

Date: 07 January 2019
Our ref: 264294
Your ref: -



Lisa Bartlett
Divisional Director – Development
Bath and North East Somerset Council
BY EMAIL ONLY
Local_Plan2@bathnes.gov.uk

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Ms Bartlett

Planning consultation: Consultation on the B&NES Local Plan 2016 – 2036: Options and related projects

Thank you for your consultation on the above dated 10 November 2018 which was received by Natural England on the same date.

General

Natural England has considered the Local Plan Options consultation document alongside the Interim Sustainability Appraisal and Habitats Regulations Assessment.

The current Local Plan is being reviewed in the context of the Joint Spatial Plan (JSP) which has established the amount of additional housing and economic growth needed for the West of England and a spatial strategy for where it should go. Within B&NES, it is proposed that the majority of new housing will be directed to the North Keynsham and Whitchurch Sustainable Development Locations, with some through urban intensification in Bath and non-strategic development in Somer Valley. This approach seems reasonable in the context of the JSP, although it should be noted that the non-strategic growth component has not yet been subject to detailed environmental assessment.

The Options document appears to demonstrate a good understanding of the plan area and the likely effects of the various spatial and policy options, positive and negative, including on the natural environment. In terms of spatial strategy, Policy SS3, in our view, enables most flexibility to deliver growth while limiting risks to ecology, landscape and GI assets.

We particularly welcome the proposed approach to green infrastructure and are pleased to see that the essential and cross cutting role of multifunctional green infrastructure in achieving sustainable development is well reflected through the Options document and will be an integral part of planning the SDLs, urban intensification in Bath and non-strategic development.

We also welcome the reference in the Options document to the JSP strategic priority to secure a 'net gain' for biodiversity. This approach is strongly encouraged by the Government's 25 Year Environment Plan and the NPPF and is currently the subject of a Defra consultation that proposes a mandatory obligation for development to deliver net gain. We would therefore expect the B&NES local plan to include policy for net gain and to set out the options for how that will work.

Natural England supports the use of the Defra biodiversity metric as a tool to be used in conjunction with ecological advice to quantify biodiversity net gain in the terrestrial environment. It calculates before and after habitat value in terms of 'biodiversity units'. Natural England encourages the incorporation of the 10 best practice principles developed by CIRIA/CIEEM/IEMA for those

delivering biodiversity net gain.

Natural England is working to update the Defra biodiversity metric to take account of stakeholder feedback and we plan to release a new version (Defra Biodiversity Metric 2.0) in Spring 2019, accompanied by detailed guidance and a tool to apply the metric.

We are pleased to see that paragraph 8.17 explains the essential role of the WoE GI Plan. The GI Plan will establish a shared approach to identifying and resourcing green infrastructure priorities, including net gain principles and a suitable mechanism for securing developer contributions and other funding sources.

Location/topic specific-comments

BTH9 Policy Options for Bath Park & Ride provision – we suggest the P&R options (especially to the east of Bath) should be clearer about risks to the AONB and the Bats SAC.

4.9 Historic and Natural Environment - 4.9.3 Key challenges section would benefit from a reference to the WoE GI Plan. We also note the reference to ensuring *development and change avoids any likely significant effects to the SAC and the protected population of bats*. The Interim HRA is at an early stage but has identified the potential for LSE to occur as a result of the emerging Options - as such we suggest this is amended to clarify that the challenge is to avoid adverse effects on the integrity of European sites (AEOI).

4.19 University of Bath - We suggest the university options would benefit from a specific reference to the Bath & Bradford on Avon Bats SAC.

6.6.2 Development Area Definition – We are pleased that strategic GI network will be a key element for defining development areas for Whitchurch SDL. We suggest that the GI network and opportunities to enhance it should be an equally key element of defining development areas in other parts of the Plan area, including Keynsham SDL, Somer Valley and other locations where significant development is proposed.

8.4 Harnessing wind energy – We support the council in taking a strategic approach to wind energy and we would also encourage the council to extend this approach to other forms of renewable energy, including solar farms.

Interim Sustainability Appraisal

The SA has identified negative or uncertain effects for some options in relation to the Sustainability Objectives and proposes mitigation/enhancement measures, many of which note the need for further work and/or assessment. We consider the SA undertaken to date is proportionate for this early stage of the plan preparation and should provide a robust framework for more detailed assessment as the Plan progresses.

Interim Habitats Regulations Assessment

Bath & North East Somerset contains and is close to several European Sites.

The interim HRA considers the main elements of the Options document and identifies a potential for adverse effects on Bath & Bradford on Avon Bats SAC, Chew Valley SPA and Avon Gorge Woodlands SAC to occur as a result of the some of the policy options, and proposes potential mitigation measures. It also refers to the West of England Joint Spatial Plan (JSP) Habitats Regulations (HRA) requirement for a West of England Green Infrastructure Plan, which will identify the strategic measures, mechanisms and monitoring to support the delivery of the mitigation for needed for protected sites, and notes that strategic mitigation solutions will need to be adopted at Local Plan level, where potential impacts to European Sites are identified.

We would advise that the HRA makes it clearer that the strategic approach to mitigation solutions on

European sites applies equally to non-strategic growth, not least in recognition of the potential for cumulative effects.

As recognised in the interim HRA, a key element of mitigating adverse effects on Bath and Bradford on Avon Bats SAC will be to establish likely effects on foraging habitat and flyways and how and where any avoidance and mitigation measures needed can be delivered. In addition, we support the reference to the use of the emerging SAC Horseshoe Bat Consultation Zones (based on the North Somerset Bat SAC Supplementary Planning Document) to determine habitat value of the development locations in relation to the Bats SAC and to help define the nature and extent of habitat retention or provision required. The interim HRA also highlights the importance of avoiding light spill or an increase in light levels to the river corridor. We agree and suggest *Protecting bats in waterside development guidance* will also be relevant when considering North Keynsham SDL and other development in close proximity to the River Avon and Kennet and Avon Canal.

Based on the information available at this time, we concur with the interim HRA findings that the emerging policy approach, with incorporated mitigation measures, does not raise significant concerns in terms of meeting requirements of the Habitat Regulations.

We would be happy to comment further should the need arise but if in the meantime you have any queries relating to the advice in this letter please contact me on 07900 608311.

Yours sincerely

Amanda Grundy
Somerset, Avon & Wiltshire Area Team

HELAA: Call for Sites 2018

GUIDANCE ON COMPLETING THIS FORM

Sites can be submitted for the HELAA between 12th November 2018 and 7th January 2019. Please return this form, a plan that clearly and accurately identifies the site boundary and any other attachments to: **planning_policy@bathnes.gov.uk** or Planning Policy, Planning Services, Bath & North East Somerset Council, Lewis House, Manvers Street, Bath, BA1 1JG (email preferred) by 7th January 2019.

- MS Word Users: Please enter text or tick boxes where requested, and please chose Yes / No / Unknown from the available drop-down menu.
- Apple Pages Users: Please enter text where requested, delete where applicable and if you cannot tick the appropriate boxes please indicate your choice with text beside the relevant box.

Data Protection Statement: This information is collected by Bath and North East Somerset Council as data controller in accordance with the data protection principles in the General Data Protection Regulations. The purposes for collecting this data are: to assist in plan making and to contact you, if necessary, regarding the answers given on this form. Some of the data relating to specific sites will be made public as it will form part of the evidence base used to inform the creation of planning policy documents. The above purposes may require public disclosure of any data received on the form, in accordance with the Freedom of Information Act 2000.

1. PREVIOUS SUBMISSIONS
a. Has this site previously been submitted? Yes
b. Previous reference number (if known): Please enter text here.
c. If the site has already been submitted, how does the information provided in this form change the information you have previously provided to us? Please enter text here.

***Please choose/delete where applicable**

2. YOUR DETAILS		
a. Name:	Georgina Nelson	
b. Company/organisation:	Barton Willmore	
c. Address:	101 Victoria Street, Bristol	
d. Postcode:	BS1 6PU	
e. Telephone:	0117 929 9677	
f. Email:	Georgina.nelson@bartonwillmore.co.uk	
g. Status (please mark all that apply):		
i. Owner (all/part of site)	<input type="checkbox"/>	<i>If acting on behalf of landowner/ developer, please provide client name and address details (including postcode):</i> Please enter text here.
ii. Land agent	<input type="checkbox"/>	
iii. Planning consultant	<input checked="" type="checkbox"/>	
iv. Developer	<input type="checkbox"/>	
v. Amenity/community group	<input type="checkbox"/>	
vi. Registered housing provider	<input type="checkbox"/>	
vii. Other: Please enter text here.		
h. Ownership details (please mark where applicable):		
i. Owner of entire site <input checked="" type="checkbox"/>	ii. Owner of part of site <input type="checkbox"/>	iii. No ownership of site <input type="checkbox"/>
i. If owner/part owner, have you attached a title plan and deeds with this form?	No	
j. If you are not the owner of the entire site, please provide details of the (other) owner(s), if known		
	Please enter text here.	
k. Does the owner (or other owner(s)) support your proposals for the site?	Yes	

*Please choose/delete where applicable

3. SITE DETAILS	
a. Site Address:	Former Garden Centre Site, Cholwell, Temple Cloud
b. Postcode (where applicable):	BS39 5DQ
c. Current Land Use	Grassland
d. Adjacent Land Use(s)	Residential uses and agricultural land
e. Relevant Planning History (including reference numbers, if known)	Please enter text here.
f. Please confirm that you have provided a site plan:	Yes

4. POTENTIAL USES & CAPACITY		
Suggested uses (please tick all that apply and where mixed use indicate % of overall site for each use)		
USE	SELECT	Capacity (number of units) and indication of possible residential tenures, types and housing for different groups
Residential dwellings (C3)	Yes	The site has been identified to suit a development of 10 residential dwellings. Thus yielding a density of 21 dwellings per hectare.
Residential – self-build dwellings only	No	Please enter text here.
Other residential, e.g. student accommodation, residential care homes etc (specify)	No	Please enter text here.
Office, research & development, light industrial (B1)	No	Please enter text here.
General industrial (B2) / warehousing (B8)	No	Please enter text here.
Sports / leisure (please specify)	No	Please enter text here.
Retail	No	Please enter text here..

***Please choose/delete where applicable**

5. SITE SUITABILITY

Question	Answer	Further details including details of further studies undertaken / mitigation proposed
Does the site have any physical constraints (e.g. topography, access, severe slope, vegetation cover etc.)?	No	There are a small number of trees and low lying vegetation within the site. Bordering the site are hedgerows and dense planting. However any proposal would seek to retain the existing hedgerow where possible.
Is the site subject to flooding?	No	The site is not identified to be within flood zones 2 or 3 as shown on the Environment Agency's 'Flood Map for planning'.
Is the site affected by 'bad neighbour' uses (e.g. power lines, railway lines, major highways, heavy industry)?	No	No 'bad neighbour' uses have been identified to have an effect on the potential of the site for a residential development. The site is bounded by the A37, agricultural land and residential properties.
Is there a possibility that the site is contaminated?	No	Assessment has not been undertaken, but contamination considered unlikely given the land use.
Can satisfactory vehicular access to the site be achieved?	Yes	Access can be achieved directly from the A37 Upper Bristol Road. Access (inc. dropped curb) remains from the sites former use as a garden nursery.
Has the Highways Agency been consulted?	No	Please enter text here.
Is the site subject to any other key constraints?	No	The site is positioned outside of the settlement boundary. However the sites location and surroundings (inc. residential dwellings) means that this should be not preclude development of the site.

a. UTILITIES / INFRASTRUCTURE PROVISION

Please tell us which of the following utilities are currently available to the site:

i. Mains water supply <input checked="" type="checkbox"/>	ii. Mains sewerage <input checked="" type="checkbox"/>
iii. Electrical supply <input checked="" type="checkbox"/>	iv. Gas supply <input checked="" type="checkbox"/>
v. Landline telephone <input checked="" type="checkbox"/>	vi. Broadband internet <input checked="" type="checkbox"/>

***Please choose/delete where applicable**

vii. Other (please specify):

Please enter text here.

viii. Please provide any other relevant information relating to site suitability:

Please enter text here.

***Please choose/delete where applicable**

6. SITE AVAILABILITY

Question	Answer	Further details including details of further studies undertaken / mitigation proposed
Are there any legal/ownership constraints on the site that might prohibit or delay development of the site (e.g. ransom strip/covenants)?	No	Access to the site can be achieved directly from the A37
Must land off-site be acquired to develop the site?	No	Please enter text here.
Are there any current uses which need to be relocated?	No	The site is currently vacant
Is the site owned by a developer or is the owner willing to sell?	No	The site is not owned by a developer, therefore they would be willing to sell.

a. When do you estimate the first housing completion could realistically occur (if applicable)?

- i. Within the next 5 years ii. 6 to 10 years iii. 11 to 20 years

b. What do you estimate the rate of delivery to be?

NB Year 1 is the first year of delivery:

Year	1	2	3	4	5	6	7	8	9	10	11-20
Number of units completed in year	Enter Units	Enter Units	Enter Units	5	5	Enter Units	Enter Units	Enter Units	Enter Units	Enter Units	Enter Units

c. Do you have any information to support when the site will come forward and its phasing? Please consider suitability, achievability and constraints.

Please enter text here.

***Please choose/delete where applicable**

7. SITE ACHIEVABILITY

Question	Answer	Comments / Further Details
Are there any known significant abnormal development costs (e.g. contamination remediation, demolition, access etc.)? If yes, please specify.	No	Please enter text here.
Does the site require significant new infrastructure investment to be suitable for development? If yes, please specify.	No	The site is located within close proximity to other residential properties and is well served by transport connections.
Are there any issues that may influence the economic viability, delivery rates or timing of the development? If yes, please specify.	No	Please enter text here.
Has a viability assessment / financial appraisal of the scheme been undertaken?	No	Please enter text here.
Have any design work studies been undertaken?	Yes	A sketch layout for 10 dwellings has been prepared.

8. ADDITIONAL COMMENTS

Please enter text here.

***Please choose/delete where applicable**



 Site Boundary
 (0.48 Hectares)

Project
Garden Centre Cholwell
Temple Cloud Somerset

Drawing Title
Site Location Plan

Date	Scale	Drawn by	Check by
26.03.14	1:1,000@A3	CW	GT
Project No	Drawing No	Revision	
21401	9000	-	



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bartonwillmore.co.uk



From: [REDACTED]
Sent: 06 January 2019 20:05
To: Transport Planning; Local Plan
Subject: Proposed Orbital Highway/Additional Housing in Whitchurch
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 who will be affected by the BANES/Bristol City Council decisions regarding the above proposals.

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 force cars into Whitchurch Lane.

Whitchurch Lane has Bridge Farm 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 why all of the above restrictions were put in has NOT gone away... they are still very much needed. Whitchurch Lane run through 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, meaning using their cars as the public transport is limited.
- There are NO shops in the village. Again more car use.
- 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 proposed, will NOT be of benefit to the majority of residents in the area and will have a considerable negative impact on them, in very many ways.

Mrs R Noble



Virus-free. www.avast.com

Paul Rixon

From: Sean Noonan <sean.noonan@stevevick.com>
Sent: 02 January 2019 16:07
To: Local Plan
Subject: Draft Local Plan consultation

Categories: Green Category

I am writing to add my support for the four policy proposals submitted by John Branston on 14th December 2018, namely:

1. DM17 / H2

Suggested policy: Any application for an increase in the number of licensed occupants for any HMO within the HMO SPD Stage 1 test 'density map' ('red zone') will be refused.

2. BTH4

Suggested policy: Any application for purpose-built student accommodation (PBSA) within the HMO SPD Stage 1 test 'density map' ('red zone') will be refused.

3. DM15

Suggested policy:

- a. Purpose-built student accommodation is no longer to be exempt from parking standards. The line '*In the case of student accommodation, zero parking provision will be made in all locations, exclusive of any visitor and operational requirements*' is to be removed from the B&NES parking standards guidance;
- b. Parking standards for PBSA, exclusive of visitor and operational requirements, should be set at around 0.25 spaces per resident, to reflect a realistic level of car usage among students, except where PBSA is sited directly on a University campus.

4. BTH2 / DM11

A site-specific development policy for Wansdyke Business Centre is proposed for inclusion within the Local Plan as follows:

- a. Residential development, development as economic/commercial space, or a mixture of these uses. Residential development could include a variety of specialist older persons housing types but not student accommodation where this would prejudice the achievement of Policy DW1 and B1 in respect of boosting the supply of standard market and affordable housing;
- b. Development should seek to repurpose the older, red-brick buildings on the west of the site and should be sympathetic to the Victorian/Edwardian context of terraced housing on Monksdale Road / Beckhampton Road, Third Avenue and Melcombe Road.
- c. Development should be conscious of its appearance from higher ground across the city and from the immediately adjacent Linear Park;
- d. Development should respect the character (material) and roof heights in the area in accordance with the Building Heights strategy, with local terraced housing providing the reference 'prevailing' ridge and shoulder heights;
- e. Where the site faces Third Avenue, the opportunity should be used to form a focus to the view southwards along Third Avenue, in the same way that the 'Scala' completes the vista at the northern end of Third Avenue and the Church of Our Lady & St Alphege is framed when looking southwards along Second Avenue;
- f. Designs brought forward for the site must recognise the importance of the setting of Grade II* listed St Alphege & Our Lady church;
- g. Development should respect the amenity of the adjacent primary school sports facility in terms of preserving afternoon daylight / avoiding shadow, while ensuring safeguarding of the children is enhanced by any proposed scheme;
- h. The design response must recognise the importance of the Linear Park as a connective habitat, particularly as dark corridor for bats, and as a protected sustainable transport route.


Kind regards,

Sean Noonan


85 West Avenue,
Bath, BA2 3QD

Operations Director



 +44(0)1225 864864

 07768 811585

 www.stevevick.com



 [Leave a review on Google](#)

Spatial plan

I am left incredulous that there is a proposal to build 2,500 homes in and around Whitchurch Village on green belt land. The green belt around Whitchurch I am left incredulous that there is a proposal to build 2,500 homes in and around Whitchurch Village on green belt land. The green belt around Whitchurch was reviewed in the last two to three years when the planning approval to build 200 homes on the site of the previous "Horse world" site was given. There can be no review of that same green belt within a few short years merely to suit the interest of developers. The settled position is that another review must wait for circa 25 years.

Whitchurch village is grid locked during peak commuter times and when lorries break down traffic is jammed for miles. The air pollution is intense at these times. The proposal to add a main road possibly dual carriageway will attract several times the volume of traffic to the village and will make air quality unacceptably poor. You cannot justify people being drawn to the village by the new roads and the added incentive of a park and ride near Whitchurch. The fields around Whitchurch are a vital lung for an already overcrowded area.

These houses could not be sustained unless you drive a new road through the environs of Whitchurch village. As you know, Roads can never be justified merely to allow development of housing. Without the road the houses cannot be built; without the houses the road has no purpose.

The traffic volumes shown are taken from 2011 which is low traffic.

There have been terrible problems with doctor surgery access within Whitchurch and Hengrove. I am part of the Armada practice and I have suffered the poor service. The Whitchurch village 2,500 homes will introduce meltdown.

Moving to the proposed 5000 plus additional homes in and around Hengrove/Whitchurch the same issues will be transferred to the home occupiers either side of Whitchurch Lane and Ridgeway Lane. Life and air quality will be unsustainably poor. Noise pollution will lower health and well being.

It is unbelievable that the noise and air quality issues will affect Bridge Farm School fully and by definition the St Bernadette primary and Secondary schools. In addition there are hundreds of units of sheltered and "special sheltered" homes in Whitchurch and Hengrove and these residents will be affected by earlier mortality by the noise/air issues. In addition crossing roads for the frail and for young children will make local access much more difficult and this will lead to more car journeys and for older people less independent walking and/or cycling.

Ridgeway Lane is a long established residential area and any concept of a "Ring road" is the stuff of a remote planning body with no due diligence on the devastating effect on life for local people.

The presentation of the plan is appalling. I doubt that more than 1% of local people have the time and/or ability to comprehend all the implications. There should have been several executive summaries in plain English approved by the "crystal society" or an equivalent body.

No attempt has been made to make these plans useable /intelligible for local people.

Lastly there has been an obvious "keep mum" policy about these inhuman plans. Most people had no idea about these plans, even as ideas until the publicity caused by the huge public attendance at the British Legion Club in Whitchurch.

No planning inspector worth their salt should allow any further progress on this outrageous, dystopian concept which has been gestated in "a style which the union of Soviet republics would recognise.

I am left incredulous that there is a proposal to build 2,500 homes in and around Whitchurch Village on Green belt land. The green belt around Whitchurch was reviewed in the last two to three years when the planning approval to build 200 homes on the site of the previous "Horse world" was given. There can be no review of that same green belt within a few short years merely to suit the interest of developers. The settled position is that another Green belt review must wait for circa 25 years.

Whitchurch village is grid locked during peak commuter times and when lorries break down traffic is jammed for miles. The air pollution is huge at these times. The proposal to add a ring road will attract several times the volume of traffic to the village and will make air quality unacceptably poor. Whitchurch will now be a short cut to the M4. You cannot justify people being drawn to the village by the new roads and the added incentive of a park and ride near Whitchurch. The fields around Whitchurch are a vital lung for an already overcrowded area.

These houses could not be sustained unless you drive a new road through the environs of Whitchurch village. As you know, Roads can never be justified merely to allow development of housing. Without the road the houses cannot be built; without the houses the road has no purpose.

The traffic volumes shown are taken from 2011 which is dishonest.

There have been terrible problems with doctor surgery access within Whitchurch and Hengrove. I am part of the Armada practice and I have suffered the poor service.

The Whitchurch village 2,500 homes and the additional Hengrove and greater Whitchurch homes will introduce meltdown.

Moving to the proposed 5000 plus additional homes in and around Hengrove/greater Whitchurch the same issues will be transferred to the home occupiers either side of Whitchurch Lane and Ridgeway Lane. Life and air quality will be unsustainably poor. Noise pollution will lower health and well being.

It is unbelievable that the noise and air quality issues which will affect Bridge Farm School fully and in a less direct manner, the St Bernadette primary and Secondary schools are not discussed. In addition there are hundreds of units of sheltered and "special sheltered" homes in Whitchurch and Hengrove and these residents will be affected by earlier mortality by the noise/air issues. In addition crossing roads for the frail and for young children will make local access much more difficult and this will lead to more car journeys and for older people less independent walking and/or cycling.

Ridgeway Lane is a long established residential area and any concept of a "Ring road" is the stuff of a remote planning body with no due diligence on the devastating effect on life for local people.

The presentation of the plan is appalling. I doubt that more than 1% of local people have the time and/or ability to comprehend all the implications. There should have been several executive summaries in plain English approved by the "crystal society" or an equivalent body. No attempt has been made to make these plans useable /intelligible for local people.

Lastly there has been an obvious "keep mum" policy about these inhuman plans. Most people had no idea about these plans, even as ideas until the publicity caused by the huge public attendance at the British Legion Club in Whitchurch.

No planning inspector worth their salt should allow any further progress on this outrageous, dystopian concept which has been gestated in "a style which the union of Soviet republics would recognise. Consultation responses required over a Christmas period merely rub salt into the wounds.

From: Paul O'Leary [REDACTED]
Sent: 06 January 2019 22:30
To: Local Plan; Planning Policy
Subject: Objection to Local plan

Categories: Green Category

Planning Policy
B&NES, Lewis House,
Manvers Street,
BATH BA1 1JG

Dear Sir/Madam,

www.bathnes.gov.uk/services/planning-and-building-control/planning-policy/local-plan-2016-2036

The proposal to build up to 5000 houses across the proposed link road in the form of approx. 2500 homes at Whitchurch village, 750 homes on the existing Park and Ride site at Brislington along with the additional homes reported on the Garden Centre site and surrounding fields. This figure is disproportionate to other areas giving the feeling of discrimination for our area.

Air pollution already exceeds the National guidelines and will only increase with a further minimum increase of 5000 cars on already congested roads.

The proposed residential and road development is to be all on Green Belt land. Residents were recently asked about the JSP and 98% of respondents wanted the Green Belt retained. The NPPF at paragraph 14 clearly states that housing targets should not override constraints. At Whitchurch Village two such constraints are the Green Belt and Flooding.

The proposed link road A4174 to Whitchurch Lane will in no way reduce the congestion of vehicles heading into Bristol as ultimately they will still end up on either the A4 or A37. With the additional homes the existing traffic issue will only be made worse. The road will however run the risk of becoming a short cut for travelling from Somerset and Devon onto the motorway network along with HGVs using the link road to avoid the M4 / M5 interchange.

Highways Officers have publicly stated that their plans will not improve the traffic situation which would seem then to be a complete waste of public money.

The only element of the proposal that works is to move the Park and Ride closer to Hicks Gate roundabout and to reopen both lanes into Bristol on the A4. However building 750 homes on the existing site would clearly make that road improvement pointless.

The green belt study here
http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/LP20162036/lp_201636_io_whitchurch_green_belt_assessment.pdf

makes it very clear that *"The assessment shows that all the cells make a MAJOR CONTRIBUTION to checking the unrestricted sprawl of large built up areas. The introduction of development into these cells would therefore have a highly negative impact on the Green Belt in relation to this purpose."*

The green belt is made up of pasture which is home to countless wild animals including deer, foxes, badgers, birds of prey including a number of beautiful owls. On a smaller scale but no less important we have a huge variety of wild birds both nesting and migratory, the hedgerows and pasture are home to millions of vital insects which are suffering from shrinking habitats, once these insects, birds and animals are gone they are gone for good.

Beyond this is the emotional wellbeing element, the homes that are immediately affected by these proposals have been on the "edge" of Bristol since they were built. We live here not because it's convenient to get to the city centre but because we want a quality of life that this area has offered for many generations.

We are very lucky to have such a beautiful piece of unspoilt countryside on our doorstep and it should be protected at all cost, there are businesses, families, animals that will be destroyed as a result of this unworkable unsustainable proposal.

Therefore I want to state that I strongly object to these proposals.

Regards
Paul O'Leary

