

THIS OPTIONS DOCUMENT AT 1.31 CLAIMS TO 'FOCUS ON THE ISSUES WHICH NEED REVIEW OR SIGNIFICANT CHANGE WITHIN THE LOCAL PLAN.

ON THIS POINT I SUBMIT AS FOLLOWS :

A The option document FAILS to provide a balance between economic social and environmental considerations FOR ALL COMMUNITIES including in particular smaller rural settlements.

B The options document FAILS against the principle of sustainable development as set out in the NPPF.

1. The sustainability of community needs to be correctly appraised and with regard to para. 32 of NPPF this has not taken place. In reference to settlements being "unsustainable" there is no definition of this word.

"Economic and social objectives" should acknowledge that small rural communities increasingly offer opportunities for home based working, along with diversification of agricultural and associated enterprises. Social objectives should also acknowledge that stable communities maintain social cohesion if long term residents have a vested interest in the security and maintenance of community assets such as places of worship and village halls, particularly where they are maintained and subsidized by village residents and are not a burden on the Council taxpayer.

2. Several village communities under current planning policy have no specific planning policies relating to them so the requirements to access the relevant economic social and environmental objectives has plainly not taken place.

3. The plan has not responded for "all communities" as required under para. 91/92 of NPPF. This section of the NPPF promotes community cohesion and "safe communities" and support of local strategies to improve social and cultural wellbeing "for all sections of the community". Currently there is no such policy for several smaller village communities including the village of North Stoke.

4. Under para. 78 of NPPF reference is made to an obligation "to promote sustainable development" where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to "grow and thrive". This has not been addressed.

5 Any proposed plan should apply the Green Belt policies correctly- particularly those required under para. 145 of the NPPF, in particular paras. f, c and e (which specifically refers to allowing limited infilling)

6. Limited and controlled development in smaller villages would allow some smaller dwellings to be extended (in a sympathetic way in terms of method and design) which would prevent younger families moving out of the villages to seek larger accommodation and would potentially free up larger dwellings where

they are occupied by elderly residents. In addition limited infilling would be in compliance with the NPPF directives, have a positive effect on attracting younger occupiers and offer options of downsizing to longer term residents wishing to maintain their contribution to the community. The sense of place would be strengthened and have a positive effect on the sense of community.

## NORTH STOKE

North Stoke is a small village community with 23 dwellings within the historic village boundary, together with a dozen outlying residential dwellings . One large working commercial farm of over 400 acres is centred in the village and some smaller agricultural holdings along with 60 acres of woodland make up the balance of the land within the parish boundary along with parts of Lansdown Golf course and Bath racecourse.

The village contains St Martins Norman church and a Village Hall both of which are maintained by village residents. The church has a weekly service and the hall is used regularly for village functions and events and utilized by families for private functions throughout the year. Every first Friday of the month there is a social at the Village Hall.

There is no Council precept. Village residents regularly pick up litter and help maintain drain gulleys. The burial plots in St Martins church are utilized by community residents.

Recently in 2017 the village raised over £5000 (including discretionary grants of £1500 from Ward Councillors' budgets) for major improvements to the Village Hall which is run by a committee on behalf of Trustees

## IMPACT OF PLANNING POLICIES – THE PAST 20 YEARS

The overall impact of planning policies has been to “freeze the village in aspic”.

1. Repeated preapp and applications for extensions to dwellings and infill sites have been refused.
2. Several instances of preapp direction have resulted in young couples leaving the village due to their inability to extend smaller dwellings.
3. Specific refusals of planning permission include (a) two applications for farm manager's house (with an agricultural occupancy condition) took away the opportunity for the most critical person (on a day to day basis the eyes and ears of the community) to reside within the village and (b) refusal of an application by a resident who had lived in the village for over 50 years on an 'infill plot '
4. Two smaller dwellings which were the subject of negative pre-app consultations have been occupied as holiday accommodation. This results in no contribution to village cohesion or “sustainability”.

5. Residents have discovered over the past 20 years that retrospective consents have always been approved following building conversion, change of use or extension works which have been completed (without due process of planning applications ) notwithstanding the fact that had relevant applications been made they would have been refused due to the failure of the Planning system and the ' freezing of the village in aspic ' by the repeated application of policies which should have had regard to the NPPF guidelines  
Building Regulations approval seem to bear no relation as to whether planning permission was ever granted or applied for. This further encourages the reliance on retrospective consents. On street parking is thereby increased and access issues are exacerbated.

## VILLAGE POTENTIAL

There exists opportunities for the community to support

- (a) limited infill opportunities on plots within the village settlement .
- (b) encouragement of sensitive but well designed additions to existing dwellings for growing families avoiding turnover of residents.

These infill plots would

- (a) provide an opportunity for the farm manager for example to take up residence in the village,
- (b) provide an opportunity to alleviate unsightly on street parking on pavements by provision of off street parking,
- (c) provide compliance with NPPF para.145,
- (d) encourage a mix of age groups within the village,
- (e) assist in sustaining and enhancing the community assets i.e. the village hall, church and also the woodland trust land, and
- (f) provide opportunities for existing residents to downsize from their larger dwelling and free up space for larger families.

## THE IMPACT OF A REVISION OF RURAL POLICIES

1. An increased confidence in the planning powers of BANES.
2. A reduction of unauthorized developments and retrospective planning consents being granted.
3. Opportunities for limited infill plots could maintain and enhance the character of the village without compromising the openness of the Green Belt (re para. 140 of NPPF ).
4. Provision of access to parking spaces would reduce on street parking (much of which currently limits accessibility for wider agricultural vehicles) and enhance visual amenity.
5. Increased social mix of ages and a wider sustainability to the village community and its community assets .

## REQUEST AND RECOMMENDATION

I request the following policy adoption based on a response to the requirements of the NPPF and the experience of planning policies which have been pursued in rural villages such as North Stoke over the past 20 years

1 Within rural villages of the plan area which are not identified for growth limited infilling or minor extensions to dwellings within villages will be permitted in line with the requirements of the NPPF. Large single dwellings should not be permitted without a demonstration of very special circumstances.

2 Preference should be given to proposals that demonstrate positive enhancements for the social and environmental well-being of such rural villages by allowing local residents to remain part of the community but live within accommodation that better fits their needs or which encourages younger and less affluent members of the community to remain in smaller, less expensive properties.

JOHN QUINLAN

North Stoke resident (and former Chair of North Stoke Parish Meeting)

THIS OPTIONS DOCUMENT AT 1.31 CLAIMS TO 'FOCUS ON THE ISSUES WHICH NEED REVIEW OR SIGNIFICANT CHANGE WITHIN THE LOCAL PLAN.

ON THIS POINT I SUBMIT AS FOLLOWS :

A The option document FAILS to provide a balance between economic social and environmental considerations FOR ALL COMMUNITIES including in particular smaller rural settlements.

B The options document FAILS against the principle of sustainable development as set out in the NPPF.

1. The sustainability of community needs to be correctly appraised and with regard to para. 32 of NPPF this has not taken place. In reference to settlements being "unsustainable" there is no definition of this word.

"Economic and social objectives" should acknowledge that small rural communities increasingly offer opportunities for home based working, along with diversification of agricultural and associated enterprises. Social objectives should also acknowledge that stable communities maintain social cohesion if long term residents have a vested interest in the security and maintenance of community assets such as places of worship and village halls, particularly where they are maintained and subsidized by village residents and are not a burden on the Council taxpayer.

2. Several village communities under current planning policy have no specific planning policies relating to them so the requirements to access the relevant economic social and environmental objectives has plainly not taken place.

3. The plan has not responded for "all communities" as required under para. 91/92 of NPPF. This section of the NPPF promotes community cohesion and "safe communities" and support of local strategies to improve social and cultural wellbeing "for all sections of the community". Currently there is no such policy for several smaller village communities including the village of North Stoke.

4. Under para. 78 of NPPF reference is made to an obligation "to promote sustainable development" where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to "grow and thrive". This has not been addressed.

5 Any proposed plan should apply the Green Belt policies correctly- particularly those required under para. 145 of the NPPF, in particular paras. f, c and e (which specifically refers to allowing limited infilling)

6. Limited and controlled development in smaller villages would allow some smaller dwellings to be extended (in a sympathetic way in terms of method and design) which would prevent younger families moving out of the villages to seek larger accommodation and would potentially free up larger dwellings where

they are occupied by elderly residents. In addition limited infilling would be in compliance with the NPPF directives, have a positive effect on attracting younger occupiers and offer options of downsizing to longer term residents wishing to maintain their contribution to the community. The sense of place would be strengthened and have a positive effect on the sense of community.

## NORTH STOKE

North Stoke is a small village community with 23 dwellings within the historic village boundary, together with a dozen outlying residential dwellings . One large working commercial farm of over 400 acres is centred in the village and some smaller agricultural holdings along with 60 acres of woodland make up the balance of the land within the parish boundary along with parts of Lansdown Golf course and Bath racecourse.

The village contains St Martins Norman church and a Village Hall both of which are maintained by village residents. The church has a weekly service and the hall is used regularly for village functions and events and utilized by families for private functions throughout the year. Every first Friday of the month there is a social at the Village Hall.

There is no Council precept. Village residents regularly pick up litter and help maintain drain gulleys. The burial plots in St Martins church are utilized by community residents.

Recently in 2017 the village raised over £5000 (including discretionary grants of £1500 from Ward Councillors' budgets) for major improvements to the Village Hall which is run by a committee on behalf of Trustees

## IMPACT OF PLANNING POLICIES – THE PAST 20 YEARS

The overall impact of planning policies has been to “freeze the village in aspic”.

1. Repeated preapp and applications for extensions to dwellings and infill sites have been refused.
2. Several instances of preapp direction have resulted in young couples leaving the village due to their inability to extend smaller dwellings.
3. Specific refusals of planning permission include (a) two applications for farm manager's house (with an agricultural occupancy condition) took away the opportunity for the most critical person (on a day to day basis the eyes and ears of the community) to reside within the village and (b) refusal of an application by a resident who had lived in the village for over 50 years on an 'infill plot '
4. Two smaller dwellings which were the subject of negative pre-app consultations have been occupied as holiday accommodation. This results in no contribution to village cohesion or “sustainability”.

5. Residents have discovered over the past 20 years that retrospective consents have always been approved following building conversion, change of use or extension works which have been completed (without due process of planning applications ) notwithstanding the fact that had relevant applications been made they would have been refused due to the failure of the Planning system and the ' freezing of the village in aspic ' by the repeated application of policies which should have had regard to the NPPF guidelines Building Regulations approval seem to bear no relation as to whether planning permission was ever granted or applied for. This further encourages the reliance on retrospective consents. On street parking is thereby increased and access issues are exacerbated.

## VILLAGE POTENTIAL

There exists opportunities for the community to support

- (a) limited infill opportunities on plots within the village settlement .
- (b) encouragement of sensitive but well designed additions to existing dwellings for growing families avoiding turnover of residents.

These infill plots would

- (a) provide an opportunity for the farm manager for example to take up residence in the village,
- (b) provide an opportunity to alleviate unsightly on street parking on pavements by provision of off street parking,
- (c) provide compliance with NPPF para.145,
- (d) encourage a mix of age groups within the village,
- (e) assist in sustaining and enhancing the community assets i.e. the village hall, church and also the woodland trust land, and
- (f) provide opportunities for existing residents to downsize from their larger dwelling and free up space for larger families.

## THE IMPACT OF A REVISION OF RURAL POLICIES

1. An increased confidence in the planning powers of BANES.
2. A reduction of unauthorized developments and retrospective planning consents being granted.
3. Opportunities for limited infill plots could maintain and enhance the character of the village without compromising the openness of the Green Belt (re para. 140 of NPPF ).
4. Provision of access to parking spaces would reduce on street parking (much of which currently limits accessibility for wider agricultural vehicles) and enhance visual amenity.
5. Increased social mix of ages and a wider sustainability to the village community and its community assets .

## REQUEST AND RECOMMENDATION

I request the following policy adoption based on a response to the requirements of the NPPF and the experience of planning policies which have been pursued in rural villages such as North Stoke over the past 20 years

1 Within rural villages of the plan area which are not identified for growth limited infilling or minor extensions to dwellings within villages will be permitted in line with the requirements of the NPPF. Large single dwellings should not be permitted without a demonstration of very special circumstances.

2 Preference should be given to proposals that demonstrate positive enhancements for the social and environmental well-being of such rural villages by allowing local residents to remain part of the community but live within accommodation that better fits their needs or which encourages younger and less affluent members of the community to remain in smaller, less expensive properties.

JOHN QUINLAN

North Stoke resident (and former Chair of North Stoke Parish Meeting)



**From:** Clare Quinlan [REDACTED]  
**Sent:** 07 January 2019 21:50  
**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.

Clare Quinlan



--

Sent from my iPhone

**From:** Patrick Quinlan [REDACTED]  
**Sent:** 07 January 2019 23:08  
**To:** Local Plan  
**Subject:** Draft Local Plan Consultation

**Categories:** Green Category

Dear Sir, Madam,

I'm writing to support and comment on the following:

DM8. Support the Council's proposal in promoting "micro housing" near sustainable transport and amenity infrastructure and should not only be confined within Bath City Centre. Consideration should also be given for co-living schemes (adapting existing buildings and new build) which is shown to be an attractive living format for recently qualified students and retain this talent and growth within the District.

DM5. Proactively engage in facilitating single plots for self-builders and take into proposals that will enhance the local community and character of the area for plots that are located within traditionally restrictive land designations (e.g AONB, Green Belt). Self builders who are making applications on previously developed land on AONB and or Green Belt land that is no longer physically visible should not be precluded in the reinstatement of the original structures and buildings.

The option document fails to provide a balance between economic social and environmental considerations for all communities including in particular smaller rural settlements. The options document fails against the principle of sustainable development as set out in the NPPF. Preference should be given to proposals by self builders that demonstrate positive enhancements for the social and environmental well-being in rural communities and villages.

DM17 / H2. 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.

BTH4. Any application for purpose-built student accommodation (PBSA) within the HMO SPD Stage 1 test 'density map' ('red zone') will be refused.

DM15 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; 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.

BTH2 / DM11. I approve of the site-specific development policy for Wansdyke Business Centre as proposed by John Branston on the 14th December.

Regards,

Patrick Quinlan



[REDACTED]

---

**Sent:** 08 January 2019 13:29  
**To:** Local Plan  
**Cc:** Kaoru Jacques; Alice Barnes  
**Subject:** FW: B&NES Local Plan Consultation

**Categories:** Green Category

Local Plan comments from Radstock TC. I have acknowledged these

George

---

**From:** Nicola Duke [REDACTED]  
**Sent:** 08 January 2019 13:25  
**To:** George Blanchard  
**Cc:** Diane Abbott; Sharon May  
**Subject:** B&NES Local Plan Consultation

Hello George

I hope this finds you well. Happy New Year.

The Members of the Town Council's Planning and Local Development Committee met this morning and considered their response to the Local Plan consultation. I copy their comments for you below:

Firstly, it was agreed to ask B&NES to refer to previously submitted HELAA assessment work which provided the evidence base for the Committee's comments on the Local Plan.

Members discussed the sites identified for development in Radstock and objected to their inclusion *until and unless* appropriate infrastructure was in place to support it. In terms of that infrastructure members asked B&NES to note the following:

- There is a lack of appropriate and adequate infrastructure to support further development in terms of highways, transport and local employment
- There is a demonstrated need for a regular direct bus service from Frome through the Somer Valley to High Littleton for connection to Bristol and Wells
- There is no mention in the Plan of the planned railway line from Radstock to Frome

Overall, members felt that Radstock was under represented in the Local Plan and asked for this to be reviewed. References to Radstock were felt to be generic in nature and more detail was requested. The Committee offered to assist B&NES in providing this if this would be useful/appropriate.

Please do not hesitate to contact me if you require any further information,

Kind regards

**Nicola Duke B.A (Hons), PLSCC  
Town Clerk**

**Radstock Town Council**  
Leigh House  
1 Wells Road  
Radstock  
BA3 3RN

Tel: 01761 437962  
Fax: 01761 431129

\*\*\*\*\*

The views and comments expressed in this email are confidential to the recipients and should not be passed on to others without permission. This email message does not necessarily express the views of Radstock Town Council and should be considered personal unless there is a specific statement to the contrary.

\*\*\*\*\*

**From:** Jackie Appbow [REDACTED]  
**Sent:** 05 January 2019 15:35  
**To:** Local Plan  
**Subject:** The Joint Spacial Orbital Ring Road - Whitchurch Lane  
**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 and 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.

Additional to this is that Callington Road, leading to Airport Road, was widened many years ago to take on the proposed ring road traffic, and there is no reason for this not to be used as the connection.

Please keep me updated with situation.

Mrs J Rainbow



Virus-free. [www.avg.com](http://www.avg.com)

**From:** Richard Daone  
**Sent:** 07 January 2019 16:32  
**To:** Local Plan; Highway Development  
**Cc:** Claire Cornelius  
**Subject:** FW: CRM Request

**Categories:** Green Category

Please log the email below as comments on the Local Plan and Strategic Transport (OAR) consultations. I will also respond to some of the process points raised (I will copy you in Claire).

Regards  
Richard Daone  
Deputy Head of Planning (Policy)  
Bath & North East Somerset Council  
Email: [richard\\_daone@bathnes.gov.uk](mailto:richard_daone@bathnes.gov.uk)  
Telephone: 01225 477546 or Mobile: 07977228100

*As part of the planning process we collect and publish personal information, please see our corporate privacy notice: [www.bathnes.gov.uk/council-privacy-notice](http://www.bathnes.gov.uk/council-privacy-notice).*



Royal Town Planning Institute's (RTPI) Award for Excellence in Plan Making Practice 2018 - Finalist

Bath and North East Somerset - *The place to live, work and visit*

---

**From:** Amanda Monelle  
**Sent:** 07 January 2019 09:20  
**To:** Richard Daone  
**Subject:** CRM Request

Richard

I have received the following, not sure whether you feel this is a representative to the consultation or if you feel a fuller response is required.

CP-33231 2019-01-05 15:25 2019-01-26 New Stage 1 Planning / Building Control  
The South East Bristol and Whitchurch Transport Package - there has been insufficient consultation and conversations with the residents of Whitchurch and Bristol, and there are still people who will be affected by this package who are unaware. Has Bristol City Council (BCC) given YOU been given all the information about the plans for Whitchurch Lane? Opinion has not been sought and people in the area have not been kept informed of the situation. This package will increase the already high pollution levels in the area, including Bridge Farm Primary School, have detrimental affect on peoples health. No serious thought has been given to the demands which will be made on doctors surgeries and schools in the area if the proposed houses are built, nor that the traffic will be made heavier by something like 5,000 extra cars being on the roads in the Whitchurch area.



I would like to see more consultation with the people of Whitchurch, more information supplied without relying on accidental discovery; not everyone has a local paper, free paper, etc. People need to be told in a more public way. I would like to see the consultation period extended from 7th January, and I would like to see those who are in the planning actually walking around the area to see the impact. I would also like to know why BANES is putting their housing problem onto Bristol City Council, including waste collection, but will not be donating the proposal council tax to Bristol.

Mrs Jackie Rainbow



Regards

Mandy Monelle,  
Management Support Officer  
Development & Public Protection  
Bath and North East Somerset Council  
Tel. 01225 477702  
Email: [amanda\\_monelle@bathnes.gov.uk](mailto:amanda_monelle@bathnes.gov.uk)  
[www.bathnes.gov.uk](http://www.bathnes.gov.uk)  
[www.twitter.com/bathnes](https://www.twitter.com/bathnes)

Bath and North East Somerset – *The place to live, work and visit*



Royal Town Planning Institute's (RTPI) Award for Excellence in Plan Making Practice 2018 - Commended

[REDACTED]

---

**From:** Nick Rainbow [REDACTED]  
**Sent:** 07 January 2019 18:14  
**To:** Local Plan  
**Cc:** [REDACTED]  
**Subject:** Objection to South Bristol Link Road and Whitchurch Village Expansion

**Categories:** Green Category

Dear Sirs

I wish to register my objection to the proposed development for a new road and the building of 2500 new homes in Whitchurch Village and surrounding area. My objections are as follows

1. The Whitchurch village development proposals are unsustainable, there are more sustainable locations that should be considered.
2. The additional traffic, congestion and pollution on Whitchurch lane and surround roads would be significant and server and the effect would cause a considerable negative impact on local residents and Bridge farm School.
3. The proposals are for unsustainable development within the Greenbelt and an are of significant flooding
4. The effect on Junction and capacity of Whitchurch land have not been effectively measured or considered as part of the supporting documents and the transport studies have errors and are missing key information.

Any new road linking Hicks Gate and the A4174 should be as previously planned via the A4 Brislington and then via Callington Road and Airport road. All of which have had land put aside for this link in previous proposals. There would be less cost and impact if the junctions at Dixon road and Callington road were re modeled plus a revised entry and exit sturcture to the retail estates between the two junctions.

In addition the 2500 proposed new houses would indeed bring with them circa 5000 plus cars, with a clear example of this happening at the latest development at Horse World where by 200 new houses have manifested into nearly 400 cars all of which are having to park on the surrounding roads.

This also leads to the ability of Saltwell Vaiduct to be able to maintain an increased level of traffic as the most direct route into the city is via Wells road and not via the proposed joining of the new road to the A4174 at Hartcliffe roundabout where by the current traffic light phasing can take 90 seconds to circumnavigate what is 300 meter of road space.

None of the current plans are showing any traffic management proposals and I and the community fear this is likely to have a further detrimental effect on any traffic routed via Whitchurch lane from either Four Acres or Washingpound junctions.

I am happy to discuss any of my objections in detail

Yours Sincerely

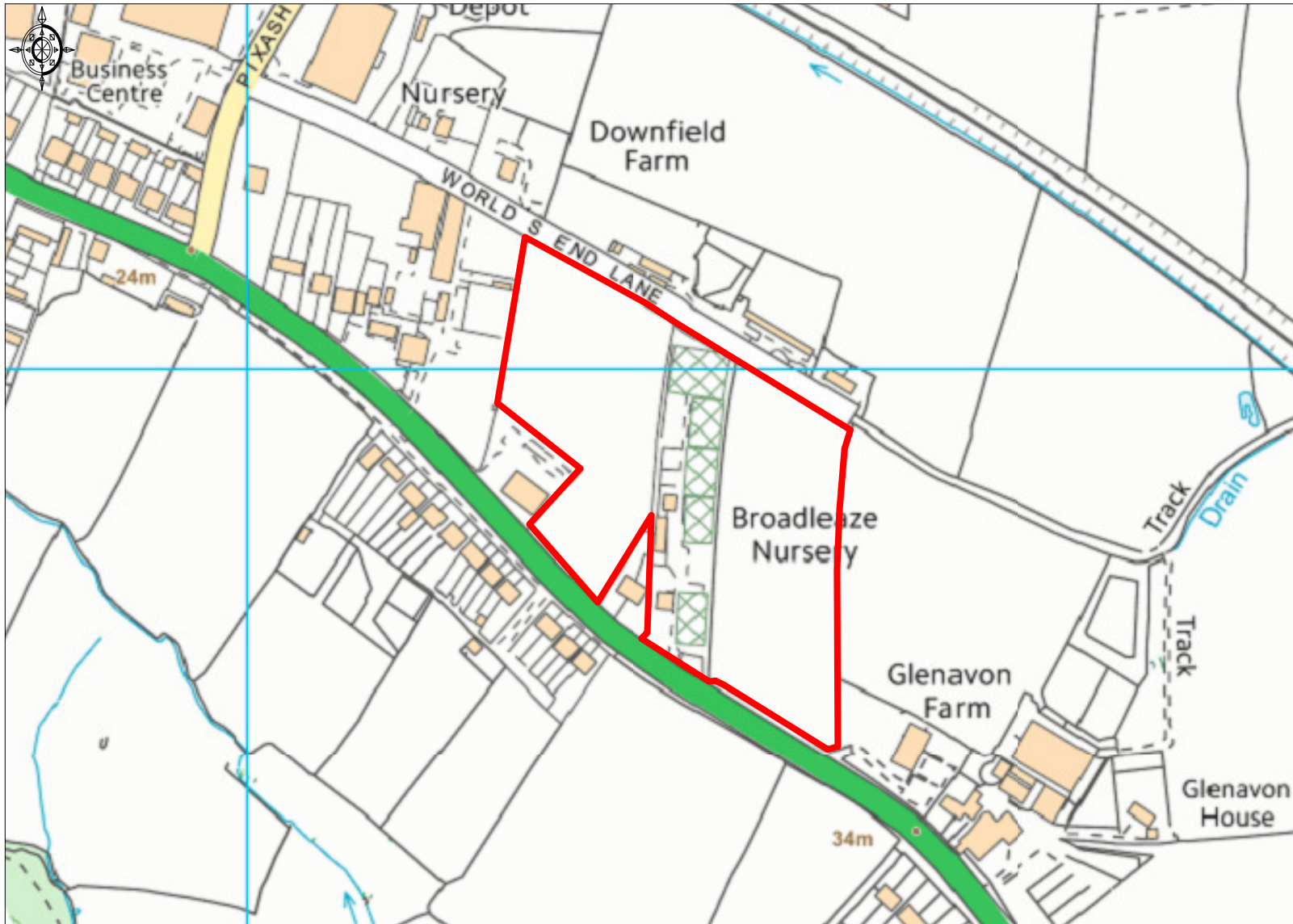
Nick Rainbow  
[REDACTED]



Virus-free. [www.avg.com](http://www.avg.com)



Ordnance Survey © Crown Copyright 2018. All rights reserved. Licence number 100022432. Plotted Scale - 1:3971



Ordnance Survey © Crown Copyright 2018. All rights reserved. Licence number 100022432. Plotted Scale - 1:3971

## Paul Rixon

---

**From:** terry Reakes <[REDACTED]>  
**Sent:** 22 December 2018 13:59  
**To:** Local Plan  
**Subject:** Ref: Bath & North East Somerset Council Local Plan, 2016-2036 Draft Housing & Economic Land Availability Assessment

**Categories:** Green Category

### **Ref: Bath & North East Somerset Council Local Plan, 2016-2036 Draft Housing & Economic Land Availability Assessment**

I believe sites RAD25 and RAD 26 as shown in the new Local Plan 2016-2036 currently under consultation are not suitable for development both these areas are outside the Housing Development Boundary. According to BANES Core Strategy & Placemaking Plan, 'house development will be acceptable within the HDB and residential development outside the HDB will ONLY be acceptable if identified in an adopted Neighbourhood Plan. Radstock Town Council has not developed a Neighbourhood Plan Also I believe any development on these sites would be contrary BANES Green Infrastructure Strategy.as they are green fields when there are potential brown field sites within the Somer Valley area that should be prioritised.

Please note following comments on the suitability of **RAD25 & RAD26** for development within the land availability assessment

#### **RAD25 Suitability not proven**

H, E, T, L Potential area of prehistoric burials or early settlement activity. Prior to any allocation, further work required. Potential ecology interests incl. bats. Potential issue re use of Braysdown Lane to reach Peasedown and bath (bypassing Radstock town centre. Capacity of Manor Road to be tested. The protected trees and mature coniferous planting form locally distinctive landscape features whose removal would be detrimental to landscape and visual character and quality would not conserve or enhance the local distinctiveness of the landscape. Therefore while the site could accommodate limited development this would need to include the adaptive reuse of the listed buildings; the preservation of their setting; the retention of the PROW route across the site; and the retention of existing site planting to soften the visual impact of any development and prevent new built form becoming a prominent skyline feature.

#### **RAD26 Suitability not proven**

H, T, L Potential area of prehistoric burials or early settlement activity. Prior to any allocation, further work required. Vehicular access appears possible from Old Road, however Old Road will require significant upgrading. Access through RAD 24 might be possible, but the impact on Manor Road is unlikely to be acceptable. Consideration to be given to the capacity and road safety of Manor Road and Old Road, as well as the individual and cumulative effects on the junction of Frome Road/Knobsbury Lane/Manor Road, impact on the centre of Radstock, together with the cumulative effect of the other

#### **Draft HELAA 2018 – Bath & North East Somerset Council**

Page 103 Site ref Overall suitability assessment Reasoning for assessment

Reasoning: further detail significant potential development sites in the area. Site is likely to have significant impact upon the highway network; particularly the junction of A362 / Manor Rd. Site is not advantageously located with regard to Radstock town centre – car dependent development likely. Some limited development could be acceptable in landscape terms with appropriate mitigation.

**Draft Helaa 2018** H, E, T, L. The protected trees and mature coniferous planting form locally distinctive landscape features whose removal would be detrimental to landscape and visual character and quality would not conserve or enhance the local distinctiveness of the landscape. Therefore. It is abundantly clear at this stage of the HELAA, the sites that have been assessed as either unsuitable for development or that the site's suitability for development has not been proven. I would draw attention to a press report as far back as 2011:-

#### **Councils 'to have final say' on Greenfield sites under planning proposals**

The National Trust fear for Greenfield sites under the government's latest planning document. The shake-up of England's planning laws is likely to result in more development on Greenfield sites, but this will not happen without the approval of local communities, according to the government department responsible for the reforms. The national planning policy framework, a consultation document published three weeks ago, has [provoked consternation](#) in the ranks of the National Trust and the Council for the Protection of Rural England. The campaign groups claim the framework dispenses with the previous government's emphasis that developers should build primarily on brownfield, urban sites rather than Greenfield sites at the edge of the countryside. There have been claims this will result in developers "cherry-picking" Greenfield sites as local authorities are instructed to develop ambitious five-year housebuilding plans. But [Greg Clark](#), the minister responsible for planning, said the framework ensured there would be no Greenfield development without the sanction of local authorities. "Local communities are the best judges of what is important in their area," Clark said.

In 2015 Bath & North East Somerset Council refused an application\* to build on a Green field site at Haydon Radstock site it was refused as it was not in accordance with the development plan. There was also strong local opposition to this proposed development

**\*Bath & North East Somerset Council (RFOUTZ).**

Please read the notes that accompany this decision notice.

**Town and Country Planning Act 1990  
NOTIFICATION OF DECISION**

Application Type: Outline Application

Address to which the proposal relates: Application No: 15/01075/OUT Parcel 7800 Grove Wood Road Haydon Radstock

Description of Proposal: Outline application for residential development, comprising up to 100 dwellings with access off Kilmersdon Road (with all matters reserved).

Application submitted by: The Silverwood Partnership

The above development is REFUSED in accordance with the application, plans and drawings submitted by you for the reason(s) set out below:

1 The proposed development, being located outside the Housing Development Boundary for Norton Radstock and on a green field site, is not considered to be in accordance with the development plan; would represent unsustainable development as it would exacerbate the imbalance between housing and employment within the Somer Valley area leading to future occupiers of the site being reliant on private car journeys to access employment; and would have a harmful impact on landscape character with some loss of views. This is contrary to Policies HG.4, HG.10 and NE.1 of the Bath and North East Local Plan, including minerals and waste policies, adopted October 2007 and Policies DW.1, SV.1 and CP.9 of the Bath & North East Somerset Core Strategy (July 2014) and the National Planning Policy Framework.

2 The submitted application, due to a lack of information, has failed to adequately demonstrate that the proposed development could be satisfactorily accommodated on the site whilst also providing a 25m buffer zone around the Kilmersdon Road Quarry Site of Special Scientific Interest (SSSI) and which could lead to a detrimental impact on the SSSI or the character and a corresponding detrimental impact on the appearance of the surrounding area. This is contrary to Policies NE.8 and D4 of the Bath & North East Somerset Core Strategy (July 2014) and the National Planning Policy Framework.

**FOOTNOTE:**

This decision relates to drawing no's 13438/02, 10704/01, 01 and Location Plan.

**DECISION TAKING STATEMENT:**

In determining this application the Local Planning Authority considers it has complied with the aims of paragraphs 186 and 187 of the National Planning Policy Framework. The submitted application was unacceptable for the stated reasons and the applicant was advised that the application was to be recommended for refusal. Despite this the applicant chose not to withdraw the application and having regard to the need to avoid unnecessary delay the Local Planning Authority moved forward and issued its decision.

**Radstock Town Council** also strongly objected to building on this **Green Field** site for the following reasons:-

**Radstock Town Council:** Object on the following grounds: Outside the Housing Development Boundary 2. Substantially change the character of the hamlet of Haydon 3. Increase in traffic congestion 4. Add to current pressures on drainage and water infrastructure 5. Add to the pressure on education and health 6. Unsustainable development 7. Contrary to Policy RA2 and SV1 of the Core Strategy, Para 32 and 112 of the NPPF Local Representations: A total of 168 representations have been received. Of these 165 are objections and 3 give general comments raising the following concerns: Loss of wildlife habitat and impact on the SSSI nearby and Wellow Brook SNCI 2. Impact on highway safety particularly around local schools, including cumulative impact with other developments in Radstock 3. Unsustainable location, increase in commuting Impact on Haydon's character and loss of separation with Radstock 5. Risk of surface water run off causing flooding 6. Loss of agricultural land 7. Impact on local services and existing community, doctors, schools, bus services etc. 8. Impact on sewers and infrastructure 9. Lack of employment in Haydon and increasing the imbalance of housing and employment that currently exists in the Somer Valley 10. Contrary to Policies in the Local Plan and Core Strategy as it is outside the Housing Development Boundary 11. Lack of community engagement 12. The question of whether this is EIA development should be revisited to take account of the cumulative development in Radstock. 13. Impact on heritage such as archaeology

**Policies/Legislation:** referred too relating to the application

The Core Strategy for Bath and North East Somerset was formally adopted by the Council on 10th July 2014. The Core Strategy now forms part of the statutory Development Plan and will be given full weight in the determination of planning applications. The Council's Development Plan now comprises: Bath & North East Somerset Core Strategy (July 2014)

Saved Policies from the Bath & North East Somerset Local Plan (2007) o Joint Waste Core Strategy The following policies of the Core Strategy are relevant to the determination of this application: DW1: District wide spatial strategy o SV1: Somer Valley Spatial Strategy o CP2: Sustainable construction o CP6: Environmental quality o CP7: Green Infrastructure o CP9: Affordable housing o CP10: Housing mix o CP13: Infrastructure provision The following saved policies of the Bath and North East Local Plan, including minerals and waste policies, adopted October 2007 are also relevant to the determination of this application. D.2: General design and public realm considerations o D.4: Townscape considerations o IMP.1: Planning obligations o ES.5: Foul and surface water drainage o ES.15: Contaminated land o HG.4: Residential development in the urban areas and R.1 settlements o HG.10: Housing outside settlements (agricultural and other essential dwellings) o SR.3: Provision of recreational facilities to meet the needs of new developments o NE.1 Landscape character o NE.4: Trees and woodland conservation o NE.8: Impact on a SSSI o NE.9: Locally important wildlife sites o NE.10: Nationally important species and habitats o NE.11: Locally important species and their habitats o NE.12: Natural features: retention, new provision and management o T.1: Overarching access policy.

#### **Officer Assessment:**

Environmental Impact Assessment: The development has been screened under the Town and Country Planning (Environmental Impact Assessment) (Amendment) Regulations 2015 and it has been concluded that the proposed development of 100 dwellings on this site would not have significant effects on the environment and an Environmental Statement is not required. Principle of Residential Development The site lies to the northeast of Haydon and falls outside of Norton-Radstock Housing development boundary (HDB). New residential development comprising open market housing is contrary to policies HG.4 and HG.10 of the Local Plan as well as Policy DW1 and SV1 of the Core Strategy. The site is located outside the HDB for Norton-Radstock and although the Core Strategy clearly states that the boundary will be reviewed as part of the Placemaking Process, this site has not been identified within the Draft Placemaking Plan as being necessary to meet the relevant housing requirements for the District. Furthermore, in the Somer Valley, there is no expectation that the review of HDB's will enable the development of previously unidentified **Green field** housing land supply.

In light of the above it is considered that there is no overriding need to release the site for housing development at this time. The Core Strategy also seeks to deliver housing growth in the more sustainable parts of the district where there are other facilities and services including jobs. The supporting text to Policy SV1 of the Core Strategy identifies that whilst there are significant housing commitments within the Somer Valley this is not matched by the capacity to create new jobs, which is considered to be limited. In this area of the District there is a real risk that the release of further land for housing will exacerbate the imbalance between

housing and employment within the Somer Valley area, as identified by the Core Strategy Inspector, with high levels of out-commuting. At a strategic level, this issue raises concern about the location and phasing of the overall level of housing growth in sustainable locations however this also presents a specific concern in relation to the living patterns of potential future occupiers of the development proposed under the current application.

### **My conclusion**

Therefore in the light of the council's decision and officer assessment to refuse the above application for the reasons stated it is abundantly clear sites RAD25 & RAD 26 have much in common with **Application No: 15/01075/OUT** as primarily they are **Green Field** sites thus should not be available for speculative development. Therefore, I would suggest that rather than allow carpeting bombing urban areas with a high density housing Bath & North East Somerset Council should look more closely at the availability of brownfield sites rather than allow developers to 'cherry pick' **Green Field** site's as they cost less to develop. I recognise the need to protect the Green Belt but I am sure villages within the council area of responsibility could take a larger share of housing especially low cost, thus enabling young people not to be priced out of their villages. Additionally I do not believe building on Green Field site will solve the crisis of lack of low cost housing, because houses built on such sites usually attract a premium prices. Urban intensification is not the answer only in the most extreme circumstances should precious **Green Fields** be built on. In my opinion sites RAD25 & Rad 26 fall within such a description, thus they must be saved at all costs for posterity.

Walter (Terry) Reakes



**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		Title	Mr
First Name		First Name	Alistair
Surname		Surname	Macdonald
Job Title <i>(only if applicable)</i>		Job Title	Director
Organisation <i>(only if applicable)</i>	Redrow Homes	Organisation	Boyer
Email		Email	alistairmacdonald@boyerplanning.co.uk
Address		Address	Boyer Bristol
			160 Aztec Aztec West
			Bristol
Postcode		Postcode	BS32 4TU
Date		Date	7 January 2019

**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*

X
---

**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?** Please refer to accompanying letter  
Please use the unique reference number by each policy approach/option.

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

*Please refer to accompanying letter.*

*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**

7 January 2019  
Our Ref: BRS.18.9003

160 Aztec  
Aztec West  
Bristol  
BS32 4UB

Planning Policy  
Bath & North East Somerset Council  
PO Box 5006  
Bath  
BA1 1JG

T 0117 428 7970

Dear Sir / Madam

## Re: Bath & North East Somerset Local Plan 2016-2036 – Options Consultation Winter 2018

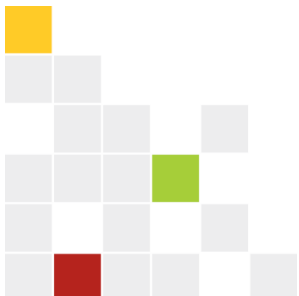
### Executive Summary

On behalf of our client, Redrow Homes Ltd, Boyer is instructed to submit representations in response to the Bath & North East Somerset (B&NES) Local Plan 2016-2036 Options consultation (herein referred to as Local Plan Options). The representations provide commentary on the draft policy options and promote land to the west of the A37, Whitchurch for consideration as an allocation for residential development (Site Location Plan attached at **Appendix 1**).

Our comments are intended to be helpful to B&NES in the production of the emerging plan, key points we seek to highlight are that:

- B&NES will need to plan positively in response to the strategic context and housing requirements set by the West of England Joint Spatial Plan (JSP), this includes allowing flexibility for contingency as JSP housing targets are yet to be tested at examination and are more likely to increase than decrease (as indicated by an Industry Consortium that Redrow form part of).
- We support the principle of a Strategic Development Location (SDL) at Whitchurch, however, Green Belt review should not be limited to catering for Strategic growth and should also be considered for non-strategic growth. Within B&NES much of the Green Belt land is more sustainably located than the non-Green Belt land.
- Accordingly, the Council should carry out a thorough Green Belt review given the opportunity for both strategic and non-strategic development in Whitchurch the context of the SDL and proposed supporting infrastructure.
- We promote land west of the A37, Whitchurch which is approximately 2.7ha in area and is capable of delivering circa 75 dwellings in the earlier stages of the plan period. The site represents a suitable and sustainable development opportunity that would support the objectives and vision of the emerging Local Plan and thus should be considered for allocation and release from the Green Belt.

An analysis of the site is provided below and further details are included in **Appendix 2** (HELAA



form). We provide a summary of the strategic context followed by our comments on the Local Plan Options. We have commented on the parallel Strategic Transport Studies Consultation separately.

### **Site Promotion – Land West of A37 Whitchurch**

On behalf of Redrow Homes Ltd, land is promoted for consideration as an allocation in the emerging Local Plan. The land (identified in **Appendix 1**) is situated immediately west of the A37 (Bristol Road). This land is promoted as a site that is available now, and being capable of achieving a deliverable and sustainable development as well as providing significant benefits for Whitchurch. Its allocation would also be supported by the objectives of the emerging Local Plan and West of England Joint Spatial Plan (JSP) which both identify Whitchurch as a location for significant growth including as a Strategic Development Location (SDL)

### **Site and Surroundings**

The site is currently laid to pasture and comprises approximately 2.7ha of land and is irregular in shape with a slight north facing slope. The site is well contained within existing boundaries defined by trees and hedgerows. The land is bound to the east by the A37 (Bristol Road) and residential development on the opposite side of the road, to the north by residential development, to the south by a field and sports pitches, including Bristol Barbarians Rugby Club and to the west by fields.

The site is located within the boundary of Bath and North East Somerset Council (B&NES), and lies within the parish of Whitchurch. The site lies outside the Housing Development Boundary of Whitchurch and within the Green Belt,

The Environment Agency's Flood Map for Planning shows that the appraisal site, and the wider locality of Whitchurch, is situated within Flood Zone 1. This means that there is a low probability of flooding at this location, with less than 1 in 1,000 annual probability of river or sea flooding.

There are no listed buildings located at the appraisal site, and Whitchurch does not contain a Conservation Area. However, within a 0.5km radius of the site, there are a number of listed buildings including the Grade II\* Church of St Nicholas being located approximately 0.27km to the north.

Additionally, the Scheduled Ancient Monument of Maes Knoll is situated approximately 1.6 km south west of the appraisal site and Queen Charlton Conservation Area is located approximately 1.85 km east of the appraisal site.

The site is not subject to any Tree Preservation Orders.

The village of Whitchurch has a range of local amenities and is connected to the site via pedestrian footway. The northern boundary of the site is situated approximately 0.45 km south of Whitchurch Primary School, approximately 1 km south of Woodlands Academy school and nursery, and Bridge Farm Primary School is situated approximately 1km north west of the site. A large supermarket and Whitchurch Health Centre are located approximately 1.5 km north west of the site. Furthermore, Whitchurch is well connected to the city of Bristol, being on the south eastern periphery.

In terms of public transport connectivity Sleep Lane bus stop is located approximately 0.1 km south east of the site, with frequent routes to central Bristol and the village of Street.

## Technical Assessments

Our client, Redrow Homes Ltd, has assembled a project team and initial technical assessments have been carried out which confirm the suitability and deliverability of the site. The technical work has assessed:

- Ecology;
- Green Belt;
- Heritage;
- Landscape; and
- Transport and Access

This work has included a review of the Plans' evidence base and concludes that there are no overriding constraints to the development of the site. It is estimated that the site can deliver approximately 75 dwellings in the short to medium term.

Included within **Appendix 2** is a completed HELAA form.

## Summary

The site is available and initial technical investigations find that the site is suitable for residential development. The site is highly sustainable, being well connected to Whitchurch and can be delivered independently without dependence on significant infrastructure. The site could deliver circa 75 dwellings in the short to medium term and be catered for within the capacity of existing infrastructure. We would therefore encourage that the site is considered for non-strategic development allocation and release from Green Belt as it will contribute towards the objectives for sustainable growth in Whitchurch and can be achieved in the earlier phases of the plan period. The allocation of the site is therefore considered to contribute towards the robustness of the emerging plan.

## Strategic Context

The strategic context for significant growth in response to development pressures in the Bristol city region and the need for Local Plan review is set by the West of England JSP. The JSP is a strategic statutory Development Plan Document (DPD) for the West of England, being prepared jointly by Unitary Authorities of Bristol, Bath and North East Somerset, North Somerset and South Gloucestershire.

On adoption JSP, will form part of the development plan and carry full weight in the planning system and provide the higher level strategic planning policy framework for each authority's new Local Plan for the period 2016 to 2036, including the B&NES Local Plan subject to this consultation.

Whilst the JSP will not allocate new sites, it does identify new Strategic Development Locations (SDLs), including Whitchurch which will need to be brought forward as allocations through the Local Plan. New site specific allocations and policy designations in Local Plans will need to be in conformity with the JSP.

The JSP provides a target for 105,500 new homes in the Plan Period. It is Redrow's position that an objective and proper assessment of need would suggest a requirement of at least 140,000 (as outlined in more detail below).

As the JSP is yet to be examined, these figures are not fixed and are anticipated if anything to be increased rather than decreased and as such the Unitary Authorities need to consider further allocation options for flexibility.

In respect of the supply of large numbers of new homes, paragraph 72 of the NPPF (2018) states that:

*“The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:*

*a) consider the opportunities presented by existing or planned investment in infrastructure, the area’s economic potential and the scope for net environmental gains;*

*b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;*

*c) set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided;*

*d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations); and*

*e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size”.*

In accordance with the NPPF and the strategic context set by the JSP, B&NES has the opportunity to fully review distribution of growth and with specific regard to Whitchurch, there is the opportunity to appropriately deliver the significant numbers of homes required through both new settlement and significant extension.

### **Housing Numbers and Green Belt Release**

It is acknowledged within the JSP (paragraph 19 under the sub heading ‘Strategic Development Locations’) that it is not possible to accommodate sustainably all the identified growth needs entirely outside the Green Belt, and this is based on the JSPs preferred conclusion regarding OAHN.

In order to facilitate higher levels of growth to accommodate what we consider to better reflect the full OAHN, i.e. 140,000 homes, additional strategic and non-strategic growth will be required in sustainable locations, including sites located within the Green Belt.

Policy 1 of the JSP confirms that the JSP makes provision for the supply of at least 105,000 new homes over the Plan period 2016-2036, which is above the identified requirement of 102,000 homes over this period and is intended to “allow some flexibility”.

As part of the industry consortium, of which our client, Redrow Homes forms part of, we endorse the conclusions of the assessment undertaken by Barton Willmore which concludes that the full **OAHN for the West of England is a minimum of c.140,000 additional dwellings over the period 2016-2036.**

The JSP (paragraph 19 under ‘Strategic Development Locations’) acknowledges that it is not possible to accommodate sustainably all the identified growth needs entirely outside the Green Belt as the transport impacts would be so severe that they could not be fully mitigated even with substantial investment.

Given that Bristol is the prime generator of housing need within the JSP area, and the fact that the Spatial Strategy is purportedly premised on the achievement of sustainable development, the approach to selecting Whitchurch as an SDL and thus the principle of significant growth in Whitchurch is supported. This growth should not be solely dependent on strategic schemes and should also include suitable non-strategic sites.

In order to provide a positive and deliverable response to the housing requirements including any likely necessary uplift in planned housing delivery, it is acknowledged that the scale of growth proposed in the JSP cannot be entirely located outside the Green Belt. This growth should not necessarily be limited to strategic development, as a comprehensive assessment of the Green Belt is likely to identify additional sites in sustainable locations, such as Whitchurch, are also suitable for non-strategic development.

Therefore at this Options stage of the Local Plan it would be beneficial for a full review of the Green Belt to take place for both strategic and non-strategic development. Given that the housing figures are a minimum and that there is a likely possibility of them increasing, the Council should consider all suitable and available sites that can be delivered within the plan period, including Green Belt sites to allow flexibility. This includes the site being promoted on behalf of Redrow Homes which is well contained and well connected with Whitchurch and can be delivered within the early-medium term without the need for significant infrastructure. The Redrow site can therefore offer non-strategic growth complementary to that planned through the wider SDL and can be delivered ahead of the wider SDL offering earlier housing completions to be achieved.

This approach would accord with the principles of paragraph 35 of NPPF on soundness including the requirement for plans to be *positively prepared* through meeting the areas objectively assessed need including co-operation, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; and *effective*, being deliverable over the plan period.

The Landscape and Green Belt assessment commissioned by Redrow has demonstrated that the site has a very limited role in respect of the purpose and functions of the Green Belt. This position is to be further improved with the completion of the planned orbital link road which will provide a further defensible boundary. The Council should therefore consider the suitability of allocating this site, which will provide non-strategic growth in Whitchurch.

## **Comments on Local Plans Options Consultation:**

### **Vision and Spatial Priorities**

The vision and spatial priorities outlined in the options document are as follows:

#### **B&NES Vision**

*“Bath and North East Somerset will be internationally renowned as a beautifully inventive and entrepreneurial 21st century place with a strong social purpose and a spirit of wellbeing, where everyone is invited to think big – a ‘connected’ area ready to create an extraordinary legacy for future generations”.*

#### **Spatial Priority for the Local Plan**

- *Cross cutting objective: Pursue a low carbon and sustainable future in a changing climate*
- *Protect and enhance the District's natural, built and cultural environment and provide green infrastructure*
- *Facilitate a strong, productive, diverse and inclusive*
- *Meet housing needs arising from a changing and growing population*
- *Plan for development that promotes health and well being*
- *Deliver well connected places accessible by sustainable means of transport*
- *Ensure the timely and efficient provision of infrastructure to support growing communities*

We support the above vision and spatial priorities and the principle of growth in Whitchurch through the SDL and additional non-strategic growth to ‘*meet housing needs arising from a changing and growing population*’.

### **Spatial Strategy including Rural Areas**

The Local Plan 2016-2036 seeks to deliver at least 14,500 new homes in B&NES over the plan period, including at least 3,000 homes through Strategic Development Locations and at least 700 new homes through non-strategic growth. In order to achieve the delivery of new homes required a series of spatial strategy options are presented in the document. All options seek to direct non-strategic growth towards settlements that have the infrastructure to support development, of key importance is for there to be a primary school with capacity or scope for expansion. These options are outlined as follows and we provide our comments under each option followed by a summary:

#### **Spatial Strategy Options**

**SS1 Option 1.** *Focused approach avoiding the Green Belt Under this option all non-strategic growth is focused at a few key locations outside the Green Belt in the south of the District.*

The Council considers the benefit of this approach is that it could help to facilitate investment in infrastructure such as schools, health facilities, and open space. However the impact of these levels of growth on a settlement could be relatively significant with some settlements having lower level of services and facilities.



SS1 is not considered to be a sustainable strategy as the non-Green Belt locations are predominantly smaller settlements with limited services and facilities and further in distance from key employment areas of Bath and Bristol. Whilst we acknowledge that SS1 focuses on key settlements outside of the Green Belt, they are still further in distance from key employment areas than Green Belt locations and encourage further distances of travel. This is reinforced within the existing adopted Development Plan, where B&NES recognise the challenges faced for growth in the Somer Valley related to the balance between housing and economic opportunity, with a perceived difficulty in attracting economic investment in the area and high levels of out commuting due to the lack of local employment opportunities. This in addition to lesser public transport makes housing growth in the Somer Valley unsustainable leading to dependence on the private car and congestion.

**SS2 Option 2.** *More dispersed approach avoiding the Green Belt The alternate approach would be to distribute the growth across a wider (but still limited) range of settlements. This would result in fewer dwellings at each location.*

This approach would spread development across settlements included in Option 1 in addition to smaller settlements. Under this option, a greater number of dwellings would also be allowed in other non-Green Belt villages during the plan period.

Whilst SS2 may provide a more balanced approach with some modest growth to existing settlements to help support those communities the same issue persists as with SS1 in terms of distance from key employment and commercial centres. As such the strategy encourages further travel, predominantly by private car, and is considered to be unsustainable.

**SS3 Combination of locations outside and within the Green Belt** *If the quantum of development at the locations outlined above is undeliverable or found to be unsustainable, and if exceptional circumstances are demonstrated, the Draft Local Plan could identify land to be removed from the Green Belt and allocate sites for development. This approach would only be considered once all other non-Green Belt options had been fully explored and would focus on the most sustainable locations including suitable opportunities around Bath and other more sustainable Green Belt settlements but crucially, will also be dependent on primary school capacity.. Under such an option the Council would need to be able to demonstrate that directing development to these locations would clearly outweigh potential harm to the Green Belt. Given that sustainable and suitable non-Green Belt options would need to be fully utilised first the scale of any development that would be directed to Green Belt locations is not known at this stage.*

We would agree that SS3 provides the most suitable approach to delivery of non-strategic growth. The Plan requirements are for at least 700 dwellings plus scope for contingency. The Options document suggests growth should be sustainable and considers settlements where there is a primary school with capacity or with scope for expansion.

SS3 would be in accordance with the objectives of the JSP, where it is identified that it is not possible to sustainably accommodate all the identified growth needs entirely outside the Green Belt. To avoid the Green Belt as part of the growth strategy would be dependent on some highly unsustainable locations and the result in transport impacts that cannot be fully mitigated.

It is recognised in the Local Plan Options, through the designation of a SDL, that Whitchurch is an appropriate location for significant development given that it is sustainably located and within close proximity of the services and facilities of both Bristol and Bath. There is a primary school at Whitchurch with limited capacity and the proposed SDL will offer a new primary and secondary schools. Therefore there is scope for expansion in infrastructure at Whitchurch that can support both strategic and non-strategic growth.

Exceptional circumstances have therefore been recognised through the JSP in releasing Green Belt land to cater for significant growth at Whitchurch. We believe that, during the process of Green Belt review, the Council must consider in detail the opportunities for both strategic and non-strategic growth in suitable locations in Whitchurch. For instance the proposed orbital route will act as a new defensible boundary and can contain non-strategic growth in Whitchurch. Whitchurch is a highly sustainable settlement and is recognised as such in its identification as an SDL. Therefore Green Belt review in Whitchurch can help both strategic and shorter term non-strategic delivery in the more sustainable locations.

### **Existing allocations**

**SS4** refers to exiting allocations, this includes land at Whitchurch which was released from Green Belt through the Core Strategy (2004) (Policy RA5). The intentions for RA5 going forward are as follows:

*Whitchurch RA5. Land at Whitchurch Strategic Site Allocation Schemes on parts of the allocated site are under construction. Retain allocation until all schemes are complete.*

This proposal is supported in principle. The development under RA5 is near completion and provides a positive contribution to Whitchurch. This demonstrates how suitable sites have been released from the Green Belt previously and delivered in a sustainable location. An opportunity exists during Local Plan review to consider further suitable non-strategic growth and release of Green belt land in Whitchurch. The Redrow site offers an opportunity being well contained and well connected to the village.

### **Summary – Spatial Strategy**

In addition to identified strategic growth through SDLs there is a plan requirement to provide non-strategic growth of at least 700 dwellings with scope for contingency. The non-strategic growth must take place at sustainable locations and it would be unsustainable for the entirety of this non-strategic growth to take place outside of Green Belt land.

We therefore support option SS3 and would stress that Whitchurch offers the opportunity to cater for some of this non-strategic growth in addition to the SDL identified. Whitchurch is highly sustainable and includes key services and facilities including a primary school and new schools planned through the SDL. Whitchurch will require Green Belt review as the identification of site boundaries for the SDL requires a Green Belt review to be carried out in this location. This review should be comprehensive and include the identification of non-strategic development opportunities. The Redrow site presents one of these options. The site is well contained and has existing well established boundaries. The planned orbital route will only create a further defensible boundary.

## Whitchurch SDL

Whitchurch is identified as one of 12 SDLs through the JSP, which are identified for being consistent with the sustainable development objectives of the Plan. We do not object to the principle of Whitchurch as an SDL, as it presents a sustainable location that is well connected to Bristol and also Bath. However, future growth should not be overly dependent on strategic growth and should be balanced with non-strategic growth opportunities to improve the flexibility and robustness of the plan. The SDL and additional planned orbital route presents a unique opportunity for a thorough Green Belt review in Whitchurch to cater for sustainable growth required by the Local Plan and wider JSP.

### **Background and Evidence Base**

It is helpful to understand the background work and consultation that has resulted in the emergence of the SDL as presented in the Options consultation. This includes the evidence base of the JSP and also Local Plan Options subject to this consultation.

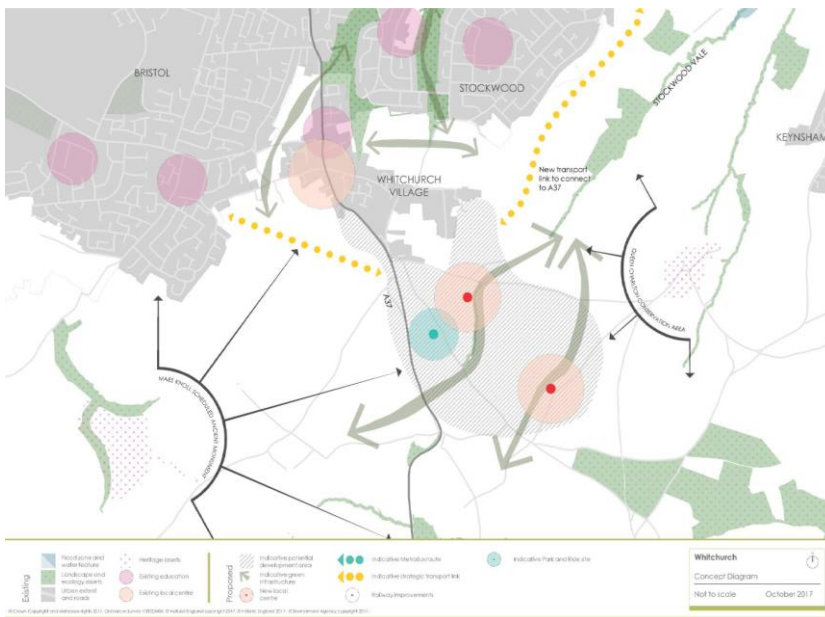
#### *Strategic Development Location Templates (November 2017)*

As part of the evidence base for the Submission version of the JSP, a series of Strategic Development Location Templates (November 2017) were issued in order to guide and further refine the assessment of the potential for development at the SDLs. In doing so, consideration was given to factors such as:

- **Location characteristics:** *Site location, approximate size, relevant planning history and designations, current land use.*
- **Suitability (constraints and opportunities):** *Strategic opportunity, site characteristics, physical & environmental constraints, existing development schemes, opportunities.*
- **Landuses, capacity, availability & viability:** *Mix of uses, employment, housing typology / density, housing capacity, availability, viability.*
- **Draft policy expectations for the location:** *Vision, housing capacity (types, typology & affordable housing) and other land-uses, access, Green infrastructure, infrastructure requirements.*
- **Barriers to delivery / critical interventions:** *Identified risks to suitability availability & achievability,*

The assessment, having considered these factors, also set out a “Concept Diagram”. The concept diagram for Whitchurch identified an “Indicative potential development area”, which whilst predominantly east of the A37 also included land immediately adjoining the western side of the A37 including the Redrow land.

The Concept Diagram for Whitchurch, taken from the JSP evidence base, is reproduced below for ease of reference:



*Extract from Appendix 1 Concept Diagram – Strategic Development Location Templates, November 2017*

Therefore at JSP strategic level, the Redrow site has been identified as being part of an indicative potential development area, this is backed by the technical work carried out by Redrow that confirms that the site is suitable and deliverable.

#### *Whitchurch Emerging Strategic Planning Framework (November 2018)*

The supporting evidence base entitled 'Whitchurch Emerging Strategic Planning Framework, Stage 1 Report (issue 08) (November 2018)' provides an overview of the high level technical work that has been completed.

The strategy appears to avoid land west of the A37 due to landscape concerns, specifically the setting of Maes Knoll. The Redrow site is well contained and scores similarly to the identified SDL land in terms of heritage, LVIA and it is also within the same Rural Fringe Character area. These are all high level studies and our site specific technical work has further confirmed the suitability of the Redrow site.

From the outset it is clear that Whitchurch is a village proud of its identity as a distinct, stable, separate, sustainable community within a Green Belt setting, which the vision seeks to protect. The allocation of the Redrow site would be consistent with this approach as well as the key themes of sustainable place including walking and cycling, given the footway that runs adjacent to the site and the close proximity of Sustrans cycle route 3.

The evidence base document provides a summary of workshops during initial consultation. During workshop 1 (January 2018) 3 options were considered:

- Extending Bristol;
- Extending Whitchurch; and
- A new independent settlement.

The first option was discounted due to landscape and historical setting and the third option was seen as a possibility. The second option, which is relevant to the Redrow site was discounted due to

*“severance created by the orbital link road and lack of available development land to the north and west of the village. However, there may be opportunities for smaller scale development within the boundary of the village” (Page 36).*

Furthermore, during workshop 2 it was stated that *“development west of the A37 impacts the setting of Maes Knoll and is not acceptable” (Page 37).*

These factors relate to a high level scope in trying to identify a large quantum of land to accommodate the SDL. However, it is clear that the Redrow site, when considered as an individual non-strategic opportunity distinct from the wider area west of the A37, has similar heritage and landscape characteristics to the land south east that has been identified as a favourable location for the SDL. The site specific technical work carried out supports its suitability of the Redrow site and it is expected to be contained within the orbital route and furthermore is available and can be delivered relatively early within the plan period. This should be considered as a non-strategic opportunity that compliments the SDL.

Figure 28 in this evidence base document provides a ‘New Settlement Plan’ and identifies the potential development area. This includes a combination of the extension of Whitchurch to the east and a new settlement to the south east of the proposed link road. In our opinion there is no reason why land immediately west of the A37 should not be included as part of this strategy, including the Redrow interest outlined in red below. This is reinforced by the inclusion of the land west of the A37 as part of the ‘indicative potential development area’ for the Whitchurch Concept Diagram in the Strategic Development Location Template which forms part of the JSP evidence base.

The Redrow site will further enhance the robustness and flexibility of the plan and count towards non-strategic growth in support of Whitchurch. Therefore land west of the A37 is a further potential development area that should be taken in to account as part of the Council’s Green Belt review:

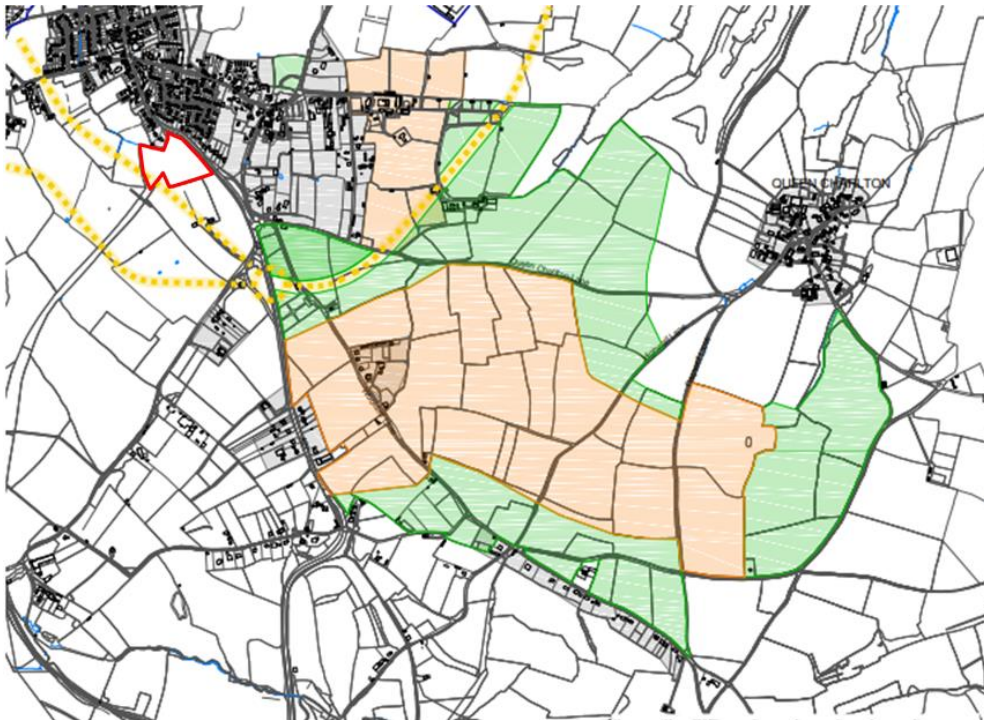


Fig. 28. New settlement plan



Annotated Figure 28 - Whitchurch Emerging Strategic Planning Framework, November 2018

## Policy Options

Below we provide our comments on the emerging Policy Options for the Whitchurch SDL.

### WCH1 Policy Options for the Strategic Planning Framework

*Whilst the Strategic Planning Framework is suggesting a potential way forward for delivering the requirements set out in the JSP, the principle of exploring reasonable alternative options needs to be explored and tested through the Local Plan process. The Council has assessed the options below, on which comments are invited. The Council's preferred approach is largely based on option 3. The principles and more detailed alternatives based on this option are progressed further later in this section.*

- *Option 1: Extending Bristol by infilling the existing Green Belt gap between Whitchurch Village and the Bristol urban area*
- *Option 2: Extending Whitchurch Village to accommodate all the proposed development.*
- *Option 3: The creation of an individual settlement to the south east of Whitchurch Village itself, complemented with an expansion of Whitchurch Village to the east.*

*It is important to note that the requirement is to meet the higher level policy context provided by the JSP, and this includes the level of housing requirement. It may well be that a combination of the above options is required to enable this policy to be satisfied.*

The Redrow site is suitable, available and deliverable and would fall under Option 2. We can therefore support Option 2 on this basis. We understand however, that the preferred option is Option 3.

Whilst the preferred Option 3 does include expansion to Whitchurch, it is solely to the east. As indicated above (Annotated Figure 28) there are no clear obstacles to delivery immediately west of the A37 as well. This would be well contained and would follow the organic pattern of growth in the village. This is supported by the technical work undertaken by Redrow which suggests that the Redrow site is relatively free of physical constraint and should be considered for Green Belt release.

It is identified above that *“it may well be that a combination of the above options is required to enable this policy to be satisfied”*. Given that the overall housing requirement by the JSP is yet to be tested at examination and that the numbers are only likely to increase rather than decrease, we would agree that the Council should consider a combination of Options 2 and 3 to facilitate sustainable growth. This would provide both new settlement and significant extension in accordance with paragraph 72 of the NPPF in relation to planning for the supply of large numbers of new homes.

Furthermore, the options consultation suggests at paragraph 6.9.1 that development (of the SDL) is not anticipated until approximately 2029 at the earliest, as delivery is dependent on infrastructure being delivered first. Policy 7.1 of the submitted version of the JSP states that no dwellings will be completed at Whitchurch SDL ahead of the planned orbital link road and park and ride. The NPPF provides clarity on this matter, it states at paragraph 109 that *“development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”*. Therefore it may be appropriate that some development would come forward ahead of the orbital route, especially that that can be served by existing infrastructure in Whitchurch.

The Redrow site has been subject of a transport appraisal which concludes that there is capacity within the existing road network to serve the amount of development proposed circa 75 dwellings. The Redrow site is independent of the delivery of the SDL, represent a logical and limited extension to Whitchurch village and can be delivered in the earlier stages of the plan period.

If the SDL is unlikely to be delivered until the later stages of the plan i.e. 2029 onwards, the Council will need to consider delivery options for the first 13 years of the plan period. The Redrow site in Whitchurch would present itself as an opportunity for earlier delivery of housing contributing to the overall housing requirement thus ensuring that the Plan is effective.

### **Development Management Policies**

The Local Plan Options document also presents a review of development management policies, this includes a combination of reviewing existing development management policies and specific policies drafted in the context of the JSP, namely in relation to; climate change; housing; employment; fats food takeaways; parking standards and electric vehicle infrastructure; green infrastructure and viability.

Below we provide comments on particular issues that would be likely to impact on the development of the site that we promote on behalf of Redrow Homes. We reserve the right to make further comments on all development management policies as the plan advances.

### **Policy DM1 - Emerging policy approach for carbon reduction**

The emerging policy seeks to achieve zero regulated and unregulated carbon emissions from a combination of energy efficiency on site carbon reductions and allowable solutions reflecting the energy hierarchy.

This approach is considered to be onerous and may impact on deliverability of developments. Relevant standards for energy efficiency should be in accordance with national standards which are set within building regulations. That said other design measures can be encouraged through new development in accordance with NPPF paragraph 50(b) which states that new development should be planned for in ways that can help reduce greenhouse gas emissions by its location, orientation and design. Furthermore it makes clear that any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.

### **Policy DM5 - Approaches for facilitating the delivery of self-build plots**

The emerging policy seeks to facilitate the delivery of self-build plots. We would advise caution that self-build may have practical and delivery implications when mixed within larger 'standard' housing schemes. Self-build schemes would therefore be better managed on self-build only plots. Any policy for self-build plots should be fully justified and supported by evidence of need and genuine demand from people wishing to build their own homes.

### **Policy DM7 - Proposed policy approach for housing accessibility policies**

The emerging policy seeks to consolidate housing accessibility standards so that market and affordable housing developments work towards a unified standard.

Any new accessibility standards should be in accordance with national guidance. Paragraph 127f of the NPPF states that planning policies should ensure developments create places that are safe, inclusive and accessible and footnote 46 adds that *planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would meet identified need for such properties.*

### **Policy DM8 - Proposed policy approach for space standards**

Emerging policy DM8 seeks to introduce the nationally described space standard for all housing in B&NES, with the exception of micro living.

Many new build properties are already built to or are in exceedance of national space standards. Should B&NES wish to introduce the standards formally through local planning policy, this will need to be justified in accordance with national policy and guidance.

The Government's Written Ministerial Statement dated 25<sup>th</sup> March 2015 stated that "*the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the National Planning Policy Framework and Planning Guidance*". Furthermore, the NPPG (ID: 56-020-20150327) sets out that where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local Planning Authorities should take account of the following areas need, viability and timing.



### **Policy DM14 - Policy Options for Residential Parking Standards**

The emerging policy approach seeks to review existing standards, considering whether there should be a variation in standards across the district and whether garages should be included or excluded from the parking standard.

We would support the option for inclusion of garages as parking spaces and would suggest that the setting of local provisions should be consistent with national policy, taking in to account:

- the accessibility of the development;
- the type, mix and use of development;
- the availability of and opportunities for public transport;
- local car ownership levels; and
- an overall need to reduce the use of high-emission vehicles.

### **Policy DM15 - Options for defining Parking Standards**

We consider that DM15 could be merged with DM14 for conciseness. Furthermore, any reference to a Supplementary Planning Document (SPD) in Policy is not compliant with the Regulations by conferring development plan status onto a document which has not been subject of examination and does not have statutory weight.

### **Policy DM16 - Emerging policy approach for electric vehicles infrastructure**

The emerging policy seeks infrastructure for charging vehicles. Whilst the proposal seeks to encourage the use of low emission vehicles, there is a concern that this type of policy could become dated very quickly as technology advances. For instance, many electric vehicles come with adapters that mean they can be charged from regular electricity points in garages for instance, thus reducing the need for a specific charging infrastructure that could add unnecessary cost and design implications to developments.

### **DM17 Review of existing Development Management policies**

We reserve the right to comment on the review of existing Development Management policies once draft wording is in place.

### **Conclusion**

We are grateful for the opportunity to comment on the Local Plan Options and hope that our comments are helpful and informative to the preparation of the emerging Local Plan. Overall we support the vision and objectives for the plan in supporting significant growth in B&NES up to 2036.

B&NES need to incorporate significant housing growth as set by the JSP. This includes 3,000 dwellings through SDL and 700 dwellings with scope for contingency through non-strategic growth. These figures are the very minimum and are, if anything, likely to increase as the JSP is tested in examination. Therefore, to ensure flexibility, it is important for B&NES to be thorough at this stage in considering all options available that can realistically be achieved in the plan period, including consideration of our client's site.

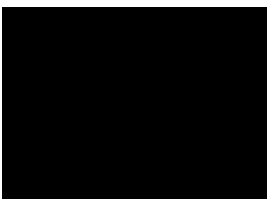
The targets for the plan period are a minimum and accordingly the Council will need to consider sustainable sites within the Green Belt akin to Spatial Strategy Option 3 (SS3). Any option going forward must allow for non-strategic growth within the Green Belt to be sustainable and we therefore support SS3.

Our representations, on behalf of Redrow Homes, promote land west of the A37, Whitchurch, as a suitable site for non-strategic allocation in the emerging Local Plan. A project team has been assembled by Redrow Homes and initial technical appraisals have been undertaken, the conclusions of which support the site as being suitable for allocation for residential development. The site is sustainably located, being well connected to Whitchurch village and its existing services and facilities as well as being served by existing footways and cycle routes. The site is available, suitable for development and can be delivered within the early stages of the plan period.

We do not object to the principle of the Whitchurch SDL. It confirms the suitability of Whitchurch as a sustainable location capable of accommodating significant growth. However, we would stress that growth in the JSP area should not be overly reliant on growth through SDL alone, Whitchurch is also suitable for non-strategic growth and that given that there will be a Green Belt review for Whitchurch to accommodate the SDL, we would advise that the whole area is considered comprehensively. This should include consideration of the Redrow site which is well contained and connected to the village and can be delivered relatively early and would therefore compliment the overall plan objectives. Consideration of such non-strategic opportunities will improve deliverability and overall robustness of the plan.

Thank you for the opportunity to comment. We hope that the promotion of the Redrow site in Whitchurch is helpful in providing additional options for B&NES to consider. We look forward to the opportunity to cooperate with officers as the plan advances.

Yours faithfully,



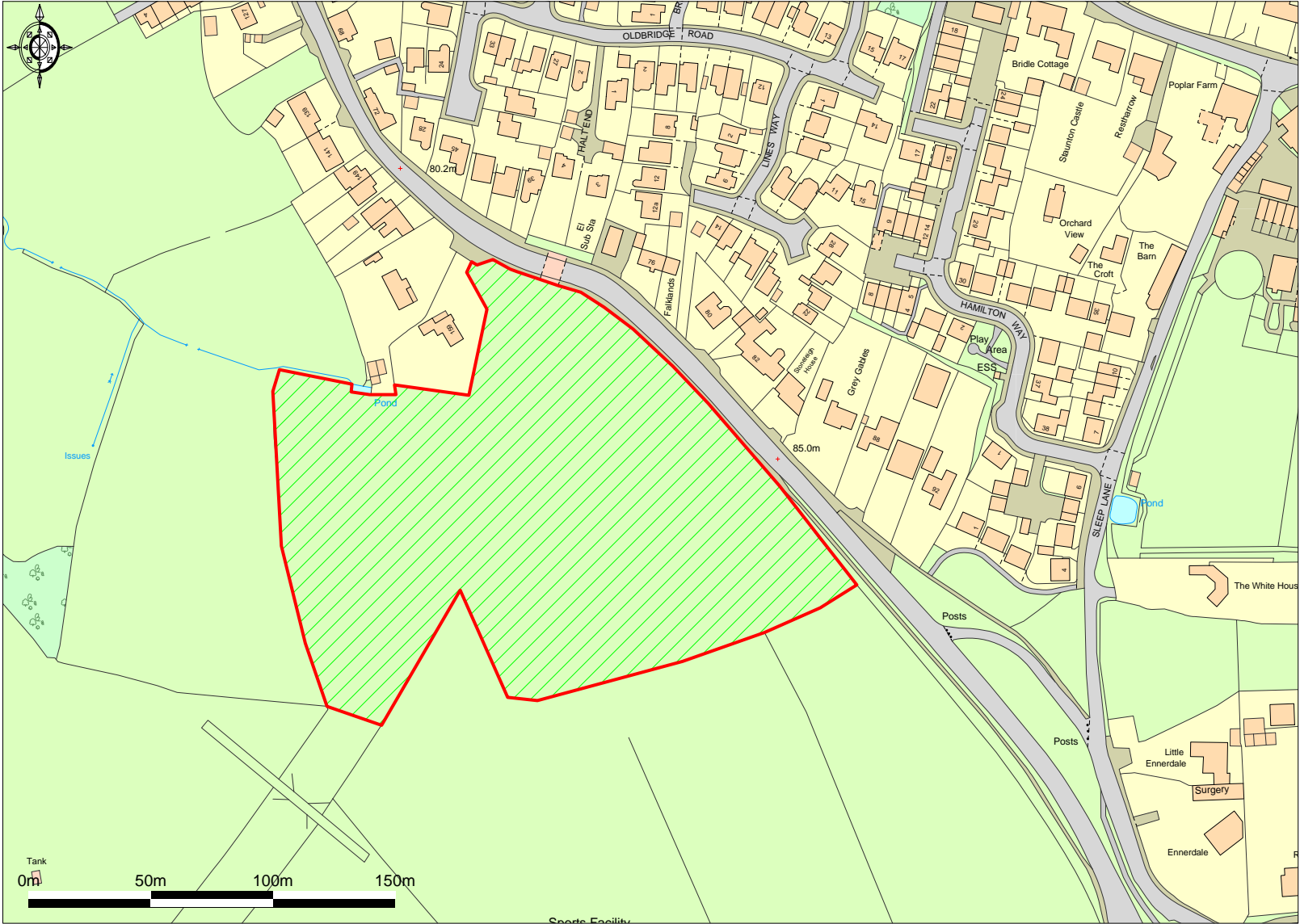
**Alistair Macdonald**  
Director, Head of Boyer Bristol

Tel: 0117 428 7970

Email: [alistairmacdonald@boyerplanning.co.uk](mailto:alistairmacdonald@boyerplanning.co.uk)

Appendix 1

Land on the South and East side of Bristol Road, Whitchurch, Bristol, BS14 0PU  
6.58 acres (2.66 hectares)



Promap  
LANDMARK INFORMATION GROUP

Ordnance Survey © Crown Copyright 2017. All rights reserved. Licence number 100022432. Plotted Scale - 1:2500

John Alison Land & Research Ltd  
Plan to Scale: 1:2500

Appendix 2

# HELAA: Call for Sites 2018

## GUIDANCE ON COMPLETING THIS FORM

Sites can be submitted for the HELAA between 12<sup>th</sup> November 2018 and 7<sup>th</sup> 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 7<sup>th</sup> 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.

<b>1. PREVIOUS SUBMISSIONS</b>
<b>a. Has this site previously been submitted?</b> No
<b>b. Previous reference number (if known):</b> N/A
<b>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?</b>  Click here to enter text.

**\*Please choose/delete where applicable**

<b>2. YOUR DETAILS</b>		
<b>a. Name:</b>	Alistair Macdonald	
<b>b. Company/organisation:</b>	Boyer	
<b>c. Address:</b>	160 Aztec, Aztec Wes, Bristol	
<b>d. Postcode:</b>	BS32 4TU	
<b>e. Telephone:</b>	0117 428 7970	
<b>f. Email:</b>	<a href="mailto:Alistairmacdonald@boyerplanning.co.uk">Alistairmacdonald@boyerplanning.co.uk</a> <a href="mailto:bristol@boyerplanning.co.uk">bristol@boyerplanning.co.uk</a>	
<b>g. Status (please mark all that apply):</b>		
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>  Redrow Homes Ltd Redrow House West Point, Great Park Road, Bradley Stoke, Bristol BS32 4QG
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.		
<b>h. Ownership details (please mark where applicable):</b>		
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"/>
<b>i. If owner/part owner, have you attached a title plan and deeds with this form?</b>	No	
<b>j. If you are not the owner of the entire site, please provide details of the (other) owner(s), if known</b>		
	Our client, Redrow Homes, hold a long term option agreement in relation to the site.	
<b>k. Does the owner (or other owner(s)) support your proposals for the site?</b>	Yes	

\*Please choose/delete where applicable

<b>3. SITE DETAILS</b>	
a. <b>Site Address:</b>	Land west of A37, Whitchurch ST613672
b. <b>Postcode (where applicable):</b>	N/A
c. <b>Current Land Use</b>	Agriculture
d. <b>Adjacent Land Use(s)</b>	Agriculture (west) Sport and Recreation (south) Residential (north and east)
e. <b>Relevant Planning History (including reference numbers, if known)</b>	N/A
f. <b>Please confirm that you have provided a site plan:</b>	Yes

<b>4. POTENTIAL USES &amp; CAPACITY</b>		
Suggested uses (please tick all that apply and where mixed use indicate % of overall site for each use)		
<b>USE</b>	<b>SELECT</b>	<b>Capacity (number of units) and indication of possible residential tenures, types and housing for different groups</b>
Residential dwellings (C3)	Yes	75 approx.
Residential – self-build dwellings only		
Other residential, e.g. student accommodation, residential care homes etc (specify)		
Office, research & development, light industrial (B1)		
General industrial (B2) / warehousing (B8)		
Sports / leisure (please specify)		
Retail		

**\*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	See section 8
Is the site subject to flooding?	No	See section 8
Is the site affected by 'bad neighbour' uses (e.g. power lines, railway lines, major highways, heavy industry)?	No	See section 8
Is there a possibility that the site is contaminated?	No	See section 8
Can satisfactory vehicular access to the site be achieved?	Yes	See section 8
Has the Highways Agency been consulted?	No	See section 8
Is the site subject to any other key constraints?	No	See section 8

### 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"/>
vii. Other (please specify):	viii. Please provide any other relevant information relating to site suitability:  Served by existing services at Whitchurch.

**\*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	See section 8
Must land off-site be acquired to develop the site?	No	See section 8
Are there any current uses which need to be relocated?	No	See section 8
Is the site owned by a developer or is the owner willing to sell?	Yes	See section 8

**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	35	40									

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

Can be delivered in the short – medium term of the emerging plan period. Land is in control by a major national housebuilder and as such can be delivered relatively quickly.

**\*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	See section 8
Does the site require significant new infrastructure investment to be suitable for development? If yes, please specify.	No	See section 8
Are there any issues that may influence the economic viability, delivery rates or timing of the development? If yes, please specify.	No	See section 8
Has a viability assessment / financial appraisal of the scheme been undertaken?	No	See section 8
Have any design work studies been undertaken?	Yes	See section 8

## 8. ADDITIONAL COMMENTS

Our client, Redrow Homes, has an option on the land and has undertaken an initial technical review. Redrow has assembled a project team as follows:

Ecology – Tylker Grange

Landscape and Green Belt Review – Liz Lake Associates

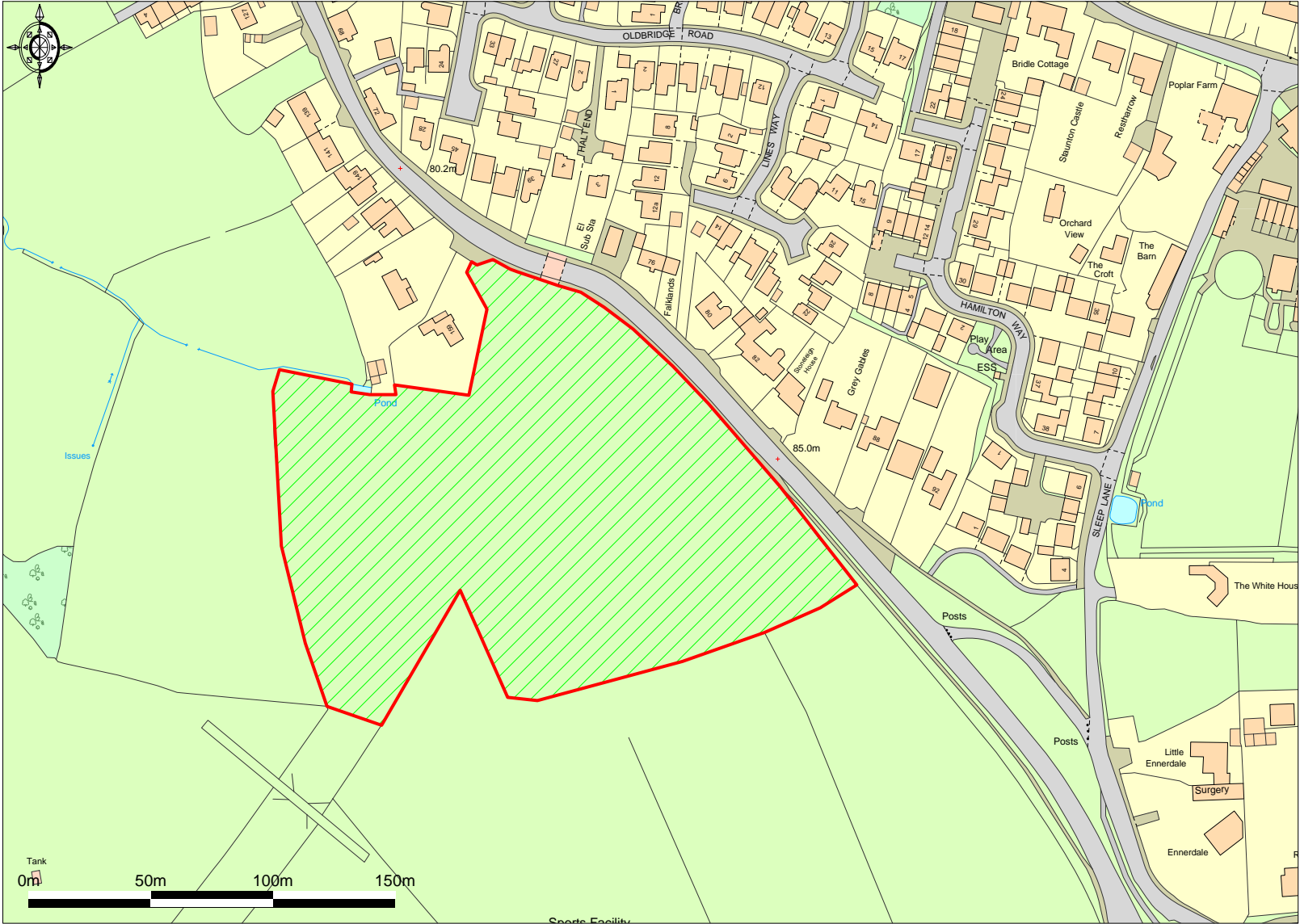
Heritage – Orion Heritage

Transport – Paul Basham Associates

The site is available and initial technical investigations find that the site is suitable for residential development. The site could deliver circa 75 dwellings in the short to medium term and be catered for within the capacity of existing infrastructure.

**\*Please choose/delete where applicable**

Land on the South and East side of Bristol Road, Whitchurch, Bristol, BS14 0PU  
6.58 acres (2.66 hectares)



**Promap**  
LANDMARK INFORMATION GROUP

Ordnance Survey © Crown Copyright 2017. All rights reserved. Licence number 100022432. Plotted Scale - 1:2500

John Alison Land & Research Ltd  
Plan to Scale: 1:2500

# HELAA: Call for Sites 2018

## GUIDANCE ON COMPLETING THIS FORM

Sites can be submitted for the HELAA between 12<sup>th</sup> November 2018 and 7<sup>th</sup> 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 7<sup>th</sup> 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.

<b>1. PREVIOUS SUBMISSIONS</b>
<b>a. Has this site previously been submitted?</b> No
<b>b. Previous reference number (if known):</b> N/A
<b>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?</b>
Click here to enter text.

**\*Please choose/delete where applicable**

<b>2. YOUR DETAILS</b>		
<b>a. Name:</b>	Alistair Macdonald	
<b>b. Company/organisation:</b>	Boyer	
<b>c. Address:</b>	160 Aztec, Aztec Wes, Bristol	
<b>d. Postcode:</b>	BS32 4TU	
<b>e. Telephone:</b>	0117 428 7970	
<b>f. Email:</b>	<a href="mailto:Alistairmacdonald@boyerplanning.co.uk">Alistairmacdonald@boyerplanning.co.uk</a> <a href="mailto:bristol@boyerplanning.co.uk">bristol@boyerplanning.co.uk</a>	
<b>g. Status (please mark all that apply):</b>		
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>  Redrow Homes Ltd Redrow House West Point, Great Park Road, Bradley Stoke, Bristol BS32 4QG
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.		
<b>h. Ownership details (please mark where applicable):</b>		
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"/>
<b>i. If owner/part owner, have you attached a title plan and deeds with this form?</b>	No	
<b>j. If you are not the owner of the entire site, please provide details of the (other) owner(s), if known</b>		
	Our client, Redrow Homes, hold a long term option agreement in relation to the site.	
<b>k. Does the owner (or other owner(s)) support your proposals for the site?</b>	Yes	

\*Please choose/delete where applicable

<b>3. SITE DETAILS</b>	
a. <b>Site Address:</b>	Land west of A37, Whitchurch ST613672
b. <b>Postcode (where applicable):</b>	N/A
c. <b>Current Land Use</b>	Agriculture
d. <b>Adjacent Land Use(s)</b>	Agriculture (west) Sport and Recreation (south) Residential (north and east)
e. <b>Relevant Planning History (including reference numbers, if known)</b>	N/A
f. <b>Please confirm that you have provided a site plan:</b>	Yes

<b>4. POTENTIAL USES &amp; CAPACITY</b>		
Suggested uses (please tick all that apply and where mixed use indicate % of overall site for each use)		
<b>USE</b>	<b>SELECT</b>	<b>Capacity (number of units) and indication of possible residential tenures, types and housing for different groups</b>
Residential dwellings (C3)	Yes	75 approx.
Residential – self-build dwellings only		
Other residential, e.g. student accommodation, residential care homes etc (specify)		
Office, research & development, light industrial (B1)		
General industrial (B2) / warehousing (B8)		
Sports / leisure (please specify)		
Retail		

**\*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	See section 8
Is the site subject to flooding?	No	See section 8
Is the site affected by 'bad neighbour' uses (e.g. power lines, railway lines, major highways, heavy industry)?	No	See section 8
Is there a possibility that the site is contaminated?	No	See section 8
Can satisfactory vehicular access to the site be achieved?	Yes	See section 8
Has the Highways Agency been consulted?	No	See section 8
Is the site subject to any other key constraints?	No	See section 8

### 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"/>
vii. Other (please specify):	viii. Please provide any other relevant information relating to site suitability:  Served by existing services at Whitchurch.

**\*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	See section 8
Must land off-site be acquired to develop the site?	No	See section 8
Are there any current uses which need to be relocated?	No	See section 8
Is the site owned by a developer or is the owner willing to sell?	Yes	See section 8

**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	35	40									

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

Can be delivered in the short – medium term of the emerging plan period. Land is in control by a major national housebuilder and as such can be delivered relatively quickly.

**\*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	See section 8
Does the site require significant new infrastructure investment to be suitable for development? If yes, please specify.	No	See section 8
Are there any issues that may influence the economic viability, delivery rates or timing of the development? If yes, please specify.	No	See section 8
Has a viability assessment / financial appraisal of the scheme been undertaken?	No	See section 8
Have any design work studies been undertaken?	Yes	See section 8

## 8. ADDITIONAL COMMENTS

Our client, Redrow Homes, has an option on the land and has undertaken an initial technical review. Redrow has assembled a project team as follows:

Ecology – Tylker Grange

Landscape and Green Belt Review – Liz Lake Associates

Heritage – Orion Heritage

Transport – Paul Basham Associates

The site is available and initial technical investigations find that the site is suitable for residential development. The site could deliver circa 75 dwellings in the short to medium term and be catered for within the capacity of existing infrastructure.

**\*Please choose/delete where applicable**

**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		Title	Mr
First Name		First Name	Alistair
Surname		Surname	Macdonald
Job Title <i>(only if applicable)</i>		Job Title	Director
Organisation <i>(only if applicable)</i>	Redrow Homes	Organisation	Boyer
Email		Email	alistairmacdonald@boyerplanning.co.uk
Address		Address	Boyer Bristol
			160 Aztec Aztec West
			Bristol
Postcode		Postcode	BS32 4TU
Date		Date	7 January 2019

**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*

X

**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?** Please refer to accompanying letter  
Please use the unique reference number by each policy approach/option.

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

*Please refer to accompanying letter.*

*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**

7 January 2019  
Our Ref: BRS.18.9003

160 Aztec  
Aztec West  
Bristol  
BS32 4UB

Planning Policy  
Bath & North East Somerset Council  
PO Box 5006  
Bath  
BA1 1JG

T 0117 428 7970

Dear Sir / Madam

## Re: Bath & North East Somerset Local Plan 2016-2036 – Options Consultation Winter 2018

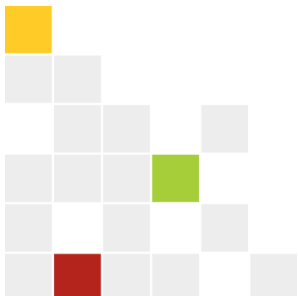
### Executive Summary

On behalf of our client, Redrow Homes Ltd, Boyer is instructed to submit representations in response to the Bath & North East Somerset (B&NES) Local Plan 2016-2036 Options consultation (herein referred to as Local Plan Options). The representations provide commentary on the draft policy options and promote land to the west of the A37, Whitchurch for consideration as an allocation for residential development (Site Location Plan attached at **Appendix 1**).

Our comments are intended to be helpful to B&NES in the production of the emerging plan, key points we seek to highlight are that:

- B&NES will need to plan positively in response to the strategic context and housing requirements set by the West of England Joint Spatial Plan (JSP), this includes allowing flexibility for contingency as JSP housing targets are yet to be tested at examination and are more likely to increase than decrease (as indicated by an Industry Consortium that Redrow form part of).
- We support the principle of a Strategic Development Location (SDL) at Whitchurch, however, Green Belt review should not be limited to catering for Strategic growth and should also be considered for non-strategic growth. Within B&NES much of the Green Belt land is more sustainably located than the non-Green Belt land.
- Accordingly, the Council should carry out a thorough Green Belt review given the opportunity for both strategic and non-strategic development in Whitchurch the context of the SDL and proposed supporting infrastructure.
- We promote land west of the A37, Whitchurch which is approximately 2.7ha in area and is capable of delivering circa 75 dwellings in the earlier stages of the plan period. The site represents a suitable and sustainable development opportunity that would support the objectives and vision of the emerging Local Plan and thus should be considered for allocation and release from the Green Belt.

An analysis of the site is provided below and further details are included in **Appendix 2** (HELAA



form). We provide a summary of the strategic context followed by our comments on the Local Plan Options. We have commented on the parallel Strategic Transport Studies Consultation separately.

### **Site Promotion – Land West of A37 Whitchurch**

On behalf of Redrow Homes Ltd, land is promoted for consideration as an allocation in the emerging Local Plan. The land (identified in **Appendix 1**) is situated immediately west of the A37 (Bristol Road). This land is promoted as a site that is available now, and being capable of achieving a deliverable and sustainable development as well as providing significant benefits for Whitchurch. Its allocation would also be supported by the objectives of the emerging Local Plan and West of England Joint Spatial Plan (JSP) which both identify Whitchurch as a location for significant growth including as a Strategic Development Location (SDL)

### **Site and Surroundings**

The site is currently laid to pasture and comprises approximately 2.7ha of land and is irregular in shape with a slight north facing slope. The site is well contained within existing boundaries defined by trees and hedgerows. The land is bound to the east by the A37 (Bristol Road) and residential development on the opposite side of the road, to the north by residential development, to the south by a field and sports pitches, including Bristol Barbarians Rugby Club and to the west by fields.

The site is located within the boundary of Bath and North East Somerset Council (B&NES), and lies within the parish of Whitchurch. The site lies outside the Housing Development Boundary of Whitchurch and within the Green Belt,

The Environment Agency's Flood Map for Planning shows that the appraisal site, and the wider locality of Whitchurch, is situated within Flood Zone 1. This means that there is a low probability of flooding at this location, with less than 1 in 1,000 annual probability of river or sea flooding.

There are no listed buildings located at the appraisal site, and Whitchurch does not contain a Conservation Area. However, within a 0.5km radius of the site, there are a number of listed buildings including the Grade II\* Church of St Nicholas being located approximately 0.27km to the north.

Additionally, the Scheduled Ancient Monument of Maes Knoll is situated approximately 1.6 km south west of the appraisal site and Queen Charlton Conservation Area is located approximately 1.85 km east of the appraisal site.

The site is not subject to any Tree Preservation Orders.

The village of Whitchurch has a range of local amenities and is connected to the site via pedestrian footway. The northern boundary of the site is situated approximately 0.45 km south of Whitchurch Primary School, approximately 1 km south of Woodlands Academy school and nursery, and Bridge Farm Primary School is situated approximately 1km north west of the site. A large supermarket and Whitchurch Health Centre are located approximately 1.5 km north west of the site. Furthermore, Whitchurch is well connected to the city of Bristol, being on the south eastern periphery.

In terms of public transport connectivity Sleep Lane bus stop is located approximately 0.1 km south east of the site, with frequent routes to central Bristol and the village of Street.

## Technical Assessments

Our client, Redrow Homes Ltd, has assembled a project team and initial technical assessments have been carried out which confirm the suitability and deliverability of the site. The technical work has assessed:

- Ecology;
- Green Belt;
- Heritage;
- Landscape; and
- Transport and Access

This work has included a review of the Plans' evidence base and concludes that there are no overriding constraints to the development of the site. It is estimated that the site can deliver approximately 75 dwellings in the short to medium term.

Included within **Appendix 2** is a completed HELAA form.

## Summary

The site is available and initial technical investigations find that the site is suitable for residential development. The site is highly sustainable, being well connected to Whitchurch and can be delivered independently without dependence on significant infrastructure. The site could deliver circa 75 dwellings in the short to medium term and be catered for within the capacity of existing infrastructure. We would therefore encourage that the site is considered for non-strategic development allocation and release from Green Belt as it will contribute towards the objectives for sustainable growth in Whitchurch and can be achieved in the earlier phases of the plan period. The allocation of the site is therefore considered to contribute towards the robustness of the emerging plan.

## Strategic Context

The strategic context for significant growth in response to development pressures in the Bristol city region and the need for Local Plan review is set by the West of England JSP. The JSP is a strategic statutory Development Plan Document (DPD) for the West of England, being prepared jointly by Unitary Authorities of Bristol, Bath and North East Somerset, North Somerset and South Gloucestershire.

On adoption JSP, will form part of the development plan and carry full weight in the planning system and provide the higher level strategic planning policy framework for each authority's new Local Plan for the period 2016 to 2036, including the B&NES Local Plan subject to this consultation.

Whilst the JSP will not allocate new sites, it does identify new Strategic Development Locations (SDLs), including Whitchurch which will need to be brought forward as allocations through the Local Plan. New site specific allocations and policy designations in Local Plans will need to be in conformity with the JSP.

The JSP provides a target for 105,500 new homes in the Plan Period. It is Redrow's position that an objective and proper assessment of need would suggest a requirement of at least 140,000 (as outlined in more detail below).

As the JSP is yet to be examined, these figures are not fixed and are anticipated if anything to be increased rather than decreased and as such the Unitary Authorities need to consider further allocation options for flexibility.

In respect of the supply of large numbers of new homes, paragraph 72 of the NPPF (2018) states that:

*“The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:*

*a) consider the opportunities presented by existing or planned investment in infrastructure, the area’s economic potential and the scope for net environmental gains;*

*b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;*

*c) set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided;*

*d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations); and*

*e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size”.*

In accordance with the NPPF and the strategic context set by the JSP, B&NES has the opportunity to fully review distribution of growth and with specific regard to Whitchurch, there is the opportunity to appropriately deliver the significant numbers of homes required through both new settlement and significant extension.

### **Housing Numbers and Green Belt Release**

It is acknowledged within the JSP (paragraph 19 under the sub heading ‘Strategic Development Locations’) that it is not possible to accommodate sustainably all the identified growth needs entirely outside the Green Belt, and this is based on the JSPs preferred conclusion regarding OAHN.

In order to facilitate higher levels of growth to accommodate what we consider to better reflect the full OAHN, i.e. 140,000 homes, additional strategic and non-strategic growth will be required in sustainable locations, including sites located within the Green Belt.



Policy 1 of the JSP confirms that the JSP makes provision for the supply of at least 105,000 new homes over the Plan period 2016-2036, which is above the identified requirement of 102,000 homes over this period and is intended to “allow some flexibility”.

As part of the industry consortium, of which our client, Redrow Homes forms part of, we endorse the conclusions of the assessment undertaken by Barton Willmore which concludes that the full **OAHN for the West of England is a minimum of c.140,000 additional dwellings over the period 2016-2036.**

The JSP (paragraph 19 under ‘Strategic Development Locations’) acknowledges that it is not possible to accommodate sustainably all the identified growth needs entirely outside the Green Belt as the transport impacts would be so severe that they could not be fully mitigated even with substantial investment.

Given that Bristol is the prime generator of housing need within the JSP area, and the fact that the Spatial Strategy is purportedly premised on the achievement of sustainable development, the approach to selecting Whitchurch as an SDL and thus the principle of significant growth in Whitchurch is supported. This growth should not be solely dependent on strategic schemes and should also include suitable non-strategic sites.

In order to provide a positive and deliverable response to the housing requirements including any likely necessary uplift in planned housing delivery, it is acknowledged that the scale of growth proposed in the JSP cannot be entirely located outside the Green Belt. This growth should not necessarily be limited to strategic development, as a comprehensive assessment of the Green Belt is likely to identify additional sites in sustainable locations, such as Whitchurch, are also suitable for non-strategic development.

Therefore at this Options stage of the Local Plan it would be beneficial for a full review of the Green Belt to take place for both strategic and non-strategic development. Given that the housing figures are a minimum and that there is a likely possibility of them increasing, the Council should consider all suitable and available sites that can be delivered within the plan period, including Green Belt sites to allow flexibility. This includes the site being promoted on behalf of Redrow Homes which is well contained and well connected with Whitchurch and can be delivered within the early-medium term without the need for significant infrastructure. The Redrow site can therefore offer non-strategic growth complementary to that planned through the wider SDL and can be delivered ahead of the wider SDL offering earlier housing completions to be achieved.

This approach would accord with the principles of paragraph 35 of NPPF on soundness including the requirement for plans to be *positively prepared* through meeting the areas objectively assessed need including co-operation, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; and *effective*, being deliverable over the plan period.

The Landscape and Green Belt assessment commissioned by Redrow has demonstrated that the site has a very limited role in respect of the purpose and functions of the Green Belt. This position is to be further improved with the completion of the planned orbital link road which will provide a further defensible boundary. The Council should therefore consider the suitability of allocating this site, which will provide non-strategic growth in Whitchurch.

## **Comments on Local Plans Options Consultation:**

### **Vision and Spatial Priorities**

The vision and spatial priorities outlined in the options document are as follows:

#### **B&NES Vision**

*“Bath and North East Somerset will be internationally renowned as a beautifully inventive and entrepreneurial 21st century place with a strong social purpose and a spirit of wellbeing, where everyone is invited to think big – a ‘connected’ area ready to create an extraordinary legacy for future generations”.*

#### **Spatial Priority for the Local Plan**

- *Cross cutting objective: Pursue a low carbon and sustainable future in a changing climate*
- *Protect and enhance the District's natural, built and cultural environment and provide green infrastructure*
- *Facilitate a strong, productive, diverse and inclusive*
- *Meet housing needs arising from a changing and growing population*
- *Plan for development that promotes health and well being*
- *Deliver well connected places accessible by sustainable means of transport*
- *Ensure the timely and efficient provision of infrastructure to support growing communities*

We support the above vision and spatial priorities and the principle of growth in Whitchurch through the SDL and additional non-strategic growth to ‘*meet housing needs arising from a changing and growing population*’.

### **Spatial Strategy including Rural Areas**

The Local Plan 2016-2036 seeks to deliver at least 14,500 new homes in B&NES over the plan period, including at least 3,000 homes through Strategic Development Locations and at least 700 new homes through non-strategic growth. In order to achieve the delivery of new homes required a series of spatial strategy options are presented in the document. All options seek to direct non-strategic growth towards settlements that have the infrastructure to support development, of key importance is for there to be a primary school with capacity or scope for expansion. These options are outlined as follows and we provide our comments under each option followed by a summary:

#### **Spatial Strategy Options**

**SS1 Option 1.** *Focused approach avoiding the Green Belt Under this option all non-strategic growth is focused at a few key locations outside the Green Belt in the south of the District.*

The Council considers the benefit of this approach is that it could help to facilitate investment in infrastructure such as schools, health facilities, and open space. However the impact of these levels of growth on a settlement could be relatively significant with some settlements having lower level of services and facilities.

SS1 is not considered to be a sustainable strategy as the non-Green Belt locations are predominantly smaller settlements with limited services and facilities and further in distance from key employment areas of Bath and Bristol. Whilst we acknowledge that SS1 focuses on key settlements outside of the Green Belt, they are still further in distance from key employment areas than Green Belt locations and encourage further distances of travel. This is reinforced within the existing adopted Development Plan, where B&NES recognise the challenges faced for growth in the Somer Valley related to the balance between housing and economic opportunity, with a perceived difficulty in attracting economic investment in the area and high levels of out commuting due to the lack of local employment opportunities. This in addition to lesser public transport makes housing growth in the Somer Valley unsustainable leading to dependence on the private car and congestion.

**SS2 Option 2.** *More dispersed approach avoiding the Green Belt The alternate approach would be to distribute the growth across a wider (but still limited) range of settlements. This would result in fewer dwellings at each location.*

This approach would spread development across settlements included in Option 1 in addition to smaller settlements. Under this option, a greater number of dwellings would also be allowed in other non-Green Belt villages during the plan period.

Whilst SS2 may provide a more balanced approach with some modest growth to existing settlements to help support those communities the same issue persists as with SS1 in terms of distance from key employment and commercial centres. As such the strategy encourages further travel, predominantly by private car, and is considered to be unsustainable.

**SS3 Combination of locations outside and within the Green Belt** *If the quantum of development at the locations outlined above is undeliverable or found to be unsustainable, and if exceptional circumstances are demonstrated, the Draft Local Plan could identify land to be removed from the Green Belt and allocate sites for development. This approach would only be considered once all other non-Green Belt options had been fully explored and would focus on the most sustainable locations including suitable opportunities around Bath and other more sustainable Green Belt settlements but crucially, will also be dependent on primary school capacity.. Under such an option the Council would need to be able to demonstrate that directing development to these locations would clearly outweigh potential harm to the Green Belt. Given that sustainable and suitable non-Green Belt options would need to be fully utilised first the scale of any development that would be directed to Green Belt locations is not known at this stage.*

We would agree that SS3 provides the most suitable approach to delivery of non-strategic growth. The Plan requirements are for at least 700 dwellings plus scope for contingency. The Options document suggests growth should be sustainable and considers settlements where there is a primary school with capacity or with scope for expansion.

SS3 would be in accordance with the objectives of the JSP, where it is identified that it is not possible to sustainably accommodate all the identified growth needs entirely outside the Green Belt. To avoid the Green Belt as part of the growth strategy would be dependent on some highly unsustainable locations and the result in transport impacts that cannot be fully mitigated.

It is recognised in the Local Plan Options, through the designation of a SDL, that Whitchurch is an appropriate location for significant development given that it is sustainably located and within close proximity of the services and facilities of both Bristol and Bath. There is a primary school at Whitchurch with limited capacity and the proposed SDL will offer a new primary and secondary schools. Therefore there is scope for expansion in infrastructure at Whitchurch that can support both strategic and non-strategic growth.

Exceptional circumstances have therefore been recognised through the JSP in releasing Green Belt land to cater for significant growth at Whitchurch. We believe that, during the process of Green Belt review, the Council must consider in detail the opportunities for both strategic and non-strategic growth in suitable locations in Whitchurch. For instance the proposed orbital route will act as a new defensible boundary and can contain non-strategic growth in Whitchurch. Whitchurch is a highly sustainable settlement and is recognised as such in its identification as an SDL. Therefore Green Belt review in Whitchurch can help both strategic and shorter term non-strategic delivery in the more sustainable locations.

### **Existing allocations**

**SS4** refers to exiting allocations, this includes land at Whitchurch which was released from Green Belt through the Core Strategy (2004) (Policy RA5). The intentions for RA5 going forward are as follows:

*Whitchurch RA5. Land at Whitchurch Strategic Site Allocation Schemes on parts of the allocated site are under construction. Retain allocation until all schemes are complete.*

This proposal is supported in principle. The development under RA5 is near completion and provides a positive contribution to Whitchurch. This demonstrates how suitable sites have been released from the Green Belt previously and delivered in a sustainable location. An opportunity exists during Local Plan review to consider further suitable non-strategic growth and release of Green belt land in Whitchurch. The Redrow site offers an opportunity being well contained and well connected to the village.

### **Summary – Spatial Strategy**

In addition to identified strategic growth through SDLs there is a plan requirement to provide non-strategic growth of at least 700 dwellings with scope for contingency. The non-strategic growth must take place at sustainable locations and it would be unsustainable for the entirety of this non-strategic growth to take place outside of Green Belt land.

We therefore support option SS3 and would stress that Whitchurch offers the opportunity to cater for some of this non-strategic growth in addition to the SDL identified. Whitchurch is highly sustainable and includes key services and facilities including a primary school and new schools planned through the SDL. Whitchurch will require Green Belt review as the identification of site boundaries for the SDL requires a Green Belt review to be carried out in this location. This review should be comprehensive and include the identification of non-strategic development opportunities. The Redrow site presents one of these options. The site is well contained and has existing well established boundaries. The planned orbital route will only create a further defensible boundary.

## Whitchurch SDL

Whitchurch is identified as one of 12 SDLs through the JSP, which are identified for being consistent with the sustainable development objectives of the Plan. We do not object to the principle of Whitchurch as an SDL, as it presents a sustainable location that is well connected to Bristol and also Bath. However, future growth should not be overly dependent on strategic growth and should be balanced with non-strategic growth opportunities to improve the flexibility and robustness of the plan. The SDL and additional planned orbital route presents a unique opportunity for a thorough Green Belt review in Whitchurch to cater for sustainable growth required by the Local Plan and wider JSP.

### **Background and Evidence Base**

It is helpful to understand the background work and consultation that has resulted in the emergence of the SDL as presented in the Options consultation. This includes the evidence base of the JSP and also Local Plan Options subject to this consultation.

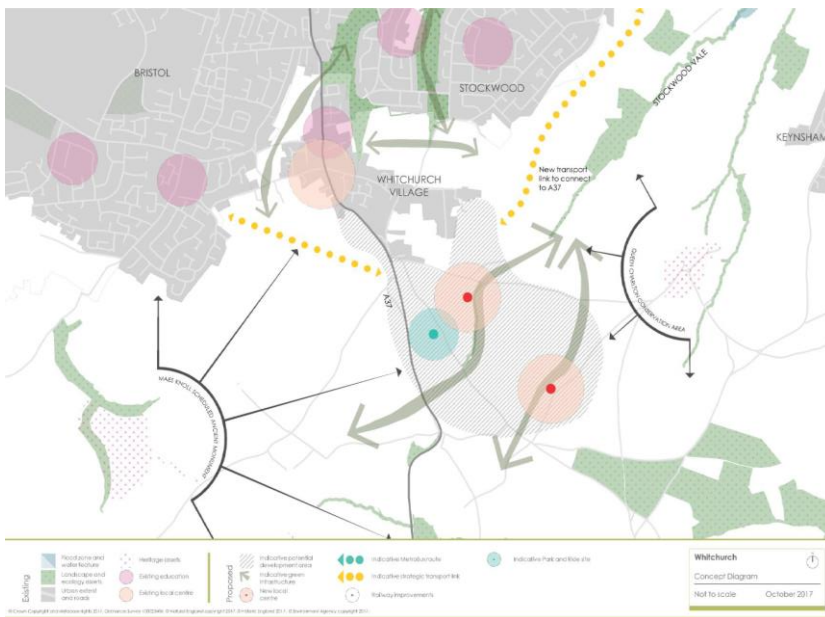
#### *Strategic Development Location Templates (November 2017)*

As part of the evidence base for the Submission version of the JSP, a series of Strategic Development Location Templates (November 2017) were issued in order to guide and further refine the assessment of the potential for development at the SDLs. In doing so, consideration was given to factors such as:

- **Location characteristics:** *Site location, approximate size, relevant planning history and designations, current land use.*
- **Suitability (constraints and opportunities):** *Strategic opportunity, site characteristics, physical & environmental constraints, existing development schemes, opportunities.*
- **Landuses, capacity, availability & viability:** *Mix of uses, employment, housing typology / density, housing capacity, availability, viability.*
- **Draft policy expectations for the location:** *Vision, housing capacity (types, typology & affordable housing) and other land-uses, access, Green infrastructure, infrastructure requirements.*
- **Barriers to delivery / critical interventions:** *Identified risks to suitability availability & achievability,*

The assessment, having considered these factors, also set out a “Concept Diagram”. The concept diagram for Whitchurch identified an “Indicative potential development area”, which whilst predominantly east of the A37 also included land immediately adjoining the western side of the A37 including the Redrow land.

The Concept Diagram for Whitchurch, taken from the JSP evidence base, is reproduced below for ease of reference:



*Extract from Appendix 1 Concept Diagram – Strategic Development Location Templates, November 2017*

Therefore at JSP strategic level, the Redrow site has been identified as being part of an indicative potential development area, this is backed by the technical work carried out by Redrow that confirms that the site is suitable and deliverable.

#### *Whitchurch Emerging Strategic Planning Framework (November 2018)*

The supporting evidence base entitled 'Whitchurch Emerging Strategic Planning Framework, Stage 1 Report (issue 08) (November 2018)' provides an overview of the high level technical work that has been completed.

The strategy appears to avoid land west of the A37 due to landscape concerns, specifically the setting of Maes Knoll. The Redrow site is well contained and scores similarly to the identified SDL land in terms of heritage, LVIA and it is also within the same Rural Fringe Character area. These are all high level studies and our site specific technical work has further confirmed the suitability of the Redrow site.

From the outset it is clear that Whitchurch is a village proud of its identity as a distinct, stable, separate, sustainable community within a Green Belt setting, which the vision seeks to protect. The allocation of the Redrow site would be consistent with this approach as well as the key themes of sustainable place including walking and cycling, given the footway that runs adjacent to the site and the close proximity of Sustrans cycle route 3.

The evidence base document provides a summary of workshops during initial consultation. During workshop 1 (January 2018) 3 options were considered:

- Extending Bristol;
- Extending Whitchurch; and
- A new independent settlement.

The first option was discounted due to landscape and historical setting and the third option was seen as a possibility. The second option, which is relevant to the Redrow site was discounted due to

*“severance created by the orbital link road and lack of available development land to the north and west of the village. However, there may be opportunities for smaller scale development within the boundary of the village” (Page 36).*

Furthermore, during workshop 2 it was stated that *“development west of the A37 impacts the setting of Maes Knoll and is not acceptable” (Page 37).*

These factors relate to a high level scope in trying to identify a large quantum of land to accommodate the SDL. However, it is clear that the Redrow site, when considered as an individual non-strategic opportunity distinct from the wider area west of the A37, has similar heritage and landscape characteristics to the land south east that has been identified as a favourable location for the SDL. The site specific technical work carried out supports its suitability of the Redrow site and it is expected to be contained within the orbital route and furthermore is available and can be delivered relatively early within the plan period. This should be considered as a non-strategic opportunity that compliments the SDL.

Figure 28 in this evidence base document provides a ‘New Settlement Plan’ and identifies the potential development area. This includes a combination of the extension of Whitchurch to the east and a new settlement to the south east of the proposed link road. In our opinion there is no reason why land immediately west of the A37 should not be included as part of this strategy, including the Redrow interest outlined in red below. This is reinforced by the inclusion of the land west of the A37 as part of the ‘indicative potential development area’ for the Whitchurch Concept Diagram in the Strategic Development Location Template which forms part of the JSP evidence base.

The Redrow site will further enhance the robustness and flexibility of the plan and count towards non-strategic growth in support of Whitchurch. Therefore land west of the A37 is a further potential development area that should be taken in to account as part of the Council’s Green Belt review:

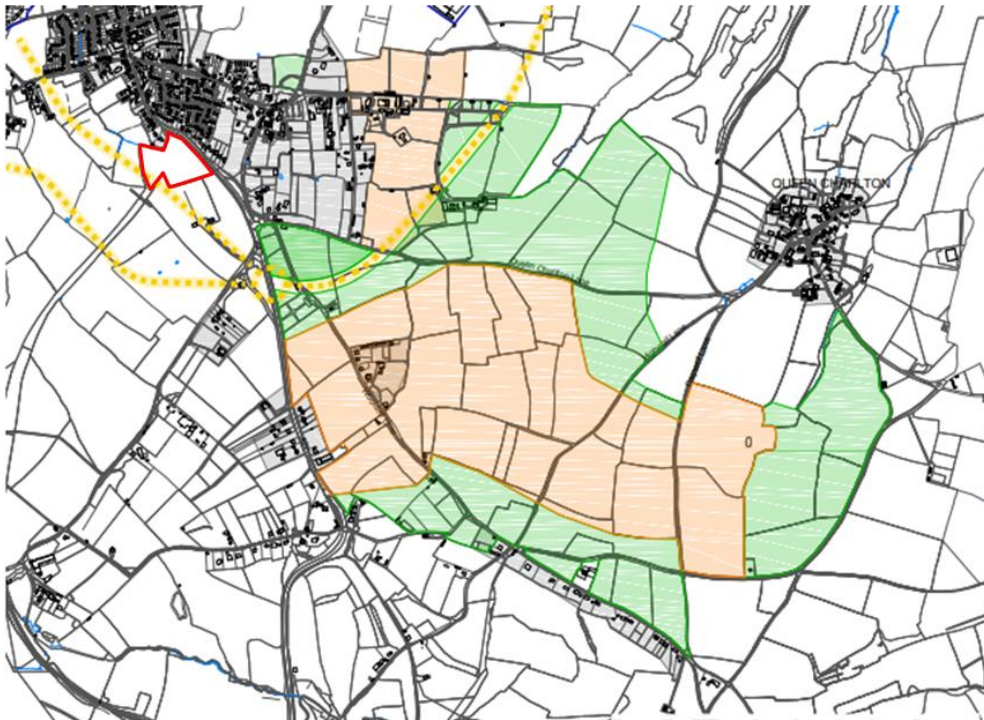


Fig. 28. New settlement plan



Annotated Figure 28 - Whitchurch Emerging Strategic Planning Framework, November 2018

## Policy Options

Below we provide our comments on the emerging Policy Options for the Whitchurch SDL.

### WCH1 Policy Options for the Strategic Planning Framework

*Whilst the Strategic Planning Framework is suggesting a potential way forward for delivering the requirements set out in the JSP, the principle of exploring reasonable alternative options needs to be explored and tested through the Local Plan process. The Council has assessed the options below, on which comments are invited. The Council's preferred approach is largely based on option 3. The principles and more detailed alternatives based on this option are progressed further later in this section.*

- *Option 1: Extending Bristol by infilling the existing Green Belt gap between Whitchurch Village and the Bristol urban area*
- *Option 2: Extending Whitchurch Village to accommodate all the proposed development.*
- *Option 3: The creation of an individual settlement to the south east of Whitchurch Village itself, complemented with an expansion of Whitchurch Village to the east.*

*It is important to note that the requirement is to meet the higher level policy context provided by the JSP, and this includes the level of housing requirement. It may well be that a combination of the above options is required to enable this policy to be satisfied.*



The Redrow site is suitable, available and deliverable and would fall under Option 2. We can therefore support Option 2 on this basis. We understand however, that the preferred option is Option 3.

Whilst the preferred Option 3 does include expansion to Whitchurch, it is solely to the east. As indicated above (Annotated Figure 28) there are no clear obstacles to delivery immediately west of the A37 as well. This would be well contained and would follow the organic pattern of growth in the village. This is supported by the technical work undertaken by Redrow which suggests that the Redrow site is relatively free of physical constraint and should be considered for Green Belt release.

It is identified above that *“it may well be that a combination of the above options is required to enable this policy to be satisfied”*. Given that the overall housing requirement by the JSP is yet to be tested at examination and that the numbers are only likely to increase rather than decrease, we would agree that the Council should consider a combination of Options 2 and 3 to facilitate sustainable growth. This would provide both new settlement and significant extension in accordance with paragraph 72 of the NPPF in relation to planning for the supply of large numbers of new homes.

Furthermore, the options consultation suggests at paragraph 6.9.1 that development (of the SDL) is not anticipated until approximately 2029 at the earliest, as delivery is dependent on infrastructure being delivered first. Policy 7.1 of the submitted version of the JSP states that no dwellings will be completed at Whitchurch SDL ahead of the planned orbital link road and park and ride. The NPPF provides clarity on this matter, it states at paragraph 109 that *“development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”*. Therefore it may be appropriate that some development would come forward ahead of the orbital route, especially that that can be served by existing infrastructure in Whitchurch.

The Redrow site has been subject of a transport appraisal which concludes that there is capacity within the existing road network to serve the amount of development proposed circa 75 dwellings. The Redrow site is independent of the delivery of the SDL, represent a logical and limited extension to Whitchurch village and can be delivered in the earlier stages of the plan period.

If the SDL is unlikely to be delivered until the later stages of the plan i.e. 2029 onwards, the Council will need to consider delivery options for the first 13 years of the plan period. The Redrow site in Whitchurch would present itself as an opportunity for earlier delivery of housing contributing to the overall housing requirement thus ensuring that the Plan is effective.

### **Development Management Policies**

The Local Plan Options document also presents a review of development management policies, this includes a combination of reviewing existing development management policies and specific policies drafted in the context of the JSP, namely in relation to; climate change; housing; employment; fats food takeaways; parking standards and electric vehicle infrastructure; green infrastructure and viability.

Below we provide comments on particular issues that would be likely to impact on the development of the site that we promote on behalf of Redrow Homes. We reserve the right to make further comments on all development management policies as the plan advances.

### **Policy DM1 - Emerging policy approach for carbon reduction**

The emerging policy seeks to achieve zero regulated and unregulated carbon emissions from a combination of energy efficiency on site carbon reductions and allowable solutions reflecting the energy hierarchy.

This approach is considered to be onerous and may impact on deliverability of developments. Relevant standards for energy efficiency should be in accordance with national standards which are set within building regulations. That said other design measures can be encouraged through new development in accordance with NPPF paragraph 50(b) which states that new development should be planned for in ways that can help reduce greenhouse gas emissions by its location, orientation and design. Furthermore it makes clear that any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.

### **Policy DM5 - Approaches for facilitating the delivery of self-build plots**

The emerging policy seeks to facilitate the delivery of self-build plots. We would advise caution that self-build may have practical and delivery implications when mixed within larger 'standard' housing schemes. Self-build schemes would therefore be better managed on self-build only plots. Any policy for self-build plots should be fully justified and supported by evidence of need and genuine demand from people wishing to build their own homes.

### **Policy DM7 - Proposed policy approach for housing accessibility policies**

The emerging policy seeks to consolidate housing accessibility standards so that market and affordable housing developments work towards a unified standard.

Any new accessibility standards should be in accordance with national guidance. Paragraph 127f of the NPPF states that planning policies should ensure developments create places that are safe, inclusive and accessible and footnote 46 adds that *planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would meet identified need for such properties.*

### **Policy DM8 - Proposed policy approach for space standards**

Emerging policy DM8 seeks to introduce the nationally described space standard for all housing in B&NES, with the exception of micro living.

Many new build properties are already built to or are in exceedance of national space standards. Should B&NES wish to introduce the standards formally through local planning policy, this will need to be justified in accordance with national policy and guidance.

The Government's Written Ministerial Statement dated 25<sup>th</sup> March 2015 stated that "*the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the National Planning Policy Framework and Planning Guidance*". Furthermore, the NPPG (ID: 56-020-20150327) sets out that where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local Planning Authorities should take account of the following areas need, viability and timing.

### **Policy DM14 - Policy Options for Residential Parking Standards**

The emerging policy approach seeks to review existing standards, considering whether there should be a variation in standards across the district and whether garages should be included or excluded from the parking standard.

We would support the option for inclusion of garages as parking spaces and would suggest that the setting of local provisions should be consistent with national policy, taking in to account:

- the accessibility of the development;
- the type, mix and use of development;
- the availability of and opportunities for public transport;
- local car ownership levels; and
- an overall need to reduce the use of high-emission vehicles.

### **Policy DM15 - Options for defining Parking Standards**

We consider that DM15 could be merged with DM14 for conciseness. Furthermore, any reference to a Supplementary Planning Document (SPD) in Policy is not compliant with the Regulations by conferring development plan status onto a document which has not been subject of examination and does not have statutory weight.

### **Policy DM16 - Emerging policy approach for electric vehicles infrastructure**

The emerging policy seeks infrastructure for charging vehicles. Whilst the proposal seeks to encourage the use of low emission vehicles, there is a concern that this type of policy could become dated very quickly as technology advances. For instance, many electric vehicles come with adapters that mean they can be charged from regular electricity points in garages for instance, thus reducing the need for a specific charging infrastructure that could add unnecessary cost and design implications to developments.

### **DM17 Review of existing Development Management policies**

We reserve the right to comment on the review of existing Development Management policies once draft wording is in place.

### **Conclusion**

We are grateful for the opportunity to comment on the Local Plan Options and hope that our comments are helpful and informative to the preparation of the emerging Local Plan. Overall we support the vision and objectives for the plan in supporting significant growth in B&NES up to 2036.

B&NES need to incorporate significant housing growth as set by the JSP. This includes 3,000 dwellings through SDL and 700 dwellings with scope for contingency through non-strategic growth. These figures are the very minimum and are, if anything, likely to increase as the JSP is tested in examination. Therefore, to ensure flexibility, it is important for B&NES to be thorough at this stage in considering all options available that can realistically be achieved in the plan period, including consideration of our client's site.

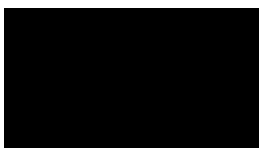
The targets for the plan period are a minimum and accordingly the Council will need to consider sustainable sites within the Green Belt akin to Spatial Strategy Option 3 (SS3). Any option going forward must allow for non-strategic growth within the Green Belt to be sustainable and we therefore support SS3.

Our representations, on behalf of Redrow Homes, promote land west of the A37, Whitchurch, as a suitable site for non-strategic allocation in the emerging Local Plan. A project team has been assembled by Redrow Homes and initial technical appraisals have been undertaken, the conclusions of which support the site as being suitable for allocation for residential development. The site is sustainably located, being well connected to Whitchurch village and its existing services and facilities as well as being served by existing footways and cycle routes. The site is available, suitable for development and can be delivered within the early stages of the plan period.

We do not object to the principle of the Whitchurch SDL. It confirms the suitability of Whitchurch as a sustainable location capable of accommodating significant growth. However, we would stress that growth in the JSP area should not be overly reliant on growth through SDL alone, Whitchurch is also suitable for non-strategic growth and that given that there will be a Green Belt review for Whitchurch to accommodate the SDL, we would advise that the whole area is considered comprehensively. This should include consideration of the Redrow site which is well contained and connected to the village and can be delivered relatively early and would therefore compliment the overall plan objectives. Consideration of such non-strategic opportunities will improve deliverability and overall robustness of the plan.

Thank you for the opportunity to comment. We hope that the promotion of the Redrow site in Whitchurch is helpful in providing additional options for B&NES to consider. We look forward to the opportunity to cooperate with officers as the plan advances.

Yours faithfully,



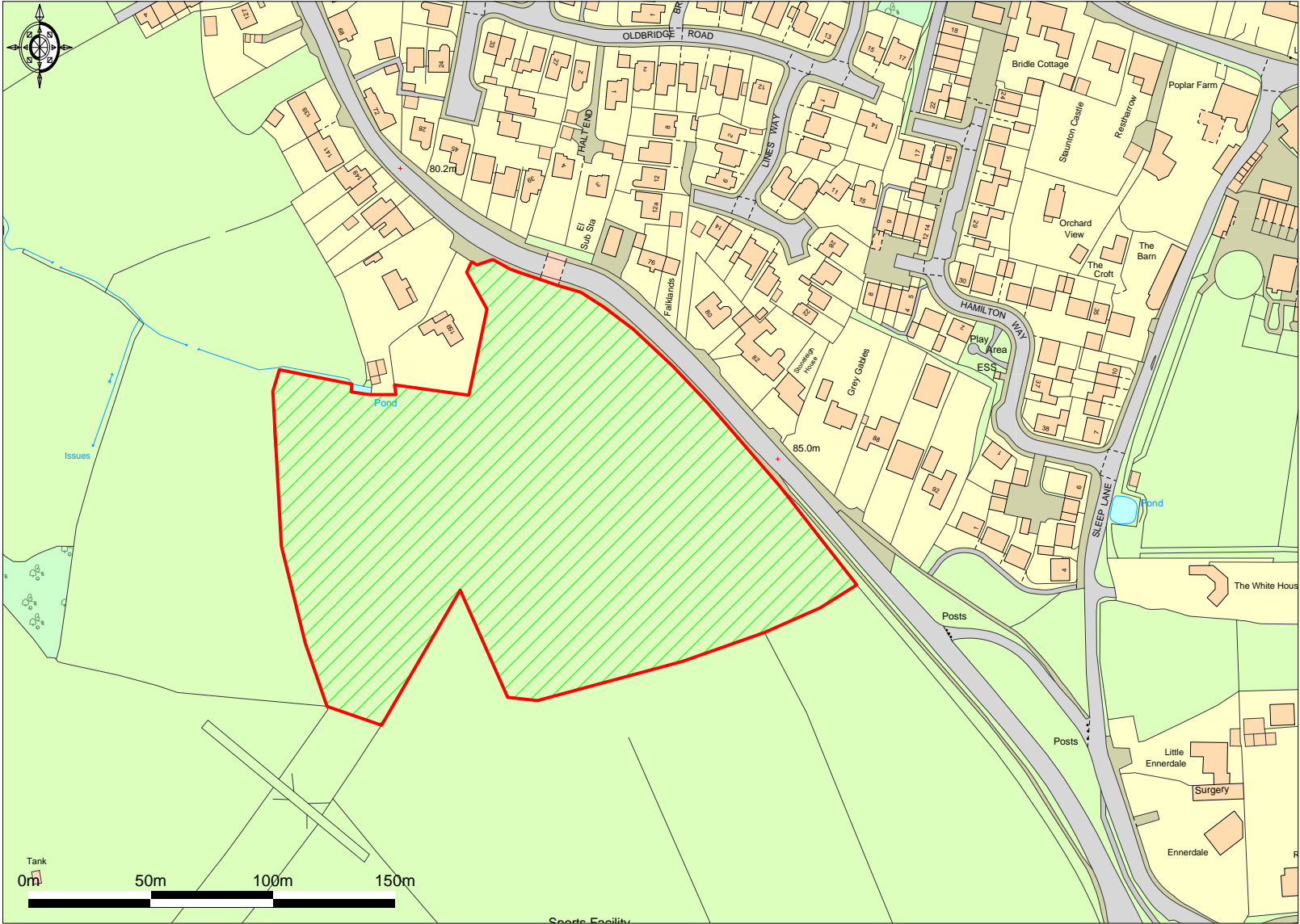
**Alistair Macdonald**  
Director, Head of Boyer Bristol

Tel: 0117 428 7970

Email: [alistairmacdonald@boyerplanning.co.uk](mailto:alistairmacdonald@boyerplanning.co.uk)

Appendix 1

Land on the South and East side of Bristol Road, Whitchurch, Bristol, BS14 0PU  
6.58 acres (2.66 hectares)



Promap  
LANDMARK INFORMATION GROUP

Ordnance Survey © Crown Copyright 2017. All rights reserved. Licence number 100022432. Plotted Scale - 1:2500

John Alison Land & Research Ltd  
Plan to Scale: 1:2500

Appendix 2

Boyer

# HELAA: Call for Sites 2018

## GUIDANCE ON COMPLETING THIS FORM

Sites can be submitted for the HELAA between 12<sup>th</sup> November 2018 and 7<sup>th</sup> 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 7<sup>th</sup> 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.

<b>1. PREVIOUS SUBMISSIONS</b>
<b>a. Has this site previously been submitted?</b> No
<b>b. Previous reference number (if known):</b> N/A
<b>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?</b>  Click here to enter text.

**\*Please choose/delete where applicable**



<b>2. YOUR DETAILS</b>		
<b>a. Name:</b>	Alistair Macdonald	
<b>b. Company/organisation:</b>	Boyer	
<b>c. Address:</b>	160 Aztec, Aztec Wes, Bristol	
<b>d. Postcode:</b>	BS32 4TU	
<b>e. Telephone:</b>	0117 428 7970	
<b>f. Email:</b>	<a href="mailto:Alistairmacdonald@boyerplanning.co.uk">Alistairmacdonald@boyerplanning.co.uk</a> <a href="mailto:bristol@boyerplanning.co.uk">bristol@boyerplanning.co.uk</a>	
<b>g. Status (please mark all that apply):</b>		
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>  Redrow Homes Ltd Redrow House West Point, Great Park Road, Bradley Stoke, Bristol BS32 4QG
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.		
<b>h. Ownership details (please mark where applicable):</b>		
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"/>
<b>i. If owner/part owner, have you attached a title plan and deeds with this form?</b>	No	
<b>j. If you are not the owner of the entire site, please provide details of the (other) owner(s), if known</b>		
	Our client, Redrow Homes, hold a long term option agreement in relation to the site.	
<b>k. Does the owner (or other owner(s)) support your proposals for the site?</b>	Yes	

\*Please choose/delete where applicable

<b>3. SITE DETAILS</b>	
a. <b>Site Address:</b>	Land west of A37, Whitchurch ST613672
b. <b>Postcode (where applicable):</b>	N/A
c. <b>Current Land Use</b>	Agriculture
d. <b>Adjacent Land Use(s)</b>	Agriculture (west) Sport and Recreation (south) Residential (north and east)
e. <b>Relevant Planning History (including reference numbers, if known)</b>	N/A
f. <b>Please confirm that you have provided a site plan:</b>	Yes

<b>4. POTENTIAL USES &amp; CAPACITY</b>		
Suggested uses (please tick all that apply and where mixed use indicate % of overall site for each use)		
<b>USE</b>	<b>SELECT</b>	<b>Capacity (number of units) and indication of possible residential tenures, types and housing for different groups</b>
Residential dwellings (C3)	Yes	75 approx.
Residential – self-build dwellings only		
Other residential, e.g. student accommodation, residential care homes etc (specify)		
Office, research & development, light industrial (B1)		
General industrial (B2) / warehousing (B8)		
Sports / leisure (please specify)		
Retail		

**\*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	See section 8
Is the site subject to flooding?	No	See section 8
Is the site affected by 'bad neighbour' uses (e.g. power lines, railway lines, major highways, heavy industry)?	No	See section 8
Is there a possibility that the site is contaminated?	No	See section 8
Can satisfactory vehicular access to the site be achieved?	Yes	See section 8
Has the Highways Agency been consulted?	No	See section 8
Is the site subject to any other key constraints?	No	See section 8

### 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"/>
vii. Other (please specify):	viii. Please provide any other relevant information relating to site suitability:  Served by existing services at Whitchurch.

**\*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	See section 8
Must land off-site be acquired to develop the site?	No	See section 8
Are there any current uses which need to be relocated?	No	See section 8
Is the site owned by a developer or is the owner willing to sell?	Yes	See section 8

**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	35	40									

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

Can be delivered in the short – medium term of the emerging plan period. Land is in control by a major national housebuilder and as such can be delivered relatively quickly.

**\*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	See section 8
Does the site require significant new infrastructure investment to be suitable for development? If yes, please specify.	No	See section 8
Are there any issues that may influence the economic viability, delivery rates or timing of the development? If yes, please specify.	No	See section 8
Has a viability assessment / financial appraisal of the scheme been undertaken?	No	See section 8
Have any design work studies been undertaken?	Yes	See section 8

## 8. ADDITIONAL COMMENTS

Our client, Redrow Homes, has an option on the land and has undertaken an initial technical review. Redrow has assembled a project team as follows:

Ecology – Tylker Grange

Landscape and Green Belt Review – Liz Lake Associates

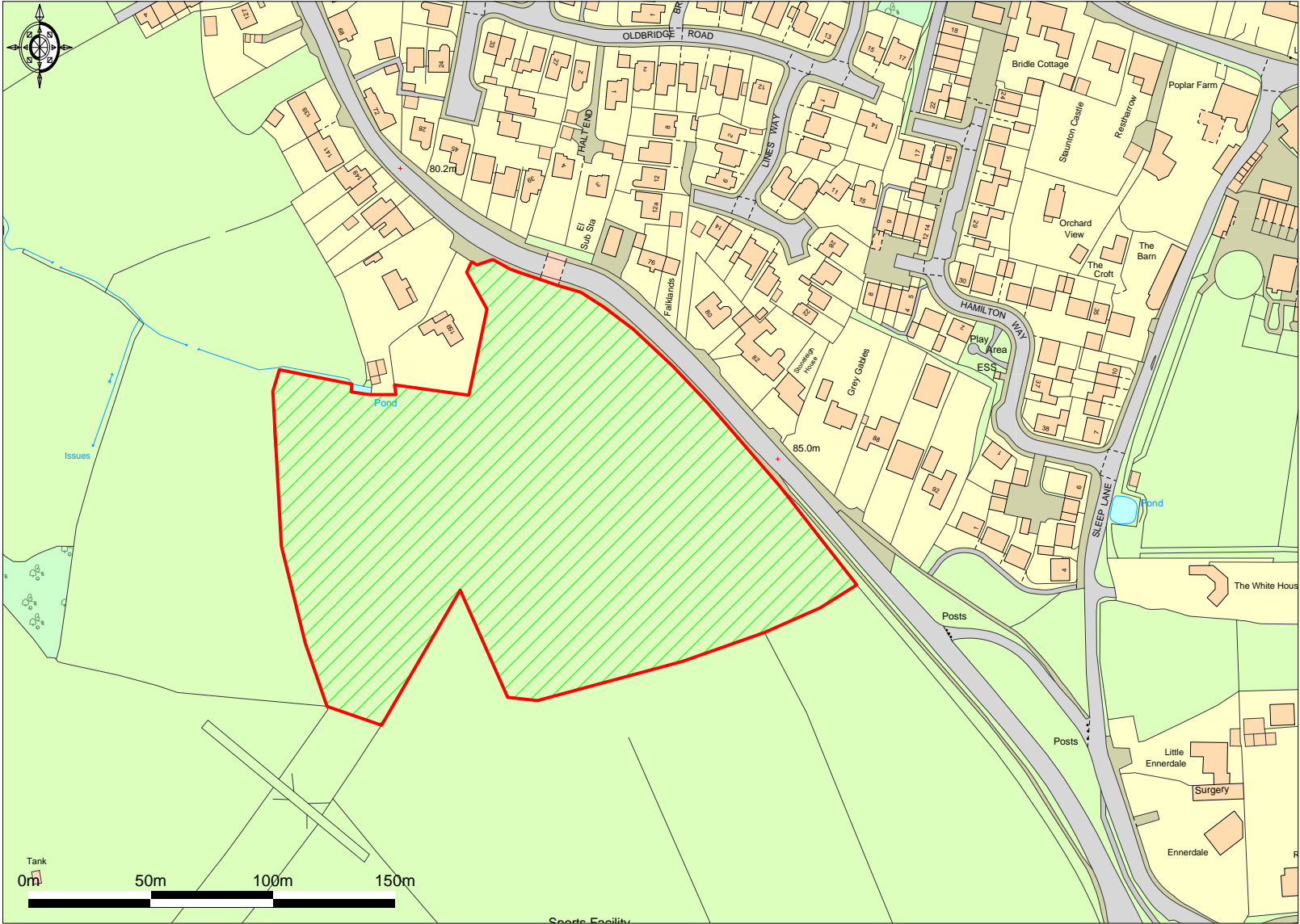
Heritage – Orion Heritage

Transport – Paul Basham Associates

The site is available and initial technical investigations find that the site is suitable for residential development. The site could deliver circa 75 dwellings in the short to medium term and be catered for within the capacity of existing infrastructure.

**\*Please choose/delete where applicable**

Land on the South and East side of Bristol Road, Whitchurch, Bristol, BS14 0PU  
6.58 acres (2.66 hectares)



Ordnance Survey © Crown Copyright 2017. All rights reserved. Licence number 100022432. Plotted Scale - 1:2500

**Promap**  
LANDMARK INFORMATION GROUP

John Alison Land & Research Ltd  
Plan to Scale: 1:2500

# HELAA: Call for Sites 2018

## GUIDANCE ON COMPLETING THIS FORM

Sites can be submitted for the HELAA between 12<sup>th</sup> November 2018 and 7<sup>th</sup> 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 7<sup>th</sup> 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.

<b>1. PREVIOUS SUBMISSIONS</b>
<b>a. Has this site previously been submitted?</b> No
<b>b. Previous reference number (if known):</b> N/A
<b>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?</b>
Click here to enter text.

**\*Please choose/delete where applicable**

<b>2. YOUR DETAILS</b>		
<b>a. Name:</b>	Alistair Macdonald	
<b>b. Company/organisation:</b>	Boyer	
<b>c. Address:</b>	160 Aztec, Aztec Wes, Bristol	
<b>d. Postcode:</b>	BS32 4TU	
<b>e. Telephone:</b>	0117 428 7970	
<b>f. Email:</b>	<a href="mailto:Alistairmacdonald@boyerplanning.co.uk">Alistairmacdonald@boyerplanning.co.uk</a> <a href="mailto:bristol@boyerplanning.co.uk">bristol@boyerplanning.co.uk</a>	
<b>g. Status (please mark all that apply):</b>		
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>  Redrow Homes Ltd Redrow House West Point, Great Park Road, Bradley Stoke, Bristol BS32 4QG
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.		
<b>h. Ownership details (please mark where applicable):</b>		
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"/>
<b>i. If owner/part owner, have you attached a title plan and deeds with this form?</b>	No	
<b>j. If you are not the owner of the entire site, please provide details of the (other) owner(s), if known</b>		
	Our client, Redrow Homes, hold a long term option agreement in relation to the site.	
<b>k. Does the owner (or other owner(s)) support your proposals for the site?</b>	Yes	

\*Please choose/delete where applicable



<b>3. SITE DETAILS</b>	
a. <b>Site Address:</b>	Land west of A37, Whitchurch ST613672
b. <b>Postcode (where applicable):</b>	N/A
c. <b>Current Land Use</b>	Agriculture
d. <b>Adjacent Land Use(s)</b>	Agriculture (west) Sport and Recreation (south) Residential (north and east)
e. <b>Relevant Planning History (including reference numbers, if known)</b>	N/A
f. <b>Please confirm that you have provided a site plan:</b>	Yes

<b>4. POTENTIAL USES &amp; CAPACITY</b>		
Suggested uses (please tick all that apply and where mixed use indicate % of overall site for each use)		
<b>USE</b>	<b>SELECT</b>	<b>Capacity (number of units) and indication of possible residential tenures, types and housing for different groups</b>
Residential dwellings (C3)	Yes	75 approx.
Residential – self-build dwellings only		
Other residential, e.g. student accommodation, residential care homes etc (specify)		
Office, research & development, light industrial (B1)		
General industrial (B2) / warehousing (B8)		
Sports / leisure (please specify)		
Retail		

**\*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	See section 8
Is the site subject to flooding?	No	See section 8
Is the site affected by 'bad neighbour' uses (e.g. power lines, railway lines, major highways, heavy industry)?	No	See section 8
Is there a possibility that the site is contaminated?	No	See section 8
Can satisfactory vehicular access to the site be achieved?	Yes	See section 8
Has the Highways Agency been consulted?	No	See section 8
Is the site subject to any other key constraints?	No	See section 8

### 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"/>
vii. Other (please specify):	viii. Please provide any other relevant information relating to site suitability:  Served by existing services at Whitchurch.

**\*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	See section 8
Must land off-site be acquired to develop the site?	No	See section 8
Are there any current uses which need to be relocated?	No	See section 8
Is the site owned by a developer or is the owner willing to sell?	Yes	See section 8

**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	35	40									

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

Can be delivered in the short – medium term of the emerging plan period. Land is in control by a major national housebuilder and as such can be delivered relatively quickly.

**\*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	See section 8
Does the site require significant new infrastructure investment to be suitable for development? If yes, please specify.	No	See section 8
Are there any issues that may influence the economic viability, delivery rates or timing of the development? If yes, please specify.	No	See section 8
Has a viability assessment / financial appraisal of the scheme been undertaken?	No	See section 8
Have any design work studies been undertaken?	Yes	See section 8

## 8. ADDITIONAL COMMENTS

Our client, Redrow Homes, has an option on the land and has undertaken an initial technical review. Redrow has assembled a project team as follows:

Ecology – Tylker Grange

Landscape and Green Belt Review – Liz Lake Associates

Heritage – Orion Heritage

Transport – Paul Basham Associates

The site is available and initial technical investigations find that the site is suitable for residential development. The site could deliver circa 75 dwellings in the short to medium term and be catered for within the capacity of existing infrastructure.

**\*Please choose/delete where applicable**

[REDACTED]

---

**From:** Tim Reynolds [REDACTED]  
**Sent:** 04 January 2019 17:34  
**To:** Local Plan  
**Subject:** Proposed housing Whitchurch

**Categories:** Green Category

Hi,

Having attended a number of local community meetings about the proposed housing development and related infrastructure near Whitchurch village, I can confidently say that this is not the village for such extreme development. We're a very historic village and community with an abundance of beautiful countryside. To put such a development here would be catastrophic to the surroundings.

The a37 is already a hazard to the people in the area because of increased emissions from congestion and risk to young children crossing the road. Putting further houses here will only exasperate the problem!

We have already knelt and accepted the horse world development and yet, this has now also been proposed!? Completely unnecessary in my opinion.

Leave our village alone!

Regards

Tim Reynolds

Sent from my iPhone

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	Mr
First Name	P	First Name	Chris
Surname	Rigg	Surname	Beaver
Job Title <i>(only if applicable)</i>		Job Title	Director
Organisation <i>(only if applicable)</i>		Organisation	PlanningSphere Ltd
Email		Email	chris@planningsphere.co.uk
Address	Bridge Place Farm	Address	Coworking Bath, The Guild, High Street, Bath
	Camerton		
Postcode	BA2 0PS	Postcode	BA1 5EB
Date	December 2018	Date	December 2018

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.

YES

**Part 2:**

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

Land at Bridge Place Farm, Camerton proposed for self-build plots:

- Policy SS1 – focused approach avoiding the Green Belt
- Policy SS2 – more dispersed approach avoiding the Green Belt
- Policy SS3 - combination of locations outside and within the Green Bel
- Policy DM5 – approaches for the delivery of self-build plots

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

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

Please refer to the accompanying Representation Statement (with Appendices) submitted with this form.

*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)**

---

# Representation in response to BANES Council's Issues & Options Consultation: Winter 2018

---

**Client:** Mr P Rigg

**Date:** December 2018

**Site:** Land at Bridge Place Farm, Camerton





## **Contents**

### **Sections**

- 1.0 Introduction
- 2.0 Relevant background information
- 3.0 Response to the Consultation
- 4.0 Suitability of Land at Former Recreation Ground
- 5.0 Conclusions

### **Appendices**

- A Site Location Plan
- B Photosheet
- C Extract from EA Flood Map for Planning

## **1.0 Introduction**

- 1.1 PlanningSphere has been instructed to make representations to the emerging Bath and North East Somerset (BANES) Local Plan 2016-2036 on behalf of the owners of land at Bridge Place Farm, Camerton.
- 1.2 The subject site is being promoted for circa 4-5 No. serviced self-build plots and has previously been promoted through the Place Making Plan process.
- 1.3 The representations should also be read with the following appended documentation:
  - Appendix A: Site Location Plan
  - Appendix B: Annotated Site Photographs (2014 and 2017)
  - Appendix C: Extract from Flood Map for Planning.

---

## **2.0 Relevant Background Information**

### **Site Description**

- 2.1 The subject site extends to circa 0.54ha. The site is located in the village of Camerton off of Camerton Hill to the east of the residential development known as The Daglands and to the south of the Cam Brook and Bridge Place Road.
- 2.2 The site comprises a parcel of grazing land situated between a public footpath and track to the north and the Cam Brook to the south. Bridge Place Farm and associated outbuildings and ménage lie to the south east of the site.
- 2.3 A new priority junction access was installed in 2017 pursuant to planning permission 15/5003/FUL.
- 2.4 The site lies in open countryside but outside the Green Belt which terminates to the north of the Cam Brook. Part of the site lies in flood zones 2 and 3, but a significant portion of the southern part of the site lies with flood zone 1.

### **Proposal**

- 2.5 The southern part of the application, which lies outside the river Cam floodplain, has potential to accommodate up to 5 self-build plots. The plots could be serviced from a private drive access from the new access road, which could be upgraded to adoptable standards.
- 2.6 The plots would be provided as full serviced plots to be built to a pre-determined design code. In the event that the site is allocated for self-building housing, and outline planning permission is granted, the plots will be offered to people who have registered their details on the Council's statutory self-build register.

---

### 3.0 Response to the Consultation

- 3.1 Our response to the consultation is focused solely on the matter of self-build, as set out under draft Policy DM5 – approaches for facilitating the delivery of self-build plots.
- 3.2 National planning policy and guidance is set out in the NPPF (2018) and web-based guidance in the NPPG (from 2014). There is a strong focus upon housing delivery, which has been further emphasised in the Housing White Paper (2017).
- 3.3 The benefits of self-build housing as a way of increasing choice and creating a more diverse and a resilient housing market were identified in the 2017 Housing White Paper and this has been translated into both the NPPF (Paragraph 61 and associated footnote 26) and NPPG. Furthermore, legislation requires Councils to maintain a self-build housing register, and LPAs are encouraged to support self-build opportunities.
- 3.4 For ease of reference paragraphs 61 (and footnote 26) and 84 of the revised NPPF are set out below:

*61. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and **people wishing to commission or build their own homes** <sup>26</sup>.*

*Footnote 26: Under section 1 of the Self Build and Custom Housebuilding Act 2015, local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building. **They are also subject to duties under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand.** Self and custom-build properties could provide market or affordable housing.*

(our emphasis in **bold**)

- 3.5 Paragraph 81 of the NPPF states:

*81. **Planning policies** and decisions **should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements**, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, **and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.***

(our emphasis in **bold**)

- 3.6 National Planning Practice Guidance (NPPG) was published on 6th March 2014 and provides a web-based source of supporting guidance to supplement Policies in the NPPF. In response to the question “*How can relevant authorities increase the number of planning permissions which are suitable for self-build and custom-build housing?*” NPPG: Paragraph: 025 (Reference ID: 57-025-201760728 ) states:

***Relevant authorities should consider how they can best support self-build and custom housebuilding in their area. This could include:***

- ***developing policies in their Local Plan for self-build and custom house building;***
- ***using their own land if available and suitable for self-build and custom housebuilding and marketing it to those on the register;***
- ***engaging with landowners who own sites that are suitable for housing and encouraging them to consider self-build and custom housebuilding and facilitating access to those on the register where the landowner is interested; and***
- ***working with custom build developers to maximise opportunities for self-build and custom housebuilding***

(our emphasis in **bold**)

- 3.7 The Self-Build and Custom Housebuilding Regulations 2016 have allowed local authorities to set local eligibility criteria (“a local connection test”). These are divided into:

- Part 1 – people who meet the local connection test and the basic eligibility (as listed in the 2016 Regulations). This part of the register keeps track of local demand. The Council will need to consider the number of registrations when consider how to provide serviced plots for self and custom-build projects.
- Part 2 – people without a local connection but meet the basic eligibility. This part of the register keeps track of general demand for self-build and custom-build and will inform planning policy and the Council’s overall approach to self-build and custom housebuilding. There is no requirement for the Council to grant sufficient development permissions for serviced plots of land to meet this demand.

- 3.8 The Register is run on an annual basis. Each Base Periods starts from the 31<sup>st</sup> of October.

- 3.9 Data collected on a district-wide basis has been recorded as follows:

<b>Base Period</b>	<b>Number of entries</b>
1 (ending 30/10/2016)	463
2 (ending 30/10/2017) Part 1 only	189
3 (ending 30/10/2018)	n/k

### **Representations to the Options Consultation Paper**

- 3.10 Self and custom-build is an important sub-sector of the housing market as it is a form of housing provision that seeks diversify the new homes market away from the volume home builder sector.
- 3.11 Paragraph 8.7.2 of the consultation document correctly states that PMP Policy H4 encourages self-build, but it does not create a policy environment that directly facilitates delivery of self and custom-build housing. There is also an acknowledgement that only a small number of self-build homes are being brought forward within existing Housing Development Boundaries, which will not meet the level of demand, as quantified in statutory BANES Self-Build Register, as noted above. Indeed, the Self-Build Register itself is unlikely to capture the real demand for self and custom-build homes as it is not well publicised, and at present there is no track record delivery within BANES administrative district for the delivery of self or custom build schemes.
- 3.12 Paragraph 8.7.4 of the consultation examples cites examples from other Council areas where self/custom-build is subject to a % requirement above a certain minimum greenfield site threshold, and other examples of Council's taking a more proactive role by purchasing or using their own land to promote their own schemes.
- 3.13 Given the constrained nature of the BANES administrative district, and to address the potential problem of speculative / volume home builders being able to outbid speculative and custom-build providers, because speculative developers also make a return on building as well land value uplift, we consider that the most appropriate approach for the delivery small-scale self-build, and small and larger scale custom-build schemes, would be for the Council to formulate a 'rural exceptions' form of self and custom-build provision in suitable locations that are adjacent to existing Housing Development Boundaries and other appropriate locations as well as making self and custom-build allocations.

---

## **4.0 Suitability of the Land at Bridge Palace Farm**

- 4.1 The land at Bridge Place Farm, Camerton is identified in the accompanying Site Location Plan. It is proposed that the site could comfortably support between 4-5 self-build/custom-build dwellings on the southern part of the site.

### **Transport and Access**

- 4.2 The site is accessed off Camerton Hill via an existing priority junction. The landowner controls land either side of the existing access which would enable the remodeling of the existing access bellmouth to achieve 2.4 x 43m visibility splays in each direction. There is also an opportunity to provide footways.
- 4.3 The site lies centrally within Camerton in close proximity to the primary school. There is also bus access to Bath, which is approximately 10km from Camerton.
- 4.4 There is an existing public footpath that runs around the site that could be retained in situ as part of any development proposal.

### **Utilities and Services**

- 4.5 The site benefits from full mains utilities including foul drainage, gas, electricity and telecoms.

### **Flood Risk**

- 4.6 The Environment Agency Indicative Flood Map indicates that only a relatively small area of the northern part of the site directly adjacent to the Cam Brook is within Flood Zone 3 and therefore not suitable for development. There is sufficient land available for up to 4-5 dwellings in the remainder of the site which is not affected by any flood risk constraints.

### **Ecology and Biodiversity**

- 4.7 The application site is grazed and managed, and there are no known protected species

present. The site is open with tree root protection zones only affecting part of the site boundary.

- 4.8 The Cam Brook and surrounding vegetation may function as a bat commuting corridor. This will be established by an ecology walkover survey in due course, however, on the basis of an initial site inspection the site is relatively unconstrained.

### **Landscape**

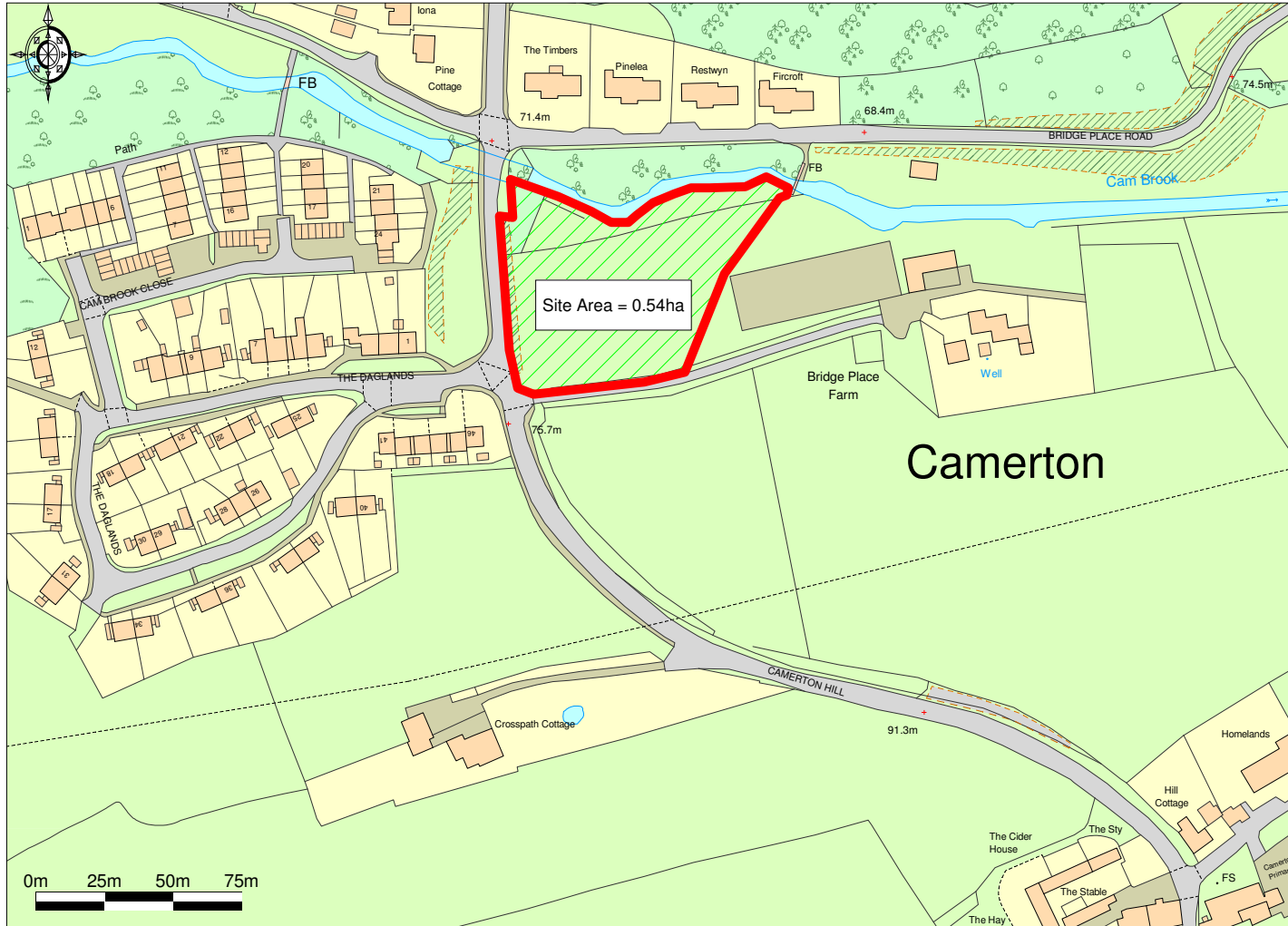
- 4.9 The Bath / Bristol Green Belt terminates to the north of the Cam Brook. The site is not subject to any landscape or other site specific designations. The site lies within the Cam Brook valley floor and is well contained in landscape terms. Development could be absorbed into the wider landscape, subject to appropriate design and landscaping mitigation.



## **5.0 Conclusions**

- 5.1 The Issues and Options Consultation has correctly identified that it will be necessary for the replacement Local Plan to include policy that will enable the deliver of self and custom-build to replace PMP Policy H4, and to meet statutory and national policy requirements.
- 5.2 The analysis set out in Section 3 of this statement suggests that in the highly constrained BANES administrative district, it would be appropriate for the Council to allocation land for self and custom-build plots, and to also evolve a rural exceptions type criteria-based policy to enable self and custom-build developments to come forward in locations adjacent to but outside Housing Development Boundaries, and other suitable locations that meet accessibility criteria.
- 5.3 We submit that our client's land at Bridge Place Farm should be allocated for self-build housing.

# Land at Bridge Place Farm, Camerton BA2 0PS



Ordnance Survey © Crown Copyright 2015. All rights reserved. Licence number 100022432. Plotted Scale - 1:2500



Drg No. 1497.001

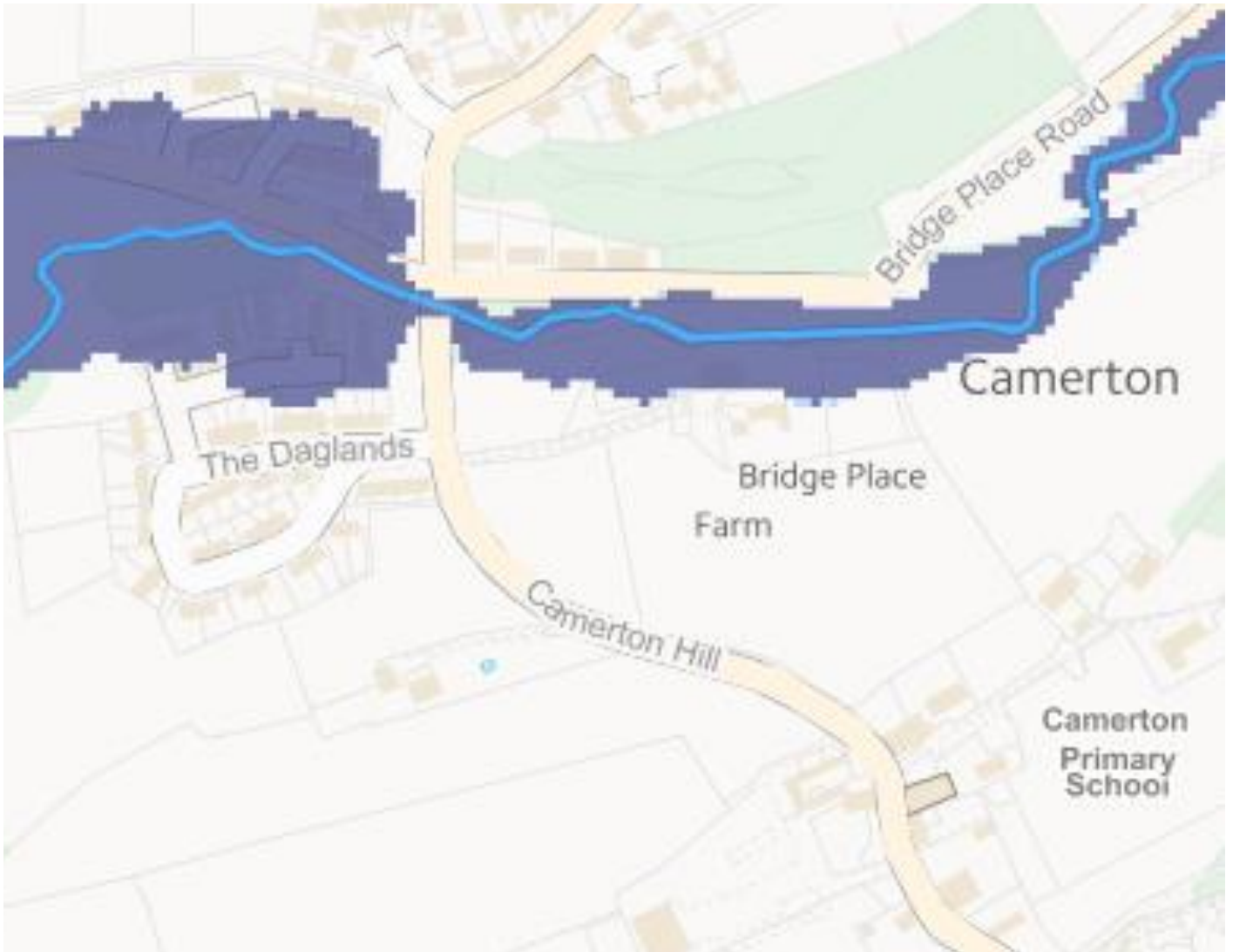


**Photos 1 - 3:** The subject greenfield site lies at the base of the Cam valley centrally within the village. The site is well contained by existing vegetation and has defensible boundaries on all sides. The site has capacity to accommodate 4-5 self-build/custom-build plots outside the flood-plain.



**Photo 4:** This photograph shows the recently installed new access pursuant to planning permission 15/5003/FUL. This is access which has been provided to serve the existing farm has sufficient capacity to serve as an access to 4 No. self build plots.

**Appendix C: Extract from EA Flood Map  
Land at Bridge Place Farm, Camerton BA2 0PS**



## Paul Rixon

---

**From:** Rixon, Judith <[REDACTED]>  
**Sent:** 04 January 2019 11:22  
**To:** Transport Planning  
**Cc:** Local Plan  
**Subject:** New orbital road

**Categories:** Green Category

Planning  
services

18

HOLFORD COURT  
Bath & North East Somerset  
Council

WHITCHURCH

Lewis  
House

BRISTOL BS14 9LT  
Manvers  
Street

0

4/01/2019  
Bath  
Somerset  
BA1 1JG

**Ref: Bath & North East Somerset Council Local Plan 2016-2036**

Following on from your recent 'consultation' meeting at Whitchurch Community Centre on the 19<sup>th</sup> November, I am writing to register my concerns and strong disapproval of the planned developments south of Whitchurch, the South Orbital Highway Link and the proposed Park and Ride on the A37 as outlined in your Local Plan 2016-2036.

I believe that this proposal will have a serious and long-lasting negative effect on the Green Belt south of Bristol and will lead to Urban Sprawl. This is clearly indicated in your own document entitled "*Local Plan: Part 1 Green Belt Assessment: Whitchurch Strategic Development Location*".

The Local Plan will have a devastating impact on cells 52D, E, F & G as shown in the Green Belt Assessment. Each of which makes a major contribution to checking the sprawl of Bristol.

Furthermore, the housing development will mean the Village of Whitchurch will become sandwiched between the City of Bristol and the New Garden Community and will, over time, lose all identity.

It's clear to all that 2,500 homes will bring with it well over 9,000 new residents and a large increase in the number of cars and commercial vehicles, all adding to already high air pollution figures and an unwelcome increase in traffic. Local services are already at a stretch in the area and recent developments on the old Horse World site and the construction of White Church Court near Queen Charlton have added to this. Further development, without adding additional facilities such as Doctors, Dentists and local shops will push the existing amenities to breaking point and have a major impact on those already living in the area.

In addition to the above, the land under consideration is home to a diverse range of wildlife whose habitats are forever under threat and whose disappearance could have a long term and devastating impact on the local ecology and eco systems.

In relation to the proposed South Orbital Highway Link, I can only conclude that the planners are not familiar with the local area and have no understanding of the issues already faced by local residents and road users.

Adding even more traffic to any already busy Whitchurch Lane, makes absolutely no sense and only goes to prove how out of touch the planners truly are. In fact, the councils own "*South East Bristol and Whitchurch Transport Package Options Assessment Report*" states that travel times heading west along Whitchurch Lane will increase.

I am also extremely concerned about the increase in noise and air pollution along the suggested route and fear for the health and safety of the 630 pupils of Bridge Farm Primary School whose life will undoubtedly be disrupted by this road development.

At present, the adjacent roads have a 20mph restriction in place and traffic calming measures to ensure the safety of

the children, staff and parents. The roads are also used before and after school for dropping off and picking up pupils

as well as on weekends for those using the school's facilities for sports and recreational activities.

In fact, a recent survey carried out by "20mph Bristol" in conjunction with Bristol City Council has shown that the vast majority of those asked think all schools should be protected by 20mph speed limits. Increasing the speed limit to even 30pmh as suggested, introducing more and varied traffic and restricting the amount of on-street parking in this area will have a major impact on road safety and the lives of the school's pupils.

The school has two busy road crossing points on Whitchurch Lane as well as an entrance on Half Acre Lane. Traffic in the area is already at a stand still at the start and end of the school day as these crossings are in constant use.

Funnelling more traffic along this route, especially in the rush hour periods, will only add to the situation and turn adjacent roads into "Rat Runs" as frustrated car, van and lorry drivers try to find alternate routes around the hold ups.

There are nine side roads that intersect with Whitchurch Lane along the residential section between Washing Pound Lane and The Community College. Getting in and out of many of these intersections (for example Fortfield Road, East Dundry Road and Bamfield) can be extremely difficult at busy times, causing long traffic queues to build up.

The proposed increase in traffic volumes will only add to this and it's therefore inevitable that restrictions will be put in place to stop right turns across the flow of traffic. This in itself will only add to an increase in the amount of traffic entering the residential side streets and put the health and safety of local residents at risk.

Finally, I must say that encouraging large Heavy Good Vehicles, which weigh in excess of 40 tons, to use this route is an insanity and the existing roads, which have limited room for expansion, just won't be able to cope. The impact on local residents will be insufferable and the additional noise and air pollution will degrade the quality of life as well as the physical and mental wellbeing of a great many in this community.

Turning to the proposed new Park and Ride on the A37. I am unclear who this is meant to serve and no full explanation could be given to me at the consultation.

The "*South East Bristol and Whitchurch Transport Package Options Assessment Report*" concludes that it will not improve journey times into the centre of Bristol by any significant amount. However, it will encourage more traffic from the Wells, Radstock, Midsomer Norton and Shepton Mallet areas to use the A37 and add to the issues already experienced by the residents of the smaller villages along the A37 such as Pensford and Temple Cloud where the width of the roads already cause traffic to build up at busy times.

The OAR also states that the Park and Ride would not be profitable for some time and would require subsidy. It also goes on to say that it's unlikely that a bus operator would take on the required number of buses per hour and users would have to rely on the existing 376 from Wells which runs every 30mins plus two other buses per hour if the local bus operator chooses to extend its services.

Given the above, plus the fact that no additional Bus Lanes will be provided along the A37, I must question if this is truly 'Value for Money' and if local tax payers should be asked to foot the bill!

In conclusion, I feel that within these proposals there is no indication of how the scheme will actually improve the day to day lives of those already living in the area. It does however go to show how the proposals will have a major negative impact on the green belt, the existing local residents, wildlife (and habitat), ecology, eco system, local services, traffic volumes and pollution.

As an aside, I would like to state that the way B&NES Council have gone about this consultation is a disgrace. I can't understand why given that they, along with Bristol City Council, have access to the names and addresses of all residents in the area, have not undertaken a direct mail campaign to make people aware of the proposals.

The lack of information and the way it's been disseminated is underhand and suggests that B&NES Council want to keep this process as quiet as possible. The only way most residents have found out about the proposal and consultation meetings is through Social Media, something that many elderly residents do not have access to. The cynical might go so far as to say that the fact that it's being carried out over the Festive period suggests that B&NES hope that people's focus is elsewhere and will therefore get fewer disagreements.

I sincerely hope that the views of Local Residents along with our MPs, Local Government & Parish Councillors and recently formed Pressure Groups who have already expressed their objections to this proposal are truly listened to and acted upon.

Kindest Regards

**Confidentiality Notice:**

This message may contain confidential or privileged information, or information that is otherwise exempt from disclosure. If you are not the intended recipient, you should promptly delete it and should not disclose, copy or distribute it to others.

[REDACTED]

---

**From:** Judith Rixon [REDACTED]  
**Sent:** 05 January 2019 09:22  
**To:** Local Plan  
**Subject:** Link road

**Categories:** Green Category

[REDACTED]

05/01/2019

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.

Mr Anthony Rixon  
Sent from my iPad



LF/P17-0225

4<sup>th</sup> January 2019

Planning Policy  
Bath & North East Somerset Council  
PO Box 5006  
Bath  
BA1 1JG

Dear Sir/Madam,

**Bath & North East Somerset Local Plan 2016-2036 Options Consultation (Winter 2018)**  
**Representations submitted on behalf of Robert Hitchins Ltd – Land off Stockwood Lane Whitchurch**

I have pleasure in enclosing representations to the Bath & North East Somerset Local Plan 2016-2036 Options Consultation (Winter 2018) on behalf of our client Robert Hitchins Ltd.

Each representation is submitted on an individual form and for completeness these are listed below.

- Comment Form 1 – Paras 1.2.4 - 1.2.5
- Comment Form 2 – Para 2.5.2
- Comment Form 3 – Section 3
- Comment Form 4 – Section 4 – BTH2
- Comment Form 5 – Section 6 – Whitchurch
- Comment Form 6 – Section 8 – DM1
- Comment Form 7 – Section 8 – DM5
- Comment Form 8 – Section 8 – DM7
- Comment Form 9 – Section 8 – DM8
- Comment Form 10 – Section 8 – DM14
- Comment Form 11 – Section 8 – DM15
- Comment Form 12 – Section 8 – DM16
- Comment Form 13 – Section 8.2 – CP9
- Comment Form 14 – Section 8.21 – SCR5
- Comment Form 15 – Duty to Co-operate
- Comment Form 16 – Sustainability Appraisal
- Appendix 1 – Site plan - Land off Stockwood Lane Whitchurch

I would be most grateful if you could please acknowledge receipt of these representations, a hard copy of which will follow in the post.

I would also be grateful if you could advise on the next stages of the preparation of the B&NES Local Plan.

**PLANNING | DESIGN | ENVIRONMENT | ECONOMICS**

Pegasus House, Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire, GL7 1RT  
T 01285 641717 F 01285 642348 [www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

I look forward to hearing from you concerning these matters.

Yours faithfully,



**LOUISE FOLLETT**  
**Principal Planner**  
[Louise.Follett@pegasusgroup.co.uk](mailto:Louise.Follett@pegasusgroup.co.uk)

Enc. Local Plan Representations x 16  
Appendix 1 – Site plan

Cc: Phil Hardwick – Robert Hitchins Ltd  
Sarah Hamilton-Foyn - Pegasus Group

**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		Title	<b>Mrs</b>
First Name		First Name	<b>Louise</b>
Surname		Surname	<b>Follett</b>
Job Title <i>(only if applicable)</i>		Job Title	<b>Principal Planner</b>
Organisation <i>(only if applicable)</i>	<b>Robert Hitchins Ltd</b>	Organisation	<b>Pegasus Group</b>
Email		Email	<a href="mailto:Louise.Follett@pegasusgroup.co.uk">Louise.Follett@pegasusgroup.co.uk</a>
Address		Address	<b>Pegasus House</b>
			<b>Querns Business Centre</b>
			<b>Cirencester</b>
Postcode		Postcode	<b>GL7 1RT</b>
Date		Date	<b>7<sup>th</sup> January 2019</b>

**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? Paragraph 2.5.2 Spatial Priorities**

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

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

Our clients support the Local Plan's spatial priorities in so far as they facilitate the delivery of new housing that meets the needs of both B&NES and the adjacent Wider Bristol Housing Market Area. This includes the delivery of well connected places accessible by sustainable means of transport and the timely provision of infrastructure to support growing communities.

To that end the spatial priorities of the plan should be broadened to acknowledge the role and purpose of the JSP and not focus solely on providing a spatial expression of the Council's key priorities.

*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)**

**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		Title	<b>Mrs</b>
First Name		First Name	<b>Louise</b>
Surname		Surname	<b>Follett</b>
Job Title <i>(only if applicable)</i>		Job Title	<b>Principal Planner</b>
Organisation <i>(only if applicable)</i>	<b>Robert Hitchins Ltd</b>	Organisation	<b>Pegasus Group</b>
Email		Email	<a href="mailto:Louise.Follett@pegasusgroup.co.uk">Louise.Follett@pegasusgroup.co.uk</a>
Address		Address	<b>Pegasus House</b>
			<b>Querns Business Centre</b>
			<b>Cirencester</b>
Postcode		Postcode	<b>GL7 1RT</b>
Date		Date	<b>7<sup>th</sup> January 2019</b>

**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? Section 3 – Spatial Strategy

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

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

Section 3 of the Options consultation document considers the housing requirement that the authority is required to accommodate within the plan period and the sources of supply that will meet the required number. It also considers three approaches to meeting the 'non-strategic growth' that will be allocated in the Local Plan.

Section 3 states at paragraph 3.2.1 that the JSP proposes that B&NES should provide for 14,500 new dwellings by 2036, however caution is raised over this housing requirement number as it is yet to be subject to Examination by the JSP Inspectors. The housing numbers identified in the submitted JSP have been subject to considerable objection by the development industry and it is likely that there will be robust debate at the JSP EiP concerning this matter.

Of particular concern is the fact that there appears to be an element of double counting of housing numbers as the Whitchurch Strategic Development Location (SDL) is counted towards the BANES housing need numbers in the B&NES Options (Winter 2018) consultation, whereas the JSP evidence clearly states that the exceptional circumstances justifying Green Belt releases to the south of Bristol are to help meet the Wider Bristol HMA unmet needs (**SD7A** (April 2018) para 4.11).

The JSP B&NES Housing Market Area Update (March 2018) (JSP **SD14A**) states at paragraph 5.1 that the B&NES Housing Market Area has its own bespoke need for 14,910 dwellings over the 20-year plan period. The updated March 2018 indigenous housing need figure for B&NES is therefore already greater than the quanta of development allocated to B&NES through the submitted JSP (14,500), before the unmet needs of the Wider Bristol area HMA are taken into consideration.

It is imperative that this matter is given further consideration and the housing requirement for B&NES for the plan period up to 2036 increased accordingly to meet the indigenous needs of the B&NES HMA area (identified by SD14A) by identifying an increased amount of non-strategic growth at sustainable locations, including Green Belt sites on the edge of urban areas, including sites adjacent to Bristol.

Our client also expresses concern over the intended delivery capacity for B&NES from 'non-strategic' growth of 700 dwellings. 3,000 dwellings are shown in Diagram 1: Housing Supply of Section 3 (p.10) to come from SDL's in the plan period up to 2036, however at least one SDL, Whitchurch, is subject to significant strategic infrastructure constraints, including the delivery of the new A4 – A37 South Bristol orbital road, before delivery can commence at the SDL, with first delivery anticipated no earlier than 2029.

Our client supports the view taken at paragraph 3.2.4 of the Options consultation that it would be prudent to plan for a contingency on the non-strategic sites capacity figure to allow for non-delivery of existing commitments but also the non-delivery of the SDL's at the quanta currently envisaged by the JSP evidence base.

To that end our clients site at Land off Stockwood Lane Whitchurch, shown at Appendix 1, is well placed to help meet non-strategic housing growth in the first half of the plan period. The site is available now and could contribute to the authorities five-year housing land supply once removed from the Green Belt on the adoption of the B&NES Local Plan.

Of further concern to our client is the reduction in dwelling numbers proposed at Whitchurch SDL by the JSP and the B&NES Local Plan from a total of 2,500 dwellings to 2,000 dwellings. The previous B&NES Local Plan consultation (Winter 2017) stated at para 5.04 that the JSP required the delivery of 2,500 dwellings at Whitchurch, with Diagram 5 at p.10 showing the provision of 1,600 new homes at the SDL in the plan period.

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

The corresponding West of England Joint Spatial Plan – Technical Consultation (November 2018) also reduces the overall number of dwellings to be delivered at Whitchurch to 2,000. The justification for the reduced number of dwellings at this SDL is unclear in the JSP consultation and the lack of clarity and justification is also carried forward into the B&NES Options consultation.

The Arup Emerging Strategic Planning Framework for Whitchurch (Nov 2018) shows the southern part of our clients site within the area of search for extending Whitchurch Village at Slide 4 of Figure 27 p.39, however it is not carried forward into the potential development area shown at Fig. 28 on p.40. Given the likely need for additional non-strategic sites to come forward in the plan period and the proximity of the site to Bristol and its ability to meet the Wider Bristol HMA un-met need the authority are requested to re-visit the development potential of the site.

Turning to the evidence behind the housing numbers of the JSP for B&NES there is considerable inconsistency within the published evidence base. This creates uncertainty in the plan preparation process - for interested parties and for those Examining the JSP.

The Bath HMA Strategic Housing Market Assessment Update Volume One (March 2018) identified an Objectively Assessed Need for the HMA of a total 14,910. This consisted of 14,273 Objectively Assessed Need (OAN) with an additional need for 637 (SD 14A). An update on the overview of housing need for the Wider Bristol area has also been undertaken (SD 14C). The overall need is calculated at 90,484, comprising of 86,959 OAN and an additional need of 3,525 for older people to remain in households. In total therefore, the OAN for West of England was established at 101,232, with an additional need for 4,162 for older people, providing a total of **105,394** dwellings over the 20-year plan period. This document provides a more up-to date picture of the existing housing market than that which has informed the emerging housing requirement.

At the same time, West of England Topic Paper Housing Requirement published in April 2018 (SD 14M) provides a total OAN of 98,646 (rather than the 101,232 identified above). Consequently, the document provides a housing target of 102,809 made up of 90,485 in Wider Bristol and 12,324 in B&NES (excluding the need for 2,586 student homes in B&NES) and further identifies that the provision will be made for 105,500 to ensure flexibility which only just covers the need for students in B&NES.

This is then compared to the evidence gathered in the West of England Joint Spatial Plan submitted for examination in April 2018 (SD 1A). The document identifies an OAN of 97,800 which doesn't accord with either of the preceding figures (101,232 or 98,646). In terms of the housing requirement, it provides a requirement of 102,200 homes which doesn't accord with either of the above figures (105,394 or 102,809) and indicates that the provision will be made for 105,500 dwellings.

Given the above inconsistencies in the JSP evidence the housing requirement for B&NES is still unclear and will only be determined through the Examination in Public.

While the JSP will provide the Strategic Policies for the WoE authorities and identify Strategic Development Locations (SDL's) the delivery tool for JSP policies will remain the individual authorities Local Plans. The Local Plans will also provide site specific policies for the delivery of the SDL's as well as allocate non-strategic growth required within their area in the plan period up to 2036.

Paragraph 60 of the new NPPF (2018) identifies that Local Planning Authorities should establish their minimum housing need using the standard method set out in the PPG 2018. As identified above, the JSP was submitted prior to 24th January 2019 and therefore will benefit from the transitional arrangements of paragraph 214 of the NPPF and be required to meet the full objectively assessed need rather than Standard Method.

As a comparison, for the preparation of the B&NES Local Plan under the Standard Method using 2015 household formation rates, the base date of 2019, and the most recent 2017 affordability ratio the overall housing need figure for West of England is 115,510, exceeding the West of England JSP Policy 1 housing requirement of 105,500 by circa 10,000 dwellings across the plan period. The housing need identified by the JSP authorities Strategic Housing Market Assessment updates is therefore constrained below that which will be required to be considered by the emerging Local Plans and does not provide the overall housing need.

The above JSP evidence-based documents provide a limited consideration of the current housing affordability (with the 2017 house prices to earnings ratio of 9.3 across the West of England area) and assume a lower economic growth. These further constrain the delivery of market housing and consequently impact the overall quantum of the affordable housing in the future.

The above evidence does not provide a clarity in the overall housing need figure. On such basis, it is argued that the proposed housing distribution breakdown submitted in Policy 1 of the West of England Joint Spatial Plan (November 2017) and subsequently taken forward in the Bath and North East Somerset Local Plan 2016-2036 Options Consultation (Winter 2018) does not represent the actual up-to-date housing need across the area. At the same time, it is argued that the evidence base underpinning the B&NES housing requirement figure is not reliable as it is based on the 2015 evidence-based document that provides a limited account for affordability and economic growth in the area.

Paragraph 3.3.1 states that job growth in B&NES is likely to take place at SDL's, including Whitchurch however the JSP evidence paper WED 004B states that;

*"A large employment allocation has not been made at this SDL in light of its proximity to the Bristol urban area and the employment opportunities available there, facilitated by sustainable transport improvements to the City. However, more local employment opportunities will be pursued via the Local Plan."*

While our client welcomes planning for economic growth there is no uplift in the JSP submitted housing requirement (and therefore current B&NES housing requirement) for economic growth and there is clearly a lack of co-ordination between the aspirations of those preparing the JSP and the B&NES local plan with regard to the type of employment to be provided at the SDL.

Section 3.8 describes the 'Emerging Approach' to meeting non-strategic growth across the B&NES administrative area with paragraph 3.8.1 stating that exceptional circumstances for the release of Green Belt sites for non-strategic growth;

*" ....will only exist if the requirement cannot be met sustainably on land outside the Green Belt".*

Our client considers that Green Belt land in sustainable locations adjacent to the Bristol urban fringe should be considered for release for non-strategic growth, especially where it is situated at settlements that provide a range of services and facilities, such as a primary school, (as per paragraph 3.8.3) and where sustainable transport options already exist and will only be enhanced through the delivery of the JSP SDL's. All these criteria apply to our client's site at Land Off Stockwood Lane Whitchurch which is attached at Appendix 1.

It is considered that the release of land for development in the Bristol Green Belt should be thoroughly considered by the Local Plan before any B&NES un-met need is exported to other authorities such as Mendip under the Duty to Co-operate.

Our client therefore fully supports option SS3 – 'Combination of locations outside and within the Green Belt' for the location of non-strategic growth for the Local Plan 2016-2036.

Our client also considers that B&NES should plan for an enhanced non-strategic growth figure through the Local Plan (over and above the 700 currently proposed in the JSP), in accordance

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



with their preferred spatial strategy, given the critical dependency on the delivery of significant strategic infrastructure and long lead in times at the proposed JSP SDL's at Witchurch and Keynsham which may result in the SDL's nor delivering the quanta of development proposed within the plan period.

*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**

**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		Title	<b>Mrs</b>
First Name		First Name	<b>Louise</b>
Surname		Surname	<b>Follett</b>
Job Title <i>(only if applicable)</i>		Job Title	<b>Principal Planner</b>
Organisation <i>(only if applicable)</i>	<b>Robert Hitchins Ltd</b>	Organisation	<b>Pegasus Group</b>
Email		Email	<a href="mailto:Louise.Follett@pegasusgroup.co.uk">Louise.Follett@pegasusgroup.co.uk</a>
Address		Address	<b>Pegasus House</b>
			<b>Querns Business Centre</b>
			<b>Cirencester</b>
Postcode		Postcode	<b>GL7 1RT</b>
Date		Date	<b>7<sup>th</sup> January 2019</b>

**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?                      Section 4 - Policy BTH2**

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

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

Our clients raise concern that the emerging policy position for Bath to provide an additional 300 additional dwelling units is being based on intensification, both of existing housing areas and existing allocations. Moreover, consideration is also to be given to 'previously discounted' sites within the City.

While the NPPF (2018) encourages the best use of land, including brownfield sites (para 117) in sustainable locations, the evidence to demonstrate that this quantum of development can effectively be delivered within the City has not been published to justify the Council's emerging policy position.

The swift delivery of new homes on brownfield sites within a historic City cannot be guaranteed owing to the existence of multiple contamination constraints, therefore an over reliance on new homes from this source of supply in the Council's five-year housing land supply will be both questionable and challengeable unless the effectiveness and achievability of the approach is fully justified by robust evidence.

*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 online: [www.bathnes.gov.uk/localplan](http://www.bathnes.gov.uk/localplan)**

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

**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		Title	<b>Mrs</b>
First Name		First Name	<b>Louise</b>
Surname		Surname	<b>Follett</b>
Job Title <i>(only if applicable)</i>		Job Title	<b>Principal Planner</b>
Organisation <i>(only if applicable)</i>	<b>Robert Hitchins Ltd</b>	Organisation	<b>Pegasus Group</b>
Email		Email	<a href="mailto:Louise.Follett@pegasusgroup.co.uk">Louise.Follett@pegasusgroup.co.uk</a>
Address		Address	<b>Pegasus House</b>
			<b>Querns Business Centre</b>
			<b>Cirencester</b>
Postcode		Postcode	<b>GL7 1RT</b>
Date		Date	<b>7<sup>th</sup> January 2019</b>

**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? .....Section 6 – Whitchurch

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

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

Paragraph 6.1 states that 2,000 new homes at the West of England (WoE) Joint Strategic Plan (JSP) Whitchurch Strategic Development Location (SDL) are deliverable, however this figure is arrived at from work undertaken by Arup in the Whitchurch Emerging Strategic Planning Framework document (Nov 2018) (WSF). The WSF calculates the deliverable quanta of 2,000 dwellings from the area proposed for development to the south of the village. The document does not indicate that it includes any figure for new dwellings that may come forward for development from land to the east of Whitchurch village which is also identified in the WSF document as suitable for development.

Land to the east of the village could be included as part of the SDL as the JSP does not state where the SDL should be, it is for the B&NES Local Plan to determine the location of the SDL.

Therefore, the land shown in the WSF as a suitable expansion of the village to the east and north of the proposed new Bristol south orbital road could come forward either;

- (i) as part of the Whitchurch SDL or;
- (ii) as non-strategic growth

Either option would be delivered through detailed planning policy in the B&NES Local Plan.

Including the land to the east and north of the village as part of the Whitchurch SDL would increase the quanta of development that could come forward at Whitchurch SDL helping to meet the unmet needs of the wider Bristol HMA given the area is situated immediately to the south of the administrative area of Bristol City.

Land off Stockwood Lane, as a discrete site, could come forward and deliver early in the plan period as this would then not be time constrained with regard to the delivery of significant strategic infrastructure and would contribute to the B&NES five-year housing land supply, delivering market and affordable homes in the first half of the plan period.

Paragraph 6.4.1. states that the WSF forms, '*an important part of the evidence base for the allocation of the development of the area within the Local Plan*' – however our client notes that the WSF is a strategic high-level document that considers the possible development capacity of land to the south of the proposed Bristol southern orbital road. It does not provide any master planning for the area that is potentially developable to the north and east of the village which could also provide capacity for either the SDL or B&NES non-strategic growth. The WSF therefore potentially masks the quanta of development that could come forward at Whitchurch. The WSF also uses very general language stating on p.48;

'*The land to the south east of Whitchurch is estimated to be able to provide;*

- *Up to 2000 dwellings over two plan periods with 1600 potentially deliverable up to 2036' (emphasis added).*

#### WCH1 Policy Options for the Strategic Planning Framework

Our client considers that given it will be necessary to redraw the Green Belt boundary through the B&NES Local Plan at Whitchurch to accommodate the JSP SDL and/or non-strategic growth that there is scope to consider the release of those parts of the Green Belt between Bristol and Whitchurch that perform poorly in terms of purposes of the Green Belt for development under Option 1. The requirements of NPPF (2018) para 139, especially criteria e) and f) are brought to the attention of the Council with regard to any redrawing of the Green Belt boundary at Whitchurch.

It is also considered that Option 3, which includes the expansion of the village to the east could be supported if it was supplemented by the consideration of land to the north of the village, as well as

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

land to the east.

It is noted that the area proposed to the east of Whitchurch for development in the WSF would result in a narrower Green Belt gap between Whitchurch and Bristol than if part of our client's site at Land off Stockwood Lane were to come forward for development.

Paragraph 6.4.3 states that the emerging B&NES Local Plan preferred option is largely based in Option 3 and the creation of a new settlement – our client considers it premature of the Council to have taken a position on this matter when WCH1 requests comments from consultees on the three options proposed.

#### WCH2 Policy Options for Whitchurch SDL: Garden Community Principles

Our clients site at Land off Stockwood Lane, shown at Appendix 1, to the immediate north of Whitchurch Village provides a readily available site that could contribute to the Whitchurch SDL or B&NES non-strategic growth.

With regard to Garden Community Principles our client considers that it is important that where land is released from the Green Belt that best use is made of a site; especially where that site is sustainably located on existing public transport corridors, in close proximity to jobs and services and helping to meet the market and affordable unmet needs of the immediately adjacent Housing Market Area in accordance with NPPF (2018) paragraph 24.

#### WCH3a Development Sub Options

Our client notes that the sub options relate to the WSF master planned area to the south of Whitchurch and that the land to the east of Bristol is not included in layouts on pp.106 – 107. Our client would support a more organic form of development rather than one solely based on solar gain.

#### WCH4 Proposed Policy Approach for Housing

Our client considers that should smaller deliverable sites be included in the overall SDL quantum of development at Whitchurch that they should not be required to make provision for self-build housing. Smaller deliverable sites should be released from the Green Belt through the B&NES Local Plan allowing for early delivery at the SDL. Such small sites would not be dependent on the delivery of new strategic infrastructure such as the new south Bristol Orbital Road and would allow for the SDL to start delivering before the current estimated date of 2029.

#### WCH5 Proposed Policy Approach for Economic Development and Jobs

Our client notes that although the JSP consultation document WED004B states on p.3 for Whitchurch SDL '*employment spaces at a quantum and of a type to be determined through the Local Plan*' it also states the following;

**“A large employment allocation has not been made at this SDL in light of its proximity to the Bristol urban area and the employment opportunities available there, facilitated by sustainable transport improvements to the City. However, more local employment opportunities will be pursued via the Local Plan”.**

Table 4.1 of the JSP Consolidated Sustainability Appraisal (November 2018) (WED 009) also identifies that there will be no strategic employment allocation at this SDL, our client raises concern therefore, in the light of these statements in the JSP consultation documents published for consultation alongside the B&NES Local Plan Options (Winter 2018) consultation, that there appears to be a lack of co-ordination between those preparing the emerging B&NES Local Plan and the JSP with regard to the nature of employment land to come forward at the Whitchurch SDL.

The JSP, and its associated infrastructure requirements, has been prepared on the basis of no provision for B8 (Industrial or warehouse/ distribution uses) or substantial B1 (small offices and light industrial units) at the Whitchurch SDL, yet the B&NES consultation document (Winter 2018) states that the Local Plan Policy approach will consider and specify the combination of

employment uses to come forward within the development area.

WCH7 Proposed Policy Approach for Transport

Our client considers that small deliverable standalone sites released from the Green Belt through the B&NES Local Plan as part of either the Whitchurch SDL or as B&NES non-strategic growth, which can be accommodated on the existing highway network and make use of the existing public transport networks should be allowed to come forward in advance of the delivery of the Whitchurch Park and Ride and the multi modal A4-A37 south Bristol link.

The delivery of new market and affordable housing from small sites should not be predicated on the delivery of large scale strategic infrastructure which limits development until the later end of the plan period with first delivery estimated at 2029.

WCH8 Proposed Policy Approach for Green Infrastructure

Our client's site at Land off Stockwood Lane provides the opportunity to deliver new Green Infrastructure linkages to enhance existing assets and achieve real benefits for people and wildlife.

WCH10 Proposed Policy Approach for zero carbon

Our client considers that small deliverable standalone sites released from the Green Belt through the B&NES Local Plan as part of either the Whitchurch SDL or as B&NES non-strategic growth, such as land off Stockwood Lane, should not be required to achieve zero carbon targets.

While there are aspirations to deliver zero carbon development at the wider SDL the need for B&NES to maintain a five year housing land supply and to help address un-met housing need in the Wider Bristol HMA are pressing factors in arguing that smaller sustainable sites that can deliver quickly should be allowed to come forward in the first half of the plan period once removed from the Green Belt.

*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**

**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		Title	<b>Mrs</b>
First Name		First Name	<b>Louise</b>
Surname		Surname	<b>Follett</b>
Job Title <i>(only if applicable)</i>		Job Title	<b>Principal Planner</b>
Organisation <i>(only if applicable)</i>	<b>Robert Hitchins Ltd</b>	Organisation	<b>Pegasus Group</b>
Email		Email	<a href="mailto:Louise.Follett@pegasusgroup.co.uk">Louise.Follett@pegasusgroup.co.uk</a>
Address		Address	<b>Pegasus House</b>
			<b>Querns Business Centre</b>
			<b>Cirencester</b>
Postcode		Postcode	<b>GL7 1RT</b>
Date		Date	<b>7<sup>th</sup> January 2019</b>

**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? - Section 8 Development Management – DM1**

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

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

### DM1 Emerging policy approach for carbon reduction

NPPF 2018 states at paragraph 150 b) that '*new development should be planned to help reduce greenhouse gas emissions by its location, orientation and design.*' (paraphrased). However, it also states that any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards. Such technical standards are currently provided for through Building Regulations, the emerging policy DM1 should therefore not place policy requirements on those providing new homes over and above Building Regulation requirements at any point in time.

While the NPPF (2018) provides at paragraph 151 c) for the co-locating of new heat customers and suppliers in order to increase the use and supply of renewable and low carbon energy and heat it does not stipulate that a Council should require connection of new homes to such energy supply systems, indeed such an insistence with regard to this requirement would mitigate against consumer choice. Consumers should be free to choose their energy providers and the sources of energy they wish to consume to heat and power their homes.

Moreover, the Council should not seek to introduce carbon off-setting by introducing contributions towards off site measures, in doing so it is acknowledging that it is not possible to achieve zero carbon development. Indeed, the Government abandoned its target to achieve zero carbon homes by 2016 as it failed to identify a solution to move from Part L 2013 to zero carbon.

As the percentage of new homes to be delivered by the plan is only a fraction of the total dwelling stock across the authority such an emerging policy position would have little impact on reducing CO2 emissions or improving energy efficiency.

Such onerous zero carbon targets would also impact on viability and the ability of development to meet other policy requirements such as affordable housing.

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

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

**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		Title	<b>Mrs</b>
First Name		First Name	<b>Louise</b>
Surname		Surname	<b>Follett</b>
Job Title <i>(only if applicable)</i>		Job Title	<b>Principal Planner</b>
Organisation <i>(only if applicable)</i>	<b>Robert Hitchins Ltd</b>	Organisation	<b>Pegasus Group</b>
Email		Email	<a href="mailto:Louise.Follett@pegasusgroup.co.uk">Louise.Follett@pegasusgroup.co.uk</a>
Address		Address	<b>Pegasus House</b>
			<b>Querns Business Centre</b>
			<b>Cirencester</b>
Postcode		Postcode	<b>GL7 1RT</b>
Date		Date	<b>7<sup>th</sup> January 2019</b>

**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? Section 8 Development Management – DM5**

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

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

### DM5 Emerging Policy approach for facilitating the delivery of self-build plots

Our client expresses concern with an emerging policy position requiring a proportion of the homes to be delivered at the Whitchurch SDL or as part of larger 'standard' housing schemes as self-build/custom plots. The following reservations are expressed with regard to this policy approach which is not substantiated by local evidence in the consultation document;

- There is no certainty over the delivery of self-build plots therefore certainty over the delivery of a specific number of homes at any allocated site arises affecting housing land supply and the Council's proposed housing delivery trajectory
- Should self-build homes not deliver they are effectively removed from the housing land supply whereas a house builder would deliver a site in its entirety providing greater certainty to the local planning authority concerning delivery and their five housing land supply position
- Self-build plots are exempt from CIL so the Council would potentially lose a revenue stream
- Any self-build policy should be based on evidence considered by the SHMA – NPPG (ID 2a-021)

The consultation does not provide evidence of need for self-build/custom plots to be provided on SDL's or larger standard housing schemes. The authority should demonstrate this policy approach with evidence from the self-build register of the public requesting such plots. Ordinarily individual self-build/custom plots are sought in rural locations, not as part of a larger site being delivered by the existing housing industry.

*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 online: [www.bathnes.gov.uk/localplan](http://www.bathnes.gov.uk/localplan)**

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

**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		Title	<b>Mrs</b>
First Name		First Name	<b>Louise</b>
Surname		Surname	<b>Follett</b>
Job Title <i>(only if applicable)</i>		Job Title	<b>Principal Planner</b>
Organisation <i>(only if applicable)</i>	<b>Robert Hitchins Ltd</b>	Organisation	<b>Pegasus Group</b>
Email		Email	<a href="mailto:Louise.Follett@pegasusgroup.co.uk">Louise.Follett@pegasusgroup.co.uk</a>
Address		Address	<b>Pegasus House</b>
			<b>Querns Business Centre</b>
			<b>Cirencester</b>
Postcode		Postcode	<b>GL7 1RT</b>
Date		Date	<b>7<sup>th</sup> January 2019</b>

**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? Section 8 Development Management – DM7**

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

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

DM7 Proposed policy approach for housing accessibility policies

The need for housing for different groups should be thoroughly assessed and evidenced as required by the NPPF at paras 31, 61 and 62 in order to justify any particular policy position taken with regard to the provision of housing including size, type and tenure.

The Council will need to comply with para 127f) and footnote 42 of the NPPF (2018) and the criteria of NPPG (ID 56-005 to 56-011) if they wish to adopt any higher accessible and adaptable standards. All new homes are already built to the standards of Part M of the Building Regs with regard to accessibility requirements, should the Council wish to justify the inclusion of optional higher standards a full local assessment evidencing the specific case for B&NES will be required to be produced and examined as part of the Local Plan evidence base.

*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 online: [www.bathnes.gov.uk/localplan](http://www.bathnes.gov.uk/localplan)**

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

**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		Title	<b>Mrs</b>
First Name		First Name	<b>Louise</b>
Surname		Surname	<b>Follett</b>
Job Title <i>(only if applicable)</i>		Job Title	<b>Principal Planner</b>
Organisation <i>(only if applicable)</i>	<b>Robert Hitchins Ltd</b>	Organisation	<b>Pegasus Group</b>
Email		Email	<a href="mailto:Louise.Follett@pegasusgroup.co.uk">Louise.Follett@pegasusgroup.co.uk</a>
Address		Address	<b>Pegasus House</b>
			<b>Querns Business Centre</b>
			<b>Cirencester</b>
Postcode		Postcode	<b>GL7 1RT</b>
Date		Date	<b>7<sup>th</sup> January 2019</b>

**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? Section 8 Development Management – DM8**

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

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

### DM8 Proposed policy approach for space standards

The need for housing for different groups should be thoroughly assessed and evidenced as required by the NPPF at paras 31, 61 and 62 in order to justify any particular policy position taken with regard to the provision of housing including size, type and tenure.

The consultation document states at paragraph 8.9.1 that the NPPF allows for the introduction of the National Space Standards through Local Plans '*where the need for an internal space standard can be justified*'. Should the Council wish to pursue this approach through the B&NES Local Plan then it should only be done so in accordance with para 127f) and footnote 42 of the NPPF (2018) and the criteria of NPPG (ID 56-005 to 56-011).

Specifically, the following requirements of the NPPG are highlighted that "*Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local Planning Authorities should take account of the following areas need, viability and timing*" (ID: 56-020). Our client is particularly concerned that the authority carefully consider impacts on need, viability and timing before introducing the NDSS.

*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**

**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		Title	<b>Mrs</b>
First Name		First Name	<b>Louise</b>
Surname		Surname	<b>Follett</b>
Job Title <i>(only if applicable)</i>		Job Title	<b>Principal Planner</b>
Organisation <i>(only if applicable)</i>	<b>Robert Hitchins Ltd</b>	Organisation	<b>Pegasus Group</b>
Email		Email	<a href="mailto:Louise.Follett@pegasusgroup.co.uk">Louise.Follett@pegasusgroup.co.uk</a>
Address		Address	<b>Pegasus House</b>
			<b>Querns Business Centre</b>
			<b>Cirencester</b>
Postcode		Postcode	<b>GL7 1RT</b>
Date		Date	<b>7<sup>th</sup> January 2019</b>

**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? Section 8 Development Management – DM14**

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

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

DM14 Policy Options for Residential Parking Standards

Our client draws attention to the need for the Council to review its existing parking policies, in particular attention is drawn to the setting 'maximum' parking standards which would be contrary to national policy.

*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**

**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		Title	<b>Mrs</b>
First Name		First Name	<b>Louise</b>
Surname		Surname	<b>Follett</b>
Job Title <i>(only if applicable)</i>		Job Title	<b>Principal Planner</b>
Organisation <i>(only if applicable)</i>	<b>Robert Hitchins Ltd</b>	Organisation	<b>Pegasus Group</b>
Email		Email	<a href="mailto:Louise.Follett@pegasusgroup.co.uk">Louise.Follett@pegasusgroup.co.uk</a>
Address		Address	<b>Pegasus House</b>
			<b>Querns Business Centre</b>
			<b>Cirencester</b>
Postcode		Postcode	<b>GL7 1RT</b>
Date		Date	<b>7<sup>th</sup> January 2019</b>

**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? Section 8 Development Management – DM15**

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

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

DM15 Options for Defining Parking Standards

Our client raises concern over an emerging policy approach that confers development plan status onto a Supplementary Planning Document (SPD). An SPD is not compliant with Local Plan Regulations, it is not subject to the same rigour of preparation, consultation or external examination as a Local Plan.

Our client's preferred approach is for parking standards to be defined through the Local Plan.

*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 online: [www.bathnes.gov.uk/localplan](http://www.bathnes.gov.uk/localplan)**

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

**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		Title	<b>Mrs</b>
First Name		First Name	<b>Louise</b>
Surname		Surname	<b>Follett</b>
Job Title <i>(only if applicable)</i>		Job Title	<b>Principal Planner</b>
Organisation <i>(only if applicable)</i>	<b>Robert Hitchins Ltd</b>	Organisation	<b>Pegasus Group</b>
Email		Email	<a href="mailto:Louise.Follett@pegasusgroup.co.uk">Louise.Follett@pegasusgroup.co.uk</a>
Address		Address	<b>Pegasus House</b>
			<b>Querns Business Centre</b>
			<b>Cirencester</b>
Postcode		Postcode	<b>GL7 1RT</b>
Date		Date	<b>7<sup>th</sup> January 2019</b>

**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? Section 8 Development Management – DM16**

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

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

### DM16 Emerging policy approach for electric vehicles infrastructure

Our client considers that it is premature for the emerging policy position of the Council to introduce a requirement for electric vehicle charging points in residential developments for all individual dwellings with one or more dedicated parking spaces or garage.

The Council should engage with main energy infrastructure providers in order to ascertain and evidence the ability of the network to accommodate vehicle re-charging at the proposed SDL development locations and at those sites proposed to be allocated to deliver the B&NES non-strategic growth for the plan period up to 2036.

Additional infrastructure may be required to facilitate vehicle charging at new housing sites eg: new cables or sub-stations. The cost of this additional infrastructure may impact on the viability, phasing and delivery of new housing development at a time when the current Government imperative is to boost the delivery of new housing supply.

It is understood that a future Department of Transport consultation on electric vehicles is proposed and the Council is encouraged to await the outcome and results of such a consultation before further developing their emerging policy on this matter.

*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 online: [www.bathnes.gov.uk/localplan](http://www.bathnes.gov.uk/localplan)**

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

**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		Title	<b>Mrs</b>
First Name		First Name	<b>Louise</b>
Surname		Surname	<b>Follett</b>
Job Title <i>(only if applicable)</i>		Job Title	<b>Principal Planner</b>
Organisation <i>(only if applicable)</i>	<b>Robert Hitchins Ltd</b>	Organisation	<b>Pegasus Group</b>
Email		Email	<a href="mailto:Louise.Follett@pegasusgroup.co.uk">Louise.Follett@pegasusgroup.co.uk</a>
Address		Address	<b>Pegasus House</b>
			<b>Querns Business Centre</b>
			<b>Cirencester</b>
Postcode		Postcode	<b>GL7 1RT</b>
Date		Date	<b>7<sup>th</sup> January 2019</b>

**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? Section 8.2 Core Strategy Policies – CP9**

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

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

### Core Strategy (2014) Policies

#### Policy CP9 Affordable Housing

The NPPF requires the Local Plan to clearly set out the Council's approach to the level and type of affordable housing provision required over the plan provision. However, the NPPF is also clear that policies for such provision needs to be considered against the need to deliver infrastructure and that they should not undermine the deliverability of the whole Local Plan.

Whole plan viability is critically dependent on the inputs into viability assessment, which itself is highly sensitive to changes or assumptions made. NPPF now requires at paragraph 57 for the cumulative burden of policy requirements to be set such that most sites are deliverable without further viability assessment negotiations.

The West of England JSP Policy 3 – Affordable housing, which requires 35% affordable housing on sites of 5 dwellings or more, is subject to numerous outstanding objections and will be further considered through the JSP EIP.

The Council are reminded that if the Local Plan is to be found sound, and compliant with national planning policy then it will need to ensure that development is not subject to such excessive policy obligations and burdens that it's viability is threatened, and the Local Plan becomes undeliverable.

*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**

**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		Title	<b>Mrs</b>
First Name		First Name	<b>Louise</b>
Surname		Surname	<b>Follett</b>
Job Title <i>(only if applicable)</i>		Job Title	<b>Principal Planner</b>
Organisation <i>(only if applicable)</i>	<b>Robert Hitchins Ltd</b>	Organisation	<b>Pegasus Group</b>
Email		Email	<a href="mailto:Louise.Follett@pegasusgroup.co.uk">Louise.Follett@pegasusgroup.co.uk</a>
Address		Address	<b>Pegasus House</b>
			<b>Querns Business Centre</b>
			<b>Cirencester</b>
Postcode		Postcode	<b>GL7 1RT</b>
Date		Date	<b>7<sup>th</sup> January 2019</b>

**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? Section 8.21 Placemaking Plan Policies – SCR5**

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

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

Placemaking Plan (2017) Policy Review

Policy SCR5 Water Efficiency Proposed approach

Current Building Regulations require all new dwellings to meet a mandatory level of water efficiency of 120 litres per day per person. Should the Council pursue the introduction of a higher water efficiency target then it should do so by applying the criteria set out in the NPPG (ID 56-013 to 56-017).

Furthermore, and critically, the Housing Standards Review stated explicitly that reduced water consumption was solely applicable to water stressed areas.

*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 online: [www.bathnes.gov.uk/localplan](http://www.bathnes.gov.uk/localplan)**

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

**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		Title	<b>Mrs</b>
First Name		First Name	<b>Louise</b>
Surname		Surname	<b>Follett</b>
Job Title <i>(only if applicable)</i>		Job Title	<b>Principal Planner</b>
Organisation <i>(only if applicable)</i>	<b>Robert Hitchins Ltd</b>	Organisation	<b>Pegasus Group</b>
Email		Email	<a href="mailto:Louise.Follett@pegasusgroup.co.uk">Louise.Follett@pegasusgroup.co.uk</a>
Address		Address	<b>Pegasus House</b>
			<b>Querns Business Centre</b>
			<b>Cirencester</b>
Postcode		Postcode	<b>GL7 1RT</b>
Date		Date	<b>7<sup>th</sup> January 2019</b>

**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? Paragraph 7.8 – Spatial Priorities for the Somer Valley**

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

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

Our client is particularly concerned that paragraph 7.8 of the Local Plan Options Consultation (Winter 2018) pp.123-124, makes reference to non-strategic housing growth being provided in the Somer Valley that could, if appropriate include '*options in Mendip District*'.

Concern over this statement is raised as the four JSP authorities are working together under the Duty to Co-operate to provide for their emerging housing needs. The JSP does not provide for the Bath Housing Market Area (for plan making purposes snapped to the boundaries of B&NES) housing requirements to be met outside the B&NES local authority area within Mendip District.

This is all the more important as there is sufficient land that is suitable, available and achievable within B&NES, including our clients site at Land off Stockwood Lane Whitchurch, which would allow for B&NES to meet its own housing requirements without the need to export any potential 'unmet' housing needs to Mendip Council.

Therefore, the B&NES Local Plan should be providing for non-strategic growth to be met with its own administrative boundaries, as well as providing housing growth through the SDL's of Keynsham and Whitchurch.

This point has also been made to the JSP technical consultation on behalf of our client.

*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 online: [www.bathnes.gov.uk/localplan](http://www.bathnes.gov.uk/localplan)**

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

**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		Title	<b>Mrs</b>
First Name		First Name	<b>Louise</b>
Surname		Surname	<b>Follett</b>
Job Title <i>(only if applicable)</i>		Job Title	<b>Principal Planner</b>
Organisation <i>(only if applicable)</i>	<b>Robert Hitchins Ltd</b>	Organisation	<b>Pegasus Group</b>
Email		Email	<a href="mailto:Louise.Follett@pegasusgroup.co.uk">Louise.Follett@pegasusgroup.co.uk</a>
Address		Address	<b>Pegasus House</b>
			<b>Querns Business Centre</b>
			<b>Cirencester</b>
Postcode		Postcode	<b>GL7 1RT</b>
Date		Date	<b>7<sup>th</sup> January 2019</b>

*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.**

√
---

**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? Evidence Base - Draft Interim Sustainability Appraisal**

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

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

Our client raises concern with regard to the Draft Interim Sustainability Appraisal (SA) report and its consideration of 'Option 3 – Approach including some Green Belt locations' with regard to the appraisal of the spatial strategy for non-strategic growth.

Appendix 1a of the Draft Interim Sustainability Appraisal Report Options document repeatedly refers to 'development at locations around Bath' (pp.1 onwards) however there are other Green Belt locations within the authority's area, for example adjacent to the edge of Bristol City that are also sustainable locations for growth, such as our client's site at Land off Stockwood Lane Whitchurch.

Our client requests that the consultation SA be reviewed to give greater consideration to a broader range of sustainable Green Belt locations that could come forward under Option 3, under the requirement to consider 'all reasonable alternatives' through SA, as to date no specific sites have been identified for allocation for the delivery of the authority's non-strategic growth, therefore the consideration of Green Belt sites to meet non-strategic growth requirements should not be restricted to 'Development at locations around Bath' as intimated by Appendix 1a of the SA.

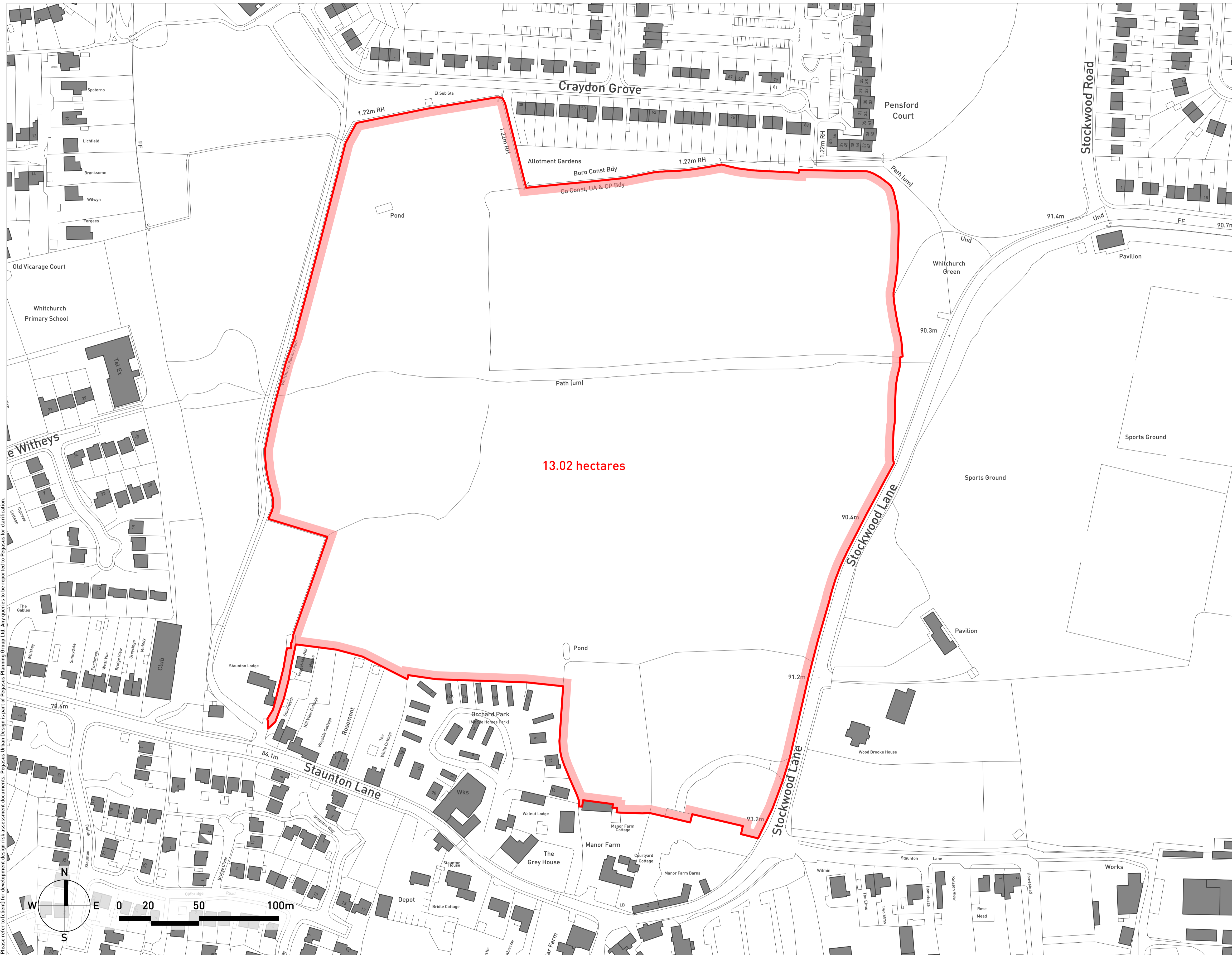
With regard to the findings of Appendix 1a of options for the consideration of the location of development at Whitchurch it is noted that all 3 options have positive effects on 6 SA objectives. Our client disagrees with the findings of this part of the SA and considers that the sensitive release of parcels of Green Belt land between Whitchurch Village and the Bristol urban area need not result in the loss of the distinctive character of Whitchurch as a village.

Our client also considers that expansion of Whitchurch village to the east will have an impact on the Queen Charlton Conservation Area and that this matter should be carefully reviewed moving forward by the local planning authority, when alternative Green Belt sites are available to accommodate growth such as Land off Stockwood Lane, attached at Appendix 1.

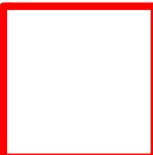
*Please expand this box or attach a separate sheet if you require more space.*

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

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



Key:



Site boundary (13.02ha)

Land off Stockwood Lane, Whitchurch - Site Location Plan



© Pegasus Planning Group Ltd. All rights reserved. Pegasus Group Copyright Licence number 10002090. Pegasus Licence number 10002040. Pegasus Licence number 10002040. Standard OS Licence rights conditions apply. Drawings prepared for planning application purposes and are not to be used for construction or sales documents. Please refer to client for development design risk assessment documents. Pegasus Urban Design is part of Pegasus Planning Group Ltd. Any queries to be reported to Pegasus for clarification.

**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		Title	<b>Mrs</b>
First Name		First Name	<b>Louise</b>
Surname		Surname	<b>Follett</b>
Job Title <i>(only if applicable)</i>		Job Title	<b>Principal Planner</b>
Organisation <i>(only if applicable)</i>	<b>Robert Hitchins Ltd</b>	Organisation	<b>Pegasus Group</b>
Email		Email	<a href="mailto:Louise.Follett@pegasusgroup.co.uk">Louise.Follett@pegasusgroup.co.uk</a>
Address		Address	<b>Pegasus House</b>
			<b>Querns Business Centre</b>
			<b>Cirencester</b>
Postcode		Postcode	<b>GL7 1RT</b>
Date		Date	<b>7<sup>th</sup> January 2019</b>

**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? Paragraphs 1.2.4 – 1.2.5**

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

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

Further to submission of representations to the Regulation 18 Issues and Options Local Plan 2016-2036 Consultation (Winter 2017) Pegasus are pleased to submit representations on the Regulation 18 Options Consultation of the Bath and North East Somerset Local Plan 2016-2036 (Winter 2018) (BNESLP) on behalf of Robert Hitchins Ltd.

The four authorities of the West of England are currently in the process of preparing a Joint Strategic Plan (JSP) that will establish housing numbers across the area for the plan period, the JSP will also identify Strategic Development Locations (SDL's) for the delivery of new homes for schemes providing more than 500 dwellings.

The JSP was submitted to the Planning Inspectorate in April 2018 and further to requests from Inspector's is currently undertaking a Focused Consultation on the Technical Evidence documents that sit behind the proposed changes to the submitted plan.

Clarity is requested from B&NES with regard to the statement at paragraph 1.2.4, '*Given the close links with the Joint Spatial Plan the Draft Plan will not be published for consultation until the four authorities have heard from the Planning Inspector's that are examining and testing the Joint Spatial Plan.*' (emphasis added).

It is not clear what the statement '*have heard from*' means in practice, whether it refers to the Inspector's Interim report further to initial hearing sessions (planned for late Spring 2019) or whether it refers to the Inspector's Final Report which will be published after the final JSP Hearing sessions have closed. It would be unwise of the Draft Local Plan to proceed to Regulation 19 consultation unless the JSP Inspector's had indicated that they considered the JSP to be sound with regard to assumptions around housing growth for the JSP area and the associated housing requirements for each authority, which may require B&NES to pick up the unmet needs of the Wider Bristol Housing Market Area. This all casts considerable doubt on the timing of the publication of the Regulation 19 Draft Local Plan and the Council's currently envisaged timetable shown at paragraph 1.2.5.

*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 online: [www.bathnes.gov.uk/localplan](http://www.bathnes.gov.uk/localplan)**

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



**From:** Councillor Tim Kent [REDACTED]  
**Sent:** 11 January 2019 08:39  
**To:** Local Plan; Transport Planning; comment@jointplanningwofe.org.uk;  
comments@jointplanningwofe.org.uk  
**Subject:** Fwd: Whitchurch Lane Ring Road.  
**Categories:** Green Category

Please find below a consultation response from one of my local residents. I had thought that I had forwarded all responses that I had received onto you but I just discovered this one in my inbox.

All the best

Cllr Tim Kent

*Cllr Tim Kent*  
*Liberal Democrat Councillor for Hengrove and Whitchurch Park Ward*  
*Email: [cllr.tim.kent@bristol.gov.uk](mailto:cllr.tim.kent@bristol.gov.uk) or [timkent74@gmail.com](mailto:timkent74@gmail.com)*  
*Tel: 01173005645*

*Please click [here](#) for a copy of my privacy notice that sets out how the data you have sent me will be processed and stored.*

Begin forwarded message:

**From:** Diane Robertson [REDACTED]  
**Date:** 22 December 2018 at 14:37:55 GMT  
**To:** [REDACTED]  
**Subject:** Whitchurch Lane Ring Road.

We would like to oppose the changing of the status of Whitchurch Lane to a ring road. Our reasons being ,

- 1/ Extreme difficulty leaving our drive onto the road as no drivers will slow down enough to enable us to drive out into the stream of traffic when trying to turn right against oncoming cars causing us to have to turn left and have to go to the nearest safe place where we are able to turn around and join the same direction of traffic.
- 2/ Constant noise throughout the day and also night , caused by large lorries and skip wagons going over the concrete cushions.
- 3/ Extra traffic is bound to produce more exhaust fumes which is detrimental to health.
- 4/ We will be having the Metro bus 1 running from the 6th of January 2019 which in itself will give us a bus every ten minutes although ran on bio fuel will still add to congestion and noise.
- 5/ We have extreme difficulty crossing the road as pedestrians as there again no one will let you go to the other side and even if we get to the zebra crossing we then have to negotiate the traffic coming up Bamfield Road to get to the bus stop.
- 6/ How are the children going to safely cross when coming from Banfield Road to school at School Close Rookery Way?

The notice in the newsagents gave the address for this email but I would not have known if I had not been shopping today, so feel that more people would have been informed if maybe fliers had been put through letterboxes.

Regards,

Diane and David Robertson.



---

Council services: <http://www.bristol.gov.uk/service>

Latest council news: <http://www.bristol.gov.uk/ournews>

Consultations: <http://www.bristol.gov.uk/consult>

[REDACTED]

---

**From:** guy rounce [REDACTED]  
**Sent:** 04 January 2019 16:12  
**To:** Local Plan  
**Subject:** Local Plan policy submissions

**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.

Guy Rounce

[REDACTED]

**From:** G Rowland [REDACTED]  
**Sent:** 02 January 2019 17:29  
**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.

Dr Gary Rowland  
[REDACTED]

**From:** G Rowland [REDACTED]  
**Sent:** 02 January 2019 17:30  
**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.

Mrs J Rowland  
[REDACTED]

[REDACTED]

---

**From:** john rowles [REDACTED]  
**Sent:** 05 January 2019 13:31  
**To:** Transport Planning; Local Plan; [REDACTED]  
[REDACTED]  
**Subject:** South Bristol Wrong Road - Objections  
**Categories:** Green Category

Dear all,

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 the situation.

Kind regards

John Rowles

[REDACTED]

---

**From:** Comment [REDACTED]  
**Sent:** 02 January 2019 15:27  
**To:** Local Plan  
**Subject:** FW: South Bristol Ring Road

**Importance:** High

**Categories:** Green Category

Hi guys,

We have received this email in to the Comment Mailbox. Their Response has now been uploaded in to the JSP Consultation. As this email is about BANES' Local Plan, I'm sending you a copy as well so that it can be actioned as appropriate.

Many thanks,  
Natalie

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

**From:** ian rowles [REDACTED]  
**Sent:** 01 January 2019 17:14  
**To:** [REDACTED]  
**Subject:** South Bristol Ring Road

Ian Rowles  
[REDACTED]

1st January 2019

Planning Services  
Bath & North East Somerset Council Lewis House Manvers Street Bath Somerset  
BA1 1JG  
Ref: Bath & North East Somerset Council Local Plan 2016-2036

Following on from your recent 'consultation' meeting at Whitchurch Community Centre on the 19th November, I am writing to register my concerns and strong disapproval of the planned developments south of Whitchurch, the South Orbital Highway Link and the proposed Park and Ride on the A37 as outlined in your Local Plan 2016-2036.

I believe that this proposal will have a serious and long-lasting negative effect on the Green Belt south of Bristol and will lead to Urban Sprawl. This is clearly indicated in your own document entitled "Local Plan: Part 1 Green Belt Assessment: Whitchurch Strategic Development Location".

The Local Plan will have a devastating impact on cells 52D, E, F & G as shown in the Green Belt Assessment. Each of which makes a major contribution to checking the sprawl of Bristol. Furthermore, the housing development will mean the Village of Whitchurch will become sandwiched between the City of Bristol and the New Garden Community and will, over time, lose all identity. It's clear to all that 2,500 homes will bring with it well over 9,000 new residents and a large increase in the number of cars and commercial vehicles, all adding to already high air pollution figures and an unwelcome increase in traffic.

Local services are already at a stretch in the area and recent developments on the old Horse World site and the construction of White Church Court near Queen Charlton have added to this. Further

development, without adding additional facilities such as Doctors, Dentists and local shops will push the existing amenities to breaking point and have a major impact on those already living in the area. In addition to the above, the land under consideration is home to a diverse range of wildlife whose habitats are forever under threat and whose disappearance could have a long term and devastating impact on the local ecology and eco systems.

In relation to the proposed South Orbital Highway Link, I can only conclude that the planners are not familiar with the local area and have no understanding of the issues already faced by local residents and road users.

Adding even more traffic to any already busy Whitchurch Lane, makes absolutely no sense and only goes to prove how out of touch the planners truly are. In fact, the councils own "South East Bristol and Whitchurch Transport Package Options Assessment Report" states that travel times heading west along Whitchurch Lane will increase.

I am also extremely concerned about the increase in noise and air pollution along the suggested route and fear for the health and safety of the 630 pupils of Bridge Farm Primary School whose life will undoubtedly be disrupted by this road development.

At present, the adjacent roads have a 20mph restriction in place and traffic calming measures to ensure the safety of the children, staff and parents. The roads are also used before and after school for dropping off and picking up pupils as well as on weekends for those using the school's facilities for sports and recreational activities.

In fact, a recent survey carried out by "20mph Bristol" in conjunction with Bristol City Council has shown that the vast majority of those asked think all schools should be protected by 20mph speed limits. Increasing the speed limit to even 30pmh as suggested, introducing more and varied traffic and restricting the amount of on-street parking in this area will have a major impact on road safety and the lives of the school's pupils.

The school has two busy road crossing points on Whitchurch Lane as well as an entrance on Half Acre Lane. Traffic in the area is already at a stand still at the start and end of the school day as these crossings are in constant use.

Funnelling more traffic along this route, especially in the rush hour periods, will only add to the situation and turn adjacent roads into "Rat Runs" as frustrated car, van and lorry drivers try to find alternate routes around the hold ups.

There are nine side roads that intersect with Whitchurch Lane along the residential section between Washing Pound Lane and The Community College. Getting in and out of many of these intersections (for example Fortfield Road, East Dundry Road and Bamfield) can be extremely difficult at busy times, causing long traffic queues to build up.

The proposed increase in traffic volumes will only add to this and it's therefore inevitable that restrictions will be put in place to stop right turns across the flow of traffic. This in itself will only add to an increase in the amount of traffic entering the residential side streets and put the health and safety of local residents at risk.

Finally, I must say that encouraging large Heavy Good Vehicles, which weigh in excess of 40 tons, to use this route is an insanity and the existing roads, which have limited room for expansion, just won't be able to cope. The impact on local residents will be insufferable and the additional noise and air pollution will degrade the quality of life as well as the physical and mental wellbeing of a great many in this community.

Turning to the proposed new Park and Ride on the A37. I am unclear who this is meant to serve and no full explanation could be given to me at the consultation.

The "South East Bristol and Whitchurch Transport Package Options Assessment Report" concludes that it will not improve journey times into the centre of Bristol by any significant amount. However, it will encourage more traffic from the Wells, Radstock, Midsomer Norton and Shepton Mallet areas to use the A37 and add to the issues already experienced by the residents of the smaller villages along the A37 such as Pensford and Temple Cloud where the width of the roads already cause traffic to build up at busy times.

The OAR also states that the Park and Ride would not be profitable for some time and would require subsidy. It also goes on to say that it's unlikely that a bus operator would take on the required number of buses per hour and users would have to rely on the existing 376 from Wells which runs every 30mins plus two other buses per hour if the local bus operator chooses to extend its services.



Given the above, plus the fact that no additional Bus Lanes will be provided along the A37, I must question if this is truly 'Value for Money' and if local tax payers should be asked to foot the bill! In conclusion, I feel that within these proposals there is no indication of how the scheme will actually improve the day to day lives of those already living in the area. It does however go to show how the proposals will have a major negative impact on the green belt, the existing local residents, wildlife (and habitat), ecology, eco system, local services, traffic volumes and pollution.

As an aside, I would like to state that the way B&NES Council have gone about this consultation is a disgrace. I can't understand why given that they, along with Bristol City Council, have access to the names and addresses of all residents in the area, have not undertaken a direct mail campaign to make people aware of the proposals.

The lack of information and the way it's been disseminated is underhand and suggests that B&NES Council want to keep this process as quiet as possible. The only way most residents have found out about the proposal and consultation meetings is through Social Media, something that many elderly residents do not have access to. The cynical might go so far as to say that the fact that it's being carried out over the Festive period suggests that B&NES hope that people's focus is elsewhere and will therefore get fewer disagreements.

I sincerely hope that the views of Local Residents along with our MPs, Local Government & Parish Councillors and recently formed Pressure Groups who have already expressed their objections to this proposal are truly listened to and acted upon.

Kindest Regards

Ian Rowles

---

South Gloucestershire Council Achieving excellence for our residents and their communities, ensuring South Gloucestershire continues to be a great place to live and work

---

This email and any files transmitted with it from South Gloucestershire Council are confidential and intended solely for the use of the individual or entity to whom they are addressed. You should not forward it by any method to anyone else who does not have a justified need to know'

If you have received this email in error please notify the sender or click the unsubscribe link

For requests for service or complaints, please visit [www.southglos.gov.uk](http://www.southglos.gov.uk)

Should you wish to know more about how we look after your personal information, please visit [www.southglos.gov.uk/privacy](http://www.southglos.gov.uk/privacy)

---

#####  
#####

Scanned by MailMarshal - M86 Security's comprehensive email content security solution.

Download a free evaluation of MailMarshal at [www.m86security.com](http://www.m86security.com)

#####  
#####

[REDACTED]

---

**From:** Tim Kent [REDACTED]  
**Sent:** 06 January 2019 22:30  
**To:** comment@jointplanningwofe.org.uk; Local Plan; Transport Planning  
**Subject:** Fwd: Whitchurch village development

**Categories:** Green Category

Please find below a submission to the consultations from a resident.

All the best

Cllr Tim Kent  
Bristol City Council

----- Forwarded message -----

**From:** **Hugh Rowley** [REDACTED]  
**Date:** Sun, 6 Jan 2019 at 15:56  
**Subject:** Whitchurch village development  
**To:** [REDACTED]

I believe that the above development proposals are unsustainable and that there are more sustainable locations that should be considered.  
The effects on Whitchurch Lane are completely unacceptable to residents of the area and would result in untold environmental damage to the welfare of these residents.  
The roads and proposed junctions are not wide enough to build this scheme.  
The effects on the children at the local schools would be devastating.  
Yours faithfully  
Mr. Hugh Rowley

Sent from my iPad