

## John Theobald

---

**From:** [REDACTED]  
**Sent:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** South Bristol Ring Road

**Categories:** Green Category

Dear Sir/Madam,

I would like to register my objection to the plans for Whitchurch Village and the proposal to turn Whitchurch Lane into the South Bristol Ring Road. The reasons for my objection are as follows:

1. At a time when reclaiming residential neighborhoods from traffic is a concern to the public and policymakers, you are considering turning Whitchurch Lane into the South Bristol Ring Road. A major threat to the quality of life is a high volume of motor vehicle traffic associated with air and noise pollution, road deaths and injuries. This plan would see thousands of additional vehicles using Whitchurch Lane each day. It is already congested by 7:50 a.m. Monday to Friday.
2. The government may breach the Right to Life (Article 2 of the Human Rights Act) if it fails to act in relation to unlawful air pollution levels. How can you monitor, and guarantee, that the ring road will not exceed lawful air pollution levels?
3. Bridge Farm Primary School is located immediately next to Whitchurch Lane. Air pollution, labelled a public health emergency by the World Health Organisation, leads to the premature deaths of at least 40,000 people per year in the UK. It is known to be a major risk factor for childhood asthma (The Guardian, 4th July 2018). Despite scientific research supporting the link between childhood asthma and road pollution you plan to increase road traffic next to an expanding primary school.
4. The proposals are for unsustainable development within the greenbelt and an area that is prone to significant flooding.
5. The effect on junctions and capacity of Whitchurch Lane have not been effectively studied or considered as part of the supporting documentation and the transport studies have errors and missing key information.

Regards

Kerry Abrahams

You are strongly encouraged to make your comments on-line via the Local Plan consultation portal [www.bathnes.gov.uk/localplan2016-2036](http://www.bathnes.gov.uk/localplan2016-2036)

However, if you are using this form, please complete the form by filling in Part 1 with your contact details and use Part 2 for your response to the questions in the Options document.

Please complete a separate form for each **proposed policy approach/option** you are commenting on using the **unique reference numbers** as set out in Chapters 3 - 8.

Please send your completed form(s) using email to [local\\_plan2@bathnes.gov.uk](mailto:local_plan2@bathnes.gov.uk). Alternatively you can post the form to Planning Policy, Bath & North East Somerset Council, Lewis House, Manvers Street, Bath BA1 1JG.

**Your comments must be received by 7 January 2019**

Your comments will be used to inform the next stage of the Local Plan preparation.

<b>Part 1: Contact details</b>			
Email is the Council's preferred method of communication and enables us to contact you quickly and efficiently. Please also provide a postcode with details of your address.			
Personal Details		Agent Details (if applicable)	
Title	Mr	Title	
First Name	Wayne	First Name	
Surname	Braun	Surname	
Job Title <i>(only if applicable)</i>		Job Title	
Organisation <i>(only if applicable)</i>	Douglas Homes	Organisation	
Email	██████████ ██████████	Email	
Address		Address	
Postcode		Postcode	
Date	6 <sup>th</sup> January 2019	Date	

Please tick

I would like to be on the Planning Policy Mailing List and receive updates about future consultations on Planning Policy documents including the Local Plan. I am aware that I can unsubscribe at any time.

## Part 2:

**Which proposed policy approach/option in the Options document (November 2018) are you commenting on?**

### Policy Approach: WCH11

.....  
Please use the unique reference number by each policy approach/option.

**Please make your comments as succinct as possible.**

**Proposed New approx. 1750 parking space Park and Ride and potential retail/ commercial development at Hicks Gate Junction**

#### Current Policy

Current policy being taken in to consideration when compiling this report include;  
B&NES Local Plan 2016-2036 Options Consultation Winter 2018  
- Section 6.21 (page 115) to 6.23, Diagram 42, and policy WCH11.

West of England Joint Transport Study

- Section 6 in particular 6.1 to 6.5 inclusive and Appendix A part 5.

Bristol Core Strategy

- Policy BCS10

#### Identified Sites

The proposed relocation of the Park & Ride is part of an overall package of transport interventions, also including the introduction of MetroBus on the A4, which will manage and mitigate travel demand on this busy transport corridor. In the Options Assessment report the two locational options shortlisted for further assessment are on land to the south west of Hicks Gate roundabout. Furthermore, the location of the relocated Park & Ride is also related to the route of the multi-modal link connecting the A4, A37 and South. It is fully recognised that more detailed assessments will need to be undertaken to determine the most appropriate location for the Park & Ride from an operational perspective and in terms of environmental and other impacts. Appropriate connections to the Brislington SDL, A4-A37 multi-modal link road, Keynsham, Saltford and Bath, including pedestrian and cycle links, will need to be identified.

The proposals will;

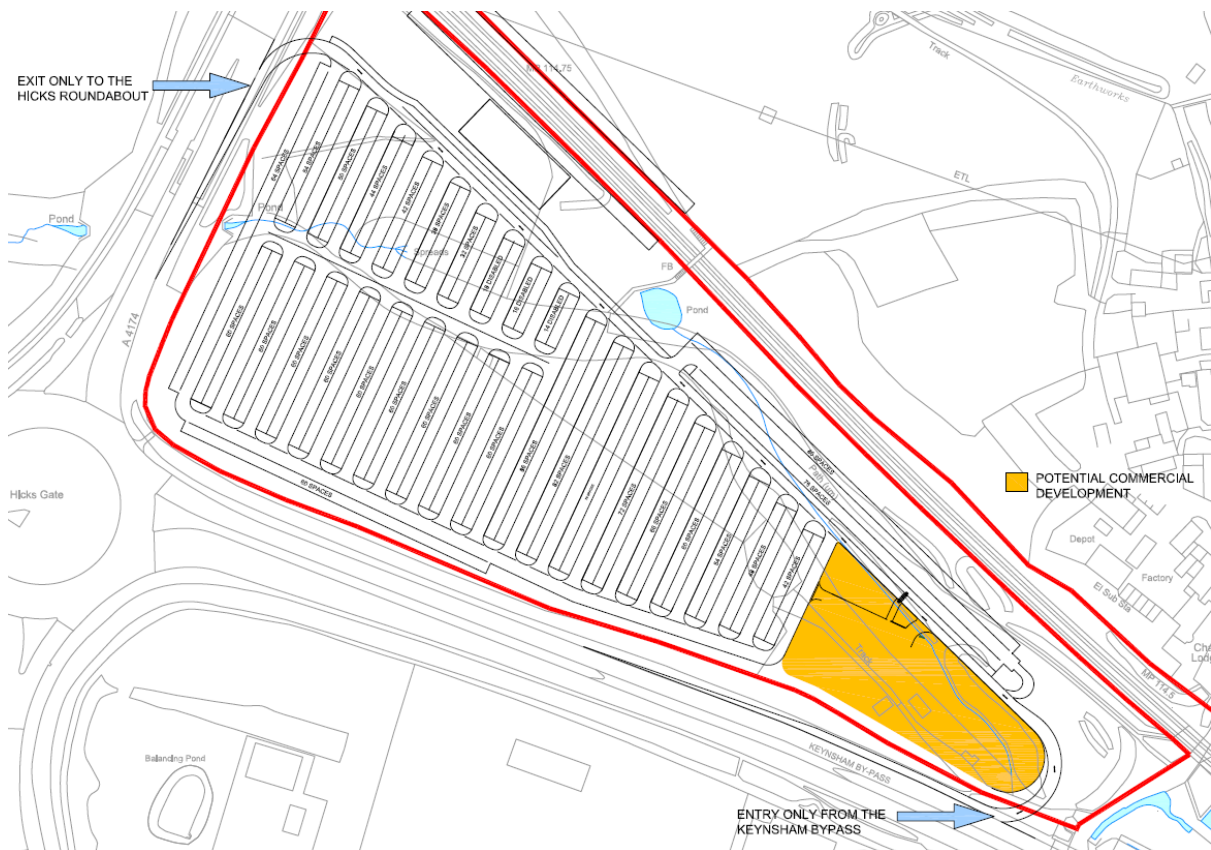
- o Improve travel choices for movements into central Bristol from surrounding towns and rural areas, facilitating park and bus, park and cycle, and interchange.
- o Reduce traffic on radial routes into central Bristol by intercepting traffic at the edge of the urban area.
- o Reduce congestion on the road network in the Bristol urban area.
- o Create scope for reallocation of road space to active modes and public transport.
- o Unlock capacity for sustainable urban growth and new job creation in the Bristol urban area.
- o Improve access to employment and training destinations for residents from outside Bristol urban area, with the opportunity for interchange with feeder bus services from surrounding areas. Access to local services:
- o Improve access to services for residents from outside Bristol urban area, with the opportunity for interchange with feeder bus services from surrounding areas

Until further studies are done, the proposals may;

- o Not provide the opportunity of associated development that will assist in economic case and reduce the burden on other funding sources
- o Only be delivered following protracted land acquisition and studies
- o Require signalised junctions and if so, will introduce delay

**Proposal**

The proposal is for a new P&R site (approx. 1750 spaces) and future retail/commercial development on the northeast corner of the Hicks Gate junction served by a left-in / left-out arrangement. See **Figure 1** below and attached to scale as **Appendix A**.



**Figure 1 - Proposed Site location and Access Arrangements**

**Benefits over others;**

- Reduce infrastructure costs and requirements
- Reduced delay
- Simplicity of access solution
- Opportunity to link with railway network
- Opportunity for a comprehensive mixed-use redevelopment of the area which could provide associated commercial facilities; and incorporate the redevelopment of adjacent Durley Lane Industrial site for housing

**Next Stages**

The next stage will be to meet with representatives of:

- B&NES
- BCC
- SGC
- WECA

Formulate a comprehensive response to current policy and to provide a greater level of development and impact options

See our website for more information and to make your comments online: [www.bathnes.gov.uk/localplan](http://www.bathnes.gov.uk/localplan)

# Hicks Gate

BRISTOL



master plan delivery document

JANUARY 2018



Document designed by Terence O'Rourke Ltd

© Terence O'Rourke Ltd 2018. All rights reserved.  
No part of this document may be reproduced in any form or stored in a retrieval system without the prior written consent of the copyright holder.

All Figures (unless otherwise stated) © Terence O'Rourke Ltd 2018.

Based upon the 2016 Ordnance Survey mapping with the permission of the Ordnance Survey on behalf of Her Majesty's Stationery Office © Crown Copyright Terence O'Rourke Ltd Licence number 100019980.

Contains public sector information licensed under the Open Government Licence v3.0.

Aerial information © Getmapping plc



# Hicks Gate



BRISTOL

master plan delivery document

JANUARY 2018

01 Introduction

02 Site and context

03 The vision

04 Key benefits

05 Site constraints and opportunities

06 Placemaking principles and design rationale

07 Illustrative master plan options

08 Summary





# 01 INTRODUCTION

Crest Strategic Projects and Stratland Hicks Gate Limited are promoting the land at Hicks Gate as a new green gateway to the city of Bristol. This document sets out the reasons why this site provides the perfect opportunity to deliver a successful community on the fringe of the city.

This promotional master plan document has been produced by Terence O'Rourke on behalf of Crest Strategic Projects and Stratland Hicks Gate Limited.

Crest Nicholson is a FTSE-250 company which has acquired a top level reputation for developing quality housing within well-conceived master plans for over 50 years. We create places where people genuinely want to live, work and play and arrange streets, open spaces and buildings to generate the look and feel of an established community and place.

The proposals for a new mixed-use scheme at Hicks Gate have the potential to establish a sustainable new urban extension comprising new homes, a primary school, a new neighbourhood centre, areas for sport, informal parkland with nature conservation interests, and community gardens / allotments. The proposals allow for increasing the size of the existing park and ride or relocating it next to Hicks Gate roundabout, thereby creating an enhanced transport hub.

## Purpose of document

The aim of this document is to demonstrate that the site is available, sustainable and deliverable.

The document sets out the vision for Hicks Gate, starting with an overview of the site including its constraints and opportunities, leading on to the design rationale and placemaking principles that underpin the master plan proposals.

This analysis and review culminates in the illustrative master plan and associated proposal plans, including land uses, alternative development options, street hierarchy and residential densities and the landscape and drainage strategies.



## 02 SITE AND CONTEXT



### Site location

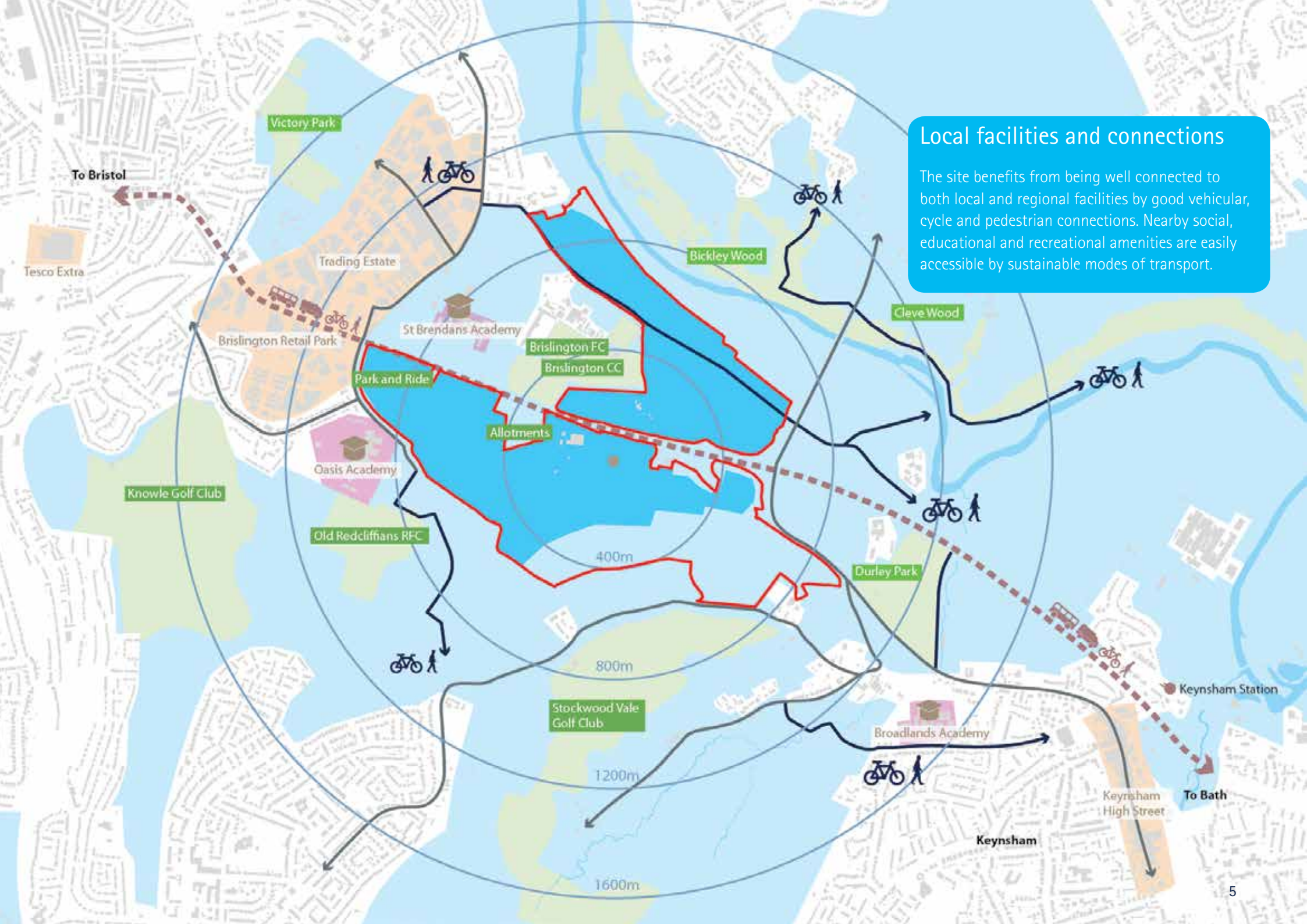
Hicks Gate is strategically located on the south-eastern edge of Bristol and has the potential to deliver a new gateway to the city from the approach via Bath Road (A4).

The A4 runs through the site and provides direct connections to both Bristol and Bath. Excellent bus links connect the site to the city, with high frequency. The site (approximately 95 hectares) is also less than 1.5 miles from Keynsham Railway Station. The Avon Trail, a traffic free cycle route, lies to the north of the site, connecting Hicks Gate to the heart of Bristol.

Lying on the urban-rural fringe, the site is well connected to a wealth of employment, education, recreation, community, leisure, retail and open space amenities. Brislington and Flowers Hill Trading Estate provides a range of commercial uses, adjacent to the site. Hicks Gate is also within close proximity of two large education facilities, Brislington Enterprise College (secondary school) and St Brendan's College (further education). Being at the edge of the city, the site is well connected to open space, including Stockwood Open Space, a nature reserve to the south and west.

**Local facilities and connections**

The site benefits from being well connected to both local and regional facilities by good vehicular, cycle and pedestrian connections. Nearby social, educational and recreational amenities are easily accessible by sustainable modes of transport.



## The site and context

The majority of the site is in agricultural use, comprising a series of fields. The site benefits from a strong landscape structure, which has the potential to be incorporated as part of any proposals.

Topography and drainage are defining features of the site. The site slopes from south west to north east with the land at the highest point to the southwest at approximately 72.5m AOD falling to 25m AOD on the north eastern boundary. The land also gently slopes towards Scotland Bottom stream which runs from west to east across the development site, crossing under the A4 towards Hicks Gate roundabout.

There are a number of other uses within or immediately adjacent to the site boundary:

- Brislington Football Club (founded in 1956) and the adjacent Brislington Cricket Club (founded in 1868) lie to the north of the A4 adjacent to the western boundary. These are served from Ironmould Lane
- Oakleigh House, a listed Georgian country house with gatehouse, served by a private drive from the A4. The house itself is proposed as part of the northern neighbourhood centre, converted into a community use such as a public house with parking and public gardens

- To the south of the A4 is a small group of buildings clustered around Hicks Gate Farm, served from Durley Hill
- Wyevale Garden Centre at the centre of the site is served directly from the A4
- Adjacent to the garden centre are the Council-owned public allotments.



View from public right of way looking east across the site towards Keynsham church



View east along the A4 towards Hicks Gate roundabout



Brislington park and ride



HEATH FARM

BRISLINGTON TRADING ESTATE

ST BRENDAN'S COLLEGE

BRISLINGTON HOUSE

A4174

PARK AND RIDE

BRISLINGTON FOOTBALL CLUB

IRONMOULD LANE

BRISLINGTON CRICKET CLUB

A4

OAKLEIGH HOUSE

PUBLIC ALLOTMENTS

A4

WYEVALE GARDEN CENTRE

HICKS GATE

A4

HICKS GATE FARM

DURLEY HILL

A4175

BRISLINGTON ENTERPRISE COLLEGE

PLAYING FIELDS

## 03 THE VISION

A new community at Hicks Gate will combine a perfect blend of urban living and garden village principles. With the unique position of excellent connections to both Bristol and Bath, it will become the new eastern gateway into Bristol.

The master plan for Hicks Gate is landscape-led and focuses on the creation of a place that encourages healthy lifestyles.

Hicks Gate provides a green gateway to Bristol. A soft and rich landscape structure creates a setting to the proposed development, with views to the country park from the A4. Existing green infrastructure is retained throughout and a strong green grid informs the master plan and the garden village character.

A new local centre is also visible from the A4 and helps to create an active arrival to the neighbourhood. The primary school lies at the heart of the proposals, bringing the community together.

A long distance view to Keynsham Church is maintained from the public right of way in the northern part of the site. A linear park will preserve this view. A setting to the site's listed building is also preserved and informs the character of the adjacent development.

A significant new country park is proposed on the ridgeline to the south of the site.

The proposals can potentially deliver a new enhanced park and ride next to Hicks Gate roundabout.







## 04 KEY BENEFITS

The site is exceptionally well located to deliver a number of key benefits for the local area.

- Potential for an increased capacity park and ride in an improved location
  - Exceptional local and wider connections by foot, cycle, public transport and car
  - New green gateway to the city of Bristol
  - Green belt protection and visual separation between Bristol and Keynsham maintained and protected
  - A landscape-led master plan accommodating up to 1,800 new homes
  - Existing hedgerows and tree belts retained where possible
- New country park providing recreational amenity, visual buffer to development and a defensible edge to the green belt
  - A new local centre which is visible from the A4
  - A 2 form entry primary school at the heart of the community
  - Sports provision for northern and southern neighbourhoods
  - A network of pedestrian and cycle routes



## 05 SITE CONSTRAINTS AND OPPORTUNITIES

### Overview

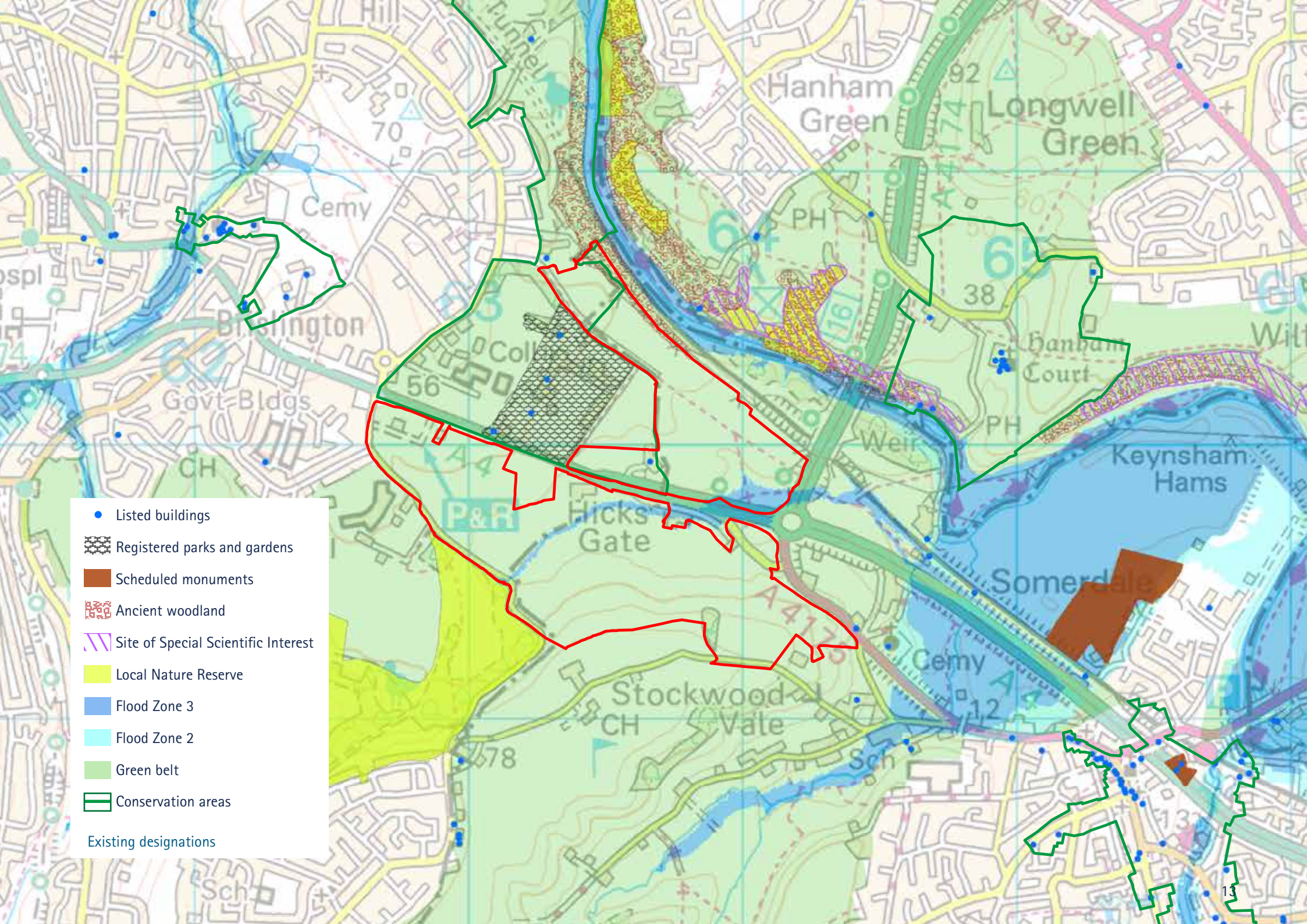
The following pages provide a summary of the key constraints and opportunities and other considerations that have been taken into account during the site analysis and conceptual design stages. For the full analysis and reporting, please refer to the submitted technical reports.

There are no constraints that prohibit the development of the site, although a number of designations and/or site features, such as topography, landscape, ecology, drainage, services, heritage and access have shaped the master plan.

The plan opposite highlights the key designations covering the site:

- The whole site is designated as green belt
- The site is not subject to any statutory or non-statutory nature conservation designations, although immediately adjacent to the south western boundary lies Stockwood Open Space which is a non-statutory Site of Nature Conservation Importance (SNCI) and to the north, woodland within the river Avon valley has the same protection (East Wood and Fox's Wood SNCI)

- Along Scotland Bottom stream a narrow corridor through the centre of the site is designated as Flood Zone 2
- The grade II listed Oakleigh and its associated lodge are the only designated heritage assets within the site and should be retained within any new development, together with their historic curtilage of garden and grounds. The registered park of Brislington House lies immediately to the west of the site. A proportion of the site to the east of Oakleigh Lodge lies within Avon Valley conservation area.



## Landscape

The site and proposals have been subject to landscape and visual assessment. There are some key features which are evident on site and some opportunities that have been considered in the illustrative master plan.

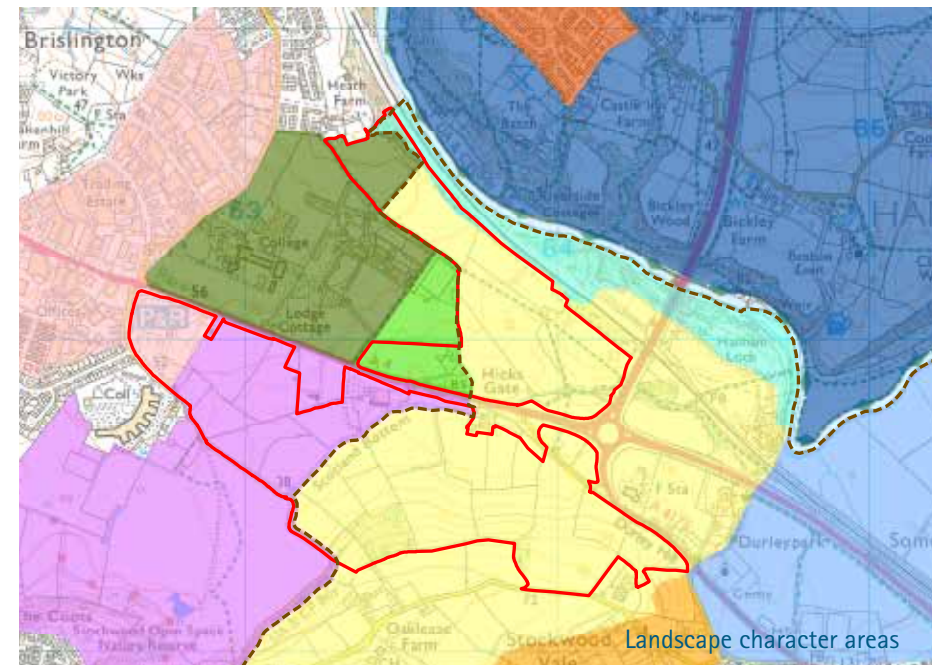
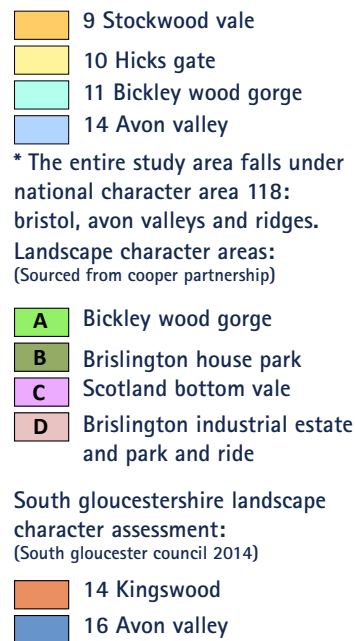
The key features are:

- The prominent Stockwood Ridge south of the A4, where development would be widely visible particularly from the north
- The knoll in the north east part of the site
- Scotland Bottom valley corridor.

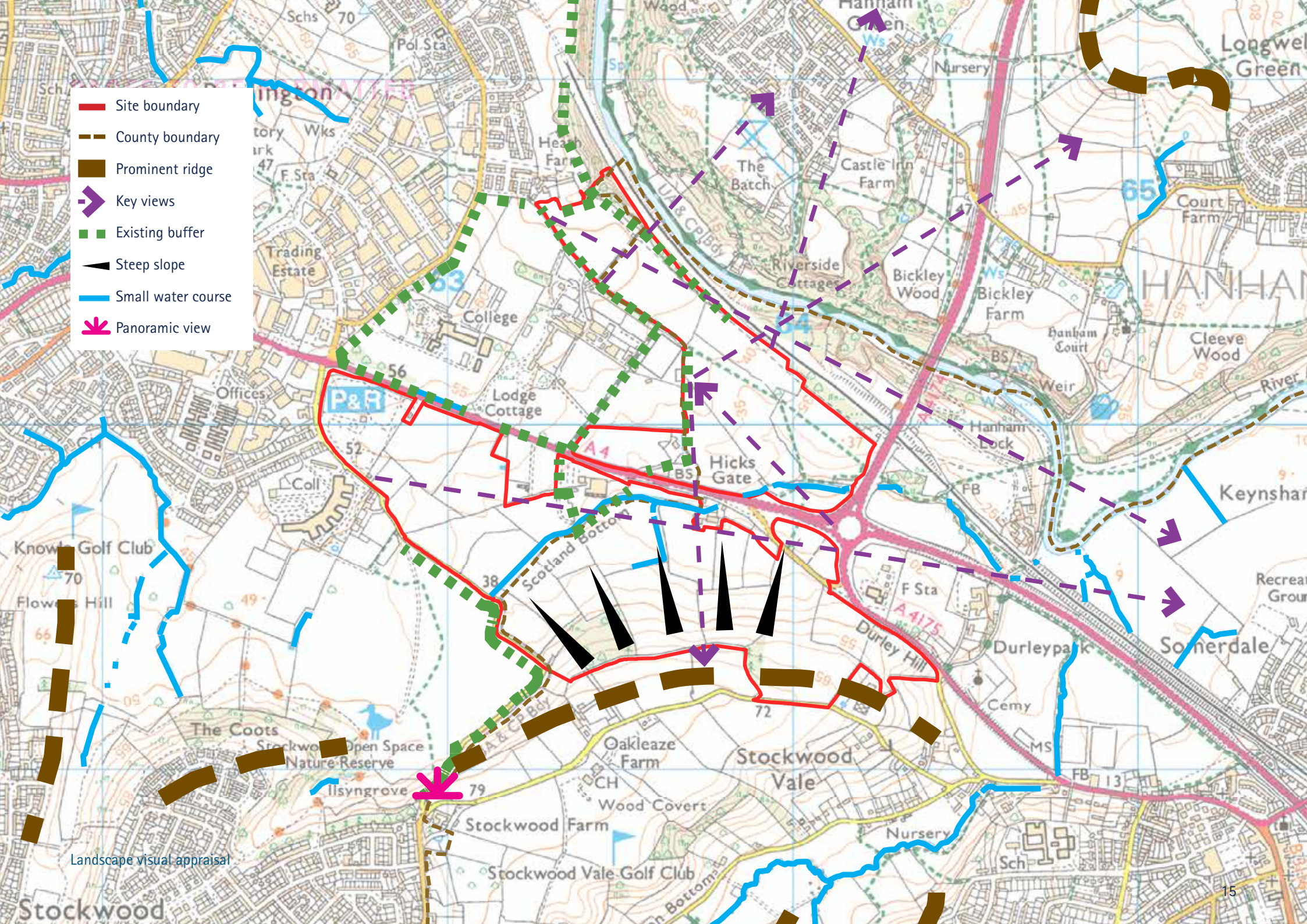
The following opportunities have been identified and taken through into the illustrative master plan:

- There are areas of the site with good visual containment between the existing Park & Ride and Scotland Bottom and adjoining the Brislington House park to the east which provide opportunity for development at a larger scale
- The gently sloping land north of the A4, the northern margins of the site and the lower slopes of the Scotland Bottom valley to the south of the A4, can also be developed in conjunction with appropriate structural landscape planting;

- Opportunity for an appropriate high-quality landscape gateway to Bristol with enhancement of the A4 corridor approach
- A new green belt boundary needs to be defined to create a new, long term edge to Bristol
- Opportunity for new public open spaces serving a variety of community needs, with enhanced public access across the site connecting to the existing public right of way and footway / cycleway network
- Public access along the Scotland Bottom stream corridor with landscape and biodiversity enhancements
- New tree planting in accordance with the Forest of Avon objectives
- Potential for a substantial linear parkland on the upper slopes of Stockwood Hill to the south.



- Site boundary
- - - County boundary
- - - Prominent ridge
- - - Key views
- - - Existing buffer
- ▲ Steep slope
- Small water course
- ✱ Panoramic view



Landscape visual appraisal

## Access and highways

The site has locational benefits as an urban extension to Bristol, being only 5 km from the centre, and closer to Bristol city centre than many other parts of the existing urban area.

There are excellent bus links and frequency of service along the A4 straight into Bristol city centre which will be enhanced through future improvements including a potential rapid transit.

There are direct pedestrian links from the site into the centre of Bristol via the footways alongside the A4. A more scenic and dedicated pedestrian and cycle route along the former railway line connects Bath and Bristol city centres and is within a few minutes of the site. This provides 13 miles of off road route between the two cities with shallow gradients.

Ironmould Lane provides a direct link for pedestrians and cyclists directly into Broomhill, with its existing community uses.

The existing Park & Ride could be extended or relocated to near the Hicks Gate roundabout. Both options provide the opportunity to extend this facility and increase parking capacity to the benefit of commuters.

The site will not preclude the delivery of the Southern Link Road from the Hicks Gate roundabout to the A37.

### Access

The Hicks Gate location is at the junction of an existing main public transport corridor, which is proposed for enhancement in the Joint Transport Study, the strategic road network and a main park and ride facility. This ensures the proper integration of land use and transport planning.

The provision of local facilities would foster an element of self-containment and so help reduce traffic movements on the wider road network.

The existing high standard of public transport accessibility to key destinations, together with future improvements, would help minimise the need to use a car for regular journeys.

The master plan allows the options for future park and ride provision of retaining and extending the existing facility and providing a new multi-modal hub at the Hicks Gate roundabout, or moving the park and ride facility to the roundabout and providing a combined facility. Two or three new access junctions are provided to the south of the A4, depending on the option.

One potential main vehicular access point has been identified north of the A4, combined with one of the junctions on the south side. A second point of access to a limited quantum of development is proposed to the east of Ironmould Lane. The existing junction with Ironmould Lane is retained for established use with left in/left out only movements.

A strategic cycle route passes along the south side of the A4 past the site. This links to a network of designated quiet roads within Bristol. The cycle route also connects via Durley Hill to the centre of Keynsham and via a signal crossing on the A4 with a cycle route along the ring road to the north.

The A4 and nearby local roads have footways, mostly on both sides. These connect to the Oasis Academy Brislington and to St Brendan's Sixth Form College, and beyond. The illustrative master plan proposes connection to these and other public rights of way connecting to the site to maximise pedestrian and cycle permeability and promote non-car modes of movement.

Signposted routes



Park and Ride



Cycle path adjacent to the A4



A4, Bath Road



## Ecology

The ecological resources within and close to the site were assessed through desk based assessment of available data, together with detailed surveys of flora and fauna in 2009. Update data searches and a site walkover were conducted in 2017 to determine the reliance of this data. In summary:

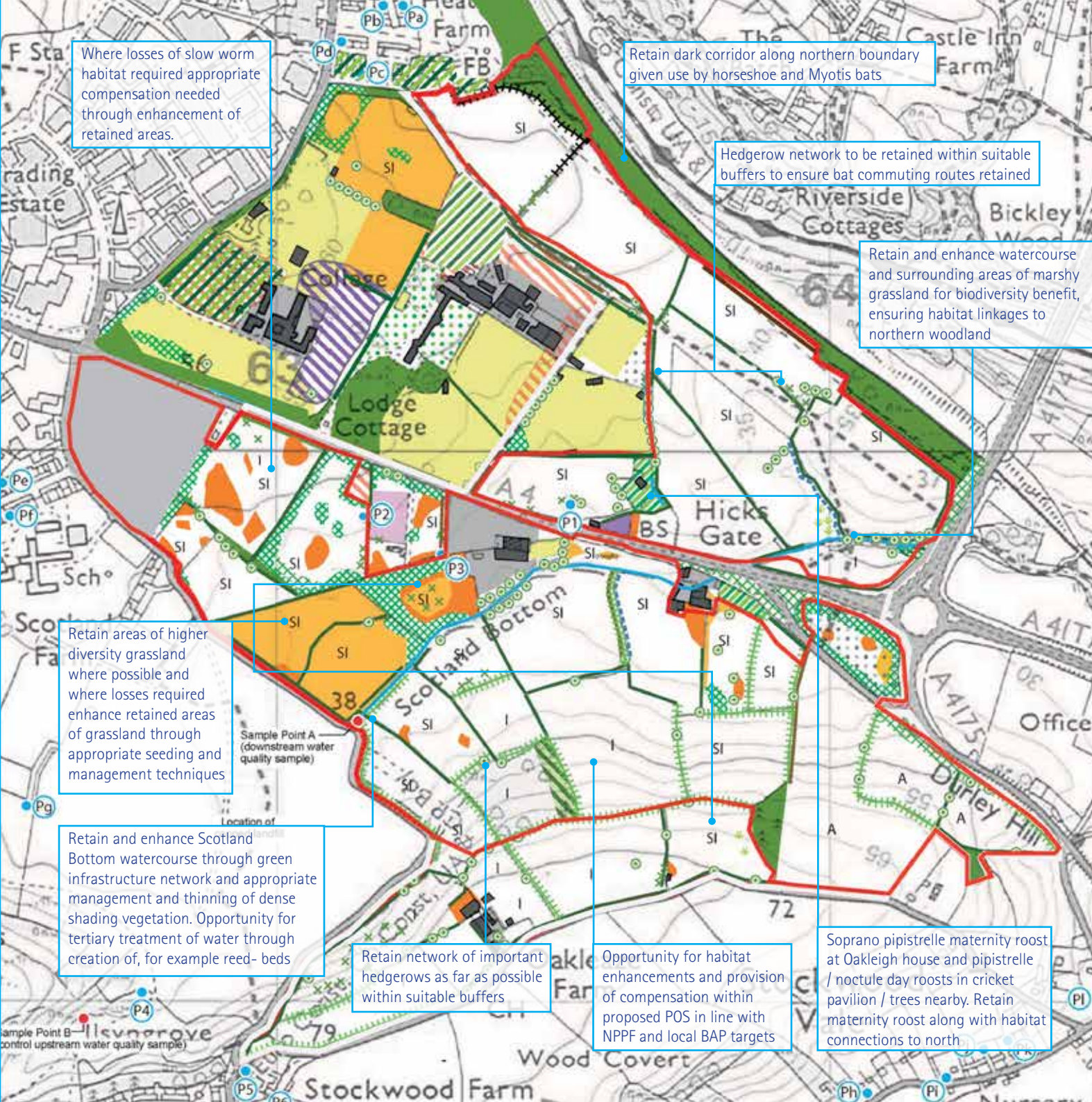
- The site is not subject to any statutory or non-statutory nature conservation designations. However, off-site and to the south, Stockwood Open Space is a non-statutory Site of Nature Conservation Importance (SNCI) and to the north, woodland within the river Avon valley has the same protection (East Wood and Fox's Wood SNCI). The land within the site and between these two SNCIs that is within Bristol City's administration is defined as a Wildlife Network Site; policy protecting such land requires the design of any future development to retain an effective wildlife link between SNCIs, thereby retaining the integrity of the wildlife network. Impacts to European designations within 7km would be avoided through incorporation of multi-functional green infrastructure that delivers adequate recreational opportunities for new residents
- The habitats within the site boundary are of limited interest, comprising predominantly

species poor grassland and arable fields. The hedgerow network has local value, with some hedgerows identified as 'important' under the 1997 Regulations and there are some locally important grassland and scrub mosaics. Bath asparagus, a notable plant species, is located in fields immediately to the south.

- The stream that bisects the site is degraded due to the influence of the landfill area in Stockwood Open Space. Although this poses no threat to human health, water quality improvements could be realised through incorporation of constructed wetlands (reeds or sedge beds)
- In terms of fauna, a good number of bat species, including some of local conservation importance, were recorded, though only in low numbers. A soprano pipistrelle maternity roost was recorded in Oakleigh House. Badgers are active within the site, although the main setts are off-site. The bird and invertebrate interest is relatively low. Although a barn owl roost was found in one of the buildings at Hicks Gate farm in 2009 the roost is no longer present, though the species may still use the site to hunt. A good population of slow-worm was found in longer grassland that is present in some fields. A great crested newt population is known offsite to the south west, although it is more than 500m from the boundary so does

not pose a constraint. No other protected or otherwise important fauna were recorded in 2009

- The opportunity has been taken to deliver multi-functional green infrastructure within the proposed development options to deliver a net gain for biodiversity in line with published conservation strategies, such as the local Biodiversity Action Plans. These include better management of retained and new habitats for wildlife, improvement of the stream, innovative surface water engineering, and multi-functional open spaces to bring people closer to wildlife. Opportunities to improve Stockwood Open Space will also be explored.
- No ecological constraints that would affect the principle of development have been identified. To ensure compliance with policy and legislation, appropriate development design centred around the retention and enhancement of a multi-functional green infrastructure network to retain features of most importance and protected fauna, would minimise adverse impacts and could provide ecological enhancements.
- In advance of any future planning application, updated detailed flora and fauna surveys will be required to inform detailed development design and mitigation and enhancement strategies.



Where losses of slow worm habitat required appropriate compensation needed through enhancement of retained areas.

Retain dark corridor along northern boundary given use by horseshoe and Myotis bats

Hedgerow network to be retained within suitable buffers to ensure bat commuting routes retained

Retain and enhance watercourse and surrounding areas of marshy grassland for biodiversity benefit, ensuring habitat linkages to northern woodland

Retain areas of higher diversity grassland where possible and where losses required enhance retained areas of grassland through appropriate seeding and management techniques

Retain and enhance Scotland Bottom watercourse through green infrastructure network and appropriate management and thinning of dense shading vegetation. Opportunity for tertiary treatment of water through creation of, for example reed-beds

Retain network of important hedgerows as far as possible within suitable buffers

Opportunity for habitat enhancements and provision of compensation within proposed POS in line with NPPF and local BAP targets

Soprano pipistrelle maternity roost at Oakleigh house and pipistrelle / noctule day roosts in cricket pavilion / trees nearby. Retain maternity roost along with habitat connections to north

- |  |                           |
|--|---------------------------|
| Study area                               | Hedgerow                  |
| Species-poor semi-improved grassland     | Species rich hedgerow     |
| Semi-improved neutral grassland          | Defunct hedgerow          |
| Improved grassland                       | Standard tree             |
| Marshy grassland                         | Dry ditch                 |
| Amenity grassland                        | Wet ditch                 |
| Arable                                   | Running water             |
| Mixed semi-natural woodland              | Standing water/pond       |
| Broad-leaved plantation                  | Fence                     |
| Dense Scrub                              | Building                  |
| Scattered Scrub                          | Hardstanding              |
| Orchard                                  | Bare ground               |
| Parkland                                 | Building site (no access) |
| Tall ruderal                             | No access                 |
| Allotments                               | Stone wall                |
| Gardens associated with private property |                           |

## Archaeology and historic environment

The site and proposals have been subject to desk based assessment and non-intrusive fieldwork at the end of the last decade. The results of this work are now complemented by a recent site visit, review of current policy and guidance and new searches with both Bristol and BANES's Historic Environment Records.

Past research and fieldwork indicates the site has low archaeological potential. Prehistoric and Roman remains have been recorded within the study area, including the recently scheduled remains of a small Roman town at Keynsham and Palaeolithic finds within or close to the site. However, there is little evidence of significant sub-surface remains of any date within the site given the results of past desk based assessment, geophysical survey and fieldwalking. Given results to date, archaeology is very unlikely to constrain the siting of development, with further investigation representing suitable mitigation of any adverse effects.

A number of historically significant hedgerows have been identified through map regression. The proposals have been designed to retain these as far as practicable. Limited loss of hedgerows represents a negligible adverse effect.

The grade II listed Oakleigh and its lodge lie within the site. These designated heritage assets will

be retained, but the setting of these early 19th century buildings requires a sensitive approach, with an area of open land proposed around them.

The parcel in which Oakleigh lies is also designated as part of the Avon Valley conservation area. The site's northernmost field and adjacent woodland also coincides with part of this conservation area and an area designated as a locally registered park and garden by BCC.

Beyond and west of the site, the original core of Brislington House's estate is designated a grade II\* registered park and garden and also lies within Avon Valley conservation area. The designated area also contains several grade II listed buildings, including Brislington House itself, originally a purpose built asylum. Most are well enclosed, although the lodge to the house lies immediately

north of the A4, facing the south western part of the site.

There is no clear special interest to the areas of the site designated as part of Avon Valley conservation area which appear wholly agricultural beyond Oakleigh and its curtilage and woodland in the north containing a locally listed inclined plane. The registered parkland to its west has a clear boundary and is well enclosed west of Ironmould Lane. In this context, sensitive development within the two designated site fields would not harm the special character and appearance of the wider conservation area, nor the setting of the grade II\* registered park and its listed buildings.

In the north of the site, the woodland would be retained and the designated field would remain open and grassed as sports pitches. Development

The strong boundary to Oakleigh

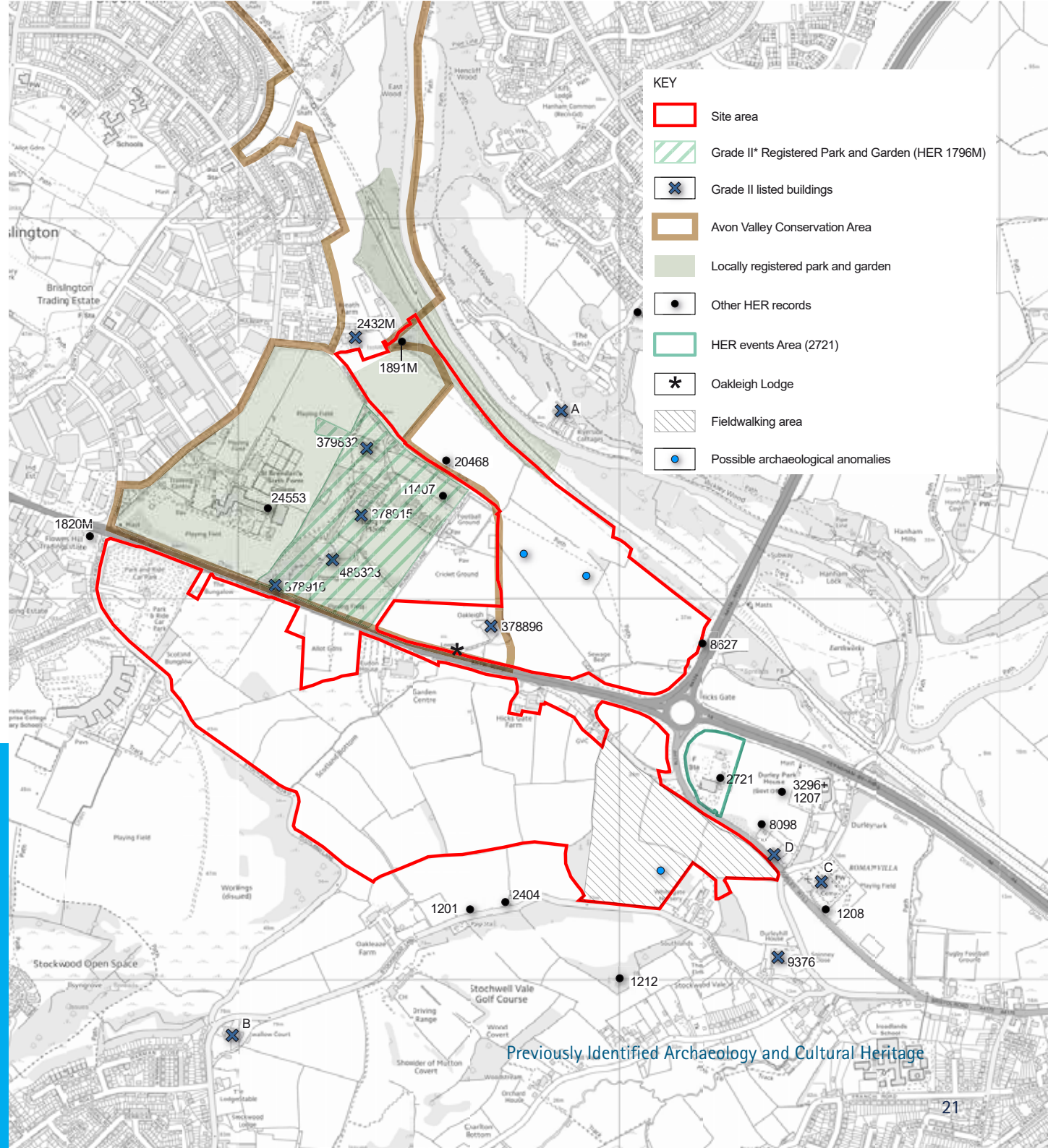


The lodge to Brislington House



would therefore not harm the special interest of the locally registered park and would protect the setting of the grade II listed Heath Court to its north. Sensitive development south of the grade II lodge to Brislington House could enhance its roadside setting. Provision of open space in the south of the site should protect the setting of grade II listed buildings off Durley Hill.

A small number of other grade II listed buildings lie within the study area, with the western edge of Keynsham conservation area well to the east. The settings of these designated heritage assets have been considered, but the proposals would not harm their significance.



## Ground conditions and drainage

No significant constraints to development have been identified from a geotechnical or environmental perspective. However, there are various issues relating to localised contamination or poor ground conditions which would require mitigation.

Site stability issues would need consideration in relation to the presence of shafts and the associated coal mining legacy beneath the site, as well as in relation to development in close proximity to the railway cutting along the northern site boundary. An area of relatively poor ground conditions in the lower lying parts of the site adjacent to the watercourse in the east is currently proposed to be retained as an area of informal open space.

Environmental issues that would require consideration relate to the off-site landfill to the south west beyond Stockwood Lane and associated gas risk to new properties. Radon protective measures are also required for much of the site area.

Full investigation and assessment of the site would allow such issues to be confirmed and appropriate measures to be implemented. However, none of these issues prevent development from taking place sustainably.

## Flood risk and surface water drainage

Existing flood data has been used to assess the risk of flooding to the site. The following provides a brief summary of the findings of the Flood Risk Assessment and surface water mitigation strategy:

- The site is generally at low flood risk from all potential sources, with the exception of land directly adjacent to the Scotland Bottom watercourse that runs through the site. The areas predicted to be at risk from this and or surface water flooding will remain undeveloped, so only areas of the site at low risk of flooding are included for development.
- The topography of the site and the location of the Scotland Bottom watercourse running through the site means the site is well suited to a gravity led overland drainage network. Surface water attenuation is to be provided to restrict the flow to current greenfield runoff rates to ensure no increase in the rates of runoff as a result of the scheme.
- It is proposed that attenuation is provided in a network of swales and localised ponds to provide amenity, conserve water quality, and provide environmental benefits as well as the required storage. The commercial, park

and ride, and school areas are proposed to be attenuated at source, by subsurface solutions such as tanks and oversized pipes, to help minimise the land take of the strategic storage. Other options include permeable paving, green roofs and geocellular storage.

- A schedule of further work is recommended in order to further understand and refine the issues relating to flood risk and surface water on the site, and to inform the detailed design of the project.

## Services

There are a number of mains services crossing the site:

- A large water trunk main has been identified. This will require a 3m – 4m clearance
- Only local foul water sewers were found on site and these do not represent a constraint on development
- Low, medium and high pressure gas mains cross the site, with a maximum clearance of 16.5m for the high pressure main. These clearances and routes have been reflected in the illustrative master plan;
- Diversion of the 33kV cables crossing the site would be required within a new overhead or underground easement corridor
- High voltage cables cross the site and run parallel with the northern boundary. Spatial constraints with an easement 'no-build' corridor and visual constraints need to be considered
- Fibre optic cables are located within the verges of the A4 which require diversion and / or protection to accommodate access points into the site.



## 06 PLACEMAKING PRINCIPLES AND DESIGN RATIONALE

### Crest Garden Village principles

Hicks Gate is currently defined by its urban fringe character. The built form is disjointed and lacks a clear sense of arrival. The site benefits from a number of existing assets which will be incorporated into the master plan proposals and will create a unique and distinctive sense of place.

The master plan will incorporate the core principles set out opposite.







## Design rationale

### Protecting Keynsham



The community at Keynsham values its separation from Bristol. The Bristol ring road, Hicks Gate roundabout and rising ground to the south will retain a significant physical gap and visual separation for Keynsham.

The proposals can be delivered at Hicks Gate without the two urban areas coalescing. Furthermore it can be designed in such a way as to ensure this in perpetuity, providing an effective and defensible new green belt boundary.

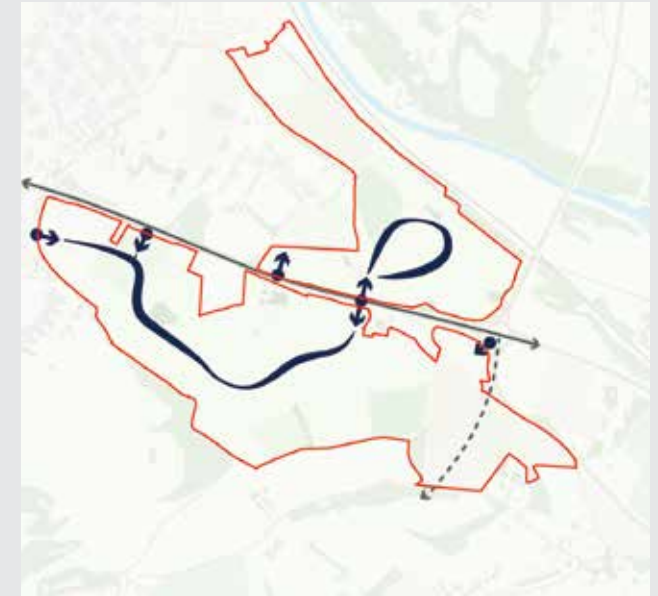
### Rich landscape structure



The site benefits from a rich existing landscape structure which is the main design driver, informing the emerging master plan. The master plan will celebrate and improve the existing green infrastructure network, setting tree belts and woodland within generous green corridors.

The master plan will directly respond to the site's varied topography and ensure that the proposal is truly landscape-led.

### Access and movement



Hicks Gate will be primarily accessed, to both the north and south, by a junction off the A4. A primary route will weave its way through the site, connecting the northern and southern parcels, creating a cohesive neighbourhood. Additional vehicular access points and significant provision of new footpath and cycle routes will ensure excellent connectivity to the site's wider context.

## Landscape and healthy living



The design of the master plan at Hicks Gate is landscape-led, working with existing hedgerows and tree belts. Green infrastructure provides a strong landscape framework across the site.

Pedestrian and cycle routes weave through the proposed landscape, connecting the scheme internally and to the wider network. A country park, neighbourhood parks, play spaces, allotments and nature trails encourage active and healthy lifestyles.

## A green gateway



Due to the site's location at the edge of the city and on the A4, Hicks Gate provides the opportunity to provide an enhanced gateway to the city, on the approach from Keynsham and Bath.

Hicks Gate will provide a soft, green gateway to Bristol, with significant open space and views to the proposed country park visible from the A4. Built form will tighten as the proposal merges with the city.

## Key routes and civic spaces



A spine road runs through the heart of the proposal, linking the northern and southern neighbourhoods, and connecting Hicks Gate to the wider network. Character will vary along its length and key spaces and nodal points will be celebrated through increased activity, public realm design and landmark buildings.

A new local centre will lie on the proposed spine road and will be visible from the A4. The local centre will help to create a vibrant and attractive gateway to the site from the A4.

## 07 ILLUSTRATIVE MASTER PLAN

### Overview

The illustrative master plan demonstrates how development of the site could come forward in a comprehensive and logical manner. The master plan will be able to deliver high quality housing, a relocated and extended park and ride, a local centre and primary school all set within an extensive landscape framework either side of the A4 corridor.

Two master plan options are presented here. Option one retains the existing park and ride with potential expansion space. Option two relocates the existing park and ride east adjacent to Hicks Gate roundabout.

### Option one: retained park and ride



## Option two: relocated park and ride



The two options are presented here together with a summary of uses:

- Around 1,800 new high quality new homes. Including a range of tenures, affordable housing and a variety of dwelling sizes.
- Primary school: provision for a new 2 form entry site
- New local centre that will provide facilities and services to meet day-to-day needs of residents
- Formal sports provision including sports pitches, courts and greens
- Extensive open space: a comprehensive landscape framework that will incorporate a range of functional and accessible uses including allotments, children's play spaces, flood attenuation areas and an extensive country park

## Landscape-led plan

The landscape-led master plan places a strong emphasis on successfully integrating the built form within a landscape framework. Key to this is providing a variety of functional spaces for different users. The master plan presented here begins to outline this strategy, with the final open space provision to be determined through consultation with the relevant stakeholders and the local planning authority. The master plan options incorporate the following:

- **Country park** – The country park will be defined by the topography with the built form edge determined by the existing tree belts the country park will become an important community asset. The park will offer numerous formal and informal walking routes with spectacular views, habitat areas and the opportunity to increase biodiversity within a naturalistic landscape, creating a green edge to the development.
- **Formal sports provision** – around 5 hectares of formal sports provision will be provided in the north west of the site, meeting policy requirements. This could include pitches, courts

and greens and associated changing facilities and potentially a social hub or community building. Dual use of the school playing fields could provide further formal sports provision.

- **Children's play space** – numerous play spaces will be provided throughout the development in accessible and secure locations. These will be designed to appeal to a range of age groups and encourage imaginative play through innovative and naturalistic design of equipment.
- **Allotments** – these will be provided as an extension to the existing Bath Road allotments to the south of the A4. To ensure accessibility allotments will also be provided to the north of the A4. Allotments and/or community orchards provide the opportunity for social interaction and encourage active and healthy lifestyles and can become an important asset to the community.
- **Green corridors** – a series of connected green corridors will extend into the development areas. Primarily utilising the existing landscape

structure, including hedgerows and trees belts, these will provide informal walking routes connecting to the country park, ecological enhancements and wildlife corridors as well as a mature landscape setting to the new homes. Key facilities, such as the primary school, will be located adjacent to one, or more, of these corridors to help establish, off road, safe walking routes to school.

- **Green gateway** – the green gateway aims to create an attractive approach to Bristol from the A4. Development is set back from the road edge to the north allowing for a parkland gateway setting to be created. The southern side of the A4 will have two scenarios depending on the development option taken forward. Option 1, retaining the existing park and ride, will include a transport hub that will incorporate a high degree of landscape planting and sensitive design to retain the landscape gateway aims. Option 2, the relocated park and ride, will incorporate new landscape planting around its edges adjacent to the A4 and significant planting within the parking area to create a green setting.



**Key**

- Primary green corridor
- Secondary green corridor
- Allotments/community orchard
- ⦿ Indicative children's play locations

Indicative landscape strategy

## Movement and access

### Access and circulation

Two new signal controlled junctions on the south side of the A4 would serve the residential areas and local facilities. These would be connected via an internal road forming a main street. The eastern junction would also serve the northern residential area. A further junction north of the A4 to the west of the eastern junction would serve a separate parcel of development.

Access to existing properties on Durley Hill south of the A4 would be maintained. The detail will depend on future arrangements for the park and ride facility and the multi-modal hub.

The illustrative master plans propose a simple street hierarchy as shown. This consists of a central main street linking residential area and the local centre and other community uses together and to the main access points.

From the main streets, secondary streets would provide access into development parcels, often forming internal loop roads or connecting to more strategic footway/cycleways. The main and secondary streets would serve tertiary streets or shared surface spaces serving individual development blocks. The hierarchy would also

include private driveways and shared courtyard spaces.

The overall concept provides a highly permeable and legible street network.

### Public transport

Most of both the northern and southern development areas are within 400 m of the A4, and therefore would be served by existing bus services and a future rapid transit.

The internal road connecting the eastern and western access junctions provides the opportunity for some bus services to be diverted through the southern part of the site.

### Travel plans

Travel plans would be prepared for the residential use to encourage use of sustainable means of transport.

The location of Hicks Gate on an existing main public transport corridor provides the opportunity for the travel plans to promote effective choices of means of transport from the outset of development.

### Pedestrian and cycle networks

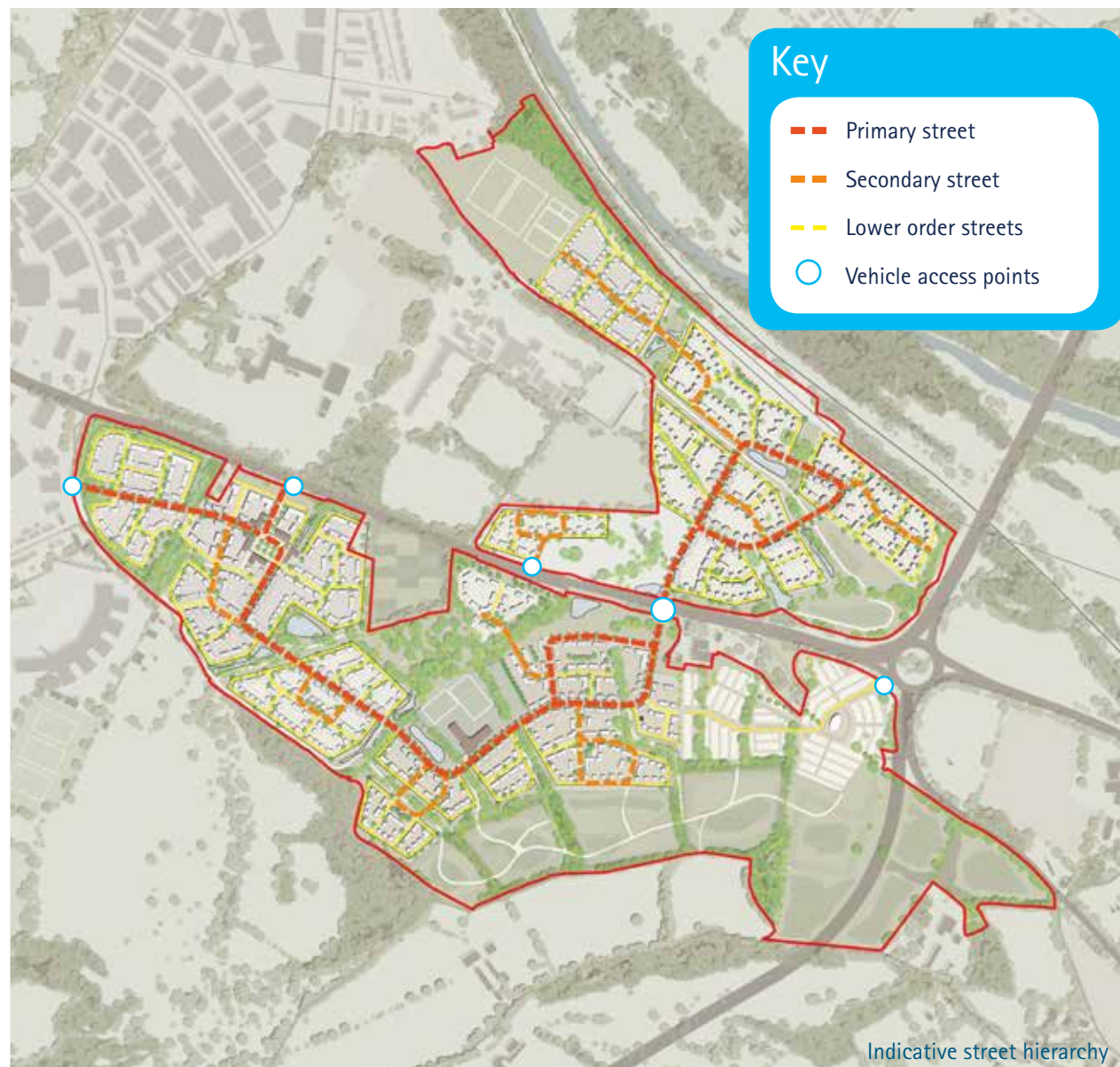
Detailed planning for pedestrians and cyclists is a matter for the more detailed design stages.

However, the illustrative master plan allows for a high standard of internal movement networks giving priority to pedestrians and cyclists. The following key design principles are embedded in the plan:

- Internal roads within the residential areas designed to a maximum 20 mph design speed, with provision for bus movements on the southern internal circulation road or main street
- Footways and cycleways connecting local facilities in both the northern and southern development areas, so ensuring that these facilities are convenient to all residents without having to use the car
- A single primary school to serve both northern and southern areas. For reasons of pedestrian and cyclist safety, and to better integrate the northern and southern development areas, a high standard pedestrian crossing facility would be incorporated in the eastern site

access. This crossing, together with existing and proposed pedestrian and cycle routes, would also serve older pupils heading for the Oasis Academy Brislington and St Brendan's Sixth Form College. The A4 corridor would therefore become much less of a barrier between the two development areas, with pedestrians and cyclists able to cross from one side to the other

- The northern length of Ironmould Lane providing a convenient route to the nearby Broomhill area
- Other public rights of way that cross the site largely retained along green links or diverted along internal streets where necessary, to ensure connectivity to the wider area. This includes linkage to the public right of way that leads to the former Bristol to Bath railway line and is now a strategic footway and cycleway.

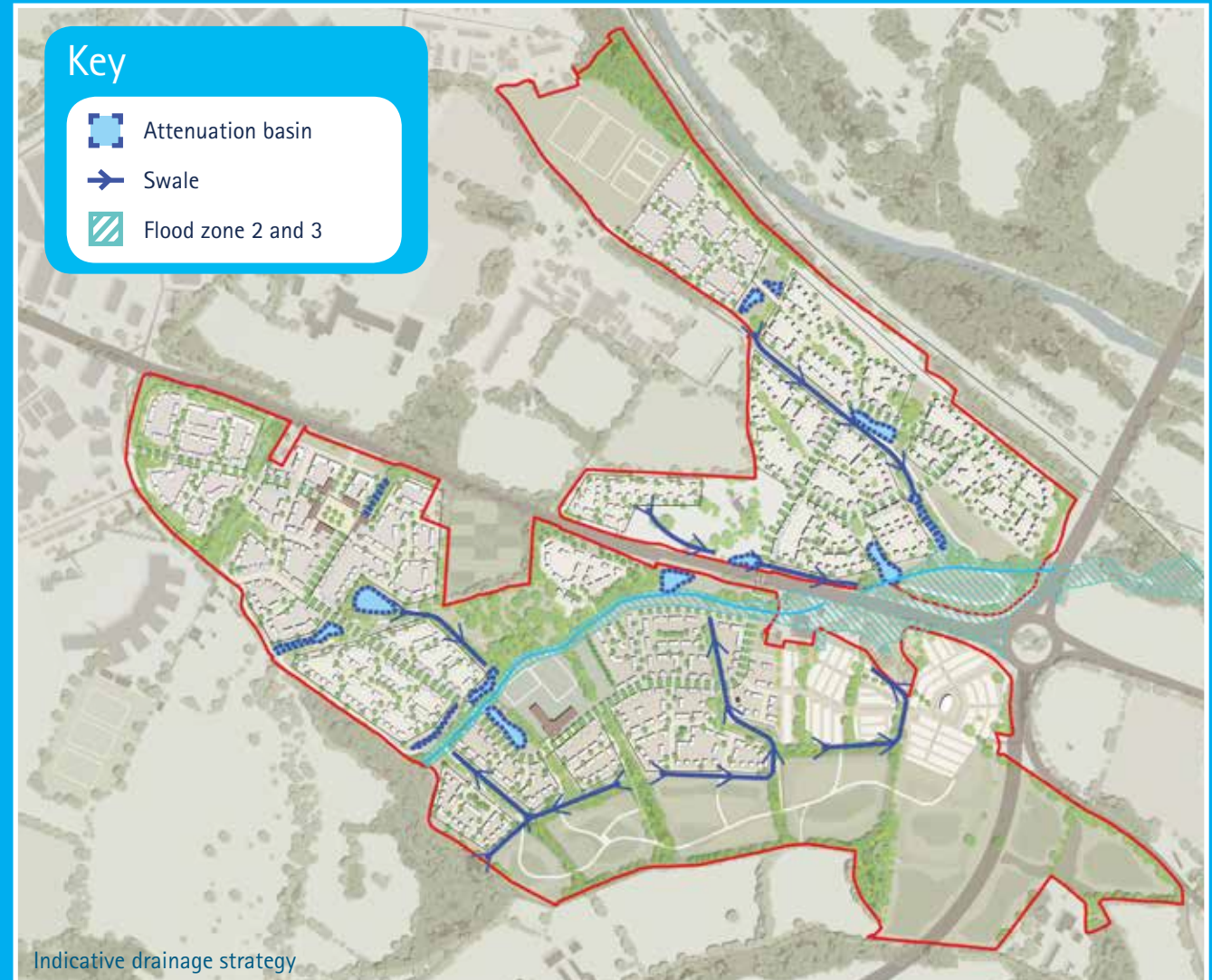


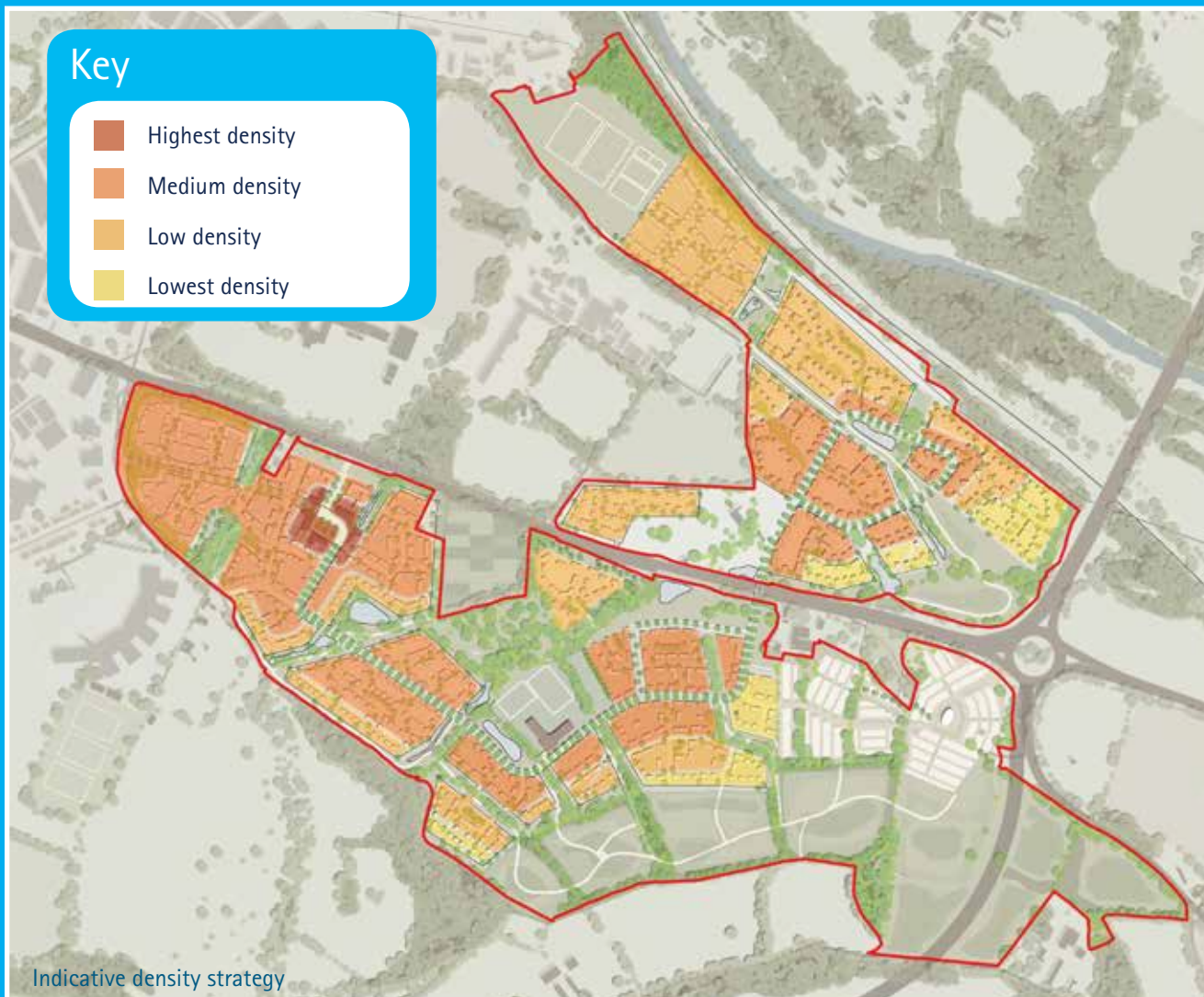


## Drainage strategy

The strategy plan opposite illustrates the form that this drainage strategy could take. A series of swales and other attenuation features would intercept and channel surface water flows throughout the development to minimise underground piping and create a sustainable urban drainage system. The key features of the drainage strategy are

- The drainage strategy intends to replicate as far as possible the existing catchment areas and direction of flow, discharging to the Scotland Bottom watercourse in a similar manner as at present
- A series of east-west swales are proposed to intercept surface flows from higher ground to the south, running parallel with the contours and along the northern boundary of the country park area. These would form landscaped features within the linear park
- Throughout the development, a number of strategic attenuation basins would be located in order to serve the proposed residential areas. On-street swales and traditional piped drainage systems would serve individual development parcels and the flows would be directed by strategic swales to the basins where flow rates would be attenuated to pre-development greenfield values.





## Density

The density strategy is informed by the landscape structure and the key land uses on site. Generally the highest densities will be located closer to the A4, Bath Road and public transport corridors. This includes around the proposed local centre, where densities will be highest, both maximising the number of residents close to services and facilities, and also performing a townscape function emphasising this key element of the master plan.

Lower densities will be located on the fringe of the development, adjacent to the countryside edges and where there is greater visual sensitivity. The density strategy will be progressed together with a townscape strategy as the master plan is developed.

This strategy will allow for a range of house types and tenures and will deliver an average density across the site of around 40 dwellings per hectare.

## 08 SUMMARY

Crest Strategic Projects and Stratland Hicks Gate Limited are promoting the land at Hicks Gate.

The site is strategically located on the south eastern edge of Bristol and has the potential to deliver a new green gateway into the city. It benefits from excellent bus and cycle links to both Bristol and Bath and is exceptionally well connected to local facilities including employment, schools, leisure facilities and local shops.

The master plan for Hicks Gate is landscape-led and will combine a perfect blend of urban living set in a strong landscape setting. It can deliver up to 1,800 new homes, together with a new primary school, local centre, community, gardens/allotments, formal playing pitches and a strategic new area of public open space including a new country park. The proposals also have the potential to deliver an enhanced park and ride facility as part of comprehensive transport infrastructure improvements.

The key benefits comprise:

- Potential for an increased capacity park and ride in an improved location
- Exceptional local and wider connections by foot, cycle, public transport and car
- New green gateway to the city of Bristol
- Green belt protection and visual separation between Bristol and Keynsham maintained and protected
- A landscape-led master plan accommodating around 1,800 new homes
- New country park providing recreational amenity, visual buffer to development and a defensible edge to the green belt



London  
7 Heddon Street London W1B 4BD

Bournemouth  
Everdene House Deansleigh Road Bournemouth BH7 7DU

Telephone 0203 664 6755  
Email [enquiries@torltd.co.uk](mailto:enquiries@torltd.co.uk)  
[www.torltd.co.uk](http://www.torltd.co.uk)



© Terence O'Rourke Ltd 2018. All rights reserved.  
No part of this document may be reproduced in any form or stored in a retrieval system without the prior written consent of the copyright holder.

All figures (unless otherwise stated) © Terence O'Rourke Ltd 2018.  
Based upon the 2017 Ordnance Survey mapping with the permission of the Ordnance Survey on behalf of Her Majesty's Stationery Office © Crown Copyright Terence O'Rourke Ltd Licence number 100019980.

© Terence O'Rourke Ltd 2018  
Document designed by Terence O'Rourke Ltd



## BANES Options Report

# Representations submitted on behalf of Crest Strategic Projects and Stratland Hicks Gate Limited

07 January 2019

Prepared by: Simon Fitton

Alder King Planning Consultants

Pembroke House, 15 Pembroke Road, Clifton, Bristol BS8 3BA

Email: [sfitton@alderking.com](mailto:sfitton@alderking.com)

Tel: 0117 317 1000



## Contents

1.0	Chapter 1 – Introduction.....	1
2.0	Chapter 3 – Spatial Strategy .....	1
3.0	Chapter 5 - Keynsham .....	2
4.0	Chapter 6 – Whitchurch .....	2

---

## 1.0 Chapter 1 – Introduction

- 1.1 Paragraph 1.3.5 references the evidence base supporting the Options Paper. A separate consultation is being undertaken on three Strategic Transport Studies; these studies inform much of the individual chapters of the Options Paper on the Keynsham and Whitchurch SDLs, and the relocation of the Brislington Park and Ride.
- 1.2 It is far from clear why these studies don't sit within the concurrent consultation on the JSP. The JSP consultation includes an 'Emerging Findings Transport Report' that summarises the outcomes of these studies (albeit only the three BANES studies are currently available).
- 1.3 The three available supplementary studies are published outside of the JSP process. The supplementary studies provide key information of direct relevance to the JSP Examination, for example on the relationship between infrastructure within Bristol and SDLs on key corridors.
- 1.4 The Emerging Findings Transport Report is stated as being a document supporting the Joint Spatial Plan. On this basis, all twelve reports on which this report is based should be available as part of the JSP consultation, not subsequent Local Plan Review consultations. The failure to include this material as JSP documentation is highly unsatisfactory.
- 1.5 At the very least, the three studies that are available for BANES should be included within the JSP evidence base. They are intrinsic to the consideration of those SDLs and should not form part of an evidence base that informs a subsequent (ie Local Plan) stage of plan making. It is a very confused message.

## 2.0 Chapter 3 – Spatial Strategy

### **SS5 – Other comments on Chapter 3**

- 2.1 Paragraph 3.2.4 recognises that the JSP is subject to examination and to that end acknowledges that the 'non-strategic growth' figure has yet to be properly tested. The Options Paper suggests that BANES should plan for a contingency in this category in the event that the number were to change.
- 2.2 It is not clear why the same doesn't apply to the overall housing requirement or any of the other categories of supply. Alder King has made clear through its representations on the JSP that a) the housing requirement should be substantially more than the 105,000 homes being planned for, and b) that there are significant objections over the SDL selection methodology, and the evidence and justification to warrant their selection. Moreover we query the ability of those SDLs to deliver in the numbers anticipated before the end of the plan period, not least given the level of 'up-front' infrastructure required to support any homes in these locations, including at Keynsham and Whitchurch.
- 2.3 It is acknowledged that these are JSP issues and that the LP will have to adhere to eventual outcomes of the JSP examination and adopted JSP. Nevertheless, at this stage of plan making, consideration of wider contingency options should be at the heart of plan-making given the BANES LP is being prepared in a cloud of uncertainty.



- 
- 2.4 As expressed at the Issues and Options stage there is a risk that investing significant resource into the preparation of the Plan, and in particular the evidence base that supports it is at risk of being ultimately abortive in the event that there is a significant change in the JSP spatial strategy. It is acknowledged that in the circumstances BANES is 'between a rock and a hard place' and can't be criticised for advancing the Plan, but nevertheless, the Options report should be more explicit about the degree of uncertainty in respect of the current position.
- 2.5 It is not clear if as paragraph 3.2.4 suggests that the JSP Inspectors Report won't be published until 'the latter part of 2019' and paragraph 1.2.4 states that the Draft LP won't be published until after the Inspector has reported, how can it suggest that the Draft LP will be published in summer 2019? We agree that it would be highly prudent to wait until the Inspectors Report is available and the implications properly understood. It therefore seems highly unlikely that the Draft LP will be available until late in 2019/early 2020.

### 3.0 Chapter 5 - Keynsham

- 3.1 There is little value in making detailed comments on the Keynsham SDL as the principle of it needs to be explored through the JSP examination. The SDL seems to offer few benefits to the existing Keynsham community and the infrastructure improvements are largely required to facilitate its delivery. The business case for the infrastructure does not appear in that context to be strong. For the reasons set out in our JSP representations there is insufficient evidence to justify this location ahead of more reasonable alternatives that are able to capture the benefits of existing infrastructure, and maximise the use of that which is planned. Where development and delivery of homes benefits from strategic infrastructure, the business case and prospects for securing funding will be much stronger. The Keynsham SDL does little more than 'consume its own smoke' and detracts from securing funding for other more important strategic infrastructure along the A4 corridor.
- 3.2 CSP and Stratland have consistently advocated that further development at the Brislington SDL extending into BANES is a far more credible option than further development at Keynsham. It has genuine scope to meet Bristol's need at Bristol and benefit from existing and planned strategic infrastructure improvements.

### 4.0 Chapter 6 – Whitchurch

- 4.1 Similar to Keynsham, the issues regarding the justification of the SDL location will be established through the JSP. The principle of development at Whitchurch is not necessarily objected to, however, it will be for the JSP Officers to justify the anticipated delivery of 1,600 homes within the Plan period, given the lack of certainty that exists over the delivery of the southern orbital route; a pre-requisite before any housing completions can occur. BANES will have access to our representations submitted on the concurrent JSP evidence base consultation and will have sight of our submission on the Strategic Transport Studies that explore these issues in more detail.

---

## WCH11 – Policy Approach for the relocation of the Brislington Park and Ride

- 4.2 The relocation of the Park and Ride is acknowledged to form part of the emerging JSP strategy, and as the Sustainability Appraisal and paragraph 6.21.1 identifies, is required to facilitate the development of 750 homes at the Brislington SDL.
- 4.3 Paragraph 6.22.5 is unclear in terms of the scope and intent of any Green Belt review. The JSP will set the context for Green Belt release in the general location to facilitate the delivery of the Brislington SDL. It is not clear from the Options Report whether it is the intent of BANES to exclude land within its administrative area to facilitate the park and ride relocation, or whether the park and ride will remain within the Green Belt.
- 4.4 Whilst these matters will be resolved through the JSP examination, for the avoidance of doubt, in undertaking any detailed Green Belt review paragraph 139 of the NPPF requires local authorities to *inter alia*:
- c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
  - e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and
  - f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.
- 4.5 Officers will be aware that CSP and Stratland are promoting a wider more comprehensive form of development at Brislington/Hicks Gate that extends development north and south of the A4 into BANES land. Comprehensive submissions are made through the JSP and the masterplan document produced in support of those representations is reproduced as **Appendix 1** of these representations.
- 4.6 Those representations contend that in defining the new Green Belt boundary in this location, to accord with the provisions of NPPF paragraph 139, it would be baffling on every conceivable level not to revise the Green Belt boundary to exclude all land between the urban area and the existing A4174 and proposed extension of it to form the new southern orbital road to Whitchurch. Topography constraints combined with the proposed alignment of the orbital road would represent an obvious southern Green Belt boundary assuming the proposed alignment of the road is now fixed.
- 4.7 These are robust boundaries that are not otherwise based on a spurious and arbitrary local authority administrative boundary.
- 4.8 It would be impossible for BANES to demonstrate that the land identified above ‘will not need to be altered at the end of the plan period.’ For all the reasons set out in JSP representations submitted to date the land represents a highly sustainable location for growth that would maximise the benefit of planned transport interventions. There is so little sense in failing to plan comprehensively for development now, albeit it is recognised that these are JSP issues and BANES will need to follow the outcomes of the JSP examination.

- 
- 4.9 Nevertheless, the issue of the location of the park and ride and how that might impact on future forms of development should be at the heart of the decision making process. There appears no consideration of it whatsoever. Paragraph 6.22 identifies that appropriate connections to the Brislington SDL, A4-A37 link road and Keynsham will need to be considered. This is not disputed but it would fly in the face of sound spatial planning not to consider its role in shaping comprehensive forms of development. To comply with NPPF paragraph 139 the land will have to be removed from the Green Belt, heightening the need for consideration of longer term place-making objectives.
- 4.10 Indeed, the masterplan document (**Appendix 1**) demonstrates that CSP and Stratland have considered the relocation of the park and ride and also presented an alternative option of retaining it in its current location. It is after all only being moved to facilitate the 750 homes SDL in Bristol. Comprehensive consideration of the area and what it can deliver could help accelerate delivery (by not moving it) and saving money from the public purse. If the Park and Ride is to be moved, our evidence sets out the preferred location.
- 4.11 As landowner, both the (eastern) park and ride location and southern orbital route would traverse Stratland's land. It is acknowledged BANES has written to all affected landowners and invited them to a dedicated consultation session on 19 November. Again, consideration of a more comprehensive form of development would help accelerate negotiations through any future CPO process. The park and ride is being moved only to facilitate delivery of the Brislington SDL and thus any compensation will need to be based on an equitable basis related to the increase in land value on the existing park and ride site. Similarly a more comprehensive approach to development in this location could result in a different alignment to the southern orbital route. Again, **Appendix 1** sets out an alternative alignment at the Hicks Gate/northern end that could maximise the area's potential. Whilst not wedded to a particular alignment, consideration will need to be given to the lost potential of a significant proportion of the Stratland land.
- 4.12 These will be complex discussions that will need to take place in due course. The fact that the Whitchurch SDL is so dependant on the delivery of the route, and the uncertainties that exist around its delivery and implementation should really signal a warning shot that requires further strategic land to be identified in BANES that is less reliant on such major infrastructure delivery. If the 1,600 homes at Whitchurch are to be relied upon for delivery within the plan period, then significant additional certainty over funding and delivery of the infrastructure required to support it will need to be presented.

## John Theobald

---

**From:** [REDACTED]  
**Sent:** 06 January 2019 12:30  
**To:** Local Plan  
**Subject:** Ring Road - Whitchurch.

**Categories:** Green Category

Dear Sirs,

I strongly object to the plans for a ring road to cut through our Green Belt land which will crate lead to congestion on Whitchurch Lane.

More roads in this area are not what we need.

I object!

Sent from my iPhone

## Local Plan

---

**From:** Simon Fitton [REDACTED]  
**Sent:** 07 January 2019 16:49  
**To:** Local Plan  
**Subject:** Representations on the Local Plan by Crest Strategic Projects and Stratland  
**Attachments:** Appendix 1.pdf; 190107.Reps Final.pdf

**Categories:** Green Category

Dear Policy Team,

I have just somewhat painstakingly responded via the online consultation portal, filling out form 1 time and time again for each representation. I have tried to upload one appendix which is significantly under the 20mb limit but it will not allow. Can you therefore accept the attached as being relevant to our submission in respect of WCH11 – Policy Approach for the relocation of the Brislington Park and Ride?

I am not convinced by the online portal so have attached a complete set of our representations for completeness. Could you please acknowledge receipt?

Many thanks

Simon

**SIMON FITTON**  
**Head of Planning /Partner**

[www.alderking.com](http://www.alderking.com)

### GDPR and Privacy Policy

By responding to this email or emailing Alder King LLP, your name and contact information may be collected, stored and used by Alder King LLP for its legitimate business purposes. If there is no business reason why this information should be collected and stored then please contact the sender of this email. For information about how we collect, store and use your personal data in the delivery of our services and marketing please review our [Privacy Policy](#).

 **Please consider the Environment before printing this email.**

*Alder King LLP is a Limited Liability Partnership registered in England and Wales  
No. OC306796. Registered office: Pembroke House, 15 Pembroke Road, Bristol BS8 3BA.  
A list of Members is available at the registered office.*

*This email is confidential and/or legally privileged and intended for the use of the addressee only. If you are not the intended recipient or the person responsible for delivering the email to the intended recipient please advise the sender immediately. The use, dissemination, forwarding, printing or copying of this email is strictly prohibited.*

*Alder King has taken reasonable precaution to ensure that no viruses are transmitted to any third party but accepts no liability for any loss or damage as a result of the use of this email.*

---

This email was scanned by Bitdefender



OAKWOOD Staff Solutions

Highwall Ln

Highwall Ln

Highwall Ln

Woollard Ln

Ringspit Ln

Charlton Rd

Charlton Rd

Charlton Rd

Dapwell Ln

Dapwell Ln

Woollard Ln

Woollard Ln

Woollard Ln

rd Ln

ingspit Ln



OAKWOOD Staff Solutions

Highwall Ln

Highwall Ln

Highwall Ln

Woollard Ln

Ringspit Ln

Charlton Rd

Charlton Rd

Charlton Rd

Dapwell Ln

Dapwell Ln

Woollard Ln

Woollard Ln

Woollard Ln

rd Ln

ingspit Ln

**Consultation on the B&NES Local Plan  
Options Document (November 2018)**

**COMMENTS  
FORM**

**You are strongly encouraged to make your comments on-line via the  
Local Plan consultation portal [www.bathnes.gov.uk/localplan2016-2036](http://www.bathnes.gov.uk/localplan2016-2036)**

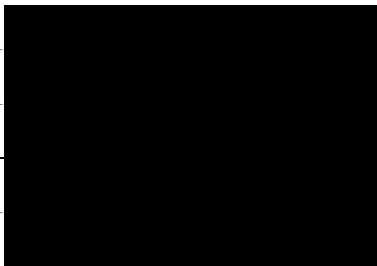
However, if you are using this form, please complete the form by filling in Part 1 with your contact details and use Part 2 for your response to the questions in the Options document.

Please complete a separate form for each **proposed policy approach/option** you are commenting on using the **unique reference numbers** as set out in Chapters 3 - 8.

Please send your completed form(s) using email to [local\\_plan2@bathnes.gov.uk](mailto:local_plan2@bathnes.gov.uk).  
Alternatively you can post the form to Planning Policy, Bath & North East Somerset Council, Lewis House, Manvers Street, Bath BA1 1JG.

**Your comments must be received by 7 January 2019**

Your comments will be used to inform the next stage of the Local Plan preparation.

<b>Part 1: Contact details</b>			
Email is the Council's preferred method of communication and enables us to contact you quickly and efficiently. Please also provide a postcode with details of your address.			
Personal Details		Agent Details (if applicable)	
Title	mrs	Title	
First Name	Louise	First Name	
Surname	Andrews	Surname	
Job Title <i>(only if applicable)</i>		Job Title	
Organisation <i>(only if applicable)</i>		Organisation	
Email		Email	
Address		Address	
Postcode		Postcode	
Date	3/1/19	Date	

**I would like to be on the Planning Policy Mailing List and receive updates about future consultations on Planning Policy documents including the Local Plan. I am aware that I can unsubscribe at any time.**

*Please tick*

**Please note that names and comments will be published**



**Part 2:**

**Which proposed policy approach/option in the Options document (November 2018) are you commenting on? .....whitchurch development – orbital highway.....**

Please use the unique reference number by each policy approach/option.

**Please make your comments as succinct as possible.**

*I have lived at the above property since 1990 and therefore feel i have a good understanding of the area.*

*I also accept that transport links for the immediate and wider area need to be addressed along with addressing the housing need. I accept that develop of land including possibly green belt will be unavoidable.*

*I have taken an interest in proposals for the area over the years as a casual observer of complex information supplied by the authorities.*

*I would like to say in the strongest of terms the area around Whitchurch Lane cannot and will not cope with the road change and the level of traffic that will be in the area as a result of the change. I draw your attention to another change to that road about 10 years ago at a hugh cost £100,000? Which had one way chicane traffic control measures. Looked good on paper to designers of such things, known by locals to be unworkable and the result taken away after lengthy traffic build up and near miss or minor shunts as people raced to get through to avoid waiting for ages on a new flow of waiting traffic.*

*There is also a very large primary school in the local area that has had near misses around congestion at peak times with cars and sometimes children. I myself wrote to Tim Kent around a very minor shunt to me on the Eastnor/East Dundry junction as it is well known as a troubling spot close to a school. Improvements have been made to this area – the new proposals go further than neutralising what was a improvement to making the area more dangerous with hundreds of small children around.*

*If you build the houses im sure you realise Whitchurch has poor facilities. You will be aware you will need to invest heavily in providing for these new people and improvements to the facilities we have already are considered overdue by many local residents.*

*You need to re-think this plan, it will not work well, listen to local people because you will waste a lot of money and will create a situation that will require more effort to unpick than i think you realise.*

*Please expand this box or attach a separate sheet if you require more space.*

**See our website for more information and to make your comments on-line: [www.bathnes.gov.uk/localplan](http://www.bathnes.gov.uk/localplan)**

**Please note that names and comments will be published**

## John Theobald

---

**From:** Malcolm Andrews [REDACTED]  
**Sent:** 05 January 2019 11:49  
**To:** Local Plan  
**Subject:** South Bristol Ring Road  
**Categories:** Green Category

I STRONGLY OBJECT TO THE PLANS. Please register my objections.

I write to you as a resident who lives within Bristol City Council but will be affected by the BANES/Bristol City Council decisions..

I understand that BANES have proposed a new link road that will link up with the Bath Road with an existing residential road in Whitchurch, to form part of the Orbital highway. The proposed road ends on the boundary between the two councils at Ridgeway Lane and Whitchurch Lane.

If this goes ahead, the increased traffic will spew into Whitchurch Lane.

Whitchurch Lane has a primary school right next to it, the pollution will be horrendous! It has a 20 mile an hour speed restriction, a 7.5 ton weight restriction and traffic calming measures (speed humps). The road is not suitable to receive all this additional traffic from the new road that BANES would like to install. The reasons that all, of the above mentioned, where put in has NOT gone away, therefore are still very much needed. Whitchurch Lane is a residential area with houses on both sides.

In addition, BANES want to build 2500 houses in Whitchurch village. There appears to be plans for houses without any consideration to the impact on the existing infrastructure or facilities of the area, in which I live.

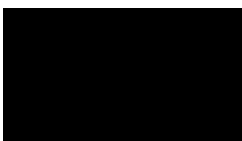
- There is very little employment, people will have to travel out of the area for work, that means using cars as the public transport is limited.
- There are NO shops in the village. Again more car use.
- There is no senior school within walking distance
- No additional doctors surgeries planned. BANES residents are already using Stockwood and Whitchurch Health Centres. These GP's are not coping with the patients that they have already, getting an appointment is already quite difficult!
- The area suggested for housing (and the road that leads to a residential area, is prone to flooding and has an abundance of wildlife on it.

I accept that Bristol needs a true ring road to take it to 2036 and indeed beyond. BUT that road has to be fit for purpose. I accept that people need homes to live in. BUT those homes need to be built primarily on brown field sites and have the roads, jobs, and support systems for the areas to flourish.

The new road and houses, as proposed, will NOT be of benefit to the majority residents in the area and will have a considerable negative impact on them, in very many ways.

Please keep me updated with situation.

Malcolm Andrews



**From:** Patrick Anketell-Jones (Cllr)  
**Sent:** 07 January 2019 14:00  
**To:** Local Plan  
**Subject:** Fwd: Local Plan Consultation January 2019.  
**Categories:** Green Category

**Date:** 5 January 2019 at 19:46:25 GMT  
**Subject:** Local Plan Consultation January 2019.

BTH1 Option 2 would probably result in most of the sites going to housing. Therefore, option 1 is likely to be appropriate.

#### HISTORIC AND NATURAL ENVIRONMENT.

4.9.3 bullet point 2. Policies (NE2?) need strengthening. The green setting has shown itself to be vulnerable on Lansdown at the Ensleigh development where a long line modern housing is prominent and visible from many viewpoints to the east of the city. It is reported that “lessons have been learned”. If so, they must be rigorously applied. Correcting the mistake at Ensleigh, even if it’s possible, will not be easy.

4.9.3 bullet point 5. King Edwards school solution has not been possible by working with partners. If the this heritage is to be conserved (it is deteriorating internally), stronger measures must be taken.

#### BATH RETAIL

Retail premises currently dominate the city centre. This may not continue as demand for physical retail undergoes challenges from digital alternatives. Seeking to prioritise retention of retail and maintain a shopping experience is a flawed approach when the real need will be for a *flexible* planning process that prioritises *occupation* of city centre premises without being specific about the type of business. The function of the city centre will ultimately be market driven and the Council should facilitate rather than stipulate what the market should supply. Emphasising the retail value of small shops is important to the attractiveness of Bath; is there any value in reclassifying small shops as residences with a shop included. The recently opened building society in Stall St is not ideal as it adds neither life nor character to the street but it does at least create occupation.

CITY CENTRE policy should include using buildings for purposes such as office, leisure, entertainment, education and where rents allow, community and creative space. Above all, policies should favour residential use whenever possible. The city centre will sustain future retail more reliably if it has a sizeable local customer base.

## HOUSING

The policy should ensure that the plans for Bath Quays North are not compromised by demand for housing. This is essential employment space and must be accepted as such even though the possibility of using it for housing has many vocal advocates. The BANES Vision puts Bath at the forefront of innovative commerce which will need all the space allocated to economic regeneration if it is to achieve this ambition.

BTH2 Planning policy for the 300 extra homes in Bath should also open the way for micro flats, modular design and large scale shared premises where the sites and their location are deemed suitable.

## VISITOR ACCOMMODATION.

Because there is such a high level of uncertainty over the direction and pace of this sector, the planning system should have built in responsiveness to act quickly when the opportunity for regulation arises.

BTH3 - There is no reason, at this time, not to register all short term let properties with the Authority. Where it has been done in other countries, the total number of premises on the market has reduced.

With the unexpected rise in the supply of visitor accommodation an opportunity is created to bring forward a reduction in the number of coaches bringing Day visitors to Bath.

## TRANSPORTATION.

The vision for Bath in the 2014 Transport Strategy still applies to the creation of a traffic free historic core. Daytime closure of Kingsmead Square and Milsom St should be actively pursued. The AQAP appears to be rushed and not completely necessary. The proposals for the creation of a CAZ are not convincing.

Policies need to prioritise public transport especially local rail. It is possible that car ownership will diminish over the plan period and an increased demand for better quality public transport may emerge.

Parking standards for Bath city centre should offer the bare minimum or no parking at all. EPR. No large scale provision will be possible. Will small scale P&Rs be viable?

## BATH'S UNIVERSITIES.

It must be accepted that Bath is a University City. This is a new status that is equal to its WHS identity. The lack of space for expansion in Bath should have been anticipated as well as the social impact of housing approx 18,000 students however, is just possible to accommodate the Universities within the limitations of a WH City.

If further growth is the objective, the universities will have to seek new campuses in towns and cities beyond Bath.

Student accommodation and housing in Bath are inextricably entwined and that is the way it will remain. Campuses themselves should be the first place for enlarging the stock of student housing but it would be unrealistic to expect all student housing to be accommodated on campus. The demand for external SH will be in the city and PBSA is the best solution despite its disadvantages. It does relieve pressure on HMOs that take up family housing, it can be closely managed to optimise control of waste disposal and reduce noise levels. The 10% proportion cap on SA should apply to PBSA.

It is alarming that some PBSA is unaffordable for students and is being given over to short term and visitor lets. Policy must do what it can to stop this happening. Commercial letting damages the reputation of the universities and stokes resentment amongst residents.

BTH6 - If there is PBSA surplus to requirement, its secondary use must be housing.  
Can it also be made evident that the universities and their student accommodation are not sustainable in a small city without a financial contribution to the local services on which they depend.

BTH 4, Option 3 is probably the best choice for accommodating university expansion.

BTH 5 at 35%, the proportion is too low. Student Accommodation blocks are very profitable and their rental value should be shared more equitably.

#### HOUSEHOLD REUSE AND RECYCLING.

A single large facility on the southern fringe of Bath is not the best solution. It will attract cross city traffic adding to congestion and pollution. Having a subsidiary recycling centre on the north side of the city would reduce the traffic flows and encourage people to recycle locally.

SB3 Manvers St. development on this site should compliment the commercial purpose of BQN.  
Priority should be given to employment first and housing second.

DM13. Fast food takeaways. Apply both options. These businesses are disruptive and antisocial.  
Policy should respond their undesirability.

SB16 Burlington St. Student Accommodation would not be acceptable.

Cllr Patrick Anketell-Jones  
Lansdown Ward.

## John Theobald

---

**From:** wendy arnold [REDACTED]  
**Sent:** 06 January 2019 22:28  
**To:** Transport Planning; Local Plan; [REDACTED]  
**Subject:** New ring road  
**Categories:** Green Category

I STRONGLY OBJECT TO THE PLANS. Please register my objections.

I write to you as a resident who lives within Bristol City Council but will be affected by the BANES/Bristol City Council decisions..

I understand that BANES have proposed a new link road that will link up with the Bath Road with an existing residential road in Whitchurch, to form part of the Orbital highway. The proposed road ends on the boundary between the two councils at Ridgeway Lane and Whitchurch Lane. If this goes ahead, the increased traffic will spew into Whitchurch Lane.

Whitchurch Lane has a primary school right next to it, the pollution will be horrendous! It has a 20 mile an hour speed restriction, a 7.5 ton weight restriction and traffic calming measures (speed humps). The road is not suitable to receive all this additional traffic from the new road that BANES would like to install. The reasons that all, of the above mentioned, were put in has NOT gone away, therefore are still very much needed. Whitchurch Lane is a residential area with houses on both sides.

In addition, BANES want to build 2500 houses in Whitchurch village. There appears to be plans for houses without any consideration to the impact on the existing infrastructure or facilities of the area, in which I live.

- There is very little employment, people will have to travel out of the area for work, that means using cars as the public transport is limited.
- There are NO shops in the village. Again more car use.
- There is no senior school within walking distance • No additional doctors surgeries planned. BANES residents are already using Stockwood and Whitchurch Health Centres. These GP's are not coping with the patients that they have already, getting an appointment is already quite difficult!
- The area suggested for housing (and the road that leads to a residential area, is prone to flooding and has an abundance of wildlife on it.

I accept that Bristol needs a true ring road to take it to 2036 and indeed beyond. BUT that road has to be fit for purpose. I accept that people need homes to live in. BUT those homes need to be built primarily on brown field sites and have the roads, jobs, and support systems for the areas to flourish. The new road and houses, as proposed, will NOT be of benefit to the majority residents in the area and will have a considerable negative impact on them, in very many ways.

Please keep me updated with situation.

Sent from my iPhone