

10th January 2018

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

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Sent by E-mail

Dear Sir / Madam

Consultation Response to Local Plan 2016 – 2036: Issues and Options

This letter and the accompanying representations are submitted to the public consultation in respect of the Bath and North East Somerset (BANES) Council Local Plan 2016 – 2036: Issues and Options Part A (Winter 2017) Document.

Overview

We are pleased to see that the Council is drafting a new Local Plan which, once adopted, will replace the existing adopted Core Strategy and Placemaking Plan and guide development in the district up to 2036.

Support is also given to the emerging Local Plan being informed by a regional context, through the emerging West of England Joint Spatial Plan (JSP).

Land interest at High Littleton

We own two parcels of land within High Littleton; Land at Church Farm (Site A) and Land off Aumery Gardens (Site B), herein referred to as 'the site' and write in this respect. The extent of this land ownership is outlined on the plan at Appendix 1. The site is identified in the Housing and Economic Land Availability Assessment that forms a background document to emerging Local Plan, identified under references HTN5 and HTN6C.

Delivery of new housing at High Littleton is currently restricted by the lack of capacity at the local primary school. The site is ideally placed to resolve the capacity constraints by delivering an expansion of the primary school as part of any development proposal; both in terms of the ability to provide land to increase the size of the school and in respect of the practical delivery of the works (including the expansion of the number of class rooms on site) while the existing building continues to operate.

The development potential of the site has been explored and no technical constraints have been identified that would prevent delivery of a residential scheme.

The potential of the site is considered in detail in the 'Site Submission' enclosed.

Summary

Representations and a Site Submission are enclosed to assist the Council in preparing the next stage of the Local Plan. Should any further information be required, please do not hesitate to contact us.

Yours sincerely

Messrs Pera

Enc.

Site Location Plan
Illustrative Master Plan

Response to BANES Local Plan Options Stage 1a document

The Options Stage document identifies the need to review the vision and strategic objectives for the district in light of changes, including among other factors, changes in national context and the need to align with the JSP. Our responses to key questions raised within this document are set out below.

Consultation Q.1: Have we identified the critical issues facing the District over the next 20 years?

A key priority for the district up to 2036 is ensuring that BANES has a strong economy and appropriate levels of growth. The appropriate delivery of new homes and jobs to meet this priority is supported.

A critical issue for the district is ensuring that anticipated changes to the local population, in terms of growth in overall numbers and how that population should be distributed, is carefully considered and the implication for housing need is addressed through housing allocations. In this context we support the identification of the need to plan for a delivery of sufficient homes to meet increasing needs as one of the key spatial priorities.

Question Q.3: Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth? Please give reasons for your answer.

In response to Question 3, in order to ensure development is delivered in sustainable locations, residential development at villages should be delivered commensurate to its scale and relative to available facilities and services. This ensures housing needs of those smaller settlements are met locally, but at a level that it's facilities and services can sustain.

Page 10 of the document illustrates BANES JSP requirement for 700 dwellings to be delivered in non-strategic locations, including rural areas. Diagram 6 identifies High Littleton as a village with moderate access to key services and facilities and public transport provision, with the primary school soon to be at capacity with no scope to expand. It is evident in Diagram 7 that the majority of the district's villages are covered by Green Belt, with the exception of High Littleton and other villages to the south.

Diagram 8 is unclear and there is a lack of clarity which settlements or villages the diagram relates to. Further information is required on what the diagram shows to allow us to comment on which scenario best addresses the non-strategic growth need.

Response to Access to Services and Facilities in the Rural Areas Background Paper

Pages 3 and 9 of the document focus on primary school capacity and the critical need to address the capacity in rural areas.

The document states that lack of primary school infrastructure, unless remedied, could have a significant impact on whether further residential development can be accommodated even in settlements with a 'broad' level of services and facilities.

We recognise this issue and the need to rectify it in order for residential development to be delivered in sustainable villages and meet the district's housing needs.

We understand that High Littleton Primary School is currently at full capacity, and as a result, no residential development can be delivered in the village, and this is something any future residential proposals in the village will need to consider and address.

Site Submission: Land at Church Farm and Land off Aumery Gardens, High Littleton

As outlined in the Options Stage 1a document, BANES has a requirement to deliver 700 dwellings in non-strategic locations as part of the JSP. Many of the settlements within BANES that represent non-strategic locations are the subject of designations that constrain development opportunities. This includes the Green Belt which covers significant parts of the north of the authority's area. Settlements not the subject of such constraints should be considered for their development potential to help in meeting the 700 dwelling requirement.

High Littleton is identified in the consultation documents as a settlement with a moderate range of services and facilities, and is one of the few villages in the district not located within the Green Belt. As such, High Littleton is considered to represent an appropriate focus for, as a minimum, balanced residential growth to meet the housing needs within the locality.

As identified in the 'Access to Services and Facilities in the Rural Areas' background paper, a lack of capacity at primary schools in rural areas can hinder the delivery of residential development. This has been the case at High Littleton in recent years and therefore it will be necessary for any development proposal to address the lack of capacity at High Littleton Primary School to ensure that the scheme is genuinely deliverable.

Land at Church Farm and Land off Aumery Gardens (Sites A and B respectively, as shown on the plan at Appendix 1 which accompanies these representations) comprise approximately 4.3ha of land. It is in the ownership of the Pera family and is available for development.

The land at Church Farm is located adjacent to High Littleton Primary School and represents the only reasonable option for the expansion of the current school site (the school site is constrained to the opposite side by the existing buildings and land uses, including the village grave yard). It is suitable and available to facilitate the expansion of the school, which would be brought forward in line with residential development to allow High Littleton to meet its demand for housing. The increase in capacity at the primary school will be delivered through an extension and improvement of the existing facilities, including the delivery of new classrooms (two additional class rooms would allow the school to achieve a full single form entry school, and improve facilities for pupils and staff, and this need was identified during initial discussions with the school).

In addition to the delivery of the expanded school, the two sites have the potential to deliver up to 75 dwellings, as shown within the Illustrative Masterplan attached at Appendix 2. The locations are within close proximity to the existing services and facilities of the village and there are no known technical matters that would prevent delivery of a residential proposal at the site. The site is not affected by any landscape or ecological designations, and the Illustrative Masterplan indicates how a scheme could be brought forward that is sensitive to the rural setting of the village.

There is a Grade II Listed Building within Site A, known as Church Farm Farmhouse. This building fronts onto the main road running through the village (the A39) and is in a dilapidated state. It is understood that the need to restore the building and bring it back into an active use is a key desire of the local community, and this restoration would form a central part of (and be funded by) a development proposal for Sites A and B.

In summary, a development at these sites would have good access to services and facilities and provide the opportunity for enhancement of the facilities at the local primary school.

Furthermore, it is available, and the scale and nature of the development proposed is both achievable and deliverable.

It is understood that the sites were identified in the Housing and Economic Land Availability Assessment under references HTN5 and HTN6C as part of the local plan preparation, and will be considered in detail as the local plan evolves. In this context, it is our intention to advance detailed discussions with the Local Planning Authority and the wider community regarding the detail of the proposals to be able to provide officers with confidence regarding the schemes detail and the ability to deliver within reasonable timescales.

Appendix 1: Site Location Plan



Appendix 2: Illustrative Masterplan



Site B - Sketch Section

Bath and North East Somerset Local Plan 2016-2036

Issues and Options Consultation

Comments on Behalf of Persimmon Homes Severn Valley

This document sets out the comments of Persimmon Homes Severn Valley (PHSV) on the Issues and Options consultation of the Bath and North East Somerset Local Plan 2016-2036.

1. Vision and Spatial Priorities

- 1.1 We support the definition of a simpler vision than that set out in the Core Strategy, particularly given the context now provided by the Joint Spatial Plan. However the vision appears to be to Bath centric and needs to make specific reference to the rural areas and Keynsham.

2. Critical Issues

- 2.1 Housing issues should address more than affordability and lack of social housing, particularly as the significant increase projected in younger and older age groups will in general require market housing rather than social housing.

3. Spatial Priorities

- 3.1 Spatial Priority 4 is fine, but sustainability appraisal objective 2 then introduces a reference to affordable housing. The term '*affordable housing*' has a particular meaning and is defined in NPPF glossary and relates to specific affordable housing tenures. It is important the objective applies to all tenures, including market housing, in accordance with the JSP sustainability appraisal objective 2b '*to deliver a suitable mix of high quality housing types and tenures (including affordable housing) for all parts of society . . .*'

4. Joint Spatial Plan

- 4.1 It is right to acknowledge that the JSP could be amended through the examination process, particularly as we are aware there are significant objections to the overall housing numbers and the strategic development locations. The Local Plan must meet the strategic requirements of the JSP, but it is unlikely that the JSP will be resolved to meet the Local Plan programme and enable a draft plan to be published in autumn 2018.

- 4.2 In any event diagram 3 shows the make-up of the JSP housing requirement which assumes all the housing from all the sources will be delivered. That is unlikely and the plan should include a suitable flexibility allowance and/or reserve sites in order to ensure sufficient numbers are delivered. Whether additional numbers are required to meet deficiencies in the JSP housing numbers or to provide flexibility in Bath and North East Somerset, given the limited potential for additional SDLs in BANES these requirements are likely to be met through non-strategic locations. In that respect we consider:

1. It is important to maximise locations at the urban areas;
2. Based on the strategic in previous Local Plans, there is scope to release non-strategic Green Belt sites at Keynsham;
3. Green Belt releases in villages should not be proposed.

- 4.3 There we support a hybrid approach embracing options 1 and 2 consisting of a hierarchical approach specifying focussed locations, in the expectation that numbers will increase. Dispersed growth is unsustainable.

5. Keynsham

- 5.1 Persimmon Homes Severn Valley control land west of Charlton Road opposite land which was granted planning permission for 100 dwellings (15/04290/FUL). We consider the identification of land north of Keynsham in Policy 7.1 results in a fragmented development area divided by the railway line which itself contributes to the urban sprawl of Keynsham. The result is that it reduces the Green Belt gap between Keynsham and Saltford to two narrow fields. The impact of this reduction would be clearly visible from both the railway line and the A4.
- 5.2 The loss of the gap between Keynsham and Saltford is a complete reversal of the previous longstanding approach and contrary to the Core Strategy where table 8 sets out the purposes of including land within the Green Belt in Bath and North East Somerset, which includes '*to prevent the merging of Bristol, Keynsham, Saltford and Bath.*' This was based on evidence from the September 2013 BANES Green Belt Review by Arup which specifically included a Local Green Belt purpose to protect the identity and setting of villages, although this assessment assessed much smaller settlements to the east of Keynsham. Even so when assessed the option of development between Keynsham and Saltford was rejected as it would constitute the further eastward spread of Keynsham towards Saltford. There is no viability appraisal of the proposed SDL in the JSP and Diagram 9 in the consultation document now includes a number of railway crossings which will further impact viability and deliverability.
- 5.3 Clearly Keynsham should accommodate more development, but it is heavily constrained and all areas immediately adjoining the built up area contribute towards meeting one of more Green Belt purposes. Therefore compromise is necessary. The past approach has been to allow smaller incremental changes to the Green Belt boundary at Keynsham and we consider that approach should continue. At the very best the impact of the proposed strategic development location on the narrow gap between Keynsham and Saltford should be reduced by substituting part of the land proposed for development with other locations including land west of Charlton Road.
- 5.4 Previous assessment in two Local Plans which has resulted in the allocations of sites K2 and KE4 to the south west of Keynsham. We consider there is an opportunity to complete developments south west of Keynsham, provide a Charlton Road gateway into the town and provide a less hard urban edge to the south and west of the town as illustrated more detail in the document attached with this response.

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Strategic Land Director

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10th January 2018

Land West of Charlton Road, South Keynsham

Persimmon Homes
Severn Valley





Site

Keynsham

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Section 1: Introduction

Vision

1.1 To achieve the allocation of land West of Charlton Road, Keynsham controlled by Persimmon Homes Severn Valley as identified on the plan.

Aims

1.2 To support the identification of Keynsham as a strategic development location and focus for growth in the Review of the Bath and North East Somerset Core Strategy.

1.3 To identify land West of Charlton Road as part of a sustainable extension to Keynsham, and thus released from Green Belt.

1.4 To demonstrate the deliverability of the land and provide the basis for the subsequent allocation of the land in the Joint Spatial Plan and Bath and North East Somerset Local Plan 2016-2036.





Site

**Barratt Homes and
David Wilson
Homes**

14/00049/FUL

Granted 5th February 2015

**Greenhill Farm
Phase 1**

15/04290/FUL

Granted 2nd Nov 2017

Bloor Homes

16/02077/FUL
Granted 18th
August
2017

Section 2: Policy Context

NPPF

2.1 The National Planning Framework was published on 27th March 2012 as a key material consideration in the determination of planning applications. The document is an integral part of the Government's aim to make the planning system less complex and more accessible, to protect the environment and to provide a more streamlined mechanism that delivers the Coalition's pro-growth strategy. The following items constitute a brief summary of the Framework's key messages.

Para 7

- Sets out 3 dimensions to achieving sustainable development:

Economic, Social, Environmental

Para 14

- Establishes a presumption in favour of sustainable development.
- Local Planning Authorities should positively seek opportunities to meet the development needs of their area.

Para 16

- Local planning authorities need to update and produce local plans that are in conformity with the NPPF to retain control over shaping and controlling development in their own areas.

Para 17

- Sets out 12 Core Planning Principles.
- Every effort should be made objectively to identify and then meet the housing, business and other needs of an area.
- Focus significant developments in locations which are or can be made sustainable.

Para 47

- A key requirement for local authorities is to boost significantly their supply of housing.

Para 54

- Authorities should be responsive to local circumstances specifically in rural areas where market housing can secure affordable housing needs.



Current Planning Policy

2.2 The Bath and North East Somerset (BANES) Core strategy was formally adopted on 10th July 2014.

2.3 The Core Strategy identifies total housing needs of 12,960 and 2,150 in Keynsham. The District wide spatial strategy (Policy DW2) is to focus new housing and jobs in 3 areas of Bath, Keynsham and the Somer Valley.

2.4 The strategy retains the general extent of the Green Belt but removes land in 4 areas, 2 in Keynsham including South West Keynsham adjacent to this land.

West of Charlton Road, Keynsham

2.5 The site is located in a strategic development location Town in BANES. Utilisation of the site for residential development will:



- Create a built environment that facilitates social integration and inclusive communities;
- Increase economic benefits through increased spending, construction jobs, section 106 contributions and government new homes bonus;
- Deliver landscaping improvements to support wildlife and SuDs to mitigate site drainage.

2.6 Therefore the inclusion of land West of Charlton Road, Keynsham in the new Local Plan would be fully compliant with the 3 dimensions of sustainable development.

The planning system must do all that it can to support sustainable economic growth. The proposed site could support sustainable economic growth by providing construction jobs, delivering increased investment and expenditure.

The NPPF advises that full account should be taken of market signals to ensure the availability and deliverability of housing sites. Persimmon Homes consider this deliverability statement as proof of our intent to deliver high quality housing.

This document also demonstrates that Keynsham is a sustainable location where development West of Charlton Road will help to maintain existing facilities so that it is in accordance with NPPF Para 17.

2.7 A substantial change in the status and deliverability of the land results from Persimmon Homes Severn Valley acquiring an interest through an option agreement.

Section 3: Historic Pattern of Growth

3.1 Keynsham is a historic market town dating from Roman times, and listed in the Domesday Book as *Cainesham*. It is strategically located next to the A4 linking Bristol and Bath and it also benefits from a station on the main Bristol to London rail line.

3.2 The town expanded rapidly in the 1950's and 1960's to its current population of about 15,500. Throughout its history Keynsham has remained an important trading, political, administration and manufacturing centre and today it enjoys a thriving high street.

3.3 During 2010s around £34 million was spent regenerating the High Street and centre of Keynsham, with a new clock tower and civic centre. This was in the hope of attracting new business and jobs post closure of the Cadbury Somerdale Factory (a key employer of the area for many decades).

3.4 The housing stock of Keynsham is mainly made up of Victorian terraces (surrounding historic core) and Inter-war Semi-detached and Detached properties.



Aerial photograph of KEYNSHAM HIGH STREET with Parish Church in middle background and main Bristol-London railway line in background.





Ordnance Survey First Series 1817



Geographical Publications Limited Land Utilisation Survey of Britain 1939



1986 Map of the Area Ordnance Survey 100039117

Historic Maps

3.5 The historic growth of Keynsham (as can be seen from the adjacent maps) has typically developed along the main road from Bristol to Bath. This is with a tendency to grow in a Southerly and Westerly direction.

There has been particular housing growth phases within this settlement, namely Victorian development, Inter-war housing and 1960s-80s Detached and Semi-detached style expansion of the town.

The maps reflect the growth of the town across 128 years in terms of housing but also the development of transport, infrastructure and neighbouring settlements.

Section 4: Site Context

The site is located adjacent to Charlton Road as it enters Keynsham from the South. It occupies about 9.5ha and could accommodate around 260 homes at 25dph. The landowner has confirmed that this area is available for development potential.

Site Location

4.1 The site is located to the south west of Keynsham and is adjacent to Greenhill Farm Phase 1 the northern field of an adopted core strategy allocation bounded by Charlton Road and Parkhouse Lane. The total allocation is slightly rectilinear in shape and the field which is the subject of this planning application is bounded by Lays Farm Development proposal to the North and a further residential allocation K2A to the East along with Charlton Road and existing hedgerows and Green Belt land to the South and West. The field is open, with no other trees and woodland apart from those forming the boundaries.

4.2 The existing residential area to the North of the K2A allocation includes a primary school (Castle School), a small parade of shops, including a hairdressers, convenience store, takeaway and public house within 1,000 metres of the proposed site. The closest doctors' surgery, pharmacy and secondary school are within 2,000 metres of the site.

4.3 Keynsham Town Centre is located approximately 1.3 miles northeast of the site. Regular bus services connect the existing residential area to Keynsham

Town Centre and Saltford (665, 349, 338) and Bath (338). To the south, Charlton Road links to the A37 which connects Bristol to Shepton Mallet.

Landscape and Visual Aspects

4.4 This is currently a flat plateau land used for grazing and consisting of two open fields bounded by clipped hedges.

- An isolated warehouse located to the west of the site, accessed by a lane off Charlton Road, adjoins the south west of this land.
- A public right of way runs along the northern boundary.
- Although previously quite isolated the recent developments east of Charlton Road have considerably changed this perception.

Sustainability Characteristics

4.5 The site is well located in terms of accessibility to local facilities, schools, shops, public open space and bus services linking to the town as well as Bristol and Bath (in addition to a wider network through train services).



Keynsham Flood Probability Map



Source: Environment Agency

Flooding Issues

4.6 In a town where there are substantial risks from flooding the danger from flooding on land west of Charlton Road is minimal.

Gas Pipe Line

4.7 Previous assessments of the land in 2013 (Green Belt Review and SHLAA) said the gas pipeline and associated HSE buffer runs through the site and rejects its development potential.

However, subsequent work has shown the pipeline runs along the western boundary of the land and would enable most of the land to be developed. This would provide a clearly defined defensible western boundary to the Green Belt.



Section 5: Green Belt Release

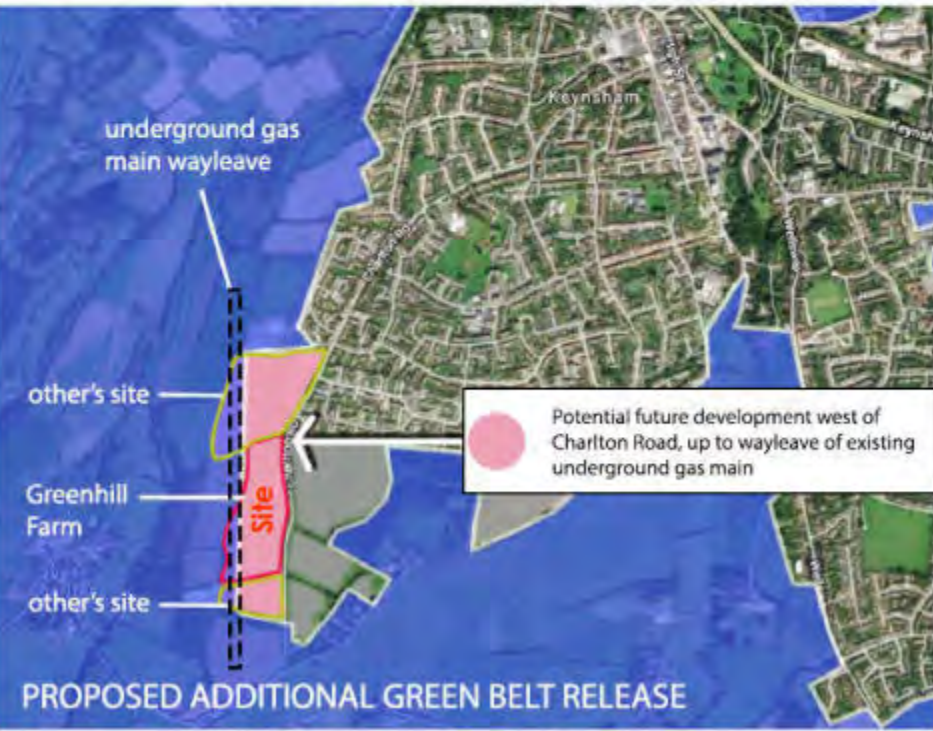
5.1 Greenhill farm lies to the West of Keynsham within the designated Bristol and Bath Green belt, between Keynsham and both Whitchurch and Stockwood in Bristol. As such, in current Policy Terms, it serves 1 of the 5 purposes of Green Belt set out in Paragraph 80 of the NPPF, namely 'to prevent neighbouring towns merging into one another.' However, there has been a previous Green Belt release in the area as land to the South of Keynsham was allocated for up to 700 dwellings with 500 in the Plan Period in the adopted Bath and North East Somerset (BANES) Local Plan as Sites K2a and K2b. Greenhill Farm adjoins allocated Site K2a in 2 parcels, 1 to the South (Phase 1 – App. No: 15/04290/FUL) and 1 to the West of the allocation. It is important to note here that these allocations were brought forward through the Local Plan by the Local Planning Authority without undertaking a comprehensive Green belt Review.

5.2 BANES has, through its consultants Arup's reviewed the Green Belt gap between Keynsham and Stockwood as well as having identified and noted the easternmost field on the Lays Farm Site as potentially suitable for development. This area is outlined as part of Alternative Option Km3 in Annex 3 of the Schedule of Core Strategy Amendments – November 2013.

Arup's West Keynsham Development Concept Options Report (March 2013), should be reviewed, as it placed an existing high pressure gas main inaccurately on the Lays Farm Site, and also incorrectly presumed an overly wide easement zone associated with it as a result. The incorrect location of this main heavily influenced Arup's Developable Area which has fed through into the Schedule of Core Strategy Amendments.

5.3 However, the land to the West of Charlton Road was not assessed at all by Arup and does not form part of the South West extension. Nonetheless, this land does provide a link between the proposed South West extension, K2a and land to the South of Lays Farm which would effectively link a South West and Western extension to Keynsham which would accommodate greater numbers.

5.4 The rationale for including Keynsham within the emerging spatial strategy (from the West of England Joint Spatial Strategy supporting documentation) highlights '*Whilst part of this location lies outside the Green Belt, there are exceptional circumstances to justify removing the rest of the location from the Green Belt in light of its relative GB performance against other GB locations (see Topic Paper 5 on the Spatial Strategy Methodology).*' Although it should be noted that West, South-west and South-east Keynsham were considered but not put forward for inclusion within this strategy.



Response to West of England Joint Spatial Plan

5.5 We note that Table 2 simply says the location lies within green belt with no further comment, in contrast to locations in the green belt elsewhere which are then identified with potential for non strategic growth.

Table 2 says the location does not perform well in the Sustainability Appraisal, but this is in complete contrast to the previous assessment in two Local Plans which has resulted in the allocation of sites K2 and KE4 to the south west of Keynsham.

Whilst the plan in Appendix 2 of the Green Belt Assessment identifies land on both sides of the Bristol/Keynsham gap as having a major contribution to the green belt, it is proposed to release land on the Whitchurch side but not at Keynsham. We consider there is an opportunity to complete the developments south west of Keynsham, provide a Charlton Road gateway into the town and provide a less hard urban edge to the south and west of the town, as illustrated on the attached concept plan (opposite).

Section 6: Proposed Development Strategy

6.1 The development strategy will address the following opportunities and constraints:

- The gas pipeline and HSE buffer needs to be taken into account but provides the opportunity to establish a strong landscape boundary to the Green Belt;
- Access from new Charlton Road roundabout;
- Create a new gateway feature to Keynsham together with new development to the east of Charlton Road;
- Need to enhance local bus services;
- Provide links to National Cycle Route 4;
- Is in keeping with the historic and current pattern of growth within a sustainable location.

Concept Strategy

1. Potential Residential Development
2. Potential POS Corridors
3. Existing Tree group retained as feature
4. Potential access from existing roundabout on Charlton Road
5. Public right of Way
6. Underground gas main
7. Forthcoming new development
8. Potential future development by other

PROJECT:	South Keynsham
DRG TITLE:	Land use concept
DATE:	DRG NO:
SCALE:	NTS
DWG BY:	DRG BY:
DWG DATE:	21.11.16



Prepared by: [Name] / [Title]
Checked by: [Name] / [Title]
Approved by: [Name] / [Title]

Section 7: Why West of Charlton Road and West Keynsham?

7.1 Persimmon Homes Severn Valley support the proposed West Keynsham Urban Extension which as this document demonstrates is sequentially the most preferable direction of growth for Keynsham. Redrow have been promoting land South of Lays Farm through the Core Strategy to which Greenhill Farm, West of Charlton Lane, would be a natural extension southwards. The arguments supporting this development are as follows:

- Keynsham is an area well supported by public transport facilities and offering a range of local facilities and services as well as employment opportunities.
- Keynsham was identified as a strategic development location within the JSP and a sustainable location for development by the Local Plan Inspector.
- West of Keynsham is a rounding off the settlement of Keynsham and is well contained in the landscape and well related to the Town Centre, employment, schools and other facilities.
- The Western boundary is defined by a field hedgerow which is generally continuous along its length and is tall in stature and as such is prominent. There is a strong visual relationship between the land itself and the adjacent highway and also with the residential properties and Lays Farm to the North. The Lays Farm Business Centre currently defines the most Westerly point of Keynsham's development

envelope and is reinforced by another existing tall hedgerow. As a consequence, development of the site would not materially extend the settlement boundary further westwards than that which currently exists.

- North of Lays Farm there is a ridgeline which is broadly orientated North-South across the area of open land and with the existing Western edge of Keynsham lying to the East and below the crest of this local high ground. As a result there is little inter-visibility between this existing edge of Keynsham and the residential district of Stockwood to the West of which is the Bristol City Council area. This topographical feature maintains visual, as well as physical separation between these two settlements.

Although the site falls within the Green Belt, existing development which lies immediately to the North and East of the site provides a strong development framework within which development of the site would be framed. Development can be accommodated on the site without harming the purposes and objectives of the Green Belt and specifically the role it performs locally between Stockwood and Keynsham. The Western boundary of the site could be strengthened with tree cover to establish a stronger landscape framework to both physically and visually contain without causing material harm in landscape and environmental terms, or from a Green Belt point of view.



Proposed Green Belt release between Bristol and Keynsham (with indicative development)

Conclusions

7.2 There are a number of positive indications justifying the promotion of a Green Belt release at Greenhill Farm Phase 2:

- The emerging Local Plan is still unresolved.
- The Council now accept the need to release Green Belt sites to meet their current housing numbers which are likely to rise further through an NPPF compliant objectively assessed housing need.
- The previous Local Plan Inspector, the Council and the Arup Review recognised Keynsham as a sustainable location for development as well as the emerging JSP.
- The lack of consistency in appraising Green Belt sites and that this site (the Western part of Greenhill Farm) has not been properly assessed.
- The role of Greenhill Farm in linking a West and South West urban extensions at Keynsham, which would also justify a larger Green Belt release, rather than the current proposal for 6 small areas.

Whilst there are unique circumstances which enable the immediate promotion of this land, it does require land to be released from the Green Belt and the ability to promote the land on a longer term basis through a review of the Local Plan or in conjunction with the separate Bristol and Bath Green Belt Review should be secured.



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PERSIMMON
Together we make a home

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

From: Christine Pritchard [REDACTED]

Sent: 28 November 2017 11:05

To: Local Plan

Subject: comments

Hello

I have a couple of comments / observations:

1, I was confused by the reference to 'prevention'. On your graphic I see it is something to do with independent living for the elderly but by preventing what exactly?

2, I would suggest that continuing with the current hierarchical approach to non-strategic development is the least of the evils on offer.

3, In the sustainability assessment I don't feel enough weight has been given to light pollution (in objective 9). New 'architect designed' homes are given large expanses of glass which allow light to spill out and become beacons in the (otherwise dark) landscape.

Christine Pritchard