

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	B&NES, Chew Valley North Ward
<b>Name</b>	Cllr Liz Richardson
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS3 - Combination of locations outside and within the Green Belt
<b>Comment</b>
<p>Policy option SS3 Combination of locations outside and within the Green Belt ( p21 )          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 ..... 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.</p> <p>If this approach is taken:</p> <ul style="list-style-type: none"> <li>* Parishes with Neighbourhood plans ought to be asked if they would like to consider site allocation via NP mechanisms, some may like to see limited growth to help sustain the vibrancy of their Parishes.</li> <li>* A full consultation on details regarding policy SS3 ought to take place prior to the Draft Plan preparation if this policy becomes the preferred way forward, the current consultation document states “the scale of any development that would be directed to Green Belt locations is not known at this stage” so it would be unfair and disenfranchise these locations to push to a draft policy without further options.</li> <li>* Banes ought to undergo a review of Parish conservation areas in parallel with the assessment to ensure they are updated via the new Local Plan.</li> <li>* Regarding NPPF, paragraph 140: the Parishes currently in Chew Valley North Ward make an important contribution to the open character of the Green Belt.</li> </ul>

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<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 8 - Development Management policiesDM2 - Wind energy development
<b>Comment</b>
<p>Policy option DM2 Emerging policy approach for harnessing wind energy  It is proposed that the policy framework for wind energy development should cover and address the following considerations:  • Proposals for wind energy development must lie within an area identified as being suitable for this type of development.....  Disagree with this first point (agree with all the others).</p> <p>. NPPF 2018 states: "A proposed wind energy development involving one or more wind turbines should not be considered acceptable unless it is in an area identified as suitable for wind energy development in the development plan; ....."</p> <p>In identifying suitable areas the first and primary assessment ought to be overall landscape suitability. The Options document para 8.4.4 states: "The preparation of the Local Plan presents an opportunity to reconsider the Council's approach to wind energy development in light of the NPPF." Surely, this does not mean it can re-assess previously accepted reports. The Landscape Sensitivity Analysis for Wind Energy Development in Bath and North East Somerset (2010) (part of the supporting documents) undertaken to assess the landscape sensitivity to wind development for small, medium and large wind turbines indicated that there was only a limited scope for medium and large turbines in the area. Table 4.1 in that report gives a "Summary of Results from the Sensitivity Analysis". It would appear that the detail in these results has been "diluted" by superimposing onto it results from technical analysis. This is surely not good practise.. If a landscape is highly or moderately highly sensitive to large and medium sized turbines it ought to be unsuitable for taking through to being assessed regarding technical delivery. Thus with this in mind I strongly disagree with Diagram 46.</p> <p>Diagram 46 does not seem to take account of the nuanced detail in the landscape (table 4.1 of the supporting report did).</p> <p>Some of the rural areas have a tourist trade (all be it in a different category to that of Bath City), for this the unspoilt landscape is very significant, there are important views in and out of villages and the AONBs.</p> <p>Preferred approach is.... to see the diagram 46 removed along with the first bullet point, and the policy ought to reference the supporting documents.</p>

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<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 8 - Development Management policiesDM5 - Delivery of self-build plots
<b>Comment</b>
<p>DM5 Approaches for facilitating the delivery of self-build plots</p> <ul style="list-style-type: none"><li>• include self-build plots as part of the two Strategic Development Locations at North Keynsham and Whitchurch</li><li>• include self-build plots as part of larger "standard" housing schemes</li><li>• allow self-build-only schemes (large or small)</li></ul> <p>Disagree with the final bullet point and would prefer to see it removed. The other 2 enable self build to merge with detailed development.</p>

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<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 8 - Development Management policies DM10 - Housing in Green Belt Villages
<b>Comment</b>
<p>DM10 Proposed policy approach options for housing in Green Belt villages</p> <p>Options:</p> <ol style="list-style-type: none"> <li>1. Limited infilling in villages to be appropriate within defined "infill boundaries". The current HDBs would be reviewed in order to ensure they have been defined so as to identify the extent of limited infill opportunities in all villages washed over by the Green Belt where such opportunities exist.</li> <li>2. Limited infilling in villages to be allowed and for this to be determined at the time of considering a planning application. HDBs or infill boundaries would not be defined for Green Belt villages.</li> </ol> <p>Support option 1.</p>

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<b>Name</b>	CLlr Liz Richardson
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 8 - Development Management policies DM14 - Residential Parking Standards
<b>Comment</b>
<p>DM14 Policy Options for Residential Parking Standards: District-wide differentiation</p> <ol style="list-style-type: none"> <li>1. Develop and define parking standards differentiated spatially in broad areas or zones across the District reflecting key accessibility characteristics</li> <li>2. Continue with the current standard minimum parking standards in Bath city centre and uniform maximum parking standards elsewhere in B&amp;NES</li> </ol> <p>Support option 1</p> <p>Garages</p> <ol style="list-style-type: none"> <li>1. Continue to include garages in the residential parking standard</li> <li>2. Exclude garages from the residential parking standard and review the number of spaces required for different size dwellings</li> </ol> <p>Support Option 2</p> <p>On-street Parking &amp; Highway Design</p> <p>Proposed to include in the Local Plan policy or a SPD guidance on highway design and on street parking provision.</p> <p>Support</p>

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<b>Name</b>	Cllr Liz Richardson
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 8 - Development Management policiesDM15 - Defining Parking Standards
<b>Comment</b>
DM15 Options for defining Parking Standards: .....Local Plan policy to refer to parking being provided in accordance with the standard defined in a SPD or a standard defined in a made Neighbourhood Plan based on robust evidence and it is consistent with the overall parking strategy. Support this approach

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<b>Name</b>	CLlr Liz Richardson
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 8 - Development Management policies DM14 - Residential Parking Standards
<b>Comment</b>
<p>DM14 Policy Options for Residential Parking Standards:</p> <p>District-wide differentiation</p> <ol style="list-style-type: none"> <li>1. Develop and define parking standards differentiated spatially in broad areas or zones across the District reflecting key accessibility characteristics</li> <li>2. Continue with the current standard minimum parking standards in Bath city centre and uniform maximum parking standards elsewhere in B&amp;NES</li> </ol> <p>Support option 1</p> <p>Garages</p> <ol style="list-style-type: none"> <li>1. Continue to include garages in the residential parking standard</li> <li>2. Exclude garages from the residential parking standard and review the number of spaces required for different size dwellings</li> </ol> <p>Support Option 2</p> <p>On-street Parking &amp; Highway Design</p> <p>Proposed to include in the Local Plan policy or a SPD guidance on highway design and on street parking provision.</p> <p>Support</p>

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<b>Company</b>	B&NES, Oldfield Ward
<b>Name</b>	Cllr Shaun Stephenson-McGall Councillor
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
I support option one as outlined.



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<b>Name</b>	Cllr Shaun Stephenson-McGall Councillor
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
Affordable student housing is importing and this proposed requirement should also apply to accommodation built by the higher education providers.

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<b>Name</b>	Cllr Shaun Stephenson-McGall Councillor
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
No new academic building should be allowed on the Claverton Down campus until the university provides more accommodation for their students.

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**Respondent**

<b>Company</b>	B&NES, Oldfield Ward
<b>Name</b>	Cllr Will Sandry Councillor
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
Support this approach, however Permitted Development rights should be removed from existing HMOs. The intensification of use of individual properties in HMO use add extra pressure to communities with high numbers of HMOs.

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<b>Company</b>	B&NES, Oldfield Ward
<b>Name</b>	Cllr Will Sandry Councillor
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
Support Option 1. The universities must stop taking (by proxy) general needs housing in the city. The Universities must balance the growth of their accommodation and teaching space on campus. The local plan should not only consider increases in student numbers but also increases in staff numbers (lecturers and ancillary staff) and where they may be able to find housing.

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**Respondent**

<b>Company</b>	B&NES, Oldfield Ward
<b>Name</b>	Cllr Will Sandry Councillor
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
Support option 2

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Bath Chamber of Commerce and the Initiative in B&NES
<b>Name</b>	Mr Ian Bell Executive Director
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
Any other comments
<b>Comment</b>
<p>Response to the Local Plan Consultation January 7th 2019  From Ian Bell, Executive Director  On behalf of Bath Chamber of Commerce and the Initiative in B&amp;NES</p> <p>Our members have a long term commitment to our district and do what they can to ensure long term sustainable economic growth which will benefit the whole community.</p> <p>Consequently there is broad support for the Vision expressed in the Local Plan, albeit we noted the absence of two key words “ culture and sustainability, which we believe should be incorporated.</p> <p>There is also broad concern that the ambition set out in the vision is at odds with what has been achieved in recent years, with some elements within the Council (Planning) seemingly being mis-aligned with others (Economic Development). We have seen a derisory amount of new office space with the result that too many businesses have been forced to go elsewhere to flourish and grow.</p> <p>We recognise this poses a challenge to the Local Authority as no council can directly control the creation of jobs. We also note the Council owns two of the largest and most valuable development sites for which it will be under pressure to deliver the best value.</p> <p>We would characterise the approach in the plan to be “Build it and they will come.” But we are concerned that history suggests there is a real risk that it won’t be built and they will not come. We very much hope that this turns out to be ill-founded.</p> <p>One other issue we would like to raise is the target for new dwellings by 2036 will very likely mean that far more than 12,500 people will be looking for jobs in Bath and North East Somerset. If they were not to be available locally there will be an in-built additional commuting problem which will further strain our creaking transport infrastructure.</p> <p>Turning to the question of housing numbers, our members believe that there remains geographic scope for more house building on the outskirts of Bath which is not being properly considered for political reasons. Our members are concerned that existing and potential future residents will pay the price of short term electoral gain for Councillors who know there is opposition to virtually any development proposal.</p>

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This approach would involve development within the Green Belt which need not be considered sacrosanct. For example, Government has said it will give powers to local authorities for the development of new garden communities, something which should be taken seriously.

Obviously the creation of such new places will require a visionary approach to transport and infrastructure. It would be disappointing if we merely create housing estates no better than minor suburbs without a mix of uses which will create memorable locations and places in which real community cohesion can be developed.

Development in the Green Belt is allowed for in "exceptional circumstances", but these are unhelpfully not defined by National Policy. However, it has been established by precedents elsewhere that unmet need can be a principal component in establishing exceptional circumstances. Therefore, it surely must be possible to create an additional strategic development site close to Bath help with demonstrable unmet need, particularly for affordable homes. The costs of such building are much less than they would be in more rural locations such as the Somer Valley because the homes would not need the same level of investment in new infrastructure.

Finally, members are concerned about how little progress has so far been made with the Enterprise Zone in the Somer Valley and they fear that there will not be the essential funding in infrastructure investment. Indeed the Joint Transport Plan for the West of England is entirely silent on that point. Without such improvements very few developers or employers would run the risk of any substantial investment there.

**Attachments Included:**

[http://www.bathnes.gov.uk/sites/default/files/webform/local\\_plan\\_response\\_jan\\_2019.pdf](http://www.bathnes.gov.uk/sites/default/files/webform/local_plan_response_jan_2019.pdf)

[http://www.bathnes.gov.uk/sites/default/files/webform/local\\_plan\\_response\\_jan\\_2019\\_0.pdf](http://www.bathnes.gov.uk/sites/default/files/webform/local_plan_response_jan_2019_0.pdf)

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**Respondent**

<b>Company</b>	Bear Flat Association
<b>Name</b>	mr tim cantell Planning Convenor
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS5 - Other comments on Chapter 3
<b>Comment</b>
<p>Diagram 1 on Page 10 of this document sets out a table entitled Housing Supply within which the main components are “Existing commitments” 9,840 dwellings” then “Strategic development” 3,000 dwellings” and “Non-strategic growth” 700 dwellings” . Having regard also for the adopted Core Strategy and Placemaking Plan, it is clear that future new development will be focused on Bath Riverside, Midsomer Norton/Radstock, Keynsham and Whitchurch.</p> <p>Bath &amp; North East Somerset is currently seeking to establish a city centre clean air zone, recognising that Bath has serious problems with air pollution from growth in transport movements and traffic congestion. A spatial strategy which promotes housing development outside the main built up area of Bath, in the smaller towns of Midsomer Norton/Radstock, Keynsham and the rural settlements beyond the Green Belt, is likely to promote more travel to and from Bath for commuting and access to major community facilities such as town centre shopping, leisure or medical services.</p> <p>Residents of Bear Flat are aware of the growth in traffic movements, notably along Wellsway, which are likely to be enhanced if the focus on housing growth outside the City to the south and south-west is maintained without due attention to the impact of new development on existing residential areas. In view of these concerns, the Bear Flat Association (BFA) supports:</p> <ul style="list-style-type: none"> <li>“ Greater emphasis in future on residential development within or adjoining the built-up area of Bath rather than in outlying parts of the District, where new development encourages greater use of the private car and is arguably unsustainable;</li> <li>“ More attention given to making large new developments as self-sustaining as possible, with employment and residential uses coming forward together, and residential scheme having a proportion of units designed to allow for live/work; and</li> <li>“ More rigorous transport policies to extend the provision of Park and Ride facilities at Odd Down, and to promote the use of more sustainable transport modes within Bath.</li> </ul> <p>Residential development</p> <p>Paragraph 3.8.6 of the draft Local Plan states that specific sites will be identified and allocated in the Local Plan or through neighbourhood plans. Three options for allocations are given in Policies SS1, SS2 and SS3. None of these envisage any new development within the City of Bath, as they refer once again to Midsomer Norton, Westfield, Radstock and Timsbury, or to rural locations outside and within the Green Belt. Diagram 8 shows parts of the District where neighbourhood plans are in place</p>



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or being prepared, and none cover the central and suburban areas of Bath.

The draft Local Plan discusses ongoing work related to “non-strategic growth” in the Somer Valley and rural villages. Paragraph 3.5.1 refers to the “unintended consequences” to the policy of dispersal of development across a wide range of settlements, citing pressure on primary school capacity as the critical issue. It would be useful to know whether the impact on traffic volumes, leading to congestion and poor air quality, has also been monitored and taken into consideration.

Diagram 1 of the draft Local Plan expects “urban intensification” to provide an additional 300 new dwellings, and small windfall sites to yield 672 dwellings. Proposed Policy BTH2 states that the Local Plan will identify and “allocate opportunities” to provide an additional 300 dwellings in Bath, which might include brownfield sites among other places. The Housing and Economic Land Availability Assessment (HELAA) provides information on potential sites, but it is noticeable that hardly any are located within the suburban areas of Bath. In our opinion, B&NES should take a positive and pro-active approach to identifying additional sites within Bath. Simply asking people to nominate potential sites may not yield enough or the best sites. In identifying sites within Bath, full regard must be had for the historical and environmental constraints relating to World Heritage City status and the AONB designation, but it should also be recognised that good planning, innovative thinking and the application of high-quality design principles can lead to sustainable development. BFA is not a NIMBY organisation. We did not object to the Mulberry Park brownfield site as its use for housing, well served by buses, makes planning sense. Equally, we will support sensible proposals for infilling and intensification in the suburbs of Bath. However, we do not see planning sense in substantially increasing housing to the south of the city. There is no rail service and road connections are inadequate for traffic at current levels such that buses are delayed with little scope for traffic management to alleviate this. At the very least, such housing needs to be matched by employment opportunities close by and the transport implications of schemes should be thoroughly assessed. Better still would be to shift the emphasis of housing further towards truly sustainable locations.

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**Respondent**

<b>Company</b>	Bear Flat Association
<b>Name</b>	mr tim cantell Planning Convenor
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
<p>Transport policy</p> <p>Emerging Policy BTH9 includes support for the expansion of park and ride facilities at Odd Down, which would be beneficial for residents and businesses in Bear Flat, and is supported. More generally, the overall benefit of using public transport, bicycles or walking, and the harmful effects of unbridled car usage, should be set out clearly in the Local Plan. Paragraph 4.21 addresses the broader subject, but the Local Plan should include positive policies and actions, if it is to be effective. The use of Travel Plans wherever possible should be emphasised, and especially when development at universities, colleges, secondary schools or to provide student accommodation is proposed.</p> <p>Schools traffic should be identified as an issue for the plan. BFA's observations of Wellsway and Bloomfield Road in the morning rush hour show a marked difference in traffic levels between school term time and holidays. Other main roads into Bath are similar. Our own traffic surveys highlight the role of Beechen Cliff School as a traffic generator, but the matter should be considered across the City, taking account of private and State schools. School traffic should be singled out as a particular cause of traffic problems and needing a separate solution. This should involve the Council being proactive as planning, transport and education authority. There should be a programme of creating safe routes to schools on foot and by bicycle and investigation into improving public transport and establishing intra-urban school buses. Every school should adopt and actively pursue a Travel Plan.</p> <p>Universities and Houses in Multiple Occupation (HMOs)</p> <p>We support the approach to University Growth &amp; Student Accommodation in section 4.4 so that provision of student accommodation does not have an overwhelming effect on established residential areas and cause harm to residents' amenity, or take up sites which would be more suitable to meet general housing needs. New student accommodation should be provided on campus. We welcome the adoption of stricter controls in respect of HMOs.</p> <p>Retail and City Centre</p> <p>This topic is addressed in section 4.6, but the draft Local Plan does not refer to local centres, such as the Bear Flat centre on Hayes Place and Wellsway. This centre has suffered from the closure of the post office and general store in recent years, following the earlier loss of its greengrocers and butchers. The Co-op, The Bear public house/hotel, pharmacy and other specialist shops and cafes sustain the local centre but a strong policy to safeguard and enhance local centres should be included in the Local Plan. Local centres which give residents access on foot to convenience shopping and other essential services contribute to healthy living and a sustainable environment.</p>

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**Respondent**

<b>Company</b>	Bristol Airport
<b>Name</b>	Mr. Simon Earles Director of Planning & Sustainability
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
Any other comments
<b>Comment</b>
<p>Bristol Airport very much welcomes the opportunity to engage in the development plan process within Bath and North East Somerset (BANES), our very near neighbour. Situated close to the district's western boundary, the airport is the main international gateway for the West of England and the wider South West of England and South Wales regions. The airport handled over 8.2 million passengers in 2017, making it the ninth busiest UK airport and the third largest regional airport in England. Many of these passengers and the almost 4,000 employees on site are residents of BANES.</p> <p>In late 2018 the airport submitted a planning application to North Somerset Council seeking to secure an increase in passenger capacity from the current 10 million per annum (mppa) to 12 mppa, in order to meet the demand currently forecast for the mid 2020s. Longer term growth, in the region of 15-20 mppa by the mid 2040s, is being addressed within an emerging Master Plan; extensive public consultation (including two exhibitions within central Bath) in late 2017 and mid 2018 has assisted in the preparation of the Master Plan, due be published later this year. The airport was grateful for the two supportive responses submitted by BANES, in which the Council also notes the implications of the airport's proximity on its communities and highway network.</p> <p>It is in this cross-boundary context that Bristol Airport has engaged fully with the planning and transportation strategies for the West of England and its four constituent authorities, including BANES. The need for improved transportation infrastructure and public transport has been at the fore of the airport's concerns in responding to the Joint Spatial Plan, the Joint Transport Study and the emerging Local Plans across the sub-region. The airport has invested significantly, over a number years, in transport infrastructure, services and studies, and is keen to contribute to the emerging Joint Local Transport Plan and specific surface access initiatives, including in relation to the areas of significant development proposed by the JSP. As in the Council's responses to the airport's own Master Plan consultation, the airport recognises the inter-relationships between its own ambitions for phased long-term growth, the Council's proposed growth at 'strategic development locations' and the need for both parties to mitigate environmental and traffic impact on communities, both presently and in the future.</p> <p>It is on this basis that the airport has reviewed the Council's Issues and Options document. Clearly, this is an early stage within the Local Plan-making process, and the airport will very much welcome</p>

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the opportunity to engage fully with the Council as it prepares and then consults on the Draft Local Plan. The airport would hope and expect that the Draft Plan will include further positive reference to the airport in terms of its significant impact on BANES, in respect of enhanced connectivity, international profile (not least in relation to the city of Bath as a 'global brand'), and quantifiable economic and employment benefits, whether directly, in-directly or 'induced'.

The Issues and Options document only refers directly to the airport in relation to the proposal to retain Policy ST8 Airport & aerodrome safeguarding areas as it currently stands. This is welcomed by the airport, as is the proposed policy approach to transport set out in Policy WCH7, with its joint emphasis on 'strategic interventions' and 'sustainable transport interventions'. The focus on traffic congestion within Keynsham (on the route of the popular Bath Bus airport service) and on the A4/A370/SBL corridor (in line with the JSP) are also of interest to the airport as it works on its own long-term Surface Access Strategy (in tandem with the Master Plan). Bristol Airport will expect to see further details, and specific positive proposals, emerge through both the emerging Local Plan and the Joint Local Transport Plan.

It is on this basis that the

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**Respondent**

<b>Company</b>	C Squared Property Development Ltd
<b>Name</b>	Mr Chris Ward Founder Director
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
<p>Dear Sirs,</p> <p>We write with reference to The Local Plan consultation 2018/2019 on the effective policy change to offer more protection to industrial and office sites under the B1, B2 and B8 planning uses. It is understood that there has been a huge reduction in industrial and employment sites across the city in recent times. Development enabling policy such as permitted development rights in particular have impacted the supply. Something clearly missing from the Local Plan is the ability for a site to enter a beneficial use with regard to whether or not it provides employment being a key factor, rather than its ability to be defined in a particular use class (industrial, office etc.)</p> <p>We represent a site which is likely to be included as part of greater protection to non-strategic industrial estates across the city. The site is located within a residential area and would be suitable for a Care Home. As a representative of the Care Home industry it is imperative that a balance on policy wording is achieved. Policy should allow for uses which demonstrate that they employ significant amounts of people to be considered as appropriate certain situations. Care homes, although fall in to a residential use class (C2) in terms of planning, would offer substantial employment opportunities. A 75 bed care homes may employ approximately 100 FTEs. The operating times of a care home are of course around the clock and therefore offer substantial employment opportunities. Whereas an industrial estate may operate for 10 hours a day, and even shorter operating hours in residential areas increasing the focus of traffic at peak and or school times. The range of employment type required by a care home is also highly beneficial to the surrounding residential community. Skills are required, and training provided by operators, for a variety of employment ranging from nurses and carers, to kitchen staff and cleaners to administrators, gardeners and maintenance engineers. Care Homes are also able to offer flexibility to its workforce suiting part-time workers and parents of young children. Care homes are also able to offer career opportunities, training and development opportunities for school leavers with many Care home managers having started their careers as carers.</p> <p>By being able to draw its workforce from the local community there is a reduced reliance on vehicles with many staff ideally being able to walk and or cycle to work. It is also notable that what traffic is generated by this workforce will not be restricted to peak and school times.</p> <p>It is important to consider the external and residual benefits, i.e. those coming and visiting residential in care homes investing in local businesses, the social benefits of care in the community, keeping elderly relatives nearby family whilst having the care home in a central area rather than in a rural area is inherently more sustainable. Without the availability of some sites in the urban area delivering these sites, the social, environmental and economic benefits would prove impossible to deliver</p>

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We would suggest that a blanket approach to offering protection to strategic estates should have caveats which allow use classes which promote employment, rather than just “industry” use classes.

We trust that these representations recognise the need for the emerging policy but offer some flexibility to cater for redundant sites which can be re-developed with significant employment benefits for the local community.

**Attachments Included:**

[http://www.bathnes.gov.uk/sites/default/files/webform/bnes\\_reps\\_jan\\_2019\\_final.docx](http://www.bathnes.gov.uk/sites/default/files/webform/bnes_reps_jan_2019_final.docx)

[http://www.bathnes.gov.uk/sites/default/files/webform/bnes\\_reps\\_jan\\_2019\\_final.pdf](http://www.bathnes.gov.uk/sites/default/files/webform/bnes_reps_jan_2019_final.pdf)

[http://www.bathnes.gov.uk/sites/default/files/webform/bnes\\_reps\\_jan\\_2019\\_final\\_0.pdf](http://www.bathnes.gov.uk/sites/default/files/webform/bnes_reps_jan_2019_final_0.pdf)

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	C Squared Property Developments
<b>Name</b>	Mr Chris Ward Director
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
<p>We write with reference to The Local Plan consultation 2018/2019 on the effective policy change to offer more protection to industrial and office sites under the B1, B2 and B8 planning uses. It is understood that there has been a huge reduction in industrial and employment sites across the city in recent times. Development enabling policy such as permitted development rights in particular have impacted the supply. Something clearly missing from the Local Plan is the ability for a site to enter a beneficial use with regard to whether or not it provides employment being a key factor, rather than its ability to be defined in a particular use class (industrial, office etc.)</p> <p>We represent a site which is likely to be included as part of greater protection to non-strategic industrial estates across the city. The site is located within a residential area and would be suitable for a Care Home. As a representative of the Care Home industry it is imperative that a balance on policy wording is achieved. Policy should allow for uses which demonstrate that they employ significant amounts of people to be considered as appropriate certain situations. Care homes, although fall in to a residential use class (C2) in terms of planning, would offer substantial employment opportunities. A 75 bed care homes may employ approximately 100 FTEs. The operating times of a care home are of course around the clock and therefore offer substantial employment opportunities. Whereas an industrial estate may operate for 10 hours a day, and even shorter operating hours in residential areas increasing the focus of traffic at peak and or school times. The range of employment type required by a care home is also highly beneficial to the surrounding residential community. Skills are required, and training provided by operators, for a variety of employment ranging from nurses and carers, to kitchen staff and cleaners to administrators, gardeners and maintenance engineers. Care Homes are also able to offer flexibility to its workforce suiting part-time workers and parents of young children. Care homes are also able to offer career opportunities, training and development opportunities for school leavers with many Care home managers having started their careers as carers.</p> <p>By being able to draw its workforce from the local community there is a reduced reliance on vehicles with many staff ideally being able to walk and or cycle to work. It is also notable that what traffic is generated by this workforce will not be restricted to peak and school times.</p> <p>It is important to consider the external and residual benefits, i.e. those coming and visiting residential in care homes investing in local businesses, the social benefits of care in the community, keeping elderly relatives nearby family whilst having the care home in a central area rather than in a rural area is inherently more sustainable. Without the availability of some sites in the urban area delivering these sites, the social, environmental and economic benefits would prove impossible to deliver</p> <p>We would suggest that a blanket approach to offering protection to strategic estates should have</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

caveats which allow use classes which promote employment, rather than just “industry” use classes.

We trust that these representations recognise the need for the emerging policy but offer some flexibility to cater for redundant sites which can be re-developed with significant employment benefits for the local community.



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Camerton Parish Council
<b>Name</b>	Mrs Kathryn Manchee Parish Clerk
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>	
CHAPTER 3 - Spatial Strategy including the rural areasSS2 - the Green Belt	More dispersed approach avoiding
<b>Comment</b>	
Camerton Parish Council would prefer to see SS2 Option 2 progressed i.e. a more dispersed approach avoiding the Green Belt. However this option will only be effective if the need for longer park and ride opening times, good public transport and a better road infrastructure in the rural areas is provided.	

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Churches Together in Keynsham and Saltford
<b>Name</b>	Mr David Clarke Chairman
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 5 - Keynsham and North Keynsham Strategic Development Location (SDL)KSM3 - North Keynsham SDL Garden City Principles
<b>Comment</b>
How will you ensure that North Keynsham retail is harmonised with the town centre rather than detracting from it?

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Churches Together in Keysham and Saltford
<b>Name</b>	Mr David Clarke Chairman
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 5 - Keynsham and North Keynsham Strategic Development Location (SDL)KSM10 - Community Facilities and Education Provision
<b>Comment</b>
New developments especially the "garden city" need to include multi-purpose buildings for use by community organisations i.e equivalent to a village hall

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	CPRE
<b>Name</b>	DR Robert Davies
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
Any other comments
<b>Comment</b>
<p>B&amp;NES Local Plan Consultation 2018 HELAA</p> <p>Though nominally the HELAA document is part of the Local Plan Consultation process, there are in fact no policies or options contained within it against which comment or choices may be recorded. Neither is the HELAA at a stage in its development where a informed critique can be offered in that no sites have yet received the status of “suitable” for development, though many have apparently been ruled out.</p> <p>However, it is an important document because the sites which have been put forward or which may be put forward as part of this process are the ones which will likely end up as part of a placemaking scheme. CPRE would therefore welcome consideration of the following observations:</p> <ol style="list-style-type: none"> <li>1. The CPRE is very concerned that there seems to be a total disconnect between the Council’s declared vision and the methodology of the HELAA. The Local Plan Draft emphasises steering non-strategic growth to the “right places” which are “accessible to local services, encourage the use of public transport, walking and cycling” and which “support growth, innovation and the efficient provision of infrastructure”. The CPRE has scrutinised the assessments made of the many sites put forward, and can find no evidence that these sustainability issues have been given the least consideration.</li> <li>2. The main criteria in assessing sites in the HELAA are related to Green Belt, landscape, effects on heritage assets, ecology and green spaces. These are key elements within CPRE’s agenda and we applaud the concerns raised and the fact that so many sites have been deemed “unsuitable” on these grounds. On the other hand, while CPRE is often perceived as being anti-development, we recognize the reality of the housing crisis and the need to build. But, like the Council, we believe houses should be in the “right places” to help create and nurture sustainable communities.</li> <li>3. The HELAA is very much a work in progress, and needs considerable refinement before more specific comments can be made. However, it is inherent in this exercise that it is site-specific. It therefore focuses attention on individual sites, encouraging landowners and developers to lobby and cherry-pick, and communities to object and resist. What is needed is a genuinely holistic approach to sites. This would enable evaluation of how they might work together, at a sustainable scale, to help build improved communities that local people see the benefits of rather than the drawbacks.</li> <li>4. CPRE suggests that the HELAA does not conform to the spirit of the National Guidance which recommends a more structured and organized process, involving, for example, the recording of a</li> </ol>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

site's characteristics , the types of suitable development , availability and deliverability.

5. CPRE would like to see more rigour, consistency and robustness in the judgments expressed in the HELAA, which are sometimes difficult to justify. For example, site K32A is given a "suitability not proven" (as close to an affirmative as the HELAA gets) even though the landscape assessment says that "the site forms an important landscape element of the River Chew Valley corridor and its development would not be appropriate" (!)

6. The Strategic Development Locations of Whitchurch and Keynsham are excluded from consideration because they are already dealt with under the West of England Joint Spatial Plan. The CPRE view is that the JSP is still the subject of Public Consultation and examination and that it would be unsound to rely on these Draft policies.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	CPRE Avonside
<b>Name</b>	Sophie Spencer Director
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS1 - Focussed approach avoiding the Green Belt
<b>Comment</b>
CPRE in principle favours a focused approach avoiding the Green Belt entirely, and recognises the advantages this would bring in terms of enabling better social infrastructure. However, we believe it is important to link housing with sustainable transport infrastructure in Midsomer Norton, Radstock and Westbury if increased congestion on all access routes to and from these “focussed” locations is to be avoided. We must stress that without a radical improvement in alternatives to the private car, local authorities’ obligations on quality and congestion will be impossible to achieve whatever the eventual level of new housing identified.

**Attachments Included:**

[http://www.bathnes.gov.uk/sites/default/files/webform/cpre\\_avonside\\_response\\_to\\_banes\\_local\\_plan\\_consultation\\_2019.pdf](http://www.bathnes.gov.uk/sites/default/files/webform/cpre_avonside_response_to_banes_local_plan_consultation_2019.pdf)

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	CPRE Avonside
<b>Name</b>	Sophie Spencer Director
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH11 - Relocation of Brislington Park & Ride
<b>Comment</b>
<p>CPRE AVONSIDE COMMENTS ON B&amp;NES ‘OPTIONS’ CONSULTATION          JANUARY 2019</p> <p>Chapter 3 Spatial Strategy</p> <p>SS1 Focused approach avoiding Green Belt</p> <p>CPRE in principle favours a focused approach avoiding the Green Belt entirely, and recognises the advantages this would bring in terms of enabling better social infrastructure. However, we believe it is important to link housing with sustainable transport infrastructure in Midsomer Norton, Radstock and Westbury if increased congestion on all access routes to and from these ‘focussed’ locations is to be avoided. We must stress that without a radical improvement in alternatives to the private car, local authorities’ obligations on quality and congestion will be impossible to achieve whatever the eventual level of new housing identified.</p> <p>SS2 More dispersed approach avoiding the Green Belt</p> <p>CPRE takes the view that this is probably the ‘least bad’ of the three options as it could have the advantage of bringing some benefits to a number of villages where more housing is needed, subject to there being capacity in local primary schools and surgeries. However, the acceptability of even this option is dependent on a reduction in the overall level of housing requirement so it reflects latest economic forecasts. This, along with the need for Bristol to take a larger share of the burden, would avoid decanting commuters out into the rural areas with subsequent unacceptable consequences for congestion, sustainability and social inclusion (particularly given the proportion of households in need of housing that are without access to private transport). It is critical to recognise that people unable to afford the high central urban prices of housing are most likely to add to pollution at a number of pollution ‘black spots’ on key access routes. Providing maximum affordable housing within our urban areas would avoid adding to existing problems of pollution and congestion.</p> <p>SS3 Combination of locations outside and within the Green Belt</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

This is unacceptable, in principle and, because the overstatement of the housing requirement (given latest economic forecasts) (a) makes any use of the Green Belt completely unnecessary and (b) there is no mechanism available to ensure that sites and locations are developed in a hierarchy, so as to prevent any use of dispersed or Green Belt sites being permitted until “brownfield”, high density and easy access to Bristol have been utilised.

Chapter 4 Bath

BTH1 Policy approach Options for employment

No comment.

BTH2 Housing

The decline and change in high street retailing presents an opportunity, entirely overlooked in these consultations, for the conversion of “over-shop” premises into residential accommodation. CPRE are supportive of thriving high streets, and there are opportunities to combine residential and retail space to achieve a better mix and provide needed accommodation. This can include reviewing the conversion of entire shops to residential, where retail uses are unlikely to be economic, thus enabling people to live in the city and closer to their places of employment, reducing daily commuting. This option has long been identified but not acted upon. We believe that the “joined up” responsibilities of the new West of England structure should address the investment contributions to achieve it.

CPRE is also concerned about the absence of “joined up” policy making between B&NES and Wiltshire in respect of housing development to the East of Bath, within Wiltshire, which is contributing additional commuter traffic into Bath on what are already heavily congested and polluted routes.

BTH3, 4,5,6,7,8

No comment.

BTH9 Policy Options for Bath Park and Ride provision

CPRE believes there is a need to reduce congestion on the inner approaches to the city and thus, inter alia, improve access to essential services for rural residents. One solution to this may be the limited and sensitive capacity increases at the main park and ride sites. However we believe that primarily smaller sites should be identified further out from the major centres, in order to pick up commuters nearer to their homes. Several smaller bus pick up points could also be combined with existing car parking facilities. If this is followed it could open up opportunities for a far more efficient public transport network. CPRE will evaluate new proposals for a new park and ride site to the east of the city when these are published, but expects to see closer working with Wiltshire in the identification of the most effective sites.

CPRE remains of the view that the usefulness of park and ride sites can only be maximised if at the same time services from the sites into central Bath are guaranteed relatively free movement without intermediate stops or delays. We advocate more dispersed park and ride “hubs” further out from Bath which would reduce congestion on the approaches to the main park and ride sites themselves and minimise the extent of expansion of those sites. See above.

BTH10, 11 No comment



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**Representations received online:**

Chapter 5 Keynsham and N Keynsham SDL

KSM1 Spatial Strategy for Keynsham

CPRE believes that the spatial strategy for Keynsham is fundamentally misconceived. The overall housing requirement proposed by the JSP is well in excess of what is indicated by the most recent economic forecasts and it is the JSP requirement that is driving the strategy for Keynsham. The overall requirement should be reduced and Bristol required to provide more of its own housing rather than outsourcing it to neighbouring areas, leading to more congestion and pollution because of commuting. There are a number of suitable sites in Bristol, for example, new plans for the old "Arena" site near Temple Meads could incorporate much more ideally located housing, and especially affordable housing and less office and hotel development. It is also questionable whether a further Conference Centre is needed given the proposals for similar at the Bristol City Football ground. Looking at the most up-to-date economic forecasts, CPRE believes that the maximum additional housing requirement should be 73,400, which is some 28,800 homes less than the current JSP target figure. Adopting the lower, more up-to-date figure would largely remove the need for large-scale development at the SDLs, and thus also, many of the additional congestion and pollution problems, although the existing unacceptable levels of both still require significant intervention.

KSM2 Review of existing policies or Keynsham

No comment

KSM3 Garden City Principles

This policy is essentially aspirational and totally lacking both specifics and realism as regards deliverability. In particular, although the aspiration of much greater integration with the rest of Keynsham through cycling and walking is to be commended, the sustainability of the "garden city"™ is completely compromised by the impact of additional traffic on congestion and pollution and the lack of early provision of an integrated public transport system, as earlier comments have highlighted. The proposed package of transport measures outlined in other documents poses immense challenges in terms of construction, funding and planning consents, and requires early action ahead of developments if it is to succeed. We look forward to seeing WECA take its opportunity to develop a Bus Quality partnership as part of the process. As things stand the "garden city"™ concept is fundamentally flawed. There is little in the document to show how this differs from any other town extension. The position would be alleviated, to some extent, if the amount of Bristol's housing allocated to B&NES were to be reduced in line with the latest economic forecasts, as this would then also reduce the amount of commuter traffic moving between Keynsham and Bristol (see below).

KSM4 Link Road Alignment

There are huge problems with the development in transport terms. CPRE considers that while Option 3 a for the link road may be the "least bad"™ of the options available, it does not remotely start to achieve what is needed in order to make the "garden city"™ genuinely sustainable. There are already big developments progressing at the Chocolate Quarter (Fry Factory) and on the A4 at on the A4/Saltford boundary, with more safeguarded land reserved for development later. It has to be

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**Representations received online:**

remembered that Bristol is also planning housing at Brislington the same route into Bristol. Even if the new proposed road improvements are built, this will only amount to a temporary solution to a problem that requires long term, sustainable transport investment. All the statistics in the last 50 years show that increasing road space only encourages and enables more private car commuting, and new roads are filled up to over capacity within a few years (see CPRE, “The End of the Road: challenging the road building consensus” March 2017).

KSM5, 6, 7, 8, 9 and 10.

CPRE supports these proposals.

Chapter 6 Whitchurch SDL

WCH 1 Strategic Planning framework

CPRE takes the view that all of these options are unacceptable and misconceived. It is important to retain the “separation of settlements” that currently exists between Whitchurch and Bristol, for the benefit of Bristol residents, to retain their connection and access to local countryside, as well as for those of Whitchurch.

More fundamentally, CPRE considers that the overall housing requirement proposed by the JSP is well in excess of what is indicated by the most recent economic forecasts, and it is the JSP requirement that is driving the strategy for Whitchurch. The overall requirement should be reduced and Bristol required to provide more of its own housing rather than outsourcing it to neighbouring areas, leading to more congestion and pollution because of commuting. (for example, new plans for the old “Arena” site near Temple Meads could incorporate much more ideally located housing, and especially affordable housing and less office and hotel development, as well as more housing planned above current and future retail space.) Looking at the most up-to-date economic forecasts, CPRE believes that the maximum additional housing requirement should be 73,400, which is some 28,800 homes less than the current JSP target figure. Adopting the lower, more up-to-date figure would largely remove the need for large-scale development at the SDLs, and thus also, many of the additional congestion and pollution problems, although the existing unacceptable levels of both still require significant intervention.

WCH2 Garden City Principles

These policy options are too vague and aspirational for sensible comment to be possible at this stage but in the light of the above comments it is clearly most unlikely that the goals of a genuine “garden city” (such as has been defined in national planning policy) could possibly be achieved.

WCH3 and 3a Strategic design Objectives

CPRE has no difficulty with the general thrust of these design objectives which are in line with best practice. They do not and cannot however mitigate the unacceptable impacts of the strategic Whitchurch options currently proposed.

WCH4 Housing

Apart from the fundamental objection to the amount of housing proposed (see above) CPRE’s main concern about this policy is the lack of specificity and control over the proportion of affordable and social housing to be included. Past experience suggests that this is in the end invariably much less

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**Representations received online:**

than that initially proposed. Ways must be found to ensure that the proportions are sufficiently high initially and are not reneged on by developers.

WCH5 and 6

No comment

WCH7 Transport

The proposals for Whitchurch are fundamentally flawed when it comes to transport provision. It is recognised in JSP transport documents that the impact of development on this scale will generate traffic that will add to congestion and pollution on local roads. It is also recognised that there is effectively no scope for improving either the road capacity or the reliability and speed of bus services from the new Whitchurch Park and Ride into the city centre. The proposed new link road connects with the adjacent schemes at Hicks Gate and Brislington which also appear unlikely to cope with additional generated traffic, let alone improve the current situation which is already unsustainable.

The harsh reality is that there is huge uncertainty as to whether:

- (a) the proposed Whitchurch transport package can be funded (it will be competing for funds with infrastructure projects across the country);
- (b) all the complex planning consents can be secured;
- (c) the skilled construction labour force will be available;
- (d) the package can even achieve its very limited aim of mitigating the effects of the JSP.

These huge flaws underline, dramatically, the folly of capitulating to Bristol's plans to outsource its housing need (in large part for more affordable and social housing) to unsuitable outlying areas when doing so will create social, transport and environmental issues that are in fact entirely in conflict with the "Visions" for Bristol, B&NES and the whole WECA area as set out in the overall planning documents

WCH 8,9

No comment

WCH10 Proposed Policy approach for zero carbon

As present proposed policies stand this statement is clearly unachievable, and not improved by the approach shown above.

WCH11 Relocation of Brislington Park and Ride

CPRE recognises some merit in using the existing Park and Ride site for housing (it is marginally nearer the city). However relocating the P&R site will be inadequate in reducing the amount of traffic using the A4 between Bath and Bristol, and will do nothing to solve the traffic congestion and pollution problems in the whole Bristol and Whitchurch south-east "quadrant". This corridor needs to become a first priority for improved public transport investment.

SOM1 Policy approach for Somer Valley Enterprise Zone

CPRE broadly supports the strategy for the Somer Valley, recognising that it is, outside the Green Belt

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**Representations received online:**

and that the case for a better mix of industrial/employment and residential development is economically desirable. However, the unacceptable and growing levels of congestion and delay on all routes into Bath and Bristol require early investment in alternative transport options, such as Park and Ride within the Somer Valley area.

SOM2 and 3

No comment

Chapter 8 Development Management

DM1 Emerging Policy approach for carbon reduction

CPRE broadly supports this approach whilst repeating that the overall proposals are such that the approach is almost certainly unachievable without major changes to the overall strategy.

DM2 Emerging policy approach for harnessing wind energy

CPRE supports this approach subject to strict compliance with the stated objectives for minimising impact.

DM3 – DM 15

No comment

DM16 Emerging policy for electric vehicles infrastructure

CPRE supports this policy and looks forward to it being developed further.

DM17

No comment.

**Attachments Included:**

[http://www.bathnes.gov.uk/sites/default/files/webform/cpre\\_avonside\\_response\\_to\\_banes\\_local\\_plan\\_consultation\\_2019\\_0.pdf](http://www.bathnes.gov.uk/sites/default/files/webform/cpre_avonside_response_to_banes_local_plan_consultation_2019_0.pdf)

[http://www.bathnes.gov.uk/sites/default/files/webform/cpre\\_avonside\\_response\\_to\\_banes\\_local\\_plan\\_consultation\\_2019\\_1.pdf](http://www.bathnes.gov.uk/sites/default/files/webform/cpre_avonside_response_to_banes_local_plan_consultation_2019_1.pdf)

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Crest Strategic Projects and Stratland Hicks Gate Limited
<b>Name</b>	c/o Agent
<b>Agent (if applicable)</b>	Alder King Mr Simon Fitton

**Comment**

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

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Crest Strategic Projects and Stratland Hicks Gate Limited
<b>Name</b>	c/o Agent
<b>Agent (if applicable)</b>	Alder King Mr Simon Fitton

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 5 - Keynsham and North Keynsham Strategic Development Location (SDL)KSM11 - Other comments on Chapter 5
<b>Comment</b>
<p>There is little value in making detailed comments on the Keynsham SDL as the principle of it needs to be explored through the JSP examination. The SDL seems to offer few benefits to the existing Keynsham community and the infrastructure improvements are largely required to facilitate its delivery. The business case for the infrastructure does not appear in that context to be strong. For the reasons set out in our JSP representations there is insufficient evidence to justify this location ahead of more reasonable alternatives that are able to capture the benefits of existing infrastructure, and maximise the use of that which is planned. Where development and delivery of homes benefits from strategic infrastructure, the business case and prospects for securing funding will be much stronger. The Keynsham SDL does little more than “consume its own smoke” and detracts from securing funding for other more important strategic infrastructure along the A4 corridor.</p> <p>CSP and Stratland have consistently advocated that further development at the Brislington SDL extending into BANES is a far more credible option than further development at Keynsham. It has genuine scope to meet Bristol’s need at Bristol and benefit from existing and planned strategic infrastructure improvements.</p>

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**Representations received online:**

**Respondent**

<b>Company</b>	Crest Strategic Projects and Stratland Hicks Gate Limited
<b>Name</b>	c/o Agent
<b>Agent (if applicable)</b>	Alder King Mr Simon Fitton

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH12 - Other comments on Chapter 6
<b>Comment</b>
Similar to Keynsham, the issues regarding the justification of the SDL location will be established through the JSP. The principle of development at Whitchurch is not necessarily objected to, however, it will be for the JSP Officers to justify the anticipated delivery of 1,600 homes within the Plan period, given the lack of certainty that exists over the delivery of the southern orbital route; a pre-requisite before any housing completions can occur. BANES will have access to our representations submitted on the concurrent JSP evidence base consultation and will have sight of our submission on the Strategic Transport Studies that explore these issues in more detail.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Crest Strategic Projects and Stratland Hicks Gate Limited
<b>Name</b>	c/o Agent
<b>Agent (if applicable)</b>	Alder King Mr Simon Fitton

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH11 - Relocation of Brislington Park & Ride
<b>Comment</b>
<p>The relocation of the Park and Ride is acknowledged to form part of the emerging JSP strategy, and as the Sustainability Appraisal and paragraph 6.21.1 identifies, is required to facilitate the development of 750 homes at the Brislington SDL.</p> <p>Paragraph 6.22.5 is unclear in terms of the scope and intent of any Green Belt review. The JSP will set the context for Green Belt release in the general location to facilitate the delivery of the Brislington SDL. It is not clear from the Options Report whether it is the intent of BANES to exclude land within its administrative area to facilitate the park and ride relocation, or whether the park and ride will remain within the Green Belt.</p> <p>Whilst these matters will be resolved through the JSP examination, for the avoidance of doubt, in undertaking any detailed Green Belt review paragraph 139 of the NPPF requires local authorities to inter alia:</p> <ul style="list-style-type: none"> <li>c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;</li> <li>e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and</li> <li>f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.</li> </ul> <p>Officers will be aware that CSP and Stratland are promoting a wider more comprehensive form of development at Brislington/Hicks Gate that extends development north and south of the A4 into BANES land. Comprehensive submissions are made through the JSP and the masterplan document produced in support of those representations is reproduced as Appendix 1 of these representations.</p> <p>Those representations contend that in defining the new Green Belt boundary in this location, to accord with the provisions of NPPF paragraph 139, it would be baffling on every conceivable level not to revise the Green Belt boundary to exclude all land between the urban area and the existing A4174 and proposed extension of it to form the new southern orbital road to Whitchurch. Topography constraints combined with the proposed alignment of the orbital road would represent an obvious southern Green Belt boundary assuming the proposed alignment of the road is now fixed.</p>



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These are robust boundaries that are not otherwise based on a spurious and arbitrary local authority administrative boundary.

It would be impossible for BANES to demonstrate that the land identified above will not need to be altered at the end of the plan period. For all the reasons set out in JSP representations submitted to date the land represents a highly sustainable location for growth that would maximise the benefit of planned transport interventions. There is so little sense in failing to plan comprehensively for development now, albeit it is recognised that these are JSP issues and BANES will need to follow the outcomes of the JSP examination.

Nevertheless, the issue of the location of the park and ride and how that might impact on future forms of development should be at the heart of the decision making process. There appears no consideration of it whatsoever. Paragraph 6.22 identifies that appropriate connections to the Brislington SDL, A4-A37 link road and Keynsham will need to be considered. This is not disputed but it would fly in the face of sound spatial planning not to consider its role in shaping comprehensive forms of development. To comply with NPPF paragraph 139 the land will have to be removed from the Green Belt, heightening the need for consideration of longer term place-making objectives.

Indeed, the masterplan document (Appendix 1) demonstrates that CSP and Stratland have considered the relocation of the park and ride and also presented an alternative option of retaining it in its current location. It is after all only being moved to facilitate the 750 homes SDL in Bristol. Comprehensive consideration of the area and what it can deliver could help accelerate delivery (by not moving it) and saving money from the public purse. If the Park and Ride is to be moved, our evidence sets out the preferred location.

As landowner, both the (eastern) park and ride location and southern orbital route would traverse Stratland's land. It is acknowledged BANES has written to all affected landowners and invited them to a dedicated consultation session on 19 November. Again, consideration of a more comprehensive form of development would help accelerate negotiations through any future CPO process. The park and ride is being moved only to facilitate delivery of the Brislington SDL and thus any compensation will need to be based on an equitable basis related to the increase in land value on the existing park and ride site. Similarly a more comprehensive approach to development in this location could result in a different alignment to the southern orbital route. Again, Appendix 1 sets out an alternative alignment at the Hicks Gate/northern end that could maximise the area's potential. Whilst not wedded to a particular alignment, consideration will need to be given to the lost potential of a significant proportion of the Stratland land.

These will be complex discussions that will need to take place in due course. The fact that the Whitchurch SDL is so dependant on the delivery of the route, and the uncertainties that exist around its delivery and implementation should really signal a warning shot that requires further strategic land to be identified in BANES that is less reliant on such major infrastructure delivery. If the 1,600 homes at Whitchurch are to be relied upon for delivery within the plan period, then significant additional certainty over funding and delivery of the infrastructure required to support it will need to be presented.

**Attachments Included:**

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Crest Strategic Projects and Stratland Hicks Gate Limited
<b>Name</b>	c/o Agent
<b>Agent (if applicable)</b>	Alder King Mr Simon Fitton

**Comment**

<b>Local Plan Section/Chapter</b>	CHAPTER 3 - Spatial Strategy including the rural areasSS5 - Other comments on Chapter 3
<b>Comment</b>	<p>Paragraph 3.2.4 recognises that the JSP is subject to examination and to that end acknowledges that the “non-strategic growth” figure has yet to be properly tested. The Options Paper suggests that BANES should plan for a contingency in this category in the event that the number were to change.</p> <p>It is not clear why the same doesn’t apply to the overall housing requirement or any of the other categories of supply. Alder King has made clear through its representations on the JSP that a) the housing requirement should be substantially more than the 105,000 homes being planned for, and b) that there are significant objections over the SDL selection methodology, and the evidence and justification to warrant their selection. Moreover we query the ability of those SDLs to deliver in the numbers anticipated before the end of the plan period, not least given the level of “up-front” infrastructure required to support any homes in these locations, including at Keynsham and Whitchurch.</p> <p>It is acknowledged that these are JSP issues and that the LP will have to adhere to eventual outcomes of the JSP examination and adopted JSP. Nevertheless, at this stage of plan making, consideration of wider contingency options should be at the heart of plan-making given the BANES LP is being prepared in a cloud of uncertainty.</p> <p>As expressed at the Issues and Options stage there is a risk that investing significant resource into the preparation of the Plan, and in particular the evidence base that supports it is at risk of being ultimately abortive in the event that there is a significant change in the JSP spatial strategy. It is acknowledged that in the circumstances BANES is “between a rock and a hard place” and can’t be criticised for advancing the Plan, but nevertheless, the Options report should be more explicit about the degree of uncertainty in respect of the current position.</p> <p>It is not clear if as paragraph 3.2.4 suggests that the JSP Inspectors Report won’t be published until “the latter part of 2019” and paragraph 1.2.4 states that the Draft LP won’t be published until after the Inspector has reported, how can it suggest that the Draft LP will be published in summer 2019? We agree that it would be highly prudent to wait until the Inspectors Report is available and the implications properly understood. It therefore seems highly unlikely that the Draft LP will be available until late in 2019/early 2020.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Deeley Freed Estates (DFE)
<b>Name</b>	
<b>Agent (if applicable)</b>	Cushman & Wakefield Mr Chris Hays

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
<p>SB10 Roseberry Place</p> <p>DFE notes that the site-specific policy for Roseberry Place is proposed to be retained in its current form until the development of the site has been successfully completed.</p> <p>DFE obtained outline planning permission for a two-phase redevelopment of the site in August 2016. The first phase, comprising 171 flats and retail space, is currently under construction with the first flats due to be occupied in Spring 2019. The private rented sector (PRS) accommodation, the first of its type in Bath, has proved to be highly-attractive in the local housing market and it will also deliver policy-compliant affordable housing.</p> <p>The second phase, comprising B1 employment space (up to 4,500sqm gross floorspace for office use) has been actively marketed since September 2016 but has failed to attract firm occupier interest and progress to detailed planning stage over this period. Roseberry Place has been a prominent and well-known regeneration/employment opportunity site for a much longer-period, and notably through a period when supply (especially office floorspace) in the City was especially tight. It is now clearly apparent that the Roseberry Place site is highly unlikely to attract interest as a key office location, particularly with supply now moving forward at Bath Quays, a prime central location.</p> <p>With the balance of the Roseberry Place site showing little prospect of coming forward for significant B1 employment space, the development requirements of Policy SB10 need to be reconsidered. Specifically, the requirement to provide a minimum of 6,000sqm (GIA) B1 employment floorspace does not reflect development approved in outline, will be challenging to achieve viably in the context of development under construction, and is not proven to be of any firm interest to the market.</p> <p>Given the above, DFE encourages the Council to refresh Policy SB10 based on a realistic and market-facing review of the opportunity presented by the remaining (Phase 2) land. It is suggested that the policy should identify a range of land uses that will be acceptable in principle on this site but remove the requirement to provide a specific amount of B1 employment floorspace as part of the mix of uses. Acceptable uses for the site should be identified as residential, B1 employment, and complementary uses including retail/leisure/visitor accommodation (where shown to not adversely impact on existing centres). In this way, there will be less risk of the Phase 2 site remaining undeveloped and flexibility will be presented to bring forward additional residential units,</p>

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development providing job opportunities and supporting the local economy, and/or development in support of local community and visitor wellbeing.

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**Representations received online:**

**Respondent**

<b>Company</b>	Deeley Freed Estates (DFE)
<b>Name</b>	
<b>Agent (if applicable)</b>	Cushman & Wakefield Mr Chris Hays

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 8 - Development Management policiesDM1 - Carbon reduction
<b>Comment</b>
<p>DFE is committed to the principles of energy efficiency and sustainable building design and strive for the highest viable standards in their developments, achieved through a "fabric first" design approach and the adoption of renewable solutions where appropriate.</p> <p>Whilst the principles of Policy DM1 are supported, it is concerning that the proposed approach is currently untested from a practical perspective and in terms of viability. However, it is noted that the Council intends to undertake its own viability testing before formalising the policy approach, which is welcomed.</p> <p>DFE recommends that the Council adopts a flexible approach to carbon reduction which encourages both fabric efficiency and adoption of renewable measures but recognises that the approach and ability to achieve the zero carbon emissions target will be subject to viability and site context. Importantly, the requirement to offset what can't be mitigated on site through fabric and renewable measures should be reasonable in the context of evidenced overall project viability.</p>

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**Respondent**

<b>Company</b>	Deeley Freed Estates (DFE)
<b>Name</b>	
<b>Agent (if applicable)</b>	Cushman & Wakefield Mr Chris Hays

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 8 - Development Management policiesDM8 - Space standards for housing
<b>Comment</b>
<p>DFE wishes to highlight that rigid application of the Nationally Described Space Standard may work against optimising density and ensuring best use of land. In recognition of the stated fact that Bath does not have sufficient land to accommodate all growth pressures, it is vitally important to optimise density through a flexible approach to housing design and associated application of space standards. Flexibility in standards need not be at the expense of high-quality living environments. As widely recognised, a rigid standardised approach is not appropriate for all forms of housing development, especially build-to-rent models, student accommodation, retirement and assisted living models, as well as “micro housing”.</p> <p>DFE recommends that the DM8 policy approach should acknowledge the existence and operation of the Nationally Described Space Standard as a benchmark for assessing housing developments and confirm that the Standard will be applied in relevant cases. Policy should also confirm that the Standard will be waived in appropriate instances where a proposed housing model can demonstrate the achievement of a high-quality living environment.</p>

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**Respondent**

<b>Company</b>	Deeley Freed Estates (DFE)
<b>Name</b>	
<b>Agent (if applicable)</b>	Cushman & Wakefield Mr Chris Hays

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 8 - Development Management policies DM11 - Industrial land
<b>Comment</b>
<p>DFE supports the Council’s spatial priority of maintaining an appropriate supply of business land and premises. However, in line with comments made at the Issues and Options stage, DFE urge the Council to maintain sufficient flexibility in employment policy to enable re-use/redevelopment of employment sites that are vacant/under-used, no longer fit-for-purpose, or where there is otherwise confirmed evidence of lack of market demand. This includes land allocated for employment purposes that has failed to come forward within a reasonable period and where there is no reasonable prospect of it doing so.</p> <p>As highlighted previously, Bath has an abundance of peripheral employment sites that hold significant potential for addressing other identified development needs. Unlocking such sites through a permissive employment policy approach will generally encourage best use of previously-developed land and promote “urban living”.</p> <p>DFE’s recently-approved proposals for mixed-use development at the Old Bakery site, Jews Lane, demonstrate that a flexible policy approach for non-strategic industrial sites can help to address important development needs and that this need not be at the expense of local economic wellbeing. In this example, the partial loss of an established employment site will be mitigated through the secured provision of modern, flexible employment premises, representing a clear qualitative improvement. Such opportunities will be lost if the Council adopts an overly-restrictive policy approach for non-strategic industrial sites.</p> <p>Notwithstanding the above, DFE considers that the range of factors for assessing proposals resulting in the loss of industrial space set out in DM11 is appropriate. DFE would urge the Council to apply these criteria flexibly, particularly in instances where mixed-use development proposals offer compensatory provision of modern employment space. In all cases, the benefits of alternative uses, especially residential use, in support of sustainable local communities should form a key part of the planning consideration.</p>

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**Respondent**

<b>Company</b>	Deeley Freed Estates (DFE)
<b>Name</b>	
<b>Agent (if applicable)</b>	Cushman & Wakefield Mr Chris Hays

**Comment**

<b>Local Plan Section/Chapter</b>	
CHAPTER 8 - Development Management policiesDM17 - Management policies	Review of existing Development Management policies
<b>Comment</b>	
<p>CP9 Affordable Housing</p> <p>The Council’s housing policies should embrace a diversifying housing market including the emergence of institutional investment in the private rented sector and other ownership models (including affordable housing models), modern construction methods (eg. modular construction), and specialist market opportunities (eg. “pocket living”). This will in many cases require flexibility in the Council’s approach to securing affordable housing in terms of amount and/or tenure.</p> <p>A flexible approach to affordable housing provision was adopted by the Council in the determination of DFEs proposals for the Roseberry Place regeneration site in Bath, where private rented sector housing is nearing completion. In this case, DFE and the Council worked together to secure the viable delivery of policy-compliant affordable housing (discount market rent model) for the first development of this scale and type in the City. This is an example where flexibility in approach is leading to the early delivery of much needed housing suited to the prevailing investment/occupier markets and including affordable housing without need for public subsidy.</p> <p>DFE encourages the Council to provide an affordable housing policy that facilitates housing diversity, and which provides the flexibility to bring forward innovative and viable housing schemes, particularly on challenging urban brownfield sites. This approach will have an overall positive effect on meeting affordable housing requirements by stimulating increased market interest and activity. The policy approach should have full recognition of the definition of affordable housing and associated policy in the revised NPPF.</p> <p>DFE supports the Council’s suggestion that affordable policy should include its approach to Vacant Building Credit which should accord with Planning Practice Guidance.</p>	



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**Representations received online:**

**Respondent**

<b>Company</b>	Dunkerton & Tunley Parish Council
<b>Name</b>	Mrs Kathryn Manchee Parish Clerk
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>	
CHAPTER 3 - Spatial Strategy including the rural areasSS2 - the Green Belt	More dispersed approach avoiding
<b>Comment</b>	
Dunkerton & Tunley Parish Council would prefer to see SS2 Option 2 progressed i.e. a more dispersed approach avoiding the Green Belt.	

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Dunkerton & Tunley Parish Council
<b>Name</b>	Mrs Kathryn Manchee Parish Clerk
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 8 - Development Management policiesDM10 - Housing in Green Belt Villages
<b>Comment</b>
With reference to DM10 Proposed policy approach options for housing in Green Belt villages the parish council supports option 2 as the removal of housing development boundaries would allow housing development to be decided locally on a case by case basis. The parish council also supports the simplified definition of infilling.

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**Representations received online:**

**Respondent**

<b>Company</b>	East Harptree Parish Council
<b>Name</b>	Councillor Pam Lambert-Carver
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS3 - Combination of locations outside and within the Green Belt
<b>Comment</b>
<p>Whilst East Harptree Parish Council broadly endorses the strategy of focussing the majority of development in the Somer Valley locality (as described in Options One and Two), both of these options leave a remainder of 50 or 100 homes to be built on "smaller" sites at "other" villages, with no projection of what this might actually mean.</p> <p>We understand that you need to determine your overall spatial strategy before you could firm up any details, but it is of concern that you have not yet suggested any possible outcomes. For example, how many "other" villages would you then be looking at? Do you anticipate using the 'hierarchical' RA1, RA2 system or similar? At paragraph 3.5.2 your document notes that with your current policy approach, RA1 villages would have to have, in addition to other facilities, a primary school with capacity, or the ability to expand. If Green Belt villages are to be excluded, in our view this would appear to leave an un-workably small number.</p> <p>It is therefore our conclusion that neither Option SS1 nor Option SS2 would be sustainable, as they need to rely on such a small number of villages to 'mop up' the surplus requirement. As such, it is our view that you will need to pursue Option SS3, if you are to achieve a sustainable plan for the rural areas. We would urge you, therefore, to examine this Option.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	East Harptree Parish Council
<b>Name</b>	Councillor Pam Lambert-Carver
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS5 - Other comments on Chapter 3
<b>Comment</b>
<p>3.13.2 Re-drawing of HDBs: Because you have not completed your 'Rural Areas' Chapter, this proposal is not presented clearly. However, East Harptree Parish Council is very concerned about the possibility of Housing Development Boundaries being re-drawn in smaller villages to encompass sites assessed as 'suitable' through the HELAA process, but not included in the Local Plan. This would open the door for purely profit led, piece meal developments, without the safeguards of an overall view in terms of sustainability. The character of our small villages must be protected. This proposal would facilitate the sort of sprawl that is ruining so many rural areas and we especially oppose it in AONBs.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	East Harptree Parish Council
<b>Name</b>	Councillor Pam Lambert-Carver
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 8 - Development Management policiesDM14 - Residential Parking Standards
<b>Comment</b>
<p>East Harptree Parish Council strongly supports the following options:  District-wide differentiation: Option One  Garages: Option Two - Exclude garages and review the number of parking spaces for different sized dwellings.</p> <p>It is the view of East Harptree Parish Council that each community has very different needs for Parking Standards. Many rural villages do not have a full range of local facilities realistically accessible on foot or via public transport and a high proportion of residents need a vehicle in order to work. This results in a higher than average level of vehicle ownership per household. Those same villages often have very narrow / medieval lanes that get easily blocked for farm, emergency, and delivery vehicles if cars have to be parked on the street due to insufficient off-street parking in developments. For reasons such as this it is important to give flexibility to different communities to be able to tailor their own minimum off-street parking standards. An example of this happening in practice, is in the Chew Valley Neighbourhood Plan policy HDE8b</p> <p>Also, in these same rural communities it is very common for any garages to be used for storage or converted to living space and so not be available as an off-street parking space in the future.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	East Harptree Parish Council
<b>Name</b>	Councillor Pam Lambert-Carver
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 8 - Development Management policiesDM15 - Defining Parking Standards
<b>Comment</b>
<p>East Harptree Parish Council supports the policy to, 'Define parking standards in a separate Supplementary Planning Document (SPD)'.  Each community has very different needs for parking standards. Many rural villages do not have a full range of local facilities realistically accessible on foot or via public transport and a high proportion of residents need a vehicle in order to work. This may result in a higher than average level of car ownership per household. Those same villages often have very narrow / medieval lanes that get easily blocked for farm, emergency and delivery vehicles if cars have to be parked on the street due to insufficient off-street parking in developments. For reasons such as this it is important to give flexibility to the varying needs of different communities to be able to tailor their own parking standards.  We suggest that the Local Plan should just refer to the SPD or any made Neighbourhood Plan.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	East Harptree Parish Council
<b>Name</b>	Councillor Pam Lambert-Carver
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>	
CHAPTER 8 - Development Management policiesDM17 - Management policies	Review of existing Development
<b>Comment</b>	
<p>Policy D2: Local Character &amp; Distinctiveness.</p> <p>There is a proposal to amend D2 to give more detail on maximising housing densities on available land. Given the need to maximise the number of houses that are to be built, East Harptree Parish Council understands the desire to make efficient use of all available land. However, having a high overall target density can lead to inappropriate urbanisation in smaller rural villages that is totally at odds with their local character.</p> <p>We strongly support the view that any reference to Target Density in small rural villages should include the following caveat:</p> <p>'TARGET DENSITIES IN SMALL RURAL VILLAGES SHOULD BE CONSISTENT WITH THEIR PARISH CHARACTER ASSESSMENT'</p> <p>This position is consistent with the current policy in the Place Making Plan, policy D2: Local Character and Distinctiveness, but also reflects Paragraph 122, d) of the Revised National Planning Policy Framework.</p>	

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Englishcombe Parish Council
<b>Name</b>	Mrs Kathryn Manchee Parish Clerk
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS3 - Combination of locations outside and within the Green Belt
<b>Comment</b>
Englishcombe Parish Council has no preference between Options 1 and 2 but would not like to see Option 3 progressed i.e. they do now want to see development in locations within the Green Belt.



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Englishcombe Parish Council
<b>Name</b>	Mrs Kathryn Manchee Parish Clerk
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 8 - Development Management policiesDM10 - Housing in Green Belt Villages
<b>Comment</b>
With reference to DM10 and the proposed policy approach options for housing in Green Belt villages the parish council supports option 1 i.e. limited infilling within a housing development boundary.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	G R Planning Consultancy Ltd Acting for HHGL Ltd (Homebase)
<b>Name</b>	Mr Gareth Roberts Director
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
<p>The second paragraph under “Proposed Approach” for Policy SB7B suggests that the Homebase store on Pines Way in Bath is due to close in November 2018.</p> <p>The background to this appears to be the purchase of the Homebase business by Hilco Capital Ltd in May 2018. Hilco Capital purchased the business from Bunnings, following the latter’s unsuccessful attempts to rebrand Homebase as Bunnings Warehouse within the UK &amp; Ireland. Homebase was acquired by Hilco Capital with the specific aim of reinvigorating the Homebase brand through a return to its traditional retail roots. As part of this strategy, a Company Voluntary Agreement (CVA) was approved by creditors on the 31st August 2018 that would see the closure of 42 existing Homebase stores and the restructuring of other leases. Within the CVA, the Bath Homebase was categorised as a store that the business wishes to retain.</p> <p>In conjunction with the above, the Homebase site on Pines way was recently sold by British Land to Legal &amp; General (L&amp;G). This led to the need for discussions between Hilco Capital and the new owners (L&amp;G) over the current lease on the store, which in turn led to confusion and rumours over the future of the store. The discussions with L&amp;G culminated in an agreement to a new short-term lease that will, initially, guarantee the future of the Homebase store on Pines Way until potentially January 2020. At that stage or possibly earlier, there may be an opportunity to extend the lease further, subject to the position of L&amp;G in terms of any future redevelopment proposals they identify for the site.</p> <p>The wording of both Policy SB7B and the overreaching strategic Policy B2, within the current Core Strategy &amp; Placemaking Plan (adopted July 2017), resulted, in part, from an agreement reached between Homebase and the Council at the Examination in Public (Hearings) into the adopted Core Strategy. These Policies provide the option for Homebase to remain on the site as part of any redevelopment scheme or if that is not feasible or viable, for reasonable efforts to be made to ensure existing businesses, including Homebase, are relocated elsewhere. My clients continue to support that policy approach and would raise no objections to Policy B2 &amp; SB7B being reincorporated as currently worded within the Local Plan Review.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Hengrove & Whitchurch Park Neighbourhood Planning Forum
<b>Name</b>	Co Chair Hengrove & Whitchurch Park Neighbourhood Planning Forum Andrew Gamlin
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
<p>As Hengrove &amp; Whitchurch Park Neighbourhood Planning Forum we strongly object to the plans to build a link road between Whitchurch Lane and the A37 Wells Road to form part of an orbital highway.</p> <p>Whitchurch Lane is not suitable to handle heavy volumes of traffic. There is a primary school just off Whitchurch Lane and the crossing of roads will be more dangerous and there will be huge levels of pollution impacting both the school and residents who live on the road. Whitchurch Lane is a 20 miles per hour road, narrow with traffic calming measures currently in place. There are already proposals to build c.2500 homes in the ward of Whitchurch and Hengrove Park, which will massively impact the local area through congestion. Roads such as Fortfield Road and Bamfield Road will become rat runs. The Hengrove &amp; Whitchurch Park Neighbourhood Planning Forum does not have a road of this type built into our Neighbourhood Plan which is going to referendum in February. We are seeking to cut the car volumes within our ward and promote more green transport. We will oppose these proposals as they go against our Sustainable and Active Transport Policy.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	IJMcGill Transport Ltd
<b>Name</b>	
<b>Agent (if applicable)</b>	Argyll Design Partnership on behalf of Paul Campbell

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 5 - Keynsham and North Keynsham Strategic Development Location (SDL)KSM4 - Link Road alignment
<b>Comment</b>
<p>My Clients are concerned about the proposed alignment of the new link road if the option to link to Avon Mill Lane is taken.</p> <p>Option A fails to take into account the use of the site at the land identified in the report as being DH Smith site.</p> <p>The route proposed will prohibit the use of the existing buildings on the site and greatly reduce the area of land available for commercial use.</p> <p>Due account should be taken of the use of the land at Avon Mill Lane as part of consideration of the North Keynsham Development</p> <p>The previous proposals prepared by Halcrow in October 2013 should be given more weight as a suitable route through the DH Smith site at Avon Mill Lane.</p> <p>If Option A is chosen on grounds of cost then the constraints on the connecting link with the bridge in option C would not apply and any new link road through the DH Smith site can be moved to the North of the site as shown on the Halcrow proposals.</p> <p>Note Consultation website would not take upload of pdf of layout referred to above.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Ken Biggs Ltd
<b>Name</b>	Mr Nick Biggs
<b>Agent (if applicable)</b>	Cushman & Wakefield Mr Chris Hays

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 7 - Somer ValleySOM1 - Somer Valley Enterprise Zone
<b>Comment</b>
<p>My client and his associated company, Ken Biggs Ltd, are a major landowning interest at the Somer Valley Enterprise Zone (EZ) and their ownership encompasses adjoining agricultural land and the distinctive ‘Batch’ former coal working area.</p> <p>They are keen to bring forward employment-led development in support of the EZ whilst in tandem securing sustainable future uses and management of the Batch area. However, recent consultation with various facets of the Council has highlighted the significant challenges associated with development in this area, particularly in relation to commercial viability, environmental/planning constraints, and delivery.</p> <p>My client fully supports the proposed policy approach of widening the range of permissible commercial uses at the EZ as a means of assisting viability. The suggested inclusion of large-format comparison retailing, hotel, restaurant, and other ‘roadside’ uses will act in an enabling capacity and greatly improve the prospects for prompt delivery of employment floorspace. Importantly, the attractiveness of the EZ as a business location will be significantly enhanced by the presence of a complementary range of supporting facilities serving local workers and visitors. This will also have the added benefit of diversifying employment opportunities at the EZ.</p> <p>In terms of the subject land interest, a vital requirement in delivering EZ development is to safeguard and manage the Batch for the long-term, bringing to an end years of misuse and nuisance. The importance of this issue cannot be over-looked since the risk of continuing trespass and unsavoury activities at the Batch is unlikely to be tolerated by prospective EZ businesses and commercial operators. Essentially, delivery of a major part of the EZ will be incumbent on securing a viable future for the Batch and creating conditions that will not deter investment or occupation of EZ land. This is likely to involve a more intensive use of part of the Batch adjoining the EZ boundary (to create a ‘gateway’ to the EZ) but securing/enhancing the majority of the asset for the local community’s safe use and enjoyment. We expect the local planning authority to look at the EZ/Batch area holistically and exercise flexibility in the interests of delivering the EZ.</p> <p>Additionally, it is important to note that the northern boundary of the EZ is arbitrarily drawn across several open fields. This may in course cause severance and result in pockets of agricultural land that will be unworkable or of limited value. We will again expect the local planning authority to adopt a flexible approach to policy and development management so that adjoining land is not sterilised or</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

devalued by the EZ.

Additional flexibility of use within EZ planning policy is one means of improving confidence on development viability and this approach is wholly supported. However, challenges will remain in terms of meeting the significant infrastructure costs necessary and creating the right investment conditions to deliver the EZ. Council initiatives for infrastructure funding and delivery will need to go hand-in-hand with a flexible and permissive planning policy and development management approach to my client's land and the wider EZ.

My client and his associated company, Ken Biggs Ltd, are keen to bring forward development of their land in support of EZ objectives and look forward to ongoing discussions with the Council to help move this forward.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Kentucky Fried Chicken (Great Britain) Limited
<b>Name</b>	Mr Paul Stokes Head of Franchise Development
<b>Agent (if applicable)</b>	SSA Planning Limited Mr Steve Simms

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 8 - Development Management policiesDM13 - Fast food takeaways
<b>Comment</b>
<p>Firstly, we do not consider the term "fast food" helpful generally because the context implies that food served quickly must necessarily be less healthy than food served slowly and because it lacks precision (how fast would be unhealthy if speed were a determinant of healthiness?) or specifically in the context of planning as the only use class to which the policy is directed is Class A5, which relates to hot food takeaways. This in itself is problematic as it does not cover the wide range of other food outlets that serve food of equally variable calorie content and nutritional value.</p> <p>We consider that over-concentration of any one use in a town centre or wider catchment can be detrimental to retail balance. We further consider that healthy centres and lower-order facilities are essential to the creation and maintenance of neighbourhoods that are accessible by means other than the private motor car. Consequently, we are in favour of well-evidenced policies to control the proportions of all main town centre uses, but particularly to ensure an appropriate mix of experiential and non-experiential uses.</p> <p>We consider that the evidence for a link between the proximity of specifically hot food takeaways to particular land uses such as schools or youth facilities is limited and conflicting. There is a real risk that complete bans on such a basis will restrict walkable access in neighbourhoods that happen to be within the areas affected and will lead to retail decline in the centres and wider areas affected. These outcomes will be detrimental to levels of active travel, a key predictor of healthy weight, but also for jobs and the economy.</p> <p>In addition to an evidenced policy based around option 2, we consider that it is critical to have a clear understanding of walkable or cycle-able access to key facilities such as shops, services and good quality open space, but also to ensure that the access routes themselves comprise part of a wider green infrastructure that is planned and connected. It is also important to have an up-to-date Open Space Sport and Recreation Assessment to enable any local shortfalls in provision to be identified and addressed, thereby increasing the likelihood of sport and recreation uptake.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Keynsham and Saltford Liberal Democrats
<b>Name</b>	Duncan Hounsell
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS1 - Focussed approach avoiding the Green Belt
<b>Comment</b>
<p>We welcome the support given in the draft Local Plan to protect the character of villages particularly those swept over by green belt in that inappropriate large-scale housing development will continue to be resisted. The proposed less rigid definition of in-filling is sensible. However, there needs to be a policy that would allow for small-scale affordable housing development in an appropriate location outside the existing housing development boundary of a village should residents and the local Parish Council wish to have additional affordable housing stock that meets the needs of that village. If large-scale additional housing is needed above and beyond strategic sites already identified in the core strategy, the preference would be for a new village to be created rather than alter the character of existing settlements.</p> <p>The green gap between Keynsham and Saltford along the A4 corridor is very narrow. If the Avon Valley adventure and wildlife park is displaced eastwards by the new strategic development at Keynsham North, any portion of the park that then falls in the Saltford Parish boundary should have its green belt status made clear. My group would support B&amp;NES Council in giving planning reasons NOT to allow the following parcels of land to go forward for housing: SAL27b, SAL27c, SAL28, SAL01, SAL01a, SAL02, SAL03, SAL04, SAL05.</p>



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Keynsham and Saltford Liberal Democrats
<b>Name</b>	Duncan Hounsell
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 5 - Keynsham and North Keynsham Strategic Development Location (SDL)KSM9 - Avon Valley Adventure and Wildlife Park
<b>Comment</b>
The green gap between Keynsham and Saltford along the A4 corridor is very narrow. If the Avon Valley adventure and wildlife park is displaced eastwards by the new strategic development at Keynsham North, any portion of the park that then falls in the Saltford Parish boundary should have its green belt status made clear and then protected.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Keynsham and Saltford Liberal Democrats
<b>Name</b>	Duncan Hounsell
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
Any other comments
<b>Comment</b>
<p>If large-scale additional housing is needed above and beyond strategic sites already identified in the core strategy, the preference would be for a new village to be created rather than alter the character of existing settlements.</p> <p>Planned large scale strategic housing development (Core Strategy) such as in North Keynsham should only take place once necessary infrastructure and transport options are in place.</p> <p>Generally, new homes need to be built close to where there is employment in order to limit the need for commuting. Brownfield sites should be developed first.</p> <p>Bath and North East Somerset Council must insist that Bristol and neighbouring authorities have policies and plans that meet their own housing needs without recourse to using land unnecessarily in North East Somerset.</p> <p>There needs to be policy in place to discourage any form of "land banking" by developers and that planning consents are acted upon in a timely manner.</p> <p>We would support B&amp;NES Council in giving planning reasons NOT to allow the following parcels of land to go forward for housing:          SAL27b, SAL27c, SAL28, SAL01, SAL01a, SAL02, SAL03, SAL04, SAL05.</p> <p>There are NO viable options for a "by-pass" at Saltford and any reference, explicit or implied, to a by-pass or orbital road at Saltford needs to be taken out of the B&amp;NES local plan.</p> <p>A re-opened railway station at Saltford is viable, meets Joint Transport Plan goals, and would provide additional public transport to help meet the travel needs of those living and working on the A4 corridor, and others.</p> <p>Housing development should always be "plan led" by democratically accountable councils.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Keynsham Properties
<b>Name</b>	mr Andrew Paget Property Management
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 5 - Keynsham and North Keynsham Strategic Development Location (SDL)KSM1 - Strategy for Keynsham
<b>Comment</b>
<p>To keep the Town Centre commercial by making it as easy as possible for businesses and customers in keynsham.</p> <p>For Keynsham to remain a market town with a vibrant shopping centre/high Street, it has to be the easiest option for customers to get what then want compared to other nearby options, otherwise the high street aspect will not be supported. I strongly believe this is based on having a variety of shops that people can get to and a non restricted way to get to them.</p> <p>Car drivers need minimal cues of traffic, no parking charges and always enough parking spaces (Easy access with no upfront commitment of your time and costs before purchase)  A central bus stop that picks up people from the town (ease traffic, encourage local shopping)  Encourage cyclists (possible central cycle park that is covered and has CCTV footage for security)  Full array of shops so you can be likely to be able to buy what you need</p> <p>Shop owners are helped as much as possible in all aspects (extra hurdles in a difficult environment make online or out of town options more and more attractive)  Use of spaces like "The Space" and the area outside Sainsbury's be encouraged (offered cheaply and without difficult process to obtain use) to local business to allow them to host events, talks, seminars, meetings, training etc to offer more to their business than just the unit they work from.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Knight Frank LLP
<b>Name</b>	Mr George Yates Senior Planner
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
Any other comments
<b>Comment</b>
please see separate local plan representations

**Attachments Included:**

[http://www.bathnes.gov.uk/sites/default/files/webform/claverton\\_down\\_local\\_plan\\_reps\\_jan19\\_final.pdf](http://www.bathnes.gov.uk/sites/default/files/webform/claverton_down_local_plan_reps_jan19_final.pdf)

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Mendip District Council
<b>Name</b>	Mr Andre Sestini Principal Planning Officer
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS5 - Other comments on Chapter 3
<b>Comment</b>
<p>Mendip has the following comments and observations to make on the Options Consultation Please note these comments are at officer level only at this stage.</p> <p>Duty to Co-operate Mendip Council acknowledges there have been recent discussions in relation to the Local Plan options under the Duty to Co-operate and that further liaison will be necessary as this Plan progresses. Mendip is supportive of a constructive dialogue between the two councils in an appropriate timescale. It is particularly important to avoid poorly implemented speculative development.</p> <p>Chapter 1 It is noted that the options and the housing requirement remain subject to the JSP examination and that these are not yet finalised. In addition, delays in the JSP examination mean that the timing of this Plan is likely to change. The Council requests that BaNES continue to update neighbouring authorities on the progress of the JSP and its implications for timing and work on this Local Plan.</p> <p>Chapter 3 “ Spatial Strategy The council notes in para 3.24 that the Banes Local Plan requirement is subject to change dependent on the outcome of the JSP examination. This means that the 700 dwellings may or may not be the final residual figure for the Local Plan to accommodate. Mendip council is concerned at the reference to “contingency” planning in terms of housing numbers. It will be important to clarify how this will be approached by BaNES as the JSP progresses.</p> <p>The Council is concerned at the reference to a potential need for allocations to make up a shortfall from existing identified/allocated supply or from slower progress of the strategic sites in the JSP. Mendip supports the approach in para 7.97 that brownfield and existing allocations should be explored first and that new greenfield sites should be a “last resort.”</p> <p>The Plan indicates that non-strategic allocations will cover a range from 10 “ 500 dwellings. This scale of development (particularly above 100 dwellings) will have a significant impact in a local context on highways and infrastructure. The Council notes in sections 3.9 and 3.10 that further investigation and assessment is needed to test the impacts of development options associated with SS1 and SS2. In relation to the Westfield, Midsomer Norton and Radstock, this assessment should</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

take account of the consequential and cumulative impacts on settlements in north Mendip. Villages such as Chlcompton, Stratton on the Fosse and Chewton Mendip fall. These overlap within BaNES Primary School and Primary Care catchments. The council notes that local school capacity is one of the key issues in determining the spatial options.

The council supports an assessment of impacts on the highway network, particularly A37, A361 and A372. It notes that an interim Somer Valley Transport study supports the options Plan and would welcome further dialogue on cross-boundary highway impacts and accessibility.

Para 3.6.8 makes reference to discussions on cross-border growth, south of Midsomer Norton. It is noted that sites in Mendip have not been identified as options in this consultation, assessed in the interim sustainability appraisal or in the Housing and Employment Land Availability Assessment. However, for the avoidance of doubt, the current adopted core strategy does not support development in this location and no allocations are proposed in Local Plan Part 2. The Council intend to submit Local Plan Part 2 under transitional regulations in January. This makes provision above adopted local plan requirements focused on the primary towns in the district and the council does not require additional locations in this area to meet its housing need. It must also be stated that the promotion of land on the edge of Midsomer Norton and Radstock is strongly opposed by the Parish Councils in this area. The Council have committed to a review of the adopted core strategy in 2019 which would be the relevant context for discussions under the duty to co-operate (DTC). This review will be prepared under the revised NPPF. In the context of DTC, any consideration of development options in Mendip would require early and comprehensive engagement with the affected Mendip Parish Councils and joint consideration of infrastructure impacts and sustainability appraisal.

**Other matters**

The Council notes the intention to review/revise development management policies. Some of these cross boundary implications, particularly Green Infrastructure planning , landscape sensitivity and wind energy policies.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Midsomer Norton Town Council
<b>Name</b>	Cllr Michael Evans Chairman Midsomer Norton Town Council Planning Committee
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>	
CHAPTER 3 - Spatial Strategy including the rural areasSS1 - Green Belt	Focussed approach avoiding the
<b>Comment</b>	
<p>Midsomer Norton has had considerable housing development in recent years as a result of approvals before the Core Strategy was approved. Then under the Core Strategy we took further houses. The result is that we have an infrastructure and employment deficit. As a result we do not believe the statement "Midsomer Norton.... have a good range of services and facilities to meet the daily needs or residents and workers" is correct. Therefore Option 1 focusing on Midsomer Norton, Radstock and Timsbury would have an excessive detrimental impact by exacerbating the current pressure on infrastructure and services.</p>	

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Midsomer Norton Town Council
<b>Name</b>	Cllr Michael Evans Chairman Planning Committee
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>	
CHAPTER 3 - Spatial Strategy including the rural areasSS2 - the Green Belt	More dispersed approach avoiding
<b>Comment</b>	
We support this option because it places less pressure on our already stretched infrastructure and services. That said we urgently need more infrastructure to tackle the current deficit in Midsomer Norton including i) Road improvements at key junctions as well as the main link from Farrington Gurney to Midsomer Norton and a relief road up Millards Hill through the Cam Valley up to Peasedown Flat, ii) Additional school places and iii) additional primary care facilities in the form of a new Medical Centre.	



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Midsomer Norton Town Council
<b>Name</b>	Cllr Michael Evans Chairman of Planning Committee
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 7 - Somer ValleySOM1 - Somer Valley Enterprise Zone
<b>Comment</b>
<p>We fully support the concept of an Enterprise Zone in order to provide local jobs to address the serious imbalance between housing and jobs in Midsomer Norton which has a 70% commute out rate for work. It is therefore crucial in our view that the Enterprise Zone is used as an opportunity to create quality jobs rather than low skilled/low paid jobs in Food and Retail. We are also concerned that more space simply for Food and Retail will displace jobs from Midsomer Norton Town Centre and Paulton. We would support provision of food and drink ONLY on a limited scale to meet the needs of the immediate businesses on the Enterprise Zone as with the Cafe (Porkys) at Westfield Industrial Estate. The Zone provides a unique opportunity to develop a themed centre of excellence in the Somer Valley and it is this approach which we strongly advocate on the basis that businesses will be drawn together and become interconnected/benefit from synergy. We do also support a budget hotel as we see this as both in line with the needs of the commercial sector as well as boosting our tourism which outside Bath could offer an affordable alternative base to visit Wells/Glastonbury/Mendips etc with a day in Bath.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Midsomer Norton Town Council
<b>Name</b>	Cllr Michael Evans Chairman, Midsomer Norton Town Council Planning Committee
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 7 - Somer ValleySOM2 - Town centres and retail provision
<b>Comment</b>
Firstly we are puzzled by the term 'Business Quarter' when always in plans and discussion with B&NES we have talked in terms of the 'Business Core' - referring to the area between the Lower High Street and South Road. Car parking in the town is a sensitive issue and we support the policy of not allowing development which reduces spaces. That said, we would also like to challenge new developments which assume that parking will be provided in South Road. The reference here to 'Review Car Parking Provision' is very vague and we would like to ensure that it in no way sets an agenda for the introduction of parking charges in South Road which would have a devastating effect on an already fragile retail trading sector.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Midsomer Norton Town Council
<b>Name</b>	Cllr Michael Evans Chairman, Midsomer Norton Town Council Planning Committee
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 7 - Somer ValleySOM3 -      Review of existing Somer Valley policies
<b>Comment</b>
Under the Duty to Co-operate with Mendip there is reference made to housing development at the White Post site bordering Midsomer Norton/the B&NES boundary. We strongly oppose the idea of Mendip 'bolting on' large numbers of houses to Midsomer Norton leaving B&NES and Midsomer Norton Town Council and the Community to shoulder the burden of meeting infrastructure requirements at all level - yes roads, housing, schools etc. but also increasingly community services increasingly run by the voluntary sector. If such development is deemed essential THEN there should be a border change to include space for Midsomer Norton to expand as a community in itself.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	National Trust
<b>Name</b>	Mr Mark Funnell Planning Adviser
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS3 -      Combination of locations outside and within the Green Belt
<b>Comment</b>
SS3 outlines an approach to new development involving "suitable opportunities around Bath", and Diagram 7 includes similar wording. We would be concerned about the potential impacts on the Green Belt and on the green setting of the city, including the World Heritage Site and its setting, should such an approach be taken.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	National Trust
<b>Name</b>	Mr Mark Funnell Planning Adviser
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
We support section 4.9 on the Historic and Natural Environment.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	National Trust
<b>Name</b>	Mr Mark Funnell Planning Adviser
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
<p>The Trust's interest in the future development of UoB's Claverton Down campus stems from our ownership of Bushey Norwood to the east. This lies within the AONB and Green Belt, and provides greenspace for the benefit of people and wildlife (being part of the Skyline walk and providing important foraging for various bat species).</p> <p>The Options document includes the elements of UoB's emerging masterplan, whilst acknowledging that the document is not endorsed by the Council. The diagrams show new residential buildings (i.e. PBSA) adjacent to Bushey Norwood, some within the area of the campus where the Council accepts intensification in principle, but some within the AONB where there is currently car parking and a sports field.</p> <p>The points we would like to raise are as follows:</p> <ul style="list-style-type: none"> <li>• Should any new residential buildings be taken forward along the eastern edge of the campus, it would be important that their scale and massing respects their location within the AONB or its setting, and the proximity to Bushey Norwood.</li> <li>• We support the need for a landscape buffer along the eastern boundary of the campus to mitigate the potential impact on Bushy Norwood and the AONB (as per page 17 of the emerging masterplan). This landscape buffer should be as wide and robust as possible.</li> <li>• For the PBSA buildings proposed in the AONB, the emerging masterplan shows an attempt to break up the buildings (rather than have one large mass of building). This is welcomed, although it could potentially go further, with an approach similar to the more dispersed 3-storey buildings at Eastwood (northern tip of the campus).</li> <li>• Any new PBSA development should not rely on the tree screening across the boundary in Bushey Norwood, but should incorporate new tree planting in the landscape buffer and retain existing trees where possible.</li> <li>• New development at the eastern campus edge, including the proposed 3G sports pitches, should aim to minimise light pollution. We support the need for a lighting strategy (as per page 16 of the emerging masterplan) to limit the impact on bats etc along the wildlife corridor between our boundary and the university buildings.</li> <li>• Finally, Diagram 13 of the Options document (and several plans in the emerging masterplan) shows a pedestrian access point/gate from the eastern campus boundary into Bushey Norwood. This is only a permissive access and it would be helpful if the masterplan reflected this. Should issues arise in the future, its use may have to be reviewed, for example by limiting access to manage erosion.</li> </ul>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	National Trust
<b>Name</b>	Mr Mark Funnell Planning Adviser
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
<p>BTH9 states an intention to identify land for park and ride development, including new provision East of Bath, and to allocate this in the Local Plan. This would require removing land from the Green Belt, which could only be done if “exceptional circumstances” are demonstrated.</p> <p>Para. 4.21.7 states that the Council has consulted on the most appropriate location to the East of Bath, although “no final decision has been made on a preferred site”.</p> <p>As indicated over recent years, the National Trust recognises the challenges of transportation in Bath, yet we would be concerned if a new park and ride site was promoted in a location that harmed the green setting of the city, including the World Heritage Site, the AONB and their settings.</p> <p>Previously proposals for a park and ride development at Bathampton Meadows were dropped, with the Council stating (in July 2017) that neither of the sites being considered would be suitable, and that they would be “removed from the table”. Instead, the Council committed to pursuing other traffic and transport measures. It is not clear from the Options document what progress has been made on pursuing these other measures.</p>



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	National Trust
<b>Name</b>	Mr Mark Funnell Planning Adviser
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 8 - Development Management policiesDM18 Other comments on Chapter 9
<b>Comment</b>
<p>Para. 8.17.1 (WoE Green Infrastructure Plan and Local Plans) states: “The West of England (WoE) Authorities recognise the critical role that a healthy, functioning natural environment and multi-functional green infrastructure plays in supporting sustainable growth and communities. The Joint Spatial Plan commits the authorities to develop a WoE Green Infrastructure (GI) Plan and to delivering a “net gain” for the environment” .</p> <p>From a National Trust perspective, we support the above. In addition, and in relation to the GI Plan, we would want this to be ambitious in its aims, to ensure the delivery of robust mitigation, and to be formally adopted in a way that gives it significant weight and status in decision-making.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Pulteney Estate Residents Association (PERA)
<b>Name</b>	Mr Peter Knight
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
<b>Comment</b>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Pulteney Estate Residents Association (PERA)
<b>Name</b>	Mr Peter Knight Treasurer (standing in for the chairperson)
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
<p>I am commenting on behalf of PERA. It is stated under BTH11 that it is proposed to make no amendments to SB2. In the light of recent studies into the clean air zone and early proposals for the new rugby stadium on the recreation ground (Dec2018), PERA would propose several changes to SB2 so as to further protect and enhance this ecological and culturally sensitive area of Bath.</p> <p>1. Under the "Riverside East" section. There should be no increase in parking facilities on the rec. Adding a significant car park on the recreation ground would not only add to pollution in the area adjacent to the rec (which CAZ data shows is already highly polluted), but located in such a central area of Bath it would be contrary to BANES stated aims which are to reduce off street parking capacities (4.21.3).</p> <p>2. Also under "Riverside East", It should be made clear that any development should not ingress any further onto the historic green space of the rec and that the height of any development should not obscure any of the historic views currently visible.</p> <p>3. Under "Riverside East" there should be recognition that the east side of the rec (to the east of the current east stand) should remain green space.</p> <p>For information: PERA is a residents association of approximately 300 households that border the rec and surrounding streets. Further information on this issue can be found on our website <a href="http://www.pulteneyestates.co.uk">www.pulteneyestates.co.uk</a></p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Saltford marina
<b>Name</b>	Ms Jo Pickup Manager
<b>Agent (if applicable)</b>	Chris Corcoran Planning Mr Chris Corcoran. MA Dip TP MRTPI

**Comment**

<b>Local Plan Section/Chapter</b>																								
CHAPTER 5 - Keynsham and North Keynsham Strategic Development Location (SDL)KSM6 - Potential marina locations																								
<b>Comment</b>																								
<p>see attached Doc 1 Comments</p> <p>Doc 2 App1 Broadmead marina Appeal decision Feb 2017Marina Locations Policy Option: Keynsham: KSM 6 : Comments and objections on behalf of Saltford Marina by Chris Corcoran MA Dip TP MRTPI.</p> <p>1. The objector.          These comments are on behalf of the owners and operators of Saltford marina; this is a long established boatyard and marina on the navigable waters of the Avon within the BANES area and adjacent to Keynsham.          Saltford Marina comprises an off line basin of approx 0.5ha waterspace with 85 berths and about 17 on line moorings; some of these are broad beam boats; services include washing showers refuse disposal electricity, parking for the boaters with an onsite management office. Some of the boats are residential</p> <p>2. The Agent          I have been the Planning advisor for Saltford Marina for about 15 years, during much of which time I was the Planning advisor to the British Marine Federation and was also advising the Association of Inland Navigation Authorities on its Advisory Document "Residential Use of Inland Waterways" Feb 2011, which is part of the evidence base for the Water Space Study. Between 2015 and 2017, I objected on their behalf to the 324 berth marina at Broadmead (see below) and took part in the hearing.</p> <p>3. The Consultation proposals/options for mooring and marinas.          Policy options KSM 6 proposes five marinas of different size and occupancy, and shows four locations on diagrams 24 and 29 all bordering the river.</p> <table border="0"> <tr> <td>1.</td> <td>Commercial</td> <td>245</td> <td>3.1ha</td> </tr> <tr> <td>2.</td> <td>Commercial</td> <td>300</td> <td>4.6ha</td> </tr> <tr> <td>3.</td> <td>Off line basin</td> <td>17</td> <td>1.0ha</td> </tr> <tr> <td>4.</td> <td>Off line basin</td> <td>20</td> <td>1.0ha</td> </tr> <tr> <td>5.</td> <td>Off line basin</td> <td>52</td> <td>3.1ha</td> </tr> <tr> <td></td> <td>Total</td> <td>634</td> <td></td> </tr> </table> <p>All berths appear to be based on narrow boat dimensions          The options range from creating all of these marinas/basins to constructing only one to any</p>	1.	Commercial	245	3.1ha	2.	Commercial	300	4.6ha	3.	Off line basin	17	1.0ha	4.	Off line basin	20	1.0ha	5.	Off line basin	52	3.1ha		Total	634	
1.	Commercial	245	3.1ha																					
2.	Commercial	300	4.6ha																					
3.	Off line basin	17	1.0ha																					
4.	Off line basin	20	1.0ha																					
5.	Off line basin	52	3.1ha																					
	Total	634																						

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combination of the above. Using the Water Space Study number of boats (700), and discounting the approx 130 boats on the Canal section of the Kennet and Avon, between Bath and Dundas Aqueduct, this gives approx 570 boats on the Avon River. The 634 moorings are a 120% increase in the current number of boats moored on the Avon, and all in a single reach of the river. The marinas are in the range of 40% to 48% increase.

All the marinas/basins are shown as being constructed in what is currently Green Belt. It is not clear from the options plan where the new boundary of the Green Belt is to go; the consequence is that either the plan will be proposing these five marinas within the Green Belt or justifying the change in the GB boundary on the basis of these proposals. Consequently National Green Belt policy for both exclusions of land from GB, and for development within it, is key to these proposals. The Council does not have a free hand in this but shows no recognition of the parameters. A series of appeal decisions on marinas in the GB over the last six years give a clear picture of the tests applied to establish "every special circumstances". See evidence to Broadmead marina Appeal App 1.

In addition to the marina proposals, diagram 30 on p 87 identifies extensive lengths of the Avon as potential additional mooring areas. Although there is no estimate of numbers, these options should be considered cumulatively until specifically rejected.

The environmental impacts of the marinas and the river bank moorings have not been assessed; the Sustainability Appraisal which accompanies the Consultation is only in the broadest terms.

4. The Broadmead marina appeal Feb 2017

An application for a 324 berth marina on the Broadmead peninsula was lodged in 2015, supported by a full Environmental Statement. The application was refused by BANES council and this decision was appealed. The evidence and the supporting arguments were considered at a hearing in January 2017 and the decision was issued in Feb 2017. It was dismissed: Ref: APP/F0114/W/16/3142676 Land off Broadmead Lane, Keynsham. The particular significance of this appeal is that its location is in the same location as the 300 berth marina now proposed; the impacts of the proposal were considered in detail and were found to cause harm and the arguments of need were found to be too insubstantial to support a marina of this size.

However no mention is made of this case neither in the Water Space Study nor in the Consultation document. This decision, with the Environmental Statement, and the officer's reports and evidence to the Appeal, should form part of the Council's evidence base. They appear to be in conflict with what the council is now proposing. A copy of the appeal decision is attached. App 1.

Objection and comments of Saltford Marina

My clients object to the proposals for both the marinas/basins and the online moorings on the following grounds:

1. The proposals are not justified by the evidence base.
2. The excessive numbers of berths
3. The consequent impact on the river and other users.
4. The policy would encourage excessive narrow boats)
5. The proposals would fail the GB tests set by NPPF
6. Harm to the strategic Green Corridor
7. Lack of ecological input
8. Failure to take account of the evidence or Appeal decision on the Broadmead Marina App 1
9. Impact on neighbouring marinas and yards
10. The proposal will not deliver what many of the residential boaters are seeking
11. In addition the proposals for moorings along the Avon cannot be reconciled with the multiple roles of the river which are of higher priority.

In support of the above:

1. The proposals are not justified by the evidence base.

The Water Space study (WSS) relies heavily on the boater survey to justify the provision of additional

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
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residential moorings. The survey does not distinguish between the Canal section (Bath to Dundas ) and the river section (Bath to Hanham). The characteristics of the two are very different; from the responses set out in the Appendix to the WSS, the main group of liveaboards are on the canal, where their rights and complaints are with the CRT as the owner and manager of the canals. Few of them have any wish to go on to the Avon and fewer to go into marinas. There is thus no basis for extrapolating residential need from the survey statistics.

The WSS does not take account of the sports use of the Avon in particular, rowing on the Salford to Bath reach and sailing on the reach down stream of Salford. Both require the full width of the river and both can be disrupted by passing boats, especially the narrow ones which are less manoeuvrable. WSS takes inadequate account of the Green Corridor aspects of the river, in particular the needs of wildlife to adapt to the loss of open habitat to development, the safeguarding of existing species and maintaining wholly undeveloped and tranquil reaches of the river, which are valued by all current users.

WSS does not adequately take account of the strategic role of the river as the green corridor in the context of population and housing growth, which must necessarily reduce the scope for minority interests, such as unregulated mooring.

2. The excessive numbers of berths

The WSS provides no statistical justification for the extra berths. An increase in 624 berths would equal some of the largest marinas in the country located where there are ample choice of cruising grounds; the marinas of 300 berths. Here the opportunities are effectively limited to the 10 mile length of the Avon between Hanham and Bath and demand is also limited. The reasons for this are clear and were set out in my objection to the marina proposal on this site as follows:

“Why Are There So Few Marinas/Moorings in the Keynsham, Bath, and Bristol Area?”

The Kennet and Avon Canal is in effect an extremely long cul de sac, which stretches the whole way from the start of the Kennet and Avon Canal near Reading and finishes in the Floating Dock at Bristol. It is not a link in the canal/inland waterways network, as claimed. Beyond Bristol, the waters of the navigable Avon are tidal and of exceptional tidal range. The Avon then flows into the Severn Estuary which is, of course, navigable but for which narrow boats is ill suited. In Nicholson’s Waterways Guide no 7: “The River Thames and Southern Waterways”, the standard manual, the navigational notes read as follows:

1. “Do not navigate in tidal waters without charts, tide tables, anchor and all the other essential safety equipment; Seek expert advice if in any doubt. Inland waterways craft do not navigate the Severn Estuary to Sharpness (and vice versa) but this is a foolish practice without suitable weather conditions and the services of a river pilot;”

2. “Most insurance policies covering inland craft do not include cover for tidal waters.”

The passage in open water in the Severn Estuary to Sharpness cannot be accomplished within a single tide and then the canal boat is normally beached on sandbank or mud waiting for the rising tide. The passage beyond Bristol is so difficult that it is attempted by very few, so Bristol Docks would usually be the end of any tour to be followed by the retracing of footsteps.

Eastwards from Keynsham, the entry to the Kennet and Avon Canal is below Bath. The flight of locks leading through Bath to the upper levels is approximately two hours and during busy periods frequently much longer. It is not a task which can be done in an evening or with any ease during a weekend. River Avon between Bristol and Bath is an isolated stretch of navigation of 11 miles and 6 locks with no connection to other navigable waterways other than those described.

The River Avon itself has severe drawbacks. It is river navigation subject to great variations in flow and level for prolonged periods in winter and during any substantial rainfall the River is not safe to navigate, particularly for narrow boats which are not easy to handle in strong flows, being designed for canals rather than rivers.

Even the use of Bristol at the western end has drawbacks since this is subject to different jurisdiction and an additional fee has to be paid to the Bristol City Council as Harbour Authority.”

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For the above reasons, the attraction of this part of the Inland Navigation system is less than other interconnected navigations; visitors are few.

4. The option would encourage excessive narrow boats

The location is unsuitable for a large concentration of narrow boats which are essentially for touring on the canal system. Smaller day boats are better suited to enjoying the waters of the Avon and making the least impact on their surroundings.

5. The proposals would fail the GB tests.

The GB tests are set out APP 2; Exceptional circumstances are required for the boundary changes. Very special circumstances (VSC) are required for development within it. A 324 berth marina failed the VSC test in Feb 2017, and would still do so. Additional justification on grounds of need plus addressing a range of issues identified by the Inspector seems likely to be required for either situation.

8. Failure to take account of the Broadmead evidence and appeal decision

This important decision on a major proposal in the GB gives ample evidence of the nature of the construction, its impact on the landscape and on the openness of the GB and on ecology. It is based on full engineering and geological data and subsequent appraisal both by the applicant's experts and the Councils. One major problem is that the marina has to be dug to 4m below ground level and the resulting spoil disposed of. The 4.6ha marina produces approx 184,000 cu m. It cannot be placed on flood land and so must either be exported for dumping elsewhere or used for ground rising on otherwise useable land. A 2m rise in level would use up 9 ha of otherwise useable land. Both the council and the inspector found that this impacted on the character of the GB.

9. Effect on the economy of the other marinas and yards on the Avon.

The proposal, whether for 643 berths or 300 or 245, with inadequate evidence of demand at this level, and contrary to the experience of these businesses, would have a major impact on the existing boatyard business which rely on the moorings fees to make them viable.

Option proposed by Saltford Marina

My clients, Saltford Marina, agree that:

1. Provision for additional moorings is required
2. Keynsham/Broadmead is an appropriate location from the river point of view.

They propose that:

3. The additional moorings should be provided in a single marina basin. Note 1
4. The berths should be for:
  - visitors for short periods ( narrow boats)
  - small day boats without accommodation
  - relocation of moorings from the Avon (narrow boats ) Note 2
  - Residential moorings for boaters with Children in education in BANES or in need of care (narrow boats) Note 3

No other narrow boats should be provided for. Note 4.

5. The numbers should not exceed 100. Note 5
6. The marina should be first subject to a full EIA to determine its multiple impacts Note 6
7. The marina should be designed to act as a transition/ buffer zone between the densely developed garden village and the green Corridor of the River Avon. Note 7
8. Appropriate management and facilities should be put in place. Note 8.
9. The exclusion from the Green Belt of the land for the marina can be justified on this basis Note 9
10. The development of this marina would also be justified as very special circumstances if the land were to be retained in the green belt Note 10

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11. No additional moorings along the banks of the River Avon should be provided. Note 11
12. My clients also support the provision of non powered floating homes.

Notes: .

1. Single marina basin. Marinas are major engineering works; in this case as the Broadmead marina evidence shows (see Environmental statement) , the dig is approx 4 m deep to match the water level of the Avon. The volumes of dug material are approx 500,000 cu m. In the case of this application all was disposed of by ground raising; the landscape impact was a key reason for refusal. The extent of this proposal is several times larger with less scope for spoil disposal. Any marina should have the minimum land take. The economics of running a marina point to the need for a critical mass. The management of a marina is a hand on business, in particular where there are a number of liveaboards. To secure the proper level of supervision, again a critical mass of boats is required.
2. The level of the Avon in the several stretches is significantly below the adjacent ground; including the Keynsham/Broadmead reaches, where there are about 25 residential moorings. Works are required to the banks of the Avon for regular mooring to ensure safe and secure mooring in times of high flow, preferably with a fixed pontoon. Parking and access and on shore servicing involve additional works; residential boaters naturally wish to protect their immediate space; all of this has a disproportionate and negative impact on the appearance of the river bank, which is one of the most sensitive environments and of high amenity for other users. This is in contrast with canal side moorings where the made towpath gives access and provides a clear limiting to the rights of liveaboards for land based sheds and storage 9(i.e. None)
3. The provision of residential moorings needs to include liveaboards with children and who are already established in BANES. It should also provide for liveaboards who are elderly and have regular need for medical care. This sort of social provision is part of the meeting of special housing needs. Other classes of liveaboard have multiple choices for the solution of their housing needs.
4. Moorings along the banks of the Avon is, as we understand it, permitted, provided there is no fixed structure i.e. tying up overnight to a tree. However the provision of a fixed mooring requires planning consent and the consent of the riparian owner and that of the EA. The reasons for not allowing any increase in riparian mooring are many, including danger to the moorer from increased flow as well as the various harms set out in Note 2 above.
5. As the Inspector in the Broadmead appeal has set out, the justification for 324 berths was inadequate. See Appeal decision App 1. No additional numerical justification is provided by the WSS. The experience of Saltford Marina is that the additional demand from visitors and local people is low. The limit of 100 berths with clear guidance as to the composition of the moorers allows local demand to be met, tailored to local needs and priorities.
6. The need for an EIA for the mooring proposals is clear from the Marina application for 324 boats. The Inspector was helped to his decision by the understanding of the scale of excavation and construction works and the effect on the landscape and the ecology . See App 1. The same effects are likely if any of the marina options are chosen.
7. In some cases marinas can have positive environmental and ecological benefits , if planned on a generous scale and in the right topography. Here the depth of the marina (4 m below ground level) and the use of the fill for ground raising, makes integration into the landscape difficult. Either the marina should take up the minimum space and is essentially a boat park for touring boats, local small boats and liveaboards, or be planned generously so as to act as a buffer between the urban area and the Green Corridor of the River. However the greater the excavation the greater the volumes of fill
8. The owners of marinas have extensive experience of liveaboards; they require active management.
9. For the changes in the boundary of the green belt ‘‘exceptional circumstances’’ must be shown. The test is apparently not as stringent as ‘‘every special circumstances’’ for development in the Green belt. The boundary of the GB is to be changed to allow for the new



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settlement/garden village on the Broadmead peninsular. It is not clear from the Options consultation where the new boundary is to be set. We presume it will be the minimum needed for the new village. Hence the marina would still be in the GB. It seems most unlikely that the marinas/basins put forward in the Options consultation would be classed as exceptional circumstances as there is so little evidence of demand on this scale and in the light of the harm shown by the Broadmead appeal see APP 1. The smaller marina with the composition proposed above would however pass the stricter tests of "every special circumstances" and would pass the various tests which Inspectors have applied in the 5 major marina appeals in the GB over the last 5 years.

10. ...as above

11. .... as Note 2 above

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Appendix 1: Broadmead marina appeal decision Feb 2017. Attached

Appendix 2: Criteria for changing Green Belt Boundaries :

NPPF 2018 at [137]:

“ Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.

“ This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

a) makes as much use as possible of suitable brownfield sites and underutilised land;

b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and

c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground. Considerations when drawing up or reviewing GB boundaries.

January 2018

**Attachments Included:**

[http://www.bathnes.gov.uk/sites/default/files/webform/keynsham\\_appeal\\_decision.pdf](http://www.bathnes.gov.uk/sites/default/files/webform/keynsham_appeal_decision.pdf)

[http://www.bathnes.gov.uk/sites/default/files/webform/keynsham\\_subs\\_final.docx](http://www.bathnes.gov.uk/sites/default/files/webform/keynsham_subs_final.docx)

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**Representations received online:**

**Respondent**

<b>Company</b>	Sleep Lane Smiles
<b>Name</b>	Mrs Alyson Lampard dentist
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH1 - Strategic Planning Framework
<b>Comment</b>
<p>This is not a sustainable location for such large scale of housing . All of it is on Greenbelt adversely affecting biodiversity and ecology - The NPPF states that Greenbelt should only be removed if all other sites have been considered . While Whitchurch is geographically nearest to Bristol , there is only one choked up road to get you into the city . There is very little employment . Already commuter chaos. The proposed orbital road is entirely flawed - how can you consider taking a major link road through a large residential housing area right past an expanding primary school with 3 form entry . This road is currently 20mph</p>

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**Representations received online:**

**Respondent**

<b>Company</b>	Stockwood Vale Golf Club
<b>Name</b>	Mr Michael Ramsay Owner and Director
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
<p>I have attached a plan of South East Bristol showing the area between Whitchurch, Stockwood and Keynsham. On the plan I have marked the approximate line of the proposed A4 to A37 Link Road (Bristol Ring Road extension) as well as Stockwood Vale Golf Club which I have outlined in red and have also hatched in red. I have two comments which I believe must be taken into account when planning the Link Road: Firstly I have marked an "X" on Stockwood Lane approximately where the Link Road will cross it. There must be provision for a roundabout near or at Point "X" so that the golf club's customers' cars and delivery lorries can access Stockwood Vale Golf Club. If there were no roundabout near or at Point "X" Stockwood Vale Golf Club (and other properties and businesses) to the East of the Link Road on Stockwood Lane would only be able to access via Stockwood Hill which is extremely narrow, very steep and also has a size/weight restriction. The golf club has multiple articulated and non-articulated lorry deliveries on a daily basis for everything from aggregates, beer deliveries, food deliveries, golf shop deliveries and miscellaneous items. Secondly, a safety area must be maintained between the edge of Stockwood Vale Golf Club and the proposed A4 to A37 Link Road to prevent golf balls landing on the proposed carriageway. I would recommend a safety margin in excess 375 metres. If the safety distance cant be maintained then high fencing must be erected to protect the carriageway at that point.</p>

**Attachments Included:**

[http://www.bathnes.gov.uk/sites/default/files/webform/local\\_plan\\_stockwood\\_vale\\_golf\\_club.pdf](http://www.bathnes.gov.uk/sites/default/files/webform/local_plan_stockwood_vale_golf_club.pdf)

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**Representations received online:**

**Respondent**

<b>Company</b>	Stokes Morgan Planning Ltd
<b>Name</b>	Mr Kevin Morley Principal Planning Consultant
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 5 - Keynsham and North Keynsham Strategic Development Location (SDL)KSM3 - North Keynsham SDL Garden City Principles
<b>Comment</b>
<p>I represent the owners of a 1.12 hectare site on the north side of World's End Lane (see attached site location plan). The owners support the general approach to the North Keynsham Strategic Development Location, in terms of KSM1, KSM2 and KSM3. Diagram 24 - Emerging Revised Strategic Planning Framework, currently includes my clients' site as potential new housing, presumably with the upgrading of World's End Lane - my clients support this approach and suggest the site would be available immediately/within the short term for redevelopment.</p> <p>Note: Online comments are not allowing the attachment of documents. Therefore, please note that the site is located at E:367296 / N:168063 (ST 67299 68055).</p>

**Attachments Included:**

[http://www.bathnes.gov.uk/sites/default/files/webform/site\\_location.pdf](http://www.bathnes.gov.uk/sites/default/files/webform/site_location.pdf)

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**Representations received online:**

**Respondent**

<b>Company</b>	Temple Cloud with Cameley Parish Council
<b>Name</b>	Mrs Jenny Howell Clerk and Responsible Financial Officer to Temple Cloud with Cameley Parish Council
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>	CHAPTER 3 - Spatial Strategy including the rural areasSS2 - More dispersed approach avoiding the Green Belt
<b>Comment</b>	<p>BANES NEW LOCAL PLAN OPTIONS AND PUBLIC CONSULTATION</p> <p>At the December meeting of the Parish Council which took place on Wednesday 12th December 2019 members discussed the drop in event held at Temple Cloud Village Hall on 5th December 2018 (this took place at the request of the Parish Council).</p> <p>The purpose of the drop in event was to enable residents to find out more about the options being consulted upon in the BANES New Local Plan Options document. One of the three options set out in the BANES report (SS2 - Option 2) include further potential residential development at Temple Cloud and Clutton (broad locations are outlined in the maps within the document).</p> <p>It was reported that the event was well attended by residents. The District Councillor added that residents were engaged with the process. The Chairman thanked BANES Council for putting on the event at short notice and also to the many residents who attended the event over the course of the afternoon. Members discussed the feedback provided by residents attending the event. The Parish Council formed broad agreement that residents seemed to oppose option 2 (oppose more large scale development in the parish).</p> <p>As a result of the drop in event and discussion at the December Meeting, it was resolved that the Parish Council do not support large scale housing development in the parish for the same reasons outlined in the Parish Council response to the HELAA.</p> <p>The Parish Council's HELAA site suitability has been uploaded to support this submission.</p>

**Attachments Included:**

[http://www.bathnes.gov.uk/sites/default/files/webform/helaa\\_site\\_suitability\\_temple\\_cloud\\_with\\_cameley\\_pc.pdf](http://www.bathnes.gov.uk/sites/default/files/webform/helaa_site_suitability_temple_cloud_with_cameley_pc.pdf)

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**Representations received online:**

**Respondent**

<b>Company</b>	The Canal & River Trust
<b>Name</b>	Mrs Jane Hennell Area Planner
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 5 - Keynsham and North Keynsham Strategic Development Location (SDL)KSM6 - Potential marina locations
<b>Comment</b>
<p>We are the charity who look after and bring to life 2000 miles of canals &amp; rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a statutory consultee in the Development Management process.</p> <p>Our waterways, including the adjacent towpaths, provide important areas for recreation, biodiversity, sustainable transport (with a related air quality benefit), business, tourism, a focal point for cultural activities and, increasingly in some areas, a space where people are choosing to live. They can also provide a resource that can be used to heat and cool buildings, a corridor in which new utilities infrastructure can be installed, a way of sustainably draining surface water away from new developments and providing non-potable water.</p> <p>We noted the proposal for a Strategic Development Location at North Keynsham, which includes a new mixed tenure marina and our off line moorings, which is covered by policy 7.1 of the West of England Plan and KSM6 of this options document.</p> <p>The Trust worked closely with Bath &amp; North East Somerset Council on the preparation of the Water Space Study for the area an this recognises the potential for new moorings at Keynsham. This document identifies marina locations and typologies (i.e. smaller off-line basins for residential users or larger marinas with fixed bays for leisure users) in Diagram 31 and puts them forward as options to be considered in order to create new and improved moorings.</p> <p>The Trust, through the Water Space Study, has recognised some of the potential benefits of a marina at North Keynsham and has no 'in principle' objection to a reference to it being included in the emerging Bath and North East Somerset plan or the Joint spatial strategy.</p> <p>However, it is important that any such development follows a proper assessment of the impacts of the proposal. A proposal for the development of a marina in this area was dismissed at appeal (APP/F0114/W/16/3142676) in February 2017. The Canal &amp; River Trust commented on this proposal during Bath &amp; NE Somerset Council's consultations on the application (our reference BWYS-PLAN-</p>

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2014-14731, for example).

This led to the preparation of a Water Resources Study to consider the impacts of additional boat movements on water resources on the Kennet & Avon Canal. Whilst this showed that there would be no adverse impact, the assessment is time-sensitive and proposal-specific. As such, the situation could be different if a new application comes forward for a marina as part of the North Keynsham development.

The Trust has previously suggested that the requirement to ensure the protection and enhancement of the natural environment and use of a catchment based approach to water management in masterplanning, and in relation to this site, the Trust's view is that it would be beneficial to make it clear in the policy or supporting text that the acceptability of a development of a marina or moorings at this site will be considered following an assessment of its environmental impacts, including water resources as highlighted in the Waterspace Strategy.

**Attachments Included:**

[http://www.bathnes.gov.uk/sites/default/files/webform/west\\_of\\_england\\_technical\\_evidence\\_work\\_consultation.pdf](http://www.bathnes.gov.uk/sites/default/files/webform/west_of_england_technical_evidence_work_consultation.pdf)

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	The Canal & River Trust
<b>Name</b>	Mrs Jane Hennell Area Planner
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 8 - Development Management policiesDM18 Other comments on Chapter 9
<b>Comment</b>
The Canal & River Trust support the proposed minor amendment will be proposed to Policy D8 to reflect guidance in the "WaterSpace Design Guidance - Protecting bats in waterside development (June 2018)".



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	The Canal & River Trust
<b>Name</b>	Mrs Jane Hennell Area Planner
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 8 - Development Management policiesDM18 Other comments on Chapter 9
<b>Comment</b>
<p>Please note these comments relate to Chapter 8.</p> <p>Green Infrastructure</p> <p>We note the proposal to combine policies CP7 and NE1 and that a Green Infrastructure Plan for the West of England area will be produced. We suggest that the Kennet &amp; Avon Canal and River Avon should be seen as important parts of this. We also wish to ensure that the canal and river corridor is recognised in its widest, multi functional sense and that the combining of the two policies does not result in a too great an emphasis on the environment to the did-benefit of all of the other functions of a GI network such as sport and recreation and a sustainable transport route network. Perhaps cross referring the Waterspace strategy may be of help.</p> <p>Policies H6 moorings and RCR7</p> <p>The Trust largely supports these policies and we note that no amendments are currently proposed. If as the plan progresses, this alters please discuss any proposed changes to either policy or text with the Trust at the earliest opportunity.</p> <p>ST2</p> <p>We welcome this change and note that other key routes such as Kennet &amp; Canal towpath and Bath River Line are also likely to be safeguarded under this policy.</p> <p>Further information on the Canal &amp; River Trust's involvement in the plan making process can be found here. <a href="https://canalrivertrust.org.uk/specialist-teams/planning-and-design/planning-policy">https://canalrivertrust.org.uk/specialist-teams/planning-and-design/planning-policy</a>. We would be happy to meet further to discuss our comments or to talk more generally about how the waterway can help to deliver the Council's sustainable development and wellbeing objectives.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Theatres Trust
<b>Name</b>	Mr Tom Clarke MRTPI National Planning Adviser
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>	
CHAPTER 8 - Development Management policiesDM17 - Management policies	Review of existing Development
<b>Comment</b>	
We support the retention of Policy LCR1 to ensure valued community facilities are safeguarded. We would encourage policy to make clear this applies to cultural facilities for conformity and consistency with the NPPF.	

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Timsbury Parish Council
<b>Name</b>	Mr Chris Gittins Clerk
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS1 - Focussed approach avoiding the Green Belt
<b>Comment</b>
<p>Timsbury Parish Council objects to this Option 1, which allocates a further 200 homes in Timsbury, for the following reasons:</p> <p>Timsbury is not a sustainable location and any potential sites are not deliverable.</p> <p>We have carried out detailed assessments of two new potential sites for B&amp;NES with the conclusion that both would result in damage to the landscape and so against the Local Plan Landscape Policies. Also, the sites would be dependent on car travel due to the decline in bus services. The 179 to Bath and other areas currently has a limited 2-hourly service on Monday to Fridays only and is not viable other than for a limited few residents travelling to work at limited times. Anyone working or needing access to the hospital, Bath shopping or entertainment in evenings or weekends needs a car. It is under review by the bus company and will not be able be subsidised by B&amp;NES after August 2019 due to cuts in its services and budgets. The 768 is a limited service and it is expected to be withdrawn in autumn 2019 when its subsidies end.</p> <p>The 178 to Radstock and Bristol has no service on Sundays which for many is a working day as well. Any attempt at setting up community transport service would not be able to match an adequate integrated bus service.</p> <p>The West of England Transport Strategy includes no plans for improvements in public transport in the Somer Valley / Timsbury area.</p> <p>Cycling in rural areas is not a substantially viable option because it is limited to a small number of very fit younger people due to the distances and risks along winding roads.</p> <p>The link between primary school capacity and local housing cannot be assumed because parents can and do choose schools in other villages due to their travel to work route and/or the perception or reality of the quality of the school which varies over time, not them just being local. Also, there is lack of secondary school transport which is increasingly outside the role and resources of B&amp;NES Council. As a result, schools are more of a generator of traffic in rural areas than in urban areas.</p> <p>The road infrastructure, especially the North Road B3115 through the heart of the village is often highly congested and is the main walking route to the school with limited pavements and many road crossings.</p> <p>Also, both of the two assessed sites are not deliverable as they are not available from the current land owners.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Timsbury Parish Council
<b>Name</b>	Mr Chris Gittins Clerk
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS2 - More dispersed approach avoiding the Green Belt
<b>Comment</b>
<p>Timsbury Parish Council objects to this Option 2 which allocates a further 100 new homes in Timsbury for the following reasons:</p> <p>Timsbury is not a sustainable location and any potential sites are not deliverable.</p> <p>We have carried out detailed assessments of two new potential sites for B&amp;NES with the conclusion that both would result in damage to the landscape and so against the Local Plan Landscape Policies. Also, the sites would be dependent on car travel due to the decline in bus services. The 179 to Bath and other areas currently has a limited 2-hourly service on Monday to Fridays only and is not viable other than for a limited few residents travelling to work at limited times. Anyone working or needing access to the hospital, Bath shopping or entertainment in evenings or weekends needs a car. It is under review by the bus company and will not be able to be subsidised by B&amp;NES after August 2019 due to cuts in its services and budgets. The 768 is a limited service and it is expected to be withdrawn in autumn 2019 when its subsidies end.</p> <p>The 178 to Radstock and Bristol has no service on Sundays which for many is a working day as well. Any attempt at setting up community transport service would not be able to match an adequate integrated bus service.</p> <p>The West of England Transport Strategy includes no plans for improvements in public transport in the Somer Valley / Timsbury area.</p> <p>Cycling in rural areas is not a substantially viable option because it is limited to a small number of very fit younger people due to the distances and risks along winding roads.</p> <p>The link between primary school capacity and local housing cannot be assumed because parents can and do choose schools in other villages due to their travel to work route and/or the perception or reality of the quality of the school which varies over time, not them just being local. Also, there is lack of secondary school transport which is increasingly outside the role and resources of B&amp;NES Council. As a result, schools are more of a generator of traffic in rural areas than in urban areas.</p> <p>The road infrastructure, especially the North Road B3115 through the heart of the village is often highly congested and is the main walking route to the school with limited pavements and many road crossings.</p> <p>Also, both of the two assessed sites are not deliverable as they are not available from the current land owners.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Timsbury Parish Council
<b>Name</b>	Mr Chris Gittins Clerk
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS3 -      Combination of locations outside and within the Green Belt
<b>Comment</b>
Timsbury Parish Council supports this Policy as it is the most deliverable of the 3 Options to provide sites for the extra 700 homes. Timsbury is likely to be able to provide small windfall sites for some homes with under 10 units.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Ubley Parish Council
<b>Name</b>	Dr Phil Collins Vice Chair & Planning Lead
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>	
CHAPTER 3 - Spatial Strategy including the rural areasSS1 - Green Belt	Focussed approach avoiding the
<b>Comment</b>	
<p>Ubley Parish Council supports this option but feels that it is vital that the appropriate infrastructure is committed to, ahead of significant development. It is not enough to suggest infrastructure would come later.</p> <p>The orbital and A37 developments are a must.</p> <p>Also it is important to note that any substantial development in Whitchurch will impact secondary schooling. The current catchment is to Chew Valley School which could not take a large increase in pupil numbers. Thus, if a substantial development in Whitchurch is proposed there needs to be additional secondary education facilities embedded in the committed spending.</p>	

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Unite Students
<b>Name</b>	
<b>Agent (if applicable)</b>	ROK PLANNING Mr Matthew Roe

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
<p>BTH4 sets out 3 options for the location of PBSA and university and academic research space. This includes the restriction on campus only (1); PBSA on campus and university and academic research space in the city, where it does not harm the other objectives of the plan (2); and PBSA and university and academic space on campus and in the city, where it does not harm other objectives of the plan, particularly the delivery of housing and employment (3). We object to options 1 and 2 and are in support of option 3 for the following key reasons.</p> <p>Options 1 and 2</p> <p>The supporting text for these options acknowledges the many benefits of the growing student population in Bath and recognises the need for new student accommodation. However, it also states that this need should mainly be met on campus or through reconfiguration and redevelopment of existing halls of residence. The Council have provided very little justification for this approach aside from stating that applications will be refused and that PBSA does not harm the other objectives of the plan. Furthermore, the options Local Plan acknowledges that the key challenges are to understand the Universities strategies, including growth plans and campus estate plan and that it is essential to balance out competing needs. It is understood that the Council has been working closely with the Universities, but the positions have not been established. Therefore, it is premature to restrict the development of PBSA to campuses on the basis that full capacity and consideration to the expansion of university and academic research space is not fully established further than 5 years. Furthermore, in the emerging development framework within development areas identified, that the Claverton Campus could accommodate between 744 – 930 student beds, however, this does not consider other environmental factors and it is understood that the Council is not supportive of the masterplan as it stands. Therefore, it is not considered that the need for PBSA can be fully accommodated on the campus. It should be considered that the development and expansion and development of the Campuses, particularly Claverton could have environmental impacts which would need to be mitigated against. Therefore, it is important that this is further considered before a policy is advanced to restrict the location of PBSA to campuses only as this would impact on other environmental objectives of the draft Local Plan.</p> <p>Options 1 and 2 would therefore consequently lead to onerous policies which stifle the delivery of PBSA and would consequently not contribute to the delivery of housing as set of in the NPPG. Therefore, it is clear that draft policy options have had consideration to the evidence which confirms</p>

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**Representations received online:**

that there is an increasing student population as confirmed by the SHMA but does not go far enough to explore the University's evidence and whether growth can actually be accommodated here. It should be recognised that many sites outside of the established student locations in Bath are highly sustainable, particularly in terms of access to goods and services and public transport connections. The ability of these sites to deliver student housing must be looked at on a site by site basis as it is possible that some sites will be more appropriate for PBSA than for family sized dwellings. Furthermore, the Local Plan recognises the many benefits the student population brings to the area; however, confining new PBSA to the established student locations will prevent these benefits from being spread out across the city. The concept of inclusive communities is set out in the vision of the issues and options Local Plan, but it is unlikely that such communities can develop if students are essentially segregated from the rest of the population. This policy is highly restricted geographically for no sound planning reason.

Recommendation: Options 1 and 2 should be removed until the capacity and Universities plans are fully established. Whilst the Council's position is clear to direct new PBSA to Campus locations, option 3 should be established in the draft Local Plan which enables the delivery of PBSA in the city. This policy requirement would bring further benefits and relive pressure on HMOs.

#### Option 3

We strongly support policy option 3 which supports PBSA in the city, however, make representations to the wording of option 3 which states that PBSA can be located on campus or within the city where it does not harm the other objectives of the Plan, particularly the delivery of housing & employment. This requirement of the policy option is strongly objected to as the position has been made clear by the NPPG. The delivery of PBSA can be counted toward the supply of conventional housing and does not result in the loss of existing self-contained residential accommodation. In addition to this national and strategic policy position, there have been a series of appeal decisions where Inspectors have granted consent for student development where issues have been raised by the local planning authority in terms of the perceived conflict with the development plan due to the view that the site should deliver conventional housing. The appeal decisions include the following and are appended as follows:

- a) 315-349 Mill Road, Cambridge (APP/Q0505/W/15/3035861) (Enclosed in Appendix A);
- b) Land at Fish Strand Hill, Falmouth, Cornwall (APP/D0840/W/17/3177902) (Enclosed in Appendix B); and
- c) Land at Ocean Bowl, Falmouth, Cornwall (APP/D0840/W/17/3182360) (Enclosed in Appendix C).

Recommendation: the thrust of policy option 3 is strongly supported, however, the following wording should be removed "only allow such development in the city and elsewhere where it does not harm the other objectives of the Plan, particularly the delivery of housing & employment", as it has been demonstrated that PBSA does not compromise the delivery of conventional housing and this assumption is contrary to the NPPG.

#### Nominations Agreements

We object to the supporting draft policy text to the options which states that a nominations agreement needs to be in place prior to the grant of planning permission. We acknowledge the policy requirement which seeks to secure the accommodation through planning agreement or condition for long-term student use and be secured by nomination agreement for occupation by students of one or more identified Higher Education provider. However, the policy as amended could prohibit PBSA



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**Representations received online:**

developments coming forward. This imposes a further requirement which states that unless the accommodation is secured by a specified University through a binding legal agreement, the development will not be supported.

Unite do not support this approach as this type of binding connection with a specified provider at such an early stage in the planning process is extremely restrictive and does not coincide with the manner in which Unite operate which is to generate demand through students letting directly. Additionally, Unite have found that Universities are often reluctant to engage in such agreements where they are liable to pay void payments if they are unable to fill rooms or take a risk on losing a development (and therefore committed rooms) if it falls behind in the planning and / or construction process, which as articulated earlier can take between 4 – 5 years. The removal of this restriction will afford the applicant a greater degree of flexibility and enable rather than hinder the delivery of high-quality student accommodation schemes which is essential to addressing the student accommodation.

Recommendation: This policy requirement should be relaxed as it is not possible to have a nominations agreement in place and secured for the lifetime of the accommodation prior to the grant of planning permission.

**Attachments Included:**

[http://www.bathnes.gov.uk/sites/default/files/webform/190106\\_-\\_r00027\\_final\\_unite\\_representations\\_to\\_banes\\_draft\\_local\\_plan.pdf](http://www.bathnes.gov.uk/sites/default/files/webform/190106_-_r00027_final_unite_representations_to_banes_draft_local_plan.pdf)

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Unite Students
<b>Name</b>	C/O Agent
<b>Agent (if applicable)</b>	ROK Planning Mr Matthew Roe

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
<p>Unite are concerned that the proposed affordable rent requirement for student accommodation is too high and will ultimately hinder the future delivery of good quality student schemes. Affordable rent cannot be considered in isolation and must be considered alongside the introduction of CIL which collectively amount to significant additional development costs and will continue to have a dramatic adverse impact on the supply of student accommodation in the City. Whilst we note the rental level differs to London Boroughs, we have used examples here to demonstrate our representations to the percentage requirement as dictated by the policy option.</p> <p>The introduction of this will ultimately deter the delivery of student schemes and consequently place additional pressure on the supply of other conventional forms of housing. Unite, amongst other student housing providers are concerned that additional barriers will further slow-down the delivery and result in unintended consequences comprising:</p> <ul style="list-style-type: none"> <li>• A reduction in the supply of purpose-built student accommodation;</li> <li>• A reduction in the supply of affordable rent;</li> <li>• Lack of supply of student housing not being able to address the increased demand and thus existing rents increasing; and</li> <li>• An increase in students using the HMO/general needs housing market and thus reducing the supply of conventional housing.</li> </ul> <p>With supply being reduced, market forces will dictate the rents of the limited supply of purpose-built student accommodation and will inevitably become more expensive. Additionally, if the 35% affordable rent requirement is strictly enforced it is highly likely that accommodation providers will increase the rent levels on the remaining 65% to mitigate the financial impact on viability. As such, the practicality of the implementation of this policy and the principle is ultimately flawed and should be left to the free market.</p> <p>This proposed policy option is not only counterproductive to the policy of delivering affordable student accommodation but also to overall housing requirement given the positive contribution PBSA can make to the release of other conventional forms of housing. Constrained supply will mean higher rents which will inevitably undermine the Local Plan's aim to increase affordable student accommodation.</p>

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There are a number of schemes in London Boroughs that have not provided student accommodation in strict accordance with this policy requirement as it would render developments unviable. These examples as used, given that this draft policy option is following the London Plan's introduction of affordable rent. From the research, we note at least 6 examples including:

1. Site at Junction of western Avenue and Old Oak Road (LB Hammersmith and Fulham) The development proposed 306 student rooms across a part 6/7 storey building and planning permission was granted on 19 October 2016. The scheme was not referable to the GLA neither was an affordable rent contribution sought;
2. Holbrook House, Victoria (LB Ealing) Redevelopment of the site to construct a part 16/18 storey building comprising 424 bed spaces and commercial units for flexible use. Planning permission was granted on 14 February 2017 accepting the provision of 10% affordable units with a discount of at least 20% on the full rent. The affordable rent quantum is based on the conclusions of viability testing by the applicant;
3. Emperor House, 35 Vine Street (City of London) The redevelopment of the site to provide a mixed-use building, including 619 student bedspaces was recommended for approval at Committee on 25 July 2017 and is currently awaiting determination. The proposal did not provide a contribution to affordable rent;
4. 140 Wales Farm Road, Acton (LB Ealing) The redevelopment of the site proposed 5 buildings up to 31 storeys in height comprising 736 student bedspaces, residential flats and commercial floorspace. The application was approved at Committee on 16 August 2017 despite no contribution to affordable housing, but the applicant demonstrated the development would provide University accommodation to meet the needs of Imperial College;
5. 4-10 Forest Road (LB Waltham Forest) Planning permission was granted at Committee on 12 October 2017 for the construction of a 9 to 17 storey student accommodation block to provide 353 student rooms and 900 sqm of commercial floorspace. The proposal did not provide a contribution to affordable rent as it was demonstrated this was unviable; and
6. Parkwood House (LB of Brent) The planning application was recommended for approval at planning committee on 13 December 2017. The proposed development comprises the erection of a part 13 and 17 storey building to provide 283 student bedrooms. The applicant did not demonstrate a connection with a higher education provider, however, it has been agreed that this will be sought through a clause in a Section 106 Agreement. In the event this is not achieved, a viability review mechanism will be implemented to secure affordable student accommodation.

Recommendation: We therefore propose that this policy option is reduced from 35% to 10% of the accommodation is secured as affordable student accommodation. We also recommend that additional wording that if student accommodation schemes are able to demonstrate a connection with a higher education provider that this does not apply, and an affordable rent contribution will not be sought.

**Attachments Included:**

[http://www.bathnes.gov.uk/sites/default/files/webform/190106\\_-\\_r00027\\_final\\_unite\\_representations\\_to\\_banes\\_draft\\_local\\_plan\\_0.pdf](http://www.bathnes.gov.uk/sites/default/files/webform/190106_-_r00027_final_unite_representations_to_banes_draft_local_plan_0.pdf)

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Unite Students
<b>Name</b>	C/O Agent
<b>Agent (if applicable)</b>	ROK Planning Mr Matthew Roe

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
<p>We are supportive of the introduction of this policy option as it acknowledges a further housing tenure and follows the thrust of London Boroughs. However, at this early stage of consultation it is understood that the Council are still determining a criterion to determine these types of developments, therefore no specific representations are made.</p> <p>Recommendation: That the wording of this policy is drafted to follow the requirements as included in the draft London Plan (H18).</p>

**Attachments Included:**

[http://www.bathnes.gov.uk/sites/default/files/webform/190106\\_-\\_r00027\\_final\\_unite\\_representations\\_to\\_banes\\_draft\\_local\\_plan\\_1.pdf](http://www.bathnes.gov.uk/sites/default/files/webform/190106_-_r00027_final_unite_representations_to_banes_draft_local_plan_1.pdf)

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Unite Students
<b>Name</b>	C/O Agent
<b>Agent (if applicable)</b>	ROK Planning Mr Matthew Roe

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
<p>It is clear that the University is expanding and without sufficient dedicated student accommodation which may hinder the Universities growth, and in turn the contribution the Universities and their student population contributes to the local economy. It is fundamental that the growth of these HEI institutions is supported given the Council's strategic outreach and contribution to the local economy that PBSA makes. Though Unite understands that the delivery of student housing needs to be managed in accordance with strategic need and local priorities; we recommend that further work needs to be undertaken on the Universities masterplan to fully establish the capacity of existing campuses to deliver additional PBSA given the clear environmental constraints. In addition, there is interrelation between the policy options on the location for new PBSA and unknown capacity at the Campus and further evidence should be provided to ensure that the draft policies do not ultimately stifle the delivery of PBSA. Furthermore, as set out earlier in these representations there should not be a presumption against PBSA in other city locations given the benefits that it can bring including optimising sustainable brownfield location. Overall, the Council needs to demonstrate greater flexibility in its ability to be pragmatic towards projected increases in student numbers.</p>

**Attachments Included:**

[http://www.bathnes.gov.uk/sites/default/files/webform/190106\\_-\\_r00027\\_final\\_unite\\_representations\\_to\\_banes\\_draft\\_local\\_plan\\_2.pdf](http://www.bathnes.gov.uk/sites/default/files/webform/190106_-_r00027_final_unite_representations_to_banes_draft_local_plan_2.pdf)

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	West Harptree Parish Council
<b>Name</b>	Mrs Janet Burdge Parish Clerk
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS5 - Other comments on Chapter 3
<b>Comment</b>
<p>DM14 Policy Options for Residential Parking Standards:</p> <ol style="list-style-type: none"> <li>1. District-wide differentiation <ol style="list-style-type: none"> <li>a. We assume that there is a typographic error in Policy Option DM14 and the second option for district-wide differentiation should have read, "Continue with the current standard maximum parking standards in Bath city centre and uniform minimum parking standards elsewhere in B&amp;NES".</li> <li>b. We strongly support Option 1 (Develop and define parking standards differentiated spatially in broad areas or zones across the District reflecting key accessibility characteristics). This because the current two-zone approach (i.e. Policies for "Bath city centre" and "elsewhere") is clearly inadequate and fails to reflect the broad diversity of accessibility characteristics. The lower density of housing in rural areas means that; <ol style="list-style-type: none"> <li>i. Public transport is not a practical and available alternative</li> <li>ii. It is generally impractical to rely on on-street parking</li> <li>iii. Car club schemes are unlikely to be sustainable</li> </ol> </li> </ol> </li> <li>2. Garages <ol style="list-style-type: none"> <li>a. We strongly support Option 2 (Exclude garages from the residential parking standard)</li> <li>b. It is a fact of modern life that garages are increasingly being used simply as covered storage and while the Authority may have some ability to regulate misuse of a driveway where this limits parking, it is impossible to prevent use of a garage for storage.</li> </ol> </li> <li>3. On-street Parking &amp; Highway Design &amp; Car Club Spaces <ol style="list-style-type: none"> <li>a. We are nervous that such policies, which are indeed appropriate in an urban context, are also imposed and enforced on rural areas without recognising the very different access characteristics. We therefore encourage care and caution in the development of new transport policies.</li> </ol> </li> </ol>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	West Harptree Parish Council
<b>Name</b>	Mrs Janet Burdge Parish Clerk
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS5 - Other comments on Chapter 3
<b>Comment</b>
<p>DM15 Options for defining Parking Standards:</p> <p>1. Especially given our response to DM14 above and the need to reflect the diversity of key accessibility characteristics evident across the District, we prefer the approach of Option 2, however we would modify this slightly (i.e. “Local Plan policy to refer to parking being provided in accordance with the standard defined in a SPD or a standard defined in a made Neighbourhood Plan”). Our rationale is that a made Neighbourhood Plan has by definition passed the scrutiny of the Planning Inspector and in so doing has demonstrated that special circumstances exist. It is not therefore required to demonstrate consistency with nor should it be overruled by an overall parking strategy.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	West of England Combined Authority (WECA)
<b>Name</b>	Celia Davis Planning Research Officer
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
Any other comments
<b>Comment</b>
<p>The West of England Combined Authority (WECA) are working with the four West of England Unitary Authorities to deliver the Joint Spatial Plan (JSP).</p> <p>WECA support the strategic approach to development outlined in the B&amp;NES Local Plan 2016-2036 Options Consultation. The strategy outlined by B&amp;NES will enable the delivery of the housing, employment and infrastructure needs and meet the strategic priorities of the region as outlined in the JSP.</p> <p>WECA support the proposed policy approach for the delivery of North Keynsham and Whitchurch strategic development locations. These locations have been identified in the JSP to meet the housing and employment needs and associated transport infrastructure of the region. This includes the provision of high quality and sustainable places in line with the place shaping principles set out in Policy 5 of the JSP publication document.</p> <p>WECA will continue to work strategically with B&amp;NES and the WoE UAs to support delivery of the JSP as articulated through the development of Local Plans.</p>



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Company</b>	Whitchurch Village Council
<b>Name</b>	Mr J Medlin
<b>Agent (if applicable)</b>	Mr Jon Medlin

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)
<b>Comment</b>

**Respondent**

<b>Company</b>	Whitchurch Village Council
<b>Name</b>	Mr J Medlin
<b>Agent (if applicable)</b>	Mr Jon Medlin

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH1 - Strategic Planning Framework
<b>Comment</b>
<p>Please find enclosed an objection to the B&amp;NES Local Plan on behalf of Whitchurch Village Council (WVC). WVC has responsibility for the whole parish of Whitchurch, and plays a vital role in acting on behalf of the community it represents. The Council has a wide range of powers and responsibilities including:</p> <ul style="list-style-type: none"> <li>• Administration of open spaces, play areas, bus shelters, cemeteries, allotments.</li> <li>• Assessment of planning applications and other proposals which may affect the parish</li> <li>• Undertaking projects and schemes that benefit local residents</li> <li>• Helping other tiers of local government keep in touch with their local communities</li> </ul> <p>The objection to the allocation of a strategic development location within Chapter 6 of the Local Plan. It is an objection to the principle of further development which will harm the character and setting of the village and is based on 6 detailed matters. These, individually and cumulatively demonstrate that the proposal is not sound for proceeding with the allocations.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

The Plan which many people would wish to support, should be a Plan which analysed the strengths and weaknesses of its communities and the problems faced by them, and then sought to develop the strengths, and address the problems and weaknesses, with judicious and well thought proposals for carefully planned new development which would improve the environment and quality of life for existing residents, as well as providing a pleasant and pleasurable location for newcomers.

The present Plan does none of those things. It has not been prepared for and with its communities, and contains no over-arching vision. It provides merely a response to Government requirements to produce an up-to-date Plan and to allocate land for new housing. Evidence has been prepared with a lack of clear vision, which means that it does not add the real value which could have been found by embracing and involving the area's diverse communities.

Yours faithfully,  
Whitchurch Village Council

**Attachments Included:**

[http://www.bathnes.gov.uk/sites/default/files/webform/whitchurch\\_village\\_council\\_objection\\_to\\_banes\\_local\\_plan\\_consultation\\_nov\\_2018-jan\\_2019\\_final.pdf](http://www.bathnes.gov.uk/sites/default/files/webform/whitchurch_village_council_objection_to_banes_local_plan_consultation_nov_2018-jan_2019_final.pdf)

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Darren Andrews
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
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CHAPTER 3 - Spatial Strategy including the rural areasSS2 - More dispersed approach avoiding the Green Belt

<b>Comment</b>
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The text in this section is misleading it states ...  
 "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."  
 Yet on Diagram 5 for temple cloud and clutton it states a potential figure of 200 homes.  
 But in another diagram it is a lot less with 50 homes for temple cloud and surrounding villages.  
 Both Bishop Sutton, Temple cloud and clutton have already had significant housing developments over past few years. Logically why should we get more homes proposed in a small village compared to midsomer norton getting 100 less (100 in Total) Why should two small villages get the same amount of development proposed as large sites ? Logically and infrastructure wise that proposal simply does not stack up to increase a small village with further larger housing developments.  
 Certainly for Temple Cloud which this village has already seen substantial growth and redevelopment into fields previously used by local residents for recreation.  
 Temple Cloud School has not been redeveloped and nor have other infrastructure type items to cope with an influx of new residents.  
 I often have to travel to West harptree surgery as Cameley surgery is already full. It is extremely difficult to get a same day appointment unless an "emergency".  
 Temple Cloud has been identified as having poor air quality. The plan states this "Cumulative effects in developing sites may unacceptably increase traffic levels on the A37 with a resultant impact on air quality" So why is there even a proposal to develop further housing which will then lower the air quality further and lead residents into a poorer quality of health. We already have levels similar to central london.  
  
 Traffic on the A37 is extremely busy already, not helped by the fact our residents can no longer get to Bath on a regular basis by public transport.  
  
 Pulling out in vehicle onto the A37 from a side road is getting extremely difficult and dangerous without an influx of new homes adding additional transport. The A37 is a deadly road as proved by the money spent to improve and reduce deaths on a small stretch of road.  
  
 I personally feel we need to restrict any further development in temple cloud and surrounding small villages. Can there not be a concentration on Brown field sites in the cities for workers, or where there are good transport service for workers.  
  
 Increasing traffic on the A37 will add additional danger to residents. Trying to walk down to the

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**Representations received online:**

surgery or cross the road to walk down to the book barn is like taking your own life in your hands. I saw an emergency services vehicle at a stand still last week due to two lorries blocking each end of the road. The pavements are thin in temple cloud and large lorries speed into our village with little regard to those people trying to enjoy all the hard work done by temple cloud in boom residents.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Angela Baber
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
<p>I STRONGLY OBJECT TO THE PLANS. Please register my objections.</p> <p>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.</p> <p>If this goes ahead, the increased traffic will spew into Whitchurch Lane.</p> <p>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.</p> <p>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.</p> <p>â€¢ 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.</p> <p>â€¢ There are NO shops in the village. Again more car use.</p> <p>â€¢ There is no senior school within walking distance</p> <p>â€¢ No additional doctors surgeries planned. BANES residents are already using Stockwood and Whitchurch Health Centres. These GPâ€™s are not coping with the patients that they have already, getting an appointment is already quite difficult!</p> <p>â€¢ 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.</p> <p>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.</p> <p>Please keep me updated with situation.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Caroline Bannister
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
<p>The proposal to extend the South Bristol ring road through green belt is ill conceived. The to proposed routes serve no apparent purpose as they simply carve through green belt and spew the traffic onto Whitchurch Lane, already a well used route with no ability to expand. One route option even comes out adjacent to a primary school!</p> <p>The council is pushing a housing plan onto the local residents of Bristol with little regard for the local community residents.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Catherine Bartlett
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
<p>To all those this may concern,</p> <p>I STRONGLY OBJECT TO THE PLANS IN THE JTP. Please register my objections.</p> <p>I write to you as a resident who lives on Bifield Road, Stockwood, Bristol and I will be significantly affected by both the JSP and JTP.</p> <p>The communication from Bristol City Council regarding information on the JSP and JTP for its residents has been shambolic and far too little too late to allow for informed and considered feedback to be given. In the very first instance the consultation period must be extended with all councils able to demonstrate how they have correctly and legitimately sought public opinion on the plans.</p> <p>The orbital route will run directly behind my house and will destroy greenbelt land that I know is home to wild deer, barn owls and tawny owls (if not others) bats as well as an array of other wildlife. As there is a water way that runs through Stockwood Vale and Queen Charlton I would hope that checks have been done to determine what other potentially rare and protected species may be living here and would want to see evidence of this.</p> <p>I am mostly angered by the fact the public were asked to consult on the JSP housing plans a year ago when these plans are allegedly based on the correct infer-structure being in place first. If this is the case why are the housing plans being pushed through before the JTP has been agreed? If the roads aren't there the houses should not even be being considered however the delivery of the JTP suggests that the houses are already a "done deal" and this is neither true or fair to suggest to the public!!</p> <p>The Whitchurch area could not currently accommodate anywhere near the number of houses proposed and the proposed roads would simply then allow even more homes to be built on then surrounding "grey belt". I am aware developers have already submitted plans to build on the remaining horseword land and this, along with the orbital link road, will forever change the landscape of an area of outstanding beauty which is Stockwood Vale and Queen Charlton.</p> <p>To suggest this road would not impact on air/noise pollution is ridiculous. I would like to see evidence of how carbon monoxide levels would increase? The A37 will still have the same level of traffic as it is the main route from Wells to Bristol City Centre and none of the routes proposed in the JTP will have enough impact upon this to justify it being built.</p>

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**Representations received online:**

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, an already highly congested area at peak times.

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 traffic calming measures were put in has NOT gone away and are therefore still very much needed. Whitchurch Lane is a residential area with houses on both sides.

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 Whitchurch or the in which I live, Stockwood, despite the orbital route running directly along Stockwoods boundary.

â€¢ 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.

â€¢ There are NO shops in Whitchurch village. Again more car use.

â€¢ 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!

â€¢ 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.

I understand Scotland Lane would be closed to traffic and this is currently in the process of having tens of thousands of pounds of work to improve it. How is this financially viable? I also understand the park and ride will move and become smaller therefore meaning greater car use to get the P&R from Stockwood or indeed in to Bristol if there is not the spaces available to park!

We need improvements to existing infrastructure and should not be wasting money on new roads for houses that don't even exist and HAVE NOT BEEN AGREED!!! How can this be lawful??

Villages and communities will be changed forever and there is not the evidence within the JTP to demonstrate why these proposed roads are in anyway justified for the communities that do exist already!!

Please provide answers to my questions and keep me updated with situation.

Kind regards,

Catherine Bartlett



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Andrew Battle
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS2 - More dispersed approach avoiding the Green Belt
<b>Comment</b>
<p>Having read your Local Plan and proposals, I would like to take this opportunity of indicating why it is my belief that the Temple Cloud/ Clutton suggested extra development ( SS2 Option 2) should be disregarded as a viable option for further consideration:</p> <ol style="list-style-type: none"> <li>1. Temple Cloud is a village which has already seen substantial growth and development in recent months.</li> <li>2. These green fields were previously enjoyed and used by local residents for recreation, in fact our only facilities for maintaining wellbeing in an area without provided facilities.</li> <li>3. Temple Cloud School has not been redeveloped and nor has any infrastructure been provided to cope with the influx of additional residents.</li> <li>4. Cameley surgery cannot cope with the current demand for local patients. There will need to be additional Health facilities provided for any additional inhabitants in the area.</li> <li>5. Temple Cloud has been identified as having poor air quality. In fact it has been compared to levels in central London! The plan states this “Cumulative effects in developing sites may unacceptably increase traffic levels on the A37 with a resultant impact on air quality”. To even consider a proposal to develop further housing which will then lower the air quality further and increase the likelihood of a poorer quality of health for residents would seem ludicrous! We are still awaiting proposals to decrease this situation.</li> <li>6. The volume of traffic currently using the A37 has increased tremendously, making it extremely busy already. Additional homes and therefore traffic would only add to the mayhem.</li> <li>7. There are several Brown Field sites around in BANES that should be considered for redevelopment first, before more Green fields are lost to development. The factory site at Welton, which has been empty for many years now, or the Old Fullers Earth Works at Odd Down, near to the Park &amp; Ride, for instance.</li> </ol> <p>.</p> <p>I trust that these few issues are taken into account and seriously considered with regards to the SS2 option before any further action is taken.</p> <p>Thankyou</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Miss Alison Bennett
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
Any other comments
<b>Comment</b>
<p>To Whom it may concern</p> <p>I STRONGLY OBJECT TO THE PLANS. Please register my objections.</p> <p>I write to you as a resident who lives within Bristol City Council but will be affected by the BANES/Bristol City Council decisions..</p> <p>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.</p> <p>If this goes ahead, the increased traffic will spew into Whitchurch Lane.</p> <p>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.</p> <p>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.</p> <p>• 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.</p> <p>• There are NO shops in the village. Again more car use.</p> <p>• There is no senior school within walking distance</p> <p>• No additional doctors surgeries planned. BANES residents are already using Stockwood and Whitchurch Health Centres. These GPs are not coping with the patients that they have already, getting an appointment is already quite difficult!</p> <p>• 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.</p> <p>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.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

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**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Martyn Berryman
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH1 - Strategic Planning Framework
<b>Comment</b>
<p>Hi</p> <p>I STRONGLY OBJECT TO THESE PLANS.</p> <p>Please register my objections.</p> <p>I write to you as a resident who lives within Bristol City Council but will be affected by the BANES/Bristol City Council decisions..</p> <p>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.</p> <p>This will cause so much traffic congestion just trying to cross this road will be almost impossible. This road would eventually become a link from the M4 to Bristol Airport bringing with it traffic pollution, congestion, and part of the route will pass a primary school which has a 20MPH speed restriction.</p> <p>Whitchurch is a working class area and not suitable to receive all this additional traffic from the new road that BANES would like to install and have absolutely no benefits for the people that live in this area.</p> <p>Regards</p> <p>Martyn Berryman</p> <p>Please keep me informed and updated of all whats going on with this proposal.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Graham Billam
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
Any other comments
<b>Comment</b>
We have a Public Consultation By Gladman Land to build on green belt land which should not be granted as their are plenty of Brown Field sites to be used before any Green field Sited and we also have Two very busy School and Academy that are already using our roads as drop off pick up zones and make around us very busy and our Road and many around us Dangerous and the Junction across to Nobsbury lane impossible during school start and finish times and the main Road is already at capacity most day's This needs to be looked at very closely we certainly need road upgrades NOW!! not when we have another 200plus car's When finished building and as for lorries whilst building will be a night-mare Your's faithfully G Billam

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr & Mrs Barrie & Carolyn Bishop
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
<p>I am concerned with the negative impact on the local community with the proposed development of the new orbital link road linking to Whitchurch Lane. Both the proposed routes link to Whitchurch Lane and then run very close to the Bridge Farm Primary School.</p> <p>The proposed BANES housing developments to the South and the Bristol City Council housing developments on Hengrove Park, Hartcliffe Campus, Parkview, Imperial Park and Filwood Park on Hengrove Way (probably 5000+ dwellings-it's hard to be sure as the numbers go up every time an update is released) will have a huge impact on traffic with the new link bringing yet more from the A4. All this traffic will congregate on Whitchurch Lane just yards from Bridge Farm Primary School around which the roads are already extremely busy during the school run. It's clear the proposed link will be extremely busy along Whitchurch Lane and shows little regard for the well-being and safety of local residents, in particular the young children of Bridge Farm Primary. Its also open to debate as to just how effective it will be considering the traffic volumes and the nature of the Whitchurch Lane at the (current) residential end.</p> <p>The proposed link road on its own would be one thing and have huge negative impact on Whitchurch but combined with the housing proposals would be a total nightmare for local residents, school children, noise and air pollution AND commuters alike.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Malcolm Blackmore
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH1 - Strategic Planning Framework
<b>Comment</b>
Although we are not Banes residents the proposed level of house building will have an adverse impact on the locality a vast increase in traffic and pollution on the roads surrounding Whitchurch village ,quality of life in the area will be affected by the proposed new road routes through residential areas on the Bristol side of Whitchurch ie Halfacre lane/ Washing pound lane. The proposed level of house building is far to high.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs S Bond
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>	
CHAPTER 3 - Spatial Strategy including the rural areasSS1 - Green Belt	Focussed approach avoiding the
<b>Comment</b>	
<p>I fiercely oppose destruction of the Green Belt. With the rise of ecological, environmental, and economic implications for rural areas, it is even more vital to protect land from disappearing due to urban creep. RAD26 &amp; RAD25 are green field sites. These have potential to grow crops of the future. In our lifetime, I believe the region will see a renaissance in growing higher value organic crops that will be consumer driven. How short sighted would it be to develop farmland and kill off such potential in the region? I don't believe I am over stating this case. The South West has a world famed Agricultural Heritage based on it's geography. Everything from the region's people, the soil, air, water and critically the wildlife that contribute to maintaining this incredible legacy must not be destroyed.</p>	



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Simon Bond
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS1 - Focussed approach avoiding the Green Belt
<b>Comment</b>
<p>The new Local Plan 2016-2036 is proposing development of RAD26 and RAD25. I want this to be stopped and removed from the Plan for the following reasons:</p> <ol style="list-style-type: none"><li>1. These are green field sites outside of the Housing Development Boundary</li><li>2. Writhlington has already exceeded its quota for new houses in the last 18 months so there should be no further housing until 2029</li><li>3.If this we to go ahead, it would go directly against B&amp;NES' own Green Infrastructure Policy</li><li>4 The road infrastructure is already overloaded and dangerous</li><li>5.1500 children's lives are at risk every day at the A362 junction with Knobsbury Lane and Manor Road</li><li>6. Any building work is inappropriate because there is no likelihood of effective drainage or sewage systems.</li></ol> <p>The proposed development of RAD26 and RAD25 is ludicrous and not a serious solution for B&amp;NES' housing shortage. The Writhlington community is mobilised to stand against these proposals and the Councillors and Officers who are propagating them.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr & Mrs Mike and Ann Bone
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 5 - Keynsham and North Keynsham Strategic Development Location (SDL)KSM11 - Other comments on Chapter 5
<b>Comment</b>
<p>We wish to make a number of general comments concerning roads, traffic and land use.</p> <ol style="list-style-type: none"><li>1. Our main concern is that the proposed expansion of Keynsham will cause serious traffic congestion and increased levels of air pollution if unlimited car ownership is to continue. The recent changes to traffic flow around Keynsham High Street has already resulted in queuing traffic on surrounding roads and diminished air quality for residents.</li><li>2. Re the proposed new road from the A4 to the Keynsham Road A475, if this road connects with Avon Mill Lane there will be serious traffic problems. Current traffic use is causing delays here and the junction poses safety difficulties as there is no traffic signalling here. This will be completely unmanageable if traffic flow from the A4 is added to present usage. This would be avoided if the option involving a new bridge over the River Avon is chosen.</li><li>3. As regards land designated for new housing, under-used brownfield sites should be considered rather than opting for proposed expansion on greenfield sites. In particular, the former Keynsham Railway Goods Yard in Avon Mill Lane is currently only partially used following the closure of the stone yard in early 2018. Very few jobs are provided here and the remaining two businesses that apparently operate here now could easily be relocated. This is a residential area and best suited for domestic housing if additional provision was made to avoid exacerbating current traffic congestion where Avon Mill Lane passes below the railway line - only one stream of traffic can pass through this listed Brunel Bridge at any one time. Use of the former railway goods yard for housing would not only be more appropriate than the current under-utilisation of this industrial space and could accommodate a significant number of houses.</li></ol>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Allan Bratt
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 5 - Keynsham and North Keynsham Strategic Development Location (SDL)KSM11 - Other comments on Chapter 5
<b>Comment</b>
<p>I am very concerned that the proposals for developments in Keynsham and Whitchurch will have a severely detrimental effect on the daily lives of all who live in these communities as well as on the viability of Keynsham as a commercial centre. The proposals for a very large increase in the number of dwellings and therefore population will put an enormous strain on the already overcrowded infrastructure which will not be mitigated, and may well be worsened, by the proposals for changes to the road infrastructure which will at best provide access to the new developments. The proposed development at Keynsham North will itself increase the traffic on the Keynsham to Bitton road and the already overloaded A4 through Saltford.</p> <p>Car parking in Keynsham is already at capacity with onstreet parking becoming a danger and annoyance to all residents, not least those on the new Summerdale estate with commuter and business users leaving their vehicles on the site to the detriment of the quality of life on the estate. Without very significant improvements to the availability of public transport throughout the area these problems will increase significantly as users from the area try to access the meagre services from the town centre and the railway station.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	mrs jill britten
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 5 - Keynsham and North Keynsham Strategic Development Location (SDL)KSM11 - Other comments on Chapter 5
<b>Comment</b>
<p>KSM 11 It would make economic and social sense to place the 2.500 houses proposed for Whitchurch at Hicks Gate, next to the ring road, near the railway station, close to employment. It is uneconomic to place 2.500 houses at Whitchurch where there is no employment, air pollution is already above the National guidelines, and then go to the cost of a road from Whitchurch to Hicks Gate. All of this will be on Green Belt Land. BANES seem in disarray over the PPG's for Green Belt. Clr Gerrish, Keynsham, has written "BANES has a clear policy not to allow housing on the green belt at Hicks Gate" Where is this Policy applied at Whitchurch. The Green Belt entry to Bristol at Whitchurch is all agricultural scenic land. The Green Belt at Hicks Gate is what could be called "Edgelands".</p> <p>WCH12 This SDL is totally unsustainable. Infrastructure already strained, little employment, air pollution already above national guidelines, access to motorway is at least 3/4 hour hence low employment opportunities. Putting a new road in at Whitchurch to access Hicks Gate will just attract more traffic as will the intended "garden community with new school and shops". This is madness. Put the Development at Hicks Gate or Long Ashton where all the needs of a new community can be met. All of this intended development will be on green belt currently under agricultural use and a wonderful entry to a conurbation. It is to be noted that BANES has stated that GB wont be used for housing at Hicks Gate. Why not? Why agree to GB being lost at Whitchurch and not at Hicks Gate?</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	mr David Brooks
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
I oppose the new ring road route through queen charlton lane and horseworld. The original via East dundry is logical.  We wsh to oppose the proposed route in every way.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Andrew Bryant
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 5 - Keynsham and North Keynsham Strategic Development Location (SDL)KSM9 - Avon Valley Adventure and Wildlife Park
<b>Comment</b>
Already new houses being built on Bath rd,keynsham,enough is enough now, no need for further devoplment in this area,main A4,keynsham to saltford is already grid locked,if there is a need for further houses to be provided in the banes area, can you find areas in bath,we are not a dumping ground for the city of bath,or is it not to spoil it's heritage title ?.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Catherine Bryant
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 5 - Keynsham and North Keynsham Strategic Development Location (SDL)KSM9 - Avon Valley Adventure and Wildlife Park
<b>Comment</b>
Not another lot of houses, already the A4 is crazy and yet you wanted more traffic. Have you not got environmental objectives for example car pollution targets. I totally oppose this development.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Dean Bryant
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
The road plan has no thought towards where it is joining with Bristol. Whitchurch Lane and surrounding roads are already congested even before 2000 homes are built on Hengrove Park and surrounding areas which are only a mile in the other direction from this plan.It is the equivalent of building a new section of motorway and ending it on a narrow single lane residential street. The original plan of a road along the Dundry Slopes and now being able to join it with the new link road at Bishopsworth would mean narrow residential roads would not be effected.



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Ian Burden
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 5 - Keynsham and North Keynsham Strategic Development Location (SDL)KSM5 - Pedestrian and Cycle connections
<b>Comment</b>
There remains no link between Stockwood/Whitchurch and Keynsham. This applies to not only traveling there by bus (which means going in towards Bristol and then coming out again) or by walking/cycle path. The only link is Stockwood Lane which is not suitable for pedestrians. This means that Keynsham town centre is not available and cannot benefit from Whitchurch/Stockwood residents. Ideally the council will introduce a link so that Bristol residents can access services in Keynsham by bicycle and on foot.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	mrs paula burge
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
Any other comments
<b>Comment</b>
<p>Development plan for Writhlington.          We have already exceeded the quota for 50 dwellings for 1016 to 2029 and there should be no further development even though about until at least 2029.</p> <p>The road infrastructure around the area is not suitable for the additional amount of traffic that will be needing to use lanes at Church Hill let alone Foxcote Lane/ Knobsbury Lane. These lanes are already overrun with traffic as a short cut to Peasedown St John/Bath.</p> <p>There have been many accidents involving all these road and even more so,when road works are happening they use these lanes as a 'rat' run. The lanes are not suitable for lots of heavy traffic which will indifferently increase if the proposed field is used to build all them houses on.</p> <p>I am sure that I am not the only one that has been hit by another car using the lane due to the other drivers not being familiar with it and also going too fast.          I have also witnessed horses bolting out of control because of cars going to fast. As well as dog walkers having to leap out of the path of vehicles going too fast.          Lorry's have also caused problems getting stuck under the bridge, or as they approach the bridge they realize they cannot continue on and cannot turn around either, they have to reverse back to try and find a suitable place to turn and then find alternate routes, This also means other traffic having to reverse back and turn around.</p> <p>Manor road is already a nightmare to get up and down when leaving or trying to get home especially with all the cars that park to pick up/drop off kids to the two schools at writhlington. As a resident of the area this is a major concern already. Children/young people using these schools are at high risk already without this extra traffic from the proposed new build.          By Jones shop, many times I have witnessed children/young people dart across the main road and manor road and almost get hit buy a car and not long ago a young lad was knocked of his motorbike due to a vehicle turning into manor road from the main road and did not realise that the traffic was built up and they went straight into him damaging his bike, luckily he was not badly hurt. However with the proposal of this build and increased traffic this may not be the case next time and someone is going to get seriously hurt or even killed.</p> <p>In bad weather conditions, these roads are not treated by the council and individuals who live on hills will park their cars on Manor Road which causes issues already with getting in and out of the area. Trying to get out of manor road onto Writhlington hill to go to Radstock, or Frome is a nightmare and you can be sat waiting to pull out safely, at a minimum of five minutes. The roads mentioned above</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

are not suitable for more vehicle use and they are already overloaded and dangerous.

The proposed building work is inappropriate for this area because of the roads in and out, it is a remote area and will have a great impact on the environment, existing drainage and sewage systems as well as the health, safety and security of all who already live in this area.

In keeping with BANES Green infrastructure Policy building in this area would mean you would be going against this policy and as I have stated the area has already built houses that exceeded its quota of 50 houses.

I also wish to state that the proposed area; are Green Field Sites Outside The Housing Development Boundary and should not happen.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Joy Burt
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
<p>You need to introduce restrictions on student accommodation. All new accommodation should be provided on the campus. You have allowed most awful blocks of student accommodation within the community, which are blots on the landscape and not suitable for a World Heritage City. This has been rubber-stamped by the Planning Committee for so long, you should hang your heads in shame for allowing such unsightly buildings to be built. You have also allowed communities to disintegrate because, again, your Planning Committee have rubber-stamped Change of Use from Family Homes to HMOs. It is long overdue that this should be stopped and a cap should be sought to be applied to both universities, to ensure the cessation of further expansion. At present the number of students is approaching 30,000, and this is far too many for a small World Heritage City such as Bath. Also, landlords and students contribute nothing to the coffers of B&amp;NES Council in the form of Business or Council Tax, so no wonder this Council is in the red. Perhaps B&amp;NES Council New Year's Resolution could be to stop consulting on it, and actually do something positive.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Bush Lucy Bush
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS3 - Combination of locations outside and within the Green Belt
<b>Comment</b>
I am very opposed to the area rad 25/ rad 26 obtaining planning permission, not only is this a green belt area of outstanding natural beauty there are many other brown fill sights in the area that should be considered first , the access to this area cannot & will not be able to cope with any more traffic on manor road or the lanes surrounding this area this will make the school children put at greater safety risk. We have had our percentage of new houses built in the village over the last few years find somewhere else !!!

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Ian Bush
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS1 - Focussed approach avoiding the Green Belt
<b>Comment</b>
Access CANNOT be down manor road . The infurstracter is not good enough for the amount of homes you want to build . The access on to Frome road is already a accident waiting to happen . It is also green belt land . You should not even consider building on green belt

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Katherine Carlton
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
Although the new ring road is much needed, I do disapprove of it joining Whitchurch lane as this road has been extremely busy at certain times of the day without the added traffic. The road is not wide enough for 44 tonnes lorries, we have speed bumps and 20 mile zones as we have 3 schools very close by. This will end being a dangerous road to cross to get to Belland drive shops and bus stops which I frequently use. My road and surrounding roads will end up being rat runs to avoid the main road aswell. It's bad enough now with cars not abiding to the 20 mile rules!!! This route needs to be changed!!!

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Steve Carlton
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
<p>I'm actually a fairly progressive person and being a HGV driver myself, I understand the need for good connecting roads but the proposal to use Whitchurch Lane as part of the South Bristol Link Road is absolute madness. This road is not suitable and could never be made suitable to carry the proposed amount of traffic due to the residential aspect of the area which it will run through and the volume of traffic it already serves, particularly around rush hours and school pick up/ drop off times. There are 3 primary schools either on the road or just tucked away behind it and 2 pedestrian crossings which will presumably disappear, along with the 20mph zone and the 7.5 ton weight limit ? I object to the use of Whitchurch Lane for use as a link road.</p> <p>Yours faithfully,</p> <p>Steve Carlton.</p>



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Miss Wendy Carr
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
<p>I strongly object to any proposal which relates to using Whitchurch Lane as the route for linking Hengrove and Whitchurch to the Wells Road. Whitchurch Lane is already an extremely busy road and even with improvements to road junctions it will become a severely congested road especially once the new housing is built. This will have a very negative impact for Whitchurch residents and for Bridge Farm Primary School.</p> <p>Without the right transport infrastructure in place new businesses will not be attracted to the area and existing businesses will also look to relocate to other areas as the severe congestion on Whitchurch Lane will have a severe negative impact on their businesses. Whitchurch Lane will never be a suitable route which will create the right transport infrastructure to develop the area. Only the original plan to build a new link road will create the needed transport infrastructure to develop the area in terms of housing and to attract businesses to the area.</p> <p>I appreciate there is a need to build more housing in the area. However, new housing should for the time being only be built in areas where the appropriate road infrastructure is or will be in place such as the South Bristol Link road which even has a bus lane already in place.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Miss Wendy Carr
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH4 - Housing
<b>Comment</b>
<p>I strongly object to the proposed new housing in the Whitchurch area unless the right transport infrastructure is put in place. The original road proposed would provide the required transport infrastructure to accommodate the significant number of new homes proposed and to attract key workers to work in the proposed new GP surgery and school needed for the new housing. The new proposed road along Whitchurch Lane is entirely unsuitable and will not be able to cope with the increase in traffic from the new housing.</p> <p>Although I accept there is a need for new housing in the area this housing should for the time being be built near to the new South Bristol link road where the required road infrastructure is already in place including a bus lane for a future metro bus. New housing in this area should not be built until such time as the original proposed new road can be built.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Franco Cascio
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH2 - Whitchurch SDL Garden City Principles
<b>Comment</b>
I strongly disagree that the SDL route taking in WCH2 as part of the link route is not appropriate now and any future development expansion as this will impact on the health and well-being of the residents living there now and in the future, when future expansion would go ahead. A preferable route to all concerned would best be implemented when sufficient funds are available to develop a completely new road outside of residential areas and only link into the residential areas and not through them.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Rachel Chandler
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH1 - Strategic Planning Framework
<b>Comment</b>
<p>I STRONGLY OBJECT TO THE PLANS. Please register my objections.</p> <p>I write to you as a resident who lives within BANES and will be affected by the BANES/Bristol City Council decisions..</p> <p>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. Whitchurch Village sits in the Greenbelt. A review of the greenbelt was carried out in 2014 and land removed to accommodate the new development in Horseworld. The NPPF states that any review should be upheld and therefore i understand the next review should not take place until at least 2029 . This development goes completely against the National Planning Framework agreement and therefore appears unsound and contravenes Government policy.</p> <p>There sites that are far more sustainable haven been discount ( for example - Long Ashton was discounted as the residents ' valued their open spaces'. The resident in Whitchurch Village have watched as out "open spaces" have been concreted over . WE DO NOT want any more concrete and we NEED our green space - which also happens to be GREENBELT. I vote Conservative as I BELIEVED their promise to retain the greenbelt . DO NOT BREAK ANY ORE PROMISES.</p> <p>Whitchurch is NOT an area that will attract employment . WE FLOOD !</p> <p>â€¢ 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.</p> <p>â€¢ There are NO shops in the village. Again more car use.</p> <p>â€¢ There is no senior school within walking distance</p> <p>â€¢ No additional doctors surgeries planned. BANES residents are already using Stockwood and Whitchurch Health Centres. These GPâ€™s are not coping with the patients that they have already, getting an appointment is already quite difficult!</p> <p>â€¢ 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.</p> <p>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.</p> <p>The proposed 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 is bordering ridiculous. The proposed road ends on</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

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.

Please keep me updated with situation.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Ian Chant
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS1 - Focussed approach avoiding the Green Belt
<b>Comment</b>
<p>The new Local Plan 2016-2036 is proposing developments of RAD26 and RAD25 I want this to be stopped and these areas removed from the plan.</p> <ol style="list-style-type: none"><li>1. These are green field sites outside of housing development boundary.</li><li>2. Writhlington has already exceeded its quota for new houses in the last 18 months, so there should be no further housing until 2029.</li><li>3. It would go against BANES Green infrastructure policy.</li><li>4. The road infrastructure is already overloaded and dangerous.</li><li>5. 1500 children's lives are at risk every day at the A362 junction with Knobsbury Lane and Manor Road.</li><li>6. Any building work is inappropriate because there is no likelihood of effective drainage or sewage systems.</li></ol>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Nicola Chant
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS1 - Focussed approach avoiding the Green Belt
<b>Comment</b>
<p>The new local plan 2016-2036 is proposing development of RAD26 and RAD25. I want this to be stopped and these areas removed from the plan.</p> <ol style="list-style-type: none"><li>1. These are green field sites outside the Housing Development Boundary.</li><li>2. Writhlington has already exceeded its quota for new houses in the last 18 months, so there should be no further housing until 2029.</li><li>3. It would go against BANES green infrastructure policy.</li><li>4. The road infrastructure is already overloaded and dangerous.</li><li>5. 1500 children's lives are at risk every day at the A362 junction with Knobsbury Lane and Manor Road.</li><li>6. Any building work is inappropriate because there is no likelihood of effective drainage or sewage systems.</li></ol>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Teresa Chard
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)
<b>Comment</b>



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Teresa Chard
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH12 - Other comments on Chapter 6
<b>Comment</b>
<p><a href="http://www.bathnes.gov.uk/services/planning-and-building-control/planning-policy/local-plan-2016-2036">www.bathnes.gov.uk/services/planning-and-building-control/planning-policy/local-plan-2016-2036</a></p> <p>Following on from the recent consultation meeting in Stockwood Library, I am writing to register my concerns and strong objection to the planned developments in South Bristol, the orbital highway link and the proposed park and ride site on the A37 as outlined at the meeting and within the above plan.</p> <p>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 &amp; 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.</p> <p>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.</p> <p>Added to this, the orbital highway link would slice through Stockwood Vale and onwards, which is at present a valued quiet area, which supports a wide range of species such as Barn Owls. The effect on the environment in this area would be devastating. The long-term damage to the local ecology and the eco system through building the road and the proposed number of housing would be irreversible.</p> <p>The proposal to build 1.500-2.500 houses will destroy the Village of Whitchurch and its environs. This figure appears disproportionate to other areas giving the feeling of discrimination. Where is Bath contributing to this housing need? Bristol should look to utilise brownfield sites such as the now abandoned Arena at Templemeads.</p> <p>The proposed development is to be all on Green Belt land. Residents were recently asked about the JSP and 98% of respondents wanted the Green Belt retained. The NPPF at paragraph 14 clearly states that housing targets should not override constraints. At Whitchurch Village two such constraints are the Green Belt and Flooding.</p> <p>Air pollution already exceeds the National guidelines and will only increase with increased housing</p>

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**Representations received online:**

leading to a further minimum increase of 5000 cars on already congested roads. The plan for the new extension of the ring road also appears to plan to direct traffic away from the A37, towards smaller, local roads. This, in my humble opinion, is madness.

The proposed link road to Hicksgage/Brislington Road will only attract more cars through the Village and will not help our neighbouring village of Pensford where the A37 is regularly closed due to lorries being unable to pass each other and a Park and Ride will also add to the traffic. Highways Officers have publicly stated that their plans will not improve the traffic situation which would seem then to be a complete waste of public money. When I attended the Stockwood consultation, the representative from BANES agreed the proposed road would do nothing to alleviate traffic in the long term. Rather, he agreed that if the proposed housing plan goes ahead, the area would reflect the traffic, noise and air pollution issues felt from Warmley and beyond due to the green belt development for Lyde and Emerson's Green etc.

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 council's 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 30mph 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. Funneling 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.

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I feel equal consideration should be given to discuss the option to build the houses at Hicksgate/Brislington Road. This site can offer “

Immediate access to Ring Road for easy travel to Motorways, Park and Ride, Rail link for commute to Bristol and Bath for employment, Employment close by, Schools both senior and junior Shops/supermarket, Post Office etc, Doctor surgery, Dentist.

Whitchurch Village cannot tick any of the above, demonstrating why this is not a sustainable location. The Village has recently lost Green Belt land for approximately 250 houses.

Turning to the proposed new Park and Ride on the A37. 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 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

Teresa Chard.

43 Pomfrett Gardens  
Stockwood  
Bristol  
BS14 8SX.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

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**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Kirsten Clark
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH2 - Whitchurch SDL Garden City Principles
<b>Comment</b>
<p>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".</p> <p>The Local Plan will have a devastating impact on cells 52D, E, F &amp; G as shown in the Green Belt Assessment. Each of which makes a major contribution to checking the sprawl of Bristol.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	mr James Clark
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)
<b>Comment</b>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	mr James Clark
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
<p>I strongly object to the plans. my objections are to the proposed link road between A4 hicks gate at keynsham and church lane / whitchurch lane at Whitchurch . I object to this because -A this road will be a development of the open farm land green belt B the road will bring more noise and pollution to whurchurch brisligton and stockwood C The proposed road ends in the middle of whitchurch a area of 20mph speed limits and speed bumps .D The road will next to bridgefarm school.E whurchurch lane and the surrounding roads are already very busy more cars vans and lorries will not help this f The A37 at pensford will be more of a bottle neck for traffic with cars traveling on the proposed link road to get on the A37.G The cost of the proposed link road would be a complete waste of money as it is not a ring road extension from hicks gate but way of opening up a area of south of Bristol to traffic and housing that it does not need.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	mr James Clark
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH4 - Housing
<b>Comment</b>
I strongly object to the puposed houseing development on the edge of whitcurch, whitchurch does not have space for urban development schools and doctors are full, roads are full . the purposed building area is green belt.



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Marion Clark
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
<p>I would like to express my concerns regarding the plan for running the above road along either Washing Pound Lane (very narrow) or Half Acre Lane and on to Whitchurch Lane with close proximity to the now enlarged Bridge Farm School.</p> <p>The proposed route has been narrowed in places and has 2 zebra crossings and many speed bumps. There is a 20 mph speed limit going past Bridge Farm School. There is also a considerable amount of extra traffic there at school opening and closing times. Where the speed limit increases it is unsafe to drive at 30 mph due to the speed bumps and parked cars.</p> <p>I understand that there is a weight limit on part of this road so it would be unsuitable for heavy vehicles.</p> <p>This seems to be an ill-conceived plan where the effects of an increased traffic flow have not been fully thought through.</p> <p>Marion Clark</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr David Clarke
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 5 - Keynsham and North Keynsham Strategic Development Location (SDL)KSM4 - Link Road alignment
<b>Comment</b>
The connection to the Keynsham Road needs a roundabout or traffic lights

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr John Cockerham
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>	
CHAPTER 3 - Spatial Strategy including the rural areasSS4 - Allocations	Review of Rural Areas Site
<b>Comment</b>	
<p>This is specifically relates to the village of Temple Cloud. Recently this village has endured 80 new homes within the village without any significant additions to the village infrastructure or the road network. The primary school is at capacity, the road traffic has increased due to the extra cars the new homes have produced. The doctors surgery is struggling to cope and further housing within the village will have a dangerous detrimental effect to the residents living in the village. Both to their living conditions and dangerous road network. BANES has done nothing to improve the infrastructure of the village due to the additional 80 homes and building further homes will cause dangerous travel through the village on a road network that can hardly cope at the moment.</p> <p>Furthermore, Temple Cloud has more than fulfilled its allocation of new homes under the Joint spatial Plan and it is unfair for it to be burdened further with more homes.</p> <p>Therefore I strongly object to further homes being built within the village.</p>	

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Helen Cockram
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
<p>I am at a loss as to how Whitchurch Lane can be considered as an option to join the south Bristol link road to the A37. It is already a busy road on which is the large, popular, successful Bridge Farm Primary school. There is a permanent pedestrian crossing and also a twice daily temporary 'lollipop lady' crossing on Whitchurch Lane and the speed limit is 20mph.</p> <p>Parking is already a nightmare with parents using side roads either side of Whitchurch Lane to drop off and pick up.</p> <p>Half Acre Lane is one of the routes proposed for the link road. This road has a direct entrance to the school with an extended pavement for children's safety, and again has a 20mph speed limit. Parents park on both sides of this road, often making the road restricted to single file traffic at drop off and pick up times. Has anyone visited this area at 8.45am or 3pm? May I suggest someone does, to observe the situation and understand that the idea of turning it into a link road is ridiculous. I'm more than happy to provide photos if this is what is required to get the point across. I'm guessing the road would have no parking if it became the link road? Please let me know where the parents would then park. It may be suggested that they walk their children to school or take public transport.</p> <p>Unfortunately, modern life doesn't always allow this luxury and the government encourages parents to work, often resulting in parents having no choice but to drive their children to school before rushing off to work.</p> <p>The 20mph speed limits were imposed by the council for the safety of local children. Mobile speed cameras frequent Whitchurch Lane to enforce this. How can a 20mph road be a link road? Or will the speed limit be increased to 30mph, in effect retracting the 20mph enforcement? If this is the case, maybe anyone who has received a speeding fine should be reimbursed?</p> <p>There has clearly been no consideration of the health, safety or wellbeing of local children. Not only will the increase in traffic be an increased risk of injury to children, it will increase pollution along roads which border their school.</p> <p>Is it not time that the reality of the south Bristol link road linking to the A37 is realised, there is no viable option through Whitchurch.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Miss Patricia Collins
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH12 - Other comments on Chapter 6
<b>Comment</b>
<p>I write to you as a resident who lives within Bristol City Council but will be affected by the BANES/Bristol City Council decisions..</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>â€¢ 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.</p> <p>â€¢ There are NO shops in the village. Again more car use.</p> <p>â€¢ There is no senior school within walking distance</p> <p>â€¢ No additional doctors surgeries planned. BANES residents are already using Stockwood and Whitchurch Health Centres. These GPâ€™s are not coping with the patients that they have already, getting an appointment is already quite difficult!</p> <p>â€¢ 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.</p> <p>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.</p> <p>Please keep me updated with situation.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr David Constant
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH4 - Housing
<b>Comment</b>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr David Constant
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH4 - Housing
<b>Comment</b>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Michael Cooke
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>	
CHAPTER 3 - Spatial Strategy including the rural areasSS1 - Green Belt	Focussed approach avoiding the
<b>Comment</b>	
See attachments Pages 1, 2 and 3.	

**Attachments Included**

<http://www.bathnes.gov.uk/sites/default/files/webform/img571.jpg>

<http://www.bathnes.gov.uk/sites/default/files/webform/img572.jpg>

<http://www.bathnes.gov.uk/sites/default/files/webform/img573.jpg>



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Michael Cooke
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS1 - Focussed approach avoiding the Green Belt
<b>Comment</b>
<p>Re. Proposed housing on RAD25 &amp; RAD26 in the new Local Plan 2016-2036 currently under consultation.</p> <p>BANES Topic Paper: Developing an appropriate special strategy for non-strategic growth produced Winter 2018 defines Writhlington as a RA1 village and suggests for the period 2011-2029 that around 50 new dwellings in the village within HDB is acceptable. Writhlington is over this quota as 55 houses have been built on the end of Knobsbury Lane, the Methodist Chapel has been converted into a house and 2 houses built in the garden, a new house in Manor Road, and a new house in Old Road. Writhlington has fulfilled its commitment and there should be no further housing considered until 2029.</p> <p>Both these areas are outside the Housing Development Boundary. According to BANES Core Strategy &amp; 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 has not developed a Neighbourhood Plan as yet so no building outside the HDB can, or has been identified.</p> <p>In the Placemaking Plan 2017 BANES identified in the Somer Valley there is a 'high level of existing housing commitments exacerbating the imbalance of housing over jobs'. 'It is important that additional housing does not worsen the balance between homes and jobs and the out-commuting problem'. There is minimal employment in Writhlington so new house holders would all have to out commute for work.</p> <p>Writhlington village infrastructure is limited and badly positioned. It has only a small village shop and very limited public transport. All residents are car dependent as they need to travel to both work and amenities. As most employment is in Bath there would be a significant increase in traffic using Church Hill, Old Road and Green Parlour Road in order to avoid the standstill commuter traffic in Radstock town centre.</p> <p>Any new development here goes against BANES Spatial Vision of 'reducing car use' and 'maintaining a low carbon economy'.</p> <p>BANES Strategic Objectives include 'ensure the location and layout of new development enables and encourages people to make the best use of public transport, walking and cycling'. Public transport in Writhlington has been severely reduced and it would be dangerous to cycle on any of the access roads due to heavy traffic or narrow steep lanes with poor visibility. Walking is also difficult in view of the steep terrain, lack of pavements and distances involved.</p> <p>The Placemaking Plan states 'there is no immediate prospect of large scale funding to trigger road infrastructure improvements within the plan period'. Road infrastructure is already overloaded and dangerous and will not support any more housing development.</p> <p>The Manor Road/Knobsbury Lane/Old Road/Frome Road junction is gridlocked at peak times with the</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

huge amount of traffic accessing both the schools and the Sports Centre. It is extremely dangerous especially considering the large number of students walking to school. There are over 1500 students using this location. This junction cannot support any additional traffic without the use of traffic lights. Access to both RAD25 and RAD26 would be along Old Road, Green Parlour Road, Church Hill or Manor Road. All these roads are effectively single track as Manor Road is narrowed to a single carriageway due to residents parking.

It has already been brought to the council's attention the numerous accidents on Church Hill and Green Parlour Road. They are both steep and narrow with high hedges and poor visibility leading to a narrow bridge and railway arch on a blind bend. Commuters to Bath use these roads to avoid the heavy congestion in Radstock town centre at peak times.

Increasing the level of traffic without road and bridge widening should not be considered. Students who walk down Church Hill to access Peasedown St. John already take their lives in their hands as there are no pavements and drivers who use this route as a rat run show them no consideration. Clearly, RAD26 and RAD25 are not suitable for development on the new Local Plan without significant upgrades of the current road and improved access.

The development appears to be at odds with BANES Green Infrastructure Strategy. The sites are green fields when there are existing brown field sites within the Somer Valley area that should be prioritised. One field is agricultural while the other supports a chicken farm. BANES spatial vision states we should 'grow more local food'. Building on these sites will be counterproductive to this. BANES identify the woodland below RAD26 as a site of Nature Conservation Importance. Building on the hill above will increase water run off potentially contaminating and damaging this protected woodland.

There is no drainage or mains sewer infrastructure in RAD26 and the slope of the land in both RAD25 and RAD26 would make achieving an effective drainage or sewage system extremely difficult. Radstock's sewage system is already over capacity with the increased amount of housing in Writhlington and Radstock it would not sustain another development and it would take massive groundworks affecting more green field sites to implement a new system.

Church Hill and Green Parlour Road regularly turn into rivers with their land drains unable to cope and in the winter months icy conditions have caused cars to completely lose control. The water run off means the road surface is poor and damaged increasing the poor quality of these roads.

The Spatial Strategy also states that we need to 'help conserve, enhance and restore the diversity and resilience of the District's 'wildlife'.

We know there are slow worms, bats, hedgehogs and dormice in both these areas. Some of these are protected species and building must not be allowed near their habitat.

At both RAD25 and RAD26 leisure facilities are very limited. BANES propose a new town park in Midsomer Norton as their major leisure investment to Somer Valley in the Local Plan. This park will not be accessible for young people in Writhlington without transport and so is of no benefit to them. BANES council wants to 'ensure that linkages to greenspaces and sustainable routes are prioritised. The greenspace in Somer Valley is the cycle track. Writhlington residents have access to this greenspace either down Church Hill or Green Parlour Road which are already dangerous and without pavements. Increasing the traffic load on these roads will make access to the greenway even more hazardous.

Without providing local leisure facilities and activities, especially for young people without transport BANES could be feeding into anti-social behaviour patterns.

**CONCLUSION**

Writhlington has already met its quota of new houses until 2029.

RAD25 and RAD26 are outside the Housing Development Boundary.

The road infrastructure is already overloaded and dangerous.

RAD25 and RAD26 are green field sites.

There is minimal employment in Writhlington so new houses means out commuting and more traffic on the roads.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

There is no drainage or sewage infrastructure.

Very poor public transport.

No social amenities for young or old people.

Housing needs to be provided where there is a good road, drainage and public sewer infrastructure, strong transport links and plenty of amenities both medical and social.

This is not RAD25 and RAD26.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Miss Kelly Coombs
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
Any other comments
<b>Comment</b>
<p>As a work commuter I understand the joys of making links easier, however as I'm currently living just off half acre lane I can tell you now there is no more room for additional transport on this road. My children currently go to bridge farm opposite and numerous times I have already seen near missus of children and buses when it's pick up time. The parking is already a huge issue without turning it into an a road.</p> <p>The housing pros postal is ridiculous as well considering for one I can barely get an appointment myself at the armada practice. The schools are overstated already which is why new schools outside of Whitchurch were built. The land you are planning to use is a massive part of the dog walking community where we feel save .</p> <p>With 2 young children I would be mainly devastated to have more toxic fumes in our community. I moved here so I would not use my car for the school run so to have thousands more cars on my doorstep, long term would mean a contribution towards bad health I'm certain!!</p> <p>This must stop and be readjusted for the houses and road completely relocated</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Dr Claire Craig
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
<p>The references to transport contain no information beyond the general commitments. The A37 at the junction with Staunton Lane is already narrow and at peak times heavily congested, with some houses fronting directly on to the road. Has Air Quality by the traffic lights been tested? Regardless of commitments to public transport, traffic is bound to increase. What provisions will be made for people entering or exiting their properties, or having deliveries (which currently block the A37), or using the pavements, which are narrow and exposed to the slipstream of cars and lorries? The proportion of cars:houses at the new development at Keynsham looks high and Whitchurch estate car ownership is high. What assumptions are being made about traffic at the pinch points? (also the lights at Gilda Parade on the A37)</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Dr Claire Craig
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH2 - Whitchurch SDL Garden City Principles
<b>Comment</b>
The Garden City Principles look good, and might help to ensure the development reflects some of the character, biodiversity, quietness, history and environment of the area that is being lost.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Donna Crook
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
Any other comments
<b>Comment</b>
<p>I STRONGLY OBJECT TO THE PLANS. Please register my objections.</p> <p>I write to you as a resident who lives within Bristol City Council but will be affected by the BANES/Bristol City Council decisions..</p> <p>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.</p> <p>If this goes ahead, the increased traffic will spew into Whitchurch Lane.</p> <p>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.</p> <p>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.</p> <p>Please keep me updated on the situation.</p> <p>Yours sincerely Donna Crook</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Beverley Cruse
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>	
CHAPTER 3 - Spatial Strategy including the rural areasSS1 - Green Belt	Focussed approach avoiding the
<b>Comment</b>	
<p>I am writing regarding proposed housing on RAD25 and RAD 26 in the new Local Plan 2016-2036 currently under consultation.</p> <p>BANES Topic Paper: Developing an appropriate special strategy for non-strategic growth produced Winter 2018 defines Writhlington as a RA1 village and suggests for the period 2011-2029 that around 50 new dwellings in the village within HDB is acceptable.</p> <p>Writhlington village is over this quota as 55 houses have been built on the end of Knobsbury Lane, the Methodist Chapel has been changed into two dwellings and a new house has been built on Manor Road. Writhlington has fulfilled its commitment and there should be no further housing until 2029.</p> <p>Both these areas are outside the Housing Development Boundary. According to BANES Core Strategy &amp; 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 has not developed a Neighbour Plan as yet so no building outside the HDB can, or has been identified.</p> <p>In the Placemaking Plan 2017 BANES identified in the Somer Valley there is a "high level of existing housing commitments exacerbating the imbalance of housing over jobs". It is important that additional housing does not worsen the balance between homes and jobs and the out-commuting problem. There is minimal employment in Writhlington so new house holders would all have to out commute for work.</p> <p>Writhlington village infrastructure is limited and badly positioned. It has only a small village shop and very limited public transport. All residents are car dependent as they need to travel to both employment and amenities. As most employment is in Bath there would be a significant increase in traffic using Church Hill or Green Parlour Lane in order to avoid the standstill commuter traffic in Radstock town centre.</p> <p>Any new development here goes against BANES Spatial Vision of "reducing car use" and "maintaining a low carbon economy".</p> <p>BANES Strategic Objectives include "ensure the location and layout of new development enables and encourages people to make the best use of public transport, walking and cycling". Public transport in Writhlington has been severely reduced and it would be dangerous to cycle on any of the access roads due to heavy traffic or narrow steep lanes with poor visibility. Walking is also difficult in view of the steep terrain, lack of pavements and distances involved.</p>	



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

The Placemaking Plan states “there is no immediate prospect of large scale funding to trigger road infrastructure improvements within the plan period”.

Road infrastructure is already overloaded and dangerous and will not support any more housing development.

The Manor Road/ Knobsbury Lane/ Old Lane/ Frome Road junction is gridlocked at peak times with the huge amount of traffic accessing both the schools and the Sports Centre. It is extremely dangerous especially considering the large number of students walking to school. There are over 1500 students using this location. This junction cannot support any additional traffic without the use of traffic lights.

Access to both RAD25 and RAD26 would be along Old Lane, Green Parlour Lane, Church Hill or Manor Road. All these roads are effectively single track as Manor Road is narrowed to a single carriageway due to residents parking.

It has already been brought to the council’s attention the numerous accidents on Church Hill and Green Parlour Lane. They are both steep and narrow with high hedges and poor visibility leading to a narrow bridge and railway arch on a blind bend. Commuters to Bath use these roads to avoid the heavy congestion in Radstock town centre at peak times. Increasing the level of traffic without road and bridge widening should not be considered. Students who walk down Church Hill to access Peasedown St John already take their lives in their hands as there are no pavements and drivers who use this route as a rat run show them no consideration.

Clearly RAD26 and RAD25 are not suitable for development on the new Local Plan without significant upgrades of the current road and improved access.

The development appears to be at odds with BANES Green Infrastructure Strategy.

The sites are green fields when there are potential brown field sites within the Somer Valley area that should be prioritised. One field is agricultural while the other supports a chicken farm. BANES spatial vision states we should “grow more local food” Building on these sites will be counterproductive to this.

BANES identify the woodland below RAD26 as a site of Nature Conservation Importance. Building on the hill above will increase water run off potentially contaminating and damaging this protected woodland.

There is no drainage or mains sewer infrastructure in RAD26 and the slope of the land in both RAD25 and RAD26 would make achieving an effective drainage or sewage system extremely difficult.

Radstock’s sewage system is already over capacity with the increased amount of housing in Writhlington and Radstock it would not sustain another development and it would take massive groundworks affecting more green field sites to implement a new system.

Church Hill and Green Parlour Lane regularly turn into rivers with their land drains unable to cope and in the winter months icy conditions have caused cars to completely lose control. The water run off means the road surface is poor and damaged increasing the poor quality of these roads.

The Spatial Strategy also states that we need to “help conserve, enhance and restore the diversity and resilience of the District’s wildlife”.

We know there are slow worms, bats, hedgehogs and dormice in both these areas. Some of these are protected species and building must not be allowed near their habitat.

At both RAD 25 and RAD26 leisure facilities are very limited. BANES propose a new town park in Midsomer Norton as their major leisure investment for Somer Valley in the Local Plan. This park will not be accessible for young people in Writhlington without transport and so is no benefit to them.

BANES council wants to “ensure that linkages to greenspaces and sustainable routes are

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prioritised. The greenspace in Somer Valley is the cycle track. Writhlington residents have access to this greenspace either down Church Hill or Green Parlour Lane which as previously discussed are already dangerous and without pavements. Increasing the traffic load on these roads will make access to the greenway even more hazardous.

Without providing local leisure facilities and activities, especially for young people without transport, BANES could be feeding into anti-social behaviour patterns.

**CONCLUSION**

Writhlington has already met its quota of new houses until 2029.

RAD25 and RAD26 are outside the Housing Development Boundary.

The road infrastructure is already overloaded and dangerous.

RAD25 and RAD26 are green field sites.

There is minimal employment in Writhlington so new houses means out commuting, and more traffic on the roads.

There is no drains or sewage infrastructure.

There are protected species habitats on both these sites.

Very poor public transport.

No social amenities for young or old people.

Housing needs to be provided where there is a good road, drainage and public sewer infrastructure, strong transport links and plenty of amenities both medical and social. This is not RAD25 and RAD26

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**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Gemma Cuff
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH3 - Strategic Design Objectives
<b>Comment</b>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Ms Jess David
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
<p>I submit this response to the Bath and North East Somerset Local Plan 2016-36 Options Consultation in my capacity as a community member and a Lib Dem candidate for the May 2019 local elections. Over the last few months I have spent time meeting and talking to local residents on the doorstep in the Moorlands ward and hearing their concerns.</p> <p>My comments largely concern housing policies in Bath and are relevant to the Moorlands area. The ward includes the Moorlands estate, a section of Englishcombe Lane and Bloomfield Road/ Grove and Park. The key issue are:</p> <ul style="list-style-type: none"> <li>- The development area to the south of Englishcombe Lane (SB17)</li> <li>- The growth of HMOs</li> </ul> <p>SB17 South of Englishcombe Lane</p> <p>The site is pending a decision for development of 37 residential dwellings. However there has been an "in principle" objection raised by the council's ecologist to the proposal due to its impact on the loss of ecology on a designated site of nature conservation interest.</p> <p>I have spoken to a number of residents who share varied concerns about the development proposal. Whilst I recognise the need for new housing development and in particular greater provision of affordable housing, it no longer seems appropriate that this site is identified as a priority site for development. Rather it should be preserved and enhanced a green space, as part of a network of green spaces across the city, continuing to provide eco-services including habitat space and drainage etc. Policy to develop this site should be removed from the plan.</p> <p>The growth of HMOs/ student population</p> <p>The growth of HMOs across the city and in Moorlands is evident. I have heard local residents' concerns about the change of use of smaller properties reducing the availability of smaller homes to rent or buy, as well as worsening parking issues. I would support further controls to manage the introduction and extension of HMOs.</p> <p>I agree that there is likely to be an ongoing demand from the student population for HMOs as they provide a generally cheaper source of accommodation to purpose built student accommodation. I feel there needs to be a shift in balance in approach in order to prioritise people who live and work in Bath for the long term. The universities must be encouraged to accommodate more of their students on campus.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Colin Davies
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 5 - Keynsham and North Keynsham Strategic Development Location (SDL)KSM1 - Strategy for Keynsham
<b>Comment</b>
<p>There are huge concerns of increased congestion in Keynsham with associated problems such as difficulty with access to Keynsham roads and businesses, and increases in air pollution due to proposed new housing developments in and around Keynsham and around Keynsham.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Peter Davis
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areas
<b>Comment</b>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Richard Dean
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH12 - Other comments on Chapter 6
<b>Comment</b>
<p>Dear Sirs,  I would comment on your proposals re the local plan for the construction of a large number of homes at Whitchurch.</p> <p>1. Whilst your idea of a garden village all sounds great on paper in truth this is just a piece of creative writing! In practice you will just destroy the current village in favour of your dream of something better and whilst delivering it, you will destroy the current green belt which is mostly used for agriculture. Your proposals are completely unsound and not sustainable for this type of massive development within Whitchurch, obviously this proposal was written by people who do not live in the village of Whitchurch and have simply no idea of its requirements or the problems your vision will deliver once implemented.</p> <p>This is not just an extension of Whitchurch; this is the construction in numbers of a new village / small town. In fact, the development as shown will dwarf the current village. I don't think you should even call it Whitchurch, you should be honest and give it a proper new place name perhaps "Hursley Vale", "Penchurch" or "Whitford" thus telling the truth about what you are delivering not dress it up as something it is not.</p> <p>2. With such a large development, you will not integrate it with the current community. It is too large and too far away from the village to be an integrated community and not least because the two will be separated by the new roads that are proposed. This development will not integrate with Whitchurch any more than Gilda Parade area does, the two are quite separate communities</p> <p>3. Once again you move the boundaries on green belt to suit your own requirements with no protection to the green belt as was promised by government.</p> <p>4. Whilst you may be pressurised by government to provide housing you should not push schemes that just tick boxes to meet requirements, it is never acceptable to cause detriment to a community in creating another. You have completely miss read what Whitchurch requires in housing needs. What is required is a small development of starter homes, not this level of housing and development. What Whitchurch needs you to build are starter homes that sell for £200,000 to £250,000 for young people to get on the property ladder together with small bungalows for those who wish to down size but stay within the community they know and a reasonable number of proper council type housing available at affordable rents a proposal of this type might find some backing within the community.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

You only need to look on one of the various house sale sites to see there is an abundance of £325,000 plus houses in this area which are in fact now not selling quickly.

5. The new roads suggested are not far enough out to alleviate the traffic problems in Whitchurch and Pensford. Chelwood is the right place, you need to be looking at the bigger picture, of course this would cost more to achieve, but if you wish to really sort out the problems and take on the long term then you need to look beyond to provide a road system that will be able to cope, your system will be at capacity very quickly and you will end up back in the same congested problem in only a short space of time.

The best place to put a new road would be to go from Chelwood roundabout to The Globe roundabout and then from Chelwood up to the airport. If that was all improved and built, and with the use of weight restrictions you could stop all HGVs except for access from both Whitchurch and Pensford, and then if they put the park and ride at Chelwood, you could commute into Bristol, across to Bath and up to the airport and even link to your Brislington park and ride if required so providing a proper linked up transport system. Certainly this is a more joined up strategy because airport traffic is also set to rise.

Your current suggestions will just create a bypass for Hicksgate and cause more congestion on the A37 which already has air pollution problems.

As far as I can see, the proposed houses and park and ride scheme will end up causing greater traffic and tail backs.

7. Roundabouts slow traffic, hence a roundabout at the Norton Lane junction would slow traffic because the new roads back to Hicks Gate and Whitchurch Lane would make this possibly a five to six exit roundabout. You would have more traffic coming and going in both directions from the new development, from the A4 and from Whitchurch Lane, hence I believe this will make a junction that will be as busy as Hicks Gate at peak times. Both Whitchurch and Pensford will be affected as traffic queues back.

8. As for a park and ride placed in Whitchurch, this will increase traffic. Traffic will come not only from Pensford but with the new roads; traffic from the A4 and also from the Whitchurch Lane side will also be using it. With the number of houses that are being built in the Whitchurch Lane area (I believe Bristol has something like 11,000 new homes planned around this area), imagine if these people all decide to use this "easily accessed" park and ride at Whitchurch.

9. Another concern is in the way this new road will split the old village from the new development. When you see it on the map, if boundaries are once again reassessed, the real Whitchurch village could end up being moved in to the Bristol boundary in favour of BANES keeping its newly created village as Whitchurch this would be totally unacceptable to the families who have lived here for generations.

10. Going back to the park and ride, from the discussions I had with the BANES representatives at the recent meeting, it seems you would expect the park and ride buses to travel into Bristol on the A37, this will be something like 4 to 6 buses per hour. Imagine the knock on effect of this on traffic, particularly at school times when the road is half blocked with cars collecting children. You will have HGVs and buses trying to pass, a recipe for an accident. There is no way to introduce bus lanes because of the viaduct and the narrowness of the A37 through Whitchurch, and of course 4 to 6 buses an hour will do wonders for the air quality in the village!



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

11. Another thing to consider is the Bath Clean Air Zone. If this goes ahead, you will find that traffic movements from the Bath side to Bristol will change and it is likely that the A37 might see an increase in traffic generally, as people look to avoid Bath. There will certainly be HGVs that will look to avoid Bath and find other runs to bring them from that side to Bristol without incurring the charge.

12. All of this does not take into account the massive rise in housing that has taken place in Keynsham recently. With a park and ride at Whitchurch I can envisage people in Keynsham seeing this as a good option to get into Bristol as there are plenty of short cuts to Whitchurch from Keynsham.

13. Quite honestly I think BANES don't really know where Whitchurch is! The idea of better pedestrian walking and cycling links to Bristol and Keynsham are a joke, especially if they are considering narrowing the pavements along the A37 to improve the road! Which you are currently considering. In a telephone call with BANES recently re the Staunton Lane junction, you confirmed that the crossing proposal here would be a secondary concern to keeping traffic flowing. proving that your only interest is in ticking government requirement boxes and keeping traffic moving not safety or quality of life.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Susan Dean
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH12 - Other comments on Chapter 6
<b>Comment</b>
<p>Dear Sirs,</p> <p>I would comment on your proposals re the local plan for the construction of a large number of homes at Whitchurch.</p> <p>1. Whilst your idea of a garden village all sounds great on paper in truth this is just a piece of creative writing! In practice you will just destroy the current village in favour of your dream of something better and whilst delivering it, you will destroy the current green belt which is mostly used for agriculture. Your proposals are completely unsound and not sustainable for this type of massive development within Whitchurch, obviously this proposal was written by people who do not live in the village of Whitchurch and have simply no idea of its requirements or the problems your vision will deliver once implemented.</p> <p>This is not just an extension of Whitchurch; this is the construction in numbers of a new village / small town. In fact, the development as shown will dwarf the current village. I don't think you should even call it Whitchurch, you should be honest and give it a proper new place name perhaps "Hursley Vale", "Penchurch" or "Whitford" thus telling the truth about what you are delivering not dress it up as something it is not.</p> <p>2. With such a large development, you will not integrate it with the current community. It is too large and too far away from the village to be an integrated community and not least because the two will be separated by the new roads that are proposed. This development will not integrate with Whitchurch any more than Gilda Parade area does, the two are quite separate communities</p> <p>3. Once again you move the boundaries on green belt to suit your own requirements with no protection to the green belt as was promised by government.</p> <p>4. Whilst you may be pressurised by government to provide housing you should not push schemes that just tick boxes to meet requirements, it is never acceptable to cause detriment to a community in creating another. You have completely miss read what Whitchurch requires in housing needs. What is required is a small development of starter homes, not this level of housing and development. What Whitchurch needs you to build are starter homes that sell for £200,000 to £250,000 for young people to get on the property ladder together with small bungalows for those who wish to down size but stay within the community they know and a reasonable number of proper council type housing available at affordable rents a proposal of this type might find some backing within the community.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

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**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

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**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Miss Faye Dicker
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
<p>I STRONGLY OBJECT TO THE PLANS. Please register my objections.</p> <p>I write to you as a resident who lives within BANES and will be affected by the BANES/Bristol City Council decisions..</p> <p>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.</p> <p>If this goes ahead, the increased traffic will spew into Whitchurch Lane.</p> <p>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.</p> <p>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.</p> <p>â€¢ 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.</p> <p>â€¢ There are NO shops in the village. Again more car use.</p> <p>â€¢ There is no senior school within walking distance</p> <p>â€¢ No additional doctors surgeries planned. BANES residents are already using Stockwood and Whitchurch Health Centres. These GPâ€™s are not coping with the patients that they have already, getting an appointment is already quite difficult!</p> <p>â€¢ 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.</p> <p>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.</p> <p>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.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

Please keep me updated with situation.

**Attachments Included**

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Matt Donovan
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH1 - Strategic Planning Framework
<b>Comment</b>
<p>The proposal to build up to 5000 houses across the proposed link road in the form of approx. 2500 homes at Whitchurch village, 750 homes on the existing Park and Ride site at Brislington along with the additional homes reported on the Garden Centre site and surrounding fields. This figure is disproportionate to other areas giving the feeling of discrimination for our area.</p> <p>Air pollution already exceeds the National guidelines and will only increase with a further minimum increase of 5000 cars on already congested roads.</p> <p>The proposed residential and road development is to be all on Green Belt land. Residents were recently asked about the JSP and 98% of respondents wanted the Green Belt retained. The NPPF at paragraph 14 clearly states that housing targets should not override constraints. At Whitchurch Village two such constraints are the Green Belt and Flooding.</p> <p>The proposed link road A4174 to Whitchurch Lane will in no way reduce the congestion of vehicles heading into Bristol as ultimately they will still end up on either the A4 or A37. With the additional homes the existing traffic issue will only be made worse. The road will however run the risk of becoming a short cut for travelling from Somerset and Devon onto the motorway network along with HGVs using the link road to avoid the M4 / M5 interchange.</p> <p>Highways Officers have publicly stated that their plans will not improve the traffic situation which would seem then to be a complete waste of public money.</p> <p>The only element of the proposal that works is to move the Park and Ride closer to Hicks Gate roundabout and to reopen both lanes into Bristol on the A4. However building 750 homes on the existing site would clearly make that road improvement pointless.</p> <p>The green belt study here <a href="http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/LP20162036/lp_201636_io_whitchurch_green_belt_assessment.pdf">http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/LP20162036/lp_201636_io_whitchurch_green_belt_assessment.pdf</a> makes it very clear that “The assessment shows that all the cells make a MAJOR CONTRIBUTION to checking the unrestricted sprawl of large built up areas. The introduction of development into these cells would therefore have a highly negative impact on the Green Belt in relation to this purpose.”</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
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The green belt is made up of pasture which is home to countless wild animals including deer, foxes, badgers, birds of prey including a number of beautiful owls. On a smaller scale but no less important we have a huge variety of wild birds both nesting and migratory, the hedgerows and pasture are home to millions of vital insects which are suffering from shrinking habitats, once these insects, birds and animals are gone they are gone for good.

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

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

Therefore I want to state that I strongly object to these proposals and suggest more be done to improve public services, transport links, park and rides and school places near children's homes.



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Miss Levi Dorrington
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH1 - Strategic Planning Framework
<b>Comment</b>
<p>I am commenting in respect of the proposed new road to either extend to whitchurch Lane via half acre road or washing pound lane. I strongly disagree with these proposals which will no doubt effect the local area badly. The area is already congested without directing further vehicles to smaller roads with slower speed limits in highly residential area with parks and schools surrounding the proposed new road. Bridge farm school is on half acre road and putting a main road directly outside is not only dangerous, will cause even more traffic on school dropping off and collecting hours. I live near half acre road and would be devastated if the new road comes along here. I urge to visit the area and re look at your plans . To also build lots of new houses nearby with no new school or doctors is ridiculous ascurrent residents already struggle to get their children in to local schools and to get doctors appointments as it is - adding more people in to that would have devastating results .</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Paddy Doyle
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
No more student accommodation should be build in Bath City Centre. University accommodation should be built on site. Emphasis in the City should be on real homes that people who wish to put down roots in the City should be able to buy, or at least rent affordably, preferably from non-profit-making bodies.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Jane Dury
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH12 - Other comments on Chapter 6
<b>Comment</b>
<p>I viewed the plans at the community centre and was disappointed to see that the proposed development and roads appears to disregard the only amenities that the village has, community garden and play area, cricket and rugby pitches. These facilities are used by large numbers of people and are at the heart of the community.</p> <p>Secondly, I understand the saving in transport times will be minutes and the new road joins a road with speed bumps and near to a primary school.</p> <p>Finally , whilst I agree that housing and education in the area is lacking , has a feasibility study support this in the area?</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Mark Dury
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
<b>Comment</b>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Mark Edworthy
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH12 - Other comments on Chapter 6
<b>Comment</b>
<p>Although I am appreciative of the desire and need for more housing, I think choosing Whitchurch village is both wrong, and underhanded.</p> <p>Squeezing more housing into another area within the Whitchurch / Stockwood/Hengrove borders seems like it's trying to solve all the BATH and BANES housing numbers by pushing them somewhere else. The schools are already full, the roads are already full, so how this is sustainable on the A37 corridor is beyond me.</p> <p>And onto transport. There is not the infrastructure to sustain these houses and the proposed road is a farce. How can it be possible that a proposed option for a RING ROAD, literally drives next door to a school that will have around 1000 school children crossing this road at peak times twice a day?</p> <p>Surely there is a case of endangering children and even potentially pollution issues.</p> <p>one of the proposals for the "orbital highway" is to squeeze it down a single carriageway hill right beside a school on a road that is immensely busy at peak times already.</p> <p>It's just not thought out by anyone who has even a remote care/knowledge of the area.</p> <p>Can this decision please be explained?</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Brian Ely
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH12 - Other comments on Chapter 6
<b>Comment</b>
<p>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" .</p> <p>The Local Plan will have a devastating impact on cells 52D, E, F &amp; 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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>

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**Representations received online:**

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 a "Value for Money" and if local tax payers should be asked to foot the bill!

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Jane Evans
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS1 - Focussed approach avoiding the Green Belt
<b>Comment</b>
<p>I am opposed to the development of RAD25 and RAD26 and urge you to remove these areas from the Local Plan because:</p> <ol style="list-style-type: none"><li>1. These are green field sites which are outside the BANES agreed Housing Development Boundary.</li><li>2. Writhlington has already exceeded its quota for new houses in the last 18 months and no further housing development should be considered until at least 2029.</li><li>3. Development of RAD25 and RAD26 would contravene BANES Green Infrastructure Policy.</li><li>4. The road infrastructure is already overloaded and dangerous and would be unable to cope with the massive increase in traffic that development of these sites would bring. Children's lives would be increasingly endangered as they attend the primary school and secondary school in Writhlington, particularly at the junction of the A362 with Manor Road and Knobsbury Lane.</li><li>5. Writhlington is an area of historical interest with part of Lower Writhlington a conservation area. Any development of RAD25 an RAD26 would have a massive detrimental effect on this area with vehicles attempting to drive through a narrow, often flooded country lane.</li></ol>



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Jeffrey Evans
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>	
CHAPTER 3 - Spatial Strategy including the rural areasSS1 - Green Belt	Focussed approach avoiding the
<b>Comment</b>	
<p>I would want the proposed development of RAD26 and RAD25 removed from the new local plan. These are green field sites outside of the Housing Development Boundary. Writhlington has already exceeded its quota for new houses in the last 18 months. The road infrastructure is already overloaded and the 5 way A362 junction with Knobsbury Lane and Manor Road poses a real risk to the school children from St. Mary's primary school and Writhlington Comprehensive school.</p> <p>Any building work would be inappropriate because there is no likelihood of effective drainage or sewage system.</p> <p>Increased housing would inevitably increase the traffic which use Church Hill and Green Parlour Lane as a "cut through" to Peasedown St. John and on to Bath. This single lane "cut through" passes over a river bridge and under a railway bridge both of which need strengthening and repair.</p> <p>The Green Field site have important hedgerow and woodland areas which support important wildlife.</p>	

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Peter Fear
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH8 - Green Infrastructure
<b>Comment</b>
The aspirations of 6.14.3 and 6.14.4 regards delivery of advanced green infrastructure and environmental projects ahead of built development should be embedded in WCH8.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr David Fenton
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
Any other comments
<b>Comment</b>
To limit new student accommodation to the campuses is not sufficient to deal with the impact of student housing on the ability to meet Bath's own housing needs. Yes. it would free up any new sites coming available for general housing, but what it would not do is to prevent any increase in student use of the EXISTING housing in Bath arising from any overall growth in the capacity of the 2 Universities. Any growth of the Universities needs to be matched by an equivalent addition of new student housing on the campuses themselves. The policy needs to contain this 2 pronged approach.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Stephen Filer
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS2 - More dispersed approach avoiding the Green Belt
<b>Comment</b>
<p>I would like to object to the proposed development at whitchurch. The sheer volume of development and destruction of the green belt conflicts with my understanding of planning guidance. The lack of local employment suggests many more vehicles will be seeking routes through unsuitable lanes to places of work and the addition of a link road will potentially create a greater issues with traffic flow The required new homes should be added in controlled numbers around the area and adjacent to employment opportunities including Bath which seems to be missing its substantial share of development</p> <p>Our village and area are to be severely effected if not overwhelmed which is contrary to local and national guidelines</p> <p>Thankyou in anticipation of a reformed plan</p> <p>S Filer</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Andrew Fletcher
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH2 - Whitchurch SDL Garden City Principles
<b>Comment</b>
I find your proposal to build 2500 at Queen's Charlton with out completion of a ring round to take traffic away from Whitchurch totally unacceptable.If we have to build more homes then let us build the correct infastructure that will solve our traffic problems for the next 25 years.The orbital road through Whitchurch is merely going to move our existing bottle neck a quarter of a mile down the road

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Neil Fountain
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH1 - Strategic Planning Framework
<b>Comment</b>
<p>The proposals are very weighted to the Queen Charlton side of the A37, thus threatening the conservation aspects of this village; a better balance would be achieved by having development on both sides of the A37. However, the reality is that this level of development, however it is arranged, will swamp the existing and precious town and village set-up in this part of south Bristol. The infrastructure proposals are also totally inadequate to cope with the traffic generated by development, given how much traffic has increased over the past 10 years without any significant development. It really is essential that a park and ride scheme into Bristol uses a new route - reopening the railway line is the obvious means - as the A37 cannot under any circumstances cope with increased usage.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Ms Sarah Freeman
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 5 - Keynsham and North Keynsham Strategic Development Location (SDL)KSM9 - Avon Valley Adventure and Wildlife Park
<b>Comment</b>
<p>Residents of Bitton have contacted South Gloucestershire and BNES about the noise disturbance we have had to endure from this Park.</p> <p>I would object to any plans to make it bigger and I object to its current licence agreement it has with BNES.</p> <p>Until this noise disturbance issue has been resolved satisfactorily I object to any improvement proposals for the AVCP.</p> <p>It has been allowed to get away with disturbing Bitton residents for far too long and its licence for operation needs to be reviewed. I do not want to see any expansion of this site.</p> <p>Also the traffic chaos the AVCP causes when it holds events is unacceptable, until the Bath Road/Pixash Lane can be improved than events should be put on hold. It is unacceptable that residents and road users have to put up with traffic chaos and noise caused by events held at the park. The Bath Road is a main road for commuters and businesses and these events causes buses to be delayed and is also a strain on the health service e.g. ambulances and the fire services.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Ms Sarah Freeman
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 5 - Keynsham and North Keynsham Strategic Development Location (SDL)KSM11 - Other comments on Chapter 5
<b>Comment</b>
<p>I challenge the Local Plan on the issue of population too increase by 30% but its total traffic to reduce below current levels.</p> <p>Sufficient people will not walk, cycle or use the bus service as they are all not fit for purpose.</p> <p>Currently cyclists rarely use the path on the Keynsham Road preferring instead to use the road causing chaos for drivers who find it hard to get pass especially during peak times. If cyclists are not using the paths provided at the moment then you cannot expect them to use any future paths provided.</p> <p>Walking is an unacceptable mode for OAP's which Keynsham has a high amount of. The majority of Keynsham population are OAP's who cannot easily walk, or cycle.</p> <p>The bus service is currently unreliable and expensive. Services are constantly changing and being withdrawn, if there is to be an increase in population then why are the bus services being cancelled and withdrawn? fares are becoming too expensive for people to use the service e.g. Â£7.00 return to Bath from Bitton, Â£2.50 single to Keynsham from Bitton that is Â£5.00 return for a 4mile journey! Surely more services are needed not being taken away by First bus profit driven services. The train station at Keynsham the service is poor, overcrowded and there is no where too park to catch the train by 10:00am all the car parks are full with commuter parkers. More parking facilities are required. If the population increases in Keynsham so will the traffic as the services are not in place for people too use e.g. trains/buses/cycle paths.</p> <p>Keynsham and Saltford are currently a "car park" at the moment due to the increased traffic caused by all the house building. The High Street is suffering as people do not wish to visit Keynsham due to it poor laid out one way system that makes it a "Car Park".</p> <p>Before any congestion charge can be introduced you need to have alternative systems in place for people too use, currently the cycle paths, bus service and train service is NOT sufficient for its current population let alone any increase in population, see above comments.</p> <p>The services are getting worse not better and this issued needs to be addressed.</p> <p>Soon there will be NO bus service for Keynsham as the A4 is now looking at not stopping in Keynsham, what does that leave?</p>



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**Representations received online:**

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Ms Sarah Freeman
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH11 - Relocation of Brislington Park & Ride
<b>Comment</b>
<p>I object to the relocation of this P&amp;R as a lot of Council Tax money was spent on the current P&amp;R in the first place. You obviously did not forward plan when building the existing P&amp;R or else it would not now be needing to be moved. I call this bad planning and a waste of Council Tax payers money which you have badly managed.</p> <p>Also I object to any consideration of the allotments being moved or relocated. The Council have a duty to provide allotments for residents and the site is widely used and they have a right to be there. I am appalled at the waste of Council Tax payers money in relocating a P&amp;R site that has had money spent on it that now appears to be a waste. The Council cannot afford to waste Councils Tax payers money when they are making constant cut backs on vital services, yet you have appeared to of made incorrect decisions on future plans.</p> <p>The P&amp;R should not be moved and should stay where it is. We do not need houses/flats on an already busy road.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Richard Gapper
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH12 - Other comments on Chapter 6
<b>Comment</b>
<p>I am writing to strongly object to the proposal of 2000 homes and an Orbital Road (rat run) in Whitchurch. I am absolutely disgusted, saddened and very distressed that this is even being proposed. The proposal is unsound for many reasons.</p> <p>Bath and North East Somerset Council and Bristol City Council can write to all residents informing them that council tax has gone up, but at no point have residents received any information from either council with reference to this proposal, even though this proposal will affect people’s lives dramatically. This is hardly a fair consultation process when many people are totally unaware of this and it is bound to affect people’s lives dramatically and future decisions. I am only aware of this from social media and some leaflets posted by independent organisations. Therefore, this consultation is fundamentally unsound.</p> <p>The NPPF states “The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open”. In your Local Plan, the Green Belt Assessment of Green Belt Purposes Cell 52G Purpose 1 (sprawl) Major Contribution. Purpose 3 (encroachment) Contribution. The proposal of the Orbital road is in cell 52G putting a road through here puts a VERY HIGH risk to open opportunities for developers to develop around this creating urban sprawl. This area is important to keep in Green Belt to protect against urban sprawl and the boundary</p> <p>To propose a Bristol Ring Road, South Bristol Link Road, or Orbital Road coming out onto Half Acre Lane/ Washing Pound Lane leading onto Whitchurch Lane is ridiculous. Half Acre Lane is a 20mph speed limit with Bridge Farm Primary School on this road. At peak times this area is full of children, parked cars, the pavement has been widened at the school gate on Half Acre Lane which has not worked as cars crash into the pencils quite frequently. To put the link road via here will make the road hazardous and dangerous for the children.</p> <p>Currently Whitchurch Lane has a weight restriction in place, I have heard this may be removed so HGVs can travel through Whitchurch Lane, assuming Half Acre or Washing Pound Lane as well. If this is true, this road will be horrendous, as the roads are not designed at all for this. I assume the weight restriction on Whitchurch Lane at present is either for physical or environmental reasons, is the road able to accommodate an increase in weight?</p> <p>The purpose of weight limits: -  Prevent damage to the highway  Protect the character and environment of rural areas, villages and residential estates  Manage congestion on our roads</p>

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Reduce risk to vulnerable road users, including pedestrians and cyclists.

So, you now feel that Whitchurch Lane requires none of these!!

Bath and North East Somerset quote on BANES website "by introducing 20mph speed limits on local streets we are improving road safety even further" Half Acre Lane and part of Whitchurch Lane are 20mph and should stay 20mph.

As a previous resident on Whitchurch Lane I know how busy and noisy this road is. It was a 30mph speed limit, but the road was dangerous, so chicanes were put in place. This did not last long as they were deemed dangerous, and many accidents happened. The chicanes were removed, and speed bumps and speed reductions were put in place to a 20mph limit. Has council policy changed now, 30mph is suddenly a safe speed whilst dramatically increasing the number of vehicles using this road. Getting onto Whitchurch Lane from adjoining roads is already hazardous with 2000 more homes being built on Hengrove Park and the proposed 2000 homes in Whitchurch Village this can only get worse. This road will be even more congested, Bristol City Council said an increase of 80%, which is disgusting, noise and pollution levels will be awful.

BANES have said traffic pollution level is not dangerous, has this been tested with another 2000 homes, 3500-4000 cars using the road? It should be. Has BANES even looked/walked the route of this proposed new road, do you know this area, if this was seriously being investigated you would know this is not a suitable route.

BANES quote new cycle routes walking routes, have any surveys been done to see who would cycle or bus/walk to work, where peoples employment is. This is all done on assumption that people can/would use it. Metrobus is hardly an unmitigated success!

I am a cyclist, I see more people walking their dogs in the fields you propose to put a road through than I see cycling on the Hartcliffe Way at peak times.

The field off Half Acre Lane for the proposed road has a public footpath where people regularly walk their dogs, these fields should be kept as Village Green Space.

BANES quote to create imaginative play, forest and meadow habitat? Why are we creating this, we have this already which you want to take away? Walking my dog for 1 hour in the fields the other day I had the pleasure of seeing so much wildlife we spotted, cows, deer, squirrel, Jay, Wood Pecker, Pheasant and hare. This is what is so amazing about Whitchurch, you are ruining it for future generations. It is an amazing environment with open countryside and most importantly promoting health/wellbeing.

JSP quote no dwellings to be built without the road/park and ride. Whitchurch is not suitable for this road at all. The proposed road here is not fit for purpose. It will have a devastating effect on the area and would no longer be a place where I would want to live.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Angela Garland
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
Any other comments
<b>Comment</b>
<p>I wish to object to Whitchurch Lane becoming the route for traffic to be directed through as it will pass a large primary school which is already a very busy junction at school times. There is currently no pedestrian crossing there and the increased traffic will no doubt cause road traffic accidents in that area. The state of the road surface is already appalling with divets, potholes &amp; road humps. The side roads will become rat runs which will be more dangerous for school children walking to school. The road cannot be widened and is just a ridiculous option for bigger, heavier goods vehicles to come through a highly populated residential area.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	mr matthew garland
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 5 - Keynsham and North Keynsham Strategic Development Location (SDL)KSM4 - Link Road alignment
<b>Comment</b>
<p>I DISAGREE WITH THE PLANS FOR THE LINK/ ORBITAL HIGHWAY AROUND WHITCHURCH. I FEEL THE THE OLD 1990 PLANS TO CIRCLE THE FOOT OF DUNDRY HAVE BEEN SCRAPPED TO SAVE MONEY DUE TO THERE BEING NO LAND TO BUILT ON THERE.</p> <p>THE NEW PLANS TO CONNECT THE LINK ROAD TO WHITCHURCH LANE ARE A HALF MEASURE TO GET THE PERMISSION FOR THE ROAD TO BE BUILT SO THAT HOUSING CAN BE BUILT ACROSS STOCKWOOD AND QUEEN CHARLTON.</p> <p>I AGREE WE NEED A LINK ROAD, BUT WE NEED ONE THAT WORKS, A DUAL CARRIAGEWAY WITHOUT TRAFFICE LIGHTS AND ROADABOUTS, A LINK ROAD MODELLED ON THE M25 OR M42 THAT CIRCLES THE CITY AND ALLOW TRAFFIC TO PEEL OFF USING SLIP ROADS TO PREVENT A BUILD UP OF TRAFFIC.</p> <p>IF CURRENT PROPOSALS GO AHEAD, WHITCHURCH LANE WILL END UP BEING THE SOUTH BRISTOL VERSION ON HAMBROOK DURING RUSH HOUR.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Barrie Gaulder
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
<b>Comment</b>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr David Glasspool
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH8 - Green Infrastructure
<b>Comment</b>
<p>Additional roads and buildings on green belt land will add to an already polluted area. Diesel and petrol fumes are at an unacceptable level currently. 2500 houses would equal at least 3000 more vehicles and less green land to help 'soak up' fuel emissions. Do we want to expose our children and grand children to this.</p> <p>When fields and trees are replaced with concrete the risk of flooding increases. With a warmer, wetter climate as predicted by scientists the likelihood of flooding increases year by year. As an example the stream at the rear of the houses in Church Meadows has overflowed twice in the last 2 years.</p> <p>There is also a danger to wild life, Certain species of birds and bats are in decline as well as Badgers, all of whom will have their habitats further reduced.</p> <p>Our local police stations, hospitals and Health centres are 'bursting at the seams' How can our police and Doctors be expected to protect and care for this burgeoning population.</p>



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mes Amy Goldsworthy
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH1 - Strategic Planning Framework
<b>Comment</b>
<p>I object to the proposal of the plans to pass roads through Whitchurch, especially past bridge farm primary school as the traffic is already heavy at very times of the dat and have been various near misses involving children and cars. This makes it even more unsafe with children walking to and from school and could lead to parents driving their children, creatinine traffic and parking chaos at school times.</p> <p>Whitchurch lane is often stop start at evening rush hour and would not accommodate more traffic.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Peter Goodwin
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH2 - Whitchurch SDL Garden City Principles
<b>Comment</b>
<p>Whitchurch 'Garden Village' SDL and associated orbital roads.</p> <p>The plans as presented will add to climate change emissions, yet We know that we simply can't afford to allow climate change emissions to increase.</p> <p>It's especially unacceptable in a greenfield development, because if we can't reduce emissions when starting from scratch, there's no way we'll ever do it to existing developments. The project should therefore be restarted, with climate change reductions as the first measure of acceptability. Recognise this crisis - or make it even worse.</p> <p>WCH2 and WCH3: The Whitchurch SDL " 'Garden Community' principles</p> <p>It has to be said that the emphasis on 'Garden Community' principles is to be welcomed " indeed, similar principles should be the default for all new development.</p> <p>That said, what's proposed is deeply flawed in at least two respects.</p> <p>Make the 'village' really carbon neutral.</p> <p>In the real world there can be few developers who will honour the letter of the policy as it stands. It needs to be far stronger(for instance, with a clearer specification to reduce the embedded energy of the development), and binding " and if developers don't care for it, then it's up to the local authority or other public-interest body to make it happen.</p> <p>Cars</p> <p>Cars and driving are responsible for around one-sixth of the average persons carbon footprint. There's an opportunity here to build a community with very low reliance on the car " a win/win provision that would encourage less damaging forms of transport, whilst removing some of the traffic that makes the alternatives less viable and, of course, improving the 'garden village' environment.</p> <p>Second, the 'low impact' of the development is totally undermined by the lack of any serious reference to cars.</p> <p>Managing with less cars</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

If there are less cars in the SDL, it releases more land for more homes and/or for a better quality environment that encourages more interaction. This might be achieved by using 'resident's parking zone' principles, perhaps with tradeable permits, ensuring that the SDL doesn't become a potential overspill for the P&R. It should be possible to impose a limit of (say) 1 car per household avg within the SDL. Car Club provision could make it unnecessary to keep a car for occasional or contingency use.

Keeping the city centre accessible

For a P&R to succeed, it must provide better access for buses to the city centre than the existing congested, polluted route along the A37. It will only come about if there are effective limits on private and commercial traffic into the city centre. That must mean real measures to limit longer term city centre parking (public and workplace) and/or a congestion charge that would discourage the most polluting vehicles. Without such measures, the regions 'green' pretensions will remain a hollow promise.

WCH7 – The A37 Whitchurch to Whitchurch Park link

Unacceptable as part of a Ring Road, but attractive as a bus-only route, linking any new Whitchurch settlement and P&R with new developments at Hengrove Park, and providing both with car-free options for travel into the city centre or on orbital routes – all without imposing intolerable traffic on the area.

The A37 Whitchurch to A4 Hicks Gate link.

Also unacceptable as part of a Ring Road. Even so, bus/sustainable travel alternatives could add to the options that make a car-free lifestyle viable. It's hard to imagine that a link of this length could be 'bus-only', even as part of a key orbital route, but there are viable alternatives. That part of the route alongside Stockwood wouldn't be needed if the buses went instead along Stockwood Lane. The link from the lane to Hicks Gate should be bus-only. And provide for bikes and walkers, of course.... filling a serious gap in current networks

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Darren Gould
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH1 - Strategic Planning Framework
<b>Comment</b>
<p>This proposal is outrageous in that it simply passes the traffic problem from one area to another.</p> <p>The new roads also cut across valuable green belt, one of which is in close proximity to Queen Charlton village - an area of historic importance.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Dr David Graham
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS4 - Allocations                      Review of Rural Areas Site
<b>Comment</b>
<p>Comments re RAD25 and RAD26 brought into focus by developer intentions to build 165 houses.</p> <ol style="list-style-type: none"> <li>1. Writhlington village infrastructure is limited and badly positioned <ul style="list-style-type: none"> <li>- With only a tiny village shop, all residents need to travel to access both employment and services</li> <li>- Public transport is poor and most residents are heavily car dependent</li> <li>- any development will significantly worsen the balance between homes and local employment opportunities</li> </ul> </li>   <li>2. The road infrastructure is already overloaded and dangerous and will not support such a development <ul style="list-style-type: none"> <li>- the 5 way junction with the main road is already gridlocked at peak times (particularly with the huge amount of traffic accessing the secondary school and leisure centre) and is exceedingly dangerous</li> <li>- Manor Road with resident parking on one side and the continuing road up to the Peasedown bypass is effectively single lane. Together with Green Parlour lane (similarly restricted), they are already heavily used not only by local traffic but also as rat runs with commuters and businesses travelling from the north and south seeking to avoid Radstock centre. The route is heavily congested at peak times and is accident prone</li> <li>- the prospect of dumping up to 200 additional cars onto this infrastructure defies logic</li> </ul> </li>   <li>3. The development appears to be at odds with the Council's Green Infrastructure Strategy <ul style="list-style-type: none"> <li>- the sites are green field when there are potential brown field sites within the Radstock area which should be prioritised</li> <li>- they are outside the housing boundary which should be preserved if it is to be a meaningful planning criterion</li> <li>- the proposed development will cause significant environmental damage in a sensitive area. For example, Church Hill regularly turns into a river with land drains unable to cope. The problem will be exacerbated by large scale developments limiting the ability of the ground to absorb water</li> </ul> </li>   <li>4. The educational and leisure facilities for children and young people are limited <ul style="list-style-type: none"> <li>- previous BANES policy statements have indicated that developments should not be considered unless there is adequate educational provision</li> <li>- whilst St Marys primary school apparently has some vacancies it is unlikely to meet the</li> </ul> </li> </ol>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

demand imposed by a significant housing development

- the secondary school is already oversubscribed
- on a more general point, the influx of a large number of youngsters with limited local leisure facilities and activities may well feed into anti-social behaviour patterns

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Miss Lucie Gray
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
<p>I don't believe that placing the additional section of the ring road through Whitchurch is in the best interest of that or surrounding communities. It looks to me to be going right by a primary school which would be unsafe for the children.</p> <p>I also think that moving the Brislington park and ride would cause additional pollution from the cars traveling further from Bath to use the service. None of this proposal seems to have considered trying to improve the access into or around Bristol through Brislington.</p> <p>I cannot see how taking the road right through the heart of a village community is either fair or wise? Surely it would be better to see if the road layout can be improved through Brislington.</p> <p>This feels like a simple excuse to open up more green belt land to make it accessible to build more houses in an area which is already saturated with new housing and little improvement to infrastructure, Schools, Dr's, Hospitals etc to support it.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Lorraine Green
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
<p>I object to the proposal to route the link road from Hicks Gate through Whitchurch Lane on the following grounds:</p> <p>1 Whitchurch Lane is already heavily congested and to reroute thousands of extra vehicles per day along this narrow route through the middle of a housing estate within metres of the doorways and windows of local households will result in an excessive increase in environmental air pollution and noise pollution to everyone living in close proximity to the route. This presents a severe risk of harm to the health and wellbeing of everyone living along the route.</p> <p>2: the suggestion to route the new road along Half Acre Lane would be laughable if it wasn't so ridiculous! I find it hard to believe that any council officer/member could suggest this - I can only assume that no one involved in suggesting/agreeing to this route has been to the site to inspect it. The existing road here is very narrow and would need to be widened. Presumably this will mean taking away land from the allotments and school playing fields from one side of the road. My objections to this are:</p> <p>3: The damage caused to the natural environment and community cohesion by destroying the allotments - they are currently a well used and much appreciated community facility.</p> <p>4: the extremely negative impact on the health and wellbeing of the local primary school children by having thousands of vehicles rerouted past their building. The school is a very large primary with many children attending from some distance away. There is currently an entrance to the school in Half Acre Lane. If this has to close because of the new road it will result in major congestion in East Dundry Road, Half Acre Close and nearby roads near the school., which are already heavily congested at school times. The entrance in Half Acre Road was opened two years ago to relieve this congestion. If this entrance is closed it will cause congestion in all the roads at the other side of the school.</p> <p>The original, long standing plan for the link road was routed from the A37 skirting along the lower Dundry Slopes, skirting around all the local housing, towards the Hengrove Way ( known locally as the Hartcliffe Roundabout )'to join the existing Bristol South Spine road route. This earlier planned route would have a lesser negative impact on the health and wellbeing of local residents. It is evident that the health of people including the health of children, has been totally disregarded in this quickly devised ramshackle, poorly thought through new scheme which will decimate sections of the Whitchurch neighbourhood and community. In conclusion I strongly object to the new route proposal and suggest that the Regional Mayor whose supposed job is to obtain funding for appropriate transport schemes, does the job he was voted in for and obtains sufficient funds to provide a new road through an appropriate route - an actual ROAD IMPROVEMENT.</p>



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Katie Green
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH12 - Other comments on Chapter 6
<b>Comment</b>
<p>For those of you with very little spare time, who would still like to make their views known to those that matter.</p> <p>I have sent my views to:</p> <p>transport_planning@bathnes.gov.uk local_plan2@bathnes.gov.uk jacob.reesmogg.mp@parliament.uk Karin.smyth.mp@parliament.uk comment@jointplanningwofe.org.uk The Bristol Mayor (via Bristol City councils' website)</p> <p>If it is easier you are welcome to paste and copy the message below (adjusting to suit you and/or the recipient).</p> <p>If you have strong views about the proposals then you have until 7th Jan 2019 to make them known.</p> <p>I hope that this helps all you busy people!</p> <p><b>SUGGESTED OBJECTIONS</b></p> <p>I STRONGLY OBJECT TO THE PLANS. Please register my objections.</p> <p>I write to you as a resident who lives within Bristol City Council but will be affected by the BANES/Bristol City Council decisions..</p> <p>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.</p> <p>If this goes ahead, the increased traffic will spew into Whitchurch Lane.</p> <p>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.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

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.

â€¢ 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.

â€¢ There are NO shops in the village. Again more car use.

â€¢ There is no senior school within walking distance

â€¢ No additional doctors surgeries planned. BANES residents are already using Stockwood and Whitchurch Health Centres. These GPâ€™s are not coping with the patients that they have already, getting an appointment is already quite difficult!

â€¢ 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.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs valerie gulliford
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>	
CHAPTER 3 - Spatial Strategy including the rural areasSS1 - Green Belt	Focussed approach avoiding the
<b>Comment</b>	
<p>1:these are green field sites outside of the Housing Development Boundary.</p> <p>2:Writhlington has already exceeded its quota for new houses in the last 18 months so there shouldn't any further housing until at least 2029.</p> <p>3:it will go against BANES Green Infrastructure Policy.</p> <p>4:the road infrastructure is already overloaded and dangerous, Churchhill is already very dangerous as it is used as a rat run from new housing estate as well as local people to Bath missing out the centre of Radstock,many use it to get to the local 2 schools St Marys primary and Writhlington Secondary school, Churchhill is already only a single track road and some people have extended their drives which has narrowed the road even more, nearly every morning when I try to exit my property I nearly lose the front of my car as others drive too fast up and down the road and when I am returning home people cannot wait for me to reverse into the drive and then I get abuse from them because they have to wait.There is no footpath down Churchhill either and the new street light are dangerous as they only light up underneath themselves.</p> <p>5: the lives of 1500 or more children's live's and other pedestrians are at risk every day on the junction of Manor Road, Knobsbury Lane and Old Road and the main A362 motorists don't take much notice of the speed limit, or speed camera or the pedestrian crossing as motorists drive too fast.</p> <p>6: Any more building work is inappropriate because there is no likelihood of effective drainage or sewage systems,</p> <p>7:flooding if you put more housing surrounded by concrete drives, paths and tarmac roads the rain water just gets pushed onto somewhere else, like when Orchid Way was built the excess rain water flooded the road over to the other side into the car park behind the village hall, who then had to take action and sent the water into the next gardens further on down the road.</p> <p>8:have you actually ventured along any of these roads at peek times or does your computer say it's okay without knowing or visiting the area.</p>	

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr paul gulliford
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>	
CHAPTER 3 - Spatial Strategy including the rural areasSS1 - Green Belt	Focussed approach avoiding the
<b>Comment</b>	
<p>this idea has to be stopped.          These are green field site outside of the Housing Development Boundary.          Writhlington has already exceeded its quota for new houses in the last 18 months so there should be no further housing until 2029.          It would go against BANES Green Infrastructure Policy.          The road infrastructure is already overloaded and extremely dangerous especially Churchhill which is a single lane road used as a rat run to and from Bath or Writhlington sports centre and secondary school.          it would put the lives of 1500 or more children as well of adults every day at risk on the junction of the A362 with Manor Road, Knobsbury Lane and Old Road which is already a nightmare to use as well as dangerous          Any building work is inappropriate because there is no likelihood of effective drainage or sewage systems.          The roads around Writhlington are not suitable for the amount of traffic here already so any more vehicles added from all the extra housing proposed will only add to the problems          Living on Churchhill you take your life in your own hands either walking (no footpath) or driving getting our car in or out of our property is a nightmare where you can be verbally abused because other drivers cant wait.          This is a bad and wrong idea and there is other spaces that could be used if only the local council could look at the areas not just accept the proposals and the financial gain from developers.</p>	

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr paul gulliford
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>	
CHAPTER 3 - Spatial Strategy including the rural areasSS1 - Green Belt	Focussed approach avoiding the
<b>Comment</b>	
<p>this idea has to be stopped.          These are green field site outside of the Housing Development Boundary.          Writhlington has already exceeded its quota for new houses in the last 18 months so there should be no further housing until 2029.          It would go against BANES Green Infrastructure Policy.          The road infrastructure is already overloaded and extremely dangerous especially Churchhill which is a single lane road used as a rat run to and from Bath or Writhlington sports centre and secondary school.          it would put the lives of 1500 or more children as well of adults every day at risk on the junction of the A362 with Manor Road, Knobsbury Lane and Old Road which is already a nightmare to use as well as dangerous          Any building work is inappropriate because there is no likelihood of effective drainage or sewage systems.          The roads around Writhlington are not suitable for the amount of traffic here already so any more vehicles added from all the extra housing proposed will only add to the problems          Living on Churchhill you take your life in your own hands either walking (no footpath) or driving getting our car in or out of our property is a nightmare where you can be verbally abused because other drivers cant wait.          This is a bad and wrong idea and there is other spaces that could be used if only the local council could look at the areas not just accept the proposals and the financial gain from developers.</p>	

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Miss Rebecca Hales
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH12 - Other comments on Chapter 6
<b>Comment</b>
<p>I have not been directly consulted on this by the Council but I have found out that my garden is shown on the plans as including a new footpath straight through my garden, via my neighbour's garden and in turn onto mine. This new footpath is ill thought out and it is borderline antagonistic to find out vicariously through others about a proposal which would alter the value of my property and my family's privacy and use and enjoyment extensively. The thought of a footpath through my garden has been troubling me greatly. The footpath appears to derive from schematic arrows on an earlier revision demonstrating green links and connectivity. At the previous revision, the links appeared to acknowledge existing green links in the form of two footpaths which are Ringspit Lane and the further footpath link in Blackrock. I object to the footpath proposed on the schematic drawing since it fails to acknowledge the already existing footpaths and the green links which they bring, additional green links should be used and connected to, new PROW are not justified, the complexities of dealing with 4 landowners and a new footpath through their private gardens has not be understood in the line indicated. I have been assured by B&amp;NES that this line was schematic only and that in reality new links would not be requested and that the existing Ringspit Lane and footpath through Blackrock would be sufficient green connectivity, but this has been causing me a lot of concern and I need to object to this as a 'belts and braces approach'. We note also that our property sits outside the red line referred to in all Local Plan documents for the area of strategic development and we therefore note that there may be no mandate for the Council to pursue such links through private land under the guise of the Local Plan, please also consider this point. Whilst these links are a secondary thought to some following the major developments in the area, they are very real and a forefront concern of mine and my families and we would prefer to be consulted directly in the future for matters which potentially affect our home.</p> <p>I would also like to register an objection on the basis of drainage to any development of the field opposite Pentivae house on the opposite side of Woollard lane. This field floods entirely several times a year and acts as an attenuation pond, the surface water from the field is then slowly released into Ringspit Lane (not adopted) through drainage installed by the council for which there appears to be no consent. The drainage attenuation currently to the size of that field would be required to compensate for the additional hard standing and prevent a severe impact on the small ditch in ringspit lane which is already overloaded and in poor repair, any future development uphill would need to be met with sufficient attenuation and calculations re the impact down stream in ringspit lane, further there would actually need to be consent to discharge and upgrades. The impact of the additional hardstanding will not be insignificant.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Richard Hall
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH12 - Other comments on Chapter 6
<b>Comment</b>
<p>My prime concern is the fact that your indicative route for the road from the A4 to the A37 is very close to housing in Stockwood,which will create a serious pollution issue.The indicative route is,I am told by your staff at the presentation at Whitchurch on 19/11/18,has been chosen as it is the easiest to build but that should not be the prime driver and the health and well being of the residents of Stockwood should be paramount.There is a significant amount of land between Stockwood and Stockwood Vale to enable the road to be located a reasonable distance from the edge of Stockwood and with significant tree planting between the road and Bifield Rd,Stockwood,the problems of air pollution can be diminished,albeit not eradicated. Given it is the responsibility of local authorities to seek ways and means to reduce air pollution,this should be a key issue in planning the route,rather than opting for the cheapest option.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Angela Hall
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
There is no need for a new road from the A4 to the A37 but if it the decision is made to build it then it should be as far away as possible from the housing in Bifield Rd,Stockwood,ideally in Stockwood Vale to hide it from existing housing and also minimise the effects of pollution on the residents of Stockwood



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Angela Hall
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
<p>I am totally opposed to the road from the A4 to the A37 as it's proposed location so close to houses in Bifield Rd, Stockwood will create unacceptable pollution. It should be built much closer to Stockwood Vale and as far away from housing in Stockwood as possible. As the majority of purchasers of the houses planned for Whitchurch will work in Bristol, there must be a major question as to how the A37 will cope with an extra x thousand cars in the rush hour. It is accepted that some will use the Park &amp; Ride and a few may cycle but they will be in the minority and they will certainly not walk as suggested by your representative at the exhibition in Stockwood library.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Ms Rebecca Hall
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS4 - Review of Rural Areas Site Allocations
<b>Comment</b>
<p>Temple cloud has already seen a dramatic increase to housing over the last few years, the local infrastructure is not developed to handle more housing to the area.</p> <p>Please do consider the lack of public transport to the local super markets as well as to Bath being no existent, this means that people from a lower income or older generation would be isolated.</p> <p>The local schools are getting close to capacity and no room for expansion, look at St Vigor and St John in Chilcompton some classes over the legal limit due to more family houses being built.</p> <p>Doctor surgery is over subscribed and very hard to get an apple tent at the local surgery without transport the other surgery would be unreachable.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	jenny hall
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH12 - Other comments on Chapter 6
<b>Comment</b>
I am concerned about the impact the proposed new ring road and the building of 2000 new houses in Whitchurch will have upon the community of Stockwood. The loss of green belt land in Stockwood vale .The additional pressure 2000 more houses will have upon the healthcare services in Stockwood and the increased congestion it will cause. Stockwood would become an island consumed and encircled by a ring road of traffic .I see no benefits for the people of Stockwood for these proposed new developments.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Martin Harris
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
Having read a number of articles/reports there is little consideration to improving the Transport infrastructure, more a case of saturating the current poorly designed/operated system. The current proposals do not suitably address the increased level of commuting which will occur

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Martin Harris
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH5 - Economic Development & jobs
<b>Comment</b>
Having read a lot of the information there does not appear to be any detail on how businesses would be attracted to the area, without which the development would lead to increased commuting.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Derek Hart
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 5 - Keynsham and North Keynsham Strategic Development Location (SDL)KSM4 - Link Road alignment
<b>Comment</b>
<p>KE3b " land should be removed from use for housing as Keynsham has grown and is continuing to grow far past the capacity of the existing and proposed infrastructure.</p> <p>KSM4 - North Keynsham " by Marina " Option 2a/2c is mad due to access to the HWRC on Pixash Lane " can't have more traffic down there as would impact access to the HRWC which often queues on that road. If you added more traffic to that road then it would be delayed so would all traffic going to the HWRC</p> <p>Support 3a / 3c with junction going to A1475 and new junction east of Broadleaze Nursery.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Derek Hart
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 5 - Keynsham and North Keynsham Strategic Development Location (SDL)KSM9 - Avon Valley Adventure and Wildlife Park
<b>Comment</b>
KSM9 “ support move of Avon Valley Adventure & Wildlife Park “ would reduce noise impact and traffic impact upon existing residents in Keynsham.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Derek Hart
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH1 - Strategic Planning Framework
<b>Comment</b>
Support Option 1 extending Bristol by infilling greenbelt. This is a lesser evil than creating new whole villages elsewhere.



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Derek Hart
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH3a - Development sub-options
<b>Comment</b>
WCH3 “ do not support new village. This is a greater evil than creating a new whole villages elsewhere. This accepts the need for additional properties, but location is key.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Derek Hart
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH11 - Relocation of Brislington Park & Ride
<b>Comment</b>
<p>WCH11 “ It is simply a mad proposal to relocate the Park and Ride to Hicks Gate. I object strongly. Traffic at Hicks Gate is already awful “ if a link to the South Bristol Ring Road (New Orbital Link / Multi Modal Link) proceeds this would be made even worse.</p> <p>If you add the link road to the Park &amp; Ride Move this would make it 10 times worse “ when it is already horrendous.</p> <p>Clearly the authors of these proposals do not cross this area on a daily basis.</p> <p>If you are going to do the link road, don’t move the park and ride.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Derek Hart
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
Any other comments
<b>Comment</b>
<p>I feel the way you have made people respond has discouraged people from contributing.</p> <p>You should make it easier for people not harder and more long winded.</p> <p>If you only had to enter your details once, then add comments section by section it would feel like you wanted more contributions.</p> <p>The way you present it makes people feel that the democratic process is being hijacked.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Barrie Hartshorne
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH2 - Whitchurch SDL Garden City Principles
<b>Comment</b>
<p>I am sorry to say that the last consultation at the village hall, was just a joke ! The staff seem unable to provide any details of the plan, They were not aware of any facts about the new road that was about to cut across some of the best green field assets this area has!! .</p> <p>The gentlemen who was displaying the road plan was unable to give any details of road size , 2 lane road , by pass , four lane motorway , but could say it would come out on to a small road through a large housing estate next to a primary school maybe!! His word not mine.</p> <p>This has be the worst consultation that Banes have run!! The local people were told nothing about this disaster of plan that is being dumped on the people of this area .</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr. Christopher Harwood
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 8 - Development Management policiesDM10 - Housing in Green Belt Villages
<b>Comment</b>
<p>Please find my views on the BANES Local Neighborhood plan 2016-2036 for WRITHLINGTON proposal of suitable land off of Manor Road ( RAD26 and RAD25)</p> <p>I would like this to be removed from the plan because:</p> <ol style="list-style-type: none"><li>1) The infrastructure will not accommodate such a development.</li><li>2) The land proposed is Green Belt and against BANES Green Infrastructure policy.</li><li>3) The area is not serviced on a local bus route.</li><li>4) Access &amp; Egress from the site would be on a very busy main road.</li><li>5) There are other more suitable Brownfield sites available, ie, Welton Bag site, The old St Nicholas school site, Ryman Engineering site.</li><li>6) In inclement weather Church hill and Green Parlour Road becomes a torrent of water and the proposal to mitigate water run off in the new development would not solve this.</li><li>7) Although not sure believe the water supply is fed from a reservoir at Ammerdown and feel this proposed development would put pressure on the supply system.</li></ol> <p>I make these views not as a NIMBY, but my concern that the proposed development would remove the village identity.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Gurmeet Hector
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
<p>We are opposed to the plans of making Maggs Lane a two way road to increase the flow of traffic on to Whitchurch Lane.</p> <p>Whitchurch Lane already has very large volumes of traffic, it is constantly busy and it is very difficult to pull onto the road from side roads presently let alone if the volume of traffic increased further. The road surface is already worn and the increase of traffic will cause more noise pollution and bad air quality. Plus the increased risk of traffic collision due to the poor infrastructure around Whitchurch Lane.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Miss. Jill Herrett
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
<p>B&amp;NES will know only too well how upset residents in this area are with the ongoing 'take-over' of student houses, forcing people to move away from Bath due to unkempt properties, litter, noise, lack of parking space, and no concern for resident neighbours. Oldfield Park has suffered greatly and although West Avenue is not the worst, we still have some issues - one not long ago up Cynthia Road area where drunk students were found even naked and drinking on the kerbside .. when a long term resident spoke to them they replied they could do what they wanted as it was not very late. How many more years do we have to hear about planned restriction, when the only accommodation should be on campus. Also recent development around the Lower Bristol Road and Riverside areas are ugly and not in keeping with a World Heritage City ... and block previous views across to the other side of the river. Very frustrating, especially as HMO owners don't pay Business or Council Tax .. which would help the Council with their lack of funding!</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	mrs lucy heybyrne
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>	
CHAPTER 3 - Spatial Strategy including the rural areasSS2 - the Green Belt	More dispersed approach avoiding
<b>Comment</b>	
<p>Temple cloud and Clutton simply cannot take 200 more houses. The a37 is heavily congested through temple cloud due to the narrowing of the road. It is not a nice or safe environment to walk alongside the a37 due to the heavy goods vehicles and the narrowness of the pavement. Any development which was on the opposite side of the a37 to the school would put even more young lives at risk. The walk to school is not possible for young children due to crossing the a37 so many parents drive their children to school despite living less than half a mile away. How can Temple Cloud be suggested as an option when we currently have air quality management zones due to the congestion? I would oppose any development near to the a37 in pensford, clutton or temple cloud due to congestion and narrowing of road.</p> <p>The schools do not have enough capacity to host more children. The Doctors surgery is at it's limit. There are no shops, only a garage in Temple Cloud.</p> <p>Temple Cloud and Clutton have seen lots of development over the last 3 years, more than enough. We are a village not a town like Midosmer Norton or Radstock which has many, many more facilities than rural villages. There is not even a bus which I could get to Bath on and yet I am supposed to be part of B&amp;NES!</p> <p>Of particular concern to me is the suggestion that a field leading off of Paulmont Rise in TC is being considered. It has mine shafts in it, is prone to flooding, is sloping and steep and is part of the beautiful countryside we have left to look at in Temple Cloud. Access into the field would be difficult due to a narrow farmers track at the end of a cul-de-sac being the only access. This field is on the opposite side of the a37 to the school so it would mean more crossing of the road and more traffic pulling out onto the a37. I note in the report it says access to school no problem from this site, this would make me think whoever wrote the report did not see the site. It's the furthest site from the school, with a need to cross the a37.</p> <p>Please consider very carefully any further development in these 2 beautiful villages. All current villagers would be strongly opposed.</p>	



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Kim Hicks
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
Any other comments
<b>Comment</b>
<p>Dear Sir/Madam,</p> <p>I have just been made aware of the proposed new road that will join up the A4174 at the A4 Hicks Gate roundabout with the A37 Wells Road south of Whitchurch village - and then continue round to connect up with Whitchurch Lane in Hengrove.</p> <p>I understand that the idea has already been agreed in principle by both Bath and North East Somerset Council and Bristol City Council through a long-term planning document called the Regional Spatial Strategy.</p> <p>I am VERY concerned about the lack of information about the scheme. What's more, I am shocked to hear that a new road will end at Ridgeway Lane/Whitchurch lane junction, spewing additional traffic onto Whitchurch lane. At this point the road is a 20 mile an hour zone, has a vehicle weight restriction AND is right next to a Junior School! The area is already chaos at school times!</p> <ol style="list-style-type: none"><li>1. What information is there regarding Whitchurch Lane, when it becomes part of the Orbital Highway link? Is it available, if so where?</li><li>2. How has this been communicated to the surrounding residents?</li><li>3. Are you already, or could you look into, how this will affect the residents of Whitchurch Lane and surrounding roads.</li></ol> <p>I 100% OBJECT TO YOU BUILDING A NEW ROAD TO DIVERT ADDITIONAL TRAFFIC INTO A RESIDENTIAL AREA WITHOUT ANY PREPARATION THOUGHT OR CARE FOR THE LOCAL RESIDENTS</p> <p>I look forward to hearing from you with your response to the points above.</p> <p>Reference: <a href="https://www.bristolpost.co.uk/news/bristol-news/whitchurch-hengrove-ring-road-development-2236722">https://www.bristolpost.co.uk/news/bristol-news/whitchurch-hengrove-ring-road-development-2236722</a></p> <p>With regards</p> <p>Kim Hicks 61 Ridgeway lane Whitchurch Bristol</p>

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**Representations received online:**

BS14 9PN

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Jonathan Hill
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
<p>I am registering my objections to the proposed Orbital Link road intended to join Hicks Gate to the A37 at Whitchurch Village.</p> <ol style="list-style-type: none"><li>1. Loss of the green belt is unacceptable and inexcusable.</li><li>2. The route is far too close to current housing</li><li>3. The route will cause excessive noise and is intrusive to current housing</li><li>4. The route will cause excessive pollution to current housing, there is no thought to "green" transport issues and the need for sustainable, affordable and improved public transport</li><li>5. The route is poorly planned and has no ability for traffic to flow, the A37 is already stationary even with relatively low traffic numbers, funneling excessive traffic from Hicks Gate WILL block the orbital road, Stockwood, Whitchurch and the surrounding vilages, adding a further 2500 houses to Whitchurch Village and the proposed major expansion to Bristol Airport will bring chaos to the whole district.</li><li>6. When the orbital road is stationary every route in Stockwood and Whitchurch will become dangerous "rat runs" for vehicles trying to avoid the traffic build up, this is inevitable when you design a road that funnels high volumes of traffic into a dead end.</li><li>7. The orbital road and proposed housing development will not bring any economic or other benefit to the ward of Stockwood.</li></ol>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr. paul hodgkinson
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH1 - Strategic Planning Framework
<b>Comment</b>
I am apposed to redefining he green belt and building upon it. The green belt is in place to prevent urban sprawl, protect wildlife and to prevent increased car use. According to the plan "It is about achieving changes that addresses some of our most pressing needs; enabling a shift to more sustainable modes of travel and responding to climate change'. I believe that by building on the green belt and creating the south west orbital road that this would in fact be counter productive towards achieving these aims. It will actually result in less biodiversity, more car use and increased carbon emissions.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Guy Hodgson
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Guy Hodgson
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
<p>Just a few general thoughts on the plans for Bath:</p> <p>An eastern park and ride is needed. We should look to build this on one carriageway of the Batheaston By-Pass, which appears to generally be running well below capacity to me.</p> <p>As we require less and less long term parking in Bath City Centre, we could use this land for self-builders wanting to create affordable low impact car free communities. Some of these properties could be kept as affordable rentals in perpetuity, for instance by putting them into a Community Land Trust.</p> <p>I absolutely support insisting all further student accommodations is contained within the campuses. The city has taken on as much as we comfortably can.</p> <p>I think the local taxation of second homes need to be addressed, particularly when the whole property is used as a short term holiday let. Homes are being used as businesses whilst we have many homeless in Bath and thousands on the housing list.</p> <p>Parking spaces needs to be capped at today's levels, then slowly decreased over time. Large new developments should be parking free- the Aoex hotel is a good president for this approach.</p> <p>A work place parking levy should be introduced and applied rigerously to the dozens of small pockets of land we have in the city centre used for nothing but parking spaces. It is a terrible waste of space when housing is required.</p> <p>Student HMOs should be heavily discouraged from bringing cars into Bath. Perhaps having Â£500/yr parking permits for these would help.</p> <p>If the household waste centre is being redesigned it should be of a groundbreaking approach and follow the waste heirarchy (reduce, reuse, recycle, compost, landfill/incinerate). When people arrive they should go on a 'journey' through that heirarchy- first they drop off anything reuseable at a resale centre. Then they arrive in the recycling/compost area with knowledgeable staff on site. Then finally a landfill/incineration area where you have to tip out your resdiule waste onto a conveyor belt that is constantly monitored by staff before it goes into the skip. No more tossing whatever you want in annonymous black bags into a skip which costs a fortune to empty.</p> <p>I note Radstock and surrounds will receive many more houses. Given how many people will and to</p>

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live in Bath, I wonder if we should be looking at a park and ride facility in that area rather than everyone going to Odd Down.

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**Representations received online:**

**Respondent**

<b>Name</b>	Mr Clive Honeychurch
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 5 - Keynsham and North Keynsham Strategic Development Location (SDL)KSM11 - Other comments on Chapter 5
<b>Comment</b>
<p>KSM1  It is difficult to comment on one particular strategy because all the strategies interact due to Keynsham's unique location, geography, layout, logistics and infrastructure. Each of the individual strategies must combine to form an overall cohesive strategy for the whole of the Keynsham Neighbourhood Development area, which comprises the 3 electoral wards of Keynsham North, Keynsham East and Keynsham South. Objections and comments associated with this section are therefore included within objections and comments within KSM11 and WCH12. KSM11 also contains additional material that support the comments and objections contained within it.</p> <p>KSM2  It is difficult to comment on one particular strategy because all the strategies interact due to Keynsham's unique location, geography, layout, logistics and infrastructure. Each of the individual strategies must combine to form an overall cohesive strategy for the whole of the Keynsham Neighbourhood Development area, which comprises the 3 electoral wards of Keynsham North, Keynsham East and Keynsham South. Objections and comments associated with this section are therefore included within objections and comments within KSM11 and WCH12. KSM11 also contains additional material that support the comments and objections contained within it.</p> <p>KSM4  Diagram 25 - Options for North Keynsham Link Road very misleading. Unable to be sure of interpretation. Needs to be shown as 4 separate options. It is essential that ALL connection onto both A4 and A4175 is by roundabouts rather than sets of traffic lights that will cause queues 24/7. The eastern connection onto A4 seems much better than Pixash Lane. Whatever is decided for the connection onto the A4175 it should involve a roundabout at the junction with Avon Mill Lane as there already 2 sets of traffic lights close together on Keynsham Road for Somerdale and Keynsham Station pedestrians. It depends on the volume of diverted traffic but it looks like the Roseneath house connection to the A4175 is the better one. There should at least be a footpath through the former papermill site to allow a pedestrian route to Keynsham Station.  Diagram 37 offers the best route for the North Keynsham link road being located close to and parallel to the railway line, as it is the best option for Keynsham as a whole in terms of traffic relief. The associated cycle and pedestrian routes should be on the north side so that there is minimal number of times for traffic and active travel routes to cross each other along the length of the link road. The new link road should feature a bus pull-in on either side of it roughly opposite Pixash Lane. Within the new housing development there should be a speed limit of 20 mph and segregation of well-lit routes for vehicles, cyclists and pedestrians with the minimum number of crossings for vehicles and</p>



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**Representations received online:**

active travellers.

It is difficult to comment on one particular strategy because all the strategies interact due to Keynsham's unique location, geography, layout, logistics and infrastructure. Each of the individual strategies must combine to form an overall cohesive strategy for the whole of the Keynsham Neighbourhood Development area, which comprises the 3 electoral wards of Keynsham North, Keynsham East and Keynsham South. Objections and comments associated with this section are therefore included within objections and comments within KSM11 and WCH12. KSM11 also contains additional material that support the comments and objections contained within it.

KSM11

This section contains objections and comments associated with KSM1, KSM2, KSM4, WCH7, WCH11 and WCH12

The following is a list of objections where the B&NES Local Plan fail to address the issues affecting residents of the 3 electoral wards of Keynsham North, Keynsham East and Keynsham South.

Objection 1. Keynsham's electoral wards border not only on the rest of the B&NES area but also directly with both Bristol and South Gloucestershire. It currently contains the trunk road A4 (Bristol to Bath) and its trunk connection to the A4174 ring road into South Gloucestershire. B&NES Local Plan fails to recognise that small miscalculations of the effects of macro scale changes elsewhere (including those out of B&NES jurisdiction) can have massive impact on parts of vital infrastructure within small areas of local Neighbourhood Development Plans (e.g. central and other parts of Keynsham). The combined effects of the Local and WECA Plans will lead to increased congestion and inadequate parking and thus change Keynsham's historic market town character. This will not only damage the economic viability of the town but also its central social structure including the library, leisure centre, park, cafes, and a multitude of places where people can meet and interact. This objection is inherent within all the following objections.

Objection 2. Given Keynsham's unique location, geography, layout, logistics and infrastructure, it is unrealistic to expect that sufficient people will walk, cycle or use public transport to meet B&NES objective for Keynsham's population to increase by over 30%, but its total traffic to reduce below current levels.

Objection 3. B&NES Local Plan makes no provisions for additional off-street public car parking. B&NES last official car park survey was carried out in March 2015 and showed 18% (short stay) and 12% (long stay) spare capacity at peak demand times. A local survey, meticulously carried out by myself and easily replicated, indicates that current capacity is exceeded. If people can't park, they can often easily go elsewhere to shop and engage in social activities, and this is almost certainly already happening.

Objection 4. To permit development in North Keynsham, a relief road will be established between A4 (toward Saltford) and Keynsham Road (toward Willsbridge). Any relief will be swiftly negated by constructing 1,400 homes along it and thus put additional traffic burdens on the A4 and Keynsham Rd.

Objection 5. Non-residential through-traffic is currently using Keynsham's 5 already congested arterial roads leading to the town centre as short cuts to avoid congestion associated with the trunk roads A4 and A4174 (ring). This will be exacerbated by a massive increase in planned house building around the south of Bristol and in South Glos, to which should be added proposed development in Brislington, Whitchurch and the rest of B&NES.

Objection 6. The B&NES Local Plan includes an orbital link road between Hicks Gate and Whitchurch with vague but very complex junctions at both ends. If any inhabitants of the 2,500 new homes at Whitchurch have difficulty with using the new orbital link, getting to the park and ride, Metrobus or other bus routes, they will almost certainly drive via Charlton Road into Keynsham adding to non-residential through-traffic.

Objection 7. Due to financial constraints B&NES planners will probably go for minimal infrastructure schemes with worst outcomes for Keynsham residents: and most difficult to change later. There is

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**Representations received online:**

also the question of the accuracy of the traffic flow predictions generally (See objection 8. Option 3C for the North Keynsham relief road is most likely to be effective but is unlikely to be adopted on cost grounds. There is no mentioning of systematically phasing in schemes and conducting ongoing monitoring to verify that planned infrastructure support is actually functioning in the manner intended.

Objection 8. The data used in planning the Hicks Gate roundabout is questionable. I do not feel confident that using studies using a baseline year of 2011 and comprising one day's observations will reflect accurately the subsequent traffic developments. Data on through-traffic is based on a survey carried out in July 2016 (a time of year when traffic is light as many working people without school aged children will be away on holiday). For the efficient operation of this junction a single lane in each direction (ring) north-south flyover would seem to be an option that has not been considered. This would segregate smooth orbital movement across the A4 congestion towards Bristol and the capacity of the flyover doubled later if necessary. This applies also to the A37 "ring junction. This objection should also be read in conjunction with objections 5 and 6.

Comment 1. Because there is little scope for carbon reduction through active travel and the use of public transport, greater emphasis should be given to offsetting emissions through the use of renewable energy sources such as installation of solar panels on homes and high levels of insulation.

Comment 2. Electricity should not be used as a direct method of heating premises until all requirements for lighting, motive power (e.g. vehicles and industrial processes), electrolysis and electronics etc. can be met within (say) a 10-year time frame by the use of renewable electrical generation. Until this time high efficiency gas boilers give conversion efficiencies of over 90% to usable heat. This is far more energy efficient than burning gas (at low efficiencies) in power stations to produce electricity and then wasting it on heating.

Comment 3. Consideration should be given to a rail station site on the EASTERN side of Salford to take Bristol bound commuters off the A4 through the village. Although the expense would be high and getting all the necessary cooperation difficult, this would have a big impact both on A4 traffic through Salford, Hicks Gate and Bristol.

Further comments and evidence supporting the above objections and comments are contained in the following attached documents:

BLP Jan 09 Keynsham's limited modes of travel CH.pdf

Keynsham Off\_Street Parking\_Survey\_Feb 2017\_Mar 2018 CH Final.pdf

BLP Jan09 Keynsham parking and through traffic.pdf

WCH7 See comments in KSM11 because the suggested options 1A and 2A on pages 105 and 106 include provisions for transport connections and park and ride at Whitchurch that have major implications for traffic in Keynsham. Objections and comments associated with this section are therefore included within objections and comments within KSM11 and WCH12. KSM11 also contains additional material that support the comments and objections contained within it.

WCH11 See comments in KSM11 because implications for the Brislington Park and Ride and the Hicks Gate junction will have a major impact on traffic flows in Keynsham. Objections and comments associated with this section are therefore included within objections and comments within KSM11 and WCH12. KSM11 also contains additional material that support the comments and objections contained within it.

WCH12 If objections to the B&NES Local Plan are upheld and the development at Whitchurch does not go ahead as envisaged within it; then any development associated with Whitchurch should not be relocated to Keynsham. It should be relocated in such a manner that it will not put additional stress on the A4 Bristol "Bath corridor between the Bristol boundary and the A4/ A39 roundabout, and furthermore should not in any way increase the level of through-travel which simply uses Keynsham as a short cut to reduce journey times.

Objections and comments associated with this section are therefore included within objections and comments within KSM11. KSM11 also contains additional material that support the comments and

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**Representations received online:**

objections contained within it.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Clive Honeychurch
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 5 - Keynsham and North Keynsham Strategic Development Location (SDL)KSM11 - Other comments on Chapter 5
<b>Comment</b>
<p>I have had difficulties with my internet connection and I am not sure how much you have received of previous attempts at communication including attachments. I am therefore sending supporting documents by separate email to:Planning Policy Team - local_plan2@bathnes.gov.uk</p> <p>KSM11</p> <p>This section contains objections and comments associated with KSM1, KSM2, KSM4, WCH7, WCH11 and WCH12</p> <p>The following is a list of objections where the B&amp;NES Local Plan fail to address the issues affecting residents of the 3 electoral wards of Keynsham North, Keynsham East and Keynsham South.</p> <p>Objection 1. Keynsham’s electoral wards border not only on the rest of the B&amp;NES area but also directly with both Bristol and South Gloucestershire. It currently contains the trunk road A4 (Bristol to Bath) and its trunk connection to the A4174 ring road into South Gloucestershire. B&amp;NES Local Plan fails to recognise that small miscalculations of the effects of macro scale changes elsewhere (including those out of B&amp;NES jurisdiction) can have massive impact on parts of vital infrastructure within small areas of local Neighbourhood Development Plans (e.g. central and other parts of Keynsham). The combined effects of the Local and WECA Plans will lead to increased congestion and inadequate parking and thus change Keynsham’s historic market town character. This will not only damage the economic viability of the town but also its central social structure including the library, leisure centre, park, cafes, and a multitude of places where people can meet and interact. This objection is inherent within all the following objections.</p> <p>Objection 2. Given Keynsham’s unique location, geography, layout, logistics and infrastructure, it is unrealistic to expect that sufficient people will walk, cycle or use public transport to meet B&amp;NES objective for Keynsham’s population to increase by over 30%, but its total traffic to reduce below current levels.</p> <p>Objection 3. B&amp;NES Local Plan makes no provisions for additional off-street public car parking. B&amp;NES last official car park survey was carried out in March 2015 and showed 18% (short stay) and 12% (long stay) spare capacity at peak demand times. A local survey, meticulously carried out by myself and easily replicated, indicates that current capacity is exceeded. If people can’t park, they can often easily go elsewhere to shop and engage in social activities, and this is almost certainly already happening.</p> <p>Objection 4. To permit development in North Keynsham, a relief road will be established between A4 (toward Saltford) and Keynsham Road (toward Willsbridge). Any relief will be swiftly negated by constructing 1,400 homes along it and thus put additional traffic burdens on the A4 and Keynsham Rd.</p> <p>Objection 5. Non-residential through-traffic is currently using Keynsham’s 5 already congested</p>

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**Representations received online:**

arterial roads leading to the town centre as short cuts to avoid congestion associated with the trunk roads A4 and A4174 (ring). This will be exacerbated by a massive increase in planned house building around the south of Bristol and in South Glos, to which should be added proposed development in Brislington, Whitchurch and the rest of B&NES.

Objection 6. The B&NES Local Plan includes an orbital link road between Hicks Gate and Whitchurch with vague but very complex junctions at both ends. If any inhabitants of the 2,500 new homes at Whitchurch have difficulty with using the new orbital link, getting to the park and ride, Metrobus or other bus routes, they will almost certainly drive via Charlton Road into Keynsham adding to non-residential through-traffic.

Objection 7. Due to financial constraints B&NES planners will probably go for minimal infrastructure schemes with worst outcomes for Keynsham residents: and most difficult to change later. There is also the question of the accuracy of the traffic flow predictions generally (See objection 8. Option 3C for the North Keynsham relief road is most likely to be effective but is unlikely to be adopted on cost grounds. There is no mentioning of systematically phasing in schemes and conducting ongoing monitoring to verify that planned infrastructure support is actually functioning in the manner intended.

Objection 8. The data used in planning the Hicks Gate roundabout is questionable. I do not feel confident that using studies using a baseline year of 2011 and comprising one day's observations will reflect accurately the subsequent traffic developments. Data on through-traffic is based on a survey carried out in July 2016 (a time of year when traffic is light as many working people without school aged children will be away on holiday). For the efficient operation of this junction a single lane in each direction (ring) north-south flyover would seem to be an option that has not been considered. This would segregate smooth orbital movement across the A4 congestion towards Bristol and the capacity of the flyover doubled later if necessary. This applies also to the A37 "ring" junction. This objection should also be read in conjunction with objections 5 and 6.

Comment 1. Because there is little scope for carbon reduction through active travel and the use of public transport, greater emphasis should be given to offsetting emissions through the use of renewable energy sources such as installation of solar panels on homes and high levels of insulation.

Comment 2. Electricity should not be used as a direct method of heating premises until all requirements for lighting, motive power (e.g. vehicles and industrial processes), electrolysis and electronics etc. can be met within (say) a 10-year time frame by the use of renewable electrical generation. Until this time high efficiency gas boilers give conversion efficiencies of over 90% to usable heat. This is far more energy efficient than burning gas (at low efficiencies) in power stations to produce electricity and then wasting it on heating.

Comment 3. Consideration should be given to a rail station site on the EASTERN side of Saltford to take Bristol bound commuters off the A4 through the village. Although the expense would be high and getting all the necessary cooperation difficult, this would have a big impact both on A4 traffic through Saltford, Hicks Gate and Bristol.

Further comments and evidence supporting the above objections and comments are contained in the following documents sent by email to [planning policy team/local\\_plan2@bathnes.gov.uk](mailto:planning_policy_team/local_plan2@bathnes.gov.uk)

BLP Jan 09 Keynsham's limited modes of travel CH.pdf

Keynsham Off\_Street Parking\_Survey\_Feb 2017\_Mar 2018 CH Final.pdf

BLP Jan09 Keynsham parking and through traffic.pdf

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Kathleen Hovland
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 5 - Keynsham and North Keynsham Strategic Development Location (SDL)KSM11 - Other comments on Chapter 5
<b>Comment</b>
<p>DM1 Carbon reduction. An area of green land and trees is a carbon sink. Removal of this land for housing development will remove any possibility of zero carbon development. The proposal for an enlarged junction at Hicks Gate, incorporating an increased number of arterial roads, with new housing aligned, will generate high levels of pollution. However, cycle lanes should be incorporated in all planning for all new roads. Mitigation could take the form of protecting green land, planting a woodland and hedgerows. The proposal to build new housing in alignment will also increase the level of carbon pollution and there will be an increasing failure to meet government targets. DM2 Many sustainable solutions for transport are being overlooked and there is no planning proposed: Keynsham Energy group has identified a site for wind energy development. BANES Planning should incorporate this in development plans, promote feasibility studies and support a community initiative for this development. DM9 Brownfield site should be registered and developed as an alternative to safeguarded land. Rural character and the identity and local environment distinctiveness of green boundary areas should be protected.</p> <p>The mitigating effect will be lost if these sites are removed for development and the loss of carbon sink, wildlife habitat, particularly the land behind Minsmere Road, will contribute to failure to meet government targets. Failure to accommodate an increase in transport created by inappropriately sited new developments resulting in congestion in gridlock, kerbside pollution will damage well-being and health. DM14 Car parking should be developed as small satellite sites around the, i.e. outside the town e.g. Wells, Fowey. Easy access to the town centre for shopping and involvement in civic centre projects with adequate parking is a feature of a modern flourishing rural town centre. Small areas of brownfield or undeveloped land should be identified. Sustainable travel requires a recognition that the railway also plays a significant role in this success. I travelled to a city centre school by train and tram, a journey of more than 10 miles and it was recognised that a small local station is important for the economic viability of a semi-rural town. There is also no hotel. A hotel from a national chain, that ensures efficient, rapid, transit is vital for the modern technical and managerial workers who visit Keynsham for projects. There should also be a technical hub with hot desk working. DM16 Electric infrastructure should be included in planning. Electric charging should be available at the station car park for those who opt to include train travel to work.</p> <p>Finally and most essential planned infrastructure should be in place before any new development is built. There should be sufficient entrances and exits from all new build sites. Flood prevention and pure water policies should be adhered to following government and EU guidelines.</p>
<b>Attachments Included</b>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Joanne Hudd
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH12 - Other comments on Chapter 6
<b>Comment</b>
<p>I would like to voice my concerns regarding local plan 2016-2036</p> <p>I have lived in whitchurch for 10 years now and the attraction was its quieter and attractiveness of the location and surrounding field space these plans will ruin that and make this area become less attractive and also ruin our community whilst decreasing house values</p> <p>Our schools are very much safe at present giving us opportunity to walk with our children with a 20mph speed limit which we feel safe to be in! This will have a massive affect on the safety of our schools with a main road upto 50mph limited and even if this is decreased to 20mph around the school locations will drivers actually implicate the slower speeds on main roads?? I doubt this very much!! Plus additional traffic around these areas will not be safe for children to walk to school, walking to school is encouraged from many parties and this will just increase danger for our children who attend these schools</p> <p>I feel this decision is only happening to support Banes on building an additional 2500 homes with our area as increase in population will cause more traffic in an area which is already busy on main roads like the Wells road around peak times within the day. This decision has not been made in favour of decreasing congestion around the ring road and brislington and is given people from those areas false facts on actual reason for this to happen</p> <p>We chose to live in our area because of the beauty and less pollution and you now want to increase pollution and affect our children/ourselves and our home so you can cash in on new homes! We have recently had new homes and estates built on Staunton Lane and recently on the back of Bristol Road, more estates have been created off Wells road like Acer Village and so forth. More homes is not what is needed in this area. What is needed is to protect the green we have left and environment for our children and for those after them</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Ivan Hudd
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
<b>Comment</b>



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Ms. Amy Hughes
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 5 - Keynsham and North Keynsham Strategic Development Location (SDL)KSM5 - Pedestrian and Cycle connections
<b>Comment</b>
<p>The document is very vague about how any of these plans will integrate with central Keynsham. It is all well and good discussing creating a healthy neighbourhood in the new proposed site, but this must be extending into existing areas of Keynsham. Keynsham is currently extremely non-pedestrian friendly (as examples I would draw to your attention the lack of pedestrian crossings on Charlton and St Ladocs Roads, and the total lack of commitment to traffic speed control). This often makes walking in the town, even on key routes e.g. to the High Street and in between schools, GPs and other key services as best unpleasant and at worst dangerous. The strategy with previous developments has been very poor e.g. token cycle paths that don't go anywhere. For any of these plans for Keynsham to work, pleasant and safe pedestrian access has to be the priority, with cyclists receiving the second highest priority, and commuting traffic receiving lowest priority when considering highway strategy. This must extend throughout Keynsham; there is no point creating pockets of pedestrian and cycling access when these do not extend to the High Street and existing schools and services.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Andrew Hunt
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH4 - Housing
<b>Comment</b>
<p>The residents of Whitchurch consider the Whitchurch Village development to be unsustainable, there are more sustainable locations that should be considered. The additional traffic on Whitchurch Lane and inherent congestion and air / noise pollution will have hugely significant negative impact on residents and schools. The building of houses on green belt is unacceptable, not to mention the area is subject to flooding!</p> <p>The effect on junctions and capacity of Whitchurch Lane have not been effectively considered as part of the supporting documents and the transport studies have errors and are missing key information. It is evident that the Bristol Mayor and the road planning officers disagree with each other on infrastructure issues, the traffic officer suggests that an increase of 80% of traffic will be expected, it appears the "Mayor" didn't even know a study had been carried out!!!!</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Stephen Hyde
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS1 - Focussed approach avoiding the Green Belt
<b>Comment</b>
<p>I live on Church hill which is a narrow country lane and already hosts a rat-run between Writhlington School and Radstock to the east and the main Peasedown Bypass and Bath road to the west, residents find it extremely difficult to walk the hill because of the amount of vehicles travelling the short cut, I have attached pictures of the hill so that you might be ale to comprehend the issues that I personally would face being severely sight impaired.</p> <p>A number of planning applications have been turned down in this area because of the traffic infrastructure, for example, The Old Schoolhouse applied to build nine dwellings, it was established, even then, that the road would not accommodate a proposed 18 extra vehicles, if there are to be 160 new homes constructed directly opposite that site how are the roads expected to meet the needs of potentially 18 x18, 320 vehicles plus visitors to the area.</p> <p>These are "green fields" and Writhlington has already used much of its greenfield land on Knobsbury Lane which has increased the traffic flow to make the area between Manor road and Writhlington and St Mary's primary schools extremely dangerous, to say the least, we risk the lives of our children and grandchildren every day.</p> <p>Why is it that ruining villages such as Writhlington would be so much more beneficial than developing areas that already have derelict buildings such as that of the Bibby site at Welton which just invites infestation by rats and seagulls.</p> <p>Finally, I need to have a septic tank because there is a river that runs between my house and the water works, how would such a development cater for sewage that would be produced and the drainage, which is already a huge problem at the bottom of Church Hill.</p> <p>I also speak for the visually impaired members of our community, how would a project like this affect them in their own village, they are at a disadvantage already, to impose a completely new environment on them would lead to them being excluded from their own environment, I would ask you to consider carefully your proposal as it could lead to disaster for all residents of the Writhlington area for many years to come.</p>

**Attachments Included**

- [http://www.bathnes.gov.uk/sites/default/files/webform/044\\_1.jpg](http://www.bathnes.gov.uk/sites/default/files/webform/044_1.jpg)
- [http://www.bathnes.gov.uk/sites/default/files/webform/up\\_to\\_sept\\_2015\\_054.jpg](http://www.bathnes.gov.uk/sites/default/files/webform/up_to_sept_2015_054.jpg)
- <http://www.bathnes.gov.uk/sites/default/files/webform/051.jpg>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Janice Hyde
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS1 - Focussed approach avoiding the Green Belt
<b>Comment</b>
<p>Sirs, Re the Proposed Development of RAD26 &amp; RAD25, I want this to be stopped and these areas removed from the plan. These areas are green field sites outside of the housing development boundary, the area is full of wildlife from small voles/mice up to wild deer which I have often seen. The public foot path is used daily by old and young alike. Writhlington has already exceeded its quota for new houses in the last 18 months so no further housing should be looked at until 2029. I believe that this development would go against BAINES green infrastructure policy. The road infrastructure is already overloaded and dangerous take the time to have a look at the rd between 8.30am and 9am and again from 3.30 to 6pm you will be shocked at the amount of traffic this rd has along with many people walking. 1500 childrens lives are at risk every day using the A362 junction with Knobsbury Lane and Manor Rd. Any building work is inappropriate because there is no likelihood of effective drainage or sewage systems. We have a poor bus service to this village which means people will drive, on the lane I live on the increase in traffic will make this already overused rd which is a rat run too dangerous. In the winter this rd is lethal and we have many small accidents and any additional load would make this rd unusable. Please relook at this plan and refuse it and allow our village to keep its identity.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	MR ROYSTON JACOBS
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
I am very concerned about the proposal to direct traffic from the new Orbital Road on to Whitchurch Lane, which is a single carriageway and is struggling to cope with current traffic flows at peak times. There will also be additional traffic from the opposite direction due to the Hengrove Park housing development. I question whether adequate consideration has been given to this part of the overall strategic proposals.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Nick Jennings
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH12 - Other comments on Chapter 6
<b>Comment</b>
The Whitchurch village development proposals are unsustainable. There are more sustainable locations that should be considered. The effect of additional traffic on junctions and capacity of Whitchurch Lane have not been effectively considered. The transport studies have errors. There is no way Whitchurch Lane can cope with that amount of additional traffic on top of the traffic that will come from the Hengrove Park development.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Ms Kelly Jobes
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH1 - Strategic Planning Framework
<b>Comment</b>
<p>I would like to voice my concerns regarding local plan 2016-2036</p> <p>I have lived in whitchurch for 39years now and the attraction was its quieter and attractiveness of the location and surrounding field space these plans will ruin that and make this area become less attractive and also ruin our community whilst decreasing house values</p> <p>Our schools are very much safe at present giving us opportunity to walk with our children with a 20mph speed limit which we feel safe to be in! This will have a massive affect on the safety of our schools with a main road upto 50mph limited and even if this is decreased to 20mph around the school locations will drivers actually implicate the slower speeds on main roads?? I doubt this very much!! Plus additional traffic around these areas will not be safe for children to walk to school, walking to school is encouraged from many parties and this will just increase danger for our children who attend these schools</p> <p>I feel this decision is only happening to support Banes on building an additional 2500 homes with our area as increase in population will cause more traffic in an area which is already busy on main roads like the Wells road around peak times within the day. This decision has not been made in favour of decreasing congestion around the ring road and brislington and is given people from those areas false facts on actual reason for this to happen</p> <p>We chose to live in our area because of the beauty and less pollution and you now want to increase pollution and affect our children/ourselves and our home so you can cash in on new homes! We have recently had new homes and estates built on Staunton Lane and recently on the back of Bristol Road, more estates have been created off Wells road like Acer Village and so forth. More homes is not what is needed in this area. What is needed is to protect the green we have left and environment for our children and for those after them</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Andrew Jones
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 8 - Development Management policiesDM14 - Residential Parking Standards
<b>Comment</b>
Garages - option 2 should be adopted to exclude garages and review the number of space for different sized dwellings.  District-wide Differentiation - option 1 should be adopted to develop & define parking standards differentiated spatially across areas.



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Andrew Jones
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 8 - Development Management policiesDM15 - Defining Parking Standards
<b>Comment</b>
Define in SPD - define parking standards in a separate SPD (rather than a schedule to the new Local Plan)  Local Plan policy to refer to parking being provided in accordance with the standard defined in a SPD or a standard defined in a made Neighbourhood Plan based on robust evidence and it is consistent with the overall parking strategy. This allows local communities to deal with neighbourhood specific parking issues.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Andrew Jones
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>	
CHAPTER 8 - Development Management policiesDM17 - Management policies	Review of existing Development
<b>Comment</b>	
D2 Local Character & Distinctiveness - mentions a proposal to amend this to give greater detail on maximising densities. This should recognise that typical target densities are often not appropriate in smaller rural villages and allow target densities to be decided by reference to local parish character assessments.	
NE2 - the proposal to include AONB's in NE2 policies is supported.	

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Andrew Jones
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>	
CHAPTER 3 - Spatial Strategy including the rural areasSS1 - Green Belt	Focussed approach avoiding the
<b>Comment</b>	
SS1 is supported as the preferred approach.	
If there are insufficient outside the Green Belt, then SS3 would also be supported.	

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Patrick Keane
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
The plans for Wansdyke business park are detrimental for the local community, the area is already affected by to many transient residents staying for only a few years and there is a dearth of affordable accommodation for local residents to rent. Enforcement plans of the "no cars" policy is unrealistic and will lead to further parking problems for local residents! No furthering her student accommodation should be allowed in Oldfield park and buy to let owners encouraged to rent to locals instead of students.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Nicholas Kirk
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH12 - Other comments on Chapter 6
<b>Comment</b>
<p>As a long standing resident of the village we have seen many additional properties built within the village,at no time has the infrastructure changed.we are at saturation point with traffic,lack of shops,school places.</p> <p>What this area needs are affordable houses for the younger generation not 2500 high cost family homes.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Josie Knight
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)
<b>Comment</b>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Josie Knight
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH2 - Whitchurch SDL Garden City Principles
<b>Comment</b>
<p>Building 100s of new houses South of Whitchurch village is madness.</p> <ol style="list-style-type: none"><li>1. It is greenbelt land, other sites should be exhausted first</li><li>2. The a37 is already an overly congested route in/out of Bristol</li><li>3. There are more suitable sites with better existing transport links into Bristol (where all the employment is).</li><li>4. There are more suitable sites within Bristol with no commute e.g. the former arena site</li><li>5. Whitchurch village has already taken additional houses on the horse world site</li><li>6. Is it fair for BANES to take the Bristol housing? Surely houses should be built on Bristol council land</li><li>7. Whitchurch village will not benefit from the new facilities as they will be outside of the main village, we will only suffer the additional traffic passing our homes and our village school which doesn't even have a reduced speed limit outside of it.</li><li>8. Long Ashton has good links into Bristol, including an existing park and ride. Surely that would be a better site? Equally Brislington.</li><li>9. Pollution levels</li><li>10. Current residents in the area will have our much loved green space taken away from us.</li></ol>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Josie Knight
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
<p>The proposed connection between the ringroad and Whitchurch is ludicrous.</p> <ol style="list-style-type: none"><li>1) it will cross greenbelt the ends of people's gardens and a primary school.</li><li>2) Whitchurch lane is already incredibly congested and cannot support existing traffic, let alone more.</li><li>3) it will send more traffic down the a37, not draw it away, which again, cannot support more traffic into or out of Bristol...go to Totterdown during rush hour</li><li>4) cars will not be able to turn at calling to road...utter madness. Why block an existing route and compound the traffic issues down Whitchurch lane and a37 further?</li><li>5) is this road being proposed to be built because of proposed new houses at whitchurch or vice versa? We certainly do not need this if the houses are not built. Is that why you are pushing for the houses to be there? To get the road too?</li></ol>



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Grahame Lacey
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>	
CHAPTER 3 - Spatial Strategy including the rural areasSS1 - Green Belt	Focussed approach avoiding the
<b>Comment</b>	
As a resident of Clutton for over 20 years I would only support this proposal for housing in the village if it was very small-scale, e.g. under 15 dwellings, and if housing development was not built on amenity land. The village has recently expanded (Maynard Terrace parcel of land) and does not have the infrastructure (primary school, roads, utilities, etc.) for further development, other than minimal infill or small-scale developments.	

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Grahame Lacey
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>	
CHAPTER 3 - Spatial Strategy including the rural areasSS2 - the Green Belt	More dispersed approach avoiding
<b>Comment</b>	
SS2 I do not support this proposal as Clutton does not have the infrastructure to support many more new dwellings. Norton Radstock does have the existing infrastructure and potential sites. I believe a more focused approach to housing development would be more effective if concentrated in existing Norton-Radstock urban zone.	

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Grahame Lacey
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS3 - Combination of locations outside and within the Green Belt
<b>Comment</b>
SS3 Clutton is outside, but on the fringe of, the existing Green Belt. In this option, development in the village should only be considered as a last resort. Under previous SS2 proposal the diagram (diag. 5) if accurate, suggests the location for new housing development would be on the west side of the main A37 upper Bristol Rd. Development here, if it was a proposal, would have less impact on the general amenity of the village and the site gives easy access to Bristol & Bath for employment (car, or regular bus service to Bristol but not to Bath), etc. However, issues of capacity on existing village infrastructure would still be a major issue - primary school, utilities, additional journeys within the village centre, no medical facilities or shop, etc.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Wendy Lacey
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH12 - Other comments on Chapter 6
<b>Comment</b>
<p>I object to you taking the green belt, polluting the area with thousands of cars from the building of new houses and the ring road (which is a condition attached to the building of the new houses). There is no infrastructure in place to support the thousands of new houses proposed and it will affect the value of our property. There has already been a large number of houses built in and around the Whitchurch Village / Keynsham area over the last couple of years and the increase in traffic has been extremely noticeable.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Alyson Lampard
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
<p>YOU WILL BE AWARE THAT YOU NEED DECENT TRANSPORT LINKS ( ie a railway ) IN ORDER TO MAKE LARGE SCALE DEVELOPMENT SUSTAINABLE .Whitchurch cannot offer a railway or a river as in other areas .</p> <p>The proposed road is completely flawed .</p> <p>Cutting right across greenbelt at the perimeter of the city from Hicksgate behind Stockwood , all across greenbelt land much of which floods every winter , The biodiversity and ecology irreparably damaged . The residents of Stockwood will have their lives adversely affected by noise and pollution .</p> <p>The conservation village of Queen Charlton will be threatened . Do the residents of the new developments at Horseworld know that a new road is being considered right behind them ?</p> <p>The link up for the South Bristol orbital goes across farmland into a bottleneck and then into an established residential area with schools , shops and many pedestrians . This thoroughfare is already gridlocked at peak times , there is a 20mph speed limit reflecting the need for safety in this area .</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Alyson Lampard
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH4 - Housing
<b>Comment</b>
<p>The sheer scale of this development beggars belief . We know from our Neighbourhood plan that the majority of residents commute into or across Bristol for work . This can take anything from 60-90 minutes due to volume of commuter traffic . There are few jobs here and these people will suffer mental distress while adding 2 hours to their working day to get and from work . Pollution levels are already high - we have a high percentage of car users as we have no trains or boats to get us into the city .During the day , the development will likely represent a dormitory . Where will the facilities be for these residents ?</p> <p>Flooding really is an issue in this area - please look at the problems encountered at horseworld and the construction of a huge retention pond to contain flood water .</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Mike Landen
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH4 - Housing
<b>Comment</b>
<p>I strongly oppose the plan to build 2000 houses at Whitchurch Village for the following reasons: I note that the number of houses has been somewhat reduced from the original proposal. However building this number of houses will still destroy the character of the Village.</p> <p>The proposed housing is within the existing Green Belt, the value of which is made explicit in the Arup Report, commissioned by Bath and North East Somerset, which states: “Green Belt in the northern portion of this land parcel is of high importance on the basis that it prevents the merger of Bristol and Keynsham, while land to the west is also of particular importance for preventing the sprawl of Bristol into open countryside that could result in the coalescence of the city with the rural village of Whitchurch. The Green Belt designation within this land parcel serves the purposes of protecting the countryside from encroachment and assisting urban regeneration in south Bristol”. Although it is not be the intention at the present time to allow development of the land adjacent to the proposed road there is little doubt that, in the future, there would be huge pressure from developers to build on this land. This could make it extremely difficult to withstand further erosions of the Green Belt in the future. The boundary for the Green Belt would need to redrawn for the second in a relatively short period of time. An alternative approach would be to build a smaller number of houses in the Whitchurch area, possibly up to 600. Then use non-Green Belt in the southern area of Bath and North East Somerset to build houses in relatively smaller numbers at a number of sites. In some cases, this would mean increasing the number of houses proposed in these areas by say about 200. This would have a far less effect on local communities than building 2000 houses on the edge of one small settlement. There is the perception that Bath and North East Somerset have chosen to propose building a large proportion of the required housing as near to the Bristol boundary as possible. There are alternatives which would “spread the load” in a much fairer way and reduce the impact on the Green belt considerably.</p> <p>The infrastructure required would be equally devastating for the area. The extra traffic it would bring into the area, together with the extra traffic generated by building more houses would mean that congestion would be worse, even after spending a large amount of money. The pollution caused by roads through, and near to residential areas would be huge and its affect on young children and older people in particular would be unacceptable. It is also against the stated aims in the JSP. I have provided further evidence of the negative effects of the transport proposals in the relevant section in the response form.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Mike Landen
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
<p>Orbital Road A37 to Hicks Gate  Multimodal Claim</p> <p>The proposed road is described as a multi modal road with the claim that it will provide benefits for walking and cycling as well as providing a route for the Metrobus.</p> <p>I agree strongly with the Government view that walking and cycling routes should be provided but that does not mean that all roads are suitable for these purposes. People who walk regularly do so either for recreation or to get to work. Those who walk for recreational purposes would not generally walk along a major road with all the associated air pollution. It is hard to imagine anyone walking from their home to the start of an orbital road and then walking 4 kilometres along the road followed by a further walk to their place of work. There are very few work places near to either end of the route and none along the route. Cyclists would have such a severe climb, with an average gradient of over 4% for approximately 1.4km in the direction from Hicks Gate, that many would need to walk this section. There is ample evidence that a cycling route will only be well used if reasonably flat, such as the Bristol to Bath cycleway. I cycled to work for a number of years but would not have done so alongside this proposed road.</p> <p>A major reason given for building this road is that it is intended to be used as a route for the MetroBus. I use buses on a regular basis and I am fully supportive of improving the bus network across the area by upgrading existing services, as well as by introducing the MetroBus. The MetroBus service has only just been launched and therefore is still an untested system. It will be necessary that the routes that have been built are viable so that, when the contracts for the routes are put out to tender, the operating costs will at such a level that the companies will be able to make a profit. In order to do this there will have to be frequent, reliable and affordable services on routes that the public are able to use. I believe that the routes to Bristol city centre have a chance of being viable. It is difficult to envisage that enough people would use the part of the route between the A37 and the A4 to make it viable. As it states in Section 6.5 of the West of England Joint Transport Plan 2017: "a key risk for [MetroBus] orbital services is the potential level of subsidy required and whether there would be sufficient patronage to justify orbital services". This is a damning statement as it, together with the points I have made about cycling and walking routes undermines the concept of this being a multi-modal road.</p> <p>Junction with Orbital Road and Stockwood Lane</p> <p>On page 102 it states "A left in left out junction where the new link severs Stockwood Lane is provided to accommodate local access, whilst avoiding delay and conflicts from right turn movements." This does not appear to make any sense as traffic along Stockwood Lane not entering the Orbital Road would still need to cross the Orbital Road as would traffic from Hicks Gate travelling to Stockwood. It follows that a roundabout, traffic lights or flyover would be needed and the first two alternatives would cause delays for both traffic on the orbital Road and on Stockwood</p>



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Lane.

**Safety Issues**

The relatively steep gradient at the Hick™s Gate end of the Orbital Road is of great concern not only for cyclists who may decide to venture alongside the road but also for vehicles travelling along the road. There does not appear to be any provision for an “escape road” on the downhill section meaning that a brake failure, particularly with an HGV, would be potentially disastrous. On the uphill section many HGVs, particularly if loaded, will be very slow moving thus causing frustration for some car drivers as there appears to be no plans for a “crawler lane”. Many serious accidents are caused when car attempts to overtake and this is far more likely in a road with such a gradient. One of the reasons for the proposal to build this road being rejected some 14 years ago was the fact that the topology was not consider to be suitable for a road of this type.

**Environmental Issues**

**Green Belt**

The proposed road is within the existing Green Belt the value of which is made explicit in the Arup Report, commissioned by Bath and North East Somerset, which states: “Green Belt in the northern portion of this land parcel is of high importance on the basis that it prevents the merger of Bristol and Keynsham, while land to the west is also of particular importance for preventing the sprawl of Bristol into open countryside that could result in the coalescence of the city with the rural village of Whitchurch. The Green Belt designation within this land parcel serves the purposes of protecting the countryside from encroachment and assisting urban regeneration in south Bristol”. Although it is not be the intention at the present time to allow development of the land adjacent to the proposed road there is little doubt that, in the future, there would be huge pressure from developers to build on this land making it extremely difficult to withstand further erosion of the Green Belt in the future.

**Air Pollution**

The road would pass directly through, or close to, the planned new housing site and then to the south east of Stockwood alongside existing housing. The road to the west of the A37 would pass very close to housing on both routes, as well as along Whitchurch Lane. It is well known that the effects of air pollution that would arise from vehicles using a road of this type is hugely detrimental to the health of the people that live or work close to the road. In a recent report: Health Impacts of Air Pollution in Bristol February 2017 the following: “In March 2014 Bristol City Council published a report setting out the health impacts of air pollution in the City of Bristol. “It concluded that an additional 188 deaths of Bristol residents (over the age of 30) were attributable to air pollution in 2010 with 24 of these attributable to local road traffic emissions. This compares to an average of 9 people killed each year in road traffic collisions on roads in the City of Bristol.” It is therefore completely unacceptable to have a proposal in the Joint Spatial strategy to build a road so close to so many homes, as well as being near to schools and playing fields when there is a stated aim in the Plan of “Improved health and wellbeing outcomes”. Presumably this outcome is intended for all residents in the area covered by the Plan. The gradient issue is also relevant here as more pollutants are produced, particularly from HGVs, when ascending a gradient on a road.

**Noise Pollution**

This issue, whilst possibly not being as serious as air pollution as far as health is concerned, will have a large detrimental effect on some residents. The reference that Stockwood Lane may benefit from a reduction in traffic is nonsense because access to Stockwood would be made easier from the east leading to more traffic not less. The present problems along Stockwood Lane are cars travelling too fast often well above the speed limit apparently with impunity.

It is noted that mitigation for both air and noise pollution have not even been considered at this stage so presumably were not allowed for in the costing exercise.

**Light pollution**

If the walk/cycle lane was to be included there is a statement suggesting it might have to be lit and this would cause some light pollution. If all the road were to be lit then the pollution would be much

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greater.

#### Biodiversity

A number of issues are identified. This includes the impact on Special Areas of Conservation for Bats for which there is a Granted European Protected Species Application within 1km of the scheme.

There will be a loss of deciduous

woodland, hedgerows and agricultural habitats and a loss of trees, hedgerow, grassland, scrub habitats and ponds which will have a huge effect on local wildlife.

It is a disgrace that this described as having a slight adverse impact, followed by "replant hedgerows lost" in mitigation. This appears to have been written by someone with little knowledge of habitats. As with other issues there appears to be no cost attached to this.

#### Water Environment

This is recognised as a serious issue and that considerable mitigation measures will be required. As seems to be usual it does not appear that any potential costs have been attached to this and this is the sort of unquantified expense that that leads to an outturn cost higher than the budget.

#### Pipelines

The road would have to cross some pipelines which would incur further costs.

#### Contribution to JLTP Objectives - Orbital Route A37 to A4

The first objective to reduce Carbon emissions is "neutral". It also states that "the scheme increases highway capacity and therefore there is a risk of travel demand increasing to meet the new capacity." The evidence is from similar schemes that this is very likely to happen, leading to this project having an adverse effect on this JLTP objective. The risk identified in the first objective is also likely to impinge on the for second objective as it would mean journey times would not be decreased and also on the third objective as roads in the surrounding area would not see reduced traffic. This travel demand risk is virtually certain to happen at peak flow times. The fourth objective of promoting accessibility to current settlements will not be achieved if 2000+ new homes are built in the Whitchurch area. It therefore appears that the road would contribute very little to the JLTP objectives at best and there is a high risk that it would have an adverse effect on these objectives. Little wonder then that this is part of the scheme is described as having "low value". The combined scheme fares a little better but the overall contribution is still unacceptable and the travel demand risks still applies.

#### Social Impacts

The positive effects have been exaggerated. The physical activity objective is flawed as it appears to be contradictory to the concept of a multimodal road. It states that "it may be that the most appropriate route(s) is not adjacent to the link road but on local roads in Stockwood." Perhaps it means some people may start their journey in Stockwood but it is not clear. In any case I have given reasons as to why a cycle/walk lane is unlikely to be justified earlier in my response. The claims for the accident objective are very subjective, particularly bearing in mind the risks of accidents on the Orbital Road that I made earlier and it also assumes less traffic on local roads. On a road of this type it is often the case that traffic on neighbouring roads is not reduced and may even be increased. Any accident on the Orbital Road with the proposed 50 mph limit is likely to be more serious than that on a 30mph road. So overall the social benefits are likely to be slightly beneficial at best.

#### Conclusion

The two major transport infrastructure projects planned for the Bristol/Bath area have been a financial disaster. The electrification of the rail line between Wootton Bassett junction and Bristol Temple Meads has been cancelled, or postponed indefinitely. This is in spite millions of pounds having already been spent on lowering the Box tunnel and other work on bridges in the Keynsham area. The building of the South Bristol Link Road and Metro Scheme has an overspend of approximately £10 million, of which Bristol City Council is responsible for £6.8 million. As I understand it this will be mainly be funded by borrowing that will cost Bristol Council tax payers £400 000 per year for 25 years. The South Bristol Link Road for which funds were attracted by

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stating that it would provide a route for the Metrobus is not being used for this purpose, although millions were spent so that the road could accommodate the Metrobus. As the MP for Bristol South, Karin Smyth said in April 2018 residents were deceived as to one of the major reasons for justifying the road as nothing was stated in the planning documentation that residents were asked to comment on, that the Metrobus would not run until 2000 more houses were built.

In view of all the financial risks involved as well as the lack of evidence that the proposed road would improve traffic flow, together with all the environmental and technical issues this road should not be built. There are a large number of other risks associated with this project only some of which are listed in Table 6-11. There is no hard evidence that the proposal to build it would bring the benefits that justify the cost and there would be many negative outcomes, some of which are in direct contradiction with the aims of the Joint Spatial Strategy Plan. The relatively steep gradient along part of the proposed road would cause significant engineering problems as well as preventing the smooth flow of traffic along the road and it would impact on safety issues. The road would attract extra traffic into the area leading to serious congestion problem at both ends of the road at least at peak flow times. The large amount of money which would be well over £125 million should be spent on a transport project that fits better with the aims of the Joint Spatial Strategy Plan. Some ideas are included in the appropriate section on this form. The arguments for this road with all the risks attached is insufficient to include in future plans.

New road to link the A37 to the South Bristol Link Road

When I first read about this proposal, with the two alternative routes I found it hard to believe. The idea is plainly non-sensical as it would not be fit for purpose. The environmental and social issues that I have identified in my response to the A37 "Hicks Gate proposal above also apply to this section. There is also the major issue of the water environment with both routes. On page 121 it states "Overall, excluding mitigation, the scheme is considered to have a significant adverse impact on the water environment as it has the potential to increase flood risk to residential and commercial properties, and impact water quality." The mitigation for this is extremely vague and without any of what the cost might be. How a project has got this far without any clear plan for ensure that this is no adverse effect if the road was built, including the threat to water quality cannot be justified. On this criterion alone both these routes should be abandoned.

The plan does not address the issue of attempting to link either of these routes to the South Bristol Link Road via Whitchurch Lane. On Page 33 it states "There is also a strong orbital flow to the west to south Bristol and Clevedon, likely requiring routing via Ridgeway Lane and Whitchurch Lane which are not designed for large commuter movements and on page 81 "Careful consideration [is] required of how Whitchurch Lane will be impacted by this". There is no indication of how Whitchurch Lane would be modified if was to become part of an orbital route and therefore no costs attached to this. I can answer the question of how the residents of Whitchurch would be impacted by this: it would be devastating in terms of pollution and the severance of the community. It could never fulfil the function of an orbital road. There are too many junctions and there would need to be too many pedestrian crossing places. There is also the problem of safety with a primary school next to the route, as well as people needing to access local services.

The fact that the Bishport Avenue Route has been rejected suggests that this idea smacks of desperation and, as it is completely flawed on a number of counts, it must be deleted from any plans immediately.

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**Respondent**

<b>Name</b>	Mr John Lane
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 5 - Keynsham and North Keynsham Strategic Development Location (SDL)KSM2 - Review of existing Keynsham policies
<b>Comment</b>
<p>I cannot see how the current growing congestion and resulting pollution in parts of `Keynsham will be helped, rather than be made a lot worse with the proposed developments. These will inevitably bring more cross town traffic, of all kinds, through and across the town. This, as at present, being largely due to the availability of the only river crossing between Bristol and `Bath and the need to access the Bristol ring road. Improved rail services will also lead to more traffic flow to take advantage of this provision. The rail provision will also lead to further demand on a very limited car parking space. The suggestion of a park and ride facility might reduce some demand, and bring other benefits, but where are these to be positioned. To be useful any system needs to be near points of demand if further traffic is not to be encouraged. Added to all of the earlier comments a significant population of the town are pensioners often with limited mobility who need easy access to shops, services, Doctors etc. etc. Often their only option is to use a car. It is true that a circulatory bus service would help but could it cover all sections of the town?</p>

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**Respondent**

<b>Name</b>	Mr Peter Leonard
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH1 - Strategic Planning Framework
<b>Comment</b>
<p>Your proposal of a main road taking traffic from the A37 Wells Road into Stoneberry / Halfacre is the most ridiculous of ideas. You are considering the option of bringing the traffic into a residential area where you are proposing to bring the route directly alongside a local school. The current traffic calming measures in place are to somehow compliment the 20 MPH zone and yet we have had several incidents where the build outs have caused numerous accidents already. The thought of increasing the traffic in this area is absurd. You will cause major gridlock to an already busy route onto Whitchurch Lane. There is no possible need for this road, the road brings traffic to a housing estate and worse still onto a local school. The traffic will create noise pollution and above all will be dangerous for both local people and worse the school. There is a reason why traffic calming has been implemented in this area and that is to reduce the traffic speed. What is proposed is to removed this restriction and even consider increasing the speed limit “ In a residential area?</p> <p>Your statistics on reducing travel time from Whitchurch into Bristol do not make sense. You have suggested that the travel time will be reduced by 1 minute on a journey which can take anywhere between 20 to 50 minutes! How can you possible suggest that your models take all situations into consideration when there is so much variability? To suggest that you nominally will save one whole minute is ridiculous to claim considering you are also suggesting that you will be increasing the flow of traffic through Whitchurch by linking this road to the main A4 Bath road.</p> <p>The link road connecting the A37 Whitchurch to the Bath Road provides an opportunity to expand housing not the reduction of congestion. The only advantage would be to bring the heavily congested traffic into Whitchurch and cause even more gridlock here. Alternatively the traffic from the A37 would impact more significantly on the congested A4 Bath road leading into Bristol from Hicks gate roundabout. The investment of time and money should be along this corridor and in particular the road layout at the A4 and West Town Lane junction. Why is there a car park for the supermarket utilising the space which could have been (and could still be) used for traffic routes adding in roundabout or feeder roads from the A4 to the continuation of the A4174 heading towards Hartcliffe roundabout via Airport Road.</p> <p>The proposed new village fills everyone with dread around the local Whitchurch area. Bristol are continuing to build on local green space, including the Hengrove Airport and South Bristol Hospital area thereby meeting their quota of increasing the housing in this local area. For BANES to consider constructing a 2500 house development and increasing both the traffic in the heavily congested area means that the planning and modelling methods you have been using are not taking anything into consideration. The investment in the new area would prevent investment in the under supported area of Whitchurch as there is a local school but no local shops or health centre. The examples of schools, shops and health centres seem a dream and not based on any realistic models. Without any form of investment Whitchurch will become less desirable but will end up with the increase of 4000</p>

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cars from the new development which again adds to the congestion of this area. This new development would be better located nearer Keynsham where there is continuing growth albeit again the main high street and facilities need investment of a significant amount to create a suitable area to sustain the increase in populous.

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**Respondent**

<b>Name</b>	Ms Colette Lewis
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH1 - Strategic Planning Framework
<b>Comment</b>
I am completely against this proposal on several reasons: Building on green belt No infrastructure No amenities No way of getting to Bath Overpopulation in one area Flooding risk Air pollution The list is endless, I really hope that you listen to the public and find a suitable brown field site in Bath.

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**Respondent**

<b>Name</b>	Mrs Lynsey Lewis
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)
<b>Comment</b>



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**Respondent**

<b>Name</b>	Miss Jane Lewis
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>	
CHAPTER 3 - Spatial Strategy including the rural areasSS1 - Green Belt	Focussed approach avoiding the
<b>Comment</b>	
<p>A focussed approach will set Midsomer Norton back 20 years of local planning and effort to maintain its rural and historical setting, separation from the towns of Paulton, Radstock and Westfield and protect our distinctive hillsides enclosing the valley. If the housing shortfall is to be dumped back to green fields on the outer settlements' boundaries, non-green belt land should be irrelevant in the bigger picture as we are entitled to resist further sprawl that will coalesce the housing developments into an amorphous and characterless mass. I believe that the proportion of green belt land across the country is 13% but as the local authority encompasses 70% green belt how can it be "fair" or feasible to consider an option that cannot fulfill the other values around environment, health and well-being, and historic character and setting? It is pie in the sky to suggest that mitigation is the answer to loss of the natural environment and I doubt that development will wait on satisfying the problem of lack of public transport, routes and frequency having been reduced dramatically despite an increase in resident numbers needing to travel and commute. There is no point in making A road and junction improvements if the single track lanes are subject to increasing and dangerous levels of rat-running due to the inevitable traffic displacement which Highways and Planning Officers have considered irrelevant even in recent decisions. I don't understand where the promotion of walking will come from. I walk a significant amount to get to bus routes and local services. Which bit of the options document cites genuine commitment and solutions to improve the networks and how they connect?</p>	

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**Respondent**

<b>Name</b>	Miss Jane Lewis
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>	
CHAPTER 3 - Spatial Strategy including the rural areasSS2 - the Green Belt	More dispersed approach avoiding
<b>Comment</b>	
Please carry forward my SS1 comments regarding the inequity of green belt designation and location such that towns outside the boundaries are not offered protection from urban sprawl and loss of separation and single identity. A more dispersed approach to development in the rral has an element of acceptabilty if proposals are kept to small numbers. This should provide some practical support for community involvement and regeneration. There is some incentive for public transport services to be improved if there was more committment to a network with practical journey times and a joining up of safe (and uplifting not traffic infested or unsafe concrete alleyways between non-integrated housing estates.	

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**Respondent**

<b>Name</b>	Miss Jane Lewis
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS3 - Combination of locations outside and within the Green Belt
<b>Comment</b>
See comments against SS1 and SS2 options. All settlements are entitled using other polices to a clear separation corridor between their parishes and others especially when this necessitates (apparently) green field destruction. The principle should be applied irrespective of non-designation or policy protection. It is my experience that the worst people for challenging green belt policy with respect to house extensions and new build are the ones who live in them.

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**Respondent**

<b>Name</b>	Miss Jane Lewis
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 7 - Somer ValleySOM4 - Other comments on Chapter 7
<b>Comment</b>
<p>Current Vision: I have yet to see any significant improvement in transport options and connections to and from Midsomer Norton over the last three ratified local plans so the term "will continue to improve" is disingenuous.</p> <p>Employment: I support an emphasis on improving employment prospects by protecting and bringing forward designated employment land and to support smaller sites being lost to housing. There must be an embargo on new allocations and permissions until the highways, transport and infrastructure issues are addressed rather than promised but not delivered. Housing numbers are expected to meet our 2029 commitment. Although a mild increase in employment since 2011 has been cited, retail and public service jobs (relying on reducing funding) do not encourage or support a strategic approach to training and qualifications for higher paid and career focussed occupations locally.</p> <p>Retail: permissions have been given that undermine the retail stock by conversion of shop-space to residential and changes to use. Apparently the built section at the bottom of the High Street (and to all intents and purposes valid extensions as people and cars go right or left) is not primary retail space. This needs to be addressed in any plans for the Town Centre; similarly the northern end should not be discounted in favour of the southern part as there are still shops trading and this is an important gateway to the retail area. The whole High Street and South Road MUST be integrated not split off.</p> <p>Historic and Natural Environment: Despite using the right words within 7.6.3, there is a requirement to recognise the value of local assets in an objective way and work for retention of and respect for what we have left. Policies around our local history and environment may not relate to listed buildings and AONBs but are equally important within the local context and community well-being and should be strengthened in the new Core Strategy.</p> <p>7.7 Transport: The issues listed are surprisingly complete and correct (must be the years of consultation we have been subjected to) but the statement "these need to be taken into account" in 7.7.2 smacks of recognising the what but not addressing the when nor the how of deliverance.</p> <p>7.8 I agree with the Spacial Priorities but as they do not vary from any previous plan aspirations (from Wansdyke onwards) I remain cynical of delivery any time within this new plan period.</p>

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**Respondent**

<b>Name</b>	Miss Jane Lewis
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 7 - Somer ValleySOM1 - Somer Valley Enterprise Zone
<b>Comment</b>
<p>I have no objection to land being allocated for the Somer Valley Enterprise Zone providing the aspirations and mix are realistic and that the area receives its full share of central government monies on which any proposals should be based. Progressing the EZ is a priority for the area now and before additional housing is allocated (or it must be embargoed until post-2029 and other allocations and permissions in the Somer Valley completed). It is imperative that the LPA does adequate research and marketing to realise the site's potential rather than allowing developers and landowners to dilute delivery through protestations of non-viability or no commercial interest at a later date (cf Barretts White Cross permissions where care home provision was deleted by the LPA without vigorous challenge imv).</p> <p>I am concerned that A362 road improvements alone are not the answer to the safety, congestion and access issues of the whole of Midsomer Norton, given that developments to date have not had to address any impact further than a few yards from the estate entrances (and Highway Officers have been in denial). The arrangements in Radstock at the A362/A367 junction is a case in point: a vast increase in traffic on the single track lanes to and from Welton, Paulton and Midsomer Norton since the residential development of the railway land.</p>

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**Respondent**

<b>Name</b>	Miss Jane Lewis
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 7 - Somer ValleySOM2 - Town centres and retail provision
<b>Comment</b>
<p>7.9.11 &amp; 12: I do not support any suggestion of an out of centre or edge of centre site for a food retail store in Midsomer Norton. Otherwise, it defeats the purpose. South Road car park could and should have been progressed after the John Thompson consultation in the mid to late 90s, at least 20 years ago. Low cost car parking management is possible to maximise space for those using the space for shopping and public transport connection and imaginative design of any new store should be encouraged along with some provision for cars. I have not seen any evidence to date that the Local Authority has ever been fully signed up to regenerating the South Road site despite endless meetings at all levels and which I attended year in and out to little effect. I need to be convinced that this policy will come with vigorous resolve to deliver.</p> <p>7.9.13: Planning permissions have not supported retention of larger retail space or parking. Casswells and its associated premises and storage were dismantled for residential as was property on The Island. The irony is that car provision was not required according to officers as there was "plenty of public parking" in the town. There seems to be no forward thinking in the plan regarding the smaller independent shops some of which are famous in the region (Rosecraft is a good example). Media coverage of high street decline does not distinguish between the big national stores in identical shopping precincts and what we offer locally so a plan for Midsomer Norton should not be about counteracting the internet but promoting what we are good at.</p>

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**Respondent**

<b>Name</b>	Miss Jane Lewis
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 8 - Development Management policiesDM2 - Wind energy development
<b>Comment</b>
It is stated in para 8.4.5 that a study has been undertaken to assess the landscape sensitivity to development. This is a statement only and provides no standards or definitions to assist the reader in how the various sensitivity zones within Diagram 46 (small scale wind turbines) have been assigned. It is particularly noticeable that areas to the south east (ie Somer Valley) and north west are the only ones marked as "low" or "moderate to low" without any hint of methodology to support the conclusions. The map should be removed and para 8.4.5 subsumed into para 8.4.7.

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**Respondent**

<b>Name</b>	Miss Jane Lewis
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>	
CHAPTER 8 - Development Management policiesDM17 - Management policies	Review of existing Development
<b>Comment</b>	
<p>The principles of CP6 must be strengthened and provide more definition, objectivity and local context in assessing what is important to keep. Currently environment, character and history within the Somer Valley area is often considered unimportant through the subjective (dare I say uninformed) opinions of an officer and/or a developer, the latter also influenced by best return for minimum outlay. It should not have to be for a resident to take the LPA to judicial review because it cannot interpret or follow its own LDP policies. Presumption should be in favour of preservation or re-use and not the other way round.</p> <p>NE1 and CP7 should only be combined if the principles are retained and strengthened so that development on Midsomer Norton's "important hillsides" and registered green spaces should not have to be fought on every occasion of opportunistic proposals for housing. Monger Hill West was lost on appeal in 2013 because of the failure of the LPA to demonstrate a 5 year land supply despite acknowledgement by the inspector of significant landscape and environmental harm in permitting development. Given our non green belt status a paragraph should be inserted stating that any green field development should not be allowed outside the HDB where it leads to a lack of observable or perceived space between settlements and to the detriment of maintaining ecological and rural setting corridors.</p> <p>HE1 requires policy strength to protect all heritage assets. There is an inevitable comparison of local mining, agricultural and mediaeval history in the Somer Valley with World Heritage City Bath and it is not acceptable to imply that the City is more important than (semi-)rural assets. Reference to all settings should be included in any amended policy not just for Bath.</p>	



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**Representations received online:**

**Respondent**

<b>Name</b>	Dr Christopher Lewis-Smith
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 7 - Somer ValleySOM4 - Other comments on Chapter 7
<b>Comment</b>
<p>I am writing to you with respect to the proposed Gladman greenfield housing development in Writhlington, and the problematic impact that this is likely to have on the already overused connecting road network. The local authority have identified existing infrastructure problems in this area and this particular proposal, judged against the Bath and North East Somerset Placemaking Plan, is clearly not sustainable.</p> <p>The Placemaking Plan Sustainability Appraisal Report (July 2017) states that the council is committed to ensure that adequate infrastructure is in place to serve all new development.</p> <p>The Plan notes that there is already a significant number of housing commitments in the Somer Valley but a limited capacity to generate new jobs. The report observes that there are: “High levels of out commuting from Midsomer Norton and Radstock mean[ing] that link road south from Bath to [Midsomer Norton and Radstock copes with high levels of commuter traffic. Radstock centre experiences traffic congestion” (page 31).</p> <p>Resonating with this, the Somer Valley Transport Strategy (October 2017) identifies problems relating to housing development in the area in respect of the lack of appropriate accompanying transport infrastructure development.</p> <p>With respect to the Gladman housing development proposal, the most direct connecting road in the direction of Bath is Church Hill leading onto Braysdown Lane. Both of these roads are single track with poor passing places. This route is heavily used during peak times and is also used by Writhlington School students walking to and from school from Peasedown. Current traffic monitoring between 8.00am and 9.00am identify 18 seconds between cars (video data available). This volume of traffic frequently causes the road to block. Bath bound commuter traffic from Writhlington that takes the alternative route through Radstock negotiates a busy junction which both primary and secondary school children cross on their way to and from school, and then, as the Placemaking Plan identifies, must negotiate the Radstock traffic congestion.</p> <p>The Gladman proposal suggests that commuting numbers would be offset by the increasing numbers of people working from home. Available data suggests that in 2014: 13.9% of the UK workforce worked from home (Office of National Statistics 2014), and in 2018: 13.7% worked from home (Cox, A. 2018). While data concerning this may vary, these percentages cannot be considered as a significant offset to commuting from 160 new homes.</p> <p>I therefore urge you to not support this development proposal. While there is a commitment on the</p>

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**Representations received online:**

part of our local authority to build new housing, site choices should prioritise development on brownfield sites and the re-development of vacant and underused industrial land and factories, and they should be chosen to have less impact on local infrastructure as outlined above.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs. Laurel Linden
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>	
CHAPTER 3 - Spatial Strategy including the rural areasSS1 - Green Belt	Focussed approach avoiding the
<b>Comment</b>	
CHAPTER 3 Spatial Strategy including rural areas	
<p>“SS1 - Focussed approach avoiding the green belt</p> <p>The new Local Plan 2016-2036 is proposing development of RAD26 and RAD25. I want this to be stopped and removed from the Plan for the following reasons:</p> <ol style="list-style-type: none"> <li>1. The Writhlington green field sites are outside of the Housing Development Boundary. If plans were to go ahead, it would therefore go directly against B&amp;NES own Green Infrastructure Policy. Writhlington has already exceeded its quota for new houses in the last 18 months and so there should be no further consideration of any proposals until 2029. It’s also questionable that a development in this particular area with just 30% of housing earmarked as affordable would be of significant benefit given the local socioeconomic demographic.</li> <li>2. This agricultural/ green space proposal has also failed to take into consideration the detrimental effect a significantly increased traffic load of approximately 200+ vehicles would pose onto the single track lane of Church Hill. This narrow lane leading down from Manor Road and serving the “Conservation area” of Lower Writhlington could not possibly support the road layout infrastructure needs of such an extensive development. Church Hill is already an overloaded and dangerous shortcut leading from Writhlington School on the A362 up to the A367 Bath road, it’s largely utilised as such due to excessive traffic congestion in Radstock. Both Church Hill and Manor Road are particularly prone to heavy use during school run hours [Peasedown St John to Writhlington] &amp; generally during rush hour. It’s wholly inappropriate to even consider a country lane running just metres from the proposed site entrance could support the needs of hundreds of vehicles from the proposed 160 house development. The suggested proposal to place a bollard on Old Road preventing access from the development site onto Manor Road does little to appease the above volume of traffic concerns. There is a single house, the Primary school and a garage along this lane. A suggestion for the Manor Road end of Church Hill Lane to house the bollard and/or with a no/one way entry heading down the hill north wards would be a more appropriate option to explore in the event of this development actually receiving B&amp;NES approval. This proposal would divert the majority of traffic away from Manor Road via the Old Road onto either Green Parlour Lane/ Braysdown Lane or the A362 Radstock/ Writhlington - Frome Road. Although a considered 1500 children's lives are potentially at risk daily with the current excessive traffic issues at the A362 Knobsbury Lane/ Manor Road intersection.</li> </ol>	

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**Representations received online:**

3. On a personal note our Church Hill Lower Writhlington family annexe application although approved now initially met with a recommendation for refusal by B&NES. One of the grounds sited being the extra volume of traffic it would bring to our conservation area. This was potentially the periodical single car use of family visitors.

4. The developers brochure details the acceptability of development in this area as it supports little wildlife. As a local with a keen interest in nature and our natural surroundings, along with its wildlife inhabitants I suggest this is somewhat misguided. The next paragraph in the booklet continues to support the above as it discusses housing bats, newts etc and follows on to suggest future surveys may well find protected species within the proposed development area.

5. Any building work is currently also inappropriate as there appears to be no likelihood of effective drainage or sewage systems.

The proposed development of RAD26 and RAD25 for all of the above detailed reasons can not therefore in all seriousness be considered as a feasible contender for a solution to the B&NES' housing shortage.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Amy Lingard
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH1 - Strategic Planning Framework
<b>Comment</b>
<p>I would like to voice my concerns regarding local plan 2016-2036</p> <p>I lived in whitchurch for 3 years and my son still goes to school there, the attraction was its quieter and attractiveness of the location and surrounding field space these plans will ruin that and make this area become less attractive and also ruin our community whilst decreasing house values</p> <p>Our schools are very much safe at present giving us opportunity to walk with our children with a 20mph speed limit which we feel safe to be in! This will have a massive affect on the safety of our schools with a main road upto 50mph limited and even if this is decreased to 20mph around the school locations will drivers actually implicate the slower speeds on main roads?? I doubt this very much!! Plus additional traffic around these areas will not be safe for children to walk to school, walking to school is encouraged from many parties and this will just increase danger for our children who attend these schools</p> <p>I feel this decision is only happening to support Banes on building an additional 2500 homes with our area as increase in population will cause more traffic in an area which is already busy on main roads like the Wells road around peak times within the day. This decision has not been made in favour of decreasing congestion around the ring road and brislington and is given people from those areas false facts on actual reason for this to happen</p> <p>We chose to live in our area because of the beauty and less pollution and you now want to increase pollution and affect our children/ourselves and our home so you can cash in on new homes! We have recently had new homes and estates built on Staunton Lane and recently on the back of Bristol Road, more estates have been created off Wells road like Acer Village and so forth. More homes is not what is needed in this area. What is needed is to protect the green we have left and environment for our children and for those after them</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Lee Lukins
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
<p>We accept that improvement to the existing infrastructure in South Bristol is needed. However my family vehemently disagrees with 6.13.2 in the Local Plan Consultation Document that in other words says 'the proposals will ruin the community that is ripped apart by the two link road proposals, but that's OK because it serves the greater good'. This is a disgraceful attitude to the design. Currently the Windways, Church Road, Washing Pound Lane, and closely surrounding estates benefit from a semi-rural setting with the Greenbelt just the other side of the fence. In all previous LA policy it has always been stated how important it is to protect the patches of green belt separating Whitchurch to the Village, to Stockwood, etc. All of a sudden its not quite as important? These areas are quieter in comparison to the rest of the city and is great for bringing up my young family. Encouraging all of the ring road traffic right through the middle will decimate the single most attractive element of the community and reduce the safety in and around Bridge Farm School. I thought the LA traditional tries to discourage rat runs through established communities? The option that connects to Stoneberry Road is particularly offensive as I would see (and hear, and breathe) the proposed roundabout from my Front Elevation windows. I have no doubt both options will involve CPO's or just as bad the school losing the grass play areas - we should be protecting schools that are currently performing well, not hinder them! Whitchurch will become the new Whitchurch Village or Brislington Hill, or even Hotwells Road (which ironically is now so much better due to the new link road built OUTSIDE of the city!!!). I also believe this scheme is mostly motivated by the need to ascertain approval for the 2500 new homes within BANES adjacent to the settlement boundary rather than this being genuinely the best option to improve infrastructure. If approved, this scheme will force my family to move, which is absolutely heartbreaking.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	mrs Abigel Mahoney
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH4 - Housing
<b>Comment</b>
The Whitchurch village development proposals are unsustainable,there are more sustainable locations that should be considered. The proposals are for unsustainable development within the green belt and an area of significant flooding.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	mr craig mahoney
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)
<b>Comment</b>



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	mr craig Mahoney
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH4 - Housing
<b>Comment</b>
The Whitchurch village development proposals are unsustainable,there are more sustainable locations that should be considered. The proposals are for unsustainable development within the green belt and an area of significant flooding.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Sally Marquiss
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
Universities should accommodate increased student numbers within Halls built on campus. No more Halls or HMOs in Twerton please.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Sally Marquiss
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
There has been enough student housing development in Twerton. Please do not allow any more. Universities should build on their own land. Stop family homes being used for student HMO's. The whole demographic in Twerton is changing, families are being forced out of Bath in search of a family community - this is wrong.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Caroline Mary Surname Walsh
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>	
CHAPTER 8 - Development Management policiesDM10 -	Housing in Green Belt Villages
<b>Comment</b>	
<p>I have spent many hours attending meetings leafleting local residents over the last ten years and here we are again (Different titles used to be RSS) Why does Whitchurch have to be a dumping ground for Bath and North East Somerset Council The council have allowed developers to build and have destroyed most of the Green Belt to solve I believe Developers rule this country. "Housing Numbers" I would like to know how the numbers are calculated and from which government survey? It is my belief the number is pulled from the air and if enough people read it with no comment that is the number used.</p> <p><b>THE NEW ROAD PROPOSALS</b></p> <p>Would it be possible to publish the Airport Road plans which if my memory serves me correctly should have connected to Ring road then to Motorway system at Brislington money ran out and it was not completed so complete this road first See if it solves the problem. The new road proposal that makes no sense but of course it will only affect Whitchurch and Stockwood not Bath or Bristol City</p> <p>It would cause chaos and the pollution levels will be very high</p> <p>The school is being enlarged first we should see if the air is clean enough even without a new town and roads.</p> <p>A new road from Chelwood to the motorway system(maybe costly)would solve the heavy goods vehicles using the narrow lanes through our villages Pensford is a prime example'</p> <p>Let us not forget proposed extension to the Bristol International Airport that will affect this area many of us live on the flight path m0re pollution.</p> <p>I would just ask those responsible for these crazy ideas think again.</p> <p>Why can we not let every village have 50 new house mostly 2-3 bedroom homes this would help keep villages thrive and social needs may be kept. Sorry not too much profits for large developers but could give work to local builders and boost jobs</p>	

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Neal Mathias
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH1 - Strategic Planning Framework
<b>Comment</b>
<p>Local Plan 2016-2016 Consultation Planning Policy, <span style="float: right;">December 18th 2018</span> B&amp;NES, Lewis House, Manvers Street, BATH BA1 1JG</p> <p>Dear Sir/Madam,</p> <p>I object to the BANES Local Plan proposal to build up to 2.500 houses, Park &amp; Ride and South Orbital Link Road at Whitchurch Village over the planned period 2016-2036. It is unsound and Whitchurch Village is absolutely the wrong place to be putting this development. I am strongly of the opinion that our Village cannot facilitate any more houses or traffic. The village has already lost Greenbelt and been expanded over the last few years by 250-300 houses, enough is enough.</p> <p>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.</p> <p>This proposal is hugely detrimental to the area, air pollution, quality of life, the community of a small village. Other more SUSTAINABLE sites could and should be considered. 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" . (<a href="http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/LP20162036/lp_201636_io_whitchurch_green_belt_assessment.pdf">http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/LP20162036/lp_201636_io_whitchurch_green_belt_assessment.pdf</a>).</p> <p><b>Greenbelt and Urban Sprawl</b> The green belt is made up of pasture, which is home to countless wild animals including deer, foxes, badgers, birds of prey including a number of beautiful owls. On a smaller scale but no less important we have a huge variety of wild birds both nesting and migratory, the hedgerows and pasture are home to millions of vital insects which are suffering from shrinking habitats, once these insects, birds and animals are gone they are gone for good.</p>

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**Representations received online:**

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

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

The Local Plan will have a devastating impact on cells 52 A to 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.

The remaining Horseworld land (52 A-B) within the village has been earmarked for development on the plan, but because the owner wants to sell that does not automatically make it a good place to build. Vital village Greenbelt land will be lost, and the village will become merged with Stockwood thus losing its identity. The potential hundreds of houses that could be squeezed into this area will generate a huge amount of traffic, which will inevitably be driven out onto Staunton Lane or Queen Charlton Lane. Staunton Lane in particular cannot cope with additional traffic. The 200 houses on the old Horseworld visitor centre have not been built and occupied yet so the effect of that development on the immediate area is still unknown! It is only going to get worse.

The plan needs to ensure that housing delivery happens on the most sustainable sites first and not allow the Green Belt or green field sites to be allocated straight away.

The development locations that have been identified for expansion have fewer facilities and are at greater distances from shops, hospitals, schools, opticians, pharmacies, doctors' surgeries and employment than others that are rejected. There appears to be no attempt to evaluate the degree of remoteness from essential services instead relying on expensive and quite possibly, unattainable transport solutions.

It is extremely disappointing that the plan finds it necessary to identify so many green field and Green Belt sites for development, without having a clear programme of phasing or a sequential test in place. Government policy is clear, for example, that the geographical extent of Green Belts, can only be changed in exceptional circumstances (NPPF para 83). Ministers have also made clear "that demand for housing alone will not change Green Belt boundaries."

If Green Belt controls are loosened now we simply allow more land to be built on where developers can make maximum profit, as has been the experience of other countries in Europe, particularly Ireland and Spain. It is essential that we use more suitable land first. In 2014, a CPRE report found that there is enough suitable brownfield land, available now, for at least one million new homes (CPRE, From Wasted Space to Living Spaces, November 2014). The report also demonstrated that, far from being a finite resource, brownfield land is constantly being replenished, and, usually, many more homes can be delivered on a brownfield site than an equivalent area of green field land.

Building on green field sites is not an efficient use of land nor is it a quick route to achieving more housing. Government land use change statistics show that, in every year since 2004, we have consistently built an average 50% or more houses on brownfield sites than on equivalent areas of green field (DCLG, Land Use Change Statistics, Live Table 223). Brownfield land is also built out, on

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**Representations received online:**

average, six months faster than green field sites.

**Other better suited locations**

The proposed 2,500 houses are being proposed by BANES but are purely to serve a Bristol council requirement to build houses. There are other locations better suited to such a large development. It should be located close to existing infrastructure rather than having to rip up more green belt and build new infrastructure.

The first priority should be ensuring that houses are built primarily on brownfield sites within our existing towns and cities to maximise the efficient provision of transport and other services and infrastructure.

The plan needs to ensure that housing delivery happens on the most sustainable sites first and not allow the Green Belt or green field sites to be allocated straight away. Already, large numbers of housing developments are being proposed for green sites. If we allow large scale releases of green field sites, although this might initially be attractive for investment in the transport system and other forms of planning gain, it is likely to be more costly to public finance in the long term. Dispersed development can result in lower economic productivity through a dispersed population, higher transport and infrastructure costs, and loss of productive farm land. The prioritisation on brownfield development would allow great opportunity for investment in public transport to be funded or recouped through greater usage as well as encouraging greater economic productivity. The plan should focus housing development on brownfield sites, and lacks any strategy to achieve this aim.

As a last resort, why has land near the new South Bristol link road at Bishopsworth and Highridge and the A38 not been earmarked for these houses? The new road and new metro bus are ideally located for such a large development.

Similarly, the proposed development at Hicksgate/Brislington Road are only contributing 750 houses. This site should be considered for much more. It is near rail links for travel for employment to Bristol and Bath. It is beside the Ring Road with faster access to the Motorways. It is close to employment, shops, post office, doctors dentists, schools (both senior and junior). The infrastructure is already there. Whitchurch Village cannot provide any of this.

Bristol CC have decided to reject any plans for the intended Arena next to Templemeads. This now must be a prime site and a prime reason for allocating these 2.500 houses, where people can live and work in the City and so reduce car use, pollution, and provide a sustainable and enjoyable location.

Another more appropriate location is Long Ashton, where infrastructure is already in place. That appears to have been discounted because residents value the Greenbelt. What about Whitchurch Village residents? We also value our Greenbelt land.

**Previous consultation responses**

We have given you our thoughts about our village on so many occasions and we have filled in Surveys to demonstrate to you what we are thinking about our area.

98% of respondents wanted the Green Belt retained. It is vitally important to our Village.

88% of respondents voted overwhelmingly for the village to remain a village.

Adding more houses to the area will destroy the village and it will become a town. Whitchurch Village

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**Representations received online:**

will have to be re-named!

The area has serious constraints regarding travel, employment, schools, shops etc. and already the air pollution exceeds the National Guidelines. This is not a sustainable location. See para 14 of the NPPF. 60% of respondents travel to work by car. Multiple car ownership accounts for 97%.

Hicks Gate/Brislington Road can tick all the following points

- â€¢ Near a Railway Station for commute to either Bristol or Bath for employment
- â€¢ Beside a significant Ring Road,
- â€¢ Employment close by
- â€¢ Schools, both senior and junior
- â€¢ Near shops/supermarket, Post Office
- â€¢ Doctor, Dentist

Whitchurch Village cannot tick ANY of these points which demonstrates just how unsuitable this location is for development.

South Bristol link road unsound

The proposal for a new "link" road from Hicksgate, close to Whitchurch Village and on to Whitchurch is equally unsound. It would generate a huge volume of additional traffic to the village, including heavy goods traffic travelling North from the South coast, and vice-versa. This will create more air pollution, noise and traffic movement down an already congested A37 into Bristol, and through Whitchurch on the narrow Whitchurch Lane. The A37 currently sees long traffic tail backs through the village past Whitchurch Primary School and across the Whitchurch viaduct back towards town and from the South (Pensford) through our village. I do not believe that a Park & Ride will eliminate this congestion, I believe it will add to the problem.

Park & Ride schemes are not priced to act as an incentive for car users to switch. It might be cheaper for a single car occupant to travel on the Park & Ride but for multiple occupants it is more expensive! Where is the logic in that? To get people out of cars and into buses it has to be cheaper otherwise there is no incentive.

The proposed site of a roundabout joining the proposed new link road with Whitchurch Lane is to be located on the village park, allotments, rugby club, cricket club and field used for the village fair! You would be ruining our village community.

Similarly the proposed routes from that roundabout on to Whitchurch suggest joining up with Whitchurch Lane, funnelling all this additional traffic down a narrow property lined road, close to Bridge Farm School. It is obvious to local residents that this proposal has not been thought through properly. The area cannot sustain such a ring road. Hengrove already has plans for thousands of houses and an inevitable extra volume of traffic. That together with additional houses in Whitchurch and the thousands of houses being built on the South Western edge of Keynsham will cause gridlock to the area.

Have the planners looked into alternatives to the A4 "A37" connection by making improvements to the A4/Callington Road Junction? Callington is already a major route and links directly towards the south Bristol link road.

Air pollution

The ring road would significantly increase air pollution in the vicinity of Whitchurch village putting the



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health of local residents at risk. The BANES proposal for a Clean Air Zone in Bath states that "air pollution is caused by vehicle emissions and puts health at risk. It makes heart and lung conditions, such as asthma, worse, and is linked to increased possibility of heart attacks and dementia." . The Government has told BANES to reduce pollution by 2021 so it makes no sense to increase it in our village.

Please listen to us

It is obvious to me that only people who do not live in the area would consider these proposals sustainable, therefore I want to state that I strongly object to these proposals and suggest more be done to improve public services, transport links, and school places near children's homes.

We have been asked for our opinions so many times through your consultations. We have not been listened to but we very much hope you will listen to us now.

Yours sincerely,

Neal Mathias

1 The Homestead, Staunton Lane, Whitchurch, Bristol. BS14 0QL

**Attachments Included**

[http://www.bathnes.gov.uk/sites/default/files/webform/local\\_plan\\_objection\\_neal\\_mathias.doc](http://www.bathnes.gov.uk/sites/default/files/webform/local_plan_objection_neal_mathias.doc)  
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[http://www.bathnes.gov.uk/sites/default/files/webform/local\\_plan\\_objection\\_neal\\_mathias\\_0.docx](http://www.bathnes.gov.uk/sites/default/files/webform/local_plan_objection_neal_mathias_0.docx)

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Nancy Mathias
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>	
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH1 - Strategic Planning Framework	
<b>Comment</b>	
Local Plan 2016-2016 Consultation Planning Policy, B&NES, Lewis House, Manvers Street, BATH BA1 1JG	January 3rd 2019
<p>Dear Sir/Madam,</p> <p>I object to the BANES Local Plan proposal to build up to 2.500 houses, Park &amp; Ride and South Orbital Link Road at Whitchurch Village over the planned period 2016-2036. It is unsound and Whitchurch Village is absolutely the wrong place to be putting this development. I am strongly of the opinion that our Village cannot facilitate any more houses or traffic. The village has already lost Greenbelt and been expanded over the last few years by 250-300 houses, enough is enough.</p> <p>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.</p> <p>This proposal is hugely detrimental to the area, air pollution, quality of life, the community of a small village. Other more SUSTAINABLE sites could and should be considered. 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" .          (<a href="http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/LP20162036/lp_201636_io_whitchurch_green_belt_assessment.pdf">http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/LP20162036/lp_201636_io_whitchurch_green_belt_assessment.pdf</a>).</p> <p><b>Greenbelt and Urban Sprawl</b>          The green belt is made up of pasture, which is home to countless wild animals including deer, foxes, badgers, birds of prey including a number of beautiful owls. On a smaller scale but no less important we have a huge variety of wild birds both nesting and migratory, the hedgerows and pasture are home to millions of vital insects which are suffering from shrinking habitats, once these insects, birds and animals are gone they are gone for good.</p>	

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**Representations received online:**

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

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

The Local Plan will have a devastating impact on cells 52 A to 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.

The remaining Horseworld land (52 A-B) within the village has been earmarked for development on the plan, but because the owner wants to sell that does not automatically make it a good place to build. Vital village Greenbelt land will be lost, and the village will become merged with Stockwood thus losing its identity. The potential hundreds of houses that could be squeezed into this area will generate a huge amount of traffic, which will inevitably be driven out onto Staunton Lane or Queen Charlton Lane. Staunton Lane in particular cannot cope with additional traffic. The 200 houses on the old Horseworld visitor centre have not been built and occupied yet so the effect of that development on the immediate area is still unknown! It is only going to get worse.

The plan needs to ensure that housing delivery happens on the most sustainable sites first and not allow the Green Belt or green field sites to be allocated straight away.

The development locations that have been identified for expansion have fewer facilities and are at greater distances from shops, hospitals, schools, opticians, pharmacies, doctors' surgeries and employment than others that are rejected. There appears to be no attempt to evaluate the degree of remoteness from essential services instead relying on expensive and quite possibly, unattainable transport solutions.

It is extremely disappointing that the plan finds it necessary to identify so many green field and Green Belt sites for development, without having a clear programme of phasing or a sequential test in place. Government policy is clear, for example, that the geographical extent of Green Belts, can only be changed in exceptional circumstances (NPPF para 83). Ministers have also made clear "that demand for housing alone will not change Green Belt boundaries."

If Green Belt controls are loosened now we simply allow more land to be built on where developers can make maximum profit, as has been the experience of other countries in Europe, particularly Ireland and Spain. It is essential that we use more suitable land first. In 2014, a CPRE report found that there is enough suitable brownfield land, available now, for at least one million new homes (CPRE, From Wasted Space to Living Spaces, November 2014). The report also demonstrated that, far from being a finite resource, brownfield land is constantly being replenished, and, usually, many more homes can be delivered on a brownfield site than an equivalent area of green field land.

Building on green field sites is not an efficient use of land nor is it a quick route to achieving more housing. Government land use change statistics show that, in every year since 2004, we have consistently built an average 50% or more houses on brownfield sites than on equivalent areas of green field (DCLG, Land Use Change Statistics, Live Table 223). Brownfield land is also built out, on

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**Representations received online:**

average, six months faster than green field sites.

**Other better suited locations**

The proposed 2,500 houses are being proposed by BANES but are purely to serve a Bristol council requirement to build houses. There are other locations better suited to such a large development. It should be located close to existing infrastructure rather than having to rip up more green belt and build new infrastructure.

The first priority should be ensuring that houses are built primarily on brownfield sites within our existing towns and cities to maximise the efficient provision of transport and other services and infrastructure.

The plan needs to ensure that housing delivery happens on the most sustainable sites first and not allow the Green Belt or green field sites to be allocated straight away. Already, large numbers of housing developments are being proposed for green sites. If we allow large scale releases of green field sites, although this might initially be attractive for investment in the transport system and other forms of planning gain, it is likely to be more costly to public finance in the long term. Dispersed development can result in lower economic productivity through a dispersed population, higher transport and infrastructure costs, and loss of productive farm land. The prioritisation on brownfield development would allow great opportunity for investment in public transport to be funded or recouped through greater usage as well as encouraging greater economic productivity. The plan should focus housing development on brownfield sites, and lacks any strategy to achieve this aim.

As a last resort, why has land near the new South Bristol link road at Bishopsworth and Highridge and the A38 not been earmarked for these houses? The new road and new metro bus are ideally located for such a large development.

Similarly, the proposed development at Hicksgate/Brislington Road are only contributing 750 houses. This site should be considered for much more. It is near rail links for travel for employment to Bristol and Bath. It is beside the Ring Road with faster access to the Motorways. It is close to employment, shops, post office, doctors dentists, schools (both senior and junior). The infrastructure is already there. Whitchurch Village cannot provide any of this.

Bristol CC have decided to reject any plans for the intended Arena next to Templemeads. This now must be a prime site and a prime reason for allocating these 2,500 houses, where people can live and work in the City and so reduce car use, pollution, and provide a sustainable and enjoyable location.

Another more appropriate location is Long Ashton, where infrastructure is already in place. That appears to have been discounted because residents value the Greenbelt. What about Whitchurch Village residents? We also value our Greenbelt land.

**Previous consultation responses**

We have given you our thoughts about our village on so many occasions and we have filled in Surveys to demonstrate to you what we are thinking about our area.

98% of respondents wanted the Green Belt retained. It is vitally important to our Village.

88% of respondents voted overwhelmingly for the village to remain a village.

Adding more houses to the area will destroy the village and it will become a town. Whitchurch Village

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will have to be re-named!

The area has serious constraints regarding travel, employment, schools, shops etc. and already the air pollution exceeds the National Guidelines. This is not a sustainable location. See para 14 of the NPPF. 60% of respondents travel to work by car. Multiple car ownership accounts for 97%.

Hicks Gate/Brislington Road can tick all the following points

- â€¢ Near a Railway Station for commute to either Bristol or Bath for employment
- â€¢ Beside a significant Ring Road,
- â€¢ Employment close by
- â€¢ Schools, both senior and junior
- â€¢ Near shops/supermarket, Post Office
- â€¢ Doctor, Dentist

Whitchurch Village cannot tick ANY of these points which demonstrates just how unsuitable this location is for development.

South Bristol link road unsound

The proposal for a new "link" road from Hicksgate, close to Whitchurch Village and on to Whitchurch is equally unsound. It would generate a huge volume of additional traffic to the village, including heavy goods traffic travelling North from the South coast, and vice-versa. This will create more air pollution, noise and traffic movement down an already congested A37 into Bristol, and through Whitchurch on the narrow Whitchurch Lane. The A37 currently sees long traffic tail backs through the village past Whitchurch Primary School and across the Whitchurch viaduct back towards town and from the South (Pensford) through our village. I do not believe that a Park & Ride will eliminate this congestion, I believe it will add to the problem.

Park & Ride schemes are not priced to act as an incentive for car users to switch. It might be cheaper for a single car occupant to travel on the Park & Ride but for multiple occupants it is more expensive! Where is the logic in that? To get people out of cars and into buses it has to be cheaper otherwise there is no incentive.

The proposed site of a roundabout joining the proposed new link road with Whitchurch Lane is to be located on the village park, allotments, rugby club, cricket club and field used for the village fair! You would be ruining our village community.

Similarly the proposed routes from that roundabout on to Whitchurch suggest joining up with Whitchurch Lane, funnelling all this additional traffic down a narrow property lined road, close to Bridge Farm School. It is obvious to local residents that this proposal has not been thought through properly. The area cannot sustain such a ring road. Hengrove already has plans for thousands of houses and an inevitable extra volume of traffic. That together with additional houses in Whitchurch and the thousands of houses being built on the South Western edge of Keynsham will cause gridlock to the area.

Have the planners looked into alternatives to the A4 "A37" connection by making improvements to the A4/Callington Road Junction? Callington is already a major route and links directly towards the south Bristol link road.

Air pollution

The ring road would significantly increase air pollution in the vicinity of Whitchurch village putting the

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health of local residents at risk. The BANES proposal for a Clean Air Zone in Bath states that "air pollution is caused by vehicle emissions and puts health at risk. It makes heart and lung conditions, such as asthma, worse, and is linked to increased possibility of heart attacks and dementia." . The Government has told BANES to reduce pollution by 2021 so it makes no sense to increase it in our village.

Please listen to us

It is obvious to me that only people who do not live in the area would consider these proposals sustainable, therefore I want to state that I strongly object to these proposals and suggest more be done to improve public services, transport links, and school places near children's homes.

We have been asked for our opinions so many times through your consultations. We have not been listened to but we very much hope you will listen to us now.

Yours sincerely,

Nancy Mathias

1 The Homestead, Staunton Lane, Whitchurch, Bristol. BS14 0QL

**Attachments Included**

[http://www.bathnes.gov.uk/sites/default/files/webform/local\\_plan\\_objection\\_nancy\\_mathias.docx](http://www.bathnes.gov.uk/sites/default/files/webform/local_plan_objection_nancy_mathias.docx)

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**Respondent**

<b>Name</b>	Mr Paul mccouaig
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
Ref south Bristol orbital link road, I am registering my concerns about the increase in the amount of traffic that will be diverted through whitchurch and the environmental impact on the health of the local community. Also this road will be used as a short cut to Bristol airport which is increasing it's capacity by 30% and when there are problems with the motorway system around the are traffic will use the road to bypass Bristol altogether causing unacceptable air quality conditions.

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**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Yvonne mccouaig
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
With the building of houses on hengrove park an already busy Whitchurch lane will become grid locked!



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**Representations received online:**

**Respondent**

<b>Name</b>	Mrs yvonne mccouaig
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH4 - Housing
<b>Comment</b>
There are enough brown field sites and empty shopping malls. No need to build on the green belt!

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**Representations received online:**

**Respondent**

<b>Name</b>	Mr Paul mccouaig
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH4 - Housing
<b>Comment</b>
With the building of thousands of new houses in and around the whitchurch area and the total lack of any new infrastructure e.i. doctors, dentists, nurseries, schools. There are plenty of brown field sites available to build new housing without destroying the local environment.

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**Representations received online:**

**Respondent**

<b>Name</b>	Mrs mary meacham
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH2 - Whitchurch SDL Garden City Principles
<b>Comment</b>
<p>I object to the development of green belt land. This development would have a detrimental effect on the landscape, wildlife and communities in the surrounding area.</p> <p>The sense of place and community and quality of life for current residents would be very badly affected by such a development.</p> <p>The A37 is already a busy road and the addition of thousands of houses would make access into Bristol not only difficult for them but for current residents. It would also increase current problems at Pensford.</p> <p>The plans for the development show open green spaces and easy access to the surrounding countryside, but this same green space and access to countryside would end for current residents by the building of a new road from A4 to A37 and a new link from Whitchurch to the South Bristol Link road.</p> <p>This would create a barrier for Whitchurch and Stockwood residents, cut off from easy and quiet access to the countryside, and small communities.</p> <p>Whitchurch Village would be destroyed by a link being made to the South Bristol link road.</p> <p>The Whitchurch Village Neighbourhood Plan was recently adopted by BANES and residents voted for the retention of green belt. The green belt should not be revisited for alteration within the current Core strategy documents.</p> <p>Other sites are more sustainable and can offer better current infrastructure, including Long Ashton and Bath.</p>

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**Representations received online:**

**Respondent**

<b>Name</b>	Mr. John meacham
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH2 - Whitchurch SDL Garden City Principles
<b>Comment</b>
<p>The Plan is unsound as paragraph 14 in the NPPF clearly states that housing targets should not overridw constraints within the area. The constraints at nearby Whitchurch Village are the Green Belt and Flooding. The Whitchurch Village Neighbourhood Plan has recently been adopted by B&amp;NES and residents (98%) voted both for the retention of the Green Belt and for the Plan itself with a large voting turnout. Also that the Green Belt should not be revisited for alteration within the current Core Strategy documents. The Plan envisages that 1500 - 2000 houses should be built which would take hundreds of acres of Green Belt land at present mostly used for agriculture. This massive development is not sustainable because amongst other issues there is very little employment without travelling a far distance, there are no shops and the local road network including the A37 through Whitchurch Village is already congested. Other sites are more sustainable and can offer all necessary infrastucture such as Hicks Gate/Brislington , Long Ashton and Bath with rail links to Bath and Bristol, Metro Bus and Ring roads to Motorways, employment, schools and shops etc. The Whitchurch Garden development makes great play of green spaces, walking and cycling opportunities etc but by building these houses and the proposed A4/A37 Link Road which to some extent is being driven by this plan these opportunities will be severely reduced for current residents of the area. With this potential number of additional cars in the area wildlife will be greatly affected as will the current road difficulties encountered by the residents of Pensford.</p>

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**Representations received online:**

**Respondent**

<b>Name</b>	Mr. John meacham
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH2 - Whitchurch SDL Garden City Principles
<b>Comment</b>
<p>The Plan is unsound as paragraph 14 in the NPPF clearly states that housing targets should not overridw constraints within the area. The constraints at nearby Whitchurch Village are the Green Belt and Flooding. The Whitchurch Village Neighbourhood Plan has recently been adopted by B&amp;NES and residents (98%) voted both for the retention of the Green Belt and for the Plan itself with a large voting turnout. Also that the Green Belt should not be revisited for alteration within the current Core Strategy documents. The Plan envisages that 1500 - 2000 houses should be built which would take hundreds of acres of Green Belt land at present mostly used for agriculture. This massive development is not sustainable because amongst other issues there is very little employment without travelling a far distance, there are no shops and the local road network including the A37 through Whitchurch Village is already congested. Other sites are more sustainable and can offer all necessary infrastucture such as Hicks Gate/Brislington , Long Ashton and Bath with rail links to Bath and Bristol, Metro Bus and Ring roads to Motorways, employment, schools and shops etc. The Whitchurch Garden development makes great play of green spaces, walking and cycling opportunities etc but by building these houses and the proposed A4/A37 Link Road which to some extent is being driven by this plan these opportunities will be severely reduced for current residents of the area. With this potential number of additional cars in the area wildlife will be greatly affected as will the current road difficulties encountered by the residents of Pensford.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	MR DAVID MILLARD
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH12 - Other comments on Chapter 6
<b>Comment</b>
<p>MY COMMENTS RELATE TO THE FULL CHAPTER AND HOW ILL ADVISED AND THOUGHT THROUGH IT IS:</p> <p>WHITCHURCH VILLAGE CANNOT HANDLE 2500 MORE HOMES = 10,000 PEOPLE. THE INFRASTRUCTURE IS NOT THERE. IT SHOULD TAKE 200-300 AND HAVE THESE AS AFFORDABLE HOMES AND FOR LOCALS ONLY.(ACTION MEETING 27/11 HAD VERY FEW UNDER 40'S AS THESE CANNOT AFFORD TO LIVE LOCALLY!!). A POINT TO NLTE AND ACT UPON...</p> <p>THE RING ROAD FROM HICKS GATE WILL SPLIT THE GREENBELT AND DAMAGE THE ALLOTMENTS AND THE LOCAL AREA - WITH NOISE AND POLLUTION. IT WILL SEE CARS COMING UP FROM THE A4 TO TRY THE A37 ROUTE INTO BRISTOL. IT WILL ADD TO THE WOES OF THE VILLAGE AND THE A37 NOT IMPROVE THEM - MORE RISK FOR THE CHILDREN AT THE SCHOOL!!</p> <p>THE PLANNERS AT THE WHITCHURCH HALL MEETING HAD NO IDEA OF THE TRAFFIC ALREADY HERE AND THE TIMES ON THE BAORD FROM 2013 TO BE FRANK ARE IMPOSSIBLE. THEY WERE MODELLED I WAS TOLD AND NOT ACTUALLY DRIVEN - MAYBE YOU SHOULD TRY THAT... THE TWO ROUTES FROM THE A37 ACROSS FIELDS (GREENBELT) INTO WHITCHURCH LANE ARE TO BE FRANK SURELY A JOKE. INTO 20MPH ZONES NOT WIDE ENOUGH FOR HGV'S AND THATS WHAT WILL HAPPEN!! PLUS PAST A 1000 PUPIL SCHOOL, WITH ONE PROPOSED ROUTE BEING PAST TWO OF IT'S THREE SIDES!! NO THOUGHT AS TO HOW THE ROADS WILL BE JOINED UP AND I QUOTE A PLANNER "THAT WILL BE BRISTOL'S PROBLEM NOT OURS". SO TRY AND DUMP 2500 NEW HOMES THE FARTHEST FROM BATH POSSIBLE, COLLECT THE COUNCIL TAX AND HAVE BRISTOL PICK UP ALL THE ISSUES.</p> <p>A NEW PARK AND RIDE NEAR THE A37 - WHY? WHO WILL USE IT? THERE WILL BE ONE AT HICKS GATE - YOU DONT NEED TWO!! THERE IS NOW ENOUGH TRAFFIC IN FROM THE FAR SOUTH AND WHITCHURCH PEOPLE WONT DRIVE OUT TO THEN HAVE TO FIGHT BACK IN AGAIN DOWN THE A37. BUSES CANNOT GET THERE ANY QUICKER THAN CARS - EVEN WITH THE BUS LANE IN KNOWLE INBOUND DUE TO THE STOPPING AND NARROWNESS OF THE A37.</p> <p>LEAVE THE GREENBELT, STOP ADDING POLLUTION AND POUT HOUSES NEAR URBAN SPRAWL = BATH. PUT A SMALL NUMBER INTO AND AROUND WHITCHURCH FOR LOCAL PEOPLE AT AFFORDABLE PRICES = PROTECT THE VILLAGE.</p>

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ALSO NO THOUGHT AS TO THE WRECKING OF THE PLAYGROUND, THE CRICKET GROUND (97YEARS OLD) AND THE RUGBY/FOOTBAL AT NORTON LANE - 1000'S USE THIS EVERY YEAR AND WILL MEAN THE END OF WHITCHURCH CC AS THERE WILL BE NO ALTERNATE SITE IN THE VILLAGE....

YOU HAVE NO IDEA OF THE ANGST AND EMOTION IN THIS AREA - BE VERY PREPARED FOR CHALLENGE AT EVERY STEP OF THE WAY AND IT WILL BE CHALLENGE AT A LEVEL NEVER EVER SEEN BEFORE EITHER!

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	MR DAVID MILLARD
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS5 - Other comments on Chapter 3
<b>Comment</b>
<p>MY COMMENTS RELATE TO THE FULL CHAPTER AND HOW ILL ADVISED AND THOUGHT THROUGH IT IS:</p> <p>WHITCHURCH VILLAGE CANNOT HANDLE 2500 MORE HOMES = 10,000 PEOPLE. THE INFRASTRUCTURE IS NOT THERE. IT SHOULD TAKE 200-300 AND HAVE THESE AS AFFORDABLE HOMES AND FOR LOCALS ONLY.(ACTION MEETING 27/11 HAD VERY FEW UNDER 40'S AS THESE CANNOT AFFORD TO LIVE LOCALLY!!). A POINT TO NLTE AND ACT UPON...</p> <p>THE RING ROAD FROM HICKS GATE WILL SPLIT THE GREENBELT AND DAMAGE THE ALLOTMENTS AND THE LOCAL AREA - WITH NOISE AND POLLUTION. IT WILL SEE CARS COMING UP FROM THE A4 TO TRY THE A37 ROUTE INTO BRISTOL. IT WILL ADD TO THE WOES OF THE VILLAGE AND THE A37 NOT IMPROVE THEM - MORE RISK FOR THE CHILDREN AT THE SCHOOL!!</p> <p>THE PLANNERS AT THE WHITCHURCH HALL MEETING HAD NO IDEA OF THE TRAFFIC ALREADY HERE AND THE TIMES ON THE BOARD FROM 2013 TO BE FRANK ARE IMPOSSIBLE. THEY WERE MODELLED I WAS TOLD AND NOT ACTUALLY DRIVEN - MAYBE YOU SHOULD TRY THAT... THE TWO ROUTES FROM THE A37 ACROSS FIELDS (GREENBELT) INTO WHITCHURCH LANE ARE TO BE FRANK SURELY A JOKE. INTO 20MPH ZONES NOT WIDE ENOUGH FOR HGV'S AND THATS WHAT WILL HAPPEN!! PLUS PAST A 1000 PUPIL SCHOOL, WITH ONE PROPOSED ROUTE BEING PAST TWO OF IT'S THREE SIDES!! NO THOUGHT AS TO HOW THE ROADS WILL BE JOINED UP AND I QUOTE A PLANNER "THAT WILL BE BRISTOL'S PROBLEM NOT OURS". SO TRY AND DUMP 2500 NEW HOMES THE FARTHEST FROM BATH POSSIBLE, COLLECT THE COUNCIL TAX AND HAVE BRISTOL PICK UP ALL THE ISSUES.</p> <p>A NEW PARK AND RIDE NEAR THE A37 - WHY? WHO WILL USE IT? THERE WILL BE ONE AT HICKS GATE - YOU DONT NEED TWO!! THERE IS NOW ENOUGH TRAFFIC IN FROM THE FAR SOUTH AND WHITCHURCH PEOPLE WONT DRIVE OUT TO THEN HAVE TO FIGHT BACK IN AGAIN DOWN THE A37. BUSES CANNOT GET THERE ANY QUICKER THAN CARS - EVEN WITH THE BUS LANE IN KNOWLE INBOUND DUE TO THE STOPPING AND NARROWNESS OF THE A37.</p> <p>LEAVE THE GREENBELT, STOP ADDING POLLUTION AND POUT HOUSES NEAR URBAN SPRAWL = BATH. PUT A SMALL NUMBER INTO AND AROUND WHITCHURCH FOR LOCAL PEOPLE AT AFFORDABLE PRICES = PROTECT THE VILLAGE.</p>



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ALSO NO THOUGHT AS TO THE WRECKING OF THE PLAYGROUND, THE CRICKET GROUND (97YEARS OLD) AND THE RUGBY/FOOTBAL AT NORTON LANE - 1000'S USE THIS EVERY YEAR AND WILL MEAN THE END OF WHITCHURCH CC AS THERE WILL BE NO ALTERNATE SITE IN THE VILLAGE....

YOU HAVE NO IDEA OF THE ANGST AND EMOTION IN THIS AREA - BE VERY PREPARED FOR CHALLENGE AT EVERY STEP OF THE WAY AND IT WILL BE CHALLENGE AT A LEVEL NEVER EVER SEEN BEFORE EITHER!

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**Representations received online:**

**Respondent**

<b>Name</b>	Mr & Mrs A Moores
<b>Agent (if applicable)</b>	WPB Mr N Whitehead

**Comment**

<b>Local Plan Section/Chapter</b>
Any other comments
<b>Comment</b>
See attached Report

**Attachments Included**

[http://www.bathnes.gov.uk/sites/default/files/webform/lpbnes-\\_behalfof\\_mmam.docx](http://www.bathnes.gov.uk/sites/default/files/webform/lpbnes-_behalfof_mmam.docx)

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**Representations received online:**

**Respondent**

<b>Name</b>	Mr David Morrison
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS3 - Combination of locations outside and within the Green Belt
<b>Comment</b>
<p>3.5 - An unfortunate reality. The Council should really consider after District Valuation the compulsory purchase, of all HELAA land it sees as developable. Both commercial and residential, as an option, to achieve the "Council's broader aspirations". Than leave it to an unknown open unaffordable market result.</p> <p>3.5.2 - To be truly sustainable. If development is directed by known local need, then housing type will to some extent control whether primary school places are needed. However, demographics and existing types of dwellings in villages would suggest that past primary school capacity for the village needs to be taken into consideration before determining type and number of new houses. This then caters for the changing community needs driven by existing housing changing hands.</p> <p>Where it is clear that capacity in the school has been unable to cope with the village need in the past and there is no scope to practically expand the school site, new housing before 2036 should not be considered unless the scale of that new development provides for a new primary school site.</p> <p>3.6 - To give some certainty to delivering the goals of the Local Plan the Council needs control of as much of the land as possible in advance. The Council itself needs to compulsory purchase the land areas identified in the HELAA to achieve the "Council's broader aspirations" for the people and communities.</p> <p>3.6.1 - Public transport provision will only be short term and literally transitory if people do not use it. Seeking contributions from developers to only pump prime a service will not provide the certainty necessary that services will always be available for the lifetime of the development. Housing development should not occur along transport routes where currently less than 10% of the current local population do not use public transport.</p> <p>Tipping current thoughts upside down, sustainability is more likely to be achieved where commercial and office space is only permitted to be built on sustainable transport routes. Further, if recreational facilities were also on these types of routes all the better.</p> <p>3.6.3 - Vitality to sustain communities will not be achieved if development is pushed to the outskirts of current village boundaries that are contained by physical barriers. To be truly "sustainable" in rural village locations then new communities must be built more closely around the centre. To put new community housing beyond major road or other physical barriers from the existing village centre</p>

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will encourage outward looking movement. Thus dragging the social network of the village community even further away from the centre. To take an outward moving and looking approach in rural villages will not achieve re-invigoration of those village communities.

3.7.1 - Not yet determined is how to deal with Temple Cloud air pollution problem, the by-pass option currently shelved by the single motion put forward by one BANES Councillor. This route to by pass Clutton and Temple Cloud should be brought back to the table, paid for through new development as the opportunity exists through the identified HELAA land put forward. Areas of the land put forward under the HELAA by landowners covers a significant area identified for the by-pass route and realistic payment for the land for holistic development either side of the corridor would provide, with a reasonable price for the land, the monies needed for the infrastructure.

Trees and woodland edge planting amongst the housing as open space should be a Local Plan requirement for all development sites adjacent to green field, agricultural land or woodland. Further a requirement for a minimum 30 metre buffer zone on the development site between the built environment and open countryside.

3.7.3. - Before development is allocated an up-to date audit should be undertaken. The scope of such should revisit the RA statues of villages, do the villages still have those facilities surveyed some years ago. Some Parish Council have supported closure of shops for unknown reasons.

3.7.4 - It is sustainable if development is directed by known local need, then housing type will to some extent control whether primary school places are needed. However, demographics and existing types of dwellings in villages would suggest that past primary school capacity for the village needs to be taken into consideration before determining type and number of new houses. This then caters for the changing community needs driven by existing housing changing hands.

3.7.5 - Location of public transport directly adjacent to the houses discourage walking exercises to get to the bus. A bus stop or any public transport stop should be located a 10 minute walk from houses and vice versa to encourage healthy traits and environments.

An communities that are adjacent to disused railway lines should lobby for these to be turned into recreational and/or shared route open space in the interests of health and safety.

3.7.7 - Not yet determined, how to deal with Temple Cloud air pollution problem, the by-pass option currently shelved. This route to by pass Clutton and Temple Cloud should be brought back to the table, paid for through new development as the opportunity exists through the identified HELAA land put forward. Areas of the land put forward under the HELAA by landowners covers a significant area identified for the by-pass route and realistic payment for the land for holistic development either side of the corridor would provide, with a reasonable price for the land, the monies needed for the infrastructure.

3.8.3 -The assumption to favour green-field sites put forward through the HELAA as less damaging, expensive and more sustainable to develop than Brownfield sites might in some instances be flawed.

Ancillary works of access and connectivity, visual and practical with existing infrastructure and countryside may prove as difficult to solve. Giving considerable thought and less onerous costly solutions, say through lessaer S106, 38 and 238 contributions where Brownfield sites are used will encourage their development over Greenfield in the first instances.

Further, there are areas within the greenfield land put forward in the HELAA that is not developable

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**Representations received online:**

as residential property without similar amelioration of Brownfield land. For example recently tipped land that would not be settled before 2036. Further there are areas of tipped material on greenfield land being offered as part of the HELAA whose heavy metal content exceeds the measure that would allow residential development. The Council has a duty to disclose areas of greenfield land put forward in the HELAA it knows may not be immediately available for building residential housing without amelioration. Caveat Emptor!

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**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr David Morrison
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
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CHAPTER 3 - Spatial Strategy including the rural areasSS4 - Review of Rural Areas Site Allocations

<b>Comment</b>
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I have tried to be objective in my consultation comments below regarding the broader elements of the Plan. However, commenting further on the Draft document seems fairly pointless for the reason at 3.8.5 without this “further work” mentioned. The further work mentioned needs to be done and then consultation can be informed, objective and meaningful.

It seems that this consultation is premature. My overarching comment therefore at this point is to introduce another option to address the need for sustainable residential and commercial property along with all the community entitled facilities. Build a new town in North-east Somerset along garden city lines or concentrate a similar concept with properly built housing and properly supported infrastructure and green infrastructure around Midsomer Norton and Radstock. That these areas can be truly sustainable communities through this and the next century. An exemplar of holistic development built around Employed, Heathly, Vibrant and Inclusive communities.

There seems no place in the Draft to state that remember trees and other plants are great pollution absorbers. Further, trees and woodland edge planting amongst the housing and built infrastructure as open space should be a Local Plan requirement for all development sites adjacent to green field, agricultural land or woodland. Further a requirement for a minimum 30 metre buffer zone on the development site between any built environment and open countryside, to maintain, enhance or provide new wildlife corridors.

My further comments are thus:

2.5.1 - “Protect and care for our most vulnerable”; “Nurture residents, health, safety and well being”; “Provide ways for everyone in the community to reach their potential”.

By publishing the HELAA maps before the Local Plan means it is highly likely that prospective developers have already taken purchase options on the land put forward by the landowners, subject to obtaining planning permission.

The developers will have undertaken feasibility and costing plans of their own. This more than anything will determine whether the Council’s Values and Priorities will be achievable and deliverable. This probable scenario almost seems to have already been supported by comments in this Draft Plan at 3.5

An unfortunate reality, the Council itself should really consider compulsory purchase as an option to

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achieve the "Council's broader aspirations". Than leave it to an open unaffordable market result.

Another way might be to work with the developer providers early on in the process so the Local Plan becomes an inclusive document rather than just advisory and challengeable.

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HELAA land offers the possibility of providing the most costly part of a new house, the land it sits upon. HELAA land is clearly no longer needed by the owner, it is surplus to their requirements. A fair price should be paid, but there is opportunity to provide new housing in BANES at an "affordable" cost if the developments most expensive element, the land, is purchased at reasonable cost.

BANES and/or Parish Council both of whom have the statutory right to hold and own land for the purpose of public good. Should seek to purchase, compulsory if necessary, the land offered under the HELAA.

Given that the land put forward is deemed surplus to the business or agricultural requirements of the landholders it currently serves. Any land under this auspices should be available at a fair but market price for the use it last or currently serves.

This way the value of the land asset is distributed fairly, the cost of housing is kept at a realistic controlled price for rent, part ownership or purchase and provision of community facilities is able to be built into the fabric of a development rather than an afterthought. To provide this holistically for the North-East Somerset community is an appropriate way forward in all respects.

District or Parish Councils failing to take this approach could at least ensure that new developments do not lead to desertification by ensure proper and appropriate green space and trees are provided for and a third of the development, excluding roads are green space with 20% of the development land tree covered where greenfield sites are used.

3.5 - An unfortunate reality, the Council itself should really consider after District Valuation the compulsory purchase, of all HELAA land it sees as developable. Both commercial and residential, as an option, to achieve the "Council's broader aspirations". Than leave it to an unknown open unaffordable market result.

3.5.2 - To be truly sustainable. If development is directed by known local need, then housing type will to some extent control whether primary school places are needed. However, demographics and existing types of dwellings in villages would suggest that past primary school capacity for the village needs to be taken into consideration before determining type and number of new houses. This then caters for the changing community needs driven by existing housing changing hands.

Where it is clear that capacity in the school has been unable to cope with the village need in the past and there is no scope to practically expand the school site, new housing before 2036 should not be considered unless the scale of that new development provides for a new primary school site.

3.6 - To give some certainty to delivering the goals of the Local Plan the Council needs control of as

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much of the land as possible in advance. The Council itself needs to compulsory purchase the land areas identified in the HELAA to achieve the "Council's broader aspirations" for the people and communities.

3.6.1 - Public transport provision will only be short term and literally transitory if people do not use it. Seeking contributions from developers to only pump prime a service will not provide the certainty necessary that services will always be available for the lifetime of the development. Housing development should not occur along transport routes where currently less than 10% of the current local population do not use public transport.

Tipping current thoughts upside down, sustainability is more likely to be achieved where commercial and office space is only permitted to be built on sustainable transport routes. Further, if recreational facilities were also on these types of routes all the better.

3.6.3 - Vitality to sustain communities will not be achieved if development is pushed to the outskirts of current village boundaries that are contained by physical barriers. To be truly "sustainable" in rural village locations then new communities must be built more closely around the centre. To put new community housing beyond major road or other physical barriers from the existing village centre will encourage outward looking movement. Thus dragging the social network of the village community even further away from the centre. To take an outward moving and looking approach in rural villages will not achieve re-invigoration of those village communities.

3.7.1 - Not yet determined is how to deal with Temple Cloud air pollution problem, the by-pass option currently shelved by the single motion put forward by one BANES Councillor. This route to by pass Clutton and Temple Cloud should be brought back to the table, paid for through new development as the opportunity exists through the identified HELAA land put forward. Areas of the land put forward under the HELAA by landowners covers a significant area identified for the by-pass route and realistic payment for the land for holistic development either side of the corridor would provide, with a reasonable price for the land, the monies needed for the infrastructure.

Trees and woodland edge planting amongst the housing as open space should be a Local Plan requirement for all development sites adjacent to green field, agricultural land or woodland. Further a requirement for a minimum 30 metre buffer zone on the development site between the built environment and open countryside.

3.7.3. - Before development is allocated an up-to date audit should be undertaken. The scope of such should revisit the RA statues of villages, do the villages still have those facilities surveyed some years ago. Some Parish Council have supported closure of shops for unknown reasons.

3.7.4 - It is sustainable if development is directed by known local need, then housing type will to some extent control whether primary school places are needed. However, demographics and existing types of dwellings in villages would suggest that past primary school capacity for the village needs to be taken into consideration before determining type and number of new houses. This then caters for the changing community needs driven by existing housing changing hands.

3.7.5 - Location of public transport directly adjacent to the houses discourage walking exercises to get to the bus. A bus stop or any public transport stop should be located a 10 minute walk from houses and vice versa to encourage healthy traits and environments.

An communities that are adjacent to disused railway lines should lobby for these to be turned into recreational and/or shared route open space in the interests of health and safety.



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**Representations received online:**

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Ancillary works of access and connectivity, visual and practical with existing infrastructure and countryside may prove as difficult to solve. Giving considerable thought and less onerous costly solutions, say through lessaer S106, 38 and 238 contributions where Brownfield sites are used will encourage their development over Greenfield in the first instances.

Further, there are areas within the greenfield land put forward in the HELAA that is not developable as residential property without similar amelioration of Brownfield land. For example recently tipped land that would not be settled before 2036. Further there are areas of tipped material on greenfield land being offered as part of the HELAA whose heavy metal content exceeds the measure that would allow residential development. The Council has a duty to disclose areas of greenfield land put forward in the HELAA it knows may not be immediately available for building residential housing without amelioration. Caveat Emptor!

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8.2.1. - SU1 - Warning! Where sustainable drainage is used unless there is a prepaid pre- prepared programme for the life of the development, 80 years, the drainage system will never perform as designed or intended.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
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**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr David Morrison
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
Any other comments
<b>Comment</b>
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**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
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**Representations received online:**

**Respondent**

<b>Name</b>	Mr Ben Moss
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
<p>I am benefiting from the development already permitted in Whitchurch Village. I am not going to be hypocritical and now try and block further developments as housing is clearly needed.</p> <p>What I would say is the the new village that is proposed needs to have good pathways connecting it to Whitchurch Village so the new amenities are accessible for existing residents without having to use a car.</p> <p>But on the transport issues, the one thing I would oppose is the proposed connecting road from the A37 onto Whitchurch Lane. Neither option is suitable, but especially the one that brings the traffic on to Halfacre Lane at the back of the school. Whitchurch Lane is incredibly busy already and is a single lane, residential road with speed humps all the way along and a 20mph speed limit in places. This is not suitable to become part of the south Bristol ring road. A new option should be looked for immediately.</p> <p>I also have concerns about the lack of planning for traffic heading in and out of Bristol on the A37. Creating a ring road may help, but many people simply need to get in and out of Bristol. Other than a park and ride (which have limited success in Bath and Bristol) I don't see any options for how traffic going in an out of the city will be reduced.</p> <p>Thank you for taking the time to consider my comments.</p>



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	mr derek moss
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
<p>I should like to state that I am totally opposed to the link road from hicks gate roundabout linking upto whitchurch lane. This will cause gridlock on an already over used road that already has traffic problems at its current levels which will also cause greater carbon immissions in the area,we already have an airport that is going to double in size causing god knows what carbon immissions and now you are propposing to increase road traffic in the area you have got to be out of your trees to push this proposal forward.</p> <p>WE ARE SUPPOSED TO BE TRYING TO WARD OFF GLOBAL WARMING FOR ARE CHILDRENS FUTURE THESE DEVELOPMENTS ARE ONLY GOING TO INCREASE IT. I THOUGHT BRISTOL WAS AIMING TO BE CARBON NEUTRAL BY 2030 THIS IS ONLY GOING TO INCEASE IT AS I SAID BEFORE YOU MUST BE OUT OF YOUR TREES.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Susan Nellany-Gibbs
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 7 - Somer ValleySOM4 - Other comments on Chapter 7
<b>Comment</b>
RAD25 RAD26 should NOT be allocated for housing development. This would be critically damaging to Writhlington Village and the town of Radstock, drastically altering the community in a negative way and overloading all the surrounding roads which are already struggling and unsafe. These plots should be kept as farmland.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
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**Respondent**

<b>Name</b>	Mr Terry Nichols
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH4 - Housing
<b>Comment</b>
The proposed housing development does not include a viable infrastructure. The A37 is inadequate to carry any more traffic into Bristol

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Terry Nichols
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
The plans for transport are woefully inadequate.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
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**Respondent**

<b>Name</b>	Mrs Anne Nock
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH1 - Strategic Planning Framework
<b>Comment</b>
I disagree with building on greenbelt land. The posposed developments in and around the Whitchurch area will totally change the character of the area. Extra housing will increase pressure on road systems. We do not want or need extra building on this scale in this area. Our green spaces need to be protected. Mental health is important to our community. Buidling extra houses on this scale and distroying farmland and green areas is not good for our area. Roads, doctors surgeries and schools are already under pressure.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr James Nock
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH4 - Housing
<b>Comment</b>
I am against the development of our greenbelt. We moved here to be away from City life and dont want to be surrounded by houses and concrete.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
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**Respondent**

<b>Name</b>	Mr James Nock
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH4 - Housing
<b>Comment</b>
I dont agree with building on the green belt. We moved away from the City and dont want to be surrounded by housing again. Building on this scale will change the area in a bad way.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Faye Notton
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH12 - Other comments on Chapter 6
<b>Comment</b>
<p>I think it is appalling to divert so much traffic through a rural part of Bristol. It is a mistake to bring so much traffic past bridge farm primary school with such young children around. I think it is an absolute disgrace to endanger our children in this way. It will effectively cut off two of the three main entrances and exits for the school as it will be far too dangerous to use them if this new road goes ahead at any place within whitchurch. I am sure the school itself have raised their grave concerns over your plans and the safety of the children. I also think that bringing the ring road traffic through Whitchurch itself is a big disappointment as this is a rural part of Bristol and all residents that live here here live here for the quietness and countryside feel to the area, it is a great local community with great support. Putting a busy road through the heart of it will just destroy the community and I fear that residents will then be forced to move to regain there love in a community such as Whitchurch is now. Also I think this will have a dramatic effect on lowering house values as currently Whitchurch is a very quiet and safe place to be. This will totally change if this road goes ahead and I just think this has not been thought out at all. The new developments of houses will already bring a lot of new traffic to the area, we then donâ€™t want extra main roads build where crossing the roads will become a danger with such high volume cars and lorries speeding past. Currently I can open my doors and hear nothing, itâ€™s beautiful and peaceful I do not wish this to change into a high hum of speeding traffic where we become afraid to let our kids play.</p> <p>I along with everyone I know in my area and through school are utterly disgusted and disappointed in these plans for Whitchurch!</p>



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Rob Oldfield
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
Option 1. I would be concerned that any housing might end up turning into HMOs.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Rob Oldfield
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
While a large part of Bath's economy is based on the tourist industry, it is too focused on that. I feel it would be better to support other industries other than hotels and tourist accommodation. More control needs to be put in place over AirBnB type accommodation. If this requires legislation from central government then lobbying for that needs to be a priority.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Aileen Oldfield
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
I would prefer to go for developing the area for mixed industrial and housing however something will need to be put in place to prevent properties from being transformed into student housing.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Aileen Oldfield
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
The use of brownfield sites for residential housing and previously discounted sites are both acceptable but I would worry about intensifying existing housing sites as the quality of life could be effected detrimentally if this is not done sensitively and with the consultation of existing residents.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Aileen Oldfield
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
Again I feel we have enough hotels now in Bath, I would also like to see a lobbying of the government to change the law for so called party houses and air B&B's where this takes out of residential use much needed housing, the nuisance and detrimental effect on community, health, safety and fire risks as these properties aren't licensed and lack of meaningful revenue for the local council, as they are being ran as a business but not paying business rates and not complying to any regulations.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Aileen Oldfield
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
<p>I agree that any new research facilities for the universities should be denied outside of the campus's and only should they expand on their campuses as far as room permits. When tenure ends then that tenancy should be terminated and the premises revert back to use by the wider residents/ business of Bath.</p> <p>Also I strongly feel that future student accommodation should be built on campus and ALL applications for student housing should be denied outside of that. I also feel that the individual flats/rooms in all the PBSA should count in the percentage of student properties allowed under article 4. I also feel strongly that the council should stop rubber stamping renewed applications for existing HMO's and deny these on the grounds that the students have the opportunity to live in one of the existing PBSAs. I agree with point 3</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Aileen Oldfield
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
I agree that the rent on these properties should be a fair rent and they should NOT be allowed to be used as air B&B's during holidays.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Aileen Oldfield
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
I agree that PBSA use needs to be monitored and a strategy put in place to revert them to residential use should they fall out of student use. However if this should happen I still feel that no more HMO's should be given licences.



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Aileen Oldfield
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
<p>I feel that both campuses should not be allowed to over develop their sites, nor develop the sites to a point that the development impacts the surrounding area in a detrimental way. I also feel strongly that the green belt status of both sites needs to be maintained. I also feel that any additional building on the Claverton down campus should be subject to business rates and not be included in the original contract. In fact I would also urge the council to seek the governments aid in dissolving that contract.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Aileen Oldfield
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
<p>I feel that both campuses should not be allowed to over develop their sites, nor develop the sites to a point that the development impacts the surrounding area in a detrimental way. I also feel strongly that the green belt status of both sites needs to be maintained. I also feel that any additional building on the Claverton down campus should be subject to business rates and not be included in the original contract. In fact I would also urge the council to seek the governments aid in dissolving that contract.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Aileen Oldfield
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
<p>Whilst I agree that the park &amp; ride needs to be encourage, I am weary of expanding on land that is presently green belt as once this land is removed from green belt it will be lost forever and it will set a precedent and would make a hard case for the council denying the universities permission to expand onto green belt for example or any other developer from doing so.</p> <p>I am also worried about the constant mention of an eastern Park &amp; ride, as there seems there is no suitable brownfield site for this to be situated.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Aileen Oldfield
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
<p>NO!!!! Do not remove green belt land for rubbish and recycling, we need all the green belt we have to aid with the air quality in Bath.</p> <p>Hastings council have a system where every 6 weeks they send a truck round on rubbish/ recycling day to pick up all large household waste from the curbside. BANES should think seriously about this and trial this both in Bath and in an area outside of Bath.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Aileen Oldfield
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
<p>Once again I would stress that the impact of have two ever expanding universities in the town must be addressed by denying both universities any more building/, acquiring of premises in Bath. To deny them both permission to expand their current campuses onto green belt and to curtail any building on campus that will be detrimental to the surrounding environment and to stop the rubber stamping of HMO's in Bath.</p> <p>I also think that a proper policing of student owned cars need to be put in place as students in PBSA tend to bring their cars, contrary to their contracts, and park them in residential streets. This has the effect of blocking roads and making the passing of emergency vehicles difficult as well as having a negative effect for the regular residents.</p> <p>The moving of the recycling centre has to be considered from the perspective of those of us who use it but get there on foot as we don't own a car. Will this lead to more fly tipping? In order to comply with the spirit of CAZ I think it would be a good idea to trial the Hastings approach to larger household waste as mentioned above in section BTH10.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Rob Oldfield
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
<p>I believe that the universities have grown beyond a reasonable size for a city the size of Bath. They are swamping the economy and that has obvious potential problems should they fail. It really is time to do whatever is possible to limit any further growth. Hence I'd go for option 1 but feel it doesn't go far enough. What, for example, is there to stop the universities moving admin departments from campus into town and thus creating more space on campus for further growth?</p> <p>The mention of nomination agreement also needs further clarification about what the terms of those agreements would be.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Rob Oldfield
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
Disallowing use of PBSAs as AirBNBs is definitely a good idea.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Rob Oldfield
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
Fully agree with planning to move PBSAs back to non student residential. I'm aware that there is a housing shortage for young workers " I believe it would be sensible to allow non students to live in the PBSAs.



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Rob Oldfield
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
I fail to see any circumstances that would justify the removal of Bath Spa from the green belt.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Rob Oldfield
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
Leave the existing system of needing a planning application for new park and ride provision in place. I feel that we need to continue that in order to protect against the lunacy shown by the most recent proposals for Bathampton Meadows.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Rob Oldfield
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
We don't have a car. At present if we have items that need to go to the tip, we can carry them or push in a wheelbarrow. That's not going to work if the site is at Odd Down. We have seen " in Hastings " a system where goods are picked up from doorsteps. That was much more widely used than the existing collection options in place in Bath. Please consider improvements to that waste collection service.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Rob Oldfield
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
SB4 Bath Quays North  Will the policy be expanded to continue shut down of riverside access if it is shown that a drunk person is at risk of falling into the water? Will a bill for this cost be sent to the universities if it is thought that it is primarily students who need to be protected from their own stupidity?  SB8 Western Riverside  It's now two years since the new destructor bridge was completed and it's still closed. Crazy.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Rob Oldfield
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
<p>A few items that I think should be considered, some of which might need lobbying central government to make possible:</p> <p>Renegotiate the rent that the universities pay the council.</p> <p>Reintroduce a cap on number of students at the universities.</p> <p>There is little here to indicate any reduction in areas that are saturated with HMOs. Hence review how HMO licences are awarded and function. For example, if an HMO property is sold, then the existing licence is revoked and would need to be applied for as a new application. Require HMO licences to be renewed every three years.</p> <p>Council tax. It is crazy that HMOs pay no money to support council services. The houses are businesses and should be charged as such.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Ms Rosalyn Olive
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH2 - Whitchurch SDL Garden City Principles
<b>Comment</b>
GREEN BELT !!!!

**Attachments Included**

<http://www.bathnes.gov.uk/sites/default/files/webform/aecc1b8e-c4df-42cd-a304-5b8519b91ae6.png>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Philippa Paget
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 5 - Keynsham and North Keynsham Strategic Development Location (SDL)KSM11 - Other comments on Chapter 5
<b>Comment</b>
<p>The villages including Queen Charlton, Chewton Keynsham, Compton Dando and the town of Keynsham are already experiencing deterioration in our quality of life due to increased housing. The full impact of the houses that are being built at the moment is not yet known.</p> <p>Loss of and impact on natural environment and ecology is evident, increase in noise including from air traffic, nighttime light pollution, dangerous rat running in our lanes making walking and cycling unpleasant and dangerous, health services are over stretched (Southmead Hospital is already too small).</p> <p>Bus transport should be free to all as this would be better for the environmental sustainability. More roads make more traffic. More roads don't solve the issues as there is always another bottle neck area. More busses, smaller busses, more frequently. Raise the driving age to 18 or 19 years so young people get the public transport habit.</p> <p>The Keynsham and North Keynsham Strategic Development Locations are all unsustainable and none of them suitable. No more Greenbelt land should be allowed for development and the principals the Greenbelt upheld to check unrestricted urban sprawl, to stop towns and villages merging and to safeguard our countryside. In particular protecting for future generations the special character of the Chew Valley.</p> <p>I do not agree that provision of compensatory habitat is in anyway a 'net environmental gain'. these areas should simply not be developed.</p> <p>I DO NOT AGREE WITH THE GOVERNMENT ASSESSMENT OF 'HOUSING NEED'. THE CALCULATIONS ARE FLAWED.</p> <p>BROWNFIELD SITES BEFORE GREEN FIELD - releasing more green field sites for development will allow developers to 'Cherry Pick' the easiest sites</p> <p>ALL FUTURE HOUSING MUST BE LEGISLATED FOR ZERO CARBON CONSTRUCTION. More use of alternative homes such as communal living, small units such as log cabins and other constructions which would be truly affordable both in financial and environmental terms. Large housing developers need to be better regulated to achieve this.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Philippa Paget
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH12 - Other comments on Chapter 6
<b>Comment</b>
- Whitchurch and adjacent villages including Queen Charlton, Chewton Keynsham, Compton Dando and the town of Keynsham are already experiencing deterioration in our quality of life due to increased housing. The full impact of the houses that are being buil



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr H. John Paget
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH12 - Other comments on Chapter 6
<b>Comment</b>
<ul style="list-style-type: none"> <li>- Whitchurch and adjacent villages including Queen Charlton, Chewton Keynsham, Compton Dando and the town of Keynsham are already experiencing deterioration in our quality of life due to increased housing. The full impact of the houses that are being built at the moment in Whitchurch and Keynsham area is not yet known.</li> <li>- Loss of and impact on natural environment and ecology is evident, increase in noise including from air traffic, night time light pollution, dangerous rat running in our lanes making walking and cycling unpleasant and dangerous, health services are over stretched (Southmead Hospital is already too small) and many more impacts.</li> <li>- Bus transport should be free to all as this would be better for the environmental sustainability. More roads make more traffic. More roads don't solve the issues as there is always another bottle neck area. More busses, smaller busses, more frequently. Raise the driving age to 18 years so young people get the public transport habit.</li> <li>- Whitchurch Strategic Development Location is unsustainable and very unsuitable.</li> <li>- No more Greenbelt land should be allowed for development and the principals of the Greenbelt upheld to check unrestricted urban sprawl, to stop towns and villages merging and to safeguard our countryside. In particular protecting the historic countryside character for future generations.</li> <li>- I strongly disagree that provision of compensatory habitat is in anyway a 'net environmental gain'. these areas should simply not be developed.</li> <li>- I DO NOT AGREE WITH THE GOVERNMENT ASSESSMENT OF 'HOUSING NEED'. THE CALCULATIONS ARE FLAWED.</li> <li>- BROWNFIELD SITES BEFORE GREEN FIELD - releasing more green field sites for development, will allow developers to 'Cherry Pick' the easiest sites.</li> <li>- ALL FUTURE HOUSING MUST BE LEGISLATED FOR ZERO CARBON CONSTRUCTION. More use of alternative homes such as communal living, small units such as log cabins and other constructions which would be truly affordable both in financial and environmental terms. Also community cohesion and mental health. Large housing developers need to be better regulated to achieve this.</li> </ul>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr H. John Paget
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 5 - Keynsham and North Keynsham Strategic Development Location (SDL)KSM11 - Other comments on Chapter 5
<b>Comment</b>
<p>All these sites are unacceptable.</p> <p>Additional roads would alter traffic flow, but not solve anything. More roads bring the bottle-necks to different locations, they don't solve the issues. Investment in buses would be less expensive in terms of the environment and financially. Bus transport free to all would be better for environmental sustainability. More roads make more traffic. More busses, smaller busses, more frequently. Raise the driving age to 18 or 19 years so young people get the public transport habit.</p> <ul style="list-style-type: none"> <li>- The Keynsham Strategic Development Locations CDAN 34,36,02,20,24,25 and 27 are all unsustainable and all are very unsuitable. No more Greenbelt land should be allowed for development and the principals the Greenbelt upheld to check unrestricted urban sprawl, to stop towns and villages merging and to safeguard our countryside. In particular protecting for future generations the special character of the Chew Valley.</li> <li>- I do not agree that provision of compensatory habitat is in anyway a 'net environmental gain'. these areas should simply not be developed.</li> <li>- Villages including Queen Charlton, Chewton Keynsham, Compton Dando, Burnett and the town of Keynsham are already experiencing deterioration in our quality of life due to increased housing. The full impact of the houses that are being built at the moment is not yet known. Loss of and impact on natural environment and ecology is evident, increase in noise including from air traffic, night time light pollution, dangerous rat running in our lanes making walking and cycling unpleasant and dangerous, health services are over stretched (Southmead Hospital is already too small).</li> <li>- I DO NOT AGREE WITH THE GOVERNMENT ASSESSMENT OF 'HOUSING NEED'. THE CALCULATIONS ARE FLAWED.</li> <li>- BROWNFIELD SITES BEFORE GREEN FIELD - releasing more green field sites for development will allow developers to 'Cherry Pick' the easiest sites</li> <li>- ALL FUTURE HOUSING MUST BE LEGISLATED FOR ZERO CARBON CONSTRUCTION. More use of alternative homes such as communal living, small units such as log cabins and other constructions which would be truly affordable both in financial and environmental terms. Large housing developers need to be better regulated to achieve this.</li> </ul>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Jeremy Palmer
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
The purposed site for development rad25 and rad26 is not a suitable site. There's hardly no provisions for the schools that are already in this area. Having more house's and people would be a big concern to the local community and their safety

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr & Mrs Palmer
<b>Agent (if applicable)</b>	Stride Treglown Miss Lauren Cook

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS3 - Combination of locations outside and within the Green Belt
<b>Comment</b>
<p>For BANES the West of England Joint Spatial Plan places a requirement on the Council to deliver 700 dwellings through non-strategic growth over the plan period. The Consultation Local Plan presents 3 options for accommodating the non-strategic growth in the area.</p> <p>The first two options (SS1 and SS2) suggest how non-strategic growth could be accommodated on land outside the Green Belt. The third option (SS3) is presented as the fallback position if the first two options are found to be undeliverable or unsustainable. SS3 identifies that if exceptional circumstances can be demonstrated the Local Plan could identify land to be removed from the Green Belt and allocate sites for development.</p> <p>SS3 highlights that this approach would focus on the most sustainable locations including suitable opportunities around Bath. Irrespective of whether SS1 or SS2 is the preferred approach to non-strategic growth, the Council will need to ensure housing land supply across a range of settlements with a focus on the most sustainable locations.</p> <p>Having regard to SS3, it is considered that Bath is the most sustainable location for non-strategic growth and the site search focus should extend beyond the previously developed land within the city limits. Opportunities do exist on the edge of Bath to bring forward non-strategic residential growth that is currently within the Green Belt that at the planning application stage could be judged to be appropriate development in accordance with Paragraph 145 of the NPPF.</p> <p>One such site is Bath Equestrian Centre, Weston. This site has the ability to provide 26 dwellings on previously developed land within the Green Belt. Further details regarding the ability of the site to deliver this quantum of development are included within the HELAA 2018 Call for Sites submission submitted concurrent to this representation.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Alison Parker
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)
<b>Comment</b>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Alison Parker
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH12 - Other comments on Chapter 6
<b>Comment</b>
<p>I am Writing to register my concerns and I strongly object to the planed development south of Whitchurch, the south Orbital Highway link and the proposed Park and Ride on the A37 as outlined in your plan 2016 - 2036.</p> <p>To build 2500 new houses on green belt land on the outskirts of Whitchurch Village that is home to a range of wildlife whose habitat are forever under threat and whose disappearance could have a long time effect on the local ecology and eco systems. Building this development means at least 2500 residents more likely 5000 so at least 2500 more cars add to that commercial vehicles all adding to already high pollution, noise and an unwelcome increase in traffic.</p> <p>Local services are already stretched in the Whitchurch/Stockwood area further development without adding additional facilities such as Doctors, Dentists and local shops will have a massive impact on residents already living in the area..</p> <p>In relation to the South Orbital Highway whoever thought this would be a good idea obviously has NO understanding of problems that already exist for residents and road users, I was told a traffic survey was done between 8am and 9 am this should of been done between 6am and 19.30 pm !</p> <p>Whitchurch Lane is not wide enough for the extra traffic that will be directed onto it from the road from Hicksgate , there is a 7.5 weight restriction also 20 mph and speed humps in place, these were put in for a reason and is still relevant.</p> <p>The noise and pollution this extra traffic will cause could be a health hazard for many as properties will be too close to the road.</p> <p>Also property prices will drop as no one will be interested living (or bringing children up) so close to such a polluted and dangerous road. Adjacent roads will become rat-runs as drivers will try to find alternative routes</p> <p>A Park and Ride will not be beneficial as the traffic delays will encourage users to use their cars with a more direct route into Bristol City Centre and clog up side roads by parking en-route.</p> <p>I truly believe the best option would be to use the A4 from Hicksgate make a new junction on Callington Road that is wide enough for the increase in traffic straight along to Hartcliffe Roundabout, joining the ring road up into Bristol City Centre.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Lynn Parsons
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
<p>I have lived in Whitchurch at various locations for more than 20 years, I currently live on the road that will be greatly impacted by these plans, Not just the road but the entire area of Whitchurch and its residents will be changed by the building of these houses on green belt land , this is directly beneath dundry and meas knoll which is an area of historical significance. If the houses proposed are built along with a further 3500 planned in Whitchurch, traffic pollution would be far greater and at present is very poor , not to mention the proposed ring road that will follow on condition the houses are built , through a residential area with 20 mph speed restrictions, weight limits of 7.5 tons and past a school , please think again and choose an area with the infrastructure to support so many homes and consider the health and well being of all Whitchurch residents . This will be the worse to ever happen to this community's health and welfare . There is no infrastructure that can support this , lastly I am also concerned greatly for the value of my property will be reduced greatly a property my family have invested all their earning into for 16 years, Please think again and consider the environment and community,</p> <p>Kind Regards</p> <p>Lynn Parsons</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Nicola Pearce
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
Any other comments
<b>Comment</b>
<p>Temple Cloud has already fulfilled 65% of its building quota and the building that has been completed has detrimentally affected the village. An increase on a scale that is planned will affect the current villagers and their quality of life.</p> <p>Most people who live here have chosen to live here because of the countryside and open spaces. Once the green field sites go, they will never be green again. The landscape in this area is beautiful and full of birds, deer, hares, foxes and badgers - something we see and appreciate every day. I do not want to live in a sprawling concrete housing estate. Housing should be built in small absorbable sites where the increase and pressure on amenities is minimal preferably in towns and cities on brown field sites - Midsomer Norton and Keynsham for example.</p> <p>The recent building in the village has been large and expensive housing which is way out of reach to many people. The proportion of lower cost housing - which is much needed by young people in this area, is far too low. The houses that have been built haven't sold as they are in such a high purchase bracket for this area. The housing was not approved by the Parish Council and reflected on the whole, the villagers opinions and any increase on this scale will be opposed again. BANES council cannot continue running roughshod over small villages who do not want expansion on this scale.</p> <p>The village school is at capacity and there doesn't seem to be any plan to expand the school, particularly in this site. The increase in population will adversely affect other public services such as our doctors surgery which is excellent at the moment. We do not have any other amenities in the village and those we will be put under huge pressure.</p> <p>One of my biggest concerns is the rise in pollution in the village which is already extremely poor. My youngest son has suffered from asthma and I believe this was in part due to living on the main road and suffering from the affects of pollution. Expansion of the village will increase traffic and pollution and this cannot happen. I understand that there is a study being run at the moment about pollution in the village and I think that the results of this should inform any decision to add to the increase of traffic.</p> <p>A serious consideration should be made to reduce traffic by improving the shoddy public transport we have here. Unless this is improved then traffic will increase. Please note that there is no direct public transport from Temple Cloud to Bath or to Keynsham.</p>



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Miss Amy Phillips
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
I live on Whitchurch lane and we are not happy with the extra amount of traffic that will be coming down the road we live on. We already have questions of traffic at busy periods of the day. Along our road are children and elderly people and a school at which you are suppose to be bring the new road out of. Has any not thought about all this because itâ€™s going to be a mess. Whitchurch lane has no parking for residents we share parking with visitiors and the local shops. Me and my family are very against the idear and i believe the whole area is to.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr John-Paul Philliskirk
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitechurch Strategic Development Location (SDL)WCH8 - Green Infrastructure
<b>Comment</b>
<p>Having recently moved to Bristol from Manchester and bought a new house on the new Barratt development of Whitechurch Court, I am strongly against the proposed plans for a new ring road. The proposed will come from stockwood over Queen Charlton Lane with a roadabout where the current play area is on the a37.</p> <p>My house is directly next to Queen Charlton Lane and of the proposed road goes ahead, all we will hear is constant traffic. Not only myself but there are many other residents that are moving in have not been told about these plans.</p> <p>We are all strongly against the plans, we bought for the countryside appeal, not to look or be next to a ring road!</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Jennifer Prowse
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS1 - Focussed approach avoiding the Green Belt
<b>Comment</b>
<p>I am writing regarding proposed housing on RAD25 and RAD 26 in the new Local Plan 2016-2036 currently under consultation.</p> <p>BANES Topic Paper: Developing an appropriate special strategy for non-strategic growth produced Winter 2018 defines Writhlington as a RA1 village and suggests for the period 2011-2029 that around 50 new dwellings in the village within HDB is acceptable.</p> <p>Writhlington village is over this quota as 55 houses have been built on the end of Knobsbury Lane, the Methodist Chapel has been changed into two dwellings and a new house has been built on Manor Road. Writhlington has fulfilled its commitment and there should be no further housing until 2029.</p> <p>Both these areas are outside the Housing Development Boundary. According to BANES Core Strategy &amp; 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 has not developed a Neighbour Plan as yet so no building outside the HDB can, or has been identified.</p> <p>In the Placemaking Plan 2017 BANES identified in the Somer Valley there is a “high level of existing housing commitments exacerbating the imbalance of housing over jobs”. “It is important that additional housing does not worsen the balance between homes and jobs and the out-commuting problem” There is minimal employment in Writhlington so new house holders would all have to out commute for work.</p> <p>Writhlington village infrastructure is limited and badly positioned. It has only a small village shop and very limited public transport. All residents are car dependent as they need to travel to both employment and amenities. As most employment is in Bath there would be a significant increase in traffic using Church Hill or Green Parlour Lane in order to avoid the standstill commuter traffic in Radstock town centre.</p> <p>Any new development here goes against BANES Spatial Vision of “reducing car use” and “maintaining a low carbon economy”.</p> <p>BANES Strategic Objectives include “ensure the location and layout of new development enables and encourages people to make the best use of public transport, walking and cycling” Public transport in Writhlington has been severely reduced and it would be dangerous to cycle on any of the access roads due to heavy traffic or narrow steep lanes with poor visibility. Walking is also difficult in view of the steep terrain, lack of pavements and distances involved.</p>

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**Representations received online:**

The Placemaking Plan states “there is no immediate prospect of large scale funding to trigger road infrastructure improvements within the plan period”.

Road infrastructure is already overloaded and dangerous and will not support any more housing development.

The Manor Road/ Knobsbury Lane/ Old Lane/ Frome Road junction is gridlocked at peak times with the huge amount of traffic accessing both the schools and the Sports Centre. It is extremely dangerous especially considering the large number of students walking to school. There are over 1500 students using this location. This junction cannot support any additional traffic without the use of traffic lights.

Access to both RAD25 and RAD26 would be along Old Lane, Green Parlour Lane, Church Hill or Manor Road. All these roads are effectively single track as Manor Road is narrowed to a single carriageway due to residents parking.

It has already been brought to the council’s attention the numerous accidents on Church Hill and Green Parlour Lane. They are both steep and narrow with high hedges and poor visibility leading to a narrow bridge and railway arch on a blind bend. Commuters to Bath use these roads to avoid the heavy congestion in Radstock town centre at peak times. Increasing the level of traffic without road and bridge widening should not be considered. Students who walk down Church Hill to access Peasedown St John already take their lives in their hands as there are no pavements and drivers who use this route as a rat run show them no consideration.

Clearly RAD26 and RAD25 are not suitable for development on the new Local Plan without significant upgrades of the current road and improved access.

The development appears to be at odds with BANES Green Infrastructure Strategy.

The sites are green fields when there are potential brown field sites within the Somer Valley area that should be prioritised. One field is agricultural while the other supports a chicken farm. BANES spatial vision states we should “grow more local food” Building on these sites will be counterproductive to this.

BANES identify the woodland below RAD26 as a site of Nature Conservation Importance. Building on the hill above will increase water run off potentially contaminating and damaging this protected woodland.

There is no drainage or mains sewer infrastructure in RAD26 and the slope of the land in both RAD25 and RAD26 would make achieving an effective drainage or sewage system extremely difficult.

Radstock’s sewage system is already over capacity with the increased amount of housing in Writhlington and Radstock it would not sustain another development and it would take massive groundworks affecting more green field sites to implement a new system.

Church Hill and Green Parlour Lane regularly turn into rivers with their land drains unable to cope and in the winter months icy conditions have caused cars to completely lose control. The water run off means the road surface is poor and damaged increasing the poor quality of these roads.

The Spatial Strategy also states that we need to “help conserve, enhance and restore the diversity and resilience of the District’s wildlife”.

We know there are slow worms, bats, hedgehogs and dormice in both these areas. Some of these are protected species and building must not be allowed near their habitat.

At both RAD 25 and RAD26 leisure facilities are very limited. BANES propose a new town park in Midsomer Norton as their major leisure investment for Somer Valley in the Local Plan. This park will not be accessible for young people in Writhlington without transport and so is no benefit to them.

BANES council wants to “ensure that linkages to greenspaces and sustainable routes are

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**Representations received online:**

prioritised. The greenspace in Somer Valley is the cycle track. Writhlington residents have access to this greenspace either down Church Hill or Green Parlour Lane which as previously discussed are already dangerous and without pavements. Increasing the traffic load on these roads will make access to the greenway even more hazardous.

Without providing local leisure facilities and activities, especially for young people without transport, BANES could be feeding into anti-social behaviour patterns.

**CONCLUSION**

Writhlington has already met its quota of new houses until 2029.

RAD25 and RAD26 are outside the Housing Development Boundary.

The road infrastructure is already overloaded and dangerous.

RAD25 and RAD26 are green field sites.

There is minimal employment in Writhlington so new houses means out commuting, and more traffic on the roads.

There is no drains or sewage infrastructure.

There are protected species habitats on both these sites.

Very poor public transport.

No social amenities for young or old people.

Housing needs to be provided where there is a good road, drainage and public sewer infrastructure, strong transport links and plenty of amenities both medical and social. This is not RAD25 and RAD26

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr John Quinlan
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 8 - Development Management policiesDM10 - Housing in Green Belt Villages
<b>Comment</b>
<p>The adopted policies should acknowledge that smaller rural villages DO constitute and are COMMUNITIES under the terms of the NPPF. My submission in more detailed form has been acknowledged by your reply and responses dated 30/12 2018.</p> <p>Rural issues are not fully addressed by current proposals and my recent submission attempts to explain this in more detail as a resident of the rural village of North Stoke for over 35 years.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Walter (Terry) Reakes
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
Any other comments
<b>Comment</b>
<p>Ref: Bath &amp; North East Somerset Council Local Plan, 2016-2036 Draft Housing &amp; Economic Land Availability Assessment</p> <p>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 &amp; 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.</p> <p>Please note following comments on the suitability of RAD25 &amp; RAD26 for development within the land availability assessment</p> <p>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.</p> <p>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</p> <p>Draft HELAA 2018 “ Bath &amp; 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.</p>

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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



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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 nos 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

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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 I argue in the light of the council's decision 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 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

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**Representations received online:**

siteâ€™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.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Reynolds Reynolds
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH8 - Green Infrastructure
<b>Comment</b>
<p>After attending the consultation tonight, it is apparent that there are hundreds of people that are outraged (not an exaggeration) by the overall plan of development in Whitchurch and the construction of 2500 homes. The immediate village and surrounding area is one of beauty and is a rare treat considering it's close proximity to Bristol city centre and yet it is the intention to destroy this and turn a charming village community into a town. A town without the infrastructure to handle the additional properties not to mention the fact that there is already a strain on the local area due to commuters traveling down the a37. For these reasons I am strongly against the proposals and the few hundred others at tonight's meeting would agree! I look forward to this proposal being thrown out because it clearly has not been designed with any thought to the local community!</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Margaret Roberts
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
<p>As a longterm resident of Whitchurch Lane, I have seen a gradual expansion in the volume of traffic. While I appreciate there needs to be some radical thinking of routing traffic and an increase in housing, the proposed plan to send a vast increase in traffic through Hicks Gate and on to the Whitchurch Lane by Washing Pound Lane will see Whitchurch Lane become deluged. Already there are times during the day that the road is congested and at others it can take a long time to cross the road. That is in addition to the increased noise and fumes and safety aspect.</p> <p>I have a sense of deja vu in that many years ago I lived on part of the North Circular Road in London and over the years the traffic grew to such an extent that it was decided to widen the road. To cross the road then was very difficult before the widening and we used to have to get across very quickly {almost run}.</p> <p>For a similar situation to exist on the whitchurch lane, there are many residents here who are unable to cross the road that quickly. This brings me back to the point that all the increase in traffic going past the St Augustine's church onto quite a narrow section of road could well become so congested and even a traffic black spot. If this roadway is allowed to happen then it might then be deemed to be necessary by the powers that be to widen some sections of the road with the inevitable upheaval that people will face.</p> <p>I appreciate that we need more housing but in a sustainable way and approached sympathetically so that the inevitable traffic that comes with new housing is not caught up in traffic problems of its own. In addition,It would seem that problems from say the Brislington junction are just being moved further out of Bristol to the Whitchurch area.</p> <p>I understand that people are being encouraged to use public transport or bicycle more but as I am sure you are aware there are various reasons why this will not be the majority of people's mode of transport and the car will always be their preferred option.</p> <p>Some years ago there was a plan to route the link between Hicks Gate to the A38 via the other side of Dundry. What are the reasons that this is not being considered at this present time. The cost of routing the new road through to Whitchurch Lane will cost a lot more than money in terms of the general health and wellbeing of the local population.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Miss Anne-Marie Rogers
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
<p>I am totally opposed to the orbital link between the Wells Road and Whitchurch Lane. There is an enormous amount of housing proposed at Hengrove Park already - around 1,600 homes are coming soon plus we now hear that Bristol City Council plans to sell part of the Bottleyard on Whitchurch Lane for housing, which will bring hundreds, possibly thousands more homes. Whitchurch Lane simply cannot handle the increase in traffic this new orbital road would bring. It is a local community with a school and dentist positioned on Whitchurch Lane. The area is 20mph for a reason. The road is too narrow, with housing fronting on to large sections of it. It would be unsafe to increase the speed limit, allow heavy goods vehicles to travel down it and it would bring far too much noise and air pollution for local residents. It would cut our community in half - this has happened to so many communities in Bristol we must learn the lesson and not do it again. Bamfield is planned to be a main route for traffic to get to the new development at Hengrove, and is already busy. If you bring more traffic down Whitchurch Lane it will inevitably run down Bamfield when there are hold ups. Please do not destroy our air and our safety by bringing this road into our neighbourhood.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Diana Rogers
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS1 - Focussed approach avoiding the Green Belt
<b>Comment</b>
<p>The new Local Plan 2016-2036 is proposing development of RAD26 and RAD25.</p> <p>I want this to be stopped and these areas removed from the plan.</p> <ol style="list-style-type: none"><li>1. These are greenbelt fields outside the housing development boundary.</li><li>2. Writhlington has already exceeded its quota for new houses in the last 18 months so there should be no further housing until 2029.</li><li>3. It would go against BANES green infrastructure policy.</li><li>4. The road infrastructure is already overloaded and dangerous.</li><li>5. A lot of children's and parent's lives are at risk every day at the A362 junction with Knobsbury Lane, Manor Road and Old Road.</li><li>6. Any building work is inappropriate because there is no likelihood of effective drainage or sewage systems.</li><li>7. The roads but mainly lanes, eg. Church Hill, Green Parlour, Braysdown Lane are too narrow and are not suitable for any more traffic. They are already heavily used as a rat run to Bath.</li></ol>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Ms Clare Rosier
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
Please sort out 'party houses' - they cause great distress to people living around them and the income they bring in does not get spread throughout the city - hen parties pay huge money to the owner, some money to a handful of restaurants who accept their trade (many have banned them), and a lot of money to Tesco's to deliver groceries since they all spend one night of the weekend 'eating in'.



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Alan Rosling
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH6 - Local Centres
<b>Comment</b>
Impossible to see how a new road can be built to put more traffic on Whitchurch Lane, vehicle numbers, & pollution, We need a park & ride on the A37, surely The cheapest option, this surely will be worth the effort, should have been built when first suggested some years ago. Improve the junction A37 with the Keynsham turning. Perhaps a mini roundabout, slowing the A37 traffic approaching Whitchurch Village,

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Jacqueline Rowland
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
<p>I would like to see several HMOs returned to the community. Many young families (or retired people who want to downsize) are being prevented from living in Oldfield Park because of the high number of student accommodations. The law needs to be changed to allow HMOs to be returned to the community. When an HMO is sold it should lose its licence. The new owner would have to apply for a new licence. The Council would then decide whether or not to grant it according to the needs of OP community. This is the only way to reinstate a healthy community in this part of the city, and by doing this the Council would recuperate much lost council Tax. The loss of Council Tax is actually standing at £6m. It is an absolute disgrace when we do not have even enough money to clean our streets.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Dr Gary Rowland
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
<p>I support measures to prevent the increase in the number of students living in areas such as Oldfield Park, and encourage the universities to find accommodation on their own sites. I would also propose:</p> <ol style="list-style-type: none"><li>1. Making the current use of a Student Liaison Officer more efficient in helping students become better citizen members of their adopted community. Volunteer community members could play a significant role in this.</li><li>2. When a house with an HMO licence is sold the licence should be lost and the new owner should have to reapply. That would give the Council flexibility in granting licences according to the needs of the community.</li><li>3. Landlords or agents should be charged a levy to compensate for the lack of Council Tax from student tenants. Rents should be capped to prevent the cost being passed on to the tenants.</li></ol>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Ian Rowles
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH8 - Green Infrastructure
<b>Comment</b>
I live on the new Barrett development off of queen Charlton Lane, I am strongly against the proposed ring road plans as I believe this will impact on the local area. I wasn't advised any of these details when purchasing the property, if I would of known about the ring road next to my house I would not of purchased here.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Martha Salvage
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
<p>After considering the options we would rather there wasn't a new road put in place however as the infrastructure will struggle to deal with the proposed 2500 house I would rather that out of the two options the grey option C would be the better due to the fact that it will run along an area which is already built up and run into a relatively major road without having too much of an impact on the School or surrounding rural settings.</p> <p>Option D would have a massive negative impact on what is currently unspoilt countryside and then run along the side of a very busy primary school which already gets congested at peaks times.</p> <p>I would also like to comment that now these options have been suggested some disgruntled individuals have suggested running a major route along the bottom of Dundry like previously proposed, this would have a devastating effect on long grown habitats of wildlife, cause major pollution and also destroy the Maes Knoll which has historic value let alone the huge monetary implications I hope that under no circumstance this idea gets resurrected.</p> <p>As previously mentioned I would rather these works did not proceed and instead houses were spread in smaller numbers amongst more locations but if it is to go ahead then Option C is the best way.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Matthew Salvage
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
<p>I have looked at the proposed plans and although I would rather no new roads went ahead i understand that if the proposed houses were to go ahead then you would have to allow for the increased number of vehicles that would be on the roads.</p> <p>After viewing the plans I feel that Option C (Washing Pound Lane) grey route is the better of the two, it cuts across less countryside and runs along areas that are already built up and into a proposed roundabout which would keep a steady flow of traffic on what is already a relatively major road.</p> <p>Option D (orange route) I totally object too, it would spoil the outlook and cause major pollution along an area which is currently very rural and would be nice to keep this intact, it is also proposed to run into Half Acre Lane to the back end of Bridge Farm school, this area already gets very congested and there has been no measure put in place for the vehicle to get onto Whitchurch Lane with ease.</p> <p>I would also like to comment that the previous shelved plans for the 'missing link' along the bottom of Dundry should stay that way, this area is totally unspoilt and should stay that way it would have a huge detrimental effect to the community if that was to become an option again.</p> <p>I am well aware that you have assessed all of the elements and stand by my comments.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr & Mrs Martha & Matthew Salvage
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH4 - Housing
<b>Comment</b>
<p>We would rather that the new houses were erected in smaller numbers across more areas.</p> <p>2500 seems excessive and is going to result in large areas of rural land being gobbled up and Whitchurch losing its 'village' feel, why not build on brown areas which are currently in disrepair, then you can add additional housing and improve the outlook of places that are going to wreck and ruin.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Martha Salvage
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH12 - Other comments on Chapter 6
<b>Comment</b>
<p>I think building houses and roads on green belt is very risky, if you open up part for some then it will snowball, the houses will become more and more and the countryside less and less, it's a slippery slope and in order to preserve the country feel that areas like Whitchurch have this should be avoided at all costs.</p> <p>I think new houses should be erected in smaller numbers instead of 'new towns' 2500 is an excessive number that Whitchurch cannot cope with.</p> <p>Redevelop brown areas it may be costly but it's beneficial you keep your countryside and redevelop areas that are currently lying in tatters.</p>



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Joe Scofield
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
<p>There's a lot of material to wade through and I apologise if I make these comments in the wrong place.</p> <p>I feel strongly that further student blocks should only be built on university campuses - and I agree with the option which states that further university expansion should be matched by provision of further accommodation on their own sites.</p> <p>This would be to protect land that should be available for housing, including much needed affordable housing and social housing.</p> <p>I would like to add that Bath City Football Club and their partner in development Greenacre Capital, should not be allowed to press ahead with plans to build student blocks at Twerton Park. This development would be bitterly resented by the surrounding community and take up space originally earmarked for housing.</p> <p>As I understand it, the football club aim to be developing the site around about Spring 2019 and the revised Local Plan - which will most likely contain new restraints on where student blocks can be built - would be implemented in the Autumn. A massive development that flies in the face of the revised Local Plan shouldn't get the go-ahead just because an application was put in a few months before the changes come in.</p> <p>The development of Twerton Park should thus be put on hold if legally possible, so that it will be subject to the revised Local Plan.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Peter Shaddick
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
<p>I am opposed to the proposed extension of the Orbital Road from the A37 to Whitchurch road for the following reasons:</p> <p>The proposal destroys the GREEN BELT.</p> <p>The proposal destroys the habitat of wildlife including : Bats, Badgers, Slow worms, Newts, Hares, deer and other wildlife and rare plants.</p> <p>The planned route will increase pollution, noise and damage existing water courses.</p> <p>The proposed route is through an established residential area.</p> <p>The proposed route is adjacent to a Primary School with the inherent dangers of increased traffic.</p> <p>The Whitchurch Lane is not suitable for an extension of the ring road. It will cause congestion, pollution and solve nothing and will create significant congestion.</p> <p>The many connecting side roads make this proposal unworkable.</p> <p>The proposal could cause flooding.</p> <p>The capacity of Whitchurch lane has not been considered and the supporting documents and transport studies are incomplete and incorrect. The number of vehicles using Washing Pound lane are fictitious.</p> <p>The benefits of the proposal have been exaggerated and the impact on existing residents not considered.</p> <p>Other alternatives have not been considered, explained or justified.</p> <p>The full proposal is unsustainable and the effect and benefits of building additional ring roads/orbital links is not proven.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Jill Shaw
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>	
CHAPTER 3 - Spatial Strategy including the rural areasSS4 - Allocations	Review of Rural Areas Site
<b>Comment</b>	
<p>Regarding RAD25 and RAD26 the road infrastructure is completely unsuitable for housing development. The two access sites have been identified as Old Lane and Manor Road. Old Lane is a single track lane with high hedgerows and no pavements. This would have to be substantially widened causing loss of the hedgerows which provide vital habitat for wildlife. Manor Road is effectively a single track road as residents park all along one side due to insufficient private parking, the road narrows to single track when it becomes Church Hill. Both Writhlington Secondary School and St Mary’s Primary are situated in this area, at school entry and exit times the roads are often gridlocked. The junction of Manor Road/ Knobsbury Lane/Frome Road/Old Lane is very hazardous at these times especially for students walking to either school. Although double yellow lines have now been placed at the top of Manor Road, these are ignored and on many mornings cars and a large lorry delivering to Jones Convenience store park there. This junction cannot support more traffic without the use of traffic lights.</p> <p>It has already been brought to the council’s attention the numerous accidents on Church Hill and Green Parlour Lane. These are both steep,narrow lanes with poor visibility leading to a narrow bridge and then archway on a blind bend. Increasing the level of traffic without road and bridge widening would be extremely dangerous.</p> <p>BANES is very keen to monitor and reduce air pollution, RAD25 and RAD26 have minimal public transport links. Any housing would be car dependent which goes against BANES policies of reducing private cars on the road. We have already had 55 new homes built on the end of Knobsbury Lane which has impacted on the roads I have already mentioned and there has been no improvement to our public transport.</p> <p>RAD26 is currently used for agricultural purposes and RAD25 supports a chicken farm, we should not be building on these or any other green field sites. If there is such a housing crisis consider disused mills, waste ground or brownfield sites.</p> <p>Environmentally there are slow worms, bats, hedgehogs and badgers that I have witnessed which need to be protected. I hope that tree preservation orders can be placed on all trees to maintain habitat for wildlife.</p> <p>Housing needs to be provided where there is a good road infrastructure, good transport links and plenty of amenities such as adequate doctors, dentists and social activities eg youth clubs. This is not RAD26 and RAD25.</p>	

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Jill Shaw
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 7 - Somer ValleySOM4 - Other comments on Chapter 7
<b>Comment</b>
<p>Option 1 and Option 2 propose building on green field sites in Writhlington. There is no suitable employment for all this extra housing in Writhlington and no transport links.</p> <p>In the Placemaking Plan 2017 BANES have identified several factors in the Somer Valley area:          High level of existing housing commitments exacerbating imbalance of housing over jobs          No access to community facilities          Maintaining village centres          Poor public transport          Road congestion</p> <p>The Plan looks at regeneration but realises that out of the 2000 jobs it hopes to create only 900 of these are likely in the next 20 years.</p> <p>It is important that additional housing does not significantly worsen the balance between homes and jobs and the out-commuting problems</p> <p>Sites RAD26 and RAD25 will do this.</p> <p>There is no immediate prospect of large scale funding to trigger road infrastructure improvements within the plan period</p> <p>The Access roads into RAD26 and RAD25 are narrow, poorly maintained and congested. There have been numerous accidents on Frome Road between Terry Hill crossroads and Writhlington school. The road infrastructure between Writhlington and Peasedown is not suitable for any increased traffic, a car turned over at the bottom of the hill just over a week ago! Apart from being highly congested there is a ongoing safety issue with the number of children walking to both Writhlington School, the Mendip Studio School and St Mary's Primary.</p> <p>Prioritize development on brownfield sites focussing on Radstock and Midsomer Norton centres</p> <p>RAD25 and RAD26 are both green field sites on the edge of a village community.</p> <p>Strengthen the green links by a cycling and walking link</p> <p>The access to this from Writhlington is down Church Hill or Green Parlour Lane both of which would be dangerous to use on foot or by bike with increased levels of traffic.</p> <p>Enable new homes to be built within the development boundary</p> <p>RAD25 and RAD26 are outside the development boundary</p> <p>Facilitate the town park in Midsomer Norton</p> <p>What leisure facilities will be provided for Writhlington? 55 new homes have just been built at the end of Knobsbury Lane, these were not sold to local people. Illegal drugs are on the increase in this area. Young people, especially teenagers, need leisure facilities to avoid hanging round street corners and being targeted by drug dealers.</p> <p>Why is there no progression with the regeneration of the Welton Bibby site that could provide the necessary housing within the town centre near to the park, shops and good transport links?</p>

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**Representations received online:**

Writhlington and Radstock have provided a large number of new homes in the last couple of years. Writhlington wants to remain a village community that it has been for 200 years. Although the A362 runs through Writhlington all other roads are unsuitable for heavy traffic as they are either narrow, twisting country lanes with high hedges and so poor visibility or narrowed by cars parking in residential areas. Houses need to be considered in other areas nearer to possible employment, better public transport links and amenities.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Craig Shaw
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS1 - Focussed approach avoiding the Green Belt
<b>Comment</b>
<p>I am writing regarding proposed housing on RAD25 and RAD 26 in the new Local Plan 2016-2036 currently under consultation.</p> <p>BANES Topic Paper: Developing an appropriate special strategy for non-strategic growth produced Winter 2018 defines Writhlington as a RA1 village and suggests for the period 2011-2029 that around 50 new dwellings in the village within HDB is acceptable.</p> <p>Writhlington village is over this quota over 60 houses have been built in this area in the last two years. Writhlington has fulfilled its commitment and there should be no further housing until 2029.</p> <p>Both these areas are outside the Housing Development Boundary. According to BANES Core Strategy &amp; 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 has not developed a Neighbour Plan as yet so no building outside the HDB can, or has been identified.</p> <p>In the Placemaking Plan 2017 BANES identified in the Somer Valley there is a “high level of existing housing commitments exacerbating the imbalance of housing over jobs”. It is important that additional housing does not worsen the balance between homes and jobs and the out-commuting problem. There is minimal employment in Writhlington so new house holders would all have to out commute for work.</p> <p>Writhlington village infrastructure is limited and badly positioned. It has only a small village shop and very limited public transport. All residents are car dependent as they need to travel to both employment and amenities. As most employment is in Bath there would be a significant increase in traffic using Church Hill or Green Parlour Lane in order to avoid the standstill commuter traffic in Radstock town centre.</p> <p>Any new development here goes against BANES Spatial Vision of “reducing car use” and “maintaining a low carbon economy”.</p> <p>BANES Strategic Objectives include “ensure the location and layout of new development enables and encourages people to make the best use of public transport, walking and cycling”. Public transport in Writhlington has been severely reduced and it would be dangerous to cycle on any of the access roads due to heavy traffic or narrow steep lanes with poor visibility. Walking is also difficult in view of the steep terrain, lack of pavements and distances involved.</p> <p>The Placemaking Plan states “there is no immediate prospect of large scale funding to trigger road infrastructure improvements within the plan period”.</p>

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**Representations received online:**

Road infrastructure is already overloaded and dangerous and will not support any more housing development.

The Manor Road/ Knobsbury Lane/ Old Lane/ Frome Road junction is gridlocked at peak times with the huge amount of traffic accessing both the schools and the Sports Centre. It is extremely dangerous especially considering the large number of students walking to school. There are over 1500 students using this location. This junction cannot support any additional traffic without the use of traffic lights.

Access to both RAD25 and RAD26 would be along Old Lane, Green Parlour Lane, Church Hill or Manor Road. All these roads are effectively single track as Manor Road is narrowed to a single carriageway due to residents parking.

It has already been brought to the council's attention the numerous accidents on Church Hill and Green Parlour Lane. They are both steep and narrow with high hedges and poor visibility leading to a narrow bridge and railway arch on a blind bend. Commuters to Bath use these roads to avoid the heavy congestion in Radstock town centre at peak times. Increasing the level of traffic without road and bridge widening should not be considered. Students who walk down Church Hill to access Peasedown St John already take their lives in their hands as there are no pavements and drivers who use this route as a rat run show them no consideration.

Clearly RAD26 and RAD25 are not suitable for development on the new Local Plan without significant upgrades of the current road and improved access.

The development appears to be at odds with BANES Green Infrastructure Strategy.

The sites are green fields when there are potential brown field sites within the Somer Valley area that should be prioritised. One field is agricultural while the other supports a chicken farm. BANES spatial vision states we should "grow more local food". Building on these sites will be counterproductive to this.

BANES identify the woodland below RAD26 as a site of Nature Conservation Importance. Building on the hill above will increase water run off potentially contaminating and damaging this protected woodland.

There is no drainage or mains sewer infrastructure in RAD26 and the slope of the land in both RAD25 and RAD26 would make achieving an effective drainage or sewage system extremely difficult. Radstock's sewage system is already over capacity with the increased amount of housing in Writhlington and Radstock it would not sustain another development and it would take massive groundworks affecting more green field sites to implement a new system.

Church Hill and Green Parlour Lane regularly turn into rivers with their land drains unable to cope and in the winter months icy conditions have caused cars to completely lose control. The water run off means the road surface is poor and damaged increasing the poor quality of these roads.

The Spatial Strategy also states that we need to "help conserve, enhance and restore the diversity and resilience of the District's wildlife".

We know there are slow worms, bats, hedgehogs and dormice in both these areas. Some of these are protected species and building must not be allowed near their habitat.

At both RAD 25 and RAD26 leisure facilities are very limited. BANES propose a new town park in Midsomer Norton as their major leisure investment for Somer Valley in the Local Plan. This park will not be accessible for young people in Writhlington without transport and so is no benefit to them. BANES council wants to "ensure that linkages to greenspaces and sustainable routes are prioritised. The greenspace in Somer Valley is the cycle track. Writhlington residents have access to this greenspace either down Church Hill or Green Parlour Lane which as previously discussed are



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**Representations received online:**

already dangerous and without pavements. Increasing the traffic load on these roads will make access to the greenway even more hazardous.  
Without providing local leisure facilities and activities, especially for young people without transport, BANES could be feeding into anti-social behaviour patterns.

**CONCLUSION**

- â€¢ Writhlington has already met its quota of new houses until 2029.
- â€¢ RAD25 and RAD26 are outside the Housing Development Boundary.
- â€¢ The road infrastructure is already overloaded and dangerous.
- â€¢ RAD25 and RAD26 are green field sites.
- â€¢ There is minimal employment in Writhlington so new houses means out commuting, and more traffic on the roads.
- â€¢ There is no drains or sewage infrastructure.
- â€¢ There are protected species habitats on both these sites.
- â€¢ Very poor public transport.
- â€¢ No social amenities for young or old people.

Housing needs to be provided where there is a good road, drainage and public sewer infrastructure, strong transport links and plenty of amenities both medical and social. This is not RAD25 and RAD26

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Jill Shaw
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>	
CHAPTER 3 - Spatial Strategy including the rural areasSS2 - the Green Belt	More dispersed approach avoiding
<b>Comment</b>	
<p>I am writing regarding proposed housing on RAD25 and RAD 26 in the new Local Plan 2016-2036 currently under consultation.</p> <p>BANES Topic Paper: Developing an appropriate special strategy for non-strategic growth produced Winter 2018 defines Writhlington as a RA1 village and suggests for the period 2011-2029 that around 50 new dwellings in the village within HDB is acceptable.</p> <p>Writhlington village is over this quota as 55 houses have been built on the end of Knobsbury Lane, the Methodist Chapel has been changed into two dwellings, there is a new house on Old Lane, 2 new houses next to the school on Knobsbury Lane, a garage conversion into a house at the bottom of Church Hill and a new house has been built on Manor Road These have all occurred since 2009. Writhlington has fulfilled its commitment and there should be no further housing until 2029.</p> <p>Both these areas are outside the Housing Development Boundary. According to BANES Core Strategy &amp; 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 has not developed a Neighbour Plan as yet so no building outside the HDB can, or has been identified.</p> <p>In the Placemaking Plan 2017 BANES identified in the Somer Valley there is a “high level of existing housing commitments exacerbating the imbalance of housing over jobs”. It is important that additional housing does not worsen the balance between homes and jobs and the out-commuting problem. There is minimal employment in Writhlington so new house holders would all have to out commute for work.</p> <p>Writhlington village infrastructure is limited and badly positioned. It has only a small village shop and very limited public transport. All residents are car dependent as they need to travel to both employment and amenities. As most employment is in Bath there would be a significant increase in traffic using Church Hill or Green Parlour Lane in order to avoid the standstill commuter traffic in Radstock town centre.</p> <p>Any new development here goes against BANES Spatial Vision of “reducing car use” and “maintaining a low carbon economy”.</p> <p>BANES Strategic Objectives include “ensure the location and layout of new development enables and encourages people to make the best use of public transport, walking and cycling”. Public transport in Writhlington has been severely reduced and it would be dangerous to cycle on any of the access roads due to heavy traffic or narrow steep lanes with poor visibility. Walking is also difficult in view of the steep terrain, lack of pavements and distances involved.</p>	

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**Representations received online:**

The Placemaking Plan states “there is no immediate prospect of large scale funding to trigger road infrastructure improvements within the plan period”.

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The Manor Road/ Knobsbury Lane/ Old Lane/ Frome Road junction is gridlocked at peak times with the huge amount of traffic accessing both the schools and the Sports Centre. It is extremely dangerous especially considering the large number of students walking to school. There are over 1500 students using this location. This junction cannot support any additional traffic without the use of traffic lights.

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It has already been brought to the council’s attention the numerous accidents on Church Hill and Green Parlour Lane. They are both steep and narrow with high hedges and poor visibility leading to a narrow bridge and railway arch on a blind bend. Commuters to Bath use these roads to avoid the heavy congestion in Radstock town centre at peak times. Increasing the level of traffic without road and bridge widening should not be considered. Students who walk down Church Hill to access Peasedown St John already take their lives in their hands as there are no pavements and drivers who use this route as a rat run show them no consideration.

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The development appears to be at odds with BANES Green Infrastructure Strategy.

The sites are green fields when there are potential brown field sites within the Somer Valley area that should be prioritised. One field is agricultural while the other supports a chicken farm. BANES spatial vision states we should “grow more local food” Building on these sites will be counterproductive to this.

BANES identify the woodland below RAD26 as a site of Nature Conservation Importance. Building on the hill above will increase water run off potentially contaminating and damaging this protected woodland.

There is no drainage or mains sewer infrastructure in RAD26 and the slope of the land in both RAD25 and RAD26 would make achieving an effective drainage or sewage system extremely difficult.

Radstock’s sewage system is already over capacity with the increased amount of housing in Writhlington and Radstock it would not sustain another development and it would take massive groundworks affecting more green field sites to implement a new system.

Church Hill and Green Parlour Lane regularly turn into rivers with their land drains unable to cope and in the winter months icy conditions have caused cars to completely lose control. The water run off means the road surface is poor and damaged increasing the poor quality of these roads.

The Spatial Strategy also states that we need to “help conserve, enhance and restore the diversity and resilience of the District’s wildlife”.

We know there are slow worms, bats, hedgehogs and dormice in both these areas. Some of these are protected species and building must not be allowed near their habitat.

At both RAD 25 and RAD26 leisure facilities are very limited. BANES propose a new town park in Midsomer Norton as their major leisure investment for Somer Valley in the Local Plan. This park will not be accessible for young people in Writhlington without transport and so is no benefit to them.

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**Representations received online:**

BANES council wants to ensure that linkages to greenspaces and sustainable routes are prioritised. The greenspace in Somer Valley is the cycle track. Writhlington residents have access to this greenspace either down Church Hill or Green Parlour Lane which as previously discussed are already dangerous and without pavements. Increasing the traffic load on these roads will make access to the greenway even more hazardous. Without providing local leisure facilities and activities, especially for young people without transport, BANES could be feeding into anti-social behaviour patterns.

**CONCLUSION**

- â€¢ Writhlington has already met its quota of new houses until 2029.
- â€¢ RAD25 and RAD26 are outside the Housing Development Boundary.
- â€¢ The road infrastructure is already overloaded and dangerous.
- â€¢ RAD25 and RAD26 are green field sites.
- â€¢ There is minimal employment in Writhlington so new houses means out commuting, and more traffic on the roads.
- â€¢ There is no drains or sewage infrastructure.
- â€¢ There are protected species habitats on both these sites.
- â€¢ Very poor public transport.
- â€¢ No social amenities for young or old people.

Housing needs to be provided where there is a good road, drainage and public sewer infrastructure, strong transport links and plenty of amenities both medical and social. This is not RAD25 and RAD26

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Jill Shaw
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>	
CHAPTER 3 - Spatial Strategy including the rural areasSS1 - Green Belt	Focussed approach avoiding the
<b>Comment</b>	
<p>Further to other comments I have made previously regarding RAD25 and RAD26 I refer to BANES Local Plan Inquiry Changes 2005 Policy HG.4 "HDBs have been defined so as to generally follow the limits of existing housing development. Through the use of HDBs the location of residential development in the rural areas, and the open countryside in particular, is strictly controlled. This accords with Government guidance and the JRSP in also seeking to focus most development within the urban areas."</p> <p>I cannot find a new or updated Policy HG.4, RAD25 and RAD26 are outside the HDB in a village location.Both sites are currently open countryside.</p> <p>Policy PCS7A on the Placemaking Plan "Development will only be permitted where adequate sewage treatment facilities are available". This is not the case for RAD25 and RAD26.</p> <p>Policy ST7 states, regarding any new development, "no introduction of traffic of excessive volume, size or weight onto an unsuitable road system.There should be suitable vehicular access and safe and convenient access to and within the site for pedestrians, cyclists and those with a mobility impairment." The road infrastructure at both these sites as I have previously discussed is unsuitable.</p>	

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Jill Shaw
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>	
CHAPTER 3 - Spatial Strategy including the rural areasSS2 - the Green Belt	More dispersed approach avoiding
<b>Comment</b>	
<p>Further to other comments I have made previously regarding RAD25 and RAD26 I refer to BANES Local Plan Inquiry Changes 2005 Policy HG.4 "HDBs have been defined so as to generally follow the limits of existing housing development. Through the use of HDBs the location of residential development in the rural areas, and the open countryside in particular, is strictly controlled. This accords with Government guidance and the JRSP in also seeking to focus most development within the urban areas."</p> <p>I cannot find a new or updated Policy HG.4, RAD25 and RAD26 are outside the HDB in a village location.Both sites are currently open countryside.</p> <p>Policy PCS7A on the Placemaking Plan "Development will only be permitted where adequate sewage treatment facilities are available". This is not the case for RAD25 and RAD26.</p> <p>Policy ST7 states, regarding any new development, "no introduction of traffic of excessive volume, size or weight onto an unsuitable road system.There should be suitable vehicular access and safe and convenient access to and within the site for pedestrians, cyclists and those with a mobility impairment." The road infrastructure at both these sites as I have previously discussed is unsuitable. I have sent these comments to both SS1 and SS2 as RAD25 and RAD26 are on both proposals.</p>	

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Ms Paula Shelley
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS2 - More dispersed approach avoiding the Green Belt
<b>Comment</b>
<p>It is very confusing and distressing for a lay person that so soon after the Placemaking Plan 2011-2029 for BATHNES was adopted (13 July 2017), a completely different Local Plan 2016-2036 is now proposed to replace it. It is very depressing indeed that Temple Cloud and Clutton are once again singled out and threatened with massively disproportionate housing development and residents are having to defend the rural character and landscape of the two villages.</p> <p>Temple Cloud has already just had a development of 70 houses forced upon it despite objections not only from residents but from the Bathnes planners themselves. This, together with other smaller scale developments in the village, takes the increase in housing supply to over 80 (Temple Inn, 9, Peterside 5, plus infill houses), when policy RA1. proposed ‘around 50 houses’ for each village, with persuasive arguments that this was the sustainable level of new housing for rural villages. The village of Temple Cloud has taken its share of housing pressures by at least an additional 60%.</p> <p>The Placemaking Plan states the following about the site, ‘Land adjacent to Temple Inn Lane (SR24)’ where 70 houses have been allowed following an appeal. ‘Development of this site should contribute towards local identity and should create ‘a sense of place’ within the development with visual linkages into the countryside. Any development must respect and, where possible, enhance local distinctiveness and the intrinsic qualities of the countryside. The development should have a range of dwellings and not be dominated by one scale or type of property or by the highway arrangement.’ Now that the houses have been built it is impossible to see how this high density modern development, with high walls around tiny gardens and most houses opening almost directly onto the street, with virtually no greenspace, meets any of these criteria. Basically, it could be an urban estate anywhere in the UK.</p> <p>The option for a further 200 homes to be built in Temple Cloud and Clutton would, if adopted, totally destroy the rural character of the villages forever. There are no brownfield sites in either village, and very few remaining infill sites, so any housing would have to be built on the surrounding countryside, outside the existing (and recently expanded by appeal) housing development boundary. Not only would this destroy productive farmland but it would also impact negatively on the landscape setting of the villages and views from the surrounding countryside.</p> <p>The services in the villages are nowhere near sufficient to support further population growth, and so additional buildings would be required to provide these, particularly in the primary schools and doctors’ surgery. There are virtually no public transport links from Temple Cloud to nearby services such as those in Midsomer Norton. A decision was made to end the bus service running to Midsomer Norton and on to Bath due to the excessive journey time leading to timetabling problems. There is only one regular bus service passing though the villages, running between Bristol and Wells, and a once a day service to and from Clutton to Midsomer Norton. If local services are not expanded the only access to them will be by car. This cannot be defined as sustainable development by any</p>

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**Representations received online:**

measure.

It makes no sense to effectively create an entirely new community this distance from any employment location, major or minor, by adding 200 houses and effectively doubling the size of the population. No local housing demand has been demonstrated and new housing simply serves to provide premium housing for commuters, the vast majority of whom use private vehicles to get to areas of employment. This puts further pressure on the already overloaded A37 and contributes to poorer air quality and increased CO2 emissions.

I suggest that you look again at the options and build the housing where it is needed, accessible and sustainable, not just where it easiest because the land is outside of greenbelt protection.



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	mrs gillian shire
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
<p>The proposal to link Whitchurch Lane to the Orbital from Hicks Gate is not viable as far as additional traffic, pollution, noise, and air quality for those of us whom live on Whitchurch Lane. According to transport reviews there will be NO MORE TRAFFIC AND POLLUTION when this is linked to Whitchurch Lane.</p> <p>IF NOTHING CHANGES WHY BUILD THE LINK FROM OUTSIDE WHITCHURCH VILLAGE TO WHITCHURCH LANE????</p> <p>There is a serious risk to the value of houses on Whitchurch Lane and an adverse effect on the health of residents from noise and air pollution. WHAT IS PROPOSED TO DEAL WITH THIS????? MOST OF US ALREADY HAVE DOUBLE GLAZING, DUE TO NOISE, HOW ARE WE TO KEEP OUT EVEN MORE???</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Graham Sims
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH1 - Strategic Planning Framework
<b>Comment</b>
<p>I wish to object to the link road proposals and the proposed 2000 homes development and in particular the road linking the A37 to Whitchurch lane.</p> <p>The 2000 homes are on green belt which must be preserved. The link road is not therefore required. I support a new park &amp; ride facility on the outskirts of Whitchurch village.</p> <p>The proposed road linking the A37 to Whitchurch lane is fatal flawed. Whitchurch Lane is already heavily congested and your own figures show that this proposal will bring even more traffic onto a road that has weight restrictions,a 20mph zone and traffic calming measures. The two proposed access points are both problematic - at Maggs Lane the junction would be on a significant bend in Whitchurch Lane. At Half Acre it adjoins the local school and pedestrian crossing. This will simply bring more traffic and pollution into this locality and do little or nothing for easing congestion in Whitchurch Village</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Martyn Smith
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 5 - Keynsham and North Keynsham Strategic Development Location (SDL)KSM4 - Link Road alignment
<b>Comment</b>
Keynsham desperately needs measures to alleviate the gridlock on its roads especially from those vehicles that are just passing through. Any link Road from the A4175 and the A4 that can take that traffic away from Keynsham is needed.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Martyn Smith
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
Keynsham desperately needs measures to alleviate the gridlock on its roads especially from those vehicles that are passing through Keynsham to get to south Bristol from the A4 just to avoid the gridlock in Brislington. The link Road from the A4 to the A37 to complete the Bristol Ring Road as outlined in JSP 7.2 is essential to stop the rat run through Keynsham.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Philip Smith
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
I believe all of the options are fundamentally flawed as this will all flow into Whitchurch lane causing absolute traffic chaos on an already choked road. Half Acre Lane is already full with parents parking for the school entrance and the number of unreported accidents with people hitting the school bollards is on the rise. The Half Acre Lane Bridge Farm School entrance has eased some of the congestion on East Dundry Road which would reappear if the Half Acre Lane proposal was implemented, increasing the danger to school children crossing roads.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Debbie Soni
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH1 - Strategic Planning Framework
<b>Comment</b>
<p>I strongly object to the proposals and wish my objections to be registered. I am a BCC resident and the intrusion on Whitchurch green belt with an infrastructure that that is unsustainable is not viable. The proposal of so many houses and to build a orbital highway across green belt where much wildlife exists, and to run slap bang through the middle of a housing estate is ludicrous. Whichurch lane that also runs along side a large primary school already struggles with the amount of traffic it feeds, had slowing humps and weight restrictions and a surface that would not accomadate evens small increase in traffic (the surface had been repaired 3 times in the last 4years andi s complete mess again)! The pollution and danger to health and young children is really quite distressing for residents in the area. The area is also prone to flooding where the road will road . There are no plans for additional services which are already at their limits,, no plans for a secondary school meaning people will again get in there cars causing even more pollution and congestion. This proposal will have a negative impact on most of the residents in the area and will undoubtedly affect there well being and lives significantly Please keep me updated.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Paul Soni
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
<p>The plan to divert the ring road into Whitchurch village through either option advised on is totally inappropriate and this action is a totally irresponsible consideration. The roads will take more traffic into an already congested traffic scheme. The ground work to achieve one of the options will inhibit a school and in my opinion put children's life's at risk. A totally disgraceful consideration, local housing will be affected and residents properties will be devalued by this awful proposal. In the interests of safety, traffic congestion, the living conditions of Whitchurch residents and the environment the Whitchurch ring road proposal should be withdrawn immediately and consent not given.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Jonathan Spencer
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH1 - Strategic Planning Framework
<b>Comment</b>
<p>I am writing with many of my residents of Whitchurch village in order object to the proposed expansion plans surrounding the BANES/South Bristol and A37. Bath and North East Somerset appear to be planning an even larger development of housing than that which previously failed alongside the A37. 2500 additional homes in an area where traffic and congestion are already at an all-time high.</p> <p>This area is not a suitable and sustainable location for development. The infrastructure in roads, public transport, schools and amenities does not exist, and Whitchurch Village already has a shortage of these facilities. Adding them with a huge development, along with a massive increase to the population using the already unsuitable road infrastructure will irreversibly damage our village.</p> <p>Moreover, these plans have 2500 homes along with some schools and amenities being built on green field land, set to destroy our green spaces along the A37. Whitchurch Village has already been the site of two new developments in recent years. We are still in the process of having 250 new homes being built on the Horseworld site, which is causing significant disruption in the area. At least these previous developments were sustainably added to the village. This planned expansion would completely dwarf our village, which presently stands at less than 1000 residences.</p> <p>We do not wish to become another suburb of Bristol. Whitchurch Village has a proud tradition and heritage, and we would very much like to retain that traditional sense and value. Being part of an urban sprawl to the south was never part of our identity, and it never should be. The irreversible loss of green belt land this would cause should be reason enough alone to stop this project. Lining the pockets of developers is never going to help the housing crisis in this country. The homes being built are not "affordable" and they do not have a net positive impact on demand, because there is only one reason they want to build them; because they can sell them at \$400k per household. First time buyers and young people need sustainable and affordable developments where there is already infrastructure to sustain them. Adding to the woes of south Bristol and creating even more commuter misery is not a solution, especially when very few of these homes will end up in the hands of people who are most affected by the housing bubble.</p> <p>We must force developers to use the brownfield sites they already own and release similar sites from government hands for them to build on. They will make less money, but will have an impact without destroying wildlife, green spaces and without putting significant burdens on areas like ours.</p> <p>Destroying the natural beauty of our country to satisfy housing demands is an unsustainable practise. It is also not an effective strategy. Developers are simply exploiting the housing crisis to increase</p>



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**Representations received online:**

profits rather than helping to address the issue.

Many Thanks for taking the time to read this correspondence.

Jonathan Spencer

3 Hamilton Way  
Whitchurch  
BS14 0SZ

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Miss Bev Stephens
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)
<b>Comment</b>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Miss Bev Stephens
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH1 - Strategic Planning Framework
<b>Comment</b>
<p>B&amp;NES Local Plan 2016 - 2036 Options consultation (November 2018)</p> <p>Your proposal to build 2,500 houses on precious Green Belt land in Whitchurch is unsound, paragraph 14 in the National Planning Policy Framework evidently declares that housing targets should not override constraints within the area. The constraints at Whitchurch Village are the Green Belt and Flooding. The Whitchurch Village Neighbourhood Plan has been adopted by B&amp;NES and the residents (98%) voted both for the retention of the Green Belt and the Plan. The Green Belt should not be revisited for alteration within the current Core Strategy documents.</p> <p>If built, these 2,500 new houses, in addition to those being developed at The Bridles and White Church Court and the many along Charlton Road, will eat up 100s of acres of Green Belt and create urban sprawl that will practically join Keynsham to Bristol, on land that is highly prone to flooding.</p> <p>The residents of these new homes will want to travel into Bristol to work from an area that already suffers from substantial commuter congestion and your transport proposal will do nothing to help alleviate this.</p> <p>Whilst I agree that a Park and Ride is long overdue on the Wells Road, the regularity of the proposed service is woefully inadequate, particularly at commuter times and that is one of the least sustainable locations you could™ve picked.</p> <p>The projected link road from Hicksgate to Whitchurch will bring heavy traffic onto already clogged roads, making the situation on Pensford Hill, where the road is often shut due to lorries being unable to pass each other, perilous.</p> <p>Highways Officers have publicly stated that their plans will not improve or alleviate the traffic situation, so why is public money being wasted so frivolously?</p> <p>Both of the options for the mini bypass joining A37 to Whitchurch Lane are ludicrous. The aim of this new link road is to reduce car traffic on the A37 but instead puts additional vehicles onto residential roads. It will cost £21 - £29 million simply to move the traffic problem from one area to another. The Halfacre Lane option runs alongside Bridge Farm Primary School raising local concern regarding the air quality for the children and the mental health and wellbeing of the residents. Whitchurch Lane has a 20 mile an hour speed limit with traffic calming measures, put there by Bristol City Council for a very good reason. How can it be acceptable for it to suddenly be turned into an "Orbital Highway" ?</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

Bristol City Council is proposing to build c2,000 new homes on Hengrove Park which will also have an adverse impact on the traffic using Whitchurch Lane which will become a car park for much of the day. Bristol Council and B&NES must join up the thinking on this issue.

Tim Kent (Bristol City Councillor for Hengrove & Whitchurch Park), Paul May (B&NES Councillor for Publow & Whitchurch) and Karin Smith (MP for South Bristol) all oppose the 2,500 homes in Whitchurch and the A37/Whitchurch Lane mini bypass roads, they and many residents of Whitchurch Village and Whitchurch Park urge you to rethink your unsustainable proposals.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Sylvia Stephens
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH2 - Whitchurch SDL Garden City Principles
<b>Comment</b>
<p>I am writing to state my opposition to the proposal to build 2,500 in Whitchurch. This is precious Green Belt land and must not be built on. The CPRE and the residents believe that the Green Belt should only be built on as last resort. Brownfield land should be used before thinking of going onto the Green Belt or green field sites, B&amp;NES and Bristol still have capacity to build thousands of homes on brownfield sites.</p> <p>The NPPF clearly says that housing targets should not override constraints within the area. The constraints in this area being Green Belt and Flooding. Our own Neighbourhood Plan was voted for the retention of the Green Belt and is it should not be revisited for alteration within the current Core Strategy documents.</p> <p>Government policy is clear that the geographical extent of Green Belts, can only be changed in exceptional circumstances (NPPF para 83). Ministers have also made clear "that demand for housing alone will not change Green Belt boundaries.</p> <p>If we loosen Green Belt controls we simply allow more land to be built on where developers can make maximum profit. The Green Belt is important in checking the urban sprawl of Bristol, which with these plans and the various Charlton Lane developments is in danger of merging with Keynsham!!</p> <p>You have given the housing developers too much control of where they build, they have cherry picked the most profitable sites and inflated the number of houses required, with scant regard for local landscapes, the environment and the needs of the local community.</p> <p>This is a rural community and as such is ill served by public transport, additional homes will only lead to an increase in the use of commuting by car adding to the pressure on already congested roads.</p> <p>The P&amp;R is too small, the number of buses per hour is too little, it is unlikely to have any impact on traffic flow along the A37 whilst not being financially viable. In fact, I find it difficult to understand who it is supposed to serve.</p> <p>Turning to the options for the "Orbital Highway" linking the A37 to Whitchurch Lane, this is a ludicrous idea, it simply will not work. Whitchurch Lane has been designated as 20mph with speed bumps for goods reasons. The road is already regularly congested.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

One option for this new road runs directly by Bridge Farm Primary School; residents, staff and parents are all concerned about the air quality, safety and mental wellbeing of the children and locals.

Your own research has shown that journey times on Whitchurch Lane will be increased, with c80% more traffic including HGVs using the route. Whilst journey times into Bristol on the A37 will not improve by any significant amount (the time saved being counted in seconds rather than minutes!). This will solve nothing, you are simply moving the congestion from the A37 on to a residential road. How can this be an efficient use of tax payer's money? Your transport strategy must be rethought, I oppose it in the strongest terms.

Sylvia

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	mrs zoe stone
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 8 - Development Management policiesDM11 - Industrial land
<b>Comment</b>
re Wansdyke business centre - I would like to see this retained for industrial units use as the policy highlights the increased demand for industrial land. I think the parking cannot accommodate further housing/higher density. It was also a well used site with a good gym, bicycle repair etc. There are many local businesses that could benefit.

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Denis Stuckey
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 5 - Keynsham and North Keynsham Strategic Development Location (SDL)KSM11 - Other comments on Chapter 5
<b>Comment</b>
<p>The huge number of proposed houses for the Queen Charlton area, stretching right to the A4 is absolutely ridiculous, and will remove the Green Belt between Bristol and Keynsham. Surely it is in all interests to keep a green barrier between Bristol and Keynsham? There are already plans for thousands of houses to be built in Whitchurch (Bristol City Council). If Keynsham is also expanded by some extra 1,600 houses in this same area the result will be totally objectionable. It will certainly fail miserably to meet your stated objective of, quote, "...this is to be undertaken in a way which also protects and enhances the areas significant environmental qualities" unquote. Complete failure on your part. Where do you think that most of the proposed householders will travel? It will be on to the A4 Wells Road. The congestion will be absolutely diabolical. Don't explain it away by assuming that all of these new residents will all ride bikes or walk - it will not happen. (We know that Bristol's mayor follows this theory, and like most things he does, he is wrong about this too). Your proposed extension of the Ring Road to link up to Ridgeway Lane/Whitchurch Lane is also complete nonsense. Whitchurch Lane is already running at capacity during the peak times. Large parts of Whitchurch Lane are single carriageway, and pass very close to existing houses. Any additional traffic will be completely unacceptable. Traffic fumes and the vehicles will also present serious problems to the children attending the local school which Whitchurch Lane passes next to. Why have you deliberately avoided mentioning what the anticipated traffic increase will be? You must have figures available. The extension to the Ring Road should follow the originally planned route to the South of Whitchurch Village and below the Dundry Ridge to link up to the Hartcliffe roundabout, with the existing dual carriageway linking it to the new road to the Weston - Super - Mare road.</p>



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs michelle Taylor
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>	
CHAPTER 3 - Spatial Strategy including the rural areasSS1 - Green Belt	Focussed approach avoiding the
<b>Comment</b>	
<p>I am strongly opposed to the proposed housing development on RAD25 &amp; RAD26 in the new local plan 2016-2026. BANES Topic Paper: Developing an appropriate special strategy for non-strategic growth produced Winter 2018 defines Writhlington as a RA1 village and suggests for the period 2011-2029 that around 50 new dwellings in the village within HDB is acceptable.</p> <p>Writhlington village is over this quota as 55 houses have been built on the end of Knobsbury Lane, the Methodist Chapel has been changed into two dwellings and a new house has been built on Manor Road. Writhlington has fulfilled its commitment and there should be no further housing until 2029. Both these areas are outside the Housing Development Boundary. According to BANES Core Strategy &amp; 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 has not developed a Neighbour Plan as yet so no building outside the HDB can, or has been identified. In the Placemaking Plan 2017 BANES identified in the Somer Valley there is a</p> <p>"high level of existing housing commitments exacerbating the imbalance of housing over jobs".</p> <p>"It is important that additional housing does not worsen the balance between homes and jobs and the out-commuting problem". There is minimal employment in Writhlington so new house holders would all have to out commute for work.</p> <p>Writhlington village infrastructure is limited and badly positioned. It has only a small village shop and very limited public transport. All residents are car dependent as they need to travel to both employment and amenities. As most employment is in Bath there would be a significant increase in traffic using Church Hill or Green Parlour Lane in order to avoid the standstill commuter traffic in Radstock town centre.</p> <p>Any new development here goes against BANES Spatial Vision of "reducing car use" and "maintaining a low carbon economy".</p> <p>BANES Strategic Objectives include "ensure the location and layout of new development enables and encourages people to make the best use of public transport, walking and cycling". Public transport in Writhlington has been severely reduced and it would be dangerous to cycle on any of the access roads due to heavy traffic or narrow steep lanes with poor visibility. Walking is also difficult in view of the steep terrain, lack of pavements and distances involved.</p> <p>The Placemaking Plan states "there is no immediate prospect of large scale funding to trigger road infrastructure improvements within the plan period".</p> <p>Road infrastructure is already overloaded and dangerous and will not support any more housing development.</p>	

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

The Manor Road/ Knobsbury Lane/ Old Lane/ Frome Road junction is gridlocked at peak times with the huge amount of traffic accessing both the schools and the Sports Centre. It is extremely dangerous especially considering the large number of students walking to school. There are over 1500 students using this location. This junction cannot support any additional traffic without the use of traffic lights.

Access to both RAD25 and RAD26 would be along Old Lane, Green Parlour Lane, Church Hill or Manor Road. All these roads are effectively single track as Manor Road is narrowed to a single carriageway due to residents parking.

It has already been brought to the council's attention the numerous accidents on Church Hill and Green Parlour Lane. They are both steep and narrow with high hedges and poor visibility leading to a narrow bridge and railway arch on a blind bend. Commuters to Bath use these roads to avoid the heavy congestion in Radstock town centre at peak times. Increasing the level of traffic without road and bridge widening should not be considered. Students who walk down Church Hill to access Peasedown St John already take their lives in their hands as there are no pavements and drivers who use this route as a rat run show them no consideration.

Clearly RAD26 and RAD25 are not suitable for development on the new Local Plan without significant upgrades of the current road and improved access.

The development appears to be at odds with BANES Green Infrastructure Strategy.

The sites are green fields when there are potential brown field sites within the Somer Valley area that should be prioritised. One field is agricultural while the other supports a chicken farm. BANES spatial vision states we should "grow more local food". Building on these sites will be counterproductive to this.

BANES identify the woodland below RAD26 as a site of Nature Conservation Importance. Building on the hill above will increase water run off potentially contaminating and damaging this protected woodland.

There is no drainage or mains sewer infrastructure in RAD26 and the slope of the land in both RAD25 and RAD26 would make achieving an effective drainage or sewage system extremely difficult. Radstock's sewage system is already over capacity with the increased amount of housing in Writhlington and Radstock it would not sustain another development and it would take massive groundworks affecting more green field sites to implement a new system.

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There are protected species habitats on both these sites.

Very poor public transport.

No social amenities for young or old people.

Housing needs to be provided where there is a good road, drainage and public sewer infrastructure, strong transport links and plenty of amenities both medical and social. This is not RAD25 and RAD26

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**Representations received online:**

**Respondent**

<b>Name</b>	Mr Alan Taylor
<b>Agent (if applicable)</b>	

**Comment**

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**Respondent**

<b>Name</b>	Mrs michelle Taylor
<b>Agent (if applicable)</b>	

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**Respondent**

<b>Name</b>	Mrs michelle Taylor
<b>Agent (if applicable)</b>	

**Comment**

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**Respondent**

<b>Name</b>	MRS MICHELLE Taylor
<b>Agent (if applicable)</b>	

**Comment**

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**Respondent**

<b>Name</b>	MR ALAN TAYLOR
<b>Agent (if applicable)</b>	

**Comment**

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CHAPTER 3 - Spatial Strategy including the rural areasSS1 - Focussed approach avoiding the Green Belt
<b>Comment</b>
<p>I am writing regarding proposed housing on RAD25 and RAD 26 in the new Local Plan 2016-2036 currently under consultation.</p> <p>BANES Topic Paper: Developing an appropriate special strategy for non-strategic growth produced Winter 2018 defines Writhlington as a RA1 village and suggests for the period 2011-2029 that around 50 new dwellings in the village within HDB is acceptable.</p> <p>Writhlington village is over this quota as 55 houses have been built on the end of Knobsbury Lane, the Methodist Chapel has been changed into two dwellings and a new house has been built on Manor Road. Writhlington has fulfilled its commitment and there should be no further housing until 2029.</p> <p>Both these areas are outside the Housing Development Boundary. According to BANES Core Strategy &amp; 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 has not developed a Neighbour Plan as yet so no building outside the HDB can, or has been identified.</p> <p>In the Placemaking Plan 2017 BANES identified in the Somer Valley there is a “high level of existing housing commitments exacerbating the imbalance of housing over jobs”. “It is important that additional housing does not worsen the balance between homes and jobs and the out-commuting problem” There is minimal employment in Writhlington so new house holders would all have to out commute for work.</p> <p>Writhlington village infrastructure is limited and badly positioned. It has only a small village shop and very limited public transport. All residents are car dependent as they need to travel to both employment and amenities. As most employment is in Bath there would be a significant increase in traffic using Church Hill or Green Parlour Lane in order to avoid the standstill commuter traffic in Radstock town centre.</p> <p>Any new development here goes against BANES Spatial Vision of “reducing car use” and “maintaining a low carbon economy”.</p> <p>BANES Strategic Objectives include “ensure the location and layout of new development enables and encourages people to make the best use of public transport, walking and cycling” Public transport in Writhlington has been severely reduced and it would be dangerous to cycle on any of the access roads due to heavy traffic or narrow steep lanes with poor visibility. Walking is also difficult in view of the steep terrain, lack of pavements and distances involved.</p>



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**Representations received online:**

The Placemaking Plan states “there is no immediate prospect of large scale funding to trigger road infrastructure improvements within the plan period”.

Road infrastructure is already overloaded and dangerous and will not support any more housing development.

The Manor Road/ Knobsbury Lane/ Old Lane/ Frome Road junction is gridlocked at peak times with the huge amount of traffic accessing both the schools and the Sports Centre. It is extremely dangerous especially considering the large number of students walking to school. There are over 1500 students using this location. This junction cannot support any additional traffic without the use of traffic lights.

Access to both RAD25 and RAD26 would be along Old Lane, Green Parlour Lane, Church Hill or Manor Road. All these roads are effectively single track as Manor Road is narrowed to a single carriageway due to residents parking.

It has already been brought to the council’s attention the numerous accidents on Church Hill and Green Parlour Lane. They are both steep and narrow with high hedges and poor visibility leading to a narrow bridge and railway arch on a blind bend. Commuters to Bath use these roads to avoid the heavy congestion in Radstock town centre at peak times. Increasing the level of traffic without road and bridge widening should not be considered. Students who walk down Church Hill to access Peasedown St John already take their lives in their hands as there are no pavements and drivers who use this route as a rat run show them no consideration.

Clearly RAD26 and RAD25 are not suitable for development on the new Local Plan without significant upgrades of the current road and improved access.

The development appears to be at odds with BANES Green Infrastructure Strategy.

The sites are green fields when there are potential brown field sites within the Somer Valley area that should be prioritised. One field is agricultural while the other supports a chicken farm. BANES spatial vision states we should “grow more local food” Building on these sites will be counterproductive to this.

BANES identify the woodland below RAD26 as a site of Nature Conservation Importance. Building on the hill above will increase water run off potentially contaminating and damaging this protected woodland.

There is no drainage or mains sewer infrastructure in RAD26 and the slope of the land in both RAD25 and RAD26 would make achieving an effective drainage or sewage system extremely difficult.

Radstock’s sewage system is already over capacity with the increased amount of housing in Writhlington and Radstock it would not sustain another development and it would take massive groundworks affecting more green field sites to implement a new system.

Church Hill and Green Parlour Lane regularly turn into rivers with their land drains unable to cope and in the winter months icy conditions have caused cars to completely lose control. The water run off means the road surface is poor and damaged increasing the poor quality of these roads.

The Spatial Strategy also states that we need to “help conserve, enhance and restore the diversity and resilience of the District’s wildlife”.

We know there are slow worms, bats, hedgehogs and dormice in both these areas. Some of these are protected species and building must not be allowed near their habitat.

At both RAD 25 and RAD26 leisure facilities are very limited. BANES propose a new town park in Midsomer Norton as their major leisure investment for Somer Valley in the Local Plan. This park will not be accessible for young people in Writhlington without transport and so is no benefit to them.

BANES council wants to “ensure that linkages to greenspaces and sustainable routes are

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

prioritised. The greenspace in Somer Valley is the cycle track. Writhlington residents have access to this greenspace either down Church Hill or Green Parlour Lane which as previously discussed are already dangerous and without pavements. Increasing the traffic load on these roads will make access to the greenway even more hazardous.

Without providing local leisure facilities and activities, especially for young people without transport, BANES could be feeding into anti-social behaviour patterns.

**CONCLUSION**

â€¢ Writhlington has already met its quota of new houses until 2029.

â€¢ RAD25 and RAD26 are outside the Housing Development Boundary.

â€¢ The road infrastructure is already overloaded and dangerous.

â€¢ RAD25 and RAD26 are green field sites.

â€¢ There is minimal employment in Writhlington so new houses means out commuting, and more traffic on the roads.

â€¢ There is no drains or sewage infrastructure.

â€¢ There are protected species habitats on both these sites.

â€¢ Very poor public transport.

â€¢ No social amenities for young or old people.

Housing needs to be provided where there is a good road, drainage and public sewer infrastructure, strong transport links and plenty of amenities both medical and social. This is not RAD25 and RAD26

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Daniel Thatcher
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH12 - Other comments on Chapter 6
<b>Comment</b>
I object to the develop of thousands of houses in this area, the local infrastructure will not support such a development and nothing I have read convinces me that there is any want from the council etc to provide the correct infrastructure. Heavy on words like 'sustainable development' and green spaces and woodlands. No development is sustainable, every development on green belt is destructive. No high street proposed and a weak notion that health care cannot be planned for but school places can? The report highlights the want to build thousands of houses with total disregard for the local area. Not sure what jobs are included as there is no detail on the creation of those jobs, aside from the two schools and community centre. No high street so all residents will require a car etc to travel to Whitchurch or Keynsham.

**Attachments Included**

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Miss Hannah Theyers
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
<p>Good evening,</p> <p>Having only recently moved to the Barratts "White Church Court" development I am very saddened to hear that there is a proposed ring road just meters from my front door. Alongside all the other residents of Whitchurch Village, we chose to live here because of the beautiful surroundings filled with wildlife. The proposed ringroad will destroy an area in which many wildlife live. Whitchurch Village will turn into an extension and suburb of Bristol, something that residents are in opposition of. I chose to live in this location aware of the current traffic situation; despite having to travel everyday up the m5. If travel were to be an issue for any of the residents, we would not have chosen to live here, so why change what is already there?</p> <p>I hope that this proposal is seriously reconsidered and that local communities and wildlife are made a priority; something that sadly does not appear to be the case.</p> <p>Yours sincerely, Hannah Theyers</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Debbie Trotman
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
Any other comments
<b>Comment</b>
<p>As a resident of Whitchurch I am writing to voice my horror and absolute objection at the proposed development of Whitchurch into a car park (proposed park and ride to replace the current p&amp;r on Bath Road - aim alleviate traffic in one area and transfer the problem to an already highly congested A37.</p> <p>The creation of an orbital link road cutting through the heart of the suburb of Bristol,skirting around the edge of a 3 form entry Primary School and directing an increased volume of traffic past its gates, a long a narrow, currently 20 mile an hour residential road and changing the face of this quiet community forever! The health implications, congestion, impact on the residential area which will invariably create new rat runs as drivers look to cut through other parts of the area rather than follow the 'planned' route.</p> <p>Your report clearly acknowledges the need for less use of cars and yet your plan is all about the creation of more roads!</p> <p>In addition the proposed urban developments will only be creating more traffic.</p> <p>Squeezing this through the bottle neck of an already established community is reckless and as a resident of Bristol I feel that this planning is based upon cost and with no consideration for the impact on our small community.</p> <p>In addition to traffic generated by a park and ride, new urban communities, an orbital link road the area will also be linked to Keynsham, via Stockwood, and therefore the Longwell Green Ring Road. It is noticeable that the ring road was purpose built, has no residential areas facing on to the road and was built around, rather than dividing existing communities.</p> <p>Why are the residents of Whitchurch not being afforded the same consideration.</p> <p>This proposed road is surely unlawful and contravenes the medical and moral guidance of our times. There is nothing about your development that will improve my community and the residents of Whitchurch are not prepared to accept this horrific destruction of our green belt, our home, our lives.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Miss Corinna Underhill
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
Any other comments
<b>Comment</b>
<p>This road is a horrible prospect! We should be supporting new developments, not tearing down any possibility of getting onto the property chain. I am a first-time buyer of the nearby housing development and having this horrible, noisy and polluting road near me will bring my house price down and therefore effects my possibility of moving later on. Not only will it be a polluting, the noise pollution will be horrible. I have chosen to live away from main road to enjoy the picturesque landscapes and quiet surrounds and this will destroy it!</p> <p>We should be supporting landscapes that are so beautiful. There is local farming and horse businesses which will be affected due to the constant roadworks which will be noisy and therefore affecting their businesses. Not to think when the road is possibly finished and the animals will be breathing the pollution and enduring the dreadful noises. Why ruin it when then Bristol traffic will always be congested, find a different route!</p> <p>Once again, the wildlife will suffer due to this road. We have wiped out 60% of animal populations, why does this need to continue? To make matters worse, because of roads like these; we have lost over 80% of hedgehogs and this road will only continue to decrease these numbers.</p> <p>Please consider those around the road rather than the obnoxious people who will maybe use it, even though the roads and routes today are fine</p> <p>I object the road!</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Peter Van Peborgh
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
<p>The new BA&amp;NES Local Neighbourhood Plan 2016-2036 for Writhlington proposes that there is suitable land available for development in the area of Manor Road (RAD26 and RAD25)</p> <p>I want this proposal to be removed from the plan because:</p> <ol style="list-style-type: none"><li>1. These are green field sites outside of the Housing Development Boundary.</li><li>2. Writhlington has already exceeded its quota for 50 dwellings for 2016 - 2029 because 58 new dwellings have been built in the last 18 months. So there should be no further building development until at the earliest 2029.</li><li>3. It would go against BANES Green Infrastructure Policy.</li><li>4. The road infrastructure is already overloaded and dangerous.</li><li>5. 1500 children's lives are at risk every day at the A362 junction with Knobsbury Lane and Manor Road.</li><li>6. Any building work is inappropriate because the area is remote from existing effective drainage and sewage systems.</li></ol> <p>Why do you not build in Stone Cross or the closed down Bibby Bag Factory in Midsomer Norton?</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Miss Charlotte Veale
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
I wish to comment on the proposal to turn Whitchurch Lane into the South Bristol Ring Road. I live on Half Acre Close and am very much against the new road as I feel this will only add to the congestion, air pollution and noise.



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Ms Sue Walker
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS4 - Review of Rural Areas Site Allocations
<b>Comment</b>
<p>I would like to comment on the unsuitability of building on the north side of Temple Inn Lane, adjacent to the A37. Over the last two years, 70 houses have been built directly opposite me, on the south side, diminishing the quality of life in Temple Cloud considerably. To have more building so close by would only increase the problems.</p> <p>The air quality in Temple Cloud has been acknowledged to have reached unacceptable levels. More houses here would only exacerbate this. We have lost one large area that was used for walking, dog walking and enjoying wildlife (no more deer, or owls to be seen now). Please don't build on the other main field that is used by many villagers for dog walking. If building took place behind me there would be little access to green space.</p> <p>There is very little in the way of infrastructure here. The recent development has stretched what we do have, e.g. the doctor's surgery, and primary school.</p> <p>I already feel hemmed in by the houses opposite, and the ones that were built recently next to the pub, which look directly into my back garden. In the front, I no longer see the dawn coming up, my car stays frosty for hours longer than it used to, and my front garden is now shady where it used to be sunny. If building takes place in the field at the back of me, I probably wouldn't have any sun there too. The back garden faces north-west, so there is limited sun for 6 months of the year now.</p> <p>I love gardening, and did love painting the view to the front. I feel much less happy living here since the 70 houses went up opposite, and if the same thing happened at the back, I would be extremely unhappy. It would seem like all the open space in this central part of the village had been destroyed.</p> <p>I hope you will consider the options very carefully before deciding where to build. I would much prefer Option 1 to happen, with building taking place in Midsomer Norton and Radstock, where there are more amenities. Please don't damage our beautiful villages any further. I would like my 5 year old grand-children, who live in Temple Cloud, to have access to the field behind me, like my children did. It enhances the quality of life, and feeling of well-being no end.</p> <p>Since the houses went up opposite, I have been ill much more often, and do wonder if the loss of open-ness and staring at brick walls, instead of a beautiful field and woods, has contributed to this.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Pamela Watton
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH1 - Strategic Planning Framework
<b>Comment</b>
<p>The Whitchurch village development proposals are unsustainable, there are more sustainable locations that should be considered.</p> <p>The proposals are for unsustainable development within the Greenbelt and an area of significant flooding.</p> <p>The additional traffic would have a severe negative impact on Whitchurch Lane, its residents and Bridge Farm Primary School.</p> <p>This additional traffic and its effect on junction and capacity of Whitchurch Lane have not been effectively considered as part of the supporting documents and the transport studies have errors and are missing key information.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	mrs karen watts
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH7 - Transport
<b>Comment</b>
<p>I would like to object to new proposed plans to build a ring road for whitchurch Lane,Bristol otherwise known as Orbital Highway.My reasons to object is this will severly impact on Whitchurch area,to which I have been a resident for 40 years,causing major congestion,noise and air pollution to an already bustling area.I oppose this plan greatl yas the whitchurch village developemnt proposals is unsustainable especially when there are more sustainable locations that should be considered.Significant,severe traffic,congestion and pollution on Whitchurch lane and surrounding roads will negatively impact local residents including Bridge Farm School.It impacts on the Green Belt area and area of significant flooding.Significant effects on junctions and capacity of Whitchurch Lane have not been effectively considered as part of the supporting documents and transport studies have errors and missing key information which is unjust.For all these reasons I object to these plans.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Vikki Wherlock
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH12 - Other comments on Chapter 6
<b>Comment</b>
<p>I feel for the residents around this area that are now going to be surrounded busy busy main road, losing acres of green land and further air pollution surrounding their children. People would have chosen this area for a reason and now they are going to be surrounded by a car park.</p> <p>I work in Whitchurch and this no doubt have a impact on me also.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Miss Tanya Whittle
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH12 - Other comments on Chapter 6
<b>Comment</b>
<p>I am writing to strongly object to the proposal of 2000 homes and an Orbital Road (rat run) in Whitchurch. I am absolutely disgusted, saddened and very distressed that this is even being proposed. The proposal is unsound for many reasons.</p> <p>Bath and North East Somerset Council and Bristol City Council can write to all residents informing them that council tax has gone up, but at no point have residents received any information from either council with reference to this proposal, even though this proposal will affect people’s lives dramatically. This is hardly a fair consultation process when many people are totally unaware of this and it is bound to affect people’s lives dramatically and future decisions. I am only aware of this from social media and some leaflets posted by independent organisations. Therefore, this consultation is fundamentally unsound.</p> <p>The NPPF states “The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open”. In your Local Plan, the Green Belt Assessment of Green Belt Purposes Cell 52G Purpose 1 (sprawl) Major Contribution. Purpose 3 (encroachment) Contribution. The proposal of the Orbital road is in cell 52G putting a road through here puts a VERY HIGH risk to open opportunities for developers to develop around this creating urban sprawl. This area is important to keep in Green Belt to protect against urban sprawl and the boundary</p> <p>To propose a Bristol Ring Road, South Bristol Link Road, or Orbital Road coming out onto Half Acre Lane/ Washing Pound Lane leading onto Whitchurch Lane is ridiculous. Half Acre Lane is a 20mph speed limit with Bridge Farm Primary School on this road. At peak times this area is full of children, parked cars, the pavement has been widened at the school gate on Half Acre Lane which has not worked as cars crash into the pencils quite frequently. To put the link road via here will make the road hazardous and dangerous for the children.</p> <p>Currently Whitchurch Lane has a weight restriction in place, I have heard this may be removed so HGVs can travel through Whitchurch Lane, assuming Half Acre or Washing Pound Lane as well. If this is true, this road will be horrendous, as the roads are not designed at all for this. I assume the weight restriction on Whitchurch Lane at present is either for physical or environmental reasons, is the road able to accommodate an increase in weight?</p> <p>The purpose of weight limits: -          Prevent damage to the highway          Protect the character and environment of rural areas, villages and residential estates          Manage congestion on our roads</p>

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**Representations received online:**

Reduce risk to vulnerable road users, including pedestrians and cyclists.

So, you now feel that Whitchurch Lane requires none of these!!

Bath and North East Somerset quote on BANES website "by introducing 20mph speed limits on local streets we are improving road safety even further" Half Acre Lane and Whitchurch Lane are 20mph and should stay 20mph.

As a previous resident on Whitchurch Lane I know how busy and noisy this road is. It was a 30mph speed limit, but the road was dangerous, so chicanes were put in place. This did not last long as they were deemed dangerous, and many accidents happened. The chicanes were removed, and speed bumps and speed reductions were put in place to a 20mph limit. Has council policy changed now, 30mph is suddenly a safe speed whilst dramatically increasing the number of vehicles using this road. Getting onto Whitchurch Lane from adjoining roads is already hazardous with 2000 more homes being built on Hengrove Park and the proposed 2000 homes in Whitchurch Village this can only get worse. This road will be even more congested, Bristol City Council said an increase of 80%, which is disgusting, noise and pollution levels will be awful.

BANES have said traffic pollution level is not dangerous, has this been tested with another 2000 homes, 3500-4000 cars using the road? It should be. Has BANES even looked/walked the route of this proposed new road, do you know this area, if this was seriously being investigated you would know this is not a suitable route.

BANES quote new cycle routes walking routes, have any surveys been done to see who would cycle or bus/walk to work, where peoples employment is. This is all done on assumption that people can/would use it. Metrobus is hardly an unmitigated success!

I am a cyclist, I see more people walking their dogs in the fields you propose to put a road through than I see cycling on the Hartcliffe Way at peak times.

The field off Half Acre Lane has a public footpath where people regularly walk their dogs, these fields should be kept as Village Green Space. There are also 2 farms in this location putting a road through here could potentially put the farms out of business.

BANES quote to create imaginative play, forest and meadow habitat? Why are we creating this, we have this already which you want to take away? Walking my dog for 1 hour in the fields the other day I had the pleasure of seeing so much wildlife we spotted, cows, deer, squirrel, Jay, Wood Pecker, Pheasant and hare. This is what is so amazing about Whitchurch, you are ruining it for future generations. It is an amazing environment with open countryside and most importantly promoting health/wellbeing.

JSP quote no dwellings to be built without the road/park and ride. Whitchurch is not suitable for this road at all. The proposed road is not fit for purpose. It will have a devastating effect on the area and would no longer be a place where I would want to live.

Regards

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr John Whittock
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 3 - Spatial Strategy including the rural areasSS5 - Other comments on Chapter 3
<b>Comment</b>
<p>The new local plan for 2016-2036 is proposing a housing development (RAD26 and RAD25). I am not in favour of this development and wish for these to be removed from the plan. My reasons are as follows:</p> <ol style="list-style-type: none"><li>1. These are Green Field sites and outside the Housing Development Boundary.</li><li>2. Writhlington has already exceeded its quota for new houses in the 18 months. Therefore, no further housing should be considered till 2029</li><li>3. This development contravenes the BANES' Green Infrastructure Policy</li><li>4. The road infrastructure is already overloaded and dangerous (we have experienced several incidents of vehicle threats to our personal safety)</li><li>5. 1500 children's lives are at risk every day at the road junction with Knobsbury Lane and Manor Road</li><li>6. Any building work is inappropriate because there is no likelihood of effective drainage or sewage systems. A housing development would have a negative impact on the water table producing water spillage into the houses at Lower Writhlington</li></ol>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mrs Sonya Williams
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH3 - Strategic Design Objectives
<b>Comment</b>
I oppose the planned route of the ring road joining via roundabout near Church Road in Whitchurch and running along side Bridge Farm Primary school. This road (Half Acre Road) is very congested at present st school drop off and collection times. Let alone having HGV and increased traffic if this route is selected.



**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Christopher Wilmot
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 4 - Bath
<b>Comment</b>
<p>I NOTE IN 4.4.2 IT IS STATED that there is a "Student preference for living in the city" seemingly to justify the rampant taking over of relatively affordable houses for student HMOs. I find this justification abhorrent since, believe it or not, most young couples, workers , families etc would also prefer to live in the city. It implies that students ( TEMPORARY residents remember ) take priority over ordinary people who would stay and work long term in Bath AND pay their Council Tax!! But because prices have been forced up by landlords any , anyway , there are none of these houses left ( see Oldfield Park for example) they have to live outside Bath and therefore add further to the traffic problem as they come in to work . There should be a blanket ban , city wide , on all new student HMOs and Student Blocks and let them commute from outside the city instead. Also. Landlords who wish to sell a student HMO should be incentivised to either sell to a couple/family OR to sharing Working people.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Miss Victoria Wootten
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)
<b>Comment</b>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	Mr Roger Worner
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH12 - Other comments on Chapter 6
<b>Comment</b>
<p>Whilst it is hard to argue against the need for further housing in the South Bristol area, the development proposed is grossly overstated (a total of perhaps 800 would be more sustainable). Living within the Bristol Boundary I and many others have grave concerns in particular regarding the additional roads proposed. Figures of 900 extra vehicle movements on Whitchurch Lane are being bandied around - Whitchurch Lane is currently almost at gridlock between 7am and 10am and 3pm to 7pm on a daily basis. Adding large numbers of extra vehicles including LGV's onto a road which currently has a 7.5 ton limit and cannot be expanded will mean that I and many others will be virtually living in a car park and the traffic pollution in my home will rise exponentially. Additionally the proposed routes for this link appear to use Washingpound Lane - a lane which cannot be expanded due to its location and existing dwellings. The alternative appears to be to drive a road across farm land - splitting more than one farm - and coming out on Half Acre Lane or Whitchurch Lane. Any link will force traffic past Bridge Farm Primary School where it is currently very difficult to cross Whitchurch Lane at School Run times. If a no parking zone was implemented on Whitchurch Lane this would push parents further onto residential roads which are already dangerously clogged at these times. The Planners need to get out of their Ivory Towers and do a proper impact survey on what a link from the A37 onto Whitchurch Lane would entail. Unless a very inexpensive public transport is a result of these proposals is forthcoming I cannot see anyone who takes up residence in any such development, doing anything other than using their cars. It needs to be stressed that 2500 dwellings inevitably means 5000 cars from the outset and double that within 10 years as children grow up and need transport. Perhaps alternatives would be to either reopen the old North Somerset Railway route as a light railway from a Park and Ride on the edge of Whitchurch down through Stockwood and into the Temple Meads area, or to extend the Ring Road as was originally proposed along the Dundry Foothills to link up with the A38 at the new Metrobus Link Road with links into the Whitchurch, Hartcliffe and Withywood areas.</p> <p>Also there is no mention of Affordable Housing and only scant proposals for Schools, Doctors Surgeries and local amenities to service the proposed dwellings. It can only be assumed that these would be the subject of Section 106 payments - which effectively rules out any affordable homes and defeats what should be the primary aim of any such developments. Developers rarely agree to the full payments if they are forced to provide low cost accommodation as can be seen regularly in the local newspapers.</p>

**B&NES LP 2016-2036 Options Consultation – Winter 2018**  
**Representations received online:**

**Respondent**

<b>Name</b>	
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
<b>Comment</b>

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**Respondent**

<b>Name</b>	
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
CHAPTER 6 - Whitchurch Strategic Development Location (SDL)WCH4 - Housing
<b>Comment</b>

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<b>Name</b>	Mrs
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
<b>Comment</b>



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<b>Name</b>	Mrs
<b>Agent (if applicable)</b>	

**Comment**

<b>Local Plan Section/Chapter</b>
<b>Comment</b>

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**Comment**

<b>Local Plan Section/Chapter</b>	
CHAPTER 8 - Development Management policiesDM10 -	Housing in Green Belt Villages
<b>Comment</b>	
<p>I have spent many hours attending meetings leafletting local residents over the last ten years and here we are again (Different titles used to be RSS) Why does Whitchurch have to be a dumping ground for Bath and North East Somerset Council The council have allowed developers to build and have destroyed most of the Green Belt to solve I believe Developers rule this country. "Housing Numbers" I would like to know how the numbers are calculated and from which government survey? It is my belief the number is pulled from the air and if enough people read it with no comment that is the number used.</p> <p><b>THE NEW ROAD PROPOSALS</b></p> <p>Would it be possible to publish the Airport Road plans which if my memory serves me correctly should have connected to Ring road then to Motorway system at Brislington money ran out and it was not completed so complete this road first See if it solves the problem. The new road proposal that makes no sense but of course it will only affect Whitchurch and Stockwood not Bath or Bristol City</p> <p>It would cause chaos and the pollution levels will be very high</p> <p>The school is being enlarged first we should see if the air is clean enough even without a new town and roads.</p> <p>A new road from Chelwood to the motorway system(maybe costly)would solve the heavy goods vehicles using the narrow lanes through our villages Pensford is a prime example'</p> <p>Let us not forget proposed extension to the Bristol International Airport that will affect this area many of us live on the flight path m0re pollution.</p> <p>I would just ask those responsible for these crazy ideas think again.</p> <p>Why can we not let every village have 50 new house mostly 2-3 bedroom homes this would help keep villages thrive and social needs may be kept. Sorry not too much profits for large developers but could give work to local builders and boost jobs</p>	
<b>Attachments Included</b>	

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**Comment**

<b>Local Plan Section/Chapter</b>
<b>Comment</b>