

## Respondent

<b>Company</b>	Beech Avenue Residents' Association
<b>Name</b>	Chris Beezley Chairman

## Housing Needs and Student Accommodation

### Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...

Option 3 in combination with Option 5.

Bath's two universities have a history of offering only about a quarter of their students university-managed accommodation, resulting in Bath hosting one of the highest proportions of students per head of population in the UK (already in excess of 25%). Table 2 shows that 11,700 students relied on private-sector accommodation in 2016/17 and that this could rise to 13,200 within 3 years.

There is already identified scope to accommodate substantially more students within the existing University of Bath (UoB) core campus for predicted future demand, i.e. without further compromising Green Belt or AONB designations. Additionally, General Development Principle (h) of B&NES's Placemaking Plan Policy SB19 seeks to optimise campus development capacity by employing decked parking, thereby providing the potential for hundreds more campus student bedspaces. Decked parking currently features nowhere in the UoB campus Masterplan.

The extant UoB Masterplan (2014 update, to 2026) includes provision for 2,400 new study bedrooms, of which only 1,000 will have been built when Polden Corner opens in Autumn 2018. Hence, there remains scope to build a further 1,400 bedspaces within the confines of the current built campus (i.e. not within the Green Belt or the Cotswolds AONB) as defined in the 2014 Masterplan update, with scope for many hundreds more if decked parking is employed in place of the extensive surface campus parking currently in use.

Beech Avenue Residents' Association (BARA) notes from Table 3 (Options for responding to the universities' growth and student accommodation demand) that a revised University of Bath Masterplan is in preparation, and argues strongly that no consideration should be given to releasing further Green Belt land (or compromise the protection of the Cotswolds AONB) to facilitate the provision of more UoB student accommodation while copious options exist to satisfy all predicted demand for additional student bedspaces within the existing core campus.

Please Note: Option 4 is strongly resisted by BARA as it unnecessarily compromises Green Belt (and thereby coincident Cotswolds AONB) land - which should be afforded the "highest status of protection" National Planning Policy Framework (NPPF) para.115. The NPPF (para.116) requires that an assessment of the scope to develop elsewhere is undertaken before any major development is permitted in an AONB. No such assessment has been undertaken in respect of, for example, General Development Principle (h) of PMP Policy SB19 which seeks to optimise campus development capacity by employing decked parking.

### Q21b - Are there any other options?

BARA prefers a combination of Options 3 and 5 (New Option 6) as follows:

Option 6

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Further academic space must be supported by the provision of additional student accommodation on-campus (including 2nd & 3rd year students) as agreed and articulated in a negotiated formal Student Housing Policy.

**Pros:**

- Enables strong protection of employment and housing land;
- Additional academic space will need to be matched with student accommodation provision on campus;
- University of Bath 2014 Masterplan update identifies sufficient scope for additional campus student accommodation for the foreseeable future with even more being achievable with decked parking as proposed in the Placemaking Plan.

**Cons:**

- Potentially limit or constrain university growth;
- University of Bath - A revised masterplan is in preparation;
- Bath Spa University "limited on-campus capacity."

**Respondent**

<b>Company</b>	Bristol Avon Catchment Partnership
<b>Name</b>	Zoe Hancock Catchment Coordinator

**Vision and Spatial Priorities**

<b>Q1 - Have we identified the critical issues facing the District over the next 20 years?</b>
Yes
<b>Q1 - Please give reasons for your answer</b>
The BACP consider that the following issues may also require detailed consideration in the Plan: 1. Adaptation to heat stress (overheating) is likely to increase in the next twenty years. 2. Adaptive Management Strategies for the natural and built environment. As new climate change data (new climate projections due in 2018) and other local evidence becomes available. There is a need to recognize and manage through planning policy the risks to the natural environment from climate change impacts. Especially if Green Infrastructure (GI) occupies a greater role in mitigating risks such as through, Natural Flood Management and mitigating heat stress. A requirement for the effectiveness of GI mitigation under different climate scenarios and conditions should be adequately assessed and managed.

<b>Q2: Are the suggested spatial priorities the right ones?</b>
Yes
<b>Q2 - Please give reasons for your answer</b>
The BACP welcomes and supports Policy 5, Place Shaping Principles, outlined in the West of England Joint Spatial Plan (JSP). However, the desired outcome from the high-level policy statements JSP may not be sufficiently realized unless there is adequate demonstration that these are supported by linked detailed planning policies in Local Plans, and Supplementary Planning Documents (SPDs). Through consultation on individual Unitary Authority Local Plans the BACP is keen to discuss examples of potential linked detailed policies that could support Policy 5 Place Shaping Principles.

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This could include:

â€¢ The need to address increasing climate change impacts which will require investment in green infrastructure and sustainable urban drainage (or water sensitive urban design). Development Plans must be mindful of the competing uses that will need to be accommodated in the public realm of new and existing developments with increasing climate change impacts such as increased rainfall and intensity and heat stress (over heating). Space is required for roads, cycle paths, parking for bicycles and cars, street trees for shade and cooling and sustainable urban drainage etc. Transport networks and development typically increase the impermeable surfaces which can lead to flooding and drainage issues where not previously experienced. Therefore, any transport policy is intrinsically linked to the spatial policy and should recognize that the trade-offs will be made in the public realm between the need to accommodate more cars and the need to provide space for sustainable urban drainage and green infrastructure. It may be advantageous to take an approach similar to the healthy streets approach.

<https://healthystreets.com.files.wordpress.com/2017/01/healthy-streets-for-london.pdf>

â€¢ In terms of resilience to severe weather and longer-term climate change impacts, it would be advantageous if planning authorities understand where the thresholds for disruption are in the natural and built environment and develop integrated plans for addressing long-term risks that can be refined and monitored. The BACP is keen to work with B&NES, the Environment Agency, Natural England, other infrastructure providers and the Water Companies to help develop a common approach developing mitigation and adaptation policies

â€¢ Measures to identify, protect, enhance and manage different soils types, recognizing that different soils support different flora and fauna and integrate new data on soils into local plans

â€¢ Policies on water efficiency in new developments should be explored, particularly rainwater and grey water recycling, with ambitious aims to decrease consumption

â€¢ There is also the need to recognize and manage through planning policy the risks to the natural environment from climate change impacts. Especially if green infrastructure (GI) occupies a greater role in mitigating risks. A requirement for the effectiveness of GI mitigation under different climate scenarios and conditions should be adequately assessed and managed.

We would welcome the opportunity to work with key strategic partners to jointly develop potential detailed polices from a wide perspective. Cross sector, workshops with the key strategic planning organizations around the strategic development locations could be effective to inform detailed policy and design to go into Local Plans.

## **Spatial Strategy Options**

### **Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?**

The BACP does not have a preference at this stage however notes that development on brownfield sites can have the benefit of existing or recent connections to sewerage and water supply services. This could provide the opportunity to reduce surface water flow from brownfield sites by the use of Sustainable Drainage Systems (SuDS) and the BACP hopes that the LPA supports securing green space within sites to accommodate SuDS whilst contributing to placemaking, wellbeing and water quality.

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**Q4 - Are there any other approaches/scenarios you think should be considered for accommodating non-strategic growth in B&NES**

Yes

**Q4 - Please give reasons for your answer**

Climate change scenarios using more detailed data (Climate projections due in 2018) when this becomes available.

The BACP is currently in discussion with the Environment Agency to identify locations within the catchment that would benefit from Natural Flood Management interventions. The BACP would welcome an on-going discussion with the Council to embed any future planning/projects within the BACP partnership projects that are currently being scoped and developed. Especially in areas that are identified as rapid-response sub-catchments.

**Q5a - Have we considered all the issues?**

No

**Q5a - Please give reasons for your answer**

**Flooding & Drainage**

Flood risk is a key issue for this Strategic Development Location and the risk is likely to increase with climate change. The Environment Agency and Lead Local Flood Authority are the statutory authorities to provide advice on flood risk. The BACP would welcome an opportunity to engage with regards to the flood risk and opportunities associated with both development locations (Keynsham and Whitchurch).

The BACP is currently developing water based projects across the catchment and any opportunity to join up work programmes to deliver multiple benefit partnership projects would be welcome.

Consideration should also be made concerning the high groundwater levels in this location and potential issues with groundwater flooding and sewer inundation and associated impacts to the river Avon.

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

As this is a particularly vulnerable site, there is the opportunity to design to the highest standards incorporating the latest data on climate projections due in 2018. Surface water management should include data on urban creep, population projections, and demographics to better understand and manage surface water.

In addition, consideration of the impacts on the local Sites of Special Scientific Interest and Sites of Nature Conservation should ensure that development does not exacerbate risks to these sites.

Finally, consideration should be made of what spaces and green infrastructure (including the provision of new habitat) within the proposed development will be adopted and managed and by whom. Consideration should also be made of the annual financial provision to maintain and restore these spaces as well as additional expenditure that may be required to restore green infrastructure after flood events or droughts etc.

## Strategic Development Location: North Keynsham

### Q6a What are your views on the vision and objectives?

The BACP would be keen to see the Council consider some of the more detailed issues and options which have not necessarily been included at this stage within this Local Plan consultation. These specifically cover drainage and flooding, green infrastructure, opportunities for water efficiency and creating a healthy environment for all residents.

We would welcome inclusion of further policies or more detailed policies based on:

- Local feedback from the risks outlined in the Government's Climate Change Risk Assessment 2017
- Feedback to DEFRA through the Local Adaptation Advisory Panel on the next National Adaptation Program (2018)
- The Progress in Preparing for Climate Change 2017 Report to Parliament Committee on Climate Change
- Policies in the Draft London Plan 2017 and London Environment Strategy 2017

### Q6b What type of place should be created here?

### Q7a - What do you think of the proposed road alignment?

The BACP do not have specific comments on the road or rail plans but would like to be assured that these have been considered in the context of a changing climate, more intensive rainfall, and the implications for the surface water drainage network and potential flooding.

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

The BACP do not have specific comments on the road or rail plans but would like to be assured that these have been considered in the context of a changing climate, more intensive rainfall, and the implications for the surface water drainage network and potential flooding.

### Q8a - What do you think of the proposed approach to the street network and wider connections?

The BACP do not have specific comments on the road or rail plans but would like to be assured that these have been considered in the context of a changing climate, more intensive rainfall, and the implications for the surface water drainage network and potential flooding.

### Q8b - Do you think it is important to create a healthy neighbourhood by encouraging walking and cycling?

Yes

### Q8b - Please give reasons for your answer

Question 8 b - Concern about the environmental impacts of pharmaceuticals is growing and the use of medicines by people continues to increase. There are three potential sources of pharmaceuticals in the environment: Patient use, improper disposal and point sources from the production of medicines. The main route by which pharmaceuticals enter the aquatic environment is through the discharge of treated effluent from sewage treatment works (STWs). As conventional sewage treatment processes do not typically remove these compounds, a high proportion pass into the environment. The estimated cost of adding treatment processes to remove pharmaceuticals from STWs in the Wessex Water region is Â£2.2 billion, along with additional energy and chemical costs.

The BACP is therefore supportive of measures to create a healthier region and would recommend that any new policy consider steps to reduce health inequalities by ensuring that the wider determinants of health are addressed in an integrated and co-ordinated way. This should take a

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systematic approach to improving the mental and physical health of all people through promotion of a more active and healthy lifestyle for all and enable people to make healthy choices. Development proposals should assess the potential impacts and opportunities on the health and wellbeing of communities, in order to mitigate any potential negative impacts and help reduce health inequalities, for example through the use of Health Impact Assessments.

**Q9a - What do you think of the proposed response to landscape impact, especially considering views from the Cotswolds?**

No comment.

**Q9b - How can we improve the Green Infrastructure network through the site?**

The BACP is supportive of the use of green infrastructure to enhance new and existing developments. Multi-functional green infrastructure can provide multiple benefits including amenity, surface water attenuation and purification, improvements to air quality and localized shading to reduce heat stress.

We would like BANES to consider the following detailed policies when developing the Local Plan to support Policy 5, the Place Shaping Principles, in the West of England Joint Spatial Plan, these relate to the Public Realm, Green and Blue Infrastructure:

These are based on:

- Local feedback from the risks outlined in the government's Climate Change Risk Assessment 2017
- Feedback to DEFRA through the Local Adaptation Advisory Panel on the next National Adaptation Program (2018)
- The Progress in Preparing for Climate Change 2017 Report to Parliament Committee on Climate Change
- Policies in the Draft London Plan 2017 and London Environment Strategy 2017:

In particular, the Green Infrastructure Network could be improved by:

- Incorporating green infrastructure into the public realm to support rainwater management through water sensitive urban design/sustainable drainage, reduce exposure to air pollution, manage heat and increase biodiversity.
- Green and open spaces planned, designed and managed as green infrastructure provide a wide range of social, health and environmental benefits and are a vital component of any development's infrastructure. Individual spaces are important at the neighborhood level as they are the spaces which are used most often and may become increasingly important to reduce local heat stress. Connectivity across the network of green and open spaces is particularly important as this provides opportunities for walking and cycling and for improving wildlife corridors. [Source: Draft London Plan, 2017]
- Proposals to enhance green and open spaces to provide a wider range of benefits for all will be encouraged. Examples could include improved public access for all, inclusive design, recreation facilities, habitat creation, landscape design improvement or flood storage.
- Urban greening covers a wide range of options including, but not limited to, street trees, green roofs, green walls, and rain gardens. It can provide a range of benefits including amenity space, enhanced biodiversity, addressing the urban heat island effect, sustainable drainage and amenity planting.

We would welcome policy inclusion or support on the following issues:

Waterways' strategic role

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To reflect the distinctiveness of areas that specifically relate to the Bristol Avon River and tributaries, the Local Plan should designate, and ensure the maintenance and sustainable management of, the Bristol Avon Catchment in line with Core Policy 5 of the JSP.

The term “waterways” does not only refer to the Bristol Avon River, its sub catchments and individual watercourses and canals, but also to other water spaces including lakes and reservoirs. This network of linked waterways is of strategic importance for the West of England and wider Bristol Avon Catchment. Waterways are multifunctional assets. They provide transport, and recreation corridors; green infrastructure; a series of diverse and important habitats; a unique backdrop for important heritage sites, landscapes, views, cultural and community activities; and drainage, flood and water management functions.

As such, they provide environmental, economic and health and wellbeing benefits. They are protected and their water-related use - in particular safe and sustainable tourism, cultural, community and recreational activities, as well as biodiversity are promoted. The BANES Waterspace study and other River Strategies and the Bristol Avon Catchment Plan, and the Environment Agency’s Severn River Basin Management Plan also support many of these functions.

The Bristol Avon is a strategically important and iconic feature of the West of England. The Local Plan and green infrastructure proposals should have regard to the following in design of developments adjacent to the River: proximity to the river, clear visual links between areas, buildings and the river, specific geographical features such as main roads, railway lines and hedges, the whole curtilage of properties or sites adjacent to the River, areas and buildings whose functions relate or link to the River, areas and buildings that have an historic, archaeological or cultural association with the River, consistent boundaries with neighboring authorities.

Joint Bristol Avon River Strategies should cover:

• The local character of the river, water-based passenger and freight transport nodes, development sites and regeneration opportunities, opportunities for environmental and urban design improvements, sites of ecological or archaeological importance, sites, buildings, structures, landscapes and views of particular sensitivity or importance, focal points of public activity, inclusive public access, strategic cultural value, recreation and marine infrastructure, indicative flood risk and water quality.

Green/Blue Infrastructure Strategies should specifically identify and address deficiencies in:

• Water-based passenger, tourism; sport, leisure and mooring facilities; marine support infrastructure; and inclusive access and safety provision. A Water Space Study is being implemented in Bath and North East Somerset which the BACP strongly supports, however no joint strategy currently exists to manage links between the upper catchment (Wiltshire and Bath and North East Somerset) or the lower Catchment (Bath and North East Somerset and the Severn Estuary).

Protecting the West of England’s Waterways

Development proposals that facilitate river restoration, including opportunities to open culverts, naturalise river channels, protect the foreshore and increase the heritage and habitats value, should be supported if appropriate. In contrast, we consider that development proposals to impound and constrain waterways would be inappropriate.

River restoration seeks to enhance their biodiversity, water quality and amenity value. The Bristol Avon Catchment Plan, identifies many opportunities for river restoration, as well as showing examples that have been implemented across the West of England.

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**Water infrastructure**

- In order to minimize the use of mains water, water supplies and resources should be protected and conserved in a sustainable manner.
- Development proposals should:
- Provide ambitious water efficiency targets, maximizing rainwater and exploring Grey recycling to meet this requirement.
- Be encouraged to incorporate measures such as smart metering, water saving and recycling measures, including retrofitting, to help to achieve lower water consumption rates.

**Water Quality**

In terms of water quality Development Plans should (in line with Policy 5 of the JSP):

- Promote the protection and improvement of the water environment should take account of the Severn River Basin Management Plan and Bristol Avon Catchment Plan.
- Development proposals should:
- Seek to improve the water environment and ensure that adequate wastewater infrastructure capacity is provided and be designed to ensure that misconnections between foul and surface water networks are eliminated and not easily created through future building alterations.
  - In relation to wastewater, Water Framework Directive requirements should be maintained through the Severn River Basin Management Plan and the Bristol Avon Catchment Plan.
  - A cross sector Integrated Catchment based approach to Water Management should be considered for Strategic Development Locations, where particular flood risk and water-related constraints such as limited sewer capacity require an integrated approach to the provision of infrastructure and management of risk.

**Flood risk management**

- Current and expected flood risk from all sources across the Bristol Avon Catchment including the West of England should be managed in a sustainable and cost effective way in collaboration with the Environment Agency, the Lead Local Flood Authorities, developers and infrastructure providers.
- Development Plans should use Strategic Flood Risk Assessment as well as Surface Water Management Plans, where necessary, to identify areas where particular flood risk issues exist and develop actions and policy approaches aimed at reducing these risks. Local Authorities should co-operate and jointly address cross-boundary flood risk issues including with authorities outside the West of England.
- Development proposals which require specific flood risk assessments should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses.
- Development proposals for utility services should be designed to remain operational under flood conditions and buildings should be designed for quick recovery following a flood.
- In terms of mitigating residual risk, it is important that a strategy for safe evacuation and quick recovery to address such risks is in place; this is also the case for utility services.

**Sustainable drainage**

Lead Local Flood Authorities should identify “ through their Local Flood Risk Management Strategies and Surface Water Management Plans “ areas where there are particular surface water management issues and aim to reduce these risks.

Development proposals must demonstrate satisfactory disposal of surface water and that Sustainable Drainage Systems have been incorporated. Sustainable Drainage Systems should maximise opportunities for green infrastructure (including Natural Flood Management) and aim to achieve greenfield run off rates with surface water run-off managed as close as possible to its



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source. Separate systems of drainage with points of connection or outfalls should be agreed with Wessex Water.

Development proposals for impermeable paving should be refused where appropriate, including on small surfaces such as front gardens and driveways.

The benefit of attenuation above compared to below ground or in a basement is that pumping is normally not required to empty the attenuation tank. Local Flood Risk Management Strategies and Surface Water Management Plans should ensure they address flooding from sewers, drains and groundwater, and run-off from land and small watercourses that occurs as a result of heavy rainfall.

**Q10a - What should the housing mix comprise of?**

No comment.

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

No comment.

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

Yes

**Q11a - Please give reasons for your answer**

Please see response to Q9.b

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

b) Climate change risks will demand highly ambitious detailed policies. Examples of potential detailed policies we would welcome in the BANES Local Plan to support Policy 5 the Place Shaping Principles in the West of England Joint Spatial Plan could be based on:

• Local feedback from the risks outlined in the Government's Climate Change Risk Assessment 2017

• Feedback to DEFRA through the Local Adaptation Advisory Panel on the next National Adaptation Program (2018)

• The Progress in Preparing for Climate Change 2017 Report to Parliament Committee on Climate Change

• Policies in the Draft London Plan 2017 and London Environment Strategy 2017

**Q12a - How can Avon Valley Wildlife & Adventure Park be best integrated into the new development?**

Please see response to Q9.b

**Q12b - What opportunities are there to minimise visual impact from the Cotswolds?**

No comment.

**Q12c - Do you agree with the requirement to link with the Bristol to Bath cycle path?**

Please see response to Q9.b

**Strategic Development Location: Whitchurch**

**Q13a - What additional aspirations would you have here?**

Housing delivery will be dependent upon key infrastructure being delivered at the appropriate time and pace.

Flood risk is a key issue for this Strategic Development Location and the risk is likely to increase with

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climate change. The Environment Agency and Lead Local Flood Risk Authority are the Authorities to provide advice on flood risk. We would note that the developable areas are likely to form the headwaters for two streams draining north east and south west. Development should therefore seek to ensure that surface water generated should be of sufficient quality to avoid deterioration of water quality and not increase flood risk downstream. The location of development is spread across (or may affect) two waterbodies classified under the Water Framework Directive:

- Chew - conf Winford Bk to conf R Avon (Brist). This is currently at moderate overall status (with phosphate as a potential issue).
- Brislington Brook. This is also currently at moderate overall status, with particular issues surrounding phosphate, invertebrates and macrophytes/phytobenthos.
- Bristol Avon (By Brook to Netham Weir). This waterbody (of which the stream flowing through Smallbrook is a part) is currently at moderate status.

**Q13b - How can this vision be delivered?**

The following are recommendations to consider:

- We recommend that all developments follow the SUDS Hierarchy to ensure that surface water drainage issues are adequately dealt with. The development proposals must demonstrate satisfactory disposal of surface water and that Sustainable Drainage Systems have been incorporated. Sustainable Drainage Systems should maximise opportunities for green infrastructure and aim to achieve greenfield run off rates with surface water run-off managed as close as possible to its source. Systems should be designed and implemented to deliver multiple environmental benefits, such as water use efficiency, water quality, biodiversity, amenity and recreational improvements.

- For surface water, alternative means of disposal (e.g. SUDS, natural watercourse, highway drains) must be properly investigated before any connection to a public sewer will be considered. In cases where there is no other option, only rainwater from impermeable surfaces could be considered, and then only into a dedicated public surface water sewer. Details relating to flow rates and storage would also need to be submitted. Such connections must not be made to the foul systems.

- There is the potential to provide more ambitious and comprehensive standards for SUDS than national standards. For example removing the automatic right to connect new development to the existing sewerage network. As recommended in the Progress in Preparing for Climate Change 2017 Report to Parliament Committee on Climate Change, there should be more comprehensive and ambitious national standards for SUDS. The automatic right to connect new development to the existing sewerage network to be made conditional on the national SUDS standards being met, and a clear policy on who should maintain and adopt SUDS by default.

- As this is a particularly vulnerable site in term of surface water flooding, there is the opportunity to design to the highest standards incorporating the latest data on Climate projections due in 2018. Surface water management should include data on urban creep, population projections, and demographics to better understand and manage surface water.

**Q14a - Is this the right approach?**

We would welcome detailed potential policies in the Local Plan as outlined above. In particular, please see response to Q9.b.

**Q14b - Could some development take place in other areas outside of this broad development location?**

No comment.

**Q14c - What would be the benefits of this?**

No comment.

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**Q14d - What evidence is available to support development in these areas?**

No comment.

**Q15 - What should happen with the existing separation between Whitchurch village and Bristol urban area? Should we:**

No comment.

**Q16a - How could the existing village centre be enhanced to cater for the needs of an increased population?**

No comment.

**Q16b - How do we best integrate new local centre and facilities with the existing communities?**

No comment.

**Q17a - How can we improve the quality of green spaces, and ensure that people have better access to recreational facilities...**

We would welcome detailed potential policies in the Local Plan as outlined above. In particular, please see response to Q9.b.

**Q17b -How could we make more of Stockwood Vale or Maes Knoll as important environmental assets to the local area? Could...**

We would welcome detailed potential policies in the Local Plan as outlined above. In particular, please see response to Q9.b.

**Q18a - How can we enhance routes for walking and cycling, for example to Keynsham and towards Bristol?**

We would welcome detailed potential policies in the Local Plan as outlined above. In particular, please see response to Q9.b.

**Q19 - What sort of employment would be suitable as part of the new development and how much?**

No comment.

## Development Precedents

**Q20a - What are the qualities of the places on pages 24 to 27 that could be used in either of the new development areas?**

The BACP is in favour of the inclusion of green space and SUDs within the development to assist with surface water management, improve water quality and to provide areas to encourage physical and mental health and wellbeing.

## Housing Needs and Student Accommodation

**Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...**

No comment.

## Respondent

<b>Company</b>	Churches Together in Keynsham and Saltford
<b>Name</b>	David Clarke Chair

### Q5a - Have we considered all the issues?

No

### Q5a - Please give reasons for your answer

I cannot find any reference to "creating a local community". A development of this size needs a community heart.

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

I suggest that you consider how well-being and integration might be encouraged ... e.g. a community drop-in centre, space for clubs and societies to meet.

## Strategic Development Location: North Keynsham

### Q6b What type of place should be created here?

I recommend that the development includes non-commercial community facilities ... at least one multi-use community building (with provision for worship) as a minimum, or a community building and a church.

## Respondent

<b>Company</b>	Compton Dando Parish Council
<b>Name</b>	Susan Smith Parish Clerk

## Vision and Spatial Priorities

### Q1 - Have we identified the critical issues facing the District over the next 20 years?

Yes

### Q1 - Please give reasons for your answer

Agree with ideas except think need to consider artificial intelligence with regard to employment.

### Q2: Are the suggested spatial priorities the right ones?

Yes

### Q2 - Please give reasons for your answer

Villages in particular need better public transport services that are regular and affordable.

## Spatial Strategy Options

### Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?

Option 1 - Continue the existing hierarchical approach

### Q3 - Please give reasons for your answer

Promotion of Green Belt.

**Q4 - Are there any other approaches/scenarios you think should be considered for accommodating non-strategic growth in B&NES**

Yes

**Q4 - Please give reasons for your answer**

Riverside buildings - need replacing.

**Q5a - Have we considered all the issues?**

Yes

**Q5a - Please give reasons for your answer**

Agree with statements

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

Need to achieve a balance of new housing with employment available in the area i.e. more houses, more employment.

### Strategic Development Location: North Keynsham

**Q6a What are your views on the vision and objectives?**

Fine as stated.

**Q6b What type of place should be created here?**

Accessible by the residents of the villages. Good links are needed without creating 'rat runs'.

**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?**

no

**Q8a - What do you think of the proposed approach to the street network and wider connections?**

Concern over the traffic coming out of Avon Mill Lane.

**Q8b - Do you think it is important to create a healthy neighbourhood by encouraging walking and cycling?**

Yes

**Q8b - Please give reasons for your answer**

Encouraging cycling and walking reduces congestion and promotes a healthy lifestyle.

**Q9a - What do you think of the proposed response to landscape impact, especially considering views from the Cotswolds?**

Need a green infrastructure buffer.

**Q9b - How can we improve the Green Infrastructure network through the site?**

By providing a safe open corridor.

**Q10a - What should the housing mix comprise of?**

Truly affordable housing with shared ownership and social housing

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

no

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

No

**Q11a - Please give reasons for your answer**

Impossible to achieve.
<b>Q11b - How ambitious should we be? How do you think this aim could be achieved?</b>
Any realistic reduction would be good.

<b>Q12a - How can Avon Valley Wildlife &amp; Adventure Park be best integrated into the new development?</b>
Put up a screen to reduce noise and limit the number of large events.
<b>Q12b - What opportunities are there to minimise visual impact from the Cotswolds?</b>
<b>Q12c - Do you agree with the requirement to link with the Bristol to Bath cycle path?</b>
Yes
<b>Q12c - Please give reasons for your answer</b>
It is important to encourage safe cycling.

### Strategic Development Location: Whitchurch

<b>Q13a - What additional aspirations would you have here?</b>
none
<b>Q13b - How can this vision be delivered?</b>
Create a close liaison with Keynsham Town Council, Compton Dando Parish Council and Saltford Parish council for the North side development.

<b>Q14a - Please give reasons for your answer</b>
Plan too small to decide what was being shown.
<b>Q14b - Could some development take place in other areas outside of this broad development location?</b>
No to all. These are green spaces that are very important to retain with all the building that is going on. Queen Charlton is a conservation village and needs to maintain its views.
<b>Q14c - What would be the benefits of this?</b>
None
<b>Q14d - What evidence is available to support development in these areas?</b>
None

<b>Q15 - What should happen with the existing separation between Whitchurch village and Bristol urban area? Should we:</b>
Continue to protect the Green Belt gap & keep the village separate?
<b>Q15 - Please give reasons for your answer</b>
People need to feel that they are close to the open countryside for their general well being. Filling the green spaces with buildings would ruin the environment and appearance of the area.

<b>Q16a - How could the existing village centre be enhanced to cater for the needs of an increased population?</b>
Better services.
<b>Q16b - How do we best integrate new local centre and facilities with the existing communities?</b>
Difficult to say.

<b>Q17a - How can we improve the quality of green spaces, and ensure that people have better access to recreational facilities...</b>
Less houses.

**Q17b -How could we make more of Stockwood Vale or Maes Knoll as important environmental assets to the local area? Could...**

Not sure.

**Q18b - How can we encourage greater use of public transport?**

Frequency of buses and trains and subsidised fares.

**Q18c - How can we encourage people to be more active, more often?**

Create safer areas with less pollution.

**Q19 - What sort of employment would be suitable as part of the new development and how much?**

Build more accommodation that is suitable for working from home from.

## Development Precedents

**Q20b - What aspects should we seek to avoid?**

Any development without a fully costed transport infrastructure.

## Respondent

<b>Company</b>	Corston Parish Council
<b>Name</b>	John Twist Chair Corston Parish Council

## Vision and Spatial Priorities

**Q1 - Have we identified the critical issues facing the District over the next 20 years?**

No

**Q1 - Please give reasons for your answer**

Please see additional comments.

**Q2: Are the suggested spatial priorities the right ones?**

Yes

## Spatial Strategy Options

**Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?**

Please see additional comments.

**Q4 - Are there any other approaches/scenarios you think should be considered for accommodating non-strategic growth in B&NES**

Yes

**Q4 - Please give reasons for your answer**

Please see additional comments.

<b>Q5a - Have we considered all the issues?</b>
No
<b>Q5a - Please give reasons for your answer</b>
Please see additional comments.
<b>Q5b - What other evidence do you think we need to consider?</b>
Please see additional comments.

### Strategic Development Location: North Keynsham

<b>Q6a What are your views on the vision and objectives?</b>
Agree with the statement
<b>Q6b What type of place should be created here?</b>
All necessary amenities, services and efficient public transport links.

<b>Q7a - What do you think of the proposed road alignment?</b>
Please see additional comments.
<b>Q7b - Do you have any views on the existing crossing points? Have you got any thoughts on the overall movement strategy?</b>
Please see additional comments.

<b>Q8a - What do you think of the proposed approach to the street network and wider connections?</b>
Please see additional comments.
<b>Q8b - Do you think it is important to create a healthy neighbourhood by encouraging walking and cycling?</b>
Yes
<b>Q8b - Please give reasons for your answer</b>
This is only one aspect to create the stated objective, education in all its broadest sense is critical too.

### General

<b>Any other comments?</b>
Corston Parish Council Chair: Councillor John Twist OBE Clerk: John V May  email: corstonpc@gmail.com  31st December 2017  Subject: Corston Parish Council Combined Consultation Response for: a) West of England Joint Spatial Plan November 2017 b) B&NES Local Plan 2016-2036 Winter 2017  Reference: a) WoE Joint Spatial Plan Publication Document November 2017 b) B&NES Local Plan Issues & Options Consultation Winter 2017  1. Introduction 1.1 Corston Parish Council arranged for an Ad-Hoc Parish Meeting to take place on Thursday 14th December to review the two referenced consultation documents. 1.2 The meeting's purpose was to raise overall awareness of the totality of these proposals, allow



Parish Councillors and Parishioners to identify local factors in relation to the proposals, offer ideas that have the potential to add value or, highlight shortcomings that require further consideration by the Authorities concerned before either of these plans are adopted.

1.3 After a wide ranging discussion and general agreement on the long-term benefits of the proposals, the meeting agreed to restrict comment to those aspects of the two documents that have the potential to adversely impact on the local environment. Namely increased traffic congestion on Main and Secondary roads including the A39 and A4 transport corridors, options for non-strategic development in the B&NES region and the Unitary Authority's on-going HELAA initiative.

1.4 Considering that Corston is a small rural village the meeting was well attended.

## 2. Strategic Development Proposals

The following points are offered for JSP Policy 7.1 "North Keynsham.

2.1 The JSP strategic housing development proposed together with the existing B&NES Core Strategy allocated development site adjacent to this location has the potential to significantly increase road traffic in the local vicinity and particularly on the A4 transport corridor between Bath and Bristol.

2.2 Up to a point, it was recognized that the JSP does mitigate this with the introduction of much improved public transport links between Keynsham and Bristol which includes a Metrobus service, the multi-modal link connecting A4, and A37, the South Bristol link road and the relocated Park & Ride facility for Bristol at Hicks Gate. As a result the transport links between Bristol and Keynsham should be much improved.

2.3 However it is inconceivable that those living in the new dwellings at North Keynsham will all travel West to the Bristol area. It is considered that a significant proportion will travel East on the A4 towards Bath using business, commercial or private vehicles. As this is not addressed in either consultation document, this factor is considered to be a major shortcoming of both the JSP and Local Plan for the following reasons.

2.4 The volume of traffic currently using A4 highway between the Hicks Gate roundabout and the Globe roundabout is already at or above the capacity of large sections of this major transport corridor and at peak times traffic congestion in Saltford regularly causes long tailbacks of slow moving or stopped vehicles in both directions.

2.5 Likewise the volume traffic using both the A39 through Corston and the classified Secondary road between the A4 at the Globe roundabout via Pennyquick and Rush Hill to the A367 at the Red Lion roundabout is also already above the capacity of the road with long tailbacks of slow moving or stopped traffic occurring at peak times.

2.6 Consequently it is considered a significant shortfall that the stated JSP policies and the Local Plan fail to recognize and offer any mitigating solution to these long-standing traffic congestion problems. It is proposed that the Joint Transport Study now focuses on these particular and significant traffic congestion issues and develops effective proposals to overcome these long-standing problems.

2.7 Before starting any housing development at North Keynsham the critical issue of traffic congestion as identified above requires to be resolved.

2.8 The Local Plan consultation document Diagram 9: North Keynsham shows at item 17, a Metrobus linking Bristol to Bath, however the JSP Policy 7.1 at paragraph iv only introduces a Metrobus route from Bristol to Keynsham on the A4 corridor.

2.9 The policy requirement to have a Metrobus link between Bristol and Bath appears to be missing from the JSP and it is considered that this is a policy shortcoming that needs resolution. Additionally a new Park & Ride facility at North Keynsham was considered an essential addition to help encourage Bath bound travellers from the surrounding area to use public transport.

The following points are offered for JSP Policy 7.3 "Land at Bath Road Brislington

2.10 The relocated Brislington Park & Ride at Hicks Gate should be of sufficient size to accommodate not only commuters who wish to use public transport but also those whom car sharing is the only viable option.

2.11 From local experience it is concluded that small rural communities adjacent to major transport corridors suffer excessive on-street parking during working hours as a consequence of car sharing,

probably because traffic congestion prevents easy access to existing Park & Ride facilities.

### 3. Non-Strategic Development Proposals

The B&NES Local Plan 2016-2036

3.1 The B&NES Local Plan offers 3 Options to consider for non-strategic growth and asks which is considered to best accommodate the requirement.

3.2 It was concluded that there is no one answer that effectively resolves this issue.

3.3 Two of the most important factors to consider are the provision of affordable dwellings in rural communities and realistic public transport links that establish dependable services for travel to further education and employment locations.

3.4 If circumstances prevent current and future generations of local young people from becoming active members of the rural communities where they live, these villages will quickly become dormitory locations for those who work in the high-tech and well paid businesses the authorities seek to attract to the major conurbations.

3.5 Each of the options offered has some merit and the creation of realistic and effective Neighborhood Plans is considered to be an important element in determining an optimal solution. The ongoing B&NES Housing and Economic Land Availability Assessment exercise (HELAA)

3.6 Corston Parish Council addressed the proposed local sites during the October 2017 confidential consultation. Now that the location of these sites is in the public domain, the conclusions submitted in October are attached for wider information.

### 4. Conclusion

4.1 Before development commences at North Keynsham, the identification and implementation of measures to effectively mitigate the existing serious traffic congestion on the following transport corridors is required. The A4 between the Hicks Gate and Globe roundabouts, the A39 through Corston and the Secondary Road link between the A4 Globe roundabout and the A367 Red Lion roundabout.

4.2 Further work and local consultation is required to establish the optimum and realistic locations of the sites for non-strategic development.

Councillor John Twist

Chair Corston Parish Council

Distribution:

WoE JSP Publication: CPC comments submitted online

B&NES Local Plan: CPC comments submitted on-line local\_plan2@bathnes.gov.uk

Corston PC email distribution network to Councillors and Parishioners

Attachment: Corston Parish Council's October 2017 response to B&NES HELAA 2017

Corston Parish Council

Chair: Councillor John Twist OBE

Clerk: John V May

email: corstonpc@gmail.com

28th October 2017

Subject: Housing & Economic Land Availability (HELAA) 2017

Reference: B&NES Planning Policy email dated 2nd October 2017

Introduction

As requested at reference, Corston Parish Council is pleased to comment and submit factual information regarding COR1 and COR2. These two local sites are included in the initial draft list of sites currently being considered for suitability to be taken forward for further examination as part of the HELAA 2017 initiative.

As requested, the Parish Council's comments have been recorded in the excel spreadsheet format. However there is one statement in the B&NES draft HELAA spreadsheet that Corston Parish

Council strongly objects to.

COR1

COR1 was included in the B&NES call for sites in 2008 and again in the 2013 SHLAA exercise. On both previous occasions because of a variety of serious restrictive issues this site was not selected for development. The issues that existed in 2008 and 2013 remain and indeed, some issues such as transport, volume of traffic on the A4 together with a deterioration of pedestrian safety and air pollution has markedly increased.

The following statement by B&NES is considered to be exceptionally misleading

Line 200 COR1 Tab - Transport 1

Large site to west to of Corston village and within walking distance of Corston village centre but with limited facilities (Post Office, church, pub). Within walking distance (although footways lacking and not all lit) of frequent bus services (38/39/X39) along A4 (and new A4 pedestrian crossing and cycle path) so good bus service to Bristol/Bath and cycle access to Bath. Moderate to good site in accessibility and sustainability terms. No showstoppers or significant transport, highways or access implications.

Corston PC's response

a) Recognizing that where footpaths in the village exist they are generally quite narrow and mainly not lit. The limited facilities in the village that are within realistic walking distance of COR1 are the village shop, the post office, the playing field, the church and the village hall. The Wheatsheaf public house, which should be considered a local country pub rather than a centrally located village pub as implied, is situated over a mile away on the A39. This exceptionally busy highway has very restricted footpaths and walking from the village to the Wheatsheaf pub should not be considered a particularly attractive activity given the speed and volume of fast moving traffic.

b) Regarding the comments on the A4, as there are no controlled pedestrian crossings, or a footpath or bus stops on the south verge of this section of the A4 (adjacent to COR1), to reach the bus services, pedestrians will need to cross this very busy road using the central pedestrian refuges. Even now, due to the very high volumes of fast moving traffic using this section of road, currently villagers are invariably stranded in the center of the A4 with traffic passing in front and behind them at 50mph or even faster. This is a most dangerous situation.

c) As mentioned in the B&NES statement, the new pedestrian controlled crossing and the start of the cycle path serving the A4 exist, but these are located at the Globe roundabout, which is about a mile east of COR1. There is no cycle path on the A4 between Saltford and the Globe roundabout and, the only footpath on the A4 serving COR1 is across the road on the north side of this busy highway. Consequently access to and from COR1 for pedestrians and cyclists is considered to be exceptionally poor.

d) Site accessibility for vehicles is not considered to be moderate to good as stated. It is exceptionally poor.

The access from Corston Lane is totally unrealistic for the size of the development proposed. The lane is little more than a single carriageway from the village centre to the A4 and has no designated passing places. Two-way traffic can only pass on an opportunity basis when space allows a vehicle to move over, occasionally by mounting the very narrow pedestrian footpath.

Vehicle access from COR1 onto the A4 is considered even more problematic. Primarily caused by the high volume of fast moving traffic, or conversely, at peak time the traffic is very slow moving or at a standstill due to congestion in Saltford. The addition of a large number of new dwellings at COR1 will unacceptably exacerbate the volume of traffic on a section of road that is already regularly at or over its capacity. The already unacceptable risk from air pollution from the slow moving traffic will rapidly get worse.

Conclusion

Corston Parish Council comments have been added to the excel template as requested.

However given the above and other recorded comments regarding COR1, it is considered that the

suitability recorded for this site in the Overview matrix-2 spreadsheet line 56 should be amended from Amber to Red as not suitable and COR1 now excluded from HELAA 2017.

Councillor John Twist

Chair

## Respondent

<b>Company</b>	Deeley Freed Estates
<b>Name</b>	Chris Hays

## Vision and Spatial Priorities

### Q1 - Have we identified the critical issues facing the District over the next 20 years?

No

### Q1 - Please give reasons for your answer

Deeley Freed Estates agrees with the identified critical issues but recommends the following additional critical issues for inclusion:

Changing Local Population & Housing Needs

â€¢ Ongoing pressure for conversion of dwellings to HMOs in parts of Bath to meet student accommodation demands, and maximising the potential for purpose built student accommodation to relieve pressure on conversion of traditional housing stock.

â€¢ Accommodating diversification of the housing market including the emergence of institutional investment in the private rented sector and other ownership models, modern construction methods (eg. modular construction), and specialist market opportunities (eg. â€œpocket livingâ€™).

â€¢ Maximising the contribution from surplus public sector land, including embracing innovative and flexible forms of development (eg. building over public car parks).

Economy

â€¢ Recycling of employment sites and premises that are vacant/under-used, no longer fit-for-purpose, or otherwise of no interest to the market in order to meet other spatial priorities and market requirements including housing needs and uses that support economic prosperity and diversity (eg. hotel and retail uses).

â€¢ Meeting the academic and associated growth requirements of Bathâ€™s universities in support of the B&NES and West of England economies.

â€¢ Meeting the needs of innovative start-up businesses and encouraging the retention of graduate talent through a flexible approach to spatial policy that enables investment and development in contemporary employment floorspace linked to the universities.

### Q2: Are the suggested spatial priorities the right ones?

No

**Q2 - Please give reasons for your answer**

Deeley Freed Estates agrees with the identified spatial priorities but recommends the following additional priorities for inclusion:

3) Facilitate a strong productive, diverse and inclusive economy

â€¢ Plan to meet the development needs of the universities and spin-off businesses in support of prioritised growth in knowledge-based economic sectors and wider economic prosperity.

â€¢ Provide a flexible approach to the alternative use/development of employment sites and premises that are not critical to the maintenance of an appropriate supply of such sites and premises, in support of other development needs and market demands.

4) Meet housing needs arising from a changing and growing population

â€¢ Facilitate the sustainable provision of purpose-built student accommodation that contributes towards meeting the growth requirements of the universities and other educational establishments and which will have a positive impact in terms of reducing the need for HMOs.

â€¢ Facilitate diversification of the housing market through modern and innovative forms of housing development and operating models, including embracing new market approaches to the provision of affordable housing (eg. discounted market rent and sale models).

**Housing Needs and Student Accommodation**

**Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...**

Deeley Freed Estates (DFE) welcomes the Council's acknowledgement at this preliminary stage of the significant implications of student accommodation pressure in Bath and its importance to the spatial strategy for accommodating overall housing requirements. It is vitally important that the development needs of the Universities, including meeting student accommodation requirements, are met in full in support of the B&NES and wider West of England economies. Furthermore, the spatial strategy can and should play an important role in reducing the pressures on established communities through policies to facilitate purpose-built student accommodation (PBSA) of the right types and in the right locations (in conjunction with the recent SPD that places further restrictions on HMO).

The consultation document sets out a number of policy options for addressing the demand for PBSA in order to "help stimulate discussion". DFE makes the following general comments at this stage:

â€¢ As a general point of principle, housing policy for Bath should be formulated on the basis that student accommodation forms a vital component part of the overall housing requirement. The PPG is clear in advising that dedicated student accommodation takes pressure off the private rented sector and increases the overall housing stock. This is especially relevant in Bath where there is ongoing pressure for HMO conversions in established communities. Having regard to the NPPF and PPG, PBSA development should not necessarily be viewed as a "con" (if it leads to the loss of "normal" housing land) since it will be contributing to overall housing supply in the City. DFE encourages the Council to provide a policy basis that pro-actively seeks to ensure that student accommodation needs are met in full alongside other housing requirements.

â€ The current policy approach (specifically Core Strategy Policy B5) provides reasonable flexibility in the provision of PBSA. However, by placing a blanket restriction on PBSA (and academic space) in the Central Area and Enterprise Area, such development is potentially being dispersed to less accessible and sustainable locations in Bath, whilst driving ongoing demand for new HMOs in established communities by limiting options. On the basis that students are actively discouraged to make use of private cars, it is sensible to locate PBSA and academic space centrally within the City. As such, it is considered that future policy should provide added flexibility for PBSA and academic space proposals to be considered on their own merits in all parts of the City, including the Central Area and Enterprise Area (especially owing to the Universitiesâ€™ vital importance to the local economy and established links with the business community).

â€ There is no policy justification for restricting new PBSA to â€œon-campusâ€. The Student Accommodation Background Paper clearly shows that on-campus supply is likely to fall well short of projected demand which, in the absence of new off-campus PBSA development in the City, will result in significant increased pressure on the private rented sector and demand for HMOs.

â€ Tying the provision of new academic space with the provision of additional student accommodation will place an unnecessary restriction on the Universities, especially as there is not necessarily a correlation between the provision of new academic space and additional demand for accommodation. Nevertheless, the new Local Plan should be supportive of new university hub projects in sustainable locations that provide both academic space and accommodation.

Overall, DFE encourages the Council to provide a flexible policy basis for the provision of academic space and PBSA in support of the ongoing growth and prosperity of the Cityâ€™s universities, thus ensuring that the needs of the Universities can be met in full over the Local Plan period.

## General

### Any other comments?

#### Hotel Policy

Established policy seeks to meet the entire identified need for hotel development in Bath in the Central Area (Policy B2). Whilst this approach has been partially successful in driving improvements to the range and choice of visitor accommodation in the City Centre, there is untapped potential to further improve and diversify hotel facilities in the City and address specific operator requirements in support of the local economy. In this regard, DFE is aware of strong market interest from operators seeking prominent and accessible locations outside the Central Area but within the Riverside Enterprise Area.

The Bath Hotel Study (2015) advises that whilst the City Centre should continue as the focus for upscale/full service hotel development, it also advises that budget/limited service and aparthotel development can be more appropriately developed and steered towards edge-of-City Centre and riverside sites, along with budget hotel development in outer locations that are well-served by public transport. This approach has some support from the PPG which advises that application of the sequential approach should recognise that certain â€œmain town centre usesâ€ have particular market and locational requirements.

Deeley Freed Estates (DFE) encourages the Council to adopt a flexible policy approach to hotel development in Bath that will be permissive of hotel proposals outside the Central Area where there is adequate justification. In particular, hotel development within the Riverside Enterprise Area can

have a positive impact on its attractiveness as an investment and occupier location, whilst still being accessible to the City Centre.

#### Housing Policy

As highlighted in respect of the ‘‘Critical Issues’’ and ‘‘Spatial Priorities’’, DFE considers that it is essential for Council housing policy to embrace a diversifying housing market including the emergence of institutional investment in the private rented sector and other ownership models (including affordable housing models), modern construction methods (eg. modular construction), and specialist market opportunities (eg. ‘‘pocket living’’). This will in some cases require flexibility in the Council’s approach to securing affordable housing and in the application of design and placemaking policies (eg. space standards). Diversifying the housing market forms an important pillar of the Government’s approach to boosting housebuilding, as set out in its White Paper ‘‘Fixing our Broken Housing Market’’ and associated policy initiatives.

DFE commends the flexible approach taken by the Council in the determination of its proposals for the Roseberry Place regeneration site in Bath, where the first phase of housing development for the private rented sector is currently under construction. In this case, DFE and the Council worked together to secure the viable delivery of current policy-compliant affordable housing (discount market rent model) for the first development of this scale and type in the City. This is an example where flexibility in approach is leading to the early delivery of much need housing suited to the prevailing investment and occupier markets.

DFE encourages the Council to provide housing policies that encourage diversification and which provide the flexibility to bring forward innovative and viable housing schemes, particularly on challenging urban brownfield sites. This approach will have an overall positive effect on meeting housing requirements by stimulating increased market interest and activity, particularly in terms of urban living in Bath.

#### Employment Policy

DFE supports the Council’s spatial priority of maintaining an appropriate supply of business land and premises. However, in accordance with the NPPF and PPG, this should continue to go hand-in-hand with employment policy that allows for the re-use/redevelopment of employment sites that are vacant/under-used, no longer fit-for-purpose, or where there is otherwise confirmed evidence of lack of market demand. This includes land allocated for employment purposes that has failed to come forward within a reasonable period and where there is no reasonable prospect of it doing so. Bath particularly has an abundance of peripheral employment sites that hold significant potential for addressing other identified development needs. Unlocking such sites through a permissive employment policy approach will generally encourage best use of previously-developed land and promote the JSP strategy of housing growth through urban intensification in Bath. Retention of such employment sites should only be on the basis of strong and specific economic justification, without reliance on general trends in the loss of employment floorspace over time.

As highlighted in respect of the ‘‘Critical Issues’’, DFE considers that meeting the needs of innovative start-up businesses and encouraging the retention of graduate talent in Bath is essential. It is apparent that the local economy is potentially losing out owing to the very low proportion of graduates who choose to stay and establish businesses in Bath, which is partly attributable to a lack of suitable, attractive and affordable employment space. It is important to ensure that spatial policy in Bath does not potentially inhibit investment and development in contemporary employment floorspace directly linked to the universities’ operations and talent pool.

## Respondent

<b>Company</b>	Dunkerton & Tunley Parish Council
<b>Name</b>	Kathryn Manchee Clerk to the Council

## Vision and Spatial Priorities

**Q1 - Have we identified the critical issues facing the District over the next 20 years?**

Yes

**Q1 - Please give reasons for your answer**

In general yes, however the identification of transport infrastructure requirements is weak, in particular the improvements to the highways infrastructure that will be required.

**Q2: Are the suggested spatial priorities the right ones?**

Yes

## Spatial Strategy Options

**Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?**

Option 3 - Dispersed approach

**Q3 - Please give reasons for your answer**

A dispersed approach across the parishes of the Somer Valley area would provide the opportunity for affordable additional new homes for young families. This would reduce the continued move towards urban living which has a significant long term effect on the viability of rural communities to survive without becoming the domain of the affluent few who wish to live in rural villages. In addition a dispersed approach would reduce the impact on the existing highways infrastructure which would be the result if a focused approach were to be adopted.

**Q4 - Are there any other approaches/scenarios you think should be considered for accommodating non-strategic growth in B&NES**

No

## Housing Needs and Student Accommodation

**Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...**

**Q21b - Are there any other options?**

The continued development of student accommodation and multiple occupancy within the city is not desirable. In particular multiple occupancy is having an adverse effect on areas such as Oldfield Park. Consideration should be given to developing student accommodation on campus, this would have the added benefit of reducing the number of student buses operating within the city.



## Respondent

<b>Company</b>	Durrell Wildlife Conservation Trust
<b>Name</b>	Jeff Dawson Amphibian Programme Manager

## Spatial Strategy Options

<b>Q5a - Have we considered all the issues?</b>
Yes
<b>Q5a - Please give reasons for your answer</b>
Principle issues are housing, sustainability - both environmental and transport, ecology (existing and enhancement)
<b>Q5b - What other evidence do you think we need to consider?</b>
Further exploration of ecological enhancement at the site and existing residents - both on boats and around the site such as world's end lane.

## Strategic Development Location: North Keynsham

<b>Q6a What are your views on the vision and objectives?</b>
In principle the vision is sound and aspirational
<b>Q6b What type of place should be created here?</b>
Sustainable, ecologically and environmentally sensitive site that promotes non-car travel for residents and connects people with nature.

<b>Q7a - What do you think of the proposed road alignment?</b>
Road usage around the site is a major consideration for the development with a number of constraints. A number of options will have to be looked at and considered as I think all will have pros and cons see below and next section One consideration is flooding. Broadmead Lane between the waste water works and industrial estate is flooded when the river bursts and is often impassable when high. Diversion of broadmead beck as indicated may result in flooding higher up on new road.  Until access to site is adequately resolved then further increased development is
<b>Q7b - Do you have any views on the existing crossing points? Have you got any thoughts on the overall movement strategy?</b>
They are inadequate for the existing vehicle loads let alone increased usage which this development would entail. Heavy vehicle use (skip lorries, trucks etc) of Broadmead lane has increased significantly since I first moved there 4.5 years ago, primarily due to the expansion of Bateman's and Alide plant hire businesses on the industrial estate. Tall vehicles are unable to pass under the railway on Broadmead lane so have to go along Stidham lane and over Pixash lane. These heavily impact the roads creating numerous potholes and make it more unsafe for pedestrians. During the week at evenings around 5pm there are often significant queues of cars trying to get onto the A4 at the Waitrose roundabout, frequently backing up into Ashmead road. Pixash lane often has parked vehicles on both sides narrowing access. When Avon Valley has events on e.g. Halloween, Christmas especially one off night time events access can get clogged.

<b>Q8a - What do you think of the proposed approach to the street network and wider connections?</b>
Increasing access to the site is vital if want to avoid queues. Have to take into consideration large number of heavy vehicle traffic for the industrial estate

**Q8b - Do you think it is important to create a healthy neighbourhood by encouraging walking and cycling?**

Yes

**Q8b - Please give reasons for your answer**

Important for health and mental well-being and to encourage public transport use and cycling. Improving connectivity to the Bristol-Bath cycle path would be very important (currently have to cycle along the A4 to Saltford which whilst only 1 mile on the A4 will put off many people)

**Q9a - What do you think of the proposed response to landscape impact, especially considering views from the Cotswolds?**

Building any housing development will have an impact on landscape. However it can be mitigated through design, density and planting. Given the site is already bookended by Avon Valley Farm and Industrial estate this would reduce impact. From personal ex

**Q9b - How can we improve the Green Infrastructure network through the site?**

Green infrastructure should be an integral component of the development. Use of SUDS in the development will help with flood attenuation and provide green spaces. Planting should be done using native species including wildflower to encourage pollinators. Enhancement of existing habitats and creation of landscape appropriate habitat including wet woodland, floodplain meadows etc should be done. Mitigation for loss of habitat needs to be done e.g. field earmarked for residential has a number of breeding skylarks. Features to promote wildlife should be incorporated as standard including but not exclusively bat boxes, bricks in houses, swift boxes. Incorporating green corridors through the site would encourage wildlife to be able to move through it.

**Q10a - What should the housing mix comprise of?**

As mentioned in the proposal plus residential mooring - see below.

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

In addition residential mooring should be incorporated in the plan as there is a massive lack of this in the area (and nationally). The proposal states that in the new marina there would be provision for residential mooring which is encouraging. I would a

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

Yes

**Q11a - Please give reasons for your answer**

This should be a fundamental requirement for any new development moving forward given the climate issues we are all facing. To not aim for it would be negligent.

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

Very ambitious - is an opportunity to showcase that such a development can be done in the UK and be a real bonus for BANES if achieved.

Fundamentally ensure all houses are fully insulated to reduce heating costs. Selection of construction materials to reflect this ethos e.g. recycled. All buildings to have solar panels or photovoltaic cells on roofs to provide electricity / heat water. Other renewable energy generation and storage options (e.g. small individual wind turbine per building, battery bank in house to store that generated) to be considered

Rainwater harvesting and reuse to reduce water usage. Extensive use of green / brown roofs

Whilst not necessarily zero carbon, consideration of future increased flood events on site need to be considered. Those dwellings in higher risk flood areas built from half ground floor / first floor up so that is there is severe flooding no damage to living space only storage.

<b>Q12a - How can Avon Valley Wildlife &amp; Adventure Park be best integrated into the new development?</b>
Has to be incorporated in consultation with owners
<b>Q12c - Do you agree with the requirement to link with the Bristol to Bath cycle path?</b>
Yes
<b>Q12c - Please give reasons for your answer</b>
Fundamental to encourage cycling and commuting to Bath / Bristol by bike.

## Respondent

<b>Company</b>	East Harptree Parish Council
<b>Name</b>	Alan Butcher Parish Clerk

## Spatial Strategy Options

<b>Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?</b>
Option 1 - Continue the existing hierarchical approach
<b>Q3 - Please give reasons for your answer</b>
It is the view of the Parish Council, that the current “broad brush” approach is insufficient to assess properly whether East Harptree is suitable for and could accommodate additional future developments. If a more sophisticated measure of sustainability is used, reflecting the items mentioned above, then on balance, we would marginally prefer Option One.

<b>Q4 - Are there any other approaches/scenarios you think should be considered for accommodating non-strategic growth in B&amp;NES</b>
Yes
<b>Q4 - Please give reasons for your answer</b>
<p>Having reviewed the measures for sustainability proposed to assess the suitability of villages such as East Harptree for further development, and to be included in the forthcoming update to the Local Plan, the Parish Council considers that these measures are too broad to allow a proper evaluation as to the suitability or otherwise of East Harptree and other small villages, for future development.</p> <p>Explanation: Whilst we can see some merit in aspects of Options 1 and 2, and Option 3 could appear “fair” to some, we find it very difficult to choose one of these three scenarios as they all depend upon the assessment and consequent scoring of facilities and other elements that do not include key elements that we consider to be essential when assessing our future sustainability. The Parish Council considers that all of the following elements must be taken into account and we request that they should be written into the Local Plan. We also note below the significance of their inclusion as part of any sustainability assessment of future development in East Harptree:</p> <p>Parking and Accessibility “ The roads around East Harptree, which is on a hill-side, are narrow and often restricted by on street parking, causing difficulties for large vehicles and agricultural tractors and equipment. A current small housing development in the village has caused chaos and left village roads covered with mud.</p> <p>Pedestrian Safety “ Many roads and lanes around East Harptree do not have pavements. For instance, the route between the school and the playing field where games take place is along the High Street, the main route into the village from the north, and has no pavements. An increased</p>

volume of traffic would increase the possibility of accidents along this already dangerous route. Public transport “ This is very limited in the area and additional developments will only serve to increase the volume of traffic on local roads.  
 Utilities and services “ These are at or near capacity and would require a major upgrade should more housing be proposed.  
 Local employment “ There is little local employment in East Harptree meaning that additional development would add to the volume of commuters using the already congested roads in the area.

Context: Currently twenty plus houses are planned or under construction in East Harptree and in addition there will inevitably be “infill” developments that will further increase the housing provision within this parish. Proposals for further development must be taken in the context of the current village, ongoing infill and windfall developments, and its ability to sustain further development.

## Respondent

<b>Company</b>	Federation of Bath Residents' Associations (FOBRA)
<b>Name</b>	Nicholas Tobin

## Vision and Spatial Priorities

<b>Q1 - Have we identified the critical issues facing the District over the next 20 years?</b>
No
<b>Q1 - Please give reasons for your answer</b>
<p>The vision presented is of Bath offering a splendid life style and being internationally renowned, yet no framework is presented for developing world class management of the heritage nor of the urgently required bespoke transport system.</p> <p>The emphasis in the Local Plan consultation is on substantial developments proposed for areas beyond the city, and the priority given for housing is clear. FoBRA supports both the general strategy of expansion of the villages North Keynsham and at Whitchurch and the strategy of focusing development in settlements that are served by existing public transport and cycle routes (or perhaps also where infrastructure can readily be provided). The issue of local facilities, especially schools lacking capacity or space to expand is a difficult one, but further investigation might identify potential in some cases for nearby settlements to share facilities where there are good links for walking, cycling or “busing”. However, while a Joint Transport Study has been prepared other references to transport are vague, noting that improvements are needed and specifying walking and cycling rather than investment in modern, sustainable systems. However, these references are mainly linked to major new housing developments outside Bath. Disappointingly, the challenge of resolving the acute levels of congestion and pollution which the city already faces are not addressed, even though a number of large housing estates are already under construction, together with the emerging enterprise area, but with little linked investment in public transport, roads or parking. At present it seems there is no money available even to keep the central area streets and pavements in a decent state of cleanliness and repair. FoBRA considers it would be helpful to know for Phase 2 consultation what traffic growth forecasts B&amp;NES is working to. There is acknowledgement that transport investment should be in tandem with housing development, given the urgent political pressure for housing, but FoBRA is bound to be sceptical and would wish to know how tandem transport “ and other necessary- investment will be ensured before the first housing sod is turned!</p>

For the next Phase 2 iteration it would be helpful for B&NES to include detail of the new regional mayor's powers and budget for transport and housing and how these will benefit the city. The map at page 8 shows a metrobus system from Bristol to Keynsham. At an LEP presentation some 18 months ago the metrobus was described as linking the centre of Bristol to the centre of Bath and continuing to Bathampton. FoBRA will press for more detail. Perhaps, as with electrification, plans are being cut back.

**Q2: Are the suggested spatial priorities the right ones?**

Yes

## Spatial Strategy Options

**Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?**

Option 2 - Focussed approach

**Q4 - Are there any other approaches/scenarios you think should be considered for accommodating non-strategic growth in B&NES**

No

**Q10a - What should the housing mix comprise of?**

Agree proposals, but FoBRA would press for minimum room size requirements because we don't want to be building the slums of the future when Bristol has already introduced space standards. All this may change if, as has been reported, B&NES is going to r

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

FoBRA would not support development of more purpose built student accommodation in Bath; the city is saturated. Universities should be invited to build more student accommodation on campus.

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

Yes

**Q11a - Please give reasons for your answer**

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

B&NES should be both brave and ambitious!

**Q12c - Do you agree with the requirement to link with the Bristol to Bath cycle path?**

Yes

## Housing Needs and Student Accommodation

**Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...**

In her recent retirement statement, the Vice-Chancellor of the University of Bath (UoB) commented that the university had "almost tripled in size" since 2001 "and will go on to be even greater".

Maximising their income through decades of unbridled expansion combined with a history of offering only about a quarter of their students university-managed accommodation, both of Bath's universities have contributed to Bath's hosting one of the highest proportions of students per head of population in the UK (already in excess of 25%). For years communities have

been highly unbalanced in several parts of the city, there is a chronic shortage of affordable housing plus a feeding frenzy of student accommodation blocks in and around the city centre on land that could otherwise be used to ease Bath's housing shortage. A glance at Table 2 shows that 11,700 students relied on private-sector accommodation in 2016/17 and that this could rise to 13,200 within 3 years.

FoBRA has long called in vain for a workable Student Housing Policy to bring this undesirable state of affairs under control and feels strongly that the time has come for B&NES to get tough with the universities. As stated at para.6.15, in other university cities and towns (e.g. Oxford) policies are in place that require further student accommodation to be provided by the universities before planning permission is granted for additional academic space. FoBRA calls on B&NES urgently to put in place something similar in Bath.

For example, Table 2 confirms that the universities provide, and intend to continue to provide, only about a quarter of their students with bedspaces, leading to a demand for about 1,500 further beds in the private sector (equivalent to about 375 more HMOs) by 2020/21. If the universities were required to provide accommodation for just a third of their students (rather than a quarter), this would have the effect of freeing-up almost 700 private-sector bedspaces (170 HMOs) in stark contrast to the Table 2 forecast of a need for 1,500 more private-sector bedspaces (375 HMOs) by 2020/21.

As a matter of detail, FoBRA would be interested to learn exactly where the universities propose to site the 1,421 bedspaces by 2020/21 cited in Table 2. For example, UoB is soon to open Polden Corner (293 bedspaces) but FoBRA is unaware of any specific plan to provide further bedspaces beyond that development.

Having stated that, the extant UoB Masterplan (2014 update, to 2026) includes provision for 2,400 new study bedrooms, of which only 1,000 will have been built when Polden Corner opens in Autumn 2018. Hence, there remains scope to build a further 1,400 bedspaces within the confines of the current built campus (i.e. not within the Green Belt or the Cotswolds AONB) as defined in the 2014 Masterplan update, with scope for many hundreds more if General Development Principle (h) of the B&NES Placemaking Plan (PMP) Policy SB19 is heeded and UoB employs decked parking in place of the extensive surface campus parking currently in use.

FoBRA notes from Table 3 (Options for responding to the universities' growth and student accommodation demand) that a revised UoB Masterplan is in preparation, and wishes to emphasise its strong recommendation that no consideration should be given to either releasing further Green Belt land (or compromise the protection of the Cotswolds AONB) to facilitate the provision of more UoB student accommodation while copious options exist to satisfy all foreseeable demand for additional bedspaces within the existing core campus.

FoBRA response to Options 1-5 presented in Table 3:

Option 1. Non-preferred as it discourages on-campus development and continues with unacceptable pressure for more HMOs.

Option 2. Non-preferred as it discourages on-campus development and would lead to loss of land that could otherwise be developed for much-needed residential housing for the citizens of Bath.

Option 3. Preferred (in combination with Option 5 below). For the reasons given above, FoBRA strongly recommends that the universities are required to provide accommodation for more than a quarter of their students. There is adequate scope to do so within the existing core campus for the foreseeable future, i.e. without further compromising Green Belt or AONB designations.

Option 4. Non-preferred as it unnecessarily compromises Green Belt (and thereby coincident CotswoldsAONB) land (which should be afforded the “highest status of protection” NPPF para.115). NPPF (para.116) requires that an assessment of the scope to develop elsewhere is undertaken before any major development is permitted in an AONB. No such assessment has been undertaken in respect of General Development Principle (h) of PMP Policy SB19 which seeks to optimise campus development capacity by employing decked parking. Decked parking features nowhere in the UoB campus Masterplan.

Option 5. Preferred (in combination with Option 3 above). For the reasons given above, FoBRA strongly recommends that the universities are required to provide accommodation for more than a quarter of their students and that, like Oxford, planning permissions for additional academic space should be conditional upon the universities providing student accommodation-campus such that residual demand for private-sector student accommodation is limited to (and preferably reduced from) current levels.

#### Q21b - Are there any other options?

In summary, FoBRA prefers a combination of Options 3 and 5 As follows:

##### Option 6

Further academic space must be supported by the provision of additional student accommodation on-campus (including 2nd & 3rd year students)

##### Pros:

- Enables strong protection of employment and housing land
- Additional academic space will need to be matched with student accommodation provision on campus
- University of Bath 2014 Masterplan update identifies sufficient scope for additional student accommodation for the foreseeable future.

##### Cons

- Potentially limit or constrain university growth
- University of Bath - A revised masterplan is in preparation.
- Bath Spa University “limited on-campus capacity

## General

#### Any other comments?

This online submission does not allow the inclusion of footnotes in support of our answer to Q21a, so I shall send these separately by email.

## Respondent

<b>Company</b>	Hengrove & Whitchurch Neighbourhood Planning Forum
<b>Name</b>	Andrew Gamlin

## General

<b>Any other comments?</b>
<p>As Co-Chair for Hengrove &amp; Whitchurch Park Neighbourhood Planning Forum designated by Bristol City Council, I have the following concerns relating to the proposed Link Road proposed to join up to the new South Bristol Link Road:</p> <ul style="list-style-type: none"> <li>- From the map it is not clear where the proposed link road will join up to the west of Whitchurch village although I have heard it is proposed to join up with Whitchurch Lane via Halfacre Lane with a new road junction. Halfacre Lane and the surrounding roads are too narrow for carrying heavy traffic and a Metrobus. I would not wish to see land taken to widen these roads or indeed houses compulsory purchased. Residents will be severely impacted.</li> <li>- Whitchurch Lane is a 20mph zone and too narrow to carry an increase in traffic from a Link Road and has traffic calming measures in place. This road is already under pressure from heavy traffic volumes. Increases in traffic will impact and slow down the whole southern area of Hengrove and Whitchurch Park ward. The area will be seeing an increase in housing of up to 4000 new homes which will impact local traffic. A link road joining Whitchurch Lane will cause it to come to a standstill.</li> <li>- Increased traffic will bring increased pollution, additional noise and road safety concerns. There is a nearby school, allotment and play park. Users of these facilities will be at risk from pollution.</li> </ul> <p>There is a need for a South Bristol Ring Road, however the proposed Link Road is not the answer. It needs to join up with the A38 itself and properly thought out. I appreciate there are areas of interest south of Bristol but the road can be hidden within a tunnel where necessary as they do on the continent. The Hengrove &amp; Whitchurch Park Neighbourhood Forum will not support this proposal in this form and we urge BANES to reconsider.</p>

## Respondent

<b>Company</b>	Hunter Page Planning
<b>Name</b>	Guy Wakefield

## Spatial Strategy Options

<b>Q5a - Have we considered all the issues?</b>
Yes
<b>Q5a - Please give reasons for your answer</b>
There is a sound evidence base which considers all relevant issues.
<b>Q5b - What other evidence do you think we need to consider?</b>
N/A



## Strategic Development Location: North Keynsham

### Q6a What are your views on the vision and objectives?

We would support the vision and objectives of the proposed development in terms of opening up the site to become a well integrated new neighbourhood which is attractive for future residents and employees and responds well to the existing environment whilst creating its own sense of place. We support the current location of development with its mix of uses and relationships between them along with the extent of housing. We would also support the proposals for a permeable and compact neighbourhood which encourages sustainable transport modes.

### Q6b What type of place should be created here?

It should be a sustainable mixed use development which is an attractive place to live and work.

### Q7a - What do you think of the proposed road alignment?

We would suggest a re alignment of the proposed multi modal link road shown at number 3 (to the south) of diagram 9 so that it does not cross through the proposed housing development but is routed around it to the eastern edge of the development to provide a more recognisable boundary to the green belt and in doing so this will free up more land for development.

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

In terms of the deliverability of the multi modal link road throughout the site it is suggested that the amount of housing proposed is essential to its delivery and the other infrastructure and mitigation measures required.

### Q8a - What do you think of the proposed approach to the street network and wider connections?

Support.

### Q8b - Do you think it is important to create a healthy neighbourhood by encouraging walking and cycling?

Yes

### Q8b - Please give reasons for your answer

To enhance the sustainability of the development.

## Respondent

<b>Company</b>	I J McGill Transport
<b>Name</b>	Kelly Pope

## Vision and Spatial Priorities

### Q1 - Have we identified the critical issues facing the District over the next 20 years?

Yes

### Q2: Are the suggested spatial priorities the right ones?

No

## Strategic Development Location: Whitchurch

### Q14b - Could some development take place in other areas outside of this broad development location?

Queen Charlton is an area of natural beauty building in the area will be a terrible thing. The village

will be highly affected by the traffic increase which would be an issue as the village is already used as a rat run between Keynsham and Whitchurch.

## Respondent

<b>Company</b>	Keynsham Town Council
<b>Name</b>	Dawn Drury

## Vision and Spatial Priorities

### Q1 - Have we identified the critical issues facing the District over the next 20 years?

No

### Q1 - Please give reasons for your answer

there needs to an increasing awareness of the artificial intelligent fact and the possibility of future loss on particular types of employment. This needs to be account for by ensuring that there is a provision of service/support jobs to oversee roles taken on by machines, computers and robots.

### Q2: Are the suggested spatial priorities the right ones?

Yes

### Q2 - Please give reasons for your answer

The spatial priorities are well inter-linked but one should not lose sight of the fact that public transport should be free or much cheaper for some people to take advantage of accessible means of transport.

## Spatial Strategy Options

### Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?

Option 1 - Continue the existing hierarchical approach

### Q3 - Please give reasons for your answer

We must build on this current practice.

### Q4 - Are there any other approaches/scenarios you think should be considered for accommodating non-strategic growth in B&NES

Yes

### Q4 - Please give reasons for your answer

Look to the river course as an opportunity for alternative residential river developments.

### Q5a - Have we considered all the issues?

No

### Q5a - Please give reasons for your answer

Access to Keynsham station has not been considered to date. Existing access is poor and conflicts with the spatial priorities wherein the Local Plan refers to the delivery of connected places that are accessible by public transport, walking, cycling and on foot. it is logical that this needs to happen.

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

Ensure that there is enough employment to ensure that there is a sufficient balance of employment development and housing development.

The North Keynsham site is full of business potential and a thorough assessment needs to be carried

out to ensure that plans that come forward take this into consideration.

## Strategic Development Location: North Keynsham

### Q6a What are your views on the vision and objectives?

In addition to the North Keynsham site having coherence and a real sense of identity and place it must be fully integrated with the whole of Keynsham. The railway line must not form a division for the site from the rest of Keynsham. There must be strong links and connections between the north of Keynsham and the rest of the town.

### Q6b What type of place should be created here?

A place that is fully in line with the proposed vision.

### Q7a - What do you think of the proposed road alignment?

Keynsham Town Council MUST be consulted throughout on any proposals in respect of the alignment of the proposed route. The council's local knowledge and input is essential to ensure that the best route is finally adopted.

Currently, the Town Council believe that the road does not extend far enough along the A4 to the East. Some suggestions are that it should perhaps skirt around the Glenavon Farm or even part of Saltford.

The siting of the roundabout should be slightly further east along the A4 as this will then allow easier access from the new vehicular access proposed for the K4 Keynsham east development. Without this it is envisaged that the traffic flow will be restricted making access onto the A4 from side roads virtually impossible.

A river crossing could be an option for consideration linking the proposed road to the A4175 Keynsham Road this would be alternative route for those wishing to access the Willsbridge area without having to add to the congestion on Avon Mill Lane.

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

See 7a above.

### Q8a - What do you think of the proposed approach to the street network and wider connections?

The key absence is proper access to the railway station which is due to enhanced according to the plan.

### Q8b - Do you think it is important to create a healthy neighbourhood by encouraging walking and cycling?

Yes

### Q8b - Please give reasons for your answer

Keynsham has an aging population and opportunities to keep the community healthier for longer through walking and cycling are a must.

### Q9a - What do you think of the proposed response to landscape impact, especially considering views from the Cotswolds?

The proposal in respect of landscape impact is fine.

### Q9b - How can we improve the Green Infrastructure network through the site?

enhancement can be made by planting indigenous trees in both green space areas and within the actual housing development.

Hedging should be layered and where possible old hedge networks should be saved.

<b>Q10a - What should the housing mix comprise of?</b>
There should be more affordable housing. A full consultation of Keynsham residents should be undertaken to ascertain what is affordable to them.
There should be a Citizens Charter for Housing Development.
<b>Q10b - Is there any scope for other forms of housing, for example student accommodation?</b>
There should be limited but specific installation of student accommodation.
An area should be designated for the purpose of self build homes (chalet bungalow - pre-fabricated) - designs to be prior approved.

<b>Q11a - Do you agree with the principle of aiming for a Zero Carbon development?</b>
Yes
<b>Q11a - Please give reasons for your answer</b>
This is being considered as part of the Keynsham NDP Plan through its Sustainability Topic Group.
<b>Q11b - How ambitious should we be? How do you think this aim could be achieved?</b>
A demonstration estate could be built in Keynsham that could be an example for other authorities. We should be as ambitious as we can and should make a conscious effort to promote this for this part of Keynsham.

<b>Q12a - How can Avon Valley Wildlife &amp; Adventure Park be best integrated into the new development?</b>
Given its locality and popularity (the 4th largest attraction in the South West)it should be integrated carefully and not to the detriment of new residents to the town. There should be careful monitoring and controls of activities permitted at this attra
<b>Q12b - What opportunities are there to minimise visual impact from the Cotswolds?</b>
Once again control of activities and strict guidance on any expansion plans.
<b>Q12c - Do you agree with the requirement to link with the Bristol to Bath cycle path?</b>
Yes
<b>Q12c - Please give reasons for your answer</b>
This is a hot topic in the Keynsham NDP transport and infrastructure topic group.

### Strategic Development Location: Whitchurch

<b>Q13a - What additional aspirations would you have here?</b>
No comment
<b>Q13b - How can this vision be delivered?</b>
No comment

<b>Q14a - Please give reasons for your answer</b>
No comment
<b>Q14b - Could some development take place in other areas outside of this broad development location?</b>
The Stockwood Vale transport approach to Keynsham is poor and congested already. It is important to keep the green infrastructure barrier between Stockwood Vale and Whitchurch.
<b>Q14c - What would be the benefits of this?</b>
No comment
<b>Q14d - What evidence is available to support development in these areas?</b>

No comment

**Q15 - What should happen with the existing separation between Whitchurch village and Bristol urban area? Should we:**

**Q15 - Please give reasons for your answer**

No comment

**Q16a - How could the existing village centre be enhanced to cater for the needs of an increased population?**

No comment

**Q16b - How do we best integrate new local centre and facilities with the existing communities?**

No comment

**Q17a - How can we improve the quality of green spaces, and ensure that people have better access to recreational facilities...**

No comment

**Q17b -How could we make more of Stockwood Vale or Maes Knoll as important environmental assets to the local area? Could...**

No comment

**Q18a - How can we enhance routes for walking and cycling, for example to Keynsham and towards Bristol?**

No comment

**Q18b - How can we encourage greater use of public transport?**

complete the ring road round around Bristol before commencing any development

**Q18c - How can we encourage people to be more active, more often?**

No comment

**Q18d - What other ideas could be explored to achieve these objectives?**

No comment

**Q19 - What sort of employment would be suitable as part of the new development and how much?**

No comment

## Development Precedents

**Q20a - What are the qualities of the places on pages 24 to 27 that could be used in either of the new development areas?**

Broad open spaces are good.

There should be a strong neighbourhood centre.

Place should be developed to allow the inhabitants to feel safe and secure. Openness will allow for this. Provision of green spaces for residents to look out onto will add t

**Q20b - What aspects should we seek to avoid?**

Enclosed and built up areas.

**Q20c - What other precedents would you use?**

## Housing Needs and Student Accommodation

<b>Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...</b>
N/A
<b>Q21b - Are there any other options?</b>
n/A

## Respondent

<b>Company</b>	Midsomer Norton Town Council
<b>Name</b>	Michael Evans

## Vision and Spatial Priorities

<b>Q1 - Have we identified the critical issues facing the District over the next 20 years?</b>
Yes
<b>Q1 - Please give reasons for your answer</b>
The Town Council particularly endorses the identification of traffic congestion and the poor accessibility to the national/regional transport network for the Somer Valley area.

<b>Q2: Are the suggested spatial priorities the right ones?</b>
Yes
<b>Q2 - Please give reasons for your answer</b>
The Town Council particularly appreciates and supports the policy to supply business land and premises in sustainable locations, focusing on the Bath and Somer Valley Enterprise Zone.

## Spatial Strategy Options

<b>Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?</b>
Scenario 1 contradicts the priority to reduce the need to travel; also it boils down to not building on the Green Belt. In the opinion of the Council this approach is outdated. It feels that Green Belt locations should be considered at an earlier stage, and the 'exceptional circumstances' justification should be used more readily. Scenario 2: This would change the character of the chosen locations and again the exclusion of the Green Belt distorts the picture. Scenario 3: This increases the need to travel, contrary to the policy to reduce private car use. The Council has difficulty agreeing with any of these approaches, for the reasons given above

<b>Q4 - Are there any other approaches/scenarios you think should be considered for accommodating non-strategic growth in B&amp;NES</b>
Yes
<b>Q4 - Please give reasons for your answer</b>
The Town Council 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. It thinks 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.

## Respondent

<b>Company</b>	Paul Traub Associates Limited
<b>Name</b>	Paul Traub

**Q9a - What do you think of the proposed response to landscape impact, especially considering views from the Cotswolds?**

Appalling and unnecessary. Brownfield sites should be used and the green belt protected.

**Q9b - How can we improve the Green Infrastructure network through the site?**

Provide cheaper more frequent bus services and built a railway station at Whitchurch.

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

Not required. No colleagues or University in close proximity

**Q12b - What opportunities are there to minimise visual impact from the Cotswolds?**

None

**Q12c - Do you agree with the requirement to link with the Bristol to Bath cycle path?**

Yes

## Strategic Development Location: Whitchurch

**Q13a - What additional aspirations would you have here?**

A railway station is needed to cut down excessive current volumes of traffic and to ensure clean air.

**Q14a - Is this the right approach?**

No

**Q14a - Please give reasons for your answer**

Please see response to 15.

**Q14b - Could some development take place in other areas outside of this broad development location?**

None

**Q15 - What should happen with the existing separation between Whitchurch village and Bristol urban area? Should we:**

Continue to protect the Green Belt gap & keep the village separate?

**Q15 - Please give reasons for your answer**

Pollution levels already exceed UK and EU guidelines and the congestion and lack of infrastructure will make it much worse. Commenting into Bristol will also take significantly longer

**Q17a - How can we improve the quality of green spaces, and ensure that people have better access to recreational facilities...**

By not building in Whitchurch village and surrounding areas

## Respondent

<b>Company</b>	Paulton Parish Council
<b>Name</b>	Jo Swift

## Vision and Spatial Priorities

### Q1 - Have we identified the critical issues facing the District over the next 20 years?

The answer to Q1 is Yes and No.

A good number of critical issues have been identified. However, whether the Authorities can adequately deal with them is another matter.

We recommend that an overall governing strategy is developed. This must be a bottom-up process, with Parish and Town Councils collectively taking the lead. This would be in line with the NPPF policy of giving power to communities. It is apparent that the proposed top-down strategies have failed in the past and will continue to fail in the future.

The Joint Transport Study forecasts a rapid growth in population, which will exacerbate the challenges if action is not taken. However, neither it, nor this plan, offers any proposals to adequately control this growth.

Could the problem be that Authorities no longer control events; events control them? This is appreciated on page 48 item 10 of the Joint Spatial Plan, which clearly sets out the requirement for Local Plans to respond to changing needs and circumstances. This lack of control suggests that, rather than lasting to 2036, this Local Plan will only last a very short time.

By pursuing piecemeal strategies in the past, we are all now placed in a position that it will be extremely difficult to recover from.

Incredibly, despite the very high number of residential developments, we still have an affordable housing crisis. It seems that, in the "build as many houses as we can, irrespective" stakes, Local Authorities and developers have no incentive to honour original planning agreements. Building yet more market houses is not the answer. This is one good reason to place control in the hands of local communities.

There are other issues that cause concern. However, these can be dealt with during the next phases of the process.

### Q2: Are the suggested spatial priorities the right ones?

The answer to Q2 is again Yes and No.

It should be considered in conjunction with the West of England Joint Spatial Plan Publication Document November 2017, the West of England Joint Spatial Plan Joint Transport Study October 2017 and the Somer Valley Transport Strategy DRAFT Report October 2017.

The main priority of any plan of this type should be to improve and enhance quality of life for its people. However, failed policies of the past have meant that in the mad rush to build quantities of houses, with the apparent income that generates and the boxes it ticks, we continue to allow the building of inner city-like estates that are both bland and oppressive, with the resulting negative impact on the health and wellbeing of residents.

When residents complain that "this is not what we were promised" or ask, "whatever



happened to quality of life™, it can be appreciated that something is seriously wrong with the whole process.

Existing developments have not been accompanied by supporting infrastructure, services or facilities. Any sustainable balance has been lost.

Another dubious priority is dealing with the issue of commuting. Section 6.6 of the Joint Transport Study implies that there is no case for infrastructure investment in the Somer Valley. Emphasis should be placed on improving bus services, although the Joint Transport Study looks to mitigate the impact of car travel and doesn't appear to see buses, cycling or walking as viable for travel to work.

The Somer Valley Transport Strategy Report suggests that car travel will remain essential due to the wide dispersal of origins and destinations relevant to both in- and out-commuting. Figures 2.12 and 2.13 clearly indicate that, for the vast majority of commuters, public transport, together with cycling and walking, will never be an option. It was also suggested that a cycle route from MSN to Farrington was not feasible due to land issues and cost, so that would preclude a new road in the same vicinity to service business development.

Topographical issues would also seem to make increased cycling and walking unfeasible for anything other than leisure purposes.

The approach seems to be to mitigate the effect of car travel by developing new facilities, such as park and ride, close to the Bristol boundary.

It may be that developing modern car technology will resolve environmental issues.

The Somer Valley Enterprise Zone has been an aspiration for many years and is likely to remain so for many years to come. It appears to be promoted on the basis of providing employment opportunities in support of mass housebuilding in the Somer Valley. However, if it eventually comes on line, it is likely that all of the houses will have been completed and their occupants will have found employment elsewhere. Increases in home working will also have an impact.

Other available commercial sites in the area, also promoted on the same basis, have apparently had little or no interest, possibly for logistical reasons and lack of appropriate local skills, so it is difficult to see how the Somer Valley Enterprise Zone is any different.

Unless workers live very close to the SVEZ it will only support in-commuting with the certain irony that that brings. Again, topography will make car use essential for the vast majority.

The retail sector has been adversely affected by the rise of online shopping, which can threaten the viability of the high street as a retail facility. As internet speeds improve and more people have access to the internet this threat will only grow.

It is accepted that many older people are not able to use modern technology and still require services to be available in the usual way. However, as this demographic declines it will be replaced by a new older generation that will have grown up in a digital age.

It may be more prudent to see the long-term future of the high street and close surroundings as an entertainment and leisure area rather than a retail one. This may reduce the need to travel to Bristol or Bath.

Convenience stores need to be dispersed appropriately.

B&NES Council have apparently incurred not insignificant expenditure in dealing with care home issues. As the Council has a development company perhaps it should explore the possibility of Council-developed care facilities.

~Social inequalities™ is meaningless without definition.

The Joint Spatial Plan, on page 47, advocates collaboration, together with the exploration of new ways and methods of delivery. It certainly doesn't advocate more of the same.

## Spatial Strategy Options

**Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?**

Option 1 - Continue the existing hierarchical approach

**Q3 - Please give reasons for your answer**

The answer to Q2 is again Yes and No.

It should be considered in conjunction with the West of England Joint Spatial Plan Publication Document November 2017, the West of England Joint Spatial Plan Joint Transport Study October 2017 and the Somer Valley Transport Strategy DRAFT Report October 2017.

The main priority of any plan of this type should be to improve and enhance quality of life for its people. However, failed policies of the past have meant that in the mad rush to build quantities of houses, with the apparent income that generates and the boxes it ticks, we continue to allow the building of inner city-like estates that are both bland and oppressive, with the resulting negative impact on the health and wellbeing of residents.

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Convenience stores need to be dispersed appropriately.

B&NES Council have apparently incurred not insignificant expenditure in dealing with care home issues. As the Council has a development company perhaps it should explore the possibility of Council-developed care facilities.

“Social inequalities” is meaningless without definition.

The Joint Spatial Plan, on page 47, advocates collaboration, together with the exploration of new ways and methods of delivery. It certainly doesn’t advocate more of the same.

**Q4 - Are there any other approaches/scenarios you think should be considered for accommodating non-strategic growth in B&NES**

No

**Q4 - Please give reasons for your answer**

See answer to Q3.

**Q5a - Have we considered all the issues?**

**Q5a - Please give reasons for your answer**

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

**Housing Needs and Student Accommodation**

**Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...**

See answer to Q3.

**Q21b - Are there any other options?**

No. Student accommodation should be provided on campus. If the necessary space is not available, then the facility shouldn’t expand.

Pressure on HMOs resulting in the dispersal of families outside of Bath is unacceptable. Priority should be given to the development of training and apprenticeships in the wider world to maintain a balanced workforce.

## Respondent

<b>Company</b>	Savills (UK) Ltd
<b>Name</b>	Karine Johnson

## Spatial Strategy Options

**Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?**

Option 1 - Continue the existing hierarchical approach

**Q3 - Please give reasons for your answer**

Our client owns a number of sites outside the Green Belt and in sustainable locations, well-related to the built-up area of Radstock which, with Midsomer Norton and Westfield, makes up the second largest urban area in the district. These sites are identified in the latest Housing and Economic Land Availability Assessment (HELAA) report published in November 2017 as:

RAD21 Land south of Mill Road  
 RAD23 Land east of Maple Rise  
 RAD25 Land at Manor Farm, Church Hill  
 RAD26 Land north of Old Road  
 RAD32 Land north of Haydon Farm  
 RAD35 Land west of 66-124 Kilmersdon Road

We believe that these sites could accommodate some of the district's employment and housing requirements, in the context of the existing hierarchical approach (option 1), or alternatively, in the context of a focussed approach (option 2), in which Radstock would be selected as a key location for development.

## Respondent

<b>Company</b>	St Monica Trust
<b>Name</b>	Lisa Loveridge

## Spatial Strategy Options

**Q5a - Have we considered all the issues?**

No

**Q5a - Please give reasons for your answer**

There is no provision for worship within the proposed development. Please could you consider the spiritual needs of the new residents.

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

## Strategic Development Location: North Keynsham

**Q6a What are your views on the vision and objectives?**

It looks good. Am concerned about the flood risk.

**Q6b What type of place should be created here?**

To answer 11a and 11b it is very possible to make a carbon neutral development and this has

happened in other places. We need to do this as global warming is having more of an impact on everyone.

## Respondent

<b>Company</b>	StokesMorgan Planning Ltd
<b>Name</b>	Heather Faulkner

## Vision and Spatial Priorities

**Q1 - Have we identified the critical issues facing the District over the next 20 years?**

Yes

**Q2: Are the suggested spatial priorities the right ones?**

Yes

**Q2 - Please give reasons for your answer**

Strong emphasis needs to be on housing growth and transport improvements.

## Spatial Strategy Options

**Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?**

Option 3 - Dispersed approach

**Q3 - Please give reasons for your answer**

By extending settlement boundaries and reconsidering the Green Belt boundaries as well as allocating smaller sites this represents a better way for development to come forward. The proposed large scale settlements would have a much more significant overall impact on the Green Belt than a number of smaller ones close to existing settlements. The impact on the significance and openness of the Green Belt would be unlikely to be felt as strong at a local level with the dispersed approach.

There would be a less harmful visual impact on the area as smaller sites on edges of settlements would better integrate into existing built development rather than excessive elements of the countryside being built on.

The ecological impact of developing a number of dispersed sites would be smaller and easier to mitigate. Sites could be specifically chosen away from sensitive areas such as SSSI and SNCI. The impact on ecology at a local scale would be easier to manage and mitigate and would have less of an impact on transient species such as bats.

The transport infrastructure requirements for large scale site would be significant and expensive as well as timely to complete. The provision of dispersed sites would mean that the existing transport next work could be used and whilst there would be an increase in users as this would be dispersed it could easily be accommodated. The increase in populations in smaller settlements could also result in improvements to existing bus time tables for example. Modern ways of working also need to be considered and it is not uncommon, particularly for people living in more rural areas to regularly work from home. The option of car sharing in rural areas should/could be further explored so help facilitate reduced trips.

Small increases in existing settlements would also result in additional support for existing services in

rural areas which may currently be struggling. The provision of new settlements with new facilities would assist existing village shops etc.

**Q4 - Are there any other approaches/scenarios you think should be considered for accommodating non-strategic growth in B&NES**

Yes

**Q4 - Please give reasons for your answer**

The Council should consider specifically allocating a higher number small to medium of sites on the edge of existing settlements. This would result in removing sites from the Green Belt and changing settlement boundaries. The provision of multiple allocated sites across all/most settlements would significantly improve housing numbers. These site are likely to be able to come forward in a much shorter time frame than the larger strategic site proposed.

**Strategic Development Location: Whitchurch**

**Q14a - Is this the right approach?**

No

**Q14a - Please give reasons for your answer**

The approach suggested contains a number of flaws.

The 'indicative potential development area' appears to exclude an area of land to the south east of Whitchurch village. This land is not of any specific landscape value, or is of no greater value than

**Housing Needs and Student Accommodation**

**Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...**

There should be a greater emphasis on market led PBSA. The market rather is better placed that policy to adapt to the needs/demands of the students. Where appropriate sites should be allocated for student housing however there should not be restrictions placed on wind fall opportunities for student housing development. Whilst PBSAs may utilise land which could be used for housing the student accommodation will often provide a higher density of population and therefore make efficient use of land. The provision of PBSA will also help to relieve the pressure on traditional family housing in the area and result in the need for fewer student HMOs.

**Q21b - Are there any other options?**

see above.

**Respondent**

<b>Company</b>	Stride Treglown
<b>Name</b>	Rob Delius

**Vision and Spatial Priorities**

**Q1 - Have we identified the critical issues facing the District over the next 20 years?**

Yes

**Q2: Are the suggested spatial priorities the right ones?**

No

**Q2 - Please give reasons for your answer**

The main priorities are correct, however within the bullet points under point 5...

5) Plan for development that promotes health and well being

I would urge B&NES to include a reference to promoting the inclusion of water within new public realm design.

'Blue infrastructure' has been proven to have a hugely positive impact on our health and wellbeing in urban environments. And in Bath in particular we should be celebrating our spa and water heritage by requiring new developments of a certain size, where appropriate, to include fountains or water features as part of public realm proposals.

Please refer to the report within [www.waterofbath.org](http://www.waterofbath.org) for more information. This idea won the city-wide Imagine Bath competition in 2015 and has widespread support in the city.

This would equally apply to point 2

2) Protect and enhance the District's natural, built and cultural environment and provide green infrastructure

Which could be adapted to read:

2) Protect and enhance the District's natural, built and cultural environment and provide blue and green infrastructure

With an edit of the following bullet point as follows:

â€¢ Maintain and enhance functional and connected high quality green and blue infrastructure networks (helps tackle impacts of climate change, sustainable water management, deliver healthy lifestyles, improve local sense of place and attract investment)

And an additional bullet point:

- Promote Bath's spa heritage by encouraging new development to incorporate water features

**Respondent**

<b>Company</b>	Ubley Parish Council
<b>Name</b>	Dr Phil Collins

**Development Precedents**

**Q20a - What are the qualities of the places on pages 24 to 27 that could be used in either of the new development areas?**

We understand that as a result of the JSP then B&NES will have to find sites for over 14,000 additional houses. Whilst many of these are focused on identified strategic sites, it is recognised that 700 are non-strategic and likely to be sited in the rural

**Q20b - What aspects should we seek to avoid?**

Trying to force housing into areas without the requisite infrastructure or sustainability.

**Q20c - What other precedents would you use?**

As far as the Chew Valley is concerned to take into account the Neighbourhood Plan that was so carefully worked on.

## Respondent

<b>Company</b>	Unite Students
<b>Agent:</b>	RPS

## Housing Needs and Student Accommodation

### Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...

We write on behalf of our client, Unite Students, to submit representations to the consultation on the Local Plan 2016-2036 Issues and Options. Unite Students is the UK's leading manager and developer of student accommodation, providing homes for around 50,000 students in more than 140 purpose built properties across 28 of the UK's strongest university towns and cities. The consultation invites comments on options for responding to the universities' growth and student accommodation demand.

#### Summary of Representations and Recommendations

Our representation focuses on Section 6: Housing Needs and Student Accommodation and comment as follows:

â€¢ We support the Council's recognition of the demand for additional housing within Bath and North East Somerset and that future housing provided must address a range of specific needs.

â€¢ We support the Council's recognition of the significant implications of student accommodation pressure and the need to consider this alongside other development pressures to ensure the city is able to continue to fulfil its strategic economic role.

â€¢ We support the Council's acknowledgement of the estimated population trends and the significant changes to the population profile which will result in a more student led mix in Bath.

â€¢ We support the Council's recognition of the need to address the issue of affordability of student accommodation and to ensure the needs of 2nd and 3rd year students are met.

â€¢ We support the Council's intentions to plan for the provision of further Purpose Built Student Accommodation this can help to take some pressure off the private rented sector and the increasing numbers of HMOs.

â€¢ We agree with the Council's recognition of the link between the supply of additional academic space and the demand for student accommodation and believe the Council should consider the approach of allowing additional academic space only where additional student accommodation will also be provided.

To summarise, we support the Council's recognition to address the strong demand for student housing in Bath and North East Somerset through the provision of purpose built student accommodation. We also are in agreement that this provision would help to alleviate the pressure on other housing sectors such as private rented, and in particular HMOs thus ensuring sufficient provision of family sized homes.

#### Section 6: Housing Needs and Student Accommodation

Set out within this section are 5 Options designed to stimulate discussion regarding the appropriate



response the Council should have to the universities’ growth and student accommodation demand.

Option 5 proposes that the provision of further academic space must be supported by the provision of additional student accommodation which includes 2nd and 3rd year students. This approach enables strong protection of employment and housing land within Bath and North East Somerset. Additional academic space would require additional student accommodation to be provided on campus or elsewhere in the district.

We are of the strong opinion that Option 5 is indeed the most appropriate response to the strong demand for student housing within Bath and North East Somerset.

**Conclusion**

We are generally in support of the plan and in particular Section 6: Housing Needs and Student Accommodation and believe that taking forward Option 5 is the most appropriate response to the universities’ growth and student accommodation demand within Bath and North East Somerset. Please acknowledge receipt of our representations to the Draft Local Plan 2016-2036. We look forward to discussing matters with you further in the future.

**Respondent**

<b>Company</b>	Wessex Water
<b>Name</b>	Dave Ogborne

**Vision and Spatial Priorities**

<b>Q1 - Have we identified the critical issues facing the District over the next 20 years?</b>
<p>We consider that the following issues may also require detailed consideration in the Plan:</p> <ol style="list-style-type: none"> <li>1. Adaptation to heat stress (overheating) is likely to increase in the next twenty years.</li> <li>2. Adaptive management Strategies for the natural and built environment. As new climate change data (new climate projections due in 2018) and other local evidence becomes available. There is a need to recognize and manage through planning policy the risks to the natural environment from climate change impacts. Especially if green infrastructure (GI) occupies a greater role in mitigating risks such as through, Natural Flood Management and mitigating heat stress. A requirement for the effectiveness of GI mitigation under different climate scenarios and conditions should be adequately assessed and managed.</li> </ol>

<b>Q2: Are the suggested spatial priorities the right ones?</b>
<p>Wessex Water welcomes and supports Policy 5, Place Shaping Principles, outlined in the West of England Joint Spatial Plan (JSP). However, the desired outcome from the high-level policy statements JSP may not be sufficiently realized unless there is adequate demonstration that these are supported by linked detailed planning policies in Local Plans, and Supplementary Planning Documents (SPDs). Through consultation on individual Unitary Authority Local Plans, Wessex Water is keen to discuss examples of potential linked detailed policies that could support Policy 5 Place Shaping Principles. This could include:</p> <ul style="list-style-type: none"> <li>• The need to address increasing climate change impacts which will require investment in green infrastructure and sustainable urban drainage (or water sensitive urban design). Development Plans must be mindful of the competing uses that will need to be accommodated in the public realm</li> </ul>

of new and existing developments with increasing climate change impacts such as increased rainfall and intensity and heat stress (over heating). Space is required for roads, cycle paths, parking for bicycles and cars, street trees for shade and cooling and sustainable urban drainage etc. Transport networks and development typically increase the impermeable surfaces which can lead to flooding and drainage issues where not previously experienced. Therefore, any transport policy is intrinsically linked to the spatial policy and should recognize that the trade-offs will be made in the public realm between the need to accommodate more cars and the need to provide space for sustainable urban drainage and green infrastructure. It may be advantageous to take an approach similar to the healthy streets approach.

<https://healthystreetscom.files.wordpress.com/2017/01/healthy-streets-for-london.pdf>

â€¢ In terms of resilience to severe weather and longer-term climate change impacts, it would be advantageous if planning authorities understand where the thresholds for disruption are in the natural and built environment and develop integrated plans for addressing long-term risks that can be refined and monitored. Wessex Water is keen to work with B&NES, the Environment Agency, Natural England, other infrastructure providers and the Bristol Avon Catchment Partnership to help develop a common approach developing mitigation and adaptation policies.

â€¢ Measures to identify, protect, enhance and manage different soils types, recognizing that different soils support different flora and fauna and integrate new data on soils into local plans.

â€¢ Policies on water efficiency in new developments should be explored, particularly rainwater and grey water recycling, with ambitious aims to decrease consumption.

â€¢ There is also the need to recognize and manage through planning policy the risks to the natural environment from climate change impacts. Especially if green infrastructure (GI) occupies a greater role in mitigating risks such as through, Natural Flood Management and mitigating heat stress. A requirement for the effectiveness of GI mitigation under different climate scenarios and conditions should be adequately assessed and managed.

We would welcome the opportunity to work with key strategic partners to jointly develop potential detailed policies from a wide perspective. Cross sector, workshops with the key strategic planning organizations around the strategic development Locations could be effective to inform detailed policy and design to go into Local Plans.

## Spatial Strategy Options

**Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?**

Option 2 - Focussed approach

**Q3 - Please give reasons for your answer**

We consider that Option 2 (focused approach) may be the most appropriate when considering provision of infrastructure to serve the needs of new residents for water and sewerage services (with Option 1 as a second preference).

In support of this position, we would note that development on brownfield sites can have the benefit of existing or recent connections to sewerage and water supply services. We will seek opportunities to reduce surface water flow from brownfield sites by the use of Sustainable Drainage Systems (SuDS) and ask that the LPA supports securing green space within sites to accommodate SuDS whilst contributing to placemaking, wellbeing and water quality.

Existing sewers at the edge of towns can be of small diameter, increasing in size towards the receiving sewage treatment works (STW). Development of sites around the edge of existing settlements may require increasing capacity in our sewers which can be disruptive and costly depending upon the distance from the STW and nature of the existing network. Water supply costs

will depend upon proximity of the closest main with capacity to serve development.

Should Option 3 be taken forward, we would note that assessment will be required to consider connection to existing sewer networks in accordance with our comments above or the possibility of construction of a new STW. Land will be required for a new STW sufficiently distant from development so as not to cause or create issues for odour, flies and noise. A new STW will also need to be close to an appropriate watercourse for the discharge of treated effluent. Wessex Water estimate a new STW takes approximately 10-15 years to plan and construct.

**Q4 - Are there any other approaches/scenarios you think should be considered for accommodating non-strategic growth in B&NES**

Yes

**Q4 - Please give reasons for your answer**

Climate change scenarios using more detailed data (Climate projections due in 2018) when this becomes available.

**Q5a - Have we considered all the issues?**

No

**Q5a - Please give reasons for your answer**

We believe that insufficient consideration and assessment of development proposals in proximity to our Sewage Treatment Works (STW) at Keynsham has been carried out to inform the development proposals at North Keynsham. The issue has been raised in earlier consultations on the Joint Spatial Plan and is included in the JSP Infrastructure Position Statement.

We consider that residential and other regularly occupied/sensitive development should not be permitted in locations likely to be adversely affected by the operation of the STW and any associated infrastructure. We would welcome further engagement with the Council on odour issues and believe that there is a need for further detailed engagement. We would welcome the opportunity to agree arrangements to prepare and complete supporting impact assessments to demonstrate that the development proposals at North Keynsham are unaffected from odour emissions, noise or vibration with or without mitigation and that any mitigation requirements are conditioned on the development. The development proposals must not impact on Wessex Water's statutory duties under the Water Industry Act 1991. The access requirements for operational vehicles should also be considered, together with any relevant maintenance activities.

In particular, we would note that areas of medium to high density housing remain within relatively close proximity to the STW. The indicative plan also shows potential employment development potentially up to the boundary of the STW. Whilst this may be considered a lower risk receptor, there is still the potential to impact future users of such development. Should development not include adequate mitigation, this may give rise to future complaints or be considered to cause a statutory nuisance, which could result in the need for extensive on-site mitigation to the cost of our wider customers.

We would also note that development in close proximity to the STW could also experience issues with flies, particularly in the periods between February to late June and September to November in line with breeding cycles of the Chironomid fly species. The STW has had historical fly complaints from the existing industrial estate next to the site and we consider that there is a potential risk of future fly complaints if development occurs in close proximity to the site. It is important to note that no currently available best practice technique will remove the source of flies and fly larvae from an STW.

We consider that the approach outlined above is supported by national policy, specifically Paragraph 109 of the NPPF, which requires that the planning system should prevent new development from being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability.

Keynsham sewage treatment works is a valuable asset vital to the protection of the environment, public health and crucial to the future development needs of Keynsham. The proposed developments at Keynsham and Whitchurch are expected to be connected to the STW which will require the STW to be expanded beyond its present geographical limits to accommodate the increased flows to the STW and maintain existing statutory requirements. This will impact upon the current draft masterplan for the proposals at North Keynsham where development is proposed close to the works. Notwithstanding odour and noise issues discussions will be required with Wessex Water to ensure the development does not impact upon our duty to “effectively drain” homes and businesses within the Keynsham catchment.

#### Flooding & Drainage

Flood risk is a key issue for this Strategic Development Location and the risk is likely to increase with climate change. The Environment Agency and Lead Local Flood Authority are the statutory authorities to provide advice on flood risk. Wessex Water would value a more detailed discussion on the flood risk and drainage requirements and opportunities associated with both development locations (Keynsham and Whitchurch).

Consideration should also be made concerning the high groundwater levels in this location and potential issues with groundwater flooding and sewer inundation and associated impacts to the river Avon.

As this is a particularly vulnerable site, there is the opportunity to design to the highest standards incorporating the latest data on climate projections due in 2018. Surface water management should include data on urban creep, population projections, and demographics to better understand and manage surface water.

In addition, consideration of the impacts on the local Sites of Special Scientific Interest and Sites of Nature Conservation should ensure that development does not exacerbate risks to these sites.

Finally, consideration should be made of what spaces and green infrastructure (including the provision of new habitat) within the proposed development will be adopted and managed and by whom. Consideration should also be made of the annual financial provision to maintain and restore these spaces as well as additional expenditure that may be required to restore green infrastructure after flood events or droughts etc.

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

The odour modelling recently completed should be used to inform and more fully understand the impact zones from our STW. We consider that the masterplanning undertaken to date should not have occurred until such time as this modelling is completed to inform the land use options presented

### **Strategic Development Location: North Keynsham**

#### **Q6a What are your views on the vision and objectives?**

Wessex Water welcomes further discussion around some of the detailed issues and options which have not necessarily been included at this stage within this Local Plan consultation. These

specifically cover drainage and flooding, green infrastructure, opportunities for water efficiency and creating a healthy environment for all residents.

We would welcome discussion on the inclusion of further policies or more detailed policies based on:

- Local feedback from the risks outlined in the Government’s Climate Change Risk Assessment 2017
- Feedback to DEFRA through the Local Adaptation Advisory Panel on the next National Adaptation Program (2018)
- The Progress in Preparing for Climate Change 2017 Report to Parliament Committee on Climate Change
- Policies in the Draft London Plan 2017 and London Environment Strategy 2017

**Q6b What type of place should be created here?**

A high quality and sustainable place following the principles of the JSP Policy 5 “Place Shaping Principles

**Q7a - What do you think of the proposed road alignment?**

Wessex Water is interested to understand the transport requirements associated with this development in terms of the impacts from increased areas of impermeable surfaces and potential run off which may affect the sewerage system, wider drainage within the development and the environment. We do not have specific comments on the road or rail plans but would like to be assured that these have considered in the context of a changing climate, more intensive rainfall, and the implications for the surface water drainage network and potential flooding.

**Q8a - What do you think of the proposed approach to the street network and wider connections?**

Wessex Water is interested to understand the transport requirements associated with this development in terms of the impacts from increased areas of impermeable surfaces and potential run off which may affect the sewerage system, wider drainage within the development and the environment. We do not have specific comments on the road or rail plans but would like to be assured that these have considered in the context of a changing climate, more intensive rainfall, and the implications for the surface water drainage network and potential flooding.

**Q8b - Do you think it is important to create a healthy neighbourhood by encouraging walking and cycling?**

Yes

**Q8b - Please give reasons for your answer**

Concern about the environmental impacts of pharmaceuticals is growing and the use of medicines by people continues to increase. There are three potential sources of pharmaceuticals in the environment: Patient use, improper disposal and point sources from the production of medicines. The main route by which pharmaceuticals enter the aquatic environment is through the discharge of treated effluent from sewage treatment works (STWs). As conventional sewage treatment processes do not typically remove these compounds, a high proportion pass into the environment. The estimated cost of adding treatment processes to remove pharmaceuticals from STWs in the Wessex Water region is £2.2 billion, along with additional energy and chemical costs.

We are therefore supportive of measures to create a healthier region and would recommend that any new policy consider steps to reduce health inequalities by ensuring that the wider determinants of health are addressed in an integrated and co-ordinated way. This should take a systematic approach to improving the mental and physical health of all people through promotion of a more active and healthy lifestyle for all and enable people to make healthy choices. Development

proposals should assess the potential impacts and opportunities on the health and wellbeing of communities, in order to mitigate any potential negative impacts and help reduce health inequalities, for example through the use of Health Impact Assessments.

**Q9b - How can we improve the Green Infrastructure network through the site?**

Wessex Water is supportive of the use of green infrastructure to enhance new and existing developments. Multi-functional green infrastructure can provide multiple benefits including amenity, surface water attenuation and purification, improvements to air quality and localized shading to reduce heat stress, for example.

We have identified some examples of potential detailed policies we would like to discuss with BANES Local Plan to support Policy 5 the Place Shaping Principles in the West of England Joint Spatial Plan, these relate to the Public Realm, Green and Blue Infrastructure:

These are based on:

- Local feedback from the risks outlined in the government's Climate Change Risk Assessment 2017
- Feedback to DEFRA through the Local Adaptation Advisory Panel on the next National Adaptation Program (2018)
- The Progress in Preparing for Climate Change 2017 Report to Parliament Committee on Climate Change
- Policies in the Draft London Plan 2017 and London Environment Strategy 2017:

In particular, the Green Infrastructure Network could be improved by:

- Incorporating green infrastructure into the public realm to support rainwater management through water sensitive urban design/sustainable drainage, reduce exposure to air pollution, manage heat and increase biodiversity.
- Green and open spaces planned, designed and managed as green infrastructure provide a wide range of social, health and environmental benefits and are a vital component of any development's infrastructure. Individual spaces are important at the neighborhood level as they are the spaces which are used most often and may become increasingly important to reduce local heat stress. Connectivity across the network of green and open spaces is particularly important as this provides opportunities for walking and cycling and for improving wildlife corridors. [Source: Draft London Plan, 2017]
- Proposals to enhance green and open spaces to provide a wider range of benefits for all will be encouraged. Examples could include improved public access for all, inclusive design, recreation facilities, habitat creation, landscape design improvement or flood storage.
- Urban greening covers a wide range of options including, but not limited to, street trees, green roofs, green walls, and rain gardens. It can provide a range of benefits including amenity space, enhanced biodiversity, addressing the urban heat island effect, sustainable drainage and amenity planting.

We would welcome policy inclusion or support on the following issues:

Water infrastructure

- In order to minimize the use of mains water, water supplies and resources should be protected and conserved in a sustainable manner.
- Development proposals should:
- Provide ambitious water efficiency targets, maximizing rainwater and exploring Grey

recycling to meet this requirement.

â€¢ Be encouraged to incorporate measures such as smart metering, water saving and recycling measures, including retrofitting, to help to achieve lower water consumption rates.

#### Water Quality

In terms of water quality Development Plans should (in line with Policy 5 of the JSP):

â€¢ promote the protection and improvement of the water environment should take account of the Severn River Basin Management Plan and Bristol Avon Catchment Plans.

â€¢ support strategic wastewater treatment infrastructure investment to accommodate growth and climate change impacts. Local Authorities should work with Wessex Water in relation to local wastewater infrastructure requirements.

Development proposals should:

â€¢ seek to improve the water environment and ensure that adequate wastewater infrastructure capacity is provided and be designed to ensure that misconnections between foul and surface water networks are eliminated and not easily created through future building alterations.

â€¢ In relation to wastewater, Water Framework Directive requirements should be maintained through the Severn River Basin Management Plan and the Bristol Avon Catchment Plans.

â€¢ A cross sector Integrated Catchment based approach to Water Management should be considered for Strategic Development Locations, where particular flood risk and water-related constraints such as limited sewer capacity require an integrated approach to the provision of infrastructure and management of risk.

#### Flood risk management

â€¢ Current and expected flood risk from all sources across the Bristol Avon Catchment including the West of England should be managed in a sustainable and cost effective way in collaboration with the Environment Agency, the Lead Local Flood Authorities, developers and infrastructure providers.

â€¢ Development Plans should use Strategic Flood Risk Assessment as well as Surface Water Management Plans, where necessary, to identify areas where particular flood risk issues exist and develop actions and policy approaches aimed at reducing these risks. Local Authorities should co-operate and jointly address cross-boundary flood risk issues including with authorities outside the West of England.

â€¢ Development proposals which require specific flood risk assessments should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses.

â€¢ Development proposals for utility services should be designed to remain operational under flood conditions and buildings should be designed for quick recovery following a flood.

â€¢ In terms of mitigating residual risk, it is important that a strategy for safe evacuation and quick recovery to address such risks is in place; this is also the case for utility services.

#### Sustainable drainage

Lead Local Flood Authorities should identify â€œ through their Local Flood Risk Management Strategies and Surface Water Management Plans â€œ areas where there are particular surface water management issues and aim to reduce these risks.

Development proposals must demonstrate satisfactory disposal of surface water and that Sustainable Drainage Systems have been incorporated. Sustainable Drainage Systems should maximise opportunities for green infrastructure and aim to achieve greenfield run off rates with surface water run-off managed as close as possible to its source. Separate systems of drainage with points of connection or outfalls should be agreed with Wessex Water.

We recommend that all developments follow the SUDS Hierarchy to ensure that surface water drainage issues are adequately dealt with. For surface water, alternative means of disposal (e.g. SUDS, natural watercourse, highway drains) must be properly investigated before any connection to a public sewer will be considered. In cases where there is no other option, only rainwater from impermeable surfaces could be considered, and then only into a dedicated public surface water sewer. Details relating to flow rates and storage would also need to be submitted. Such connections must not be made to the foul systems.

Development proposals for impermeable paving should be refused where appropriate, including on small surfaces such as front gardens and driveways.

The benefit of attenuation above compared to below ground or in a basement is that pumping is normally not required to empty the attenuation tank. Local Flood Risk Management Strategies and Surface Water Management Plans should ensure they address flooding from sewers, drains and groundwater, and run-off from land and small watercourses that occurs as a result of heavy rainfall.

Waterways – strategic role

The Bristol Avon is a strategically important and iconic feature of the West of England. The Local Plan and green infrastructure proposals should have regard to the following in design of developments adjacent to the River: proximity to the river, clear visual links between areas, buildings and the river, specific geographical features such as main roads, railway lines and hedges, the whole curtilage of properties or sites adjacent to the River, areas and buildings whose functions relate or link to the River, areas and buildings that have an historic, archaeological or cultural association with the River, consistent boundaries with neighboring authorities.

Protecting the West of England’s Waterways

Development proposals that facilitate river restoration, including opportunities to open culverts, naturalise river channels, protect the foreshore and increase the heritage and habitats value, should be supported if appropriate. In contrast, we consider that development proposals to impound and constrain waterways would be inappropriate.

River restoration seeks to enhance their biodiversity, water quality and amenity value. The Bristol Avon Catchment Plan, identifies many opportunities for river restoration, as well as showing examples that have been implemented across the West of England.

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

Yes

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

Climate change risks will demand highly ambitious detailed policies. Examples of potential detailed policies we would welcome in the BANES Local Plan to support Policy 5 the Place Shaping Principles in the West of England Joint Spatial Plan could be based on:

- Local feedback from the risks outlined in the Government’s Climate Change Risk Assessment 2017

- Feedback to DEFRA through the Local Adaptation Advisory Panel on the next National Adaptation Program (2018)

- The Progress in Preparing for Climate Change 2017 Report to Parliament Committee on Climate Change

- Policies in the Draft London Plan 2017 and London Environment Strategy 2017



**Q12c - Do you agree with the requirement to link with the Bristol to Bath cycle path?**

Yes

**Q12c - Please give reasons for your answer**

To compliment and support policies on climate change mitigation and health.

**Strategic Development Location: Whitchurch**

**Q13a - What additional aspirations would you have here?**

Housing delivery will be dependant upon key infrastructure being delivered at the appropriate time and pace. Initial foul drainage appraisal indicates a long off site connecting foul sewer will be required to connect to the existing Keynsham sewerage system. Further significant downstream improvements will be necessary to protect existing properties from sewer flooding and reduce the risk of pollution.

The existing sewage treatment works at Broadmead Lane is a valuable asset vital to the protection of the environment, public health and crucial to the future development needs of Keynsham. The proposed developments at Keynsham and Whitchurch will generate the need to physically expand the sewage treatment works to maintain existing statutory requirements. This will impact upon the current draft masterplan for the proposals at North Keynsham where development is proposed close to the works. Notwithstanding odour and noise issues, discussions will be required with Wessex Water to ensure the development does not impact upon our duty to “effectively drain” homes and businesses within the Keynsham catchment. For the Whitchurch site we welcome close collaboration upon the phasing of the development to prioritise sewer network resources and investment.

Flood risk is a key issue for this Strategic Development Location and the risk is likely to increase with climate change. The Environment Agency and Lead Local Flood Risk Authority are the Authorities to provide advice on flood risk. We would note that the developable areas are likely to form the headwaters for two streams draining north east and south west. Development should therefore seek to ensure that surface water generated should be of sufficient quality to avoid deterioration of water quality and not increase flood risk downstream. The location of development is spread across (or may affect) two waterbodies classified under the Water Framework Directive:

• Chew - conf Winford Bk to conf R Avon (Brist). This is currently at moderate overall status (with phosphate as a potential issue).

• Brislington Brook. This is also currently at moderate overall status, with particular issues surrounding phosphate, invertebrates and macrophytes/phytobenthos.

• Bristol Avon (By Brook to Netham Weir). This waterbody (of which the stream flowing through Smallbrook is a part) is currently at moderate status.

**Q13b - How can this vision be delivered?**

The following are recommendations to consider:

• We recommend that all developments follow the SUDS Hierarchy to ensure that surface water drainage issues are adequately dealt with. The development proposals must demonstrate satisfactory disposal of surface water and that Sustainable Drainage Systems have been incorporated. Sustainable Drainage Systems should maximise opportunities for green infrastructure and aim to achieve greenfield run off rates with surface water run-off managed as close as possible to its source. Systems should be designed and implemented to deliver multiple environmental benefits, such as water use efficiency, water quality, biodiversity, amenity and recreational improvements. Separate systems of drainage with points of connection or outfalls should be agreed with Wessex Water.

For surface water, alternative means of disposal (e.g. SUDS, natural watercourse, highway drains) must be properly investigated before any connection to a public sewer will be considered. In cases where there is no other option, only rainwater from impermeable surfaces could be considered, and then only into a dedicated public surface water sewer. Details relating to flow rates and storage would also need to be submitted. Such connections must not be made to the foul systems.

There is the potential to provide more ambitious and comprehensive standards for SUDS than national standards. For example removing the automatic right to connect new development to the existing sewerage network. As recommended in the Progress in Preparing for Climate Change 2017 Report to Parliament Committee on Climate Change, there should be more comprehensive and ambitious national standards for SUDS. The automatic right to connect new development to the existing sewerage network to be made conditional on the national SUDS standards being met, and a clear policy on who should maintain and adopt SUDS by default.

As this is a particularly vulnerable site in terms of surface water flooding, there is the opportunity to design to the highest standards incorporating the latest data on climate projections due in 2018. Surface water management should include data on urban creep, population projections, and demographics to better understand and manage surface water.

**Q14a - Is this the right approach?**

**Q14a - Please give reasons for your answer**

We welcome detailed potential policies in the Local Plan as outlined in responses above and in particular 9 & 13.

**Q17a - How can we improve the quality of green spaces, and ensure that people have better access to recreational facilities...**

We welcome detailed potential policies in the Local Plan as outlined in responses above and in particular 9 & 13.

**Q18a - How can we enhance routes for walking and cycling, for example to Keynsham and towards Bristol?**

We welcome detailed potential policies in the Local Plan as outlined in responses above and in particular 9 & 13.

**Development Precedents**

**Q20a - What are the qualities of the places on pages 24 to 27 that could be used in either of the new development areas?**

We welcome detailed potential policies in the Local Plan as outlined in responses above and in particular 9 & 13. Wessex Water is in favour of the inclusion of green space and SUDS within the development to assist with surface water management, improve w

**Housing Needs and Student Accommodation**

**Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...**

Wessex Water will support a considered and planned approach to providing new student accommodation for those planning to study in Bath. We do not support Option 1 as the current approach of 'No specific Purpose Built Student Accommodation (PBSA) allocations' has meant that we have been unable to plan for strategic improvements to our networks to support city centre

growth. Student Accommodation has, in most instances, placed additional demands on our networks over and above previous use.

## General

### Any other comments?

We have undertaken a collaborative exercise across the company to review the draft document and policy objectives.

A range of responses has prepared on behalf of Wessex Water

## Respondent

<b>Company</b>	Whitchurch Primary School
<b>Name</b>	Mr C Hornsby

## Strategic Development Location: Whitchurch

### Q16a - How could the existing village centre be enhanced to cater for the needs of an increased population?

It had been brought to my attention that part of the plan includes the construction of new schools on several possible sites. My school is marked for expansion commencing August 2018. Will my school expansion possible new schools bring about too many sch

## Respondent

<b>Company</b>	Widcombe Association
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## General

### Any other comments?

The Widcombe Association wishes to add their strong support for the comments already submitted by FoBRA, whilst adding in particular their concerns to ensure that the implications on traffic and transport are fully taken into account in all planning policy development as well as in the consideration of individual planning applications and that the new Local Plan will include detailed policies to address existing traffic and transport deficiencies, in line with the Bath Transport Strategy. The WA is also concerned to see a clear policy developed on future expansion of the universities and provision of related student accommodation, to control the growing impact of new PBSAs and the depletion of sites suitable to meet other legitimate housing needs in the city.

## Respondent

<b>Company</b>	Woolley Project Management Limited
<b>Name</b>	Nick Woolley

## Vision and Spatial Priorities

### Q1 - Have we identified the critical issues facing the District over the next 20 years?

Yes

#### Q1 - Please give reasons for your answer

We generally agree with the suggested Critical Issues. However, there needs to be more emphasis on increasing the number of all housing types in this plan period. We strongly support the emphasis in prioritising greater walking and cycling from new developments as this will help reduce carbon emissions, have less impact on the climate as well as encouraging the local population to become healthier. We strongly endorse zero and low carbon development which can, in spite of strong protest of most developers, be achieved cost effectively.

### Q2: Are the suggested spatial priorities the right ones?

Yes

#### Q2 - Please give reasons for your answer

We believe that the spatial priorities are correct. However in order to achieve the best results the Council needs to be informed by proper, meaningful consultations with key stakeholders so that the real strengths and weaknesses of the place in question and its invested capital, including heritage, natural and built environment etc. are utilised to create high quality places for people.

## Spatial Strategy Options

### Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?

Option 1 - Continue the existing hierarchical approach

#### Q3 - Please give reasons for your answer

We consider the Somer Valley to be the most appropriate place for new and additional development. It has exiting infrastructure that can be enhanced by new development not only to provide wonderful places for people to live, but sustainably regenerate areas that will also benefit the existing community.

Bringing land out of the Green Belt for circa 700 dwellings is unsustainable and unsound. A Green Belt release should only be considered for exceptional circumstances. Further to this, Somer Valley's location stops the encroachment of Towns and Cities in the countryside and the Green Belt. It provides a sustainable location to develop and with the use of good sound master planning, will bring a higher quality of living for the surrounding area.

In agreeing with Question 1 regarding the Critical Issues, we believe that Options 2 and 3 go against the Councils suggested critical issues. These options ignore the current issues of climate change, environmental damage, health, local communities and the housing need. We also believe that these Options will contribute to wasteful spending on extra consultations and infrastructure. The Council is clearly against this already. Both younger and older home buyers frequently want to live in urban areas that are close to their employment, amenities, including schools and health centers. Option 1 can and will further accommodate this in the most sustainable and cost effective manner.

A suitable site to be included in the Local Plan that encompasses the above is located to the north of Midsomer Norton (field number OS 4625). This site owner has an informal agreement for access

over the field to the west (field number OS 2617) which will provide the necessary access to and increase the overall developable area of the site. The site is well located and gives a sustainable base for extending this neighborhood as both walk-able and good for promoting cycle access to some of the further community facilities. The plan showing this land will be sent separately with a covering email.

**Q4 - Are there any other approaches/scenarios you think should be considered for accommodating non-strategic growth in B&NES**

No

**Q4 - Please give reasons for your answer**

See answers above

**Respondent**

<b>Name</b>	John Aldridge
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**Strategic Development Location: North Keynsham**

**Q6a What are your views on the vision and objectives?**

Using the map on page 16:

1 should continue as a footpath along the north side of the River Avon and not a became a cycleway as well. The nearby cycle track is often difficult for walkers with cyclists ignoring them at fast speed.

There are other potential ways of joining the new development with the cycle track.

8 could be a marina with houseboats rather than pleasure craft. A significant increase in boats on the River Avon could damage the ecosystem, particularly the underwater stages of dragonflies that this area is well known for (contact BRERC for species and counts).

14 I think this proposed recreational area floods from time to time so exactly what is proposed is important.

16 Habitat management and creation sounds great in principle. I suggest that the Avon Wildlife Trust is involved in discussions at an early stage. N.b. AWT was originally involved in a proposed wildlife area at Somerdale but pulled out for reasons that are not clear to me, so such a situation needs to be avoided this time.

17 If a Bristol to Bath metrobus is built into the plan, I hope it can be of use to residents of Keynsham rather than whizzing past the town on the bypass.

**Respondent**

<b>Name</b>	Anonymous
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**Housing Needs and Student Accommodation**

**Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...**

Option 3

## General

### Any other comments?

The Bath University has been converting existing on-campus student accommodation to office space without permission -this is completely unacceptable. Surely they should be building additional student accommodation. The strain on certain areas of Bath i.e. Oldfield Park and Lower Bristol Road is also unacceptable. Rubbish, parking issues and unsociable behaviour is a major problem for the residents of those areas. Students do not pay council tax, nor do the owners of the properties which they live in, for obvious reasons this is also unacceptable. Somebody has to take responsibility for contributing to the services.

## Respondent

<b>Name</b>	Scott Avent
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### Strategic Development Location: Whitchurch

#### Q14b - Could some development take place in other areas outside of this broad development location?

Absolutely not. The likes of Queen Charlton have historical importance and are protected areas of outstanding natural beauty. A huge number of houses are being built locally (Horseworld site and developments into Keynsham etc etc) where no thought has b

#### Q14d - What evidence is available to support development in these areas?

There is no evidence. Where is the demand locally....? There are no jobs locally either to support new homes .....putting further strain on commuting.

## Respondent

<b>Name</b>	Dennis Baber
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### Strategic Development Location: Whitchurch

#### Q13a - What additional aspirations would you have here?

Other than infra structure improvements to help the exiting traffic congestion problems, any additional housing proposals over the 250 already taken by the village should be minimal and not the ridiculous 2500 proposed as this would destroy the village community and Whitchurch will just become a built up suburb of Bristol.

#### Q13b - How can this vision be delivered?

The 2500 proposed houses is unrealistic and totally unfair on the existing community

#### Q14a - Is this the right approach?

No

#### Q14a - Please give reasons for your answer

as above

#### Q14b - Could some development take place in other areas outside of this broad development location?

Areas near Hicksgate roundabout on the Bath Road or vacant areas in Bristol itself would have less effect on local communities.

<b>Q14c - What would be the benefits of this?</b>
minimal effect on existing local communities and infra structure
<b>Q14d - What evidence is available to support development in these areas?</b>
Common sense

<b>Q15 - What should happen with the existing separation between Whitchurch village and Bristol urban area? Should we:</b>
Continue to protect the Green Belt gap & keep the village separate?
<b>Q15 - Please give reasons for your answer</b>
What is the point of a green belt if it can be removed and built on at a the short term whim of Developers and local authorities with no thought to the future environmental benefits to the present and future residents

<b>Q16a - How could the existing village centre be enhanced to cater for the needs of an increased population?</b>
by not increasing the population by building more housing.
<b>Q16b - How do we best integrate new local centre and facilities with the existing communities?</b>
as above

<b>Q17a - How can we improve the quality of green spaces, and ensure that people have better access to recreational facilities...</b>
as above
<b>Q17b -How could we make more of Stockwood Vale or Maes Knoll as important environmental assets to the local area? Could...</b>
as above

<b>Q18a - How can we enhance routes for walking and cycling, for example to Keynsham and towards Bristol?</b>
re-open the old railway route from Whitchurch to Temple Meads and provide a tram service
<b>Q18b - How can we encourage greater use of public transport?</b>
Better and cheaper service

## Respondent

<b>Name</b>	Paula Blake
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## Vision and Spatial Priorities

<b>Q1 - Have we identified the critical issues facing the District over the next 20 years?</b>
Yes

<b>Q2: Are the suggested spatial priorities the right ones?</b>
Yes

## Spatial Strategy Options

**Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?**

Option 1 - Continue the existing hierarchical approach

**Q3 - Please give reasons for your answer**

Paragraph 3.16 sums it up for me. Most sustainable locations, outside the Green Belt where access to employment opportunities, facilities and services, as well as to public transport is best.

**Q4 - Are there any other approaches/scenarios you think should be considered for accommodating non-strategic growth in B&NES**

Yes

**Q4 - Please give reasons for your answer**

Combination of option 1 and 2 - although not entirely sure of the difference. Assume option 2 will be focussed more on particular parts of towns/villages already included in option 1.

**Q5a - Have we considered all the issues?**

Yes

## Strategic Development Location: North Keynsham

**Q6a What are your views on the vision and objectives?**

Agree with the vision and objectives.

**Q8b - Do you think it is important to create a healthy neighbourhood by encouraging walking and cycling?**

Yes

**Q8b - Please give reasons for your answer**

Always

**Q10a - What should the housing mix comprise of?**

Should be mixed housing. Affordable housing, elderly, families.

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

Do not feel appropriate for student accommodation. Would want to build a community spirit - transient students staying for a couple of terms do not tend to create community. From the point of view of students, can not see them wanting to commute from Key

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

Yes

**Q11a - Please give reasons for your answer**

Anything to help the environment

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

Ambitious. Better to spend more now on good development, than paying more in maintenance/upkeep in future.

**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?**

Yes

**Q12c - Please give reasons for your answer**

Encourage cycling and walking at every opportunity. Lovely place to exercise.

**Housing Needs and Student Accommodation**

**Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...**

Option 3 would be my preferred approach, but option 2 would be a compromise. (Assume Option 5 forms part of each of the options 2,3 and 4). I think that the growth of the Universities is having a damaging effect on Bath and turning it into a very student-centric city. We need to rebalance our city's population. If the Uni's don't have space to grow on their own campus's - then they can't grow. Bath as a city needs to focus on developing its professional service industry, and attracting more professionals to bring their skills and experience to develop our economy. Students don't stay in Bath after qualification - they move somewhere else (where they can get a job) and take their skills with them. Jobs are becoming more scarce for locals (professional or not) in Bath, and the student jobs (part-time retail/hospitality) have seemingly taken over.

**Q21b - Are there any other options?**

The missing option is to refuse all further PBSAs. Uni's could concentrate on quality not quantity.

The suggested options include the do-nothing option, there are compromise options allowing the uni's to grow, but the extreme measure of restricting the uni's growth entirely is missing. Whilst this would be controversial, and not something I would necessarily support - it should be there as an option.

**Respondent**

<b>Name</b>	Nicolette Boater
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**Vision and Spatial Priorities**

**Q1 - Have we identified the critical issues facing the District over the next 20 years?**

Yes

**Q1 - Please give reasons for your answer**

Based on my knowledge and experience of economic development at a regional and local level, familiarity with B&NES Council's spatial planning process and documents over the last 5 or so years, and review of the evidence supporting both the West of England JSP and this Local Plan, I think the 7 identified critical issues capture the range and extent of the challenge at broad headline level. However the components supporting each critical issue are not always as comprehensively or well-defined. For example, Climate Change issue could usefully include a bullet point more focussed on climate change mitigation and in particular on the need to accelerate CO2 emissions reductions in order to meet the 2008 Climate Change Act and WECA's targets fro 2050 given the additional emissions from planned growth and development. (See fuller description of the rationale for this as relates to transport CO2 emissions in the October 2017 Joint Transport Study.)

**Q2: Are the suggested spatial priorities the right ones?**

Yes

**Q2 - Please give reasons for your answer**

Broadly and collectively these address the critical challenges the locality faces.  
 I'm particularly pleased to see inclusion of a broad priority relating to green infrastructure, and hope this will lead to the collection, monitoring and active management of our natural capital, and the primacy of the cross-cutting climate change priority.  
 Whilst overall I support priority 3, I rank some aspects less highly e.g. I would rather have a "vibrant" & diverse retail sector, than "a strong" & diverse retail sector, for, in my view, too much "retail" can adversely effect natural, built and cultural environment. But no doubt such issues of balance will be addressed in later stages of the Plans development

**Spatial Strategy Options**

**Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?**

Option 2 - Focussed approach

**Q3 - Please give reasons for your answer**

This approach will enable "smarter" investment addressing the critical issues and spacial priorities, and on a sufficient scale to generate transformational change e,g, by designing developments to a zero or negative CO2 emissions using the latest technologies & triggering lifestyle and behaviour changes.

**Q4 - Please give reasons for your answer**

None come to mind at this stage

**Development Precedents**

**Q20a - What are the qualities of the places on pages 24 to 27 that could be used in either of the new development areas?**

1. Opportunity for shared and community gardens, allotments, play and open space - this is as important if not more important than shops and communal buildings in developing a strong neighbourhood and sense of community
2. Attractive, varied, high spec

**Housing Needs and Student Accommodation**

**Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...**

My preliminary preference is for option 5, albeit this view is not yet well informed and may change. Certainly an issue which needs to be considered carefully and strategically.

**Q21b - Are there any other options?**

A combination of options 2 and 3 where for new PBSA built on campus is matched with new sites being made proportionately available off-campus

## Respondent

<b>Name</b>	alan boyle
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## Vision and Spatial Priorities

**Q1 - Have we identified the critical issues facing the District over the next 20 years?**

Yes

**Q2: Are the suggested spatial priorities the right ones?**

Yes

**Q2 - Please give reasons for your answer**

However, I would modify priority 1 bullet 1 by adding "concentrating new builds within city limits on brownfield sites.

## Spatial Strategy Options

**Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?**

Option 2 - Focussed approach

**Q3 - Please give reasons for your answer**

Option 1 has shown not to work and option 3 would result in intensive pressure on local facilities and transport networks. Option 2 is the least worst option and should focus on edge of towns and not villages. Just because a village has a shop and maybe a transport network running along its edge, it should not be considered a viable site. Edge of towns and cities have the facilities and also the transport networks.

**Q4 - Are there any other approaches/scenarios you think should be considered for accommodating non-strategic growth in B&NES**

Yes

**Q4 - Please give reasons for your answer**

Not sure if classed as non-strategic, but all brownfield sites in towns and cities should be used first before any other sites are considered.

**Q5a - Have we considered all the issues?**

No

**Q5a - Please give reasons for your answer**

Missed out how the new site will add a huge amount of congestion to the A4 awards Bath. This road as already congested and the additional load will cause huge delays. People will then find rat runs though salford and the surrounding villages.

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

Any recent transport surveys from surrounding areas

## Strategic Development Location: North Keynsham

**Q6a What are your views on the vision and objectives?**

A vision is a vision with no commitment so would need to expand more. Have you thought about more use of the River Avon? Access to bath etc.

**Q8b - Do you think it is important to create a healthy neighbourhood by encouraging walking and cycling?**

Yes
<b>Q8b - Please give reasons for your answer</b>
`anyway top remove the needs for cars in a safe and secure way is a good idea.

<b>Q9a - What do you think of the proposed response to landscape impact, especially considering views from the Cotswolds?</b>
Not enough information in consultation to comment
<b>Q9b - How can we improve the Green Infrastructure network through the site?</b>
Not enough information in consultation to comment

<b>Q10a - What should the housing mix comprise of?</b>
Mainly a mix of small 1 and 2 bed houses with a very small number of 3 bed. No need for anything bigger as need to stimulate the market bit 1st time buyers and those looking to downsize and as such free up larger houses elsewhere. There should be more so
<b>Q10b - Is there any scope for other forms of housing, for example student accommodation?</b>
Not in this development

<b>Q11a - Do you agree with the principle of aiming for a Zero Carbon development?</b>
Yes
<b>Q11a - Please give reasons for your answer</b>
All new houses should include solar panels on the roof..
<b>Q11b - How ambitious should we be? How do you think this aim could be achieved?</b>
It should be a requirement for zero carbon footprint and not a target

<b>Q12a - How can Avon Valley Wildlife &amp; Adventure Park be best integrated into the new development?</b>
Ensure direct access to from the new multi model link road and ensure new additional commercial premises nearby.
<b>Q12b - What opportunities are there to minimise visual impact from the Cotswolds?</b>
Ensure houses are designed either in keeping with the local buildings or houses are architecturally interesting. No small boxes etc.
<b>Q12c - Do you agree with the requirement to link with the Bristol to Bath cycle path?</b>
Yes
<b>Q12c - Please give reasons for your answer</b>
All new developments should be linked to cycle paths

### Strategic Development Location: Whitchurch

<b>Q14a - Is this the right approach?</b>
Yes
<b>Q14b - Could some development take place in other areas outside of this broad development location?</b>
Better to stay within this area and/or develop towards Stockard
<b>Q14c - What would be the benefits of this?</b>
Leave some green space and link up urban areas as this will happen overtime anyway

<b>Q15 - What should happen with the existing separation between Whitchurch village and Bristol urban area? Should we:</b>
Close the gap with development, and potentially have less development elsewhere?

**Q15 - Please give reasons for your answer**

If doing this then the gap will eventually fill with min-matched infill. Peter to manage that change in one go now as will be better in long run.

**Q18b - How can we encourage greater use of public transport?**

You will need much better bus lanes/routes. The A37 is already very congested and unless you have fully dedicated bus lanes then the road will just get congested and the benefit of public transport will be nil.

**Q18c - How can we encourage people to be more active, more often?**

**Development Precedents**

**Q20a - What are the qualities of the places on pages 24 to 27 that could be used in either of the new development areas?**

Small contained community spaces have the benefit of being considered owned and likely to be used and managed by the local population. People like own spaces so should look at retain some enclosed spaces per properties. Should look at sky-home.co who are

**Q20b - What aspects should we seek to avoid?**

Boring uninteresting open spaces there just because it is thought they should be. Test should be if a designer would be happy for their kids to play there. If not then think of a different approach.

**Q20c - What other precedents would you use?**

Plenty of trees, mix social housing with owned homes, different to surrounding area to give sense of community within each development.

**Housing Needs and Student Accommodation**

**Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...**

Option 3

**Respondent**

<b>Name</b>	Steve Bradshaw
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**Strategic Development Location: Whitchurch**

**Q14b - Could some development take place in other areas outside of this broad development location?**

Definitely not Queen Charlton.

**Q15 - What should happen with the existing separation between Whitchurch village and Bristol urban area? Should we:**

Continue to protect the Green Belt gap & keep the village separate?

## Respondent

<b>Name</b>	John Branston
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## Housing Needs and Student Accommodation

**Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...**

Option 3

**Q21b - Are there any other options?**

Yes. If the BCA site becomes vacant and has a covenant for educational use, this could become a dedicated student accommodation village, with bus routes to both Universities on higher category roads that do not bring additional student road traffic into conflict with city centre traffic. Given the money that private developers are making through PBSA and given the state of local authority funding, surely B&NES should be in on the act?

## General

**Any other comments?**

The growth of the universities has been played out for far too long at too great a cost to the city in terms of lost employment space (Pickfords, Green Park Rd, James St West, Pines gate, Twerton Mill, Halfords UBR etc.) and land which could/should have provided for key workers, first-time buyers and other aspects of Bath's own population's housing needs. It is absolutely time for B&NES to tie further HE growth 100% to on-campus developments. I note the council has recently been presented with a retrospective application for the Uni of Bath having surreptitiously turned student accommodation into offices. The University of Bath must be laughing up its sleeve at the host city which has allowed itself to be plundered in recent years in order to feed the business aims of an entity that pays a peppercorn rent but can afford to pay its VC £450k pa. This is an opportunity to start addressing the B&NES corporate strategy of 'putting residents first in everything we do'. Call a halt to the plunder.

## Respondent

<b>Name</b>	K Brown
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**Q2: Are the suggested spatial priorities the right ones?**

No

**Q2 - Please give reasons for your answer**

Spatial Priority 2 - in keeping with the provision of the draft Joint Spatial Strategy, development should not only take place within the environmental capacity of the district but should promote places of appropriate density and scale (Strategic priority 3&4 p12). Amend first bullet point accordingly..

Spatial Strategy 4 - new housing development should not only be sustainable but also create, and where appropriate retain, character, distinctiveness and sense of place. This is in line with the draft JSP Policy 5. Amend second bullet point accordingly or add a new bullet point to this section.

## Spatial Strategy Options

**Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?**

Option 2 - Focussed approach

**Q3 - Please give reasons for your answer**

The current hierarchical and suggested dispersed approaches risk degrading local distinctiveness and sense of place especially in the rural areas. The Audit of Facilities & Services in Rural Areas and the Draft Infrastructure Delivery Programme has demonstrated the limited capacity of many villages to accommodate additional settlements. The current Core Strategy allocations to RA1& RA2 is already highlighting these pressures and any additional housing requirements will exacerbate these pressures. Other issue remain to be assessed: the Joint Transport Study has failed to examine the pressure on B roads in rural areas from commuter traffic into the major urban centres and has made no assessment of on-street parking issues which are often acute in villages, especially on the Mendips and to the east of Bath ( see PPG Transport Evidence Base in Plan-making and decision taking, paras 54-005/006-2041010).

A focussed approach should be based upon a maximisation of development opportunities within Strategic Development Locations as a primary means of addressing housing need rather than as a secondary provision, as is implied by the JSP (policy 2.4). In this restart the proposal for expansion at Whitchurch and N Keynsham are endorsed. Every effort should be made to increase the amount of brownfield development and reuse in the urban centres above the present proposed allocation of 300 houses in order to avoid any additional requirement for housing in being sought broadly from villages.

Map 7 should be amended to show the extent of the Mendip Area ANOB. Para115 of the National Planning Policy Framework makes it plain that 'great weight should be given to conserving landscape and scenic beauty in these areas, 'which have the highest status of protection'. It is critical that settlements in this area are offered the same degree, if not greater protection, as those in the Green Belt, when considering expansion in one or more larger villages under the Focussed ( and existing hierarchical) proposal.

## General

**Any other comments?**

I'm the next stage of Local Plan preparation greater effort should be made to cross-reference the many intersecting issues in order to get a better picture of capacity for new development. This is not simply a matter of land availability but of assessing the impact of environmental value, infrastructure and transport needs. Presently some of this information is available in Background Papers but it needs to be fully integrated into site assessment in order to ensure viability.

In respect of Windfall sites a lower threshold than that proposed in the JSP (9 or fewer) ought to be adopted in the Local Plan when assessing proposals for RA1 & RA2 sites (as identified in the Core Strategy).

## Respondent

<b>Name</b>	Roger Busby
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## Spatial Strategy Options

<b>Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?</b>
Option 2 - Focussed approach
<b>Q3 - Please give reasons for your answer</b>
A focused approach is a more efficient way of ensuring adequate provision of facilities such as shops, schools and transport links.

<b>Q4 - Are there any other approaches/scenarios you think should be considered for accommodating non-strategic growth in B&amp;NES</b>
No
<b>Q4 - Please give reasons for your answer</b>

<b>Q5a - Have we considered all the issues?</b>
No
<b>Q5a - Please give reasons for your answer</b>
Whilst this provides for both more housing and a link road avoiding the centre of Keynsham I am not convinced it addresses the problem of traffic congestion and consequential pollution.
<b>Q5b - What other evidence do you think we need to consider?</b>
Access to Keynsham town centre - by car, on foot or by cycling, otherwise this is going to create a separate entity.

## Strategic Development Location: North Keynsham

<b>Q6a What are your views on the vision and objectives?</b>
What does "reinforce the distinctive character of Keynsham" mean?
<b>Q6b What type of place should be created here?</b>
Unless a significant effort is made to facilitate access to Keynsham town centre this new suburb will need to be self-contained.

<b>Q7a - What do you think of the proposed road alignment?</b>
Concerned that because its eastern end finishes on the edge of Saltford, thus facilitating housing development at the eastern end, it will results in Keynsham and Saltford becoming joined by an urban sprawl.
<b>Q7b - Do you have any views on the existing crossing points? Have you got any thoughts on the overall movement strategy?</b>
There is a major problem with the restricted highway under the rail bridge beside Waitrose.

<b>Q8a - What do you think of the proposed approach to the street network and wider connections?</b>
The problem is the 'wider connections'. The link road will not be an efficient by-pass if it is flanked by houses resulting in a 20mph speed limit and restricted by pedestrian crossings.
<b>Q8b - Do you think it is important to create a healthy neighbourhood by encouraging walking and cycling?</b>
Yes



**Q8b - Please give reasons for your answer**

Yes, but this is wishful thinking unless there are safe designated pedestrian footpaths and cycle tracks to the centre of Keynsham.

**Q9a - What do you think of the proposed response to landscape impact, especially considering views from the Cotswolds?**

"Chastity belts" of trees 30m wide can be eyesores themselves. The tree planting needs to be properly and strategically designed to blend into the landscape.

**Q9b - How can we improve the Green Infrastructure network through the site?**

This thinking was incorporated in the Somerdale consultation but when it came to the actual development much of what had apparently been agreed by the developer was no longer viable. Let's hope that the Authority takes a firmer line in the case of North Keynsham.

**Q10a - What should the housing mix comprise of?**

The illustrative photos accompanying this document are encouraging. Let's avoid the boring little boxes so often built by the big developers. Preference for pitched roof design - flat roofs are fine in the Middle East but it rains here. Concentrate on one

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

Let's keep student accommodation close to the centres of study. There should be potential for self-build.

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

Yes

**Q11a - Please give reasons for your answer**

In the light of climate change all future developments should aim to be 'Zero Carbon'.

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

As ambitious as possible.

**Q12a - How can Avon Valley Wildlife & Adventure Park be best integrated into the new development?**

Good public access.

**Q12b - What opportunities are there to minimise visual impact from the Cotswolds?**

Tree planting as part of a professional landscape design.

**Q12c - Do you agree with the requirement to link with the Bristol to Bath cycle path?**

Yes

**Q12c - Please give reasons for your answer**

Provides additional public access.

**Respondent**

<b>Name</b>	Steve Callow
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**Housing Needs and Student Accommodation**

**Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...**

Option 3 . Develop onsite accommodation

**Q21b - Are there any other options?**

No

**Respondent**

<b>Name</b>	Carlo Chinca
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**Housing Needs and Student Accommodation**

**Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...**

3

**General**

**Any other comments?**

Oldfield Park has reached saturation point with student accomodation. Local people need homes!

**Respondent**

<b>Name</b>	Peter Clinick
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**Housing Needs and Student Accommodation**

**Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...**

Option 3 or Option 5

**Q21b - Are there any other options?**

Very limited & stringently policed building in the immediate green belt area (Claverton plateau) of the University if not visible from most of the city.

**General**

**Any other comments?**

Whatever the outcome of this consultation there should be continuing on going consultation at every stage of any application especially PBSAs, the developers should pay an annual fee reflecting the loss of community tax that would be levied on actual residents if they were housed on the PBSA site..Any developer wanting to build on any site in Bath should be held to any agreement to build affordable housing (low rental for essential service employees NHS etc) & told there's no back out clause/fee, just a cancellation of building consent.

## Respondent

<b>Name</b>	Brian Curtis
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## Spatial Strategy Options

<b>Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?</b>
Option 2 - Focussed approach
<b>Q3 - Please give reasons for your answer</b>
Benefits are that investment in schools etc. is focussed to a few key areas.

## Respondent

<b>Name</b>	David Curtis
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## Strategic Development Location: Whitchurch

<b>Q13a - What additional aspirations would you have here?</b>
We have lived in Stockwood for 22 years. Our house borders onto the green belt around Stockwood. I note from your plans that we may end up having a major road being built at the end of garden. This is going to have a number of significant effects on our health. Pollution, from emissions and noise. I am asthmatic, how do you propose to deal with the potential lung problems I will suffer from, from breathing vehicle fumes. Noise, it is likely that this road will be busy night and day. I am a shift worker and crown servant, this is likely to effect our ability to sleep and enjoy the countryside. Can you clarify why we need this road?? I believe it is to benefit the airport and not the local economy. I would prefer to see an improved development of Stockwood's existing infrastructure which is tired. What about the green belt and the wildlife that live in the locality?? Building a road will massively impact wildlife. What about our house values?? they are likely to drop as a consequence of having a major road in close proximity. Why is Queen Charlton being protected?? why cant the residents of Stockwood be protected.

<b>Q14a - Is this the right approach?</b>
No
<b>Q14a - Please give reasons for your answer</b>
We have not received anything from BANES with respect to this simply because we fall in Bristol. However if any planner looked at a map, they would clearly see the proximity of Stockwood to the new road. Clearly it seems that BANES are keen to push this t
<b>Q14b - Could some development take place in other areas outside of this broad development location?</b>
Do any of these areas need development???
<b>Q14c - What would be the benefits of this?</b>
None, more pollution, more eating up of the green belt,.. Then only beneficiaries will be those heading for Lulsgate
<b>Q14d - What evidence is available to support development in these areas?</b>

<b>Q15 - What should happen with the existing separation between Whitchurch village and Bristol urban area? Should we:</b>
Continue to protect the Green Belt gap & keep the village separate?

**Q15 - Please give reasons for your answer**

The green belt is slowly being eroded, why not protect it

**Q16a - How could the existing village centre be enhanced to cater for the needs of an increased population?**

Redevelop Stockwood's shops and facilities that are tired and tatty

**Respondent**

<b>Name</b>	Chris Dagnan
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**Vision and Spatial Priorities**

**Q1 - Have we identified the critical issues facing the District over the next 20 years?**

No

**Q1 - Please give reasons for your answer**

More focus on the fact we have illegal dangerously unhealthy high levels of air pollution needed. And it's reduction through radical changes to traffic/parking/charges/etc.

**Housing Needs and Student Accommodation**

**Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...**

Option 3. Build PBSA on Campus only.

Maybe option 5 as well. Any expansion must be supported by accommodation on campus.

**Q21b - Are there any other options?**

No.

**General**

**Any other comments?**

And the limited campus capacity are not really negatives. There are existing buildings that can be knocked down and built with more accommodation. It not for th city to help them grow so much they harm the city. If space is a constraint then tough. They cannot keep on growing.

**Respondent**

<b>Name</b>	Mrs J Denis-Meira
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<b>Agent:</b>	Clare Hillier-Brown
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**Spatial Strategy Options**

**Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?**

Option 3 - Dispersed approach

**Q3 - Please give reasons for your answer**

To continue with the existing hierarchical approach, will be to the detriment of Midsomer Norton, Radstock and Westfield whose services and facilities are at or close to capacity. Furthermore, continuing with the hierarchical approach, would result / necessitate the release of Green Belt land at Keynsham, a town that has also expanded significantly in recent years. We are not opposed to limited infilling in these areas.

A focussed approach also has its disadvantages, especially if the investment to facilitate infrastructure, such as schools, transport etc does not come to fruition, resulting in further congestion, lack of school places, insufficient health care, employment and amenity space.

The dispersed approach is advantageous for the following reasons:

1. Releasing small areas of land (including land washed over by the Green Belt) adjacent to a development boundary, will have far less impact on the character and openness of the Green Belt, than the release of large swaths of Green Belt to accommodate circa 700 new dwellings, either in one location or across three / four existing towns.
2. Villages require the same injection as the towns, to ensure there is sufficient housing for new households, those wishing to increase their family size and those at an age where they wish to downsize and remain within the village.
3. A small increase in the housing stock (of differing size and tenure) solely for the purchase / rental of existing village residents would sustain existing facilities / services and may assist new enterprises flourish.
4. Finally, this approach would fully accord with paragraph 50 of the National Planning Policy Framework (NPPF), in that local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older peopleâ€¦). This should be applied district wide and not just focussed on the towns and larger villages.

**Q4 - Are there any other approaches/scenarios you think should be considered for accommodating non-strategic growth in B&NES**

No

**Respondent**

<b>Name</b>	Chris and Claire Diacopoulos and Craig
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**Vision and Spatial Priorities**

**Q2: Are the suggested spatial priorities the right ones?**

No

**Q2 - Please give reasons for your answer**

No the priority given to housing at Whitchurch is not the right priority. It appears that Whitchurch being used as a major venue for development because it is core neither to Bath nor to Bristol. For example there are brownfield sites in Bristol which should be used first, and would have much lower impact on biodiversity and environmental sustainability, and better employment possibilities. The

greenfield around Whitchurch, St Nicholas, Wansdyke, and the extended Maes Knoll and West Dundry area is worthy of greater protection than many other greenfield areas, and the transport consequences on the A37/Bristol Road and surrounding small roads will be wholly inhospitable. The Bristol Road is narrow, with narrow pavements at the heart of the village. A link road and park and ride will not mitigate the increased traffic flow of the large development being proposed. The plan needs massive rethinking. How will people cross the Bristol Road? what will the actual traffic consequences of pedestrian lights be if they were to be built? what will happen on the network of small roads such as Staunton Lane, or the roads to Queen Charlton or Norton Malreward? What will happen when all the cyclists, pedestrians and horseriders are forced to take cars to get somewhere to do the things they want to do, and which are healthy? How can a line of shops (pictured in the plan) be a community social centre? What has been learnt from the layouts of the Whitchurch estate, which relies on multiple car use and ownership and where, for the size of population, there is still relatively little in the way of active community spaces internal or external even after many years?

### Spatial Strategy Options

**Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?**

Option 3 - Dispersed approach

**Q3 - Please give reasons for your answer**

the focussed approach is essentially a new town at Whitchurch. Presumably, compared to the distributed option, this minimises the number of existing BANES residents who are significantly affected. But there is insufficient evidence that the transport, employment and environmental and social effects have been properly considered.

### Strategic Development Location: Whitchurch

**Q13a - What additional aspirations would you have here?**

Retaining the "open gap" at the positions labelled 1 would help preserve the character of the existing village.

**Q13b - How can this vision be delivered?**

**Q14a - Is this the right approach?**

No

**Q14a - Please give reasons for your answer**

see above

**Q14b - Could some development take place in other areas outside of this broad development location?**

It is not clear why Queen Charlton should be left unaffected, if Whitchurch is to be completely transformed.

However there are strong arguments for leaving Maes Knoll protected, not only for its environmental and historical significance but because of it

**Q15 - What should happen with the existing separation between Whitchurch village and Bristol urban area? Should we:**

Close the gap with development, and potentially have less development elsewhere?

**Q15 - Please give reasons for your answer**

The gap appears not to be extensively used, nor highly visible and accessible, compared to the walking and cycling on the green belt on the south side of Whitchurch (south of Church Lane,

around St Nicholas)

**Q16a - How could the existing village centre be enhanced to cater for the needs of an increased population?**

The congestion and effects of heavy traffic on the Bristol Road south of the junction with Church Lane will be intolerable unless there are extensive measures to prevent traffic from using it. These would need to be more than providing a link road, as the

**Q16b - How do we best integrate new local centre and facilities with the existing communities?**

**Q17a - How can we improve the quality of green spaces, and ensure that people have better access to recreational facilities...**

Leaving the fields, hedgerows, streams and trees without houses on them would be the best option. Failing that, minimising car ownership, lorry and van traffic on small roads or on the Bristol Road, providing space for community activities (not just shopp

**Q17b - How could we make more of Stockwood Vale or Maes Knoll as important environmental assets to the local area? Could...**

Maes Knoll, of itself, and with its views in all directions, should be protected as an important, and accessible, landmark.

**Q18a - How can we enhance routes for walking and cycling, for example to Keynsham and towards Bristol?**

By ensuring any new build does not decrease the useability of the existing networks of small roads and lanes.

**Q18b - How can we encourage greater use of public transport?**

By reducing the amount of parking space available, and ensuring it is possible and pleasant to walk to bus stops.

**Q18c - How can we encourage people to be more active, more often?**

By creating play spaces, keeping access to the countryside and quiet roads that can be reached without getting in a car, sports centres, and keeping access to the green belt

**Q18d - What other ideas could be explored to achieve these objectives?**

**Q19 - What sort of employment would be suitable as part of the new development and how much?**

Shouldn't houses be built where employment exists, rather than the other way round? There is no economic evidence that building houses of itself increases productivity or employment in a sustainable way. The question of employment points to building on br

**Respondent**

<b>Name</b>	John Diver
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**Housing Needs and Student Accommodation**

**Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...**

Option 3

## Respondent

<b>Name</b>	Jim Docherty
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## Housing Needs and Student Accommodation

<b>Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...</b>
PBSA is the only way forward together with limiting the maximum Student numbers for both unis to a level that is reasonable for a city the size of Bath student numbers must be capped. Preference is for Options 3 and 4 but with the proviso that areas in Bath like OFP which already have high student numbers should be exempt from any new PBSA
<b>Q21b - Are there any other options?</b>
Capping student numbers at an agreed level to prevent uncontrolled expansion Areas where student numbers in Homs already exceed maximum target numbers should be exempted from PBSA developments

## Respondent

<b>Name</b>	Barbara Dowty
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## Development Precedents

<b>Q20a - What are the qualities of the places on pages 24 to 27 that could be used in either of the new development areas?</b>
<b>Q20b - What aspects should we seek to avoid?</b>
Avoid using green belt and conservation areas The houses shown are not in keeping with the rural and historical areas in our villages like Wellow
<b>Q20c - What other precedents would you use?</b>
No development that would fundamentally change the ambience of rural villages or effect wildlife habitats and movement corridors. Avoid light pollution at all costs

## General

<b>Any other comments?</b>
Land availability assessment - map 32: The areas shown as available are ones already proven to be unsuitable for housing on grounds of over development, green belt and conservation areas; being established wildlife habitats and with poor access routes. I am firmly opposed to any further housing development on the land to the North of Manor Close, Wellow. Refs. Well3 & Well4 LPCFS2017/JSP on the proposed Local Plan. This land is on Green Belt and outside the Housing Development Boundary. Farm Lane and Bath Hill is very narrow and would not support any further traffic. Farm Lane is single track highway with nowhere to pass. It is very dangerous for horse riders and pedestrians when they meet traffic in this area as visibility is poor around the bends, that have high walls and banks each side. This land adjacent to Manor Barn and Manor Farm Barn. Planning permission was only granted on those barns back in the 90s subject to this adjacent land being landscaped and not to be built



on. This should not be changed.  
 This land is also subject to a free flowing water course from a spring on the land above. This causes flooding of adjacent properties, right down the hill to the Manor House, if not kept under control. The owner of this land has never bothered to control this water course and it has always been down to myself to keep the water course clear to stop flooding.  
 The owner of this land (WELL3) lives miles away in East Grinstead and has never bothered with any upkeep of it. He is only interested in developing it for pure profit.  
 This land is also a haven for wildlife, such as bats, door mice, hedgehogs, badgers, birds, including woodpeckers and breeding colonies of slow worms.

## Respondent

<b>Name</b>	Sharon Dunford
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## Strategic Development Location: Whitchurch

<b>Q13a - What additional aspirations would you have here?</b>
None
<b>Q13b - How can this vision be delivered?</b>
It can't

<b>Q14a - Is this the right approach?</b>
No
<b>Q14a - Please give reasons for your answer</b>
<b>Q14b - Could some development take place in other areas outside of this broad development location?</b>
Queen Charlton is a very pretty Village & many times in the report it states its the Queen Charlton Conservation Area, all this wii do is turn it into an island, traffic will be the major problem as already the village has become a major rat run with no t
<b>Q14c - What would be the benefits of this?</b>
None
<b>Q14d - What evidence is available to support development in these areas?</b>
None

<b>Q15 - What should happen with the existing separation between Whitchurch village and Bristol urban area? Should we:</b>
Continue to protect the Green Belt gap & keep the village separate?
<b>Q15 - Please give reasons for your answer</b>
We have enough new development

## Respondent

<b>Name</b>	Gwen Edwards
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## General

### Any other comments?

I am commenting on [Local Plan 2016-2036 - Issues & Options Consultation - Winter 2017], Page 23, Question 14b Could some development take place in other areas outside of this broad development location? For example: In Stockwood Vale

And my response is: no, development should not take place in Stockwood Vale. Doing so would bridge the strategic gap between Bristol and Keynsham, we would become one. This is not good for the distinctive character of Keynsham, or and detrimental to the distinctive character of BANES.

Additionally, the wildlife in Stockwood Vale is considerable: deer, badgers, foxes of course, plus many owls, breeding buzzards, kingfishers and otters, as well as the nationally rare and geographically specific Bath Asparagus which grows prolifically here. The valley is also prone to flooding (causing access issues on Old Bristol Road multiple times per year), and has many springs which move seasonally. It is therefore politically, conversationally and geographically unsuitable.

## Respondent

<b>Name</b>	Chris Eke
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## General

### Any other comments?

Please can serious consideration be given to Helipads throughout the BANES area. Applications set in areas of ANOB and Green Belt should have a strict policy to help officers make informed decisions.

## Respondent

<b>Name</b>	Erika
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## Vision and Spatial Priorities

### Q1 - Have we identified the critical issues facing the District over the next 20 years?

Social housing, affordable housing and housing in general are clearly a big issue.

There is perfectly good social housing in Fox Hill. But 542 homes are going to be demolished. Many of there's are social homes. They will be replaced with less social homes whilst destroying an established community, not listening to residents or opposition, I'd say that was a big problem.

How is this helping towards the social housing needs of Bath?

## Housing Needs and Student Accommodation

### Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...

There is no one option. But option 3 seems to feature some good points. Keep students on campus where possible. Build more pbsa on campus where possible. The universities are big enough. There's a huge amount of new pbsa in the city. Isn't this enough? I realise that students are our future, that the university is a big employer etc. But there has to be a cut off point. No more growth. There are so many HMO's in Oldfield Park and other areas, it's like a ghost town when term finishes. Bath has housing problems and employment problems. Return HMO's to family homes. Put students in the new pbsa. Stop the growth of universities for a period of time. Stop building new pbsa (and hotels) on prime employment sites.

### Q21b - Are there any other options?

Do not build on green belt land. Once it's gone, it's likely gone forever. For our future generations.

## General

### Any other comments?

I'm so disappointed every time I walk around Bath. So much building and it's all geared towards either students or tourism. I realise that both play an important part. But expansion just can't go on unchecked without ruining the life chances of people or the character of the city. There are not enough homes in the city. It seems obvious to me why this is. Stop university expansion and stop building pbsa and more hotels, cafes and bars.

There are no decent jobs. It's all cafes, restaurants and hotels. How can anyone afford to live on those kind of salaries? Why has industry left Bath? Keep brownfield sites as employment land. Create reasonable rents and incentives for businesses.

People have to travel far from the city to work in jobs with good salaries. This creates problems on the roads, increases pollution and affects work life balance.

## Respondent

<b>Name</b>	Dominic Fay
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## Strategic Development Location: Whitchurch

### Q13a - What additional aspirations would you have here?

To preserve the green belt and particularly the tranquility of stockwood vale and the conservation area of Queen Charlton.

### Q13b - How can this vision be delivered?

By no further housing development or road building in this area

### Q14a - Is this the right approach?

No

### Q14a - Please give reasons for your answer

See above - encroaches on the tranquility of stockwood vale and the conservation area of Queen Charlton.

<b>Q14b - Could some development take place in other areas outside of this broad development location?</b>
No - these are valuable assets and their character would be destroyed by development
<b>Q15 - What should happen with the existing separation between Whitchurch village and Bristol urban area? Should we:</b>
Close the gap with development, and potentially have less development elsewhere?
<b>Q15 - Please give reasons for your answer</b>
Prevent further sprawl south of Whitchurch into the rural space

## Respondent

<b>Name</b>	Steve Ford
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## General

<b>Any other comments?</b>
as a resident of Oldfield park in a road that has 19 H.M.Os out of 50 houses were parking is near impossible during term time i object strongly to PBSO developments in the city and wish all should be on campus or very near even if green belt land is used for PBSO developments

## Respondent

<b>Name</b>	Neil and Carolyn Fountain
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## Strategic Development Location: Whitchurch

<b>Q13a - What additional aspirations would you have here?</b>
Committed (rather than token) protection of the Queen Charlton Conservation Area.
<b>Q13b - How can this vision be delivered?</b>
Having a much larger 'buffer' between the proposed new developments and Queen Charlton. The new developments should be more balanced on both sides of the A37 not on 1 side only. Road through the village should be resident-only.

<b>Q14a - Is this the right approach?</b>
Yes
<b>Q14a - Please give reasons for your answer</b>
See answer above - at present Maess Knoll is being given a much much larger buffer zone than Queen Charlton. I agree that Maess Knoll does need safeguarding but the proposals' balance is skewed rather than sensible.
<b>Q14b - Could some development take place in other areas outside of this broad development location?</b>
Yes, if the growth numbers are accepted, then more could be put on the west side of the A37 without being detrimental to Maess Knoll, at the same time this would enhance the protection of Queen Charlton.
<b>Q14c - What would be the benefits of this?</b>
See answer above

**Q14d - What evidence is available to support development in these areas?**

The original draft proposals indicated that the option to build on the west side of the A37 was equally valid as the east side.

**Q15 - What should happen with the existing separation between Whitchurch village and Bristol urban area? Should we:**

Continue to protect the Green Belt gap & keep the village separate?

**Q16a - How could the existing village centre be enhanced to cater for the needs of an increased population?**

Difficult without building an A37 bypass.

**Q16b - How do we best integrate new local centre and facilities with the existing communities?**

Increase safe pedestrian and cycle routes, make through-road car access difficult

**Q17a - How can we improve the quality of green spaces, and ensure that people have better access to recreational facilities...**

See answer to 16b - investment is needed, make decent park facilities e.g. a lake, plant a woodland, put in community allotments

**Q17b -How could we make more of Stockwood Vale or Maes Knoll as important environmental assets to the local area? Could...**

Don't see why not.

**Q18a - How can we enhance routes for walking and cycling, for example to Keynsham and towards Bristol?**

Build an A37 bypass so that existing roads can be used safely for cyclists and pedestrians.

**Q18b - How can we encourage greater use of public transport?**

Have to reduce traffic on the A37, there's no point building a park & ride facility into Bristol when the current road is already terribly congested, not only at peak times. Can the old railway lines be used?

Decent regular services.

Cheap fares.

**Q19 - What sort of employment would be suitable as part of the new development and how much?**

Not much - have to recognise that employment will be concentrated in city centres, particularly Bristol, and therefore this development at Whitchurch will be commuter - focussed. Could have a small-scale office park, industrial would be out of place.

**Respondent**

<b>Name</b>	Alison Francomb
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**Strategic Development Location: Whitchurch**

**Q13a - What additional aspirations would you have here?**

To remain a Village/Community

**Q13b - How can this vision be delivered?**

To remain a Village/Community

<b>Q14a - Is this the right approach?</b>
No
<b>Q14a - Please give reasons for your answer</b>
Whitchurch Village will be destroyed
<b>Q14b - Could some development take place in other areas outside of this broad development location?</b>
I don't think any of the suggested alternative sites are appropriate. More sustainable site would be Brislington/Hicksgate. This site is near the Ring Road, Park and Ride, Rail station for commute to Bath/Bristol, shops, doctors surgery, schools, Post Of
<b>Q14c - What would be the benefits of this?</b>
Development at the above site is near good infrastructure. This lowers car use/mileage.
<b>Q14d - What evidence is available to support development in these areas?</b>
Infrastructure here is present. Whitchurch Village cannot offer any of the above, making it a very unsustainable location.

<b>Q15 - What should happen with the existing separation between Whitchurch village and Bristol urban area? Should we:</b>
Continue to protect the Green Belt gap & keep the village separate?
<b>Q15 - Please give reasons for your answer</b>
We have had 3 village surveys over the last 3 years. 98% of respondents with the Green Belt to be retained and use Brownfield Sites elsewhere.

<b>Q16a - How could the existing village centre be enhanced to cater for the needs of an increased population?</b>
The existing village centre could not be enhanced. The village would no longer be a village. In a recent survey 100% of respondents wished the village to remain a village.
<b>Q16b - How do we best integrate new local centre and facilities with the existing communities?</b>
Impossible. Whitchurch Village will become a town/urban extension, dormitory commuter estate.

<b>Q17a - How can we improve the quality of green spaces, and ensure that people have better access to recreational facilities...</b>
The Green Belt at present has many clubs for leisure and the remainder is in agricultural use with footpaths for recreational use.
<b>Q17b -How could we make more of Stockwood Vale or Maes Knoll as important environmental assets to the local area? Could...</b>
Maes Knoll stands approximately 800ft above sea level. It is very high location on the top of Dundry Hill. It already has footpaths giving access for the fit who can climb.

<b>Q18a - How can we enhance routes for walking and cycling, for example to Keynsham and towards Bristol?</b>
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.
<b>Q18b - How can we encourage greater use of public transport?</b>
How can we use the bus if there are no bus services.
<b>Q18c - How can we encourage people to be more active, more often?</b>
If they were able to walk to work.
<b>Q18d - What other ideas could be explored to achieve these objectives?</b>
If peoples houses were placed in Bristol with more high rise or brownfield sites, such as the now

abandoned Arena, Lloyds Bank & Norwich Union building.

**Q19 - What sort of employment would be suitable as part of the new development and how much?**

Possibly IT based employment.

**Name** Jeremy Furber

### General

**Any other comments?**

I have lived in a Grade 2 listed house in the centre of Queen Charlton for 35 years. Professional valuers have told me that, significantly influenced by the new houses already built and about to be built that the value of my house has reduced by 25% within the last three years. This is a conservation village where NO new houses have been built in my time here. Nor do I or other villagers want new houses. Through traffic needs to be reduced and much better controlled as now it is threatening the quality of life here and becoming an increasing safety hazard, as traffic speeds through the village on a narrow bendy road that regularly accommodates horses with riders and often children.

### Respondent

**Name** Penny Gallagher  
Retired

### Housing Needs and Student Accommodation

**Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...**

Option 3 & Option 5 combined

**Q21b - Are there any other options?**

No

### Respondent

**Name** William Gaskell

### Vision and Spatial Priorities

**Q1 - Have we identified the critical issues facing the District over the next 20 years?**

No

**Q1 - Please give reasons for your answer**

You need to add names of people to explicitly state how you are accommodating people. Such as education, qualifications, discriminating on the legal parameters, rather than on protected characteristics such as financial details or disability. Hence, when you talk about a solution, I feel that

recreation is not enough, but giving people room in their house to work, such as a study with soundproofing for a consultant to work from home, a garage for a junior manager to keep a car. Rather than making libellous statements against local residents by mentioning the environment. I also feel that Bath needs to discuss things such as high ceilings - focus on living space as this is a gripe of civil servants in London who have had to vacate their plush Empire era offices for more cramped modern offices and to attract their talent from London we can reverse the decline in our plan for Bath.

**Q2: Are the suggested spatial priorities the right ones?**

Yes

**Q2 - Please give reasons for your answer**

Well balanced but the focus should be on benefits rather than environment, the environment is a benefit rather than a focus. I mean Bath is the city where an educated elite gets a family house with a study and garage, proper insulation from the environment and 22 foot high ceilings for proper head room to think rather than a studio apartment bachelor pad exposed to passers by.

### Spatial Strategy Options

**Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?**

Option 2 - Focussed approach

**Q3 - Please give reasons for your answer**

I want to live in a community where I can feel safe and at home, the dispersed nature of our society created by social upheaval in Bath has left me feeling like it is difficult to be productive and make money due to unhealthy and disruptive competition. Such as strangers moving in to private residence and turning it in to HMO without any permissions then all the health complications and disruption to career as a result.

**Q4 - Are there any other approaches/scenarios you think should be considered for accommodating non-strategic growth in B&NES**

Yes

**Q4 - Please give reasons for your answer**

I think it is worth investing in local schemes, such as building novel developments in unique environments, such as a "hobbit style house" if work is required to underpin a hillside below a grade 1 listed structure to prevent landslide, rather than not developing the space or only carrying out partial work. I also think there should be a compensation scheme worked out so that at least 50% of profits are dispersed to local residents to spend in the city rather than sending the money abroad.

**Q5a - Have we considered all the issues?**

### Development Precedents

**Q20a - What are the qualities of the places on pages 24 to 27 that could be used in either of the new development areas?**

We need all new developments to have secure bike sheds.

**Q20b - What aspects should we seek to avoid?**

Avoid high maintenance structure, a lot of houses in Bath are over 200 years old and this makes Bath famous as Georgian Bath.

**Q20c - What other precedents would you use?**

I want a detached 2-bedroom property, 2 bathroom, 2 storey with attic and basement, study, dinning room, living room and kitchen with utility room, garage and small lawn all around property.



Looking for something on a 10x10m plot with house on 8x8 m plan.

## Housing Needs and Student Accommodation

### Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...

I support option 4 if the housing quality for students is high: there needs to be a standard of accommodation to encourage students to live life to the full, with reception room for meeting friends, bedroom and study included in their package rather than a cramped all in one. I would support a prefabricated structure if each student was given accommodation with proper structure, enough room to grow but not to compete with a superior qualification being housed by the plan.

### Q21b - Are there any other options?

Students can also be allowed to live with families if they are happy to accept what it would involve. If houses are built with servants quarters or office space above a garage, a student could stay their if the family did not hire a servant or use an office.

## General

### Any other comments?

Focus should be on energy security with devices such as solar panels, batteries and UPS devices, 1 GBPS internet installed to maintain high standard of services.

## Respondent

<b>Name</b>	Anthony Griffin
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## Strategic Development Location: Whitchurch

### Q13a - What additional aspirations would you have here?

Reasonable housing development but nothing like the numbers suggested (2500)

### Q13b - How can this vision be delivered?

By listening to the residents of Whitchurch Village 97% of whom have voted for the Neighbourhood Plan which has now been formally accepted by BANES.

### Q14a - Is this the right approach?

No

### Q14a - Please give reasons for your answer

This village is not a sustainable location to take 2500 houses. There is no infrastructure to support these numbers & implementation will destroy a village that has a predominant farming history. To dump these housing numbers would be undemocratic & unfai

### Q14b - Could some development take place in other areas outside of this broad development location?

There are sufficient alternative sites in & around Bristol & Bath , including brown field, that could each take a proportion of the required housing. However Maes Knoll & the surrounding area should not be impacted by houses as an historical view would be

### Q14c - What would be the benefits of this?

A fairer dispersal of housing numbers with less impact on surface water in a concentrated area

### Q14d - What evidence is available to support development in these areas?

The answer is self evident.

**Q15 - What should happen with the existing separation between Whitchurch village and Bristol urban area? Should we:**

Continue to protect the Green Belt gap & keep the village separate?

**Q15 - Please give reasons for your answer**

I have made this clear above. Whitchurch Village does not want to be an urbanised extension to Bristol

### Respondent

<b>Name</b>	Michele Gross
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### Housing Needs and Student Accommodation

**Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...**

Option 3 in Table 3. This site should be used for normal homes as there are already too many student blocks in the city but too few affordable homes.

### Respondent

<b>Name</b>	Michele Gross
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### Housing Needs and Student Accommodation

**Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...**

I feel that Option 3 should be the approach for Bath.

### General

**Any other comments?**

I also believe the Universities should not be allowed to continue to grow ad infinitum if the City of Bath is ever going to maintain a balance of student to non-student occupation. These ever growing numbers of students being housed in the City, as opposed to on the campuses, is leading to an increase in buses which in turn impacts upon the quality of urban air.

### Respondent

<b>Name</b>	M Hales
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### Spatial Strategy Options

**Q4 - Are there any other approaches/scenarios you think should be considered for accommodating non-strategic growth in B&NES**

Yes

**Q4 - Please give reasons for your answer**

The Broad Options need to consider/include flooding and exacerbating the flood risk, as limiting factors. Flooding is problematic in a number of places within B&NES e.g. whilst Chew Magna offers a broad range of services and facilities it is very susceptible to flooding. This would be exacerbated by development of any scale. There are extremely few sites in such villages that would not impact on existing housing either directly from run off or indirectly via run off into the rivers.

**Respondent**

<b>Name</b>	Derek Hart
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**Vision and Spatial Priorities**

**Q1 - Have we identified the critical issues facing the District over the next 20 years?**

No

**Q1 - Please give reasons for your answer**

The biggest omission is a Saltford bypass.

Traffic won't just go away if you ignore it. The A4 through Saltford is horrific every day.

Saltford needs a by-pass, and ideally a train station.

Where is reference to moving the Brislington Park & Ride to Hicksgate? This is a terrible idea. Hicksgate is an awful interchange now and to add to this by having the park and ride here would make the problem far worse.

**Q2: Are the suggested spatial priorities the right ones?**

No

**Q2 - Please give reasons for your answer**

Should state clearly that you won't allow further building on flood planes.

**Spatial Strategy Options**

**Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?**

Option 3 - Dispersed approach

**Q5a - Have we considered all the issues?**

No

**Q5a - Please give reasons for your answer**

You have omitted:

- Potential move of the Brislington Park & Ride to Hicksgate
- Improvement of the Hicksgate junction.
- Building of a Saltford by-pass - would impact this area.
- Removal of ridiculous one way system on Keynsham High Street
- Traffic at Avon Mill Road/Keynsham Road junction. Traffic Lights?

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

Transport study of air quality at Hicks Gate

## Strategic Development Location: North Keynsham

### Q6a What are your views on the vision and objectives?

Support modal link Road.  
Avon Mill Road/Keynsham junction already chaotic - wouldn't the drawn link Road make this worse - should you do another road from the link Road to Keynsham Road.

### Q7a - What do you think of the proposed road alignment?

Support modal link Road.  
Avon Mill Road/Keynsham junction already chaotic - wouldn't the drawn link Road make this worse - should you do another road from the link Road to Keynsham Road.  
Need a Salford by-pass as well.

### Q8b - Do you think it is important to create a healthy neighbourhood by encouraging walking and cycling?

Yes

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

Yes

### Q12c - Do you agree with the requirement to link with the Bristol to Bath cycle path?

Yes

### Q12c - Please give reasons for your answer

It would help to take more traffic off the roads

## Respondent

<b>Name</b>	Elizabeth Hearn
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## Housing Needs and Student Accommodation

### Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...

Option 3. University growth should be maintained within it's boundaries Very concerned that Bath Spa would consider under this option PBSR'ing sites like ex Herman Milller factory and ex Print Services site on Dartmouth Ave. By Campus we mean Newton Park and Claverton Down sites. It's time the universities took full responsibility for the full impact of it's business on the city and it's residents.

AND Option 5 - I may have misunderstood but they don't look mutually exclusive. If you have more academic buildings to put more students in for learning they are going to need somewhere to live. Don't give permission for more academic space unless there is a plan for where to put the associated students. PBSR on campus - back to option 3.

### Q21b - Are there any other options?

Agreeing a limit to student numbers in Bath is not unreasonable. It's not fair on the students for one - they get a place at Uni and no-where to live. When demand is greater than supply the prices go through the roof. It's time the universities stopped seeing the city as an endless housing resource. It's time the city leaders said 'no' to the universities. At what point is Bath 'full' to university growth? It;s not endless. It's time a limit was agreed.

## General

### Any other comments?

I am really against using Green Belt land for PBSR's. Can you imagine if the battle for Bathampton meadows was saved from a car park - only to turn into PBSR's? madness!

## Respondent

<b>Name</b>	James Henderson
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## Housing Needs and Student Accommodation

### Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...

3

### Q21b - Are there any other options?

if PBSA is to be built outside of campus then they should be included in the HMO cap - so areas such as Oldfield Park and east twerton cannot get anymore due to the social imbalance already being tipped.

## Respondent

<b>Name</b>	Natasha Hobbs
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## Housing Needs and Student Accommodation

### Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...

Option 3.

### Q21b - Are there any other options?

4 (provided the evidence for the release of Green Belt land is very strong) or 5 would be acceptable.

## Respondent

<b>Name</b>	Clive Honeychurch
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## Vision and Spatial Priorities

### Q1 - Have we identified the critical issues facing the District over the next 20 years?

No

### Q1 - Please give reasons for your answer

Q1 The whole document is asking the public to provide responses to specific questions that B@NES wants to ask, and to receive answers that are broadly in line with the proposed policy. The structure of the questions only allows residents to respond in a constrained manner and not to properly identify their concerns. The document does not make it clear that residents can to make comments on issues that are important to them, irrespective of whether or not they are identified in the plan. This can only be found out when they reach the end of the on-line response form.

<b>Q2: Are the suggested spatial priorities the right ones?</b>
No
<b>Q2 - Please give reasons for your answer</b>
<p>Q2 The suggested ‘Critical Issues’ recognise the difficulties associated with traffic congestion but the ‘Spatial Priorities’ fails acknowledge that some of these difficulties can only be practically resolved by strategically located new road infrastructure/improvements. There is also nothing in Spatial Priority 6 to encourage the increased use of electric vehicles.</p> <p>There seems to be a highly optimistic and unfounded assumption in Spatial Priorities 6 and 7 that the increasing transport needs can be met for the most part by public transport and active travel. To be economically viable, public transport requires a population of adequate (a) mass and (b) density, together with (c) a fairly level of demand throughout the day, which ideally equates to running a system that is constantly operating near full capacity. Irrespective of costs, users of public transport require (a) to get to their destination at a given time, (b) stops to be located close to where they live (c) stops located close to their destination, (d) frequent services, (e) minimum changes of vehicle (with attendant delays) and (f) reasonable total journey times from source to final destination. Hence for B&amp;NES, public transport will tend to be most viable in Bath, least viable in a village that is remote from an arterial road, and of limited viability in a town like Keynsham. Park and ride schemes work best when parking is readily accessible, the ‘rides’ are frequent and have stops close to final destinations. In practical terms, the requirements of the previous paragraph also need to be met.</p> <p>With ever increasing health and social care costs there is unlikely that there will ever be enough money available in local authority budgets to permanently subsidise much needed public transport services that are unfortunately unprofitable to operate.</p> <p>Walking and cycling connections are limited by distance, physical capability, the need to carry loads and small children, and willingness of the population to actually use them, especially during bad weather. Generally speaking, the willingness of people to use active transport increases only after congestion has become so bad that this option becomes the least unattractive one (which has been the case in major cities like Bristol and Bath). (This also explains why air quality issues are far worse in major cities than in Keynsham).</p>

### Spatial Strategy Options

<b>Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?</b>
Option 1 - Continue the existing hierarchical approach
<b>Q3 - Please give reasons for your answer</b>
<p>Q3 Disregard the option selected because I was trying to select all 3 but the system only allows the selection of one option. There is no single best scenario. Each part of the community has its own issues dependent upon its location, population needs, and existing infrastructure. (e.g. The needs of Timsbury, Keynsham and Bath are totally different. The whole document seems to assume that the solutions to the problems of Bath are equally applicable to everywhere else in the B@NES area.</p>

<b>Q4 - Are there any other approaches/scenarios you think should be considered for accommodating non-strategic growth in B&amp;NES</b>
<b>Q4 - Please give reasons for your answer</b>
<p>Q4. Fig 9 only give numbers. It does not give % increase in population for the locations shown. This masks the burden that each area shares of the increased housing.</p> <p>Each location should be examined as it exists and its issues identified. An assessment should be</p>

made on the current adequacy of its infrastructure and the ability of the population to access the employment and other requirements it requires. Next look at the possible additional population and see what can be reasonably assimilated and how much additional infrastructure support is needed. Some locations will need a modest increase in infrastructure and others heavy expenditure. The key is the additional expenditure per head of additional population.

There seems to be an unwarranted assumption that the transport requirements of the increased population can be accomplished with active travel, increased bus services and green measures. There is no mention of the possibility of a rail station and P&R east of Keynsham. Difficult to achieve but would make a serious contribution to reducing A4 commuting traffic into Bristol and Bath.

**Q5a - Have we considered all the issues?**

No

**Q5a - Please give reasons for your answer**

5a\_1. No. Definitely not. The whole plan assumes that draft proposals in the West of England Combined Authority Spatial and Transport Plans are sound and will provide answers to the existing transport infrastructure problems in the surrounding area. It also fails to comply with B@NES Local Plan Spatial Priority No.6 to “Deliver well connected places accessible by sustainable means of transport and to “Help to manage congestion through the location and form of development”. The whole WECA and B&NES strategy for the A4 Bath-Bristol corridor seems to assume that most motorists using the section between Salford and Hicks Gate are heading for central Bristol or Bath and that metrobus/bus along this route will accommodate their needs. This is far from reality as many such journeys on this section are either long distance, or have originating points and/or destinations in areas which cannot realistically and economically connected by metrobus or other forms of public transport. There are many examples of the latter case affecting parts of Bristol and adjacent South Glos where, for reasons such as historical development and physical barriers, public transport is constrained to a limited number of radial routes and hence is sparse elsewhere.

5a\_2. There are two existing external transport issues that have a major negative impact on Keynsham. These mean that that narrow roads in the town currently have to contend with both necessary inbound and outbound traffic, plus unwanted through traffic. It is through traffic that currently causes much of the traffic congestion in Keynsham.

1. There is currently insufficient road capacity from Hicks Gate through the A4 pinch point at West Town Lane, which at busy times causes a tailback that effectively blocks the west bound exit from the Hicks Gate roundabout. This leads to clogged up incoming roads to Hicks Gate roundabout from north, south and east. Hicks Gate roundabout therefore becomes further pinch point created by the first one: and this in turn encourages through traffic in Keynsham to avoid the problem.

2. Very few drivers willingly venture into the congestion of Bristol or Bath to cross the River Avon. There are only two crossing points of the River Avon between Bath and well inside the Bristol boundary. These are A4174 north of Hicks Gate and Station Road, Keynsham. Avoidance of Bristol and Bath crossing points, both increases traffic from miles around into the Hicks Gate pinch point and also attracts through traffic into Keynsham (mainly using Station Road and Charlton Road or Wellsway).

5a\_3. B&NES Local Plan means that Keynsham will increase in size by somewhere around 30% or possibly more. In view of its location, geography and size, it is likely that there will be more than one vehicle per household.

Most traffic generated by Keynsham Residents when leaving and re-entering the town either uses of encounters A4 or uses Station Road. These are essential routes and are already are subject to congestion. Irrespective of where any housing development is located, increasing the population of Keynsham by any given percentage will increase the traffic on those two essential routes by a similar figure.

Most people purchasing a new house in Keynsham will presumably already be employed outside of

Keynsham, whereas most employment opportunities created in Keynsham will probably be filled by competitive processes that will attract people into Keynsham for work. It is questionable whether metrobus and other forms of public transport (which are most cost effective when operating ‘point to point’), and ‘active travel’ (which is most effective for short journeys) will effectively take more than a fraction of the increased inbound and outbound commuting traffic. Increasing the population of Keynsham by the required figures requires the following specific traffic focused infrastructure improvements to prevent Keynsham roads from being further congested:

1. The westbound A4 road capacity through the traffic lights at West Town Lane needs to be increased to allow two lanes of traffic onto Brislington Hill (need cooperation with Bristol via WECA). This measure is essential to reduce congestion at Hicks Gate roundabout.
2. The capacity of the Hicks Gate roundabout and its eastern approach from the Keynsham bypass need to be increased to better facilitate the north bound traffic crossing the River Avon.
3. The link road from Hicks Gate to A37 needs to be built, irrespective of number of new homes located at Whitchurch. There is already too much through traffic associated with A37 south of Whitchurch using Charlton Road in Keynsham to access river crossings.
4. The capacity of a park and ride facility at Hicks Gate needs to be at least 50% bigger than that currently at Brislington.

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

5b. There needs to be evidence that the West of England Combined Authority Spatial and Transport Plans and the B@NES Local plan when combined, will satisfactorily address the existing issues raised in 5a.

5b\_1 The problems identified in 5a1a are likely to be exacerbated by the re-siting of the Brislington park and ride facility to Hicks Gate. The building of 700 homes on the Brislington site, with presumably at least one car per household, will increase the number of vehicles heading onto A4, exacerbating the problems back at Hicks Gate.

It is envisaged that there will be an additional 1,803 new homes built at Whitchurch, for which there is stiff, coordinated resistance. Should fewer homes be built, there will be a temptation for B@NES to try to relocate the shortfall to Keynsham and further exacerbate existing problems.

Much faith is being put in a link road being constructed between Whitchurch and Keynsham. If fewer homes are sited at Whitchurch, then there might be a lower requirement for this link. If the link were to be omitted then there would be an increase in unwanted traffic using Keynsham as a short cut.

If the link from A37 to A4 were to be built, then it is essential that the Hicks Gate roundabout should not be an impediment for vehicles from the link travelling north onto A4174 ring road or East towards Bath, otherwise there will be the temptation to use Charlton Road in Keynsham to avoid the congestion.

The layout of roads associated with the new Whitchurch developments should be so located that traffic cannot conveniently access A4 or Station Road in Keynsham by means of Charlton Road or Wellsway (via Chewton Keynsham).

There needs to be a clear plan agreed between B@NES and WECA that sets out exactly how all the conflicting future requirements of the Hicks Gate roundabout and associated P&R scheme will be resolved in practical terms. These conflicting requirements include:

1. Efficient movement of vehicular traffic through the north/south/east/west interchange.
2. Efficient interchange of bus and metrobus passengers changing north/south/east/west directions of travel.
3. Requirements for motorists to efficiently enter the P&R facility, and later to return in the direction from whence they came.
4. Access from the P&R car park to the bus and metrobus pick up/drop off points.
5. Accommodation of P&R shuttle facilities for Keynsham residents and visitors to Keynsham that are in line with the above requirements for longer distance passenger services.



- |    |   |
|----|---|
| 6. | Efficient routes for cyclists and pedestrians to safely navigate the road interchanges. |
| 7. | At least 50% more parking capacity than the existing facility at Brislington.           |
| 8. | Security in line with the existing facility at Brislington plus CCTV.                   |

## Strategic Development Location: North Keynsham

### Q6a What are your views on the vision and objectives?

6.a The vision promotes the prospect of a green utopia. In reality is that there are very fundamental problems:

1. The area is effectively an island with inadequate links to the outside world. It will only work if most people live, work, shop, socialise and generally go about their daily lives without leaving the island.
2. The siting of 1,400 homes in this area puts an increased burden on the already overloaded external transport network.
3. There is the unwarranted assumption that, if lots of paths and cycle lanes are created and public transport is improved, people will automatically transfer to these methods of getting around. The reality is (as has been shown in both Bristol and Bath) people will only make less journeys by car after roads have become totally gridlocked. These new residents will be located roughly 0.5 to 2 miles from the station, 0.3 to 1.5 miles from the Broadmead roundabout on the A4 (which in turn is 0.8 miles from the centre of the High Street). (see also comments on public transport Question 2) There is already inadequate car parking adjacent to the centre of Keynsham to meet peak time demand. A high percentage of existing shops are now starting to experience loss of trade because shoppers are voting with their vehicles and shopping elsewhere where they can park. It is becoming a race with the early Keynsham visitors getting available spaces and later visitors going elsewhere (or even being dropped in and picked up!). Note: In the short term, it has been noticed that available 2 hour parking spaces have increased in Civic Centre car park since the High Street trial period one way system has been in operation, whilst all other car parks remain full throughout peak usage period. Many shops in Keynsham have reported less trade during this period, which suggests that shoppers are not being directed into the Civic centre car park and/or no longer shopping in Keynsham.

### Q6b What type of place should be created here?

6.b There is a need to sort out the external problems associated with this site before it is possible to determine the type of place that created here in any detail.

### Q7a - What do you think of the proposed road alignment?

7.a

Proposed alignment leads directly into congestion areas i.e. Avon Mill Lane and A4. (See responses to 5.a and 5.b). It should also be noted that Avon Mill Road is often congested along its full length at peak times; and leads onto Station Road which is also required to take traffic from the 800 new homes currently under construction at Somerville.

The "multi modal road" has three incompatible functions:

- (i) Provide a high capacity through route to keep traffic out of the town centre.
- (ii) Provide sufficient capacity to allow the accommodation of 1400 homes along the route, and the connection of these to the town and the external road network.
- (iii) Passively reduce speeds to those suitable for a residential area.

All existing tunnels under the railway are only one vehicle wide and have limited height. If anything, the road capacity of the tunnel adjacent to the Broadmead roundabout should be doubled and the height increased. It should also provide (possibly separate) facilities for pedestrians and cyclists.

This requires substantial infrastructure expenditure (especially if the tunnels have historic significance).

The proposed new road bridge across the railway would have to be fairly high to allow future electrification of the railway.

It would be preferable to completely segregate vehicles from pedestrians and cyclists. It would be preferable for the through road to be to the north of the development and the through route for cyclists and pedestrians to be on the south side. By doing this, there would be a reduced need for pedestrians and cyclists to cross a major vehicular route.

Thought should be given as to precisely how residents are going to walk, cycle, use public transport or drive to (i) town centre, (ii) local supermarket (not the cheapest), (iii) Bristol (centre, south and north), (iv) Bath, (v) M4 (east and west), (vi) M5 (north and south) as well as (vii) the local leisure amenities, marina, cycle path, walks etc.

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

7b. see 7a

**Q8a - What do you think of the proposed approach to the street network and wider connections?**

8.a The strategy for external connections is stated in Spatial Priority 7 and associated bullet points 1 and 2. (The proposed strategy does not:- “Ensure the timely and efficient provision of infrastructure to support growing communities”, “Direct development to those locations well served or capable of being well served by infrastructure in a cost-effective and efficient manner”, “Ensure the alignment of the development of new housing with the provision of all necessary infrastructure”.)

The whole plan will fall apart if the overall transport strategy for Keynsham and the surrounding region leads to even more congestion than there is at present. The correct road infrastructure and transit systems have to be provided and proved to reduce congestion before increasing the number of homes by schemes like the one for north Keynsham. This will clarify the need for the link road and its connections and then the local situation can be better resolved.

Has adequate consideration been given to the possibility of flooding, particularly with the increase in global warming leading to higher sea levels and significantly increased rainfall.

**Q8b - Do you think it is important to create a healthy neighbourhood by encouraging walking and cycling?**

Yes

**Q8b - Please give reasons for your answer**

8b. Yes, walking and cycling should be encouraged but in itself will not compensate for lack of physical road infrastructure.

**Q9a - What do you think of the proposed response to landscape impact, especially considering views from the Cotswolds?**

9a. It’s almost always possible to plant trees, irrespective of other considerations.

**Q9b - How can we improve the Green Infrastructure network through the site?**

9b. Significant thought should be given to child safety particularly with all the water in the neighbourhood.

**Q10a - What should the housing mix comprise of?**

10 a Hopefully there will be a very diverse neighbourhood suitable for all age ranges.

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

10 b. Student accommodation is not suitable for this location, particularly in view of the distances to the nearest universities and the ability of students to safely access them.

<b>Q11a - Do you agree with the principle of aiming for a Zero Carbon development?</b>
Yes
<b>Q11a - Please give reasons for your answer</b>
11a. Yes, depending on how it will be achieved
<b>Q11b - How ambitious should we be? How do you think this aim could be achieved?</b>
11b. You need to talk to practical experts and not just to "œfluffy" dreamers.

<b>Q12a - How can Avon Valley Wildlife &amp; Adventure Park be best integrated into the new development?</b>
12a. Just need a simple road connection and car park
<b>Q12b - What opportunities are there to minimise visual impact from the Cotswolds?</b>
12.b As 9a.
<b>Q12c - Do you agree with the requirement to link with the Bristol to Bath cycle path?</b>
Yes
<b>Q12c - Please give reasons for your answer</b>
12.c Yes. Glad it is referred to as a cycle path and not a cycle track. Needs speed restrictions and enforcement and/or widening/segregation to ensure pedestrian safety. At present there are too many "œChris Froome lookalikes" using it as a race tra

### Strategic Development Location: Whitchurch

<b>Q13a - What additional aspirations would you have here?</b>
13a The A4-A37 link road should encourage all traffic coming from Whitchurch area and A37 (including the existing traffic), to use it and thence to cross the River Avon via the A4174 ring road and not use Charlton Road in Keynsham. There should be no other links to this road that will encourage other consequential traffic dodging short cuts or lead to more traffic from further building development. All road links to this estate should encourage connection to the new link road or onto A37 if heading to Bristol (preferably via public transport).
<b>Q13b - How can this vision be delivered?</b>
13b. In order to achieve the objective stated in 13a. the A4-A37 link road will need to have sufficient capacity for two lanes of traffic both ways, and not just the metrobus. There may be a need for a separate additional lane in each direction through junctions (only), to speed metrobus past queues in the other lanes.

<b>Q14b - Could some development take place in other areas outside of this broad development location?</b>
14b. Development at Queen Charlton and Stockwood Vale would add to the problems associated with using Keynsham as a short cut. See 13a and 5b and other previous associated comments.
<b>Q14c - What would be the benefits of this?</b>

### Development Precedents

<b>Q20a - What are the qualities of the places on pages 24 to 27 that could be used in either of the new development areas?</b>
20a. This looks like a property developer's sales brochure and highly idealistic. I fully support the need for attractive design to enhance localities where people live. It is easy to have this vision, but far more difficult to specify in a Local Pla
<b>Q20b - What aspects should we seek to avoid?</b>

## General

### Any other comments?

Any other comments: The consultation document does not indicate that this option exists at the end of the on-line consultation response form. Had I known earlier that this option existed earlier, I would have structured my responses differently; putting general strategic considerations such as those that apply to both N. Keynsham and Whitchurch into this area.

## Respondent

<b>Name</b>	Clive Honeychurch
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## General

### Any other comments?

I submit below my response to the current WECA Spatial Plan “Jan 2018. This gives a far better and more cohesive response to much of the B@NES Local Plan than the one which I submitted at the end of December 2017.

The structure of the Local Plan questions only allows residents to respond in a very constrained manner and not to properly identify their concerns. It focuses attention only on specific developments such as North Keynsham and Whitchurch and fails to look at other smaller developments that will no doubt proceed anyway. The Local Plan also fails to recognise that both the identified, and unidentified, proposed developments will not only affect the residents that will live in and near them. These developments and the associated wider transport infrastructure needed to support them, will also impact on other residents living within the associated local regions, B@NES area, and beyond.

My response to the WECA Spatial Plan should be also be considered as amplifying my response to the B@NES Local Plan. My original responses to Questions 5a, 5b, 6a, 7a, 7b, 13a,13b of the B@NES Local Plan may be deleted as this material is covered in my response to the WECA Spatial Plan

West of England Combined Authority Spatial Plan Jan 2018  
Requirements for Keynsham and the Surrounding Region

#### EXECUTIVE SUMMARY

Keynsham is required to take its share of much needed house building in the period up until 2036. The current consultation documents produced by B@NES and WECA show little understanding of the physical constraints on the transport infrastructure of this region. The following document needs to carefully read in its entirety to fully appreciate the issues involved. In order to accommodate the proposed increased housing either, or both, of the following strategies must be adopted:

1. Regional transport infrastructure improvements need to provide much greater capacity than is currently proposed.
2. Essential, but unprofitable, public transport routes will need to be subsidised in perpetuity.

#### INTRODUCTION

It is possible to deliver all the needed housing envisaged by the B@NES Local plan for Keynsham. However, it is unlikely that this can be successfully achieved unless there are significant improvements to the Local Plan and the WECA proposals, particularly in relation to the road transport infrastructure.

This submission examines the limitations of public transport and active travel together with the strategy adopted in both the B@NES and WECA spatial proposals; and shows how they affect the Keynsham region. Keynsham has very specific transport problems due to its physical location between two major cities, its geography and its historical development. These factors, taken with the existing inadequate transport infrastructure, make the location of any increased housing difficult to assimilate in Keynsham. The proposed location of homes in North Keynsham is particularly challenging. The situation in Keynsham is further complicated by proposals for new homes at Whitchurch and on the existing Brislington P&R site.

WECA and B@NES Spatial plans already make significant improvements to public transport and active travel provisions. Examination of the issues identified in the preceding paragraph, lead to a number of specific infrastructure proposals that also need to be adopted to ensure that Keynsham retains the viability of its town centre, and does not suffer the congestion problems of Bristol and Bath.

#### LIMITATIONS OF PUBLIC TRANSPORT AND ACTIVE TRAVEL

To be economically viable, public transport requires a population of adequate (a) mass and (b) density, together with (c) a fairly level of demand throughout the day, which ideally equates to running a system that is constantly operating near full capacity. Irrespective of costs, users of public transport require (a) to get to their destination at a given time, (b) stops to be located close to where they live (c) stops located close to their destination, (d) frequent services, (e) minimum changes of vehicle (with attendant delays) and (f) reasonable total journey times from source to final destination. Hence for B&NES, public transport will tend to be most viable in Bath, least viable in a village that is remote from an arterial road, and of limited viability in a town like Keynsham.

Park and ride schemes work best when parking is readily accessible, the routes are frequent and have stops close to final destinations. In practical terms, the requirements of the previous paragraph also need to be met.

With ever increasing health and social care costs there is unlikely that there will ever be enough money available in local authority budgets to permanently subsidise much needed public transport services that are unfortunately unprofitable to operate.

In practical terms, consider a Keynsham resident living on the south-east perimeter of the town. Assuming that there were to be a local shuttle bus, a bus journey commute into a part of Bristol that is not near the central area would involve:- walk-wait-bus-wait-metrobus-walk-wait-bus-walk. This would typically take about 2 hours with probably over an hour involved in walking and waiting. The only practical ways to reduce the time would be very frequent services and conveniently positioned bus stops. A visit by a family of four to relatives, would be both costly and time consuming.

Walking and cycling connections are limited by distance, physical capability, the need to carry loads and small children, and willingness of the population to actually use them, especially during bad weather. There is a definite need to improve cycling provisions throughout the area, but it also has to be acknowledged that the people most likely to use them are currently already cyclists. Generally speaking, the willingness of additional people to use active transport increases only after congestion has become so bad that this option becomes the least unattractive one (which has been the case in major cities like Bristol and Bath). This also explains why air quality issues are far worse in major cities than in Keynsham.

#### LIMITATIONS OF WECA AND B@NES GENERAL STRATEGY

The WECA and B@NES strategy seems to assume that the solutions to the problems of Bath and Bristol are equally applicable everywhere else. There seems to be a highly optimistic and unfounded assumption that the increasing transport needs throughout the region can be met for the most part by public transport and active travel.

In reality, there is no single strategy that can be uniformly applied. Each part of the community has its own issues dependent upon its location, population needs, and existing infrastructure (e.g. within

B@NES the needs of Timsbury, Keynsham and Bath are totally different). In addition, steps need to be taken to ensure that when the West of England Combined Authority Spatial and Transport Plans and the B@NES Local plan are combined, then the overall result is coherent and addresses the issues raised in this submission.

Each location needs to be examined as it currently exists and the relevant issues identified. An assessment should be made on the current adequacy of its infrastructure and the ability of the population to access the employment and other requirements it needs. These issues have to be assessed before considering additional population. From this it can be established the increase that can be reasonably assimilated and how much additional infrastructure support is needed. Some locations will need a modest increase in infrastructure and others heavy expenditure. The key is the additional expenditure per head of additional population.

The whole WECA and B&NES strategy for the A4 Bath-Bristol corridor seems to assume that most motorists using the section between Salford and Hicks Gate are heading for central Bristol or Bath and that metrobus/bus along this route will accommodate their needs. This is far from reality as many such journeys on this section are either long distance (via A road or motorway), or have originating points and/or destinations in areas which cannot realistically and economically be connected by metrobus or other forms of public transport. There are many examples of the latter case affecting parts of Bristol and adjacent South Gloucestershire where, for reasons such as historical development and physical barriers, public transport is constrained to a limited number of radial routes and hence is sparse elsewhere.

#### LIMITATIONS OF KEYNSHAM'S GEOGRAPHY

Keynsham is constrained by the following two sets of physical barriers into three poorly interconnected areas:

1. A4 Keynsham bypass and the parallel intercity railway line segregate North Keynsham from the rest of Keynsham
2. South of the bypass, the River Chew and its associated valley separate West and East Keynsham.

The above barriers are substantial and further interconnection would be both expensive to carry out and would impact negatively on the beauty of the area. The situation is further complicated by differing levels caused by hilly terrain descending into both the Avon and Chew valleys. The rivers running through these valleys also restrict traffic movements.

There are two places in Keynsham where it is possible to cross the River Chew:

1. Bath Hill.
2. Avon Mill Lane (accessed by a one vehicle wide, restricted height tunnel).

There are two places where it is locally possible to cross the River Avon:

1. A4175 Station Road (within the town).
2. A4174 Ring Road (outside the town).

Historical development of Keynsham has also resulted in width limitations that further restrict traffic movements on a number of the main roads adjacent to the town centre.

#### KEYNSHAM'S EXISTING TRANSPORT PROBLEMS

There are two existing external transport issues that have a major negative impact on Keynsham. These mean that narrow roads in the town currently have to contend with both necessary inbound and outbound traffic, plus unwanted through traffic. It is through traffic that currently causes much of the traffic congestion in Keynsham itself.

1. There is currently insufficient road capacity from Hicks Gate to beyond the A4 pinch point at West Town Lane in Bristol, which at busy times causes a tailback that effectively blocks the west bound exit from the Hicks Gate roundabout. This leads to clogged up incoming roads to Hicks Gate roundabout from north, south and east. Hicks Gate roundabout therefore becomes further pinch point created by the first one: and this in turn encourages through traffic in Keynsham to avoid the

problem.

2. Very few drivers throughout the region willingly venture into the congestion of Bristol or Bath to cross the River Avon. There are only two crossing points of the River Avon between Bath and well inside the Bristol boundary. These are A4174 north of Hicks Gate and Station Road, Keynsham. Avoidance of Bristol and Bath crossing points, both increases traffic from miles around into the Hicks Gate pinch point and also attracts through traffic into Keynsham (mainly using Station Road and Charlton Road or Wellsway)

Most traffic generated by Keynsham Residents when leaving and re-entering the town either uses or encounters A4, or uses Station Road. These are essential routes and are already are subject to congestion. Irrespective of where any housing development is located, increasing the population of Keynsham by any given percentage will increase the traffic on those two essential routes by a similar figure.

#### GENERAL PROBLEMS CONCERNING THE SITING OF NEW HOUSING IN KEYNSHAM

WECA Spatial Plan and B&NES Local Plan means that Keynsham will increase in size by somewhere around 30% or possibly more. In view of its location, geography and size, it is likely that there will be more than one vehicle per household.

Most people purchasing a new house in Keynsham will presumably already be employed outside of Keynsham, whereas most employment opportunities created in Keynsham will probably be filled by competitive processes that will attract people into Keynsham for work. It is questionable whether metrobus and other forms of public transport (which are most cost effective when operating 'point to point'), and 'active travel' (which is most effective for short journeys) will effectively take more than a fraction of the increased inbound and outbound commuting traffic.

The future viability of Keynsham town centre also needs to be addressed. There is already inadequate car parking adjacent to the centre of Keynsham to meet peak time demand. A high percentage of existing shops are now starting to experience loss of trade because shoppers are voting with their vehicles and shopping elsewhere where they can park. It is becoming a race with the early Keynsham visitors getting available spaces and later visitors going elsewhere (or even being dropped in and picked up!). Note: In recent weeks, it has been noticed that the availability of 2 hour parking spaces has increased in Civic Centre car park since the High Street trial period one way system has been in operation, whilst all other (mainly longer term) car parks remain full throughout peak usage periods. Many shops in Keynsham have reported less trade during this period, which suggests that shoppers are either not being directed into the Civic centre car park and/or no longer shopping in Keynsham, because there is a lack of quick, convenient access.

#### SPECIFIC PROBLEMS ASSOCIATED WITH NORTH KEYNSHAM

The B&NES vision for this area promotes the prospect of a green utopia. In reality there are very fundamental issues that cannot be ignored:

1. The area is effectively an island with inadequate links to the outside world. It will only work if most people live, work, shop, socialise and generally go about their daily lives without leaving the island.

2. The siting of 1,400 homes in this area puts an increased burden on the already overloaded external transport network. There is a need to sort out the external road problems associated with this site before it is possible to determine the type of place that created here in any detail.

3. There is the unwarranted assumption that, if lots of paths and cycle lanes are created and public transport is improved, people will automatically transfer to these methods of getting around. The reality is (as has been shown in both Bristol and Bath) people will only make less journeys by car after roads have become totally gridlocked. These new residents will be located roughly 0.5 to 2 miles from the station, 0.3 to 1.5 miles from the Broadmead roundabout on the A4 (which in turn is 0.8 miles from the centre of the High Street).

4. The proposed 'multi modal' link road through the site has three incompatible

functions:

- a. Provide a high capacity through route to keep traffic out of the town centre.
- b. Provide sufficient capacity to allow the accommodation of 1400 homes along the route, and the connection of these to the town and the external road network.
- c. Passively reduce speeds to those suitable for a residential housing area.
5. The proposed "multi modal" link road alignment leads directly into congestion areas i.e. Avon Mill Lane and A4. It should also be noted that Avon Mill Lane is often congested along its full length at peak times; and leads onto Station Road which is also required to take traffic from the 800 new homes currently under construction at Somerville. The Avon Mill Lane/ Station Rd junction has a public car park entrance 20m to the east. Measured from the junction to the west, are the Station car park entrance at 110m, a proposed pedestrian crossing with lights at 120m, Somerdale Estate junction with proposed traffic lights at 180m and the roundabout where Station Rd meets Bristol Rd and High St at 420m. Therefore, this roundabout at the end of High Street will become even more congested by the succession of traffic lights and junctions on Station Road. Other new traffic produced by North Keynsham residents will travel onto the A4 via the middle and eastern connections of the link road, and thence towards congestion areas in Saltford, Keynsham Town Centre or Hicks Gate.
6. It would be preferable to completely segregate vehicles from pedestrians and cyclists in North Keynsham instead having a "multi modal" link as proposed by B@NES. It would be preferable for the main through road to be to the north of the development and the through route for cyclists and pedestrians to be on the south side. By doing this, there would be a reduced need for pedestrians and cyclists to cross a major vehicular route.
7. All existing tunnels under the railway are only one vehicle wide and have limited height. If anything, the road capacity of the tunnel adjacent to the Broadmead roundabout should be doubled and the height increased. It should also provide (possibly separate) facilities for pedestrians and cyclists. This requires substantial infrastructure expenditure (especially if the tunnels have historic significance).
8. The proposed new road bridge across the railway at the eastern end of the site would have to be fairly high to allow future rail electrification.
9. Thought should be given as to precisely how residents are going to walk, cycle, use public transport or drive to (a) Keynsham town centre, (b) nearest supermarket (not the cheapest), (c) Bristol (centre, south and north), (d) Bath (e), M4 (east and west), (f) M5 (north and south) as well as (g) the local leisure amenities, marina, Bristol-Bath cycle path, walks etc.
10. Has adequate consideration been given to the possibility of flooding, particularly with the predicted increase in global warming leading to higher sea levels and significantly increased rainfall?

#### FACTORS SPECIFIC TO WHITCHURCH THAT WILL AFFECT KEYNSHAM

It is envisaged that there will be an additional 1,803 new homes built at Whitchurch, for which there is stiff, coordinated resistance. There are also believed to be serious issues due to ground water that might affect the number of homes that can be built here. Should fewer homes be built, there will be a very strong temptation for B@NES to try to relocate the shortfall to Keynsham and cause further problems for the town.

The A4-A37 link road should be so constructed and routed, as to direct all traffic coming from Whitchurch area and A37 (including the existing traffic), straight to Hicks Gate in order to cross the River Avon by means of the A4174 ring road. There should be no other connections onto the link road that will encourage other consequential traffic dodging short cuts or lead to more traffic from other as yet unspecified building development. It is imperative that all road links to the new development at Whitchurch should encourage connection to the new link road or onto A37 if heading to Bristol (preferably via public transport). Traffic should be physically discouraged from using Charlton Road (or other roads) in Keynsham as a congestion dodging short cut.

In order to achieve the objective stated in the preceding paragraph, the A4-A37 link road will need



to have sufficient capacity for two lanes of traffic both ways, and not just the metrobus. There may be a need for a separate additional lane in each direction through junctions, to speed metrobus past queues in the other lanes.

Much faith is being put in the link road between Whitchurch and Hicks Gate. If fewer homes are sited at Whitchurch than originally planned, then there might then be a lower requirement for this link. The consequence of not installing the link would be an increase in unwanted traffic from the reduced new housing at Whitchurch using Keynsham as a short cut.

There should be no development at Queen Charlton or Stockwood Vale (both located between Whitchurch and Keynsham) as this would again encourage the use of Keynsham as a short cut.

#### OTHER SIGNIFICANT FACTORS THAT WILL AFFECT KEYNSHAM

The problems originating from the congestion on A4 into Bristol are likely to be exacerbated by the re-siting of the Brislington park and ride facility to Hicks Gate. The building of 700 homes on the Brislington site, with presumably at least one car per household, will increase the number of vehicles heading onto A4, exacerbating the problems at West Town Lane and back at Hicks Gate.

There is no mention of the possibility of a rail station and P&R east of Saltford. This would be difficult to achieve due to the multiple competing interests associated with the current privatised system, plus the need to secure both the necessary land and vehicular access routes to and from the site. However, this option would make a serious contribution to reducing A4 commuting traffic into Bristol and Bath and needs to be vigorously pursued.

#### SUMMARY OF SPECIFICALLY NEEDED INFRASTRUCTURE

Increasing the population of Keynsham by the required figures requires the following specific traffic focused infrastructure improvements to prevent Keynsham roads from being further congested:

1. The westbound A4 road capacity through the traffic lights at West Town Lane needs to be increased to allow two lanes of traffic onto Brislington Hill (needs cooperation with Bristol via WECA). This measure is essential to reduce congestion at Hicks Gate roundabout.
2. The capacity of the Hicks Gate roundabout needs to be increased, and the north and eastern approaches modified. This is to ensure that the east/north flow of traffic crossing the River Avon in both directions is not impeded by the tail backs caused by blockage of the westbound exit of the roundabout.
3. The link road from Hicks Gate to A37 needs to be built, irrespective of number of new homes located at Whitchurch. There is already too much through traffic associated with A37 south of Whitchurch using Charlton Road in Keynsham to access river crossings.
4. The capacity of a proposed park and ride facility at Hicks Gate needs to be at least 50% bigger than that currently at Brislington to cope with the additional traffic from North Keynsham and to provide a potential P&R for Keynsham itself.
5. There needs to be a clear plan agreed between B@NES and WECA that sets out exactly how all the conflicting future requirements of the Hicks Gate roundabout and associated P&R scheme will be resolved in practical terms. These conflicting requirements include:
  - a. Efficient movement of vehicular traffic through the north/south/east/west interchange
  - b. Efficient interchange of bus and metrobus passengers changing north/south/east/west directions of travel.
  - c. Requirements for motorists to efficiently enter the P&R facility, and later to return in the direction from whence they came.
  - d. Pedestrian access from the P&R car park to the bus and metrobus pick up/drop off points.
  - e. Accommodation of P&R shuttle facilities for Keynsham residents and visitors to Keynsham, that are in line with requirement (d) for longer distance passenger services.
  - f. Efficient routes for cyclists and pedestrians to safely navigate the road interchanges.
  - g. Security in line with the existing facility at Brislington plus CCTV.
6. The link road through North Keynsham will need to connect efficiently with the adjacent

transport network in the following ways:

- a. Via a bridge over the railway line, which is sufficiently high to allow future electrification, and then onto a new roundabout on A4 at the eastern end.
- b. A tunnel of sufficient height and width to accommodate two lanes of traffic leading onto the Broadmead roundabout. (Note: this is also needed to allow traffic to cross the river Avon to and from Wellsway without adding to traffic close to the town centre).
- c. Via Avon Mill Lane onto a new roundabout on Station Road. This location should also allow pedestrians and cyclists to cross Station Road. (Note: if three sets of traffic lights were to be installed in series on the 180m stretch of Station Road between the Somerdale development and Avon Mill Lane this would create tail backs affecting Keynsham High Street).

#### CONCLUSIONS

In order to assimilate the proposed development in Bath and North East Somerset envisaged by WECA Spatial Plan, the proposals for public transport and active travel within it need to be implemented. On their own, however, these measures will not be sufficient to prevent excessive traffic congestion in the Keynsham region and to ensure the viability of Keynsham town centre. In perpetuity subsidisation of unprofitable public transport is unlikely to solve all the issues or be politically possible. Hence, for the reasons stated in this submission, all the proposals for transport infrastructure identified in the preceding section need to be implemented in full.

## Respondent

<b>Name</b>	Andrew Hoyes
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## General

### Any other comments?

My comments relate directly to Site reference A31 Weston Slopes North Lower; however, they are also applicable to site reference A311 Weston Slopes North Upper. I object to any development on these 2 sites as the land is Green Belt, part of the World Heritage Site (WHS), within the Cotswolds Area of Outstanding Natural Beauty (AONB), partly lies within the Bath Conservation Area, contains heritage assets and is susceptible to flooding and land slip and was found unsuitable for development by the Government Planning Inspector less than 4 years ago. Please see individual numbered comments below:

1. In June 2014 the majority of Site A31 was removed from potential development sites by B&NES Council because it was unsuitable for development. Paragraph 167 of Simon Emerson's, the Government Planning Inspector, report to B&NES council dated 24 June 2014 refers: 167. The Council's background evidence at March 2013 and in support of the chosen sites in November 2013 assessed a long strip of land on the northern and north-eastern edge of Weston. The three chosen sites represent less than half of the area assessed. The other land was considered by the Council unsuitable for development for a variety of reasons including the impact on the AONB and WHS and more technical issues relating to land stability and surface water flooding. None of the rejected land was seriously advanced by others for allocation in this plan.

Nothing has changed since June 2014 and the land remains unsuitable for development; in particular the technical issues due to the instability of the land and flood risk.

2. In his report to B&NES Council Simon Emerson, stated the following in regards to Site A31 at

Paragraph 7 of his report dated 24 June 2014:

7. The Council had proposed a change to make a fifth strategic housing allocation requiring land to be removed from the Green Belt at Weston, Bath. That proposal has not been recommended as a modification to the submitted plan as the exceptional circumstances necessary to change Green Belt boundaries and to justify major development in an Area of Outstanding Natural Beauty are not met in that location for the scale of development proposed.

Nothing has changes since June 2014 and the fact remains that the exceptional circumstances required to remove the land in Site A31 from the Green Belt do not exist.

3. Removal of Site A31 from the Green Belt would damage the special character of Bath. See paragraph 169 of Simon Emerson’s report copied below:

169. All of the allocated land is within the Green Belt. The Council accepts that there would be some harm to Green Belt purposes. The appraisal of Green Belt purposes for land at Weston is in the Green Belt Stage 2 Report (Overview, Table 3.2.4 CD9/E9). The Green Belt here restricts sprawl, safeguards the countryside from encroachment and preserves the special character of Bath. These purposes overlap with other designations, such as the AONB and WHS, which I consider further below.

Again, nothing has changed since June 2014 and this land should remain within the Green Belt.

4. Development of Site A31 would cause substantial harm to heritage assets; paragraph 125 of Simon Emerson’s report refers:

125. Three of the strategic allocation policies published in November 2013, namely: CSA22 (Odd Down); CSA25 (Weston); and CSA45 (Whitchurch), contain similar wording in relation to the protection of heritage assets - that development causing substantial harm to designated heritage assets and/or their settings should be avoided (my emphasis). This wording is particularly relevant to the WHS for both sites at Bath and for the Wansdyke Scheduled Monument (SM) at Odd Down.

Nothing has changed since June 2014 and the heritage assets remain in danger of substantial harm if development on Sites A31 and A311 where to go ahead.

5. B&NES Council previously argued that ‘screening’ would mitigate the effects of negative visual impact on the AONB and WHS on the green hillsides of the Lower Weston Slopes. Simon Emerson disagreed with the argument for screening in paragraph 176 of his report and stated that the Council had underestimated the visual impact at some of the hillside locations at paragraph 178:

176. The Council’s overall assessment for the AONB and WHS shows considerable variation of impact across the three sites. A high negative impact is identified for the western part of the land west of Lansdown Lane (field C West) and the eastern half of the Equestrian Centre (field F Central and Eastern) with medium negative impact for the rest of those two sites. The Concept Diagrams indicates that built development should be avoided on most of the land where the impact is identified as high negative. However, from what I saw from the footpaths referred to above, the differing assessment across these fields is rather arbitrary and the visual impact of built development would be similar across much of the land. Built development would be a widely noticeable extension of Weston up the slope. Because of the elevation of these views, planting would not screen built development in the short or medium term.

178. All of the allocated land and the intervening and adjoining land is identified as important green

hillsides in the WHS Setting SPD (CD9/W1, Draft SPD, Map 4; adopted SPD Map 5). As previously indicated, I regard these hillsides as an important consideration in the assessment of the effect of development on the WHS and/or its setting. Given this context, the proposed allocation would result in significant harm to the WHS, albeit less than substantial harm as it would affect only a small part of the WHS. There would be the loss of a clear component of what makes the WHS special in this area. The allocation would also represent the erosion of a high quality landscape integral to the AONB. The Council's assessment in relation to the WHS and AONB underestimates the impact in some of the locations.

Nothing has changed since June 2014 and any development on the Weston Slopes would still have a negative impact on the AONB and WHS and therefore I object to developing sites A31 and A311.

6. Development on sites A31 and A311 because it would destroy part of the Bath Conservation Area. Paragraph 180 of Simon Emerson's report refers below:

180. I turn now to the Bath Conservation Area. This covers much of Bath, but excludes most of the 20th Century housing estates on the periphery and does not include built development at Upper Weston. Surprisingly, there is no conservation area appraisal to set out what makes the conservation area special, but overall it would be similar to the OUV of the WHS. The conservation area incorporates a large part of the undeveloped eastern slopes above Weston, up to the Lansdown plateau. Within this area are three listed farmhouses and Beckford's Tower. This part of the conservation area thus incorporates the rural setting for these listed buildings. All of this undeveloped part of the conservation area is identified as an important green hillside in the WHS Setting SPD.

I strongly object to any development on the green hillsides of the Bath Conservation Area. A conservation area is there to conserve the landscape and should be adhered to.

7. The land on sites A31 and A311 are unsuitable for development due to the instability of the land on the steep slopes and the many underground water courses that cross these sites. Simon Emerson referred to it in paragraph 182 of his 2014 report:

182. There are a number of other issues to be taken into account in assessing the suitability of the land at Weston for development, but none makes a significant difference either for or against development here. Potential flooding from both surface water and ground water and potential land instability would need to be taken into account in the detailed layout and design of development. These matters were assessed by the Council in the Water Infrastructure and Geotechnical Prioritisation Report (CD9/I3).

Nothing with regards to underground water and instability has changed on these sites since 2014; the cost of diverting underground water courses and shoring up unstable land would add massive costs to building and surely make development on these sites subject to future risk from subsidence and flooding and as such is inappropriate.

8. In June 2014 Simon Emerson stated that there were no exceptional circumstances to remove the land on the Lower Weston Slopes from the Green Belt:

184. In this case, the benefits do not clearly outweigh the harm that would arise to the AONB, the WHS and the conservation area. In as much as the Green Belt here serves purposes which underpin and support the qualities that make these designations special, there are not the exceptional

circumstances to justify removing land from the Green Belt or for major development within the AONB. The proposed allocation would not help make the plan sound and should not be made. At Weston I do not make any change to the submitted plan.

There are still no exceptional circumstances today as nothing has changed since Simon Emerson wrote his report in 2014. I would challenge any decision made to the contrary.

## Respondent

<b>Name</b>	Steve Hunt
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## Vision and Spatial Priorities

**Q1 - Have we identified the critical issues facing the District over the next 20 years?**

Yes

**Q1 - Please give reasons for your answer**

Yes I believe so, however feel that although considered, there remains a huge deficit in terms of a need to resolve some of the transport issues due to the nature of Keynsham and the small tributary road ways that serve the community. Although areas for development have been identified there needs to be a balance in terms of maintaining some areas of greenbelt.

**Q2: Are the suggested spatial priorities the right ones?**

Yes

## Spatial Strategy Options

**Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?**

Option 3 - Dispersed approach

**Q3 - Please give reasons for your answer**

Sharing the growth is a better way to progress.

**Q4 - Are there any other approaches/scenarios you think should be considered for accommodating non-strategic growth in B&NES**

No

## General

**Any other comments?**

There are options other than the creation of separate accommodation for students, such as lodging arrangements within existing accommodation which could in turn work out better value for the student. There is also likely to be a down-turn in the number of Young People who are able to follow college courses due to cost.

**Respondent**

<b>Name</b>	P Jones
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**Spatial Strategy Options**

**Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?**

**Q3 - Please give reasons for your answer**

I have no particular leaning towards any approach.  
 My reasoning is why not let all smaller RA2 villages take a fair share of housing (10-15 dwellings) as Banes were looking for in the placemaking plan originally. More homes could be built in small rural villages (overlooked by councils, in the case of Camelot land at Camerton, that CAN and are WILLING to accommodate ) that in turn would alleviate some need for new housing or free up a lot more existing homes in built up areas. Then it could be determined if less desirable locations, due to greenfield, greenbelt, aesthetic locations need to be used.  
 I do not disagree some green belt and other land may be needed, but only if other NON green belt land, etc in small rural areas that have been offered, has been used first. Continually building in already built up areas is fine for the people that want to live there, BUT, lots of people do not want to live in large towns and cities, so they choose to live in more rural areas.  
 The general consensus is more houses are needed nationally. So why not also increase housing in small RA2 areas as well as the RA1.

**Q4 - Are there any other approaches/scenarios you think should be considered for accommodating non-strategic growth in B&NES**

Yes

**Q4 - Please give reasons for your answer**

Surely more rural homes for the people that want to live there, would then free up more properties in towns and cities.  
 Any increase in new homes should be over the whole broader spectrum of towns and cities down to the villages of RA2, not only RA1. This would hopefully then bring back the life to smaller villages, far too often the local shop/post office/meeting place has disappeared, meaning residents have to travel to neighbouring areas. This ruins small rural communities, even though "building communities" is the buzzword for everywhere else!  
 My evidence is for anyone to look around them, driving around areas, looking at maps. People choose to live in rural areas as others choose to live in built up areas. But providing even less rural homes is very short sighted. It will only succeed in driving up prices and availability, and so growing families and future generations will be unable to live near relatives when they wish to start their families.  
 Rural areas would then only be habited by the elderly and economically well-off, not really diverse family communities (if that is not already the case).  
 Small rural areas receive less of the benefits of "economic prosperity" nor do they appear on "strategic priorities", over other "communities" as laid out in the JSP, even though they contribute to the local council tax AND their own parish tax.

## Respondent

<b>Name</b>	Lindy Leahy
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## Vision and Spatial Priorities

<b>Q1 - Have we identified the critical issues facing the District over the next 20 years?</b>
No
<b>Q1 - Please give reasons for your answer</b>
Much more emphasis on transport and public transport. Much more understanding and emphasis on communities, including community lead development, and integration.
<b>Q2: Are the suggested spatial priorities the right ones?</b>
Yes

## Spatial Strategy Options

<b>Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?</b>
Option 2 - Focussed approach
<b>Q3 - Please give reasons for your answer</b>
Concentrating on a few sites/villages as mentioned in the report will enable in depth meaningful work with those existing communities to potentially create fantastic schemes that are not just run of the mill developer lead ones that more often and not disappoint. The more involved and control the community has the more likely planning will be supported and the resulting scheme will deliver the objectives.
<b>Q4 - Are there any other approaches/scenarios you think should be considered for accommodating non-strategic growth in B&amp;NES</b>
Yes
<b>Q4 - Please give reasons for your answer</b>
Community land trusts, community lead development. This enables buy in, connectivity with existing communities and better quality schemes.
<b>Q5a - Have we considered all the issues?</b>
Yes

## Strategic Development Location: North Keynsham

<b>Q6a What are your views on the vision and objectives?</b>
Greater emphasai on how it works and connects with the existing community.
<b>Q6b What type of place should be created here?</b>
It should build on the very positive existing community and the space should be one that existng community can utilise as much as the new residents coming into the new homes.
<b>Q7a - What do you think of the proposed road alignment?</b>
Fine

**Q8b - Do you think it is important to create a healthy neighbourhood by encouraging walking and cycling?**

Yes

**Q8b - Please give reasons for your answer**

Make the streets prioritise non car users, let people own them not cars.

**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?**

Lots of smaller quality green spaces that have a purpose e.g. gardening, fruit trees, play spaces, chilling spaces etc. Possibly one larger one to provide space for larger gatherings etc.

**Q10a - What should the housing mix comprise of?**

The full range from social rented to outright sale. Include some flexible private rented housing. Provide housing for students that is suitable to other single people, intergenerational. Housing for older people, extra care scheme again intergenerational

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

Yes see above response.

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

Yes

**Q11a - Please give reasons for your answer**

Without local authorities and getting behind this the private sector will not deliver and in this day and age on sites such as this it is imperative that design is cutting age. Should be thinking about use of technology too, assisted living etc.

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

Extremely ambitious.

**Q12b - What opportunities are there to minimise visual impact from the Cotswolds?**

Low rise building up as near edge of site and view corridors. This keeps the view both ways

**Q12c - Do you agree with the requirement to link with the Bristol to Bath cycle path?**

Yes

**Q12c - Please give reasons for your answer**

It makes sense!

## Development Precedents

**Q20b - What aspects should we seek to avoid?**

Priority of roads being the car

**Q20c - What other precedents would you use?**

Hanham Hall

## General

**Any other comments?**

Creating outdoor space that people want to use positively

Do not leave design to developers create a consortium of smaller developers and affordable housing developers and a CLT to deliver the strategic sites.



## Respondent

<b>Name</b>	Pete Leonard
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## Vision and Spatial Priorities

**Q1 - Have we identified the critical issues facing the District over the next 20 years?**

Yes

**Q2: Are the suggested spatial priorities the right ones?**

Yes

## Spatial Strategy Options

**Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?**

Option 1 - Continue the existing hierarchical approach

## Strategic Development Location: Whitchurch

**Q13a - What additional aspirations would you have here?**

I agree with the majority of suggestions but would enhance the green feel by ensuring there is a large range of open green spaces and enough hidden parking for the majority of new homes. The enhancement of active transport areas is good, as is the carbon neutral policy. New homes must also include AH to compliment the need for younger people to have their own homes in the local area.

**Q13b - How can this vision be delivered?**

Careful planning and considering input from local residents.

**Q14a - Is this the right approach?**

**Q14b - Could some development take place in other areas outside of this broad development location?**

It would be better to keep developments outside of the settings of these areas we must keep areas of significant interest to retain some character of the area to build on them detracts significantly from their importance. There is a sensible broad range o

**Q14c - What would be the benefits of this?**

Not building retains the areas for others to enjoy and are quiet areas which retain a sensible divergence from the city scape around.

**Q14d - What evidence is available to support development in these areas?**

None.

**Q15 - What should happen with the existing separation between Whitchurch village and Bristol urban area? Should we:**

Allow some development, but keep a smaller gap?

**Q15 - Please give reasons for your answer**

I think a gap needs to be retained but can be reduced to ensure it still remains and Whitchuch can still be considered a village separate from Bristol.

**Q16a - How could the existing village centre be enhanced to cater for the needs of an increased population?**

There needs to be s local shop or local cafe to encourage local use of the facilities but this needs to be competitive with the local Tesco Metro which dominates the pricing locally.

**Q16b - How do we best integrate new local centre and facilities with the existing communities?**

Offering interesting activities which will encourage the community to make use of the new facilities and ensure that there is demand and functions and facilities which appeal to all age ranges. Ensure there are good active transport links to the new facil

**Q17a - How can we improve the quality of green spaces, and ensure that people have better access to recreational facilities...**

Encourage use of the areas with activities or events to draw local residents to the facilities.

**Q17b -How could we make more of Stockwood Vale or Maes Knoll as important environmental assets to the local area? Could...**

Keep as a strategic park land and develop paths and routes through to allow discovery trails to encourage their use.

**Q18a - How can we enhance routes for walking and cycling, for example to Keynsham and towards Bristol?**

Ensure the roads are capable of accomodating cycle lanes but more importantly cycle tracks separate from roads ro allow movement between Whitchurch and Keynsham.

**Q18b - How can we encourage greater use of public transport?**

Make it cost sensitive for all to use. Electric vehicles for low carbon and cheap running costs. Make more frequent or on demand.

**Q18c - How can we encourage people to be more active, more often?**

More facilities offering active community based functions within walking distances.

**Q18d - What other ideas could be explored to achieve these objectives?**

Keep costs down to encourage more use.

**Q19 - What sort of employment would be suitable as part of the new development and how much?**

Variety of services and technical from computer science to engineering.

## Development Precedents

**Q20a - What are the qualities of the places on pages 24 to 27 that could be used in either of the new development areas?**

All are of interest in suitable locations.

**Q20b - What aspects should we seek to avoid?**

None should be avoided with exploring their merits and they all seem to offer something.

**Q20c - What other precedents would you use?**

## Housing Needs and Student Accommodation

**Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...**

**Q21b - Are there any other options?**

## Respondent

<b>Name</b>	Jane Lewis
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## Spatial Strategy Options

**Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?**

Option 2 - Focussed approach

**Q3 - Please give reasons for your answer**

Given that the Local Authority has failed to deliver most of the promised elements of its successive local plan(s) over the last 25 years in the area where I live other than housing development, 2 would seem to be the only option that could hope to make the most effective use of resource to coordinate transport, employment and infrastructure with new development instead of reverting to more of the same dysfunctional expansion of housing development boundaries not afforded green belt protection.

## Respondent

<b>Name</b>	Jean Lowe
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## Housing Needs and Student Accommodation

**Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...**

Option 3 is the only option I can support. It returns responsibility for the impact of any expansion of student numbers to the universities themselves. And it removes the ongoing threat that PBSA developments pose to existing employment sites and to sites with the potential for much-needed (and especially low cost) residential development.

I totally oppose Options 1 & 4. Option 1 amounts to a developers'™ charter - your own documentation acknowledges that Purpose Built Student Accommodation (PBSA) is currently being advertised as the highest return property investment currently available, and it is attracting national speculation. The recurrent applications to build PBSA on the Wandsdyke site in Oldfield Park, even though this is a totally unsuitable location for this kind of development, show that developers are keen to exploit the student market in Bath. Only clear, well-thought-out planning guidelines on PBSA, supported by the local population, will prevent the residential areas within our City being irreversibly undermined. Option 4 would require the provision of PBSA to be agreed as requiring "exceptional circumstances"™ which it does not. This would be a nonsensical sacrifice of Green Belt land for developments that benefit only developers and the universities, and which cost local residents and the City's™ environment dearly.

**Q21b - Are there any other options?**

Option 2 as it stands is also unacceptable as presented here. Far more detail would be required about the criteria to be used for identifying suitable sites for this option to be evaluated, together with an assurance that the views of local residents will determine the identification and allocation of suitable sites.

## General

### Any other comments?

A realistic projection of the future demand for student accommodation in Bath is urgently required. The numbers of students needing accommodation may continue to rise but not necessarily at the same rate as in previous years. As you acknowledge, higher fees and more available apprenticeships are beginning to significantly impact the numbers of university applications, and this needs to be factored in. Clearly a proper assessment of the capacity of both universities to provide new on-site residential accommodation for their own students is essential. This is what they should both be aiming to do, but I understand that the University of Bath has been converting some existing on-campus student accommodation into offices without first obtaining planning consent. This is completely unacceptable and needs to be formally challenged. For this reason I strongly support the suggestion in 6.15 that further PBSA off-campus is only permitted if the universities first provide new accommodation on campus. Until then, I believe that the lower estimate of student numbers over the next few years in the Student Accommodation Background Paper should be followed – and this states that with no additional PBSA being built, only a further 6 HMOs would be required across the whole of Bath.

I propose the zoning of residential areas in Bath which already have high levels of HMOs for no further HMOs/PBSA development. While HMOs are preferable to PBSA, both in their rental impact on students (as you acknowledge in the first bullet point in 6.13) but even more particularly in their overall impact on local residential areas, I strongly support the Houses in Multiple Occupation (SPD) initiative which seeks to avoid further concentration of HMOs in particular areas within the City. The answer seems to me to be, in consultation with the existing population to zone those residential areas that currently already have high levels of HMOs (like Oldfield Park) for blanket refusals for any applications for PBSA or HMOs. That would make it absolutely clear to developers where it is worthwhile submitting applications and where it is not, saving time and expense for them, for the planning department and for the local residents who oppose the applications.

## Respondent

Name

M.

## Strategic Development Location: North Keynsham

### Q7a - What do you think of the proposed road alignment?

How can anyone think that the A4 bypass can work ending at Avon mill lane? Avon Mill is really narrow for extra traffic due to the bridge over the River Chew. The “new” road will then exit on to the A4174 which is already tight and really busy. I don’t want more traffic lights they will not work how would you move the river chew / widen the A4174 to 4 lanes / remove the power units / widen the bridge by the lock keeper to prevent it queuing 24/7?

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

there should be more zebra crossings, the crossings in keynsham before the high street one way worked, now it is really busy

### Q8a - What do you think of the proposed approach to the street network and wider connections?

More people only routes away from cars and huge lorries.

### Q8b - Do you think it is important to create a healthy neighbourhood by encouraging walking and cycling?

Yes

**Q8b - Please give reasons for your answer**

More people might not use cars

**Respondent**

<b>Name</b>	David Martin
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**Vision and Spatial Priorities**

**Q1 - Have we identified the critical issues facing the District over the next 20 years?**

Yes

**Q1 - Please give reasons for your answer**

The critical issues are already well known at a B&NES level and within the West Of England. They have not been mitigated by previous plans, and remain a constant source of concern.

**Q2: Are the suggested spatial priorities the right ones?**

Yes

**Q2 - Please give reasons for your answer**

The spatial priorities cover a wide range of issues. Whilst the consultation identifies them, they are very broad brush and aspirational. The devil will be in the detail!

**Spatial Strategy Options**

**Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?**

Option 2 - Focussed approach

**Q3 - Please give reasons for your answer**

Infrastructure and services can be developed within a focused approach, which should be more efficient than either of the other options. Avoiding the imposition of exceptional circumstances that might justify removing land from the Green Belt will be very important.

**Q4 - Are there any other approaches/scenarios you think should be considered for accommodating non-strategic growth in B&NES**

Yes

**Q4 - Please give reasons for your answer**

Whilst I prefer Option 2, there may be scope for a combination of Option 2 with Option 1, so long as the infrastructure problems of dispersal of development can be overcome by suitable investment.

**Development Precedents**

**Q20a - What are the qualities of the places on pages 24 to 27 that could be used in either of the new development areas?**

Energy efficient housing types with green spaces and sustainable urban drainage; pedestrian and cycle friendly routes; strong neighbourhood centres.

**Q20b - What aspects should we seek to avoid?**

Mixture of housing typologies that lack the character that has identified current design in the townships and villages within B&NES

**Q20c - What other precedents would you use?**

Mix of industrial/commercial workspace opportunities within housing developments.

## Housing Needs and Student Accommodation

**Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...**

Option 3 - PBSA only allowed on campus, matched with proposals for additional academic space on campus.

**Q21b - Are there any other options?**

Further University academic and student accommodation expansion to be only approved if it is outside the city of Bath, such as in the Somer Valley or at Keynsham.

## Respondent

<b>Name</b>	Val Mason
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## Housing Needs and Student Accommodation

**Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...**

Option 3

## Respondent

<b>Name</b>	Nancy Mathias
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## General

**Any other comments?**

Local Plan Consultation, Planning Policy, January 8th 2018  
 B&NES, Lewis House, Manvers Street,  
 BATH BA1 1JG

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



## Respondent

<b>Name</b>	Neal Mathias
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## General

<b>Any other comments?</b>	
Local Plan Consultation, Planning Policy, B&NES, Lewis House, Manvers Street, BATH BA1 1JG	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.

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Q17B : Maes Knoll stands approx. 800feet 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.

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desultory.

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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,

Neal Mathias

## Respondent

<b>Name</b>	Georgina McLeod
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## Housing Needs and Student Accommodation

### Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...

Student numbers should be capped and student accommodation should be kept on campus which would reduce traffic pollution and make roads less congested without university buses. This will also protect the local community for families and older people who are long term members of the community and protect office space and stop building on green belts which should never be allowed for student accommodation.

### Q21b - Are there any other options?

Affordable on campus accommodation should be the only option.

## Respondent

<b>Name</b>	Dan Mitchell
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### Q17a - How can we improve the quality of green spaces, and ensure that people have better access to recreational facilities...

Not building a link road across green belt land will prevent the reduction in quality of green spaces. Any new green spaces should feel secure and paths lit.

### Q17b - How could we make more of Stockwood Vale or Maes Knoll as important environmental assets to the local area? Could...

Give the areas a more formal status to protect them from unnecessary or detrimental development, similar to that provided to Queen Charlton, which is already under review for expansion to further protect that area. Additionally the proposed proximity of t

### Q18a - How can we enhance routes for walking and cycling, for example to Keynsham and towards Bristol?

Provide more segregated or marked cycle lanes.

### Q18b - How can we encourage greater use of public transport?

Segregate public transport from the general road traffic as far as practical

### Q18d - What other ideas could be explored to achieve these objectives?

Congestion charges for City centres will encourage people to consider alternative means of transport to cars.

## General

### Any other comments?

In relation to Queen Charlton Conservation Area, Draft Character Appraisal and Management Plan, May 2017, Bath & North Somerset Council, Section 7.4 Control of New Development, how does the proposal to build an A4/A37 link road address contributing to the special character of conservation area such as Queen Charlton by introducing a new visual impact of long distance views from Queen Charlton, but also introducing increased background noise level to the area from vehicles using the new link road.

There is reference in the West of England JSP to current traffic "rat-running" on rural lanes, to presumably travel between the A4 and A37. Presumably this is via roads such as Staunton Lane, Stockwood Lane and Scotland Lane. The new A4/A37 link road may alleviate some of this traffic flow, but it will not solve this issue. Therefore, in the further development of any West of England JSP transport options, whether the A4/A37 link road becomes feasible or not, consideration should be given to introducing new pedestrian crossings in Stockwood, on Stockwood Lane in particular, to make it much safer to cross this road.

Local Plan 2016-2036, Issues & Options Consultation, Winter 2017, Bath & North Somerset Council Section 5.07 notes a transport study is currently underway that is exploring the nature of the proposed A4/A37 link road, but with no date of when the consultation on this matter will take place. This consultation and public engagement on any proposals is vital. Neither the JSP or B&NES Local Plan even recognise the most basic aspect of geography that this link road would need to overcome, and that is the relatively significant rise in height from Hicks Gate to the plateau of Stockwood, over a relatively short distance. This will have a significant impact on the route, engineering design, cost and viability of this link road.

The transport study and potential design options must also assess the impacts of, but not limited to:

building on green belt land, impact on wildlife and the environment, surface drainage of the areas with the removal of natural permeable fields, visual impact and how the road should be screened as far as practical from view for residents of Stockwood and Queen Charlton and the Maes Knoll, how the increased noise will be mitigated as far as practical, how increased light pollution will be addressed, what will be the impact on Air Quality?

In 2006 Atkins produced a Greater Bristol Strategic Transport Study Report. Section 6 included Highway measures including the South Bristol Ring Road which included a new link between the A4 and A37. Paragraph 6.46 states ‘‘Flows on the existing Avon Ring Road increase as a result of the scheme, particularly between Hicks Gate and the junction with the A420 at Warmley (see Figure 6.3). This puts a number of junctions on the ring road under pressure, and suggests that, in the absence of any other measures such as demand management, secondary measures would be required to increase junction capacity’’. The latest West of England JSP nor B&NES Local Plan appear to reference this potential impact or identify the need for works to increase junction capacity on the existing parts of the A4174 to the east of the city. How has this been factored into the overall design and cost of a new A4/A37 link road?

## Respondent

<b>Name</b>	Peter Morgan
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## Spatial Strategy Options

<b>Q5a - Have we considered all the issues?</b>
No
<b>Q5a - Please give reasons for your answer</b>
There is no requirement for places of worship in the plan. These also provide community centres.
<b>Q5b - What other evidence do you think we need to consider?</b>
Churches Together in Keynsham and Salford would be pleased to discuss possibilities for new places of worship in the plans.

## Strategic Development Location: North Keynsham

<b>Q6a What are your views on the vision and objectives?</b>
It needs to happen.
<b>Q6b What type of place should be created here?</b>
This is big enough to be a new community, a new church parish, with its own community centre. Churches can be a key part of that.

<b>Q10a - What should the housing mix comprise of?</b>
The plan needs to require a community centre including places of worship.

<b>Q12a - How can Avon Valley Wildlife &amp; Adventure Park be best integrated into the new development?</b>
This is a vital part of the local community and economy. Its Christmas Experience is one of the best in the UK. People make it an expensive but central part of their Christmas.

## Respondent

<b>Name</b>	David Morrison
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## Vision and Spatial Priorities

### Q1 - Have we identified the critical issues facing the District over the next 20 years?

No

### Q1 - Please give reasons for your answer

The question is a misnomer, the critical issues mentioned are what we face now. At the end of the next twenty it is hoped that the critical issues mentioned will have been addressed.

For these critical issues as written are the same as written at the beginning of last twenty year plan.. If taken in isolation there is not a changing population so much as a growing need for houses to accommodate fewer people in each. The changing population comes about by the necessity to supply dormitory development to support new "business" that is trying to be attracted to the area, an agreed necessity to ensure a successful future for everyone is applaudable. However, the existing population could be accommodated, particularly in the rural areas if just basic housing were affordable. The influx of new development to support new businesses must not forget to address the community need for housing in each of the previous Local Plans.

There is still a current scale of affordability based on housing use that reflects social society circumstances and local mobility. What is really needed and immediately is a large stock of good quality, well maintained housing for a reasonable and sustainable rent to cater for the existing, let alone future residents.

The critical issue is therefore that there is an inadequate supply of houses for rent, whether social or not. The critical issue is that without proper informed judgements the measured failure of the last twenty years will be repeated exponentially over the next twenty years unless there is a fundamental change in thought and direction.

It is the connectivity of the headlined critical issues that is really important. The bullet points below each heading and those of the next section where it numbers the spatial priorities. Give the impression that a completely silo'd approach will be taken in drawing up the not only the regional but also the local plan and the delivery of the same.

For instance having headlined Climate Change as a critical issue and then making a decision to put your strategic housing sites in a significant river valley makes no sense at all.

In transport and infrastructure there is an assumption to an increasing population, however over previous years of former strategic plan area, the population shrank by 2%. This over a period of time where house occupancy was 3 or 4 persons per unit, whereas today there are expected to be an average of just 1 or 2 per unit yet the same number of vehicle provision. Of course we need more housing but the critical reasoning behind why is not quite as it seems.

Have a robust rental sector makes for a good regional and local economic strategy and has financial benefits if it is run properly. A critical issue if it is not!

Therefore I believe the critical issue list is flawed in several areas.

Identifying that there is a projection in younger age groups needing housing and then recognising that the is below average earning in BANES suggests that the critical issue is that all housing to be

built in the District Council needs to be priced no higher than the affordability of wages rather than wages moving up to meeting housing prices. The critical issue here is that the Authority must recognise and apply its statutory powers in assuring that land values recognised in the HELAA are kept at a low value when it comes to cost purchase, or even compulsory purchase the land so the authority is in control of affordability from the start.

Need to include as critical, both the word ‘on’ as well as ‘to national and regional transport network’ The current capacity on arterial roads through the District clearly shows that some are not ‘fit for purpose’ to serve existing use and lead to unacceptable levels of risk. The physical safety of pedestrians and further the health of local communities are compromised by noxious gases from vehicle exhausts. The A37 at Pensford and at Temple Cloud are demonstrable examples of this critical issue. There opportunities through the recent HELAA to obtain the land that would provide for a much improved transport route around Clutton and Temple Cloud. Thus freeing up road space for more sustainable safe and healthy travel routes to schools, shops and workplaces.

**Q2: Are the suggested spatial priorities the right ones?**

Yes

**Q2 - Please give reasons for your answer**

They are a good start, however, there needs to be more positive action words on the Spatial Priority Page to give clear direction and authority. There needs to be words like ‘commitment to...’ at the start of each point; a clearer wording approach will remove ambiguity and provide clear responsibility and accountability. There needs to be a promise to joined up thinking in delivering real objective solution to the critical issues faced.

As it is implicit in answering question 11a and b, another critical issue is that of the increase in ‘greenhouse’ gas emissions having an effect on general global warming and its possible link with climate change.

**Spatial Strategy Options**

**Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?**

Option 2 - Focussed approach

**Q3 - Please give reasons for your answer**

Option 1- take all the BANES Strategic Development Housing quota from the Regional Plan and Build a new Technology Town with full community infrastructure in the Somer Valley. Improve the road networks to Bath and Bristol running a light rail and communication system alongside picking up villages along the routes and improve sustainable links to Bristol Airport.

Option 2 - Focussed Approach. One location would be best, two at most. With all the economy of scale for community benefit housing development would bring. The HELAA call for sites result offers a true opportunity to reduce the cost of housing, making it reasonable more affordable. Developers can not argue that the main expense of housing is the land (currently up to 70% of the cost of a house is claimed to be the land its sits upon). If BANES choose sites from the HELAA either they or prospective developers can calculate the total costs of development including all public domain infrastructure costs and this process will give a truer value to the development land than the current method of calculations.

Option 3 would merely make already unsustainable locations even more so.

**Q4 - Are there any other approaches/scenarios you think should be considered for accommodating non-strategic growth in B&NES**

Yes

**Q4 - Please give reasons for your answer**

If there is an opportunity for some larger development to go ahead in villages and it was considered among the local communities and authorities to be an acceptable way forward. Then a village, pair of villages or consortium could benefit from not only more sustainable employment, wider variety of housing options but also through Section 106 securing good quality:

- Public Open Space
- Affordable Housing
- Education
- Highways
- Village Centre Improvements

Of significant note in the HELAA, there seems to be a disproportionate amount of land offered in comparison to the size of the two villages (Clutton and Temple Cloud), put forward by landowners to answer the HELAA Call for Sites. This almost “windfall” of land area in my opinion provides a unique and several fold opportunity.

Firstly, the costs of the infrastructure can be borne by the land sale value rather than the Development of the houses. Currently in most housing developments 70% of the final cost of a house is the land it sits on. There is an opportunity to reverse this 70/30 so the benefit goes into quality of development, decent affordable housing and community infrastructure.

The Developers always argue that if they know full costs and expectations in advance of purchasing the land then they can deliver a good sustainable development. There is enough for everyone in Clutton and Temple Cloud if we work together from the start to identify what a future community needs and what they are entitled to.

It is in my opinion incumbent upon those representing communities to ensure that the community which they represent lives in a sustainable environment. That means meeting the needs of both the existing and future residential community. Without foresight and commitment to ensure future development adds value, any new development will surely make for an unsustainable existing community.

It is important to ensure fairness and reasonableness that every new housing unit contributes to the necessary strategic infrastructure as well as making its commitment to the levy contribution.

The land put forward as part of the HELAA is by nature deemed by the owner as surplus to their farming requirements, having little agricultural value. Whether this is true of all the land will presumably be subject to agricultural assessment in some way. The amount of land offered is extensive and gives an opportunity to provide both development at 35 units per ha and have a healthy surplus for community infrastructure and highways.

Even allowing for a reasonable amount being paid for the land there will also be enough to finance the much needed Temple Cloud/Clutton by-pass. In fact half the land needed for this forms part of the HELAA land, so if development went ahead, public contribution to compulsory purchase the land would not be necessary. If the Temple Cloud community and Cameley PC were also to look favourably at accepting strategic development in numbers to ensure community sustainability.



Although only indicative but relevant I feel, the figure of 700 houses is stated at the end of the arrow on the latest Draft Local Plan Consultation. If conceived, designed and developed properly this number of houses would be an asset not a burden to both Clutton and Temple Cloud.

Perhaps development is something to be embraced, not least because the land offered is located predominately on the edge of existing settlements and there is enough land to ensure development can sensitively blended into the landscape.

The Planning Inspectors report of June 2017 regarding the BANES Placemaking Plan stated the Clutton By-pass is a local rather than a strategic road scheme. Inferring that it would not go ahead unless locally funded. Well if enough houses were built that enabled contributions to be put forward, then I believe half the cost of the road scheme would be raised by allowing development.

The Regional Mayor department could be approached to match fund. There is likely to be support for this approach in the Mayoral Office as there are issues to be addressed in regards high pollution levels and the fact that the current A37 through Temple Cloud presents an unacceptable and potentially dangerous bottleneck.

The benefits of having the Clutton/Temple Cloud By-pass though need to be carefully weighed with the overall effects that will be placed on the existing communities, during and after houses are built.

**Q5a - Have we considered all the issues?**

No

**Q5a - Please give reasons for your answer**

The evidence base used to inform the Draft Local Plan covers many issues of interest and mitigation, but like the joint spatial strategy the approach to sustainable water management is not robust enough to give confidence that the areas of proposed strategic development have been risked assessed properly against their location suitability. It is reasonable to highlight that any major development adjacent to a major watercourse poses a significant risk. The interpretation of the local plan supporting evidence that a sustainable residential development can be implemented seems to me to be flawed. Given climate change and the knowledge that this development is proposed in an existing flood zone area I am surprised that development of the scale proposed is considered a sustainable option and believe that development of such scale will compromise those living and working on the development and the existing and possible future communities both up and downstream

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

Another site, at least 20-50mtrs above a major river level.

**Strategic Development Location: North Keynsham**

**Q6a What are your views on the vision and objectives?**

the vision for green/wetland environments will be maintenance intensive and costly. This needs to be shown clearly as a perhaps, if that what it is, acceptable risk in any plan.

**Q8a - What do you think of the proposed approach to the street network and wider connections?**

cycle/walkways need to be wide enough to accommodate both commuter cycling and recreational cycling.

**Q8b - Do you think it is important to create a healthy neighbourhood by encouraging walking and cycling?**

Yes

**Q8b - Please give reasons for your answer**

It is important to provide opportunity for safe recreation and movement by foot and cycle. There needs to be clear distinction to avoid ambiguity and conflict arising through use of shared space.

**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?**

Green corridors, ensure every hedge row has a 10 metre corridor and if the hedgerow has native trees within ensure a 30mtr wide corridor is allowed. Ideally have foot/cycle paths only following hedgerows and be lit if necessary on the outside edge. No dig operations under tree or hedge canopies. Do not allow development site compounds to be placed on areas that are or are to become green open spaces.

**Q10a - What should the housing mix comprise of?**

With most developments moving forward I believe 5 types. 33% authority owned for rent (protected tenure)/shared ownership; 30% low priced and starter homes for shared ownership/purchase; 20% medium priced housing for purchase; 12% higher priced housing fo

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

Over the next 20 years communication and transport technology will have moved forward so much that student university/college interface is unlikely to be as centralised around facilities as it is now. The importance for many subjects will be ensuring the

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

No

**Q11a - Please give reasons for your answer**

important to have aims: to achieve zero carbon development is very very difficult to achieve. Carbon neutral might be more achievable particularly as you have open space opportunities for instance that give off-setting opportunities like tree and hedge p

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

be very ambitious, start by working with the developers on their building practices, try to get agreement with them on using your own building control officers to oversee the development rather than the house building federation. Probably the largest release of CO2 on a construction site is from concrete setting. Are there ways to minimise CO2 release through choice of building materials?

**Strategic Development Location: Whitchurch**

**Q13a - What additional aspirations would you have here?**

specific provision for young people out of school hours

**Q13b - How can this vision be delivered?**

allow for adequate provision and resources to engage with the young people as the development progresses and after

**Q14b - Could some development take place in other areas outside of this broad development location?**

the further you take development from the newly developed public transport routes supporting strategic development, the more reliance on individual car use. If you are truly engineering sustainable environments, keep clear boundaries to the built environ

**Q15 - What should happen with the existing separation between Whitchurch village and Bristol**

<b>urban area? Should we:</b>
Continue to protect the Green Belt gap & keep the village separate?
<b>Q15 - Please give reasons for your answer</b>
15 - if the Council chooses to maintain a Green-Belt status to this land, there is potential to consider alternative uses of green belt land. Development is a possibility and could take the form of a more agrarian approach. A co-operative development base

<b>Q16a - How could the existing village centre be enhanced to cater for the needs of an increased population?</b>
consider greening available brown field sites rather than over development in already cramped living areas, these could be further integrated as new local generic transport hubs also.
<b>Q16b - How do we best integrate new local centre and facilities with the existing communities?</b>
engage actively in the area with existing residents, empower them to make real decisions, ensure there is opportunity for everyone to have their points at least listened too.

<b>Q17a - How can we improve the quality of green spaces, and ensure that people have better access to recreational facilities...</b>
set up and help constitute a Friends Group/Community Association/interest group, empower them, give them budgets to hold, resources to develop the community in the maintenance and management of any green asset, help and train where needed. The community w
<b>Q17b -How could we make more of Stockwood Vale or Maes Knoll as important environmental assets to the local area? Could...</b>
If you have ownership and/or custodianship then any piece of land could be of potential benefit.

<b>Q18a - How can we enhance routes for walking and cycling, for example to Keynsham and towards Bristol?</b>
make routes attractive, well maintained safe spaces. Not only provide capital funds to develop but ensure revenue funding is there to maintain in perpetuity.
<b>Q18b - How can we encourage greater use of public transport?</b>
Bring public transport into the heart of the development; ensure every dwelling is within 400 mtrs of a clearly marked public undercover transport stop with information boards and cycle parking facilities that can be accessed along a level, safe, attracti
<b>Q18c - How can we encourage people to be more active, more often?</b>
ensure there is 4.9Ha of land provided, of new designed and constructed to purpose accessible recreational, amenity and natural space per 1000 head of new population
<b>Q18d - What other ideas could be explored to achieve these objectives?</b>
ensure communities are involved and empowered to manage these spaces. Ensure good well funded community development and engagement is possible from design to delivery and beyond.

<b>Q19 - What sort of employment would be suitable as part of the new development and how much?</b>
To try and address the critical issues at the heart of the plan. Science and Technology seem to be the cornerstone of this region. It makes sense to provide opportunities through development to enhance this particular "cornerstone".

## General

<b>Any other comments?</b>
A country cannot grow its economy in the long term if its young people cannot grow their own futures in that country. Young people are not mentioned once in the Regional Spatial Plan, it is good

to see it is mentioned at least once in BANES Local planning documents.

## Respondent

<b>Name</b>	Sue & Alan Murtagh
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## Vision and Spatial Priorities

### Q1 - Have we identified the critical issues facing the District over the next 20 years?

Yes

### Q1 - Please give reasons for your answer

Whilst the importance of protecting and enhancing B&NES distinctive and world renown natural and built heritage is included under critical issues this should be embedded up front in the Vision. The special environments of the district underpin the current and future prosperity and wellbeing of the community. The extraordinary legacy cannot be achieved unless these are protected and managed in the long term.

### Q2: Are the suggested spatial priorities the right ones?

No

### Q2 - Please give reasons for your answer

The proposals for North Keynsham in the form and outline capacities shown in the JSP and detailed in the B&NES LP cannot be achieved in a sustainable way. A full and appropriate environmental capacity study needs to be undertaken including full appraisals of impacts on landscape, including the setting of the Cotswolds AONB, ecological assets along the river including the flight paths of horseshoe bats and the general amenity of the river Avon Corridor as a regionally significant green infrastructure corridor. Studies need to take into account the impacts from/on both sides of the river including communities in South Gloucestershire (Bitton, Swineford and Upton Cheyney)

### Q5a - Have we considered all the issues?

No

### Q5a - Please give reasons for your answer

Need to consider impacts of this major proposal on communities on the north side of the river including Bitton, Swineford and Upton Cheyney. Bitton village is closer to this development than settlements in B&NES. These communities also benefit from and share the River corridor as a natural green corridor. The proposed development intrudes too close to the river and almost abuts it near the marina.

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

Evidence of cooperation across boundary should be available- how have communities in S Glos been consulted?

Full Landscape impact appraisal and proposals for mitigation of detrimental impacts. Unlikely that views of this major site can be screened effectively from the Cotswolds AONB escarpment.

Assessments of likely noise and light pollution arising from the proposals on the tranquillity and ecology of the river corridor much of which is designated as an SNCI.

## Strategic Development Location: North Keynsham

**Q8b - Do you think it is important to create a healthy neighbourhood by encouraging walking and cycling?**

Yes

**Q8b - Please give reasons for your answer**

Fundamental to the existing and future community's health and well being.

**Q9a - What do you think of the proposed response to landscape impact, especially considering views from the Cotswolds?**

We agree that the site is significantly "visible from the Cotswolds and in the Landscape and Visual Assessment is considered to be part of a continuous swathe of open countryside from the Avon Valley towards the hills" However tree planting and low level

**Q9b - How can we improve the Green Infrastructure network through the site?**

Support the need for robust, multifunctional and connected green infrastructure network to underpin the new neighbourhood. Stronger Links to The River Avon Trail, Railway Path and other regional and local routes need to be made. Any land not required for built (ie non green belt) uses should remain in the green belt to ensure its openness and contribution to local green space for the local community well being.

**Q10a - What should the housing mix comprise of?**

Low rise, low density with a mix of styles, sizes and affordability. Not a suitable area for large student complexes.

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

No

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

Yes

**Q11a - Please give reasons for your answer**

This is a key part of sustainable development which should be combined with a multifunctional approach to green infrastructure such as green roofs, wildlife retention ponds etc.

**Q12a - How can Avon Valley Wildlife & Adventure Park be best integrated into the new development?**

This business in its current form is no longer a Country Wildlife Park compatible with this sensitive, green belt location and should not be perpetuated in any new development. The business is now focusing on intrusively noisy indoor and outdoor events su

**Q12b - What opportunities are there to minimise visual impact from the Cotswolds?**

See landscape comments to Q9a

**Q12c - Do you agree with the requirement to link with the Bristol to Bath cycle path?**

Yes

**Q12c - Please give reasons for your answer**

Please refer to this correctly as the multi user "Railway Path". It needs to be connected for all recreation users.

## Respondent

<b>Name</b>	Paul Nicholson
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## General

<b>Any other comments?</b>
<p>The new plan has no comments or action on the much required Saltford by-pass. The local school has been expanded to have a 2 form intake for every year. The traffic density is getting greater and greater each year. The delays for those trying to get either to Bristol or Bath are intolerable. For those of us living in Saltford the pollution levels in the summer are very high when the traffic density is even higher with the influx of visitors trying to get to park and ride sites - again for both cities. The spatial plan needs to urgently address a new by-pass for Saltford otherwise this cycle will be missed and it will be another 10 years before it is considered.</p>

## Respondent

<b>Name</b>	K Norton
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## General

<b>Any other comments?</b>
<p>The city of Bath appears to have been overlooked in this vision 2016-2036.          The transport links in, out and around Bath are in desperate need of improvement.          The vision needs to include:          The building of a new link road between A46 and A36.          The upgrading of the A46 from the motorway to the city of Bath.          A park and ride scheme to the east of Bath.          The introduction and improvement of existing local rail links around Bath.          Traffic and transport links are awful in, out and around Bath, they are holding the area back and need to be included in this vision.          Many thanks</p>

## Respondent

<b>Name</b>	Martin Palmer
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## Strategic Development Location: North Keynsham

<b>Q7a - What do you think of the proposed road alignment?</b>
<p>I do not consider enough thought has gone into the proposed route of the Hicks Gate A370 planned link Road.          Firstly why has the proposed route have to be so close to Stockwood and in particular Bifield Road. If there is a justified need for this link road why can it not be put in between stockwood and Stockwood Vale/Queen Charlton? Many more residents of Stockwood will be affected by this road than those of Stockwood Vale and Queen Charlton.          The proposed route is inaccurate as it does not indicate a true geographical representation of the land backing onto Bifield Road e.g., The Bristol City Council Allotments are not shown.</p>

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

Surely the route from Hicks Gate would take an unnecessary arduous route if it remains close to Stockwood. A much more sensible approach would be to put it nearer Stockwood Vale Golf Course, this would in my view reduce costs of road scheme.

**Q8b - Do you think it is important to create a healthy neighbourhood by encouraging walking and cycling?**

Yes

**Q8b - Please give reasons for your answer**

In order to protect existing residents who will live either side of this proposed road scheme lined routes of green open space with walking and cycling networks should be a pre-requisite in encouraging and creating a healthy neighbourhood.

### Strategic Development Location: Whitchurch

**Q13a - What additional aspirations would you have here?**

I am concerned about the plans for infrastructure to cater for all the additional people living in the 2500houses that are proposed. Will there be new schools, new Medical centres etc?

**Q13b - How can this vision be delivered?**

For a start more consultation time is definately required for people to view plans and proposals. There was only a 5 hour opportunity for local residents to attend the United Reform Church in Whitchurch on Thursday 30 November 2017, This is totally unacceptable.

**Q14a - Is this the right approach?**

No

**Q14a - Please give reasons for your answer**

Complete lack of consultation, local residents who attended this meeting knew more about the impact of these proposals than those representing the local authorities.

**Q14b - Could some development take place in other areas outside of this broad development location?**

Of course there should be other areas of development in Stockwood Vale and Queen Charlton or is the local authority trying to protect the chosen few?

**Q14c - What would be the benefits of this?**

Fairness of approach.

**Q15 - What should happen with the existing separation between Whitchurch village and Bristol urban area? Should we:**

Continue to protect the Green Belt gap & keep the village separate?

**Q15 - Please give reasons for your answer**

I am a firm believer that all Green Belt areas should be protected. The Green Belt land between Stockwood and Queen Charlton is alive with wild life such as Deer, Badgers, Bats and an array of birdlife, these must all be protected at all costs.

**Q17b -How could we make more of Stockwood Vale or Maes Knoll as important environmental assets to the local area? Could...**

A new link road running between Stockwood and Stockwood Vale will have a huge detrimental environmental impact. How can you create a new strategic parkland with increased vehicular noise, increased air pollution and Light Pollution at night?

**Q18b - How can we encourage greater use of public transport?**

Provide a reliable and cheap means of public transport and people will leave their cars at home. Consider tram systems.

**Q18c - How can we encourage people to be more active, more often?**

**General**

**Any other comments?**

JSP and BANES Local Plan Comments

In relation to Queen Charlton Conservation Area, Draft Character Appraisal and Management Plan, May 2017, Bath & North Somerset Council, Section 7.4 Control of New Development, how does the proposal to build an A4/A37 link road address contributing to the special character of conservation area such as Queen Charlton by introducing a new visual impact of long distance views from Queen Charlton, but also introducing increased background noise level to the area from vehicles using the new link road.

There is reference in the West of England JSP to current traffic ‘rat-running’ on rural lanes, to presumably travel between the A4 and A37. Presumably this is via roads such as Staunton Lane, Stockwood Lane and Scotland Lane. The new A4/A37 link road may alleviate some of this traffic flow, but it will not solve this issue. Therefore in the further development of any West of England JSP transport options, whether the A4/A37 link road becomes feasible or not, consideration should be given to introducing new pedestrian crossings in Stockwood, on Stockwood Lane in particular, to make it much safer to cross this road.

Local Plan 2016-2036, Issues & Options Consultation, Winter 2017, Bath & North Somerset Council Section 5.07 notes a transport study is currently underway that is exploring the nature of the proposed A4/A37 link road, but with no date of when the consultation on this matter will take place. This consultation and public engagement on any proposals is vital. Neither the JSP or B&NES Local Plan even recognise the most basic aspect of geography that this link road would need to overcome, and that is the relatively significant rise in height from Hicks Gate to the plateau of Stockwood, over a relatively short distance. This will have a significant impact on the route, engineering design, cost and viability of this link road.

The transport study and potential design options must also assess the impacts of, but not limited to: building on green belt land, impact on wildlife and the environment, surface drainage of the areas with the removal of natural permeable fields, visual impact and how the road should be screened as far as practical from view for residents of Stockwood and Queen Charlton and the Maes Knoll, how the increased noise will be mitigated as far as practical, how increased light pollution will be addressed, what will be the impact on Air Quality?

In 2006 Atkins produced a Greater Bristol Strategic Transport Study Report. Section 6 included Highway measures including the South Bristol Ring Road which included a new link between the A4 and A37. Paragraph 6.46 states ‘Flows on the existing Avon Ring Road increase as a result of the scheme, particularly between Hicks Gate and the junction with the A420 at Warmley (see Figure 6.3). This puts a number of junctions on the ring road under pressure, and suggests that, in the absence of any other measures such as demand management, secondary measures would be required to increase junction capacity’. The latest West of England JSP nor B&NES Local Plan appear to reference this potential impact or identify the need for works to increase junction capacity on the existing parts of the A4174 to the east of the city. How has this been factored in?



## Respondent

<b>Name</b>	Hilary Paterson
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## Housing Needs and Student Accommodation

**Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...**

Option 3

## General

**Any other comments?**

Due to the already saturated level of PBSA and HMOs (for students) in the local area, I firmly believe that any further student accommodation should now be provided by the universities on their own campuses. After all the PBSA that has taken over the area in the last couple of years, it is now time for local residents and businesses to be made a priority.

## Respondent

<b>Name</b>	David Paul
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## Strategic Development Location: Whitchurch

**Q16a - How could the existing village centre be enhanced to cater for the needs of an increased population?**

Agree with the proposals

**Q16b - How do we best integrate new local centre and facilities with the existing communities?**

Gradual intergration and special events. Communicating the new facilities has been lacking in the past and needs improving by the local authorities.

**Q17a - How can we improve the quality of green spaces, and ensure that people have better access to recreational facilities...**

Keep the current spaces with better access, picnic areas, keeping the areas clean and healthy.

**Q17b -How could we make more of Stockwood Vale or Maes Knoll as important environmental assets to the local area? Could...**

They are both vital to preserve and could provide economic (financial and social) assets in the future. Maes Knoll contains more history than most people are aware of.

**Q18a - How can we enhance routes for walking and cycling, for example to Keynsham and towards Bristol?**

The cycle track (Whitchurch into Bristol) could be widened

**Q18b - How can we encourage greater use of public transport?**

Make it cheaper

**Q18c - How can we encourage people to be more active, more often?**

Offer free courses to all classes of society, guided walks around the countryside and Maes Knoll.

**Q18d - What other ideas could be explored to achieve these objectives?**

Use the proposed social facilities, eg new church halls, hospitals, doctors surgeries, etc

**Q19 - What sort of employment would be suitable as part of the new development and how much?**

I see employment increasing for the local area, eg shops and services. I cannot see any manufacturing opportunities. Low paid and part time work only. The shortage of skilled labour opportunities should be investigated.

**General**

**Any other comments?**

No more dual carriageways. We have enough large roads in the Whitchurch area. They cause traffic and noise pollution. They spoil are living conditions. The new proposals are a threat to Meas Knoll and Stockwood Vale. They cost a fortune to build and even more to maintain over the years. Use the current road structures! These types of roads have a reputation for causing more traffic congestion than before. Moving the problem elsewhere, via the "funnel" effect.

**Respondent**

<b>Name</b>	Beth Pearce
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**Housing Needs and Student Accommodation**

**Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...**

Option 3 as there is too much high density student accommodation being put in ridiculous areas where the infrastructure can't cope. This is pushing residents out and making student hmo ghettos. It's about time the campus housed it's own students instead of making ridiculous profits.

**Q21b - Are there any other options?**

No

**Respondent**

<b>Name</b>	Steve Robbins
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**Housing Needs and Student Accommodation**

**Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...**

Option 3

**Respondent**

<b>Name</b>	Emily Rose
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**Q13a - What additional aspirations would you have here?**

I strongly disagree with this vision and development.

<b>Q13b - How can this vision be delivered?</b>
It is wrong to deliver this vision and damaging to the area.
<b>Q14a - Is this the right approach?</b>
No
<b>Q14a - Please give reasons for your answer</b>
Infrastructure is key to any development, I would like to see how existing and under utilised infrastructure (mainly roads) can be built around. Opening a similar housing estate with its own M4 motorway junction between j18 and j19 (the slip roads already
<b>Q14b - Could some development take place in other areas outside of this broad development location?</b>
No - why would you wish to encroach on important conservation areas. They are protected for a reason.
<b>Q14c - What would be the benefits of this?</b>
Nothing would benefit, I fail to see any gains.
<b>Q14d - What evidence is available to support development in these areas?</b>
None

<b>Q15 - What should happen with the existing separation between Whitchurch village and Bristol urban area? Should we:</b>
Continue to protect the Green Belt gap & keep the village separate?
<b>Q15 - Please give reasons for your answer</b>
Protect the green belt, please.

## Respondent

<b>Name</b>	Alex Rose-Parfitt
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## Strategic Development Location: Whitchurch

<b>Q13a - What additional aspirations would you have here?</b>
Is strongly disagree with this plan.
<b>Q13b - How can this vision be delivered?</b>
I disagree with this vision.

<b>Q14a - Is this the right approach?</b>
No
<b>Q14a - Please give reasons for your answer</b>
Further expansion of these areas is not the right approach. There are more suitable areas of land in BANES, with better link to existing infrastructure (including north of Wick towards the M4).
<b>Q14b - Could some development take place in other areas outside of this broad development location?</b>
No - it is important to protect and respect our conservation areas and beautiful countryside. Why on earth would the council even consider this? We need to consider how we maintain these areas for future generations.
<b>Q14c - What would be the benefits of this?</b>
None - it would further damage these protected conservation areas.
<b>Q14d - What evidence is available to support development in these areas?</b>

None

**Q15 - What should happen with the existing separation between Whitchurch village and Bristol urban area? Should we:**

Continue to protect the Green Belt gap & keep the village separate?

**Q15 - Please give reasons for your answer**

The green belt needs to be protected

## Respondent

<b>Name</b>	Mrs Diane Shearn
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## Spatial Strategy Options

**Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?**

Option 2 - Focussed approach

**Q3 - Please give reasons for your answer**

I have witnessed my iconic town reduced to a student town with almost every available piece of land being rubber stamped for university accomodation. Those in power of planning seem to be inconiderat of the type of flats approved IE The Riverbank which does not blend in with the city & can be seen from all poits in around & above Bath.

Mulberry Park near to my heart & home. Already the road approaching has had numerous near accidents as clearly the inphastruture hadnt been thought out.

**Q4 - Are there any other approaches/scenarios you think should be considered for accommodating non-strategic growth in B&NES**

Yes

**Q4 - Please give reasons for your answer**

Due no doubt to the student accomodation by where they do not pay rates, WE as residents do, & we resent the detereration of our town. Unkempt verges etc, not enough toilets (if any ) for your lucrative tourist industry. We have no police station & never any police to be seen, despite much crime on the streets.

Beggars, many abusive & threatening, & unlike other towns who are proud of their invironment, no one moves them on.

Lets focas on the generous tourists. Few small coinoc shops as per our previos reputation, just chan stores, charity shops...and...empty shops due to the greed og=f our horendously high council tax. mASSive council tax ...and...parking fees & pfines for driving through bus gates. "What bus gates" say most tourists. Its verging on decept to have such dectere signs that someone negicaiting out=r confusing road system, are easy targets for theBANES coffers. each time I am in twon , almost daily, I invarably save at laest 10 drivers from haertache & expense by stopping them drining through wjhat appaers to be an average road but what is out toi get the unsuspecting. I have haerd so many folk say that they would "never return"

So...no police yet armies of traffic wardens, pallners who seek to build more & more houses onin pour little space. Wht=y has there been an ex[olsion of birth in the lat 14 years making

## Respondent

<b>Name</b>	Katherine Sheil
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### Strategic Development Location: Whitchurch

<b>Q13a - What additional aspirations would you have here?</b>
I feel very strongly that Whitchurch Village should remain a village and that our community should stay the size of a village community. And that the number of vehicles going through the village do not go up
<b>Q13b - How can this vision be delivered?</b>
By keeping the village at the size it is

<b>Q14a - Is this the right approach?</b>
No
<b>Q14a - Please give reasons for your answer</b>
The village will no longer be a village
<b>Q14b - Could some development take place in other areas outside of this broad development location?</b>
None of the above. Transport will still be a big issue. We don't have the infrastructure Brislington/Hicksgate would be more suitable as it is near a Park and Ride and railway station.
<b>Q14c - What would be the benefits of this?</b>
Already has good infrastructure
<b>Q14d - What evidence is available to support development in these areas?</b>
Already has good infrastructure - park and ride, railway station

<b>Q15 - What should happen with the existing separation between Whitchurch village and Bristol urban area? Should we:</b>
Continue to protect the Green Belt gap & keep the village separate?
<b>Q15 - Please give reasons for your answer</b>
There are brown belt areas that can be used in Bristol. Arena next to temple meads Old Lloydes bank Norwich union building

<b>Q16a - How could the existing village centre be enhanced to cater for the needs of an increased population?</b>
I don't believe it can be enhanced as the village will no longer be a village with an increased population
<b>Q16b - How do we best integrate new local centre and facilities with the existing communities?</b>
I don't think this is possible as our village would become town

<b>Q17a - How can we improve the quality of green spaces, and ensure that people have better access to recreational facilities...</b>
the present green space has footpaths and leisure clubs

<b>Q18a - How can we enhance routes for walking and cycling, for example to Keynsham and towards Bristol?</b>
widening the roads or making cyclepaths.

## Respondent

<b>Name</b>	Anton Simmons
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## Housing Needs and Student Accommodation

<b>Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...</b>
Option 3

## General

<b>Any other comments?</b>
Students should be accomodated on campus and a few off-campus PBSA units. This should release family houses which have been allowed to become HMO investment opportunities. The current system has over-burdened Oldfield Park with students who pay no council tax but create considerable amounts of refuse. University growth should be contrained within University ability to accomodate on campus and should never have been allowed to take over large parts of the city, degrading areas and contributing to house price inflation. Tackling the current mis-guided approach to university expansion at the expensive of residents by re-locating students on campus will also improve traffic congestion by reducing buses between Universities and student 'domitory' area of Oldfield Park.

## Respondent

<b>Name</b>	Tony Solon
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## Housing Needs and Student Accommodation

<b>Q21a - Which of the options for responding to the universities' growth and demand for student accomodation should be the...</b>
#3. PBSA should only be allowed on campus, with policies to refuse PBSA elsewhere

## Respondent

<b>Name</b>	Nigel Sommerfield
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## Spatial Strategy Options

<b>Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?</b>
Option 1 - Continue the existing hierarchical approach
<b>Q3 - Please give reasons for your answer</b>
Because development is directed to the most sustainable locations outside the green belt where access to employment opportunities, facilities and services as well as to public transport is best. Development in the most rural areas should be limited to those which enhance the built and natural environment, re use redundant brown field sites or to address a specific local need especially for affordable housing for people with local connections or who are employed in local business or

agriculture or essential local services.

I would like to specifically query why East Harptree is designated as a settlement with 'moderate' access to key services and facilities when it is clearly worse off than Ubley and Compton Martin (Very Limited) and West Harptree (limited access). Apart from the few houses in Townsend it is entirely clustered around a narrow unclassified road. The school and pre school are full to capacity, the Pub is closed down and the community shop is only open for a few hours each day. Public transport availability is no better than any of the other nearby villages except Hinton Blewett. West Harptree (classified as worse off than EH) is predominantly accessed by the A368, has a doctors surgery, a functioning Pub and a great shop. The classification of East Harpree should be reconsidered as I cannot see how it could possibly meet the "moderate range' criteria in comparison with the other villages.

**Q4 - Are there any other approaches/scenarios you think should be considered for accommodating non-strategic growth in B&NES**

Yes

**Q4 - Please give reasons for your answer**

Develop a means of identifying empty properties and levy a council tax penalty on the owners if no valid reason. Investigate the reasons for unimplemented new build planning permissions and take appropriate actions to speed them up. Measures introduced to prevent 'land banking' by developers and speculators.

These measures required to reduce pressure to build on the green belt.

**Respondent**

<b>Name</b>	Jenny Smith
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**Vision and Spatial Priorities**

**Q1 - Have we identified the critical issues facing the District over the next 20 years?**

No

**Q1 - Please give reasons for your answer**

As a Resident who's house looks out on to the Green Belt Surrounding Bristol Stockwood Boundary you have failed to consult with myself and my neighbours on the Ring Road that is proposed. Our concern is for the wild life that visits our gardens daily, and for the pollution that such a road would contribute to our Environment. We have received no consultation letter and only found out about this consultation by default.

**Q2: Are the suggested spatial priorities the right ones?**

No

**Q2 - Please give reasons for your answer**

My husband and I have always agreed that there was a possibility for new Housing to be built in the fields behind our homes, what we do object to is the fact that there is to be an extension of the ring road, without any indication that there is to be an environmental barrier between this road and our properties. Why have we not received any consultation documents at all? Who and where has consultation taken place? Have our local councillors been involved, if so why am I having to raise the issue with them, without any exhibition or consultation in Stockwood Library? I therefore wish to

raise a formal complaint, that residents who will be most effected by this road, such as those in Burfoote Gardens, have received no notification what so ever.

### Strategic Development Location: Whitchurch

#### Q13a - What additional aspirations would you have here?

If the Ring road goes ahead, we need a natural Environmental Barrier between ourselves and this road, comprising of trees and possibly earth mounds in order to mitigate the noise, environmental pollution and enable at least some of the wild life in this area to survive. Currently we have a wide variety of birds, deer, sparrow hawks has any audit been made and suggestions put forward to protect their natural habitat??

#### Q13b - How can this vision be delivered?

Only if consideration is taken for residents who will be immediately effected by the ring road, and the natural flora and fauna in the fields behind us.

#### Q14a - Is this the right approach?

No

#### Q14a - Please give reasons for your answer

Consultation has not taken place with residents like myself who will be considerable effected by these proposals.

#### Q15 - What should happen with the existing separation between Whitchurch village and Bristol urban area? Should we:

Allow some development, but keep a smaller gap?

#### Q15 - Please give reasons for your answer

and between the City and the immediate its green belt.

### General

#### Any other comments?

we the residents of Stockwood have not been briefed on the impact that this road and the increased housing will have on our Environment, Health Centre, Schools and the fact that the land where the proposals are to take place is land where rain is absorbed i.e. effectively flood planes, which when built on will effect the adjacent Stockwood area by causing flooding. There is also the matter of the Common on Staunton Lane, what is to happen to that? Clearly it is an ancient Common that must have articles of protection on it. I have lived here since 1972, which means I know a lot of the history of this area. Clearly this is a consultation that is not accessible to many already living on the other side of the Bristol boundary. Roughshod comes to mind to sum this up.

### Respondent

<b>Name</b>	Cllr Shaun Stephenson-McGall
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### Vision and Spatial Priorities

#### Q1 - Have we identified the critical issues facing the District over the next 20 years?

Yes



**Q2: Are the suggested spatial priorities the right ones?**

Yes

### Spatial Strategy Options

**Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?**

Option 3 - Dispersed approach

**Q3 - Please give reasons for your answer**

Villages need to be sustainable and provide accommodation for future generations including young families

**Q4 - Are there any other approaches/scenarios you think should be considered for accommodating non-strategic growth in B&NES**

No

**Q5a - Have we considered all the issues?**

Yes

### Strategic Development Location: North Keynsham

**Q8b - Do you think it is important to create a healthy neighbourhood by encouraging walking and cycling?**

Yes

**Q8b - Please give reasons for your answer**

Reducing Car dependence is important to combat both climate change and the unhealthy life styles and an aging population.

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

I'm not sure that students attending either of Bath's Universities would want to live in Halls in Keynsham.

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

Yes

**Q11a - Please give reasons for your answer**

Combating climate change is the No. one threat to this country and the planet.

**Q12c - Do you agree with the requirement to link with the Bristol to Bath cycle path?**

Yes

### Housing Needs and Student Accommodation

**Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...**

Option 4 is the nearest to my view.

**Q21b - Are there any other options?**

But additionally no new academic buildings and capacity should be allowed in the city until both universities house more of their current students in PBSA on their current campuses. The city is full and any future housing development should be prioritised for long term residents not temporary student residents.

## General

### Any other comments?

More emphasis on sustainability needed to be made and for Example all new housing being granted planning permission should be required to be built with bicycle storage, electric car charging points, triple glazing, appropriate recycling storage facilities, and out of the most sustainable materials.

## Respondent

<b>Name</b>	Alison Streatfeild-James N/A
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## Strategic Development Location: Whitchurch

### Q13a - What additional aspirations would you have here?

Retaining an important piece of open countryside, which is very much appreciated and enjoyed by local people and visitors from the nearby urban locations and not congesting travel routes that are already choked and very poorly supplied with public transport.

### Q13b - How can this vision be delivered?

By not landing this area with a huge proportion of the housing development said to be needed

### Q14a - Is this the right approach?

No

### Q14a - Please give reasons for your answer

There are no jobs in this area. There are no useful public transport links in this area. The open greenbelt in this location is very important and should be retained. By building a large number of houses and a local centre you will spoil the open countryside

### Q14b - Could some development take place in other areas outside of this broad development location?

No. Stockwood vale is an important open green area, planted for woodland some years ago and also has a golf club which offers used and enjoyed open green space for local people.  
No, Queen Charlton is a rare conservation village in a rare green corner bet

### Q14c - What would be the benefits of this?

No benefit to spoiling any of this area with development and traffic congestion

### Q14d - What evidence is available to support development in these areas?

None

### Q15 - What should happen with the existing separation between Whitchurch village and Bristol urban area? Should we:

Continue to protect the Green Belt gap & keep the village separate?

### Q15 - Please give reasons for your answer

Important green belt open area to preserve the hard urban edge of Bristol and preventing the spillage of development further into countryside which is much used and enjoyed by local people and visitors.

**Q16a - How could the existing village centre be enhanced to cater for the needs of an increased population?**

Not qualified to comment as do not live in Whitchurch village

**Q16b - How do we best integrate new local centre and facilities with the existing communities?**

Do not build a new local centre and facilities in this location at all, it is not the appropriate place to put such a development

**Q17a - How can we improve the quality of green spaces, and ensure that people have better access to recreational facilities...**

Leave the green belt spaces that are there - there are footpaths which are well used and views over this landscape from many view points which are important to the people who already live here and to many visitors who will be unaware of this consultation

**Q17b -How could we make more of Stockwood Vale or Maes Knoll as important environmental assets to the local area? Could...**

No - do not urbanise wild or farmed green belt with a park - leave it as it is or the whole area will become an urban space, defined by Bristol and not the natural green open area it is now.

**Q18a - How can we enhance routes for walking and cycling, for example to Keynsham and towards Bristol?**

If you increase the number of houses the roads and lanes will become too unsafe to use for cycling and walking or horse riding (and many local people have horses in this area, they are not wealthy horse owners they are ordinary local people). We need to k

**Q18b - How can we encourage greater use of public transport?**

Better train service from Keynsham, most local people would take a train that takes under 10 mins into the middle of Bath and Bristol if there was a more regular and more reliable service and a useful regular bus service to take you to other parts of Bath

**Q18c - How can we encourage people to be more active, more often?**

Leave the countryside as it is - those who want to be active walk their dogs. Those who do not will not respond to the urbanisation of greenbelt land.

**Q18d - What other ideas could be explored to achieve these objectives?**

Think again about the local train service from Keynsham, as above.

**Q19 - What sort of employment would be suitable as part of the new development and how much?**

None - there should be no new development here. It is not a suitable location for new jobs - the jobs and new jobs will be near the port or in industrial or middle of town locations in Bath and Bristol which are not easily accessible from this area.

## General

**Any other comments?**

Please, please do not change the greenbelt and ruin the open countryside between Keynsham and Whitchurch. It is well used and much enjoyed by a huge range of local people. The proposed plan for massive housing development will spoil this area for ever and increase the burden on a traffic system which is already not working.

## Respondent

<b>Name</b>	Amelia Streatfeild-James
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### Strategic Development Location: Whitchurch

<b>Q13a - What additional aspirations would you have here?</b>
Retaining an important stretch of open countryside that both locals and visitors enjoy as well as not congesting the traffic into Bristol and Bath more than it already is.
<b>Q13b - How can this vision be delivered?</b>
By not building a new housing development in this area.

<b>Q14a - Is this the right approach?</b>
No
<b>Q14a - Please give reasons for your answer</b>
The open green belt is very important for the natural countryside between Bristol and Bath. There are no jobs in this area and no useful or frequent modes of public transport in this area. The congestion running along the A37 is already lengthy enough wit
<b>Q14b - Could some development take place in other areas outside of this broad development location?</b>
No. Queen Charlton is an old, historic village with protected and preserved houses. Building up around this area will spoil the charm of this village and the tranquility of the surrounding countryside which the locals living here value greatly. The prese
<b>Q14c - What would be the benefits of this?</b>
There is no benefit of spoiling this area with new houses and increased traffic.
<b>Q14d - What evidence is available to support development in these areas?</b>
There is none.

<b>Q15 - What should happen with the existing separation between Whitchurch village and Bristol urban area? Should we:</b>
Continue to protect the Green Belt gap & keep the village separate?
<b>Q15 - Please give reasons for your answer</b>
It's an important green belt area that needs to be preserved and kept separate from urbanisation. It would also prevent further spillage into the countryside as a barrier between city and country.

<b>Q16a - How could the existing village centre be enhanced to cater for the needs of an increased population?</b>
I don't live in Whitchurch so don't feel I can answer this question
<b>Q16b - How do we best integrate new local centre and facilities with the existing communities?</b>
Don't. A new local centre and facilities isn't needed in this area.

<b>Q17a - How can we improve the quality of green spaces, and ensure that people have better access to recreational facilities...</b>
There are already well used foot paths in this area- there is no need to improve the quality of nature, it is already enjoyed by locals and visitors alike, visitors who may not be aware of the proposals and would be upset to see anything happen to this op
<b>Q17b -How could we make more of Stockwood Vale or Maes Knoll as important environmental assets to the local area? Could...</b>
They don't need a new parkland. There is no need to urbanise wild or farmed areas with a park - if you don't leave it as it is it will soon become a part of Bristol and no longer defined by the open

country it is now.

**Q18a - How can we enhance routes for walking and cycling, for example to Keynsham and towards Bristol?**

If there are increased numbers of houses the lanes will soon become unsafe for pedestrians, cyclists and horse riders of which there are many in this area. All these locals enjoy the land as it is now, with increased traffic running through these areas it

**Q18b - How can we encourage greater use of public transport?**

There is no good mode of public transport in this area. Trains from Keynsham are infrequent and unreliable. And there are no good bus services. A good bus service would be useful but would take a long time with the traffic conditions. A good link between

**Q18c - How can we encourage people to be more active, more often?**

The people who live around this area are already active, walking, cycling, horse riding. Focusing on getting more active in the centre of cities would be more useful but building in this area is not going to solve that.

**Q19 - What sort of employment would be suitable as part of the new development and how much?**

No employment - this is not an area to try to create jobs. Building around already industrial areas, ports, etc. would be a better way to create more jobs and have minimal impact on traffic and the countryside.

**General**

**Any other comments?**

Please, do not build new houses in this area. The countryside is very important to us as is keeping the natural environment of this area of Britain in tact.

**Respondent**

<b>Name</b>	David Streatfeild-James
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**Strategic Development Location: Whitchurch**

**Q13a - What additional aspirations would you have here?**

The difficulty with this question is it takes the vision as read, and simply asks for additional aspirations. However, (first) the vision is so general as to be meaningless in this context: every development of this scale and importance should be sustainable, people centred, attractive, residentially led, etc, so this "vision" tells us nothing of any value. Secondly, this point is important here because what is described is essentially undeliverable in this location - the great majority of the residents will work in Bristol with the associated travel issues (I understand that the proposal includes the construction of improved travel links - se further below), and the area will be no more than a further commuter area. Experience of other developments around Bristol over many years give a good understanding of what the result will be like: look at Bradley Stoke as an indication of the wasteland which will result. Thus what is being proposed is a new small town in the present Green Belt, but as an adjunct to Bristol: as such, it will never be what is described in the vision.

The aspirations which I would propose would be those which can sensibly be delivered, and development of this number of houses cannot take place in the manner described in this location.

**Q13b - How can this vision be delivered?**

It cannot be, in this location.

The answers below are given on the basis that this scheme is fundamentally misconceived.

**Q14a - Is this the right approach?**

Yes

**Q14a - Please give reasons for your answer**

There should not be development here of this nature and scale for the reasons already set out; but if it is the case that it is to go ahead it must protect the local physical, heritage and rural assets as far as possible. I do not understand the word "re

**Q14b - Could some development take place in other areas outside of this broad development location?**

No. The dangers of the development have already been explained, but to trespass upon important heritage sites like Maes Knoll and Queen Charlton would be unpardonable. Once destroyed these can never be recreated. Villages and heritage all around Bristo

**Q14c - What would be the benefits of this?**

None: there would only be disbenefits.

**Q14d - What evidence is available to support development in these areas?**

None. The predominant employment in this area depends either upon commuting (see above, as to why the vision is not sensible or realisable) or agriculture (which on any view is going to be damaged and reduced by these proposals)

**Q15 - What should happen with the existing separation between Whitchurch village and Bristol urban area? Should we:**

Continue to protect the Green Belt gap & keep the village separate?

**Q15 - Please give reasons for your answer**

The difficulty with this question/answer is that inevitably there are trade offs, and three alternatives do not do justice to them.

Everyone accepts the need for additional housing and development, and one has to try to balance the conflicting intere

**Q16a - How could the existing village centre be enhanced to cater for the needs of an increased population?**

It cannot be "enhanced" in any meaningful way - on any sensible basis the plan involves the destruction of what is left of the village centre and/or its complete relocation.

**Q16b - How do we best integrate new local centre and facilities with the existing communities?**

You cannot and it is idle to suppose you can. Whitchurch is a small village on a major road, but with its own current centre and community; the new development will dwarf it many times over, and provide an entirely new centre. It is daft to talk of inte

**Q17a - How can we improve the quality of green spaces, and ensure that people have better access to recreational facilities...**

By not destroying them, is the easy answer. This is yet another silly question, I'm afraid: biodiversity should of course be important, to take one of the examples mentioned, but it is far from obvious to me how the biodiversity currently supported in th

**Q17b -How could we make more of Stockwood Vale or Maes Knoll as important environmental assets to the local area? Could...**

I am very cautious about "Strategic Parkland". There is already a network of footpaths for walking,

and the cycling around the lanes and through the villages is considerable. No doubt further tree planting or similar could be carried out (many elms were

**Q18a - How can we enhance routes for walking and cycling, for example to Keynsham and towards Bristol?**

For recreational purposes, this needs relatively little work - see above.

I understand that the real point of the question is to address travel for employment etc. One point I have already made is that this development will not provide significant amo

**Q18b - How can we encourage greater use of public transport?**

An excellent idea, but one which will take considerable investment over time: the problem is (as with other areas in Bristol) a chronic lack of infrastructure.

Trains: Keynsham station will not be easily accessible from this proposed site, and does not

**Q18c - How can we encourage people to be more active, more often?**

I don't know: this is not a problem for this development alone, but appears to be a national issue

**Q18d - What other ideas could be explored to achieve these objectives?**

**Q19 - What sort of employment would be suitable as part of the new development and how much?**

I find it difficult to know of any sensible employment for this site. Keynsham has lost local employment - the Frys factory, for example - and it seems unlikely to me that there is any suitable large employer. Small employment opportunities will not rea

## Development Precedents

**Q20a - What are the qualities of the places on pages 24 to 27 that could be used in either of the new development areas?**

This is an answer to 20a to 20c:

The precedents all have pros and cons in their appropriate settings - which are predominantly urban and not rural. None would suit the proposed development at Whitchurch.

**Q20b - What aspects should we seek to avoid?**

## Respondent

<b>Name</b>	Elizabeth Streatfeild-James
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## Vision and Spatial Priorities

**Q1 - Have we identified the critical issues facing the District over the next 20 years?**

Yes

**Q1 - Please give reasons for your answer**

You have not considered other key issues such as protecting the green belt and local communities from over expansion and traffic congestion.

**Q2: Are the suggested spatial priorities the right ones?**

No

**Q2 - Please give reasons for your answer**

They are encroaching on the green belt which is a crucial area that needs to be protected outside Bristol which many people enjoy and use for relaxation.

**Strategic Development Location: North Keynsham**

**Q7a - What do you think of the proposed road alignment?**

What Bristol and Bath and north east Somerset really needs is better public transport. Building more roads for more access will not solve problems of congestion, public transport to reduce the number of people on the road is the best way to improve links to the big cities.

**Q8b - Do you think it is important to create a healthy neighbourhood by encouraging walking and cycling?**

Yes

**Q8b - Please give reasons for your answer**

Encouraging walking within cities and cycling between networks is crucial, however widening roads to accommodate people walking in and out of countryside towns is not a successful answer to any problem.

**Q9a - What do you think of the proposed response to landscape impact, especially considering views from the Cotswolds?**

The Cotswolds are used as an escape for many people and a way to get out of the city, by building lots of housing near them and within view of them would ruin the experience and the tranquil nature of them as it would increase the traffic flow putting loc

**Q9b - How can we improve the Green Infrastructure network through the site?**

Don't build on the green belt, it is protected for a reason to keep the essence of British green and pleasant lands alive.

**Q10a - What should the housing mix comprise of?**

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

Students want to live in cities and near their accommodation, they do not want to live in the outer city areas of newly developed areas.

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

Yes

**Q11a - Please give reasons for your answer**

I believe that any future development should aim to be Zero Carbon development as the local areas surrounding Bristol and Bath are delicate areas that need to be preserved.

**Strategic Development Location: Whitchurch**

**Q13a - What additional aspirations would you have here?**

Retaining an area of open countryside which the local residents enjoy and use frequently. The lack of traffic congestion on the roads and noise and light pollution makes the areas you are considering developing enjoyable areas, this development would ruin the special feeling that these places have.

**Q13b - How can this vision be delivered?**

By not building an enormous amount of housing or urban area on the areas that need to be preserved.



<b>Q14a - Is this the right approach?</b>
No
<b>Q14a - Please give reasons for your answer</b>
There is no regular or useful public transport in the area and the open greenbelt is very important and needs to be protected. There are also no jobs in the area, by developing this area all you would achieve is increasing the burden on the roads and the
<b>Q14b - Could some development take place in other areas outside of this broad development location?</b>
Building development within the area of Queen Charlton would be an immensely bad idea, it is a protected area and one of historic importance, there are many listed and beautiful buildings there (including a Norman Arch and grade 2 listed Manor house), it
<b>Q14c - What would be the benefits of this?</b>
None, it would ruin the area with traffic congestion and development.
<b>Q14d - What evidence is available to support development in these areas?</b>
None.

<b>Q15 - What should happen with the existing separation between Whitchurch village and Bristol urban area? Should we:</b>
Continue to protect the Green Belt gap & keep the village separate?
<b>Q15 - Please give reasons for your answer</b>
Important green belt open area to preserve the hard urban edge of Bristol and preventing the spillage of development further into countryside which is much used and enjoyed by local people and visitors.

<b>Q16a - How could the existing village centre be enhanced to cater for the needs of an increased population?</b>
Not qualified to comment as I do not live in Whitchurch centre.
<b>Q16b - How do we best integrate new local centre and facilities with the existing communities?</b>
Do not build a new local centre and facilities in this area at all, it is not the appropriate place for this kind of development.

<b>Q17a - How can we improve the quality of green spaces, and ensure that people have better access to recreational facilities...</b>
Do not build on the green belt spaces, there are footpaths that are used and views over the landscape which are important to local residents and would be ruined by development. Some of these people will be unaware of this proposed development and the
<b>Q17b - How could we make more of Stockwood Vale or Maes Knoll as important environmental assets to the local area? Could...</b>
Do not urbanise the wild or farmed green belt with a park, leave the area as it is and do not ruin it with a park - this will not be used in the natural way and ruin the areas for local residents.

<b>Q18a - How can we enhance routes for walking and cycling, for example to Keynsham and towards Bristol?</b>
<b>Q18b - How can we encourage greater use of public transport?</b>
Improve the public transport links in and out of Bristol and Bath, there is almost no useful or regular public transport at the moment which is reliable therefore people drive because there is no other option which makes the centres busy and congested. Th
<b>Q18c - How can we encourage people to be more active, more often?</b>
Leave the countryside as it is - those who want to be active in the green belt, walk their dogs and

enjoy the peace of the countryside air and spaces.

**Q18d - What other ideas could be explored to achieve these objectives?**

Think again about the local train services, especially Keynsham.

**Q19 - What sort of employment would be suitable as part of the new development and how much?**

None, there should not be any new development here. It is not a suitable location for a new town centre and location for jobs. New jobs should be near a port or industrial or middle of town centres in Bath and Bristol which are not easy or cheap to access

**General**

**Any other comments?**

Please do not build or change the green belt, it is very important to many peoples lives (including my own), the peace and quiet of it is something that many of us look forward to. It would ruin the centres of the Keynsham and Whitchurch which are mini towns that people enjoy to live in outside of the busy city life. Students do not want to live so far out of cities and the local residents do not want the extra traffic congestion, it makes the roads more dangerous and unpleasant for everyone.

**Respondent**

<b>Name</b>	Thomas Cardew Streatfeild-James
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**Strategic Development Location: Whitchurch**

**Q13a - What additional aspirations would you have here?**

This area should be maintained as an area of open countryside. It is an area of considerable natural beauty and (aside from the generally over-crowded roads) tranquility which is highly valued by local residents and visitors from both Bristol and Bath throughout the year. The travel routes are barely fit for purpose as is and development of housing in this area would make this considerably worse. Public transport provision would also require both massive investment and huge development which would simply not be possible along the majority of routes into Bristol/Bath.

**Q13b - How can this vision be delivered?**

By not allowing this area to be used for large amounts of housing development that would be far better in more suitable locations, namely west Bristol.

**Q14a - Is this the right approach?**

No

**Q14a - Please give reasons for your answer**

There are neither enough jobs or transport links in this area to support the levels of development that are being suggested. The local transport systems are already congested and barely fit for purpose during peak times and so the addition of extra burden

**Q14b - Could some development take place in other areas outside of this broad development location?**

No. The same issues abound all of these areas. Job availability and local transport could not support the increased demand, these issues do not vary in the other areas. Maes Knoll and Queen Charlton are both areas of particular natural beauty and have been

**Q14c - What would be the benefits of this?**

There is no net benefit to any development in this area, it is wholly unsuitable.

**Q14d - What evidence is available to support development in these areas?**

None.

**Q15 - What should happen with the existing separation between Whitchurch village and Bristol urban area? Should we:**

Continue to protect the Green Belt gap & keep the village separate?

**Q15 - Please give reasons for your answer**

The greenbelt area was assigned for a reason and maintaining it is the only way to ensure the prevention of Bristol's urban spillage into areas of nature that are enjoyed by the thousands of people, both who live in the countryside and in the surrounding

**Q16a - How could the existing village centre be enhanced to cater for the needs of an increased population?**

I cannot pass comment as I do not live in Whitchurch village.

**Q16b - How do we best integrate new local centre and facilities with the existing communities?**

There should be no integration (or development) of a new local centre. This is not an appropriate area to develop on the scale suggested.

**Q17a - How can we improve the quality of green spaces, and ensure that people have better access to recreational facilities...**

There is no way that development on the proposed sites could improve the quality of green spaces (by definition it would lessen these), so too the natural environment for the same reasons. This area provides plenty of recreational facilities, including we

**Q17b - How could we make more of Stockwood Vale or Maes Knoll as important environmental assets to the local area? Could...**

Natural, wild and farm areas such as this should not be urbanised at all. "Strategic parkland" is a poor attempt at recreating the natural countryside that this development would be ruining. How can a man-made area designed to be like a natural landscape

**Q18a - How can we enhance routes for walking and cycling, for example to Keynsham and towards Bristol?**

Walking and cycling routes can best be enhanced by reducing traffic on the roads. Overcrowding of roads makes cycling and walking both more dangerous and less enjoyable. The same goes for horse riding in the area which is enjoyed by many local people, an

**Q18b - How can we encourage greater use of public transport?**

More frequent train services to both Bath and Bristol, at the moment they're basically completely useless as they're so infrequent and there is not space at the local station to accommodate commuters to the station. The bike storage facilities are also no

**Q18c - How can we encourage people to be more active, more often?**

Work to improve the current facilities: Keynsham Leisure centre, the rugby clubs, the football clubs, the cricket clubs. Provision of massive new facilities will not make more people exercise permanently and will cost far more than support of these instit

**Q18d - What other ideas could be explored to achieve these objectives?**

More funding for local sports clubs, better trains from Keynsham.

**Q19 - What sort of employment would be suitable as part of the new development and how much?**

There is very little scope for the widespread employment that would be required by the proposed developments. The areas that will be able to provide the levels of opportunities and employment necessary are in the city centers (which are not easily accessi

## General

### Any other comments?

Please, do no ruin this area. The English countryside is something to be truly treasured and proud of. There are very few countries that boast the natural beauty of this area so close to excellent urban hubs such as Bristol and Bath. The area is so desirable because of the hard borders between city and countryside which maintain and keep separate the best of both worlds. If development starts in areas like this, it can never be undone and we will lose these wonderful, natural, traditional, and beautiful areas forever. It is all of our responsibility to both protect them. Not only this, but rushed development in the wrong areas, such as this, will be a costly mistake in the long run and develop in many more problems than we face now. Development is necessary, however, I hope that it's clear that there are many far more suitable areas for this to happen. Thank you.

### Respondent

Name	M veasey
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## Housing Needs and Student Accommodation

### Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...

PBSA would only be allowed on campus, with policies to refuse PBSA elsewhere

### Respondent

Name	Julie Vipond
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## Spatial Strategy Options

### Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?

Option 3 - Dispersed approach

### Q3 - Please give reasons for your answer

Far too much housing centralised in Keynsham and Whitchurch. These areas already unable to cope with traffic and resources. Development needs to be spread throughout the county

### Q7a - What do you think of the proposed road alignment?

Roundabouts could help traffic flow more readily than traffic lights

### Q8b - Do you think it is important to create a healthy neighbourhood by encouraging walking and cycling?

No

### Q8b - Please give reasons for your answer

Good to encourage but developments too far for people to walk and unless whole culture changes which is doubtful there will be massive increase in traffic

## Strategic Development Location: Whitchurch

### Q13a - What additional aspirations would you have here?

Prevent further development until infra structure in place. Many houses but roads already full. Poor expensive bus service. A village that being turned into urban sprawl.

**Q14a - Is this the right approach?**

No

**Q14b - Could some development take place in other areas outside of this broad development location?**

Development in several areas so that not just one area of BANES being turned into a town

**Q15 - What should happen with the existing separation between Whitchurch village and Bristol urban area? Should we:**

Continue to protect the Green Belt gap & keep the village separate?

**Q18b - How can we encourage greater use of public transport?**

Subsidised bus fares

**General**

**Any other comments?**

I feel we should be searching out Brownfield sites to develop rather than further eroding Green belt land and creating huge housing estates which despite best intentions will rely on the car as the major form of transport which will increase the pollution and add to an already congested road system. Pensford to Bristol-8 miles-45-90 minutes and this before Bilbie Green development and Horseworld development completed.

**Respondent**

<b>Name</b>	Valerie Vivian
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**Vision and Spatial Priorities**

**Q1 - Have we identified the critical issues facing the District over the next 20 years?**

No

**Q1 - Please give reasons for your answer**

Not enough houses being built to satisfy need and in particular not enough self-build housing sites being provided in accordance with the Government directives. Not enough small sites for small builders, who have declined by over 50% in recent years to the detriment of the local economy.

**Q2: Are the suggested spatial priorities the right ones?**

No

**Q2 - Please give reasons for your answer**

Not enough houses being built to satisfy need and in particular not enough self-build housing sites being provided in accordance with the Government directives. Not enough small sites for small builders, who have declined by over 50% in recent years to the detriment of the local economy.

**Spatial Strategy Options**

**Q3 - Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?**

Option 2 - Focussed approach

**Q3 - Please give reasons for your answer**

Focus growth in or near settlements to lessen the cost of additional infrastructure and services.

**Q4 - Are there any other approaches/scenarios you think should be considered for accommodating non-strategic growth in B&NES**

Yes

**Q4 - Please give reasons for your answer**

More emphasis on the faltering economy nationally and locally and the dire need to boost all types of small businesses, instead of crippling them with red tape, high charges and a planning system that stifles enterprise and accommodates the NIMBY syndrome.

**Q5a - Have we considered all the issues?**

**Q5a - Please give reasons for your answer**

no comment

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

no comment

### Development Precedents

**Q20c - What other precedents would you use?**

To include starter homes and self- build sites for people who want to build their own homes and small sites for enterprising small builders.

### Housing Needs and Student Accommodation

**Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...**

**Q21b - Are there any other options?**

Not enough houses being built to satisfy need and in particular not enough self-build housing sites being provided in accordance with the Government directives. Not enough small sites for small builders, who have declined by over 50% in recent years to the detriment of the local economy.

### General

**Any other comments?**

Not enough houses being built to satisfy need and in particular not enough self-build housing sites being provided in accordance with the Government directives. Not enough small sites for small builders, who have declined by over 50% in recent years to the detriment of the local economy.

## Respondent

<b>Name</b>	James Wakefield
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## Housing Needs and Student Accommodation

### Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...

Option 3 should be the preferred option, it is the best option for the Corporate Strategy Priorities, keeping student accommodation on campus reduces the need for increased public transport to ferry students across the City, available land in city is freed for new resident housing and small businesses. This option puts residents first as we will not have to bear the consequences of the University expansion. Green Belt land will not be affected. The university will also have a greater say in the type of accommodation built for the students.

## Respondent

<b>Name</b>	Tanya Whittle
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## Strategic Development Location: Whitchurch

### Q13a - What additional aspirations would you have here?

To remain a Village/community and to protect the Green Belt

### Q13b - How can this vision be delivered?

To remain a Village/community and to protect the Green Belt.

### Q14a - Is this the right approach?

No

### Q14a - Please give reasons for your answer

Whitchurch Village will be destroyed. A new road running through it will not help traffic it will cause more traffic. There is little employment in Whitchurch, no shops, doctors, post office, bank.

### Q14b - Could some development take place in other areas outside of this broad development location?

No. Maes Knoll Iron Age hill fort. Development around Whitchurch Village near Lyons Court Farm and land below Maes Knoll would impact on the significance of these heritage assets. Other sites more suitable would be Brownfield sites such as the abandoned

### Q14c - What would be the benefits of this?

Development at the above is near good infrastructure. This lowers car use/mileage.

### Q14d - What evidence is available to support development in these areas?

Infrastructure here is present. Whitchurch Village cannot offer this.

### Q15 - What should happen with the existing separation between Whitchurch village and Bristol urban area? Should we:

Continue to protect the Green Belt gap & keep the village separate?

### Q15 - Please give reasons for your answer

Protect Green Belt, Green Belt is to protect against urban sprawl, to prevent neighbouring towns merge into one another, to assist in safeguarding the countryside from encroachment, to preserve the setting. Keep the Village separate, keep the Bristol

**Q16a - How could the existing village centre be enhanced to cater for the needs of an increased population?**

The existing village centre could not be enhanced. The Village will no longer be a Village.

**Q16b - How do we best integrate new local centre and facilities with the existing communities?**

Integrate? Impossible. Whitchurch Village will become a town/urban extension, dormitory commuter estate.

**Q17a - How can we improve the quality of green spaces, and ensure that people have better access to recreational facilities...**

The Green Belt at present has many clubs for leisure and the remainder is in agricultural use with footpaths for recreational use.

**Q17b -How could we make more of Stockwood Vale or Maes Knoll as important environmental assets to the local area? Could...**

Maes Knoll should be left as it is. Maes Knoll is of compelling importance to the area both panoramically and historically. It already has footpaths for recreational use. I walk up Maes Knoll with my dog , the area is very popular, there are always peop

**Q18a - How can we enhance routes for walking and cycling, for example to Keynsham and towards Bristol?**

Cycling would be dangerous, on this route to Keynsham. This can only be made safer for cyclists by widening the roads and having designated cycle path.

**Q18b - How can we encourage greater use of public transport?**

You cannot encourage use if the buses offer no services and Bus Companies are independent of Council.

**Q18c - How can we encourage people to be more active, more often?**

By keeping the Green Belt having open space for people to enjoy, to walk, run walk the dog, children to play. Possibly walk to work if this is possible.

**Q18d - What other ideas could be explored to achieve these objectives?**

People could be more active and be more of a community if their houses were placed in locations where there are more things already there like employment, shops such as the now abandoned Arena, this would be ideal.

## General

**Any other comments?**

People in Whitchurch Village have overwhelmingly voted for the Green Belt to be retained, why are we being igonred?

The proposal of the link road is unclear from your diagram it looks like it will come out onto Stoneberry Road, Whitchurch. This road is a 20mph zone with a Primary School entrance on it. The pavements are very narrow and have been widened at the school so children have more payment to stand on. To have the ring road come out onto this road would make this a very dangerous road. Also again unclear it looks like the road will cut through adjoining fields to Lyons Court Farm, cutting off farms, where would the cattle graze? and again would impact on the significance of these heritage assets. Also again assume you would then have to go onto Whitchurch Lane to link you up with the other bit of the Link Road. Whitchurch Lane is congested enough, houses are very close to the road, noise levels and air pollution would be dreadful.

There is no suitable route to put a Link Road in Whitchurch. Phase 3 proposal for the Ring road was dropped after public objection not sure why it is now being proposed again?



## Respondent

<b>Name</b>	Roy Williams
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## General

<b>Any other comments?</b>
<p>I am firmly opposed to any further housing development on the land to the North of Manor Close, Wellow.</p> <p>Refs. Well3 &amp; Well4 LPCFS2017/JSP on the proposed Local Plan.</p> <p>This land is on Green Belt and outside the Housing Development Boundary.</p> <p>Farm Lane and Bath Hill is very narrow and would not support any further traffic. Farm Lane is single track highway with nowhere to pass.</p> <p>It is very dangerous for horse riders and pedestrians when they meet traffic in this area as visibility is poor around the bends, that have high walls and banks each side.</p> <p>This land adjacent to Manor Barn and Manor Farm Barn. Planning permission was only granted on those barns back in the 90s subject to this adjacent land being landscaped and not to be built on. This should not be changed.</p> <p>This land is also subject to a free flowing water course from a spring on the land above. This causes flooding of adjacent properties, right down the hill to the Manor House, if not kept under control. The owner of this land has never bothered to control this water course and it has always been down to myself to keep the water course clear to stop flooding.</p> <p>The owner of this land (WELL3) lives miles away in East Grinstead and has never bothered with any upkeep of it. He is only interested in developing it for pure profit.</p> <p>This land is also a haven for wildlife, such as bats, birds, including woodpeckers, slow worms and badgers.</p> <p>Regards Roy Williams</p>

## Respondent

<b>Name</b>	Chris Wilmot
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## Housing Needs and Student Accommodation

<b>Q21a - Which of the options for responding to the universities' growth and demand for student accommodation should be the...</b>
<p>A complete ban on the building of Purpose Built Student Accommodation in the City. Bath has been ruined by the number of these that have been built recently.</p> <p>Also, a complete halt to agreeing more conversion of family homes to HMOs even if the criteria re Article 4 Direction are met.</p>

## General

<b>Any other comments?</b>
<p>It is imperative the council act without delay to halt the further studentification of this once-great city</p>