

2. Reasons for the objection

The four West of England councils stated that the planning and transportation issues were to be jointly prepared, but as the roads and transportation plans have not been researched, costed nor routes established, the formal consultation re housing is therefore fundamentally flawed because without it there is insufficient evidence in terms of the Green Belt, access to jobs, economic viability and sustainable transportation options in relation to the centres of population.

There are many more appropriate areas in and surrounding Bristol which are adjacent to jobs with easy access to the urban area without the need to spend so much public money on infrastructure costs. The original statements of transportation costs cannot be the justification for the scale of development at Whitchurch Village.

The need for housing relates quite clearly to the City of Bristol because Whitchurch Village is remote from any economic area within BANES.

This area is most unsuitable for development and other locations are more sustainable. It has little economic value (apart from farming), no employment role, does not form any part of the Bristol social scene but it is environmentally important farmland with heritage assets, and of biological importance. The scale of housing and roads suggested would harm the area and not provide any solutions promised.

3. A community alternative?

The proposed JSP scale of development is harmful to Whitchurch village and varies from the presumption of the NPPF for sustainable development. The community, therefore, wish to present an alternative strategic development option using the BANES Council evidence in such a way that it achieves a different outcome.

The village has already worked with developers to welcome the 50% increase in population already approved in the BANES Core Strategy/Placemaking Plan.

A five-fold increase in village size cannot be justified in comparison with other areas within Bristol or adjacent, such as Ashton Vale, Long Ashton, Easton in Gordano, Stockwood, Hicks Gate, Keynsham.

The proposed extra 300 homes expansion within Bath over the 20-year period is insufficient to meet their economic sustainability needs.

All of these locations are more sustainable because of their relations to transport infrastructure and economic/social access to the cities of Bristol and Bath.

Quite clearly the JSP proposals for housing are not the justification for the proposed road system. No evidence is provided in the JSP to justify a southern route to Bristol, the housing assumptions are open to criticism because there is no highway or transportation evidence presented.

Whitchurch village has a need for local GP services, high quality employment opportunities, a general store, additional parking, a better located larger school and road improvements. It can support an different option for strategic sustainable development without the need for expensive roads and such extensive scale of development within the green belt.

4. Core planning principles.

- Whitchurch Village has just agreed its Neighbourhood Development Plan after extensive research, planning scrutiny and a 96.5% community vote in favour. The referendum was held during this JSP consultation process. It is very relevant and of course it is the approved current local plan.. There were challenges by developers during the process because the JSP was under way but the planning inspector

approved the NDplan because it was a relevant local development plan for the community.

Key significant issues are that:

Whitchurch Village is a village;

The green buffer between the city should be safeguarded;

The community overwhelmingly value and use and farm the Green Belt

- The proposals show no creativity to provide jobs, services nor local infrastructure which is being polluted by the excessive north /south traffic on the main A37 road. Placing a dual carriageway road through the proposed development will harm people living there and on the route via noise, congestion and pollution.
- The JSP shows no actual proposals to create any local jobs so any development will create the need for cars to be used to travel to employment urban areas of Bristol, South Bristol, Keynsham and Bath.
- There are other locations closer to jobs and existing infrastructure than Whitchurch Village.
- Whilst the community of Whitchurch have worked closely with developers, the design and delivery of the existing 50% increase has involved no commitment to providing any local services such as GP care, a general store, bus routes nor anything other than standard city estates. More development will not add any of the high design and village amenities that the words suggest. *It will become a city suburb.*
- *The proposals will destroy 300 acres of valued, farmed Green Belt at Whitchurch.* It will add no vitality to the cities of Bristol and Bath.
- Planners have been consistently alerted to the flooding risk from the Dundry plateau, yet have not even chosen to mention that the land shown floods for extensive periods of time during

the year. These are green fields which are farmed, and the proposals will be carbon extensive due mainly to the loss of vegetation, carbon pollution from potential two-car+ households, and the creation of a Park and Ride attracting additional traffic to the area.

- The A37 will become the shortest route from the South Coast ports to the northern motorways so will involve HGV transport increases. *These issues will far outweigh any notional renewable energy schemes which always slip when detailed planning stages are submitted by developers.*
- The proposals will destroy the beautiful untouched Stockwood Vale and the conservation villages of Queen Charlton and Pensford as a direct result of volumes of traffic/ congestion and noise.
- The A37 access to the city is very rural and the development of this scale will create urban sprawl without any justification.
- None of the land is brownfield!
- There are no proposals for mixed use.
- There are no plans to conserve any heritage assets, but the Maes Knoll preservation is fully supported. Any development to the west of the A37 will be wrong.
- Walking and cycling routes to Bristol and Keynsham have been thrown in to satisfy a requirement, but they do not pass any usability test. The distances and the differences in levels between the village and the urban areas are so difficult, the use cannot be the justification for development.
- The village has an incredible active social wellbeing, but virtually no services. Any development has ignored the community need for this, and future plans appear to ignore this as well. Within the 50% increase detailed planning applications, development control planners have stated they have no responsibility for such provision arising from applications. Community infrastructure money goes to BANES Council who do not invest back into such needs.

5. Protecting Green Belt land

The case has not been made for removing this Green Belt land in such large proportions. The Green Belt shown is valuable farmed land and plainly visible from all routes into the village.

Proposals to place a new Park and Ride provision at Hicks Gate at the end of the proposed A37/A4 link remove the need for a separate park and ride provision in the Green Belt in Whitchurch parish. The current proposals show the development to the south east of the village, which is less visually harmful, but its scale will without a doubt give the impression of unrestricted urban sprawl into the countryside. The A37 is heavily used and is polluted but it currently offers one of the most attractive entrances to the city of Bristol. The scale of development proposed cannot be contained without destroying that aspect.

The village has already seen a 50% increase via a strategic development within the previous Green Belt. These houses are being built following close work by the developers with the village. The housing needs of Bristol are acknowledged but so are the cultural and community interests of the village. Creating a small town in the Green Belt is not sensitive to the village setting within the Green Belt. The Green Belt is identified as the Bristol/ Bath Green Belt and the five tests in the NPPF are still relevant for all areas surrounding Bristol; but apart from Bristol /Keynsham, all villages such as Ashton Vale, Long Ashton and Easton in Gordano, which have been excluded on Green Belt terms, fail the “preventing neighbouring towns merging into one another” far more than Whitchurch Village area. They are far more sustainable because they have good transport links to established employment areas within Bristol. The areas of Stockwood Vale, Queen Charlton and Pensford all have special conservation and natural countryside value more than the suburb villages mentioned above.

It is appreciated that developers prefer green sites outside of the urban area, but Whitchurch Village has virtually no jobs and no proper infrastructure. History shows that Whitchurch Village would become a suburb with no infrastructure improvements, no jobs, no public transport and high car ownership.

The NPPF states that Green Belt should only be altered in exceptional circumstances and should endure beyond an approved plan period.

The Green Belt was defined by BANES during its approved Core Strategy / Placemaking plan in 2017. It needs extreme caution and new evidence to change it so soon after this formal approval process. Other commitments given in that plan however have not been delivered such as transportation, bus networks and broad band. The Local Authority apply a district wide approach to Community infrastructure payments allocations so this will not resolve off site issues for the village.

The NPPF says very clearly that the planning authorities should satisfy themselves that that the Green Belt boundaries will not be altered at the end of a development plan period. The Core Strategy/Placemaking Plan approved in 2017 identifies in Policy RA5 the land removed from the Green Belt and the provision of 200+ houses up to 2019.

The Green Belt boundaries should be fixed until 2029 to satisfy the NPPF.

The JSP does not allow for the remoteness of the area from centres of employment as required for sustainable development.

None of the land shown is brown land.

The evidence for protection of key areas in and around the village is supported.

Their evidence shows that all green belt land around the village is extremely vulnerable from development.

6. Infrastructure

The JSP plans show high level transport aspirations and in Policy 7.2, the reference to 2,500 new homes predicts 1,600 homes within the plan period to 2037.

The document refers to Whitchurch in BANES which must assume this is Whitchurch Village its official parish title?

The plan quite rightly includes provision of services arising from the new homes but then at the end quite clearly states that “no dwellings will be completed ahead of the Park and Ride nor the multi-modal link A4- A37-South Bristol including as a pre-requisite the Callington Road scheme being completed”.

Within the JSP the transport infrastructure includes a MetroBus route on the A4/A37 link but no reference to access to the South Bristol jobs area.

No evidence is provided to support the need or delivery of this

Read in conjunction with the NPPF requirements re the 2029 timings, the JSP housing expectations cannot be achieved within the 20-year delivery period to 2037?

How can residents or even developers comment in a creative way with such gaps of evidence left open?

If the link road, or the MetroBus or Callington Road or the Park and Ride do not happen, then the JSP becomes unachievable? This issue needs to be carefully examined.

The arguments for the Park and Ride, for example, are very open to challenge, and if successful the JSP housing assumptions would fall.

The vague reference to pedestrian and cycle routes links to key services is another throw away comment, which is neither practical nor likely to be provided off location by any developer or WECA.

Local survey data recorded less than 1% infrequently or occasionally ride to work.

The key JSP diagram fails to even show a Metrobus route on the A37/A4 link road.

The major fault in the JSP consultation is the total lack of evidence for the infrastructure that the development is dependent upon.

Developers will identify this fault and the remaining biggest risk is that development takes place without the infrastructure promises being met.

No transportation impact study, nor origin and destination research, has been shown for the various infrastructure proposals, nor the knock-on impact for the villages of Pensford, Clutton, Temple Cloud and Farrington Gurney. The increase in traffic flows will be significant, yet no reference is even made to the increased pollution and congestion in these small villages.

The creation of a link from Keynsham to Whitchurch Village and locating a Park and Ride in the countryside will inevitably attract more vehicles from the congested A4 into Whitchurch and Pensford. It is essential, therefore that Policy 7.2 needs to have added “the A4 road improvements shall be completed before any new homes are completed”.

7. Formal objection summary

As the BANES councillor representing Whitchurch Village and Pensford, I wish to record my formal objection to the JSP for the following reasons:

- The housing identified is on the basis of a new A37/A4 link road being built, but no details in the consultation documents

have been provided to justify the need, the cost nor the location of such a road?

- The JSP plan is flawed because it relies upon infrastructure improvements, but no evidence is provided to justify these.
- The proposed housing development figures are not consistent with the ability of a long-established stable village to grow into a small town.
- The area is not sustainably suitable in terms of the NPPF definitions.
- There is no evidence that the size of development will add any economic value to BANES, its host area.
- The location means that car usage will inevitably grow by approximately 5,000 cars and this will add to congestion and air pollution on surrounding areas.
- The A37/A4 link will directly increase HGV traffic through Pensford and Whitchurch Village because it will become the shortest route from the South Coast ports of Poole and Weymouth to the north-travelling motorway system.
- The A37/A4 route will increase traffic into the area unless the A4 improvements are completed first.
- The A37/ South Bristol route will make the A37 the shortest route to Bristol Airport from the South of England and this will increase traffic flows, congestion and pollution through Pensford. It will also make a main arterial route through a housing estate suburb of Bristol.
- The proposals for a Green Belt loss for a park and ride is not justified. If a new link to the A4 is established, then the new Park and Ride at Hicks Gate will remove the need for an A37 park and ride.
- A Park and Ride (at Whitchurch) would add to the enormous traffic problems being experienced by the conservation village of Pensford. It may help the City of Bristol but there is no acknowledgement of its impacts on the rural area.
- The loss of Green Belt is not justified in NPPF terms within the approved formal JSP period applicable to 2029. The ability to

construct the volume of housing proposed post that date is therefore not feasible.

- The area is the most attractive unspoilt route into the City of Bristol. As planned, the area would be highly visible, un acceptable urban sprawl.
- There are other less significant areas of Green Belt around the city where development proposals have not been allocated that should be considered before Whitchurch Village. Evidence will be provided to suggest these areas are considered first.
- The spread of new proposed housing areas over the BANES boundary is biased against Whitchurch Village (500% growth) versus the City of Bath (0.003% growth) which is the prime economic area of B&NES. This seems impossible to justify. Rural areas have no strategic growth at all, just opportunity sites. This is not healthy for the rural economy. It is not a balanced approach to the JSP planning.
- The green buffer gap between the village and the city should be safeguarded as an absolute long-term essential.

The village has recently seen a successful 50% growth, so this is not a 'NIMBY' response. It is an argument that the evidence should be used to plan a sensible strategic expansion without the need for extensive loss of sensitive Green Belt, significant highway costs, an unproven need for a Park and Ride and unsustainable home development in a less than suitable area.

8. Area evidence

Whitchurch Village will have approximately 650 homes when the Core Strategy plans are completed by 2029.

The very recently approved Neighbourhood Development Plan (NDP) acknowledged the JSP process and establishes some key principles for future development based upon local approved research:

- That the village is a village;
- The green buffer should remain without change; (safeguarded)

- The village is within valued and valuable Green Belt
- In evidence terms, the south east of the village (away from the A37) would have the least urban sprawl impact and ability to have minimum community impact.

Local evidence not used in the JSP?

The Neighbourhood Plan team commissioned research from the local historic society, a travel to work survey, housing needs survey, listed buildings survey, employment within the village survey, local flooding survey, bio-diversity survey, detailed village character assessment and official census data. None of this information appears to have been used in the evidence for the plan.

The NDP deliver the approved BANES Core Strategy Green Belt analysis related to the period up to 2029. This was submitted by BANES and approved by an independent inspector in 2017.

Referring to the BANES landscape and visual evidence.

Areas 4a, part 2 away from Staunton Lane, 3, 4b and land adjoining the Stockwood dense housing areas, could take a level of development capable of sustaining a new school, GP surgery and village shop. This would therefore release the existing primary school site for housing or employment development and make the school more suitable for Whitchurch Village children. It would also relieve the Bristol-facing healthcare inconsistencies for existing residents (if they so decide). Healthcare is provided outside of the BANES CCG area.

The Village NDP will inform the Local Plan process arising from the JSP.

This would reduce any need for the dual carriageway to be built through Stockwood Vale.

Referring to the heritage asset study and historic environment appraisal.

The JSP evidence appendix highlights the significant risk to heritage assets and historic architectural assets. The implied low-risk areas in the north west and north east of the village do not reflect the local research re the viaduct and the significance of the historic site of Manor Farm.

It is noted that the report clearly shows that the land suggested for development by BANES Council is medium high risk and is therefore not suitable for significant development.

Referring to flooding evidence.

None has been supplied in the JSP.

Photos and testament will be provided. Substantial areas of flooding of the JSP land has taken place for many years. Possibly this is not recorded because it is farmed land, but the developers for the 200 new homes currently being built in Whitchurch are experiencing major problems.

Referring to the Green Belt.

The council refer to the NPPF. Following a formal Arup Green Belt assessment undertaken to inform their adopted Core Strategy.

Clause 54 .

There is a requirement to provide affordable homes but the approved Core Strategy 200+ plus houses at Horse World which has a 40% affordable housing requirement exceeds the need from the village.

Clause 85

Provides the opportunity to safeguard the green buffer land between the village and the City of Bristol

This evidence therefore does not take into account the Green Belt boundary has been established by formal examination and approved Core Strategy to apply until 2029, that the green buffer in the NDP can be protected long term and that there is no evidenced BANES local affordable housing need that has not been met by the existing plan.

The location has no employment no public transport and cannot add in any way to the vibrancy of Bristol or Bath.

Clause 88.

states that “LAs should ensure that substantial weight is given to any harm to the Green Belt”. None of the evidence supports this by my analysis.

The NPPF emphasis is in support of existing Green belts and insufficient evidence has been provided for the scale of destruction proposed.

The Green Belt arguments for changing its boundaries are flawed.

9. A case for alternative strategic development?

Whitchurch Villagers do recognise the need for strategic housing in the West of England area, but argue that the scale and harm to their environment via urban sprawl is not appropriate in such a vibrant well-established village.

In a 20-year period post the current 50% plus growth already planned in the village up to 2029 will leave further scope for reasonable strategic development up to the 2037 end date. The village could probably expand to double its size and retain its nature, reduce the harm to the Green Belt, achieve vital missing services and achieve greater sustainability by making a dedicated employment zone for high quality jobs to meet a more balanced village employment need.

This would not require the harmful and costly dual carriageway and expensive MetroBus system mentioned in the JSP, but it could be provided in such a way that it could allow for such transportation infrastructure to take place, but not be dependent upon it.

There would need to be specific highway off-site works to facilitate greater demand, but the key would be sustainable local employment and relocating the village school away from the main A37 route to ease congestion. These would include works to improve A37 junctions and alternative routes through the City of Bristol.

Our proposal will satisfy all the Local Plan questions.

- Keeps the village as a village
- Safeguards the Green Belt area between the city and the village
- Gives specific details of employment needs for the village
- Sees the relocation of the local primary school to meet the needs of the village
- Sets out a commercial case for a village mini-supermarket.
- Greater delivery of BANES CCG healthcare to the village
- Revised bus routing to the economic areas of Bristol, Bath and Keynsham.
- Delivery of highways upgrades to facilitate growth in Whitchurch Village and Keynsham town.
- Deletion of the proposed Park and Ride or position it to the other side of Pensford village.
- Protects Maes Knoll, Queen Charlton involves an extension of the Stockwood area, protects the lovely Stockwood Vale and most importantly stops the urban sprawl of the current proposals.

10. Conclusion

The proposals for the JSP are flawed.

A detailed objection has been provided together with a sensitive village expansion alternative that meets the strict guidance of the NPPF.

To avoid inter community conflict, very little case has been made for the more suitable, sustainable, cost effective sites elsewhere in the West of England area.

This document has been prepared following a public meeting with the community of Whitchurch Village, its Village Council and the active NDP group.

Councillor Paul May
29/12/2017

Councillor Paul May
Whitchurch Village and Pensford village
Formal objection. January 2018.
Executive Front cover.

NPPF PARA 182 TEST OF SOUNDNESS

Positively prepared – the plan should be prepared based 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;

- Whilst the need to plan positively across the sub-region to respond to the overall housing requirement is understood, the proposal for 2,500 houses at Whitchurch is neither reasonable nor consistent with sustainable development for the reasons set out below.
- There is a failure of consistency between the four UAs and within the Banes area for the location of sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

- The Plan and background evidence do not demonstrate that strategic development at Whitchurch is the most appropriate strategy. There are other locations surrounding Bristol and within Banes which have better access to the jobs, facilities and infrastructure in the urban areas without the need for such a substantial public investment in infrastructure. Other locations are therefore more sustainable.
- Whitchurch is presented as sustainable because it is an urban extension to Bristol when in reality it is not adjacent to the Bristol urban area. It is a well established 12c Vibrant, small village which is isolated from Bristol City and Bath City with limited employment, facilities and services on a heavily congested and polluted road that can sustain no more traffic.
- The case for removing such a large area from the Green Belt has not been adequately evidenced and demonstrated. The Council's case appears to rest on the scale of the need for housing which does not constitute the exceptional circumstances required to change the Green Belt as required in the NPPF. The Government has set a very high bar to removing land from the Green Belt which was tightened in the 2017 White Paper. By the JSP 's own evidence , the proposal would significantly contradict the purposes of the Green Belt resulting in unrestricted

sprawl and severe encroachment into the countryside. All of the land is farmed and there is no brown land.

- The village has a strong social infrastructure and does not actively contribute to the city social scene.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities;

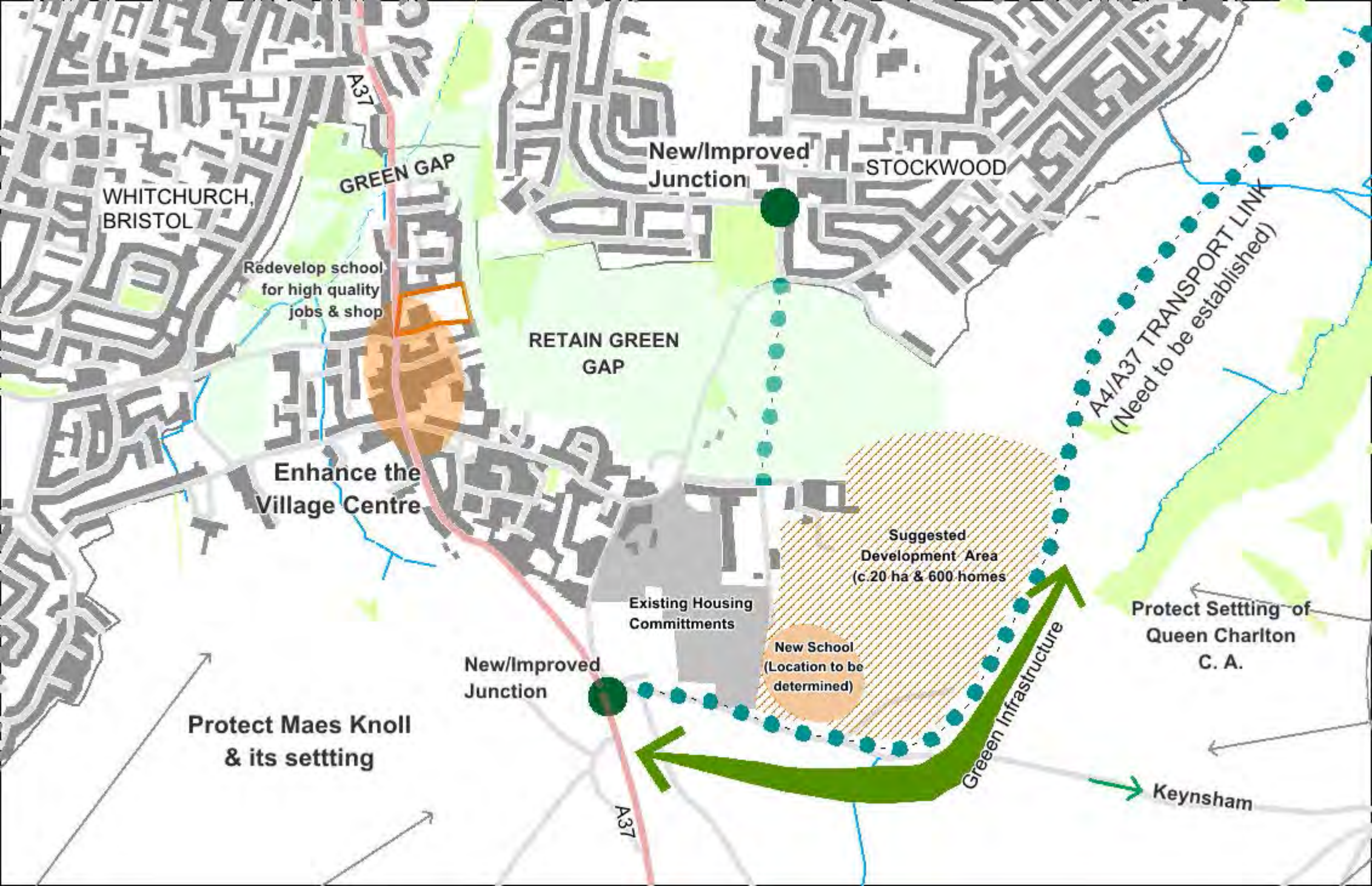
- The proposal relies on substantial new transport infrastructure but these have not been researched, costed nor routes established. The deliverability of this SDL is therefore seriously in doubt and flawed because the development projections are not linked to any evidenced infrastructure data.
- The reliance on pedestrian and cycle route links to key services is neither practical nor deliverable. Local survey data recorded less than 1% of the working population either infrequently or occasionally ride to work. The terrain is hostile for any regular use.
- The cross boundary relationship of the SDL to the urban area of Bristol is unclear and this almost entirely residential proposal will not address the deprivation of south Bristol, contrary to the JSP's own objectives. Access to employment in the urban areas will not be achievable based upon absent infrastructure data.
- There is also inconsistency between the constituent parts of the JSP in terms of which locations have been selected and how the Green Belt has been treated.
- The further change to the Green Belt especially so soon after the Core Strategy was adopted (up to 2029) undermines the permanent nature of the Green Belt.
- The infrastructure strengths in other more sustainable areas with significantly easier access to employment and urban centres have been ignored in choosing Whitchurch Village as a SDL.

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

- The Plan is inconsistent with the NPP for the above reasons, and also because it would cause substantial and unjustified harm to a highly sensitive environment including agricultural land, heritage assets, ecology and rural landscapes.

What is need to make the plan sound

In order to make the Plan sounds, the SDL should be substantially scaled back as set out in this representation to no more than 600 new homes which requires a more deliverable scale of infrastructure include high quality employment much needed services delivered and highway improvements rather than unsubstantiated, costly new JSP infrastructure.



-----Original Message-----

From: Mary Meacham

Sent: 09 January 2018 11:38

To: Local Plan

Subject: local plan

I would like to comment on the local plan for the consultation period ending 10th January 2018.

I do not think that such a large development of housing should be made at Whitchurch on this area of green belt land. It will totally change the character of a quiet and rural area, with lanes and footpaths which are enjoyed by many locals for walking, cycling and jogging.

New residents may be looked after, but existing residents will have their lives profoundly affected in a negative way by pollution both from lighting and traffic noise, air pollution and loss of open space.

The plans include a proposal to build a multi modal link from the A37 to the A4. The route indicated will pass very close to Stockwood. To build such a road so close to a large, settled and quiet residential area seems to go against any vision of preserving the identity of places and the well being of residents. Any such road would cause noise and air pollution. It would also be a barrier to the residents of Stockwood to access the lanes and footpaths of the countryside for cycling and jogging in the quiet lanes, and walking on the footpaths. It will bring more traffic into Stockwood, and any restrictions to stop this will also restrict Stockwood residents exiting the area.

The road would severely restrict the current easy and direct access for Stockwood residents to Queen Charlton, and the surrounding villages such as Wollard and Compton Dando etc for walking, and to Keynsham and all of its facilities.

Access to the golf club, two garden centres and other amenities would be adversely affected. The route indicated is currently green belt. There is abundant wildlife, with many species of birds including jay, woodpecker, buzzards, owls, heron, long tailed tits, and many more. There are also bats, foxes and deer. There are also many old hedgerows and trees. There are also popular and well established allotments.

It seems profoundly unfair to build a road so close to residents who have lived in a quiet place for many years, or to those who have chosen to move here more recently to be in the quiet environment that exists now.

The vast amount of money required for this road would be better spent on improving and maintaining existing roads, and finding solutions to problems such as lorries negotiating Pensford and Temple Cloud on the A37.

These plans, describing a good quality of life within new developments, seem to totally disregard the profound negative affect on the quality of life of the existing population in the area.

I would be grateful to receive confirmation of receipt of this email, and that it has been received within the consultation period.

Many thanks

Mary Meacham

From: Sestini, Andre [mailto:Andre.Sestini@mendip.gov.uk]
Sent: 10 January 2018 22:01
To: Local Plan
Subject: [OFFICIAL] B&NES Issues and Options Consultation

Mendip District Council note that the main focus of the Issues & Options consultation on the Local Plan for Bath and North East Somerset is establishing how the non-strategic growth of approximately 700 homes will be delivered.

As such Mendip District Council note the proposed three options for planning this non-strategic growth and welcome future dialogue on any potential future developments in the Midsomer Norton, Radstock, Westfield area.

Mendip expects to continue ongoing dialogue with Bath & North East Somerset on cross boundary issues under the Duty to Co-operate.

We would like to draw attention to our Local Plan Part II: Sites & Policies Document which is currently out for Pre-Submission Consultation

Andre Sestini
Principal Planning Policy Officer
Mendip District Council
Council Offices, Cannards Grave Road, Shepton Mallet,
Somerset, BA4 5BT

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Customer Services: 0300 303 8588
E-mail: andre.sestini@mendip.gov.uk
Direct Line: 01749 341538

From: town clerk [mailto:townclerk@midsomernortontowncouncil.co.uk]
Sent: 10 January 2018 10:50
To: Local Plan
Subject: Comments from Midsomer Norton Town Council

At its Full Council Meeting on 8th January 2018 the Council resolved that I send the following:

Q1 Page 4 Have we identified the critical issues facing the district over the next 20 years?

Yes, particularly the traffic congestion concern and the poor accessibility to the national/regional transport network for the Somer Valley area.

Q2 Page 5 Are the suggested spatial priorities the right ones?

Yes, especially the policy to supply business land and premises in sustainable locations... focusing on the Bath and Somer Valley Enterprise Zone.

Q3 Page 11 Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth (about 700 dwellings)? Please give reasons for your answer.

Scenario 1: Existing hierarchical approach (sustainable locations outside the Green Belt, e.g. Keynsham, Midsomer Norton, Radstock and Westfield) This contradicts the priority to reduce the need to travel. The hierarchical approach boils down to not building on the Green Belt. This approach is outdated in the opinion of the Council. Green Belt locations should be considered at an earlier stage, and the 'exceptional circumstances' justification should be used more readily.

Scenario 2: Focussed approach (A few key locations, e.g. edge of towns, large villages) This would change the character of the chosen locations, and again the exclusion of Green Belt locations distorts the picture.

Scenario 3: Dispersed approach – small developments. This increases the need to travel, contrary to the policy to reduce private car use.

The Council has difficulties agreeing with any of these options for the reasons above.

Q4 Are there any other approaches/scenarios you think should be considered for accommodating non-strategic growth in B&NES? Please give reasons for your answer.

Yes. We would prefer Option 1 in that it favours sustainable locations, but do not agree with the hierarchical approach which in effect does not look at the Green Belt until non-Green Belt possibilities have been exhausted. We think that Green Belt locations should be considered at an earlier stage, and the 'exceptional circumstances' argument should be used more readily, especially if central government makes it legally easier.

Kind regards

Clive Stilwell

Clive Stilwell MILCM

Town Clerk

Midsomer Norton Town Council

Tel: 01761 418701

E mail: townclerk@midsomernortontowncouncil.co.uk

Web Site: www.midsomernortontowncouncil.co.uk

From: Jane Moore [REDACTED]
Sent: 03 January 2018 12:26
To: Local Plan
Subject: Regarding the proposal for Whitchurch and Keynsham

I am writing regarding the proposals for homes and transport in and around Whitchurch.

The proposal to build large number of new homes will impact on Whitchurch Village and will impact on the villages nearby

- The village will become a small town and the infrastructure doesn't support the proposed scale of new build
- There would be increased traffic along the A37, in places the road is clearly not suitable for the current level/type of traffic and this would only be made worse (see photographs)
- The plans involve building on green belt land; this is not only a lazy approach it is a high risk approach as it increases the issues with flooding, removes trees that absorb carbon, impacts on the recreation for families, increases pollution which puts our health and wellbeing at risk

The proposal for a Park & Ride probable seems a good idea if you live the other side of the A37 or if you don't live near the area at all. However,

- The introduction of a Park & Ride without addressing the current risks on the A37 in Pensford will only exasperate the problems and the risks
- More traffic will use the A37 to get into and out of Bristol, the A37 in Pensford is already dangerous. On a regular basis the road is closed because of accidents or because vehicles have blocked the road. Lots of cars sat idle pumping dangerous chemicals into the atmosphere. The risk to life is significant, either in the accidents themselves, children walking down the road (see the bollard that has been knocked over) and from pollution
- It is acknowledged that a Park & Ride would alleviate the traffic into Bristol which is also a concern but this cannot be to the detriment of the residents who live South of the proposed site and it cannot result in an increased risk to health, wellbeing and life. If the Park & Ride is to be built a new road needs to be built that bypasses Pensford completely. Nobody has the right to endanger people's lives simply to make commuting easier for others



There is a need for more housing and a need to address the congestion but this needs to be done with care for the environment and for existing residents. There is land that has been previously developed and is no-longer being used and this land should be developed first (even if it is more expensive). Retail Parks should have to include some residential property e.g. Imperial Park, Cabot Circus; the A36 offers a number of options (and there is already a Park & Ride nearby plus the road is much wider and there are a lot less pedestrians using that stretch of road e.g. Weston Lock through to where the A36 joins the A4.

Jane Moore Resident of Pensford