

Draft Placemaking Plan

December 2015



**Schedule of Public Consultation Comments
Not Duly Made**

Bath & North East
Somerset Council

Draft Placemaking Plan (December 2015)

Schedule of Public Consultation Comments (Not Duly Made)

A public consultation on the Draft Placemaking Plan took place from 16th December 2015 to 3rd February 2016. This schedule sets out the comments deemed 'Not Duly Made', for instance commenting on the Adopted Core Strategy text contained within the Draft Placemaking Plan which did not form part of the consultation.

The comments have been categorised and grouped by plan reference i.e. site number, policy number or paragraph number. Those comments putting forward alternative sites for allocation in the Plan for development have been categorised as 'Alternative Development Site'. Those comments relating to Local Green Spaces have been categorised under Policy LCR6A, sub-categorised by Local Green Space reference number or 'alternative site' where a new site not previously nominated has been proposed.

No comments were received in relation those parts of the Plan (sites, policies or paragraphs) not listed in this schedule.

The schedule of comments is produced in order to assist the Examination Inspector and other parties in considering the comments received by setting them out in plan order. The schedule has been submitted to the Planning Inspectorate, alongside the Draft Placemaking Plan, for Examination. In addition the Inspector has also been sent copies of the original representations submitted and the supporting information.

Please note that every effort has been made to correctly categorise all of the numerous comments received. Any errors in categorising do not impact on the Inspector's consideration of the issues raised through the Examination process.

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Schedule of Not Duly Made comments received (in Plan Order)

Plan Order Reference

Volume: 0, Whole Plan

Part: General comment

Respondent Number: 120 Comment Number: 1
Name: William Gaskell Organisation:
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')
Does the respondent consider the document is sound? No
If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):
Not Positively Prepared Not Justified Not Consistent Not Effective

The representation relates to: Volume 0 Whole Plan , General comment
The Site Reference (if applicable) is:

Q4 Soundness Comment

I think you should include a point about supporting people who go to the top school, Eton College, with something like Eton Rules! As this would be in keeping with Bath's WHS status vis a vis Adelard. Sorry if you don't agree, go somewhere else. As a city we hope to support people like William Gaskell who has a diplomatic Person of Indian Origin card and enjoying diplomatic status in the UK forever, who went to Eton and got his two physics degrees and is big in Bath with all the voluntary work he does and his political activeness etc. It's worth including his name in the planning document in order for it to count as official and specify why he is the best and is an exceedingly decent person that this city's purpose is to benefit. Otherwise give up and go home as I don't want to be traumatised further by breaches of statute law. In Bath WHS stands for William Herschel Society, please amend this document .

Q5 Change Requested

This point needs to be included above point 17 about student accommodation in the city:
" William Gaskell, public notary, who went to Eton and got his two physics degrees and is big in Bath with all the voluntary work he does and his political activeness etc. It's worth including his name in the planning document in order for it to count as official and specify why he is the best of Bathonians and is an exceedingly decent model that this city's purpose is to benefit. We wish him well in his love life and career in saving the world."
Furthermore, I find it offensive that you talk about locals schools as if they have UK government sanction. This would only be the case if you acknowledged the hierarchy in society. If you fail to get in to Eton you won't make money or get laid kind of thing. Abusing poor people is a statutory crime. It goes against the Christian religion. The emphasis in Bath is on society and getting in to the top school or doing the utmost to make up for that offence. They aren't like Jesus for failing to get in, they are like Islamic Gentiles or Good Samaritans, Jesus patently would have gone to a leading Public School in our society's paradigm, or one of the sanctioned schools – I disapprove of the behaviour of many of the violent, thuggish and offending youths as I would rather they were in prison than disturbing me. They grow up into enemies of the British State and I want compensation for having to accommodate them.

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

I am the leading member of society in this city so it would be necessary to involve me and seek my approval otherwise the game will fail as I am the principal player. My interests are not being represented by people who have a lesser local connection - do not have a decent address in Bath on the birth certificate, do not have family in Bath, have not been to a

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top school in the UK as a Bathonian, are not members of society such as BRLSI, WHS, Bath Abbey Congregation, Bath Conservatives etc. My interest needs to be number one on the list of priorities for this kind of consultation to make sense. Therefore I propose myself as the leading member of Bath society in the spirit of Beau Nash I will help to build a society based upon our heritage and the best things we have learned from around the world from the UN sponsorship and other schemes. Essentially, people are using this as an opportunity to mess around and I want to see them expelled from the process for saying anything against my interests as a Bathonian, as they are from outside and seek to destroy those the world has made from Bath. I should be made richer, healthier, more popular and more attractive to girls especially from abroad by this process and because of your shenanigans you are ruining my life in Bath.

Respondent Number: 837 Comment Number: 10
Name: David Redgewell Organisation: South West Transport Network
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')
Does the respondent consider the document is sound? No
If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):
Not Positively Prepared Not Justified Not Consistent Not Effective

The representation relates to: Volume 0 Whole Plan , General comment
The Site Reference (if applicable) is:

Q4 Soundness Comment

Would like to see site allocation 191 RA5 Housing Number extended beyond 2018

7. Ensure the integration of the area should be developed through a neighbour plan with a master plan including enhanced safe attractive pedestrian and cycle routes and bus stops on the main Greater Bristol Bus network corridor to Wells and Bristol

Q5 Change Requested

Reference to a neighbourhood Development Plan

Plan and improvement to local Bus Services To Keynsham Town Centre and Station at Keynsham and The Wells to Bristol Showcase Bus routes as part of The Greater Bristol Network

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

To debate the future Development and Safeguard of Housing Land in Whitchurch part of the Settlement Bridge farm in the City and County of Bristol Council Area.

Respondent Number: 837 Comment Number: 22
Name: David Redgewell Organisation: South West Transport Network
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

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Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')

Does the respondent consider the document is sound? No

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The representation relates to: Volume 0 Whole Plan , General comment

The Site Reference (if applicable) is:

Q4 Soundness Comment

Page 13 need to address public transport access to the Somer Valley and site for protecting the Rail Line alongside the cycleway to the Mendip Council Boundary

Q5 Change Requested

6 Transport the needs of the Somer Valley need better addressing in the Local Plan with Public Transport Corridors to From and Midsomer Norton Radstock to Bath City Centre NE1

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

No look at the Transport Need of their Placemaking Plan alongside the New Enterprise Zone for Radstock Midsomer Norton

Respondent Number: 6580 Comment Number: 4
Name: Andrew Lord Organisation: Cotswolds Conservation Board
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')

Does the respondent consider the document is sound? Yes, with minor changes

If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):

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The representation relates to: Volume 0 Whole Plan , General comment

The Site Reference (if applicable) is:

Q4 Soundness Comment

There is no specific Policy reference within CP6 to the nationally protected legal status of the AONBs.

Comment made on the adopted core strategy

Q5 Change Requested

The Cotswolds Conservation Board recommends inclusion of reference to the AONB, its Management Plan and its Position Statements and development in its setting. There is a legal requirement under Section 85 of the CRoW Act 2000 for the Council to have regard to the purpose of "conserving and enhancing the natural beauty" of the AONB. Paragraph 115 of the NPPF also confirms AONBs as having the "highest status of protection in relation to landscape and scenic beauty." This enhanced level of protection should be fully recognised by local planning authorities (Paragraph 113 of the NPPF). (The Board's Position Statement on Setting has been attached).

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Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

Respondent Number: 7068 Comment Number: 1
Name: George Ardrey Organisation:
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')
Does the respondent consider the document is sound? Yes, with minor changes
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The representation relates to: Volume 0 Whole Plan , General comment
The Site Reference (if applicable) is:

Q4 Soundness Comment

DIAGRAM 20 shows the banks of the stretch of the River Avon bounding between Bathampton and Batheaston as being part of a Strategic Green Infrastructure Corridor, whereas I believe that the area is classified as a Nature Reserve and so might be designated as a Strategic Nature Area

Q5 Change Requested

DIAGRAM 20 to be amended to show banks of River Avon between Bathampton and Batheaston at its Northern curvature to be in yellow.

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

Respondent Number: 7078 Comment Number: 2
Name: Jon Watkins Organisation: RIBA South West and RIBA Bath Architects Group
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')
Does the respondent consider the document is sound? Yes, with minor changes
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Q4 Soundness Comment

Policy B4:

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There is a strong presumption against development that would result in harm to the Outstanding Universal Value of the World Heritage Site, its authenticity or integrity. Particularly in Bath, the quality of design has been overlooked for too long, and decisions made on the basis of the preferences of officer/members and local popular opinion, rather than as a result of some informed and intelligent debate about what constitutes good design.

Unfortunately, the result has been a long trend of new buildings in central Bath defaulting to the most obvious solution of a neo classical / facsimile Georgian style. The fake is by definition of intrinsically lower cultural and artistic value than the original. Even a high quality facsimile devalues the original that it sits next to because it is hard to tell the difference, whereas a poor quality fake is in every way of lower value.

We have a responsibility to look after and conserve our heritage, and we do not necessarily do this by turning the city into a Georgian theme park where visitors and even residents find it difficult to tell what is old and what is new. Legibility is a key principle in conservation practice. We need to have the confidence to build high quality new architecture in the city, so we need to understand what we mean when we talk about high quality. And we need to have a planning system that is capable of recognizing high quality and poor quality which is why we so urgently need a Design Review system as a forum for enabling this debate to take place.

We would also take this opportunity to encourage the Local Authority to invest in the training of both officers and decision making members of the Council, to help underpin the objective of raising design standards. The RIBA would be happy to assist in this objective.

Q5 Change Requested

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

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Schedule of Not Duly Made comments received (in Plan Order)

Plan Order Reference

Volume: 0, Whole Plan

Part: Whole Plan general

Respondent Number: 194 Comment Number: 2
Name: John Webb Organisation:
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')
Does the respondent consider the document is sound?
If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):
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The representation relates to: Volume 0 Whole Plan , Whole Plan general
The Site Reference (if applicable) is:

Q4 Soundness Comment

These are limited to what may be described as fundamental flaws rather than detailed comments as to content. As such perhaps my comments could best be described as being only an aid memoir should this document be relied on for responses to future planning applications/proposals.

Volume 1 covers "District wide" elements, this having been used by Ian for his read through, and Volume 2 covers matters pertaining only to the City of Bath and its immediate environs. Keynsham is given its own "volume" numbered 3. I will include its limited reference to the river in my comments on Volume 1.

As to be expected from our Council the document is high on jargon, low on specifics and heavily reliant on hiding behind many other referenced reports and publications.

When this document was first mooted I advocated the river corridor being allocated a "place" in its own right. This never happened.

Q5 Change Requested

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

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Schedule of Not Duly Made comments received (in Plan Order)

Plan Order Reference

Volume: 1, District Wide

Part: Para 22

Respondent Number: 6176 Comment Number: 1
Name: John Eddison Organisation:
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')
Does the respondent consider the document is sound? Yes, with minor changes
If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):
Not Positively Prepared Not Justified Not Consistent Not Effective

The representation relates to: Volume 1 District Wide , Para 22

The Site Reference (if applicable) is:

Q4 Soundness Comment

Para 22-28. Change should not be considered a strategic issue, being a questionable concept. However, some of the proposals identified under that heading (para 23) are worthy of action, though the targets may be unrealistic. Is inequality a strategic issue or more of an ongoing tactical one?

There is likely to be a serious conflict between greater local food growing and housing etc provision
Has the strategy been aligned with those of neighbouring Councils?

The strategy appears to have all the right aspirations, and clearly recognises Bath's special status, but how achievable are these ideas? For example, reducing car entry into and through the city is a sound aim, but effort at present at least seems to focus more on making driving difficult overall rather than making it easier where it is desired for it to go. (I will say no more about the pointless rash of 20 mph signs.)

Q5 Change Requested

Further work to address and resolve the above points

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

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Schedule of Not Duly Made comments received (in Plan Order)

Plan Order Reference

Volume: 1, District Wide

Part: Objective 1

Respondent Number: 297 Comment Number: 1
Name: Organisation: Arena 1865 Ltd
Agent Name: Tim Burden Agent Organisation: Turley
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')
Does the respondent consider the document is sound? Yes, with minor changes
If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):
Not Positively Prepared Not Justified Not Consistent Not Effective

The representation relates to: Volume 1 District Wide , Objective 1
The Site Reference (if applicable) is:

Q4 Soundness Comment

Objective 1, "Climate Change", of the draft PMP aims to pursue a low carbon sustainable future in a changing climate. Our clients are committed to the development of a new stadium that addresses the challenges of climate change and that secures economic, social and environmental benefit. We do however have a number of concerns with regards to the sustainability and climate change policies of the Core Strategy, and how these will create commercial and technical challenges for a new stadium at the Rec, given that sports stadiums are very unique in their design and energy profiles. 4.3 These representations have been submitted to highlight these concerns to the Council in order to seek flexibility within the draft policies. At this stage the Club is keen to present our views constructively whilst also providing positive feedback to those policies that will result in benefits to the Club and City.

Q5 Change Requested

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

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Schedule of Not Duly Made comments received (in Plan Order)

Plan Order Reference

Volume: **1, District Wide**

Part: **Objective 5**

Respondent Number: 6426 Comment Number: 3
Name: Organisation: Persimmon Homes Severn Valley
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')

Does the respondent consider the document is sound? No

If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):

Not Positively Prepared

Not Justified

Not Consisten

Not Effective

The representation relates to: Volume 1 District Wide , Objective 5

The Site Reference (if applicable) is:

Q4 Soundness Comment

We also think that Objective 5 needs to be revisited. This aims to enable the delivery of new homes 'as far as possible' to support labour supply to meet economic objectives. In order to accord with the objectives of the West of England LEP we consider the words as far as possible should be deleted and the aim should be to deliver sufficient new homes necessary to support labour supply and fully meet economic development objectives.

Q5 Change Requested

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

Draft Placemaking Plan Consultation

Schedule of Not Duly Made comments received (in Plan Order)

Plan Order Reference

Volume: 1, District Wide

Part: Para 58

Respondent Number: 6176 Comment Number: 2
Name: John Eddison Organisation:
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')
Does the respondent consider the document is sound? Yes, with minor changes
If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):
Not Positively Prepared Not Justified Not Consistent Not Effective

The representation relates to: Volume 1 District Wide , Para 58

The Site Reference (if applicable) is:

Q4 Soundness Comment

Para 58. Agree increasing student numbers should be housed on campus. No sound argument for building on the green belt, which appears to contradict the wider strategy. Are house building targets realistic?

Q5 Change Requested

Further work to address and resolve the above points

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

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Schedule of Not Duly Made comments received (in Plan Order)

Plan Order Reference

Volume: 1, District Wide

Part: Policy DW1

Respondent Number: 2723 Comment Number: 2
Name: Matt Humberstone Organisation: University of Bath Students' Union
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')
Does the respondent consider the document is sound? No
If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):
Not Positively Prepared Not Justified Not Consistent Not Effective

The representation relates to: Volume 1 District Wide , Policy DW1
The Site Reference (if applicable) is:

Q4 Soundness Comment

The growth aspirations and changing demographics of both universities in Bath mean that meeting the previously assessed need will not provide sufficient housing

Q5 Change Requested

The housing need should be recalculated with input from both universities following their declarations of growth aspirations to ensure that the Council meets the new total assessed need which will have increased

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

There is significant concern that student housing needs will not be met

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Schedule of Not Duly Made comments received (in Plan Order)

Plan Order Reference

Volume: 1, District Wide

Part: Diagram 4 Key Diagram

Respondent Number: 2723 Comment Number: 3
Name: Matt Humberstone Organisation: University of Bath Students' Union
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')
Does the respondent consider the document is sound? No
If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):
Not Positively Prepared Not Justified Not Consistent Not Effective

The representation relates to: Volume 1 District Wide , Diagram 4 Key Diagram
The Site Reference (if applicable) is:

Q4 Soundness Comment

The growth aspirations and changing demographics of both universities in Bath mean that meeting the previously assessed need will not provide sufficient housing

Q5 Change Requested

The housing need should be recalculated with input from both universities following their declarations of growth aspirations to ensure that the Council meets the new total assessed need which will have increased

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

There is significant concern that student housing needs will not be met

Draft Placemaking Plan Consultation

Schedule of Not Duly Made comments received (in Plan Order)

Plan Order Reference

Volume: 1, District Wide

Part: Policy CP5

Respondent Number: 262 Comment Number: 1
Name: Justin Milward Organisation: Woodland Trust
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')
Does the respondent consider the document is sound? No
If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):
Not Positively Prepared Not Justified Not Consistent Not Effective

The representation relates to: Volume 1 District Wide , Policy CP5

The Site Reference (if applicable) is:

Q4 Soundness Comment

P5 Flood Risk Management

We would like to see this policy, AND supporting text, amended to include the increasingly recognised benefits that trees and woodland can deliver to positive water quality and flow outcome, including SuDS.

The Woodland Trust believes that trees and woodlands can deliver a major contribution to resolving a range of water management issues, particularly those resulting from climate change like flooding and the water quality implications caused by extreme weather events. They offer opportunities to make positive water use change whilst also contributing to other objectives, such as biodiversity, timber & green infrastructure - see the Woodland Trust publication Woodland actions for biodiversity and their role in water management (pdf). In addition, a joint Environment Agency/Forestry Commission publication Woodland for Water: Woodland measures for meeting Water Framework objectives states clearly that: 'There is strong evidence to support woodland creation in appropriate locations to achieve water management and water quality objectives' (Environment Agency, July 2011-<http://www.forestry.gov.uk/fr/woodlandforwater>).

The Government's Independent Panel on Forestry (Defra, Final Report, July 2012) has emphasised these benefits by stating that:

'One of the many benefits of woods and trees is their ability to help us respond to a changing climate, better enabling us to adapt to future temperature increases. We know that trees, in the right places, help us to adapt to climate change by reducing surface water flooding; reducing ambient temperature through direct shade and evapo-transpiration; and by reducing building heating and air-conditioning demands. A landscape with more trees will also help increase the resilience of our rural areas, by reducing soil erosion and soil moisture loss. Improving the condition of existing woodlands, and the creation of a more resilient ecological network of associated habitats, will help wildlife adapt to climate change and other pressures'. This has been endorsed by the response in the Government Forestry Policy Statement (Defra Jan 2013) with the key objective (p.23) 'Work with other organisations and initiatives to support the further development of markets in forest carbon and other ecosystem services such as water and biodiversity', together with a Cumbria case study (p.22 - SCaMP) on water benefits from woodland creation.

Woodland can help adaptation strategies cope with the high profile threats to water quality and volume resulting from climate change. The Forestry Commission's publication, The Case for Trees in development and the urban environment (Forestry Commission, July 2010), explains how: 'the capacity of trees to attenuate water flow reduces the impact of heavy rain and floods and can improve the effectiveness of Sustainable Urban Drainage Systems'.

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Trees can reduce the likelihood of surface water flooding in urban situations, when rain water overwhelms the local drainage system, by regulating the rate at which rainfall reaches the ground and contributes to run off. Slowing the flow increases the possibility of infiltration and the ability of engineered drains to take away any excess water. This is particularly the case with large crowned trees. Research by the University of Manchester has shown that increasing tree cover in urban areas by 10 percent reduces surface water run-off by almost 6 percent. (Using green infrastructure to alleviate flood risk, Sustainable Cities - www.sustainablecities.org.uk/water/surface-water/using-gi/).

The Woodland Trust has produced a policy paper illustrating the benefits of trees for urban flooding – Trees in Our Towns – the role of trees and woods in managing urban water quality and quantity (<https://www.woodlandtrust.org.uk/mediafile/100083915/Trees-in-our-towns.pdf>).

In rural areas, integrating trees into farming systems can improve water quality and help mitigate flooding, while also supporting production, as set out in the Woodland Trust's paper Planting Trees to Protect Water – The role of trees and woods on farms in managing water quality and quantity -

<https://www.woodlandtrust.org.uk/publications/2012/08/planting-trees-to-protect-water/>.

A good illustration of the role of trees delivering water outcomes in rural situations is the Pontbren Project, a farmer led approach to sustainable land management in the uplands which discovered that tree planting had unexpected benefits in reducing water run-off from improved grassland – see report

<https://www.woodlandtrust.org.uk/publications/2013/02/the-pontbren-project/>. The Government Forestry Policy Statement (Defra Jan 2013, p.22) provides a good example of United Utilities planting 700 hectares of woodland in Cumbria to benefit water quality in their SCaMP project.

The Environment Agency and Forestry Commission, together with the Woodland Trust, have developed a Midlands 'Woodland for Water' opportunity mapping exercise to prioritise those areas where woodland creation would most benefit water flow and quality - <http://www.forestry.gov.uk/website/forestresearch.nsf/ByUnique/INFD-97XGXX>.

The Woodland Trust has carried out a number of partnership riparian planting projects across the country, particularly along the Rivers Frome & Piddle in Dorset. Examples of using trees for flood mitigation can be found in our WoodWise publication - <https://www.woodlandtrust.org.uk/mediafile/100091022/9-Wood-Wise-Winter-2013.pdf>.

The Government's new agri-environment Countryside Stewardship scheme specifically targets woodland creation towards water benefits and it is therefore likely that this will represent a new funding resource for flood mitigation. The National Flood Forum too (<http://www.nationalfloodforum.org.uk/about-us/>) is supporting community action for flooding that can link in to community tree planting schemes.

Indeed paragraph 272 (Trees & Woodland Conservation) makes specific reference to the role of trees in reducing stormwater run off.

Good examples of local plan policy on woodland and flooding are -

Herefordshire Local Plan Core Strategy 2011-31; adopted October 2015

"5.3.54 Land management practices can also play a vital role in managing flood risk and water quality at a local level; for example, the creation and restoration of wetlands and woodlands can reduce the level of flooding, and in some cases remove the risk of local flooding altogether. These practices also improve water quality in addition to producing wider environmental benefits, including encouraging an increase in wildlife species and habitats and reducing carbon".

Stroud District Local Plan - Adopted November 2015 Delivery Policy ES4 - Water resources, quality and flood risk

"New development in areas with known ground and surface water flooding issues will seek to provide betterment in flood storage and to remove obstructions to flood flow routes where appropriate.

Development will:

5. Use the natural environment including woods and trees to deliver sustainable water issue solutions".

Q5 Change Requested

We would therefore like to see Policy P5 include text along the lines of "Riparian and other targeted tree planting to be carried out to protect watercourse banks, improve water quality and slow down excessive surface water flow, including the use of trees in SuDS".

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Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

Draft Placemaking Plan Consultation

Schedule of Not Duly Made comments received (in Plan Order)

Plan Order Reference

Volume: 1, District Wide

Part: Para 170

Respondent Number: 2723 Comment Number: 10
Name: Matt Humberstone Organisation: University of Bath Students' Union
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')
Does the respondent consider the document is sound? No
If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):
Not Positively Prepared Not Justified Not Consistent Not Effective

The representation relates to: Volume 1 District Wide , Para 170

The Site Reference (if applicable) is:

Q4 Soundness Comment

The growth aspirations and changing demographics of both universities in Bath mean that meeting the previously assessed need will not provide sufficient housing

Q5 Change Requested

The housing need should be recalculated with input from both universities following their declarations of growth aspirations to ensure that the Council meets the new total assessed need which will have increased

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

There is significant concern that student housing needs will not be met

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Plan Order Reference

Volume: 1, District Wide

Part: Policy CP6

Respondent Number: 244 Comment Number: 5
Name: Susan E Green Organisation: Home Builders Federation
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')
Does the respondent consider the document is sound?
If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):
Not Positively Prepared Not Justified Not Consisten Not Effective

The representation relates to: Volume 1 District Wide , Policy CP6
The Site Reference (if applicable) is:

Q4 Soundness Comment

With reference to Policy CP6 Bullet Point (b) the Council's understanding of Building for Life 12 scoring should be re-assessed. It is understood that a score of 9 out of 12 greens rather than 12 greens from an independent assessor forum would be sufficient to warrant Building for Life 12 status.

Q5 Change Requested

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

Respondent Number: 6426 Comment Number: 6
Name: Organisation: Persimmon Homes Severn Valley
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')
Does the respondent consider the document is sound? No
If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):
Not Positively Prepared Not Justified Not Consisten Not Effective

The representation relates to: Volume 1 District Wide , Policy CP6
The Site Reference (if applicable) is:

Q4 Soundness Comment

Policy CP6 - Environmental Quality
We consider the policy interpretation of Building for Life 12 in sub-paragraph B is incorrect. This says that development

Draft Placemaking Plan Consultation

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should seek to achieve a score of no reds and design out all ambers implying that a score of 12 greens is necessary. The aim of Building for Life 12 is to secure as many greens as possible, minimise the number of ambers and avoid reds. However it says that development that achieves 9 greens is eligible for 'Build for Life' accreditation. Sub-paragraph B should be amended to make this clear.

Reword to say 'as a guide development should seek to secure as many greens as possible, minimise the number of amber and avoid red but in any event achieve 9 greens in order to secure built for life accreditation'. The plan is unsound because this policy is contrary to National Policy.

Q5 Change Requested

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

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Schedule of Not Duly Made comments received (in Plan Order)

Plan Order Reference

Volume: 1, District Wide

Part: Policy D5

Respondent Number: 224 Comment Number: 20
Name: Caroline Kay Organisation: Bath Preservation Trust
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')
Does the respondent consider the document is sound? No
If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):
Not Positively Prepared Not Justified Not Consistent Not Effective

The representation relates to: Volume 1 District Wide , Policy D5
The Site Reference (if applicable) is:

Q4 Soundness Comment

Modern innovative design is contrasted with traditional design which is given a specific context.

Q5 Change Requested

Replace with 'Good quality thoughtful and innovative design, whether in a modern or traditional idiom, needs to respond appropriately to its context.'

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

The Bath Preservation Trust made several substantive submissions in relation to the original core strategy and appeared at the hearings for the Core Strategy. We continue to have significant matters to raise on certain points of the placemaking plan

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Schedule of Not Duly Made comments received (in Plan Order)

Plan Order Reference

Volume: 1, District Wide

Part: Para 279

Respondent Number: 256 Comment Number: 9
Name: Cllr Andrew Furse Organisation:
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')
Does the respondent consider the document is sound?
If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):
Not Positively Prepared Not Justified Not Consistent Not Effective

The representation relates to: Volume 1 District Wide , Para 279

The Site Reference (if applicable) is:

Q4 Soundness Comment

Transportation 279

I note and support; "The disused rail line between Brassmill Lane and Windsor Bridge, Bath is safeguarded as a Sustainable Transport route for non-motorised forms of transport (with the exception of mobility scooters). It will provide a high quality and safe cycling and pedestrian route through to Western Riverside".

Q5 Change Requested

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

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Schedule of Not Duly Made comments received (in Plan Order)

Plan Order Reference

Volume: 1, District Wide

Part: Policy CP7

Respondent Number: 7217 Comment Number: 1
Name: Peter Roberts Organisation: Barton Willmore
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')
Does the respondent consider the document is sound? No
If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):
Not Positively Prepared Not Justified Not Consistent Not Effective

The representation relates to: Volume 1 District Wide , Policy CP7
The Site Reference (if applicable) is:

Q4 Soundness Comment

We object to the proposed designation of the Green Infrastructure policy for land at Whitchurch. The annotation on the proposals map shows a wide GI corridor running through land proposed as an option for development through the Joint Spatial Plan. Whilst we do not object to the principle of the proposed policy, the extent of the corridor should be reduced and it should be made clear that the extent of the corridor is indicative only and should not be taken literally. The aim should be for green infrastructure to be incorporated within new developments, not to prevent the development of sustainable new communities. Without this change, the policy would be unsound as it would not be justified.

Q5 Change Requested

The designation of Green Infrastructure should be amended to make clear that it is illustrative only.

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

To fully explain the reasons for the requested changes and expand on the context of these representations.

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Schedule of Not Duly Made comments received (in Plan Order)

Plan Order Reference

Volume: 1, District Wide

Part: Diagram 20 Illustrative Green Infrastructure Network

Respondent Number: 7217 Comment Number: 2
Name: Peter Roberts Organisation: Barton Willmore
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')
Does the respondent consider the document is sound? No
If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):
Not Positively Prepared Not Justified Not Consistent Not Effective

The representation relates to: Volume 1 District Wide , Diagram 20 Illustrative Green Infrastructure Network
The Site Reference (if applicable) is:

Q4 Soundness Comment

We object to the proposed designation of the Green Infrastructure policy for land at Whitchurch. The annotation on the proposals map shows a wide GI corridor running through land proposed as an option for development through the Joint Spatial Plan. Whilst we do not object to the principle of the proposed policy, the extent of the corridor should be reduced and it should be made clear that the extent of the corridor is indicative only and should not be taken literally. The aim should be for green infrastructure to be incorporated within new developments, not to prevent the development of sustainable new communities. Without this change, the policy would be unsound as it would not be justified.

Q5 Change Requested

The GI annotation should be reduced in size and made clear it is illustrative only.

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

To fully explain the reasons for the requested changes and expand on the context of these representations.

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Schedule of Not Duly Made comments received (in Plan Order)

Plan Order Reference

Volume: 1, District Wide

Part: Para 295

Respondent Number: 86 Comment Number: 1
Name: Organisation: Whitchurch Parish Council
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')
Does the respondent consider the document is sound?
If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):
Not Positively Prepared Not Justified Not Consistent Not Effective

The representation relates to: Volume 1 District Wide , Para 295

The Site Reference (if applicable) is:

Q4 Soundness Comment

The members of Whitchurch Parish Council do not agree with item 295. Page 123 of the draft Placemaking Plan, where it states 'At Whitchurch the need for and scope to identify safeguarded land will be considered as part of the Core Strategy review'

This is not acceptable, as land has already been removed from the Green Belt to accommodate 200 dwellings in the Core Strategy and therefore more development in Whitchurch Village within the Green Belt is not sustainable and will be detrimental to reason Green Belts are designated, to prevent urban sprawl by keeping land permanently open. We have not been consulted on this comment and disagree with it being included.

Q5 Change Requested

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

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Schedule of Not Duly Made comments received (in Plan Order)

Plan Order Reference

Volume: 1, District Wide

Part: Policy CP9

Respondent Number: 6426 Comment Number: 7
Name: Organisation: Persimmon Homes Severn Valley
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')
Does the respondent consider the document is sound? No
If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):
Not Positively Prepared Not Justified Not Consistent Not Effective

The representation relates to: Volume 1 District Wide , Policy CP9
The Site Reference (if applicable) is:

Q4 Soundness Comment

Policy CP9 - Affordable Housing

In reviewing the plan the Council will need to reconsider the wording of Policy CP9 to bring it in line with emerging Government Policy on affordable housing. This policy is contrary to National Policy.

Q5 Change Requested

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

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Schedule of Not Duly Made comments received (in Plan Order)

Plan Order Reference

Volume: 2, Bath

Part: Policy SB2

Respondent Number:	7152	Comment Number:	1
Name:	Organisation: SC Pulteney Road Ltd (Student Castle)		
Agent Name: James Taylor	Agent Organisation: Nathaniel Lichfield & Partners		
Further Information available in the original comment?	No	Attachments sent with the comment?	No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')

Does the respondent consider the document is sound? No

If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):

Not Positively Prepared

Not Justified

Not Consistent

Not Effective

The representation relates to: Volume 2 Bath, Policy SB2

The Site Reference (if applicable) is:

Q4 Soundness Comment

On behalf of our client, SC Pulteney Road Ltd (Student Castle), we are pleased to submit representations to the Bath and North East Somerset Draft Placemaking Plan (Pre-Submission Version).

In January 2015 we submitted representations on behalf of Student Castle to the Placemaking Plan Options document, relating mainly to the former St John's School site in Bath (which is in the ownership of Student Castle) and also policies associated with student accommodation in general. Since these representations a formal pre-application submission (15/00005/PADEV) has been made to the Council relating to the redevelopment of the former St. John's School site to provide c.190 student bedrooms and associated ancillary uses. Moreover public consultation has been ongoing, including meetings with local Members and key stakeholder. We held a public exhibition in November 2015, which provided information on the proposals to local residents and businesses, the submission of a planning application is anticipated in spring 2016.

Overall Student Castle consider that this emerging document appropriately recognises the important role which higher education plays within the City, the resultant need to plan for further student accommodation and the challenges in identifying appropriate locations for such accommodation.

The higher education (HE) sector is potentially facing a significant period of change due to deregulation, which will increase competition between Universities and other HE providers. Part of the emphasis of reform is a focus on improving the quality of the student experience, teaching being a major factor. With higher education institutions having to compete for students on a more competitive basis than ever before it could limit their ability to provide modern accommodation on-campus when having to focus on their teaching offer. There is a longstanding tension within many institutions as to whether they are a teaching body or a provider of accommodation; the reality is they are both but often struggle to fulfil both in equal measure at equal speed. In this context the Placemaking Plan must recognise that there is a significant role for PBSA in meeting accommodation needs off-campus which otherwise may go unmet through Bath's Universities and which could have a detrimental impact on the University's themselves, the contribution they make to the economy and a potential increase in HMOs. Flexibility within policy is key to respond to the future demands and trends which are reasonably foreseeable.

The redrawing of this area's boundary to exclude the former St John's School site is welcomed and is considered to represent a logical site allocation area in line with our earlier comments. The policy text associated with this allocation refers to the potential for parking to be provided in areas within or adjacent to the site. NLP's representations in January

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2015 addressed this issue and clarified that, whilst opportunities for parking on adjacent sites may be a possibility, this potential use should not be required through planning policy.

Q5 Change Requested

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

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Plan Order Reference

Volume: 2, Bath

Part: Policy B3a

Respondent Number: 4139 Comment Number: 2
Name: Susan Lockert Organisation:
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')
Does the respondent consider the document is sound?
If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):
Not Positively Prepared Not Justified Not Consistent Not Effective

The representation relates to: Volume 2 Bath , Policy B3a
The Site Reference (if applicable) is:

Q4 Soundness Comment

SULIS MANOR AND SOUTH STOKE CONSERVATION AREA

I think it essential to preserve the area around Southstoke Road and Midford Road. Therefore it would be better to provide vehicular access to the site from Combe Hay Lane.

Q5 Change Requested

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

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Q4 Soundness Comment

Please accept this message as a protest to the proposed destroying of the precious green land at Keynsham. This open space is for all to enjoy and should be left as such. There are other brown field sites which should be used first. The local infrastructure is full. This is evident by visiting the local car parks for such amenities as Supermarkets and the Train Station and finding no spaces at any time of day, any day of the week. A different thinking is needed for our future.

Q5 Change Requested

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

Respondent Number: 7081 Comment Number: 2
Name: David Vickery Organisation:
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')

Does the respondent consider the document is sound?

If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):

Not Positively Prepared Not Justified Not Consistent Not Effective

The representation relates to: Volume 3 Keynsham , Policy KE3a

The Site Reference (if applicable) is:

Q4 Soundness Comment

I strongly feel that the plan recently presented by Mactaggart & Mickel in my view has several very serious breaches of planning control; namely:-

Also there will be an adverse effect from the proposed plan on the established 'character' of the neighbourhood. Mactaggart & Mickel are legally obliged to take account of the local character and they do not do this at all in the current plan, The local character is that of the front of the houses opening onto green space, with the access roads at the rear of the properties.

The visual character and attractiveness of the area is that of the open aspect of the Avon Valley leading through to the Cotswolds and Kelston mount (the symbol of the local primary school). A great local view. The current proposed plan utterly destroys this local character and is unacceptable in terms of visual impact.

I am also very concerned about the impact on the traffic in the area and especially adding to the problems on the A4 together with the adverse effect on air quality from more traffic. BANES should promptly issue a "Stop Notice" to Mactaggart & Mickel with an accompanying "Enforcement notice" to ensure there is a 'cessation of activity' until all the legal aspects are dealt with to the satisfaction of the local community.

Q5 Change Requested

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

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Respondent Number: 7082 Comment Number: 1
Name: Peggy Nethercott Organisation:
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')
Does the respondent consider the document is sound?
If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):
Not Positively Prepared Not Justified Not Consisten Not Effective

The representation relates to: Volume 3 Keynsham , Policy KE3a
The Site Reference (if applicable) is:

Q4 Soundness Comment

In my view I feel the plan recently presented by Mactaggart & Mickel for the land to the east of Keynsham has several very serious breaches of planning control.

The current proposed plan does not take into account the 'character' of the neighbourhood which Mactaggart & Mickel are legally obliged to do. The 'visual impact' completely destroys the local character of open space and open aspect and is not acceptable.

The front of the local houses look out over green space and their access roads are at the rear of the properties. They were designed to take advantage of the open vista.

The volume of traffic generated, by the proposed plan, on to the already very busy A4 will cause complete congestion on a vital link road between Bath and Bristol.

We ask BANES to promptly issue a 'Stop Notice' to Mactaggart & Mickel with an accompanying 'Enforcement notice' to ensure there is a 'cessation of activity' until all the legal aspects are dealt with to the satisfaction of the local community.

Q5 Change Requested

Does the Respondent wish to participate at the Examination (ticked if yes)?
Why does the Respondent feel it is necessary to participate at the Examination?

Respondent Number: 7083 Comment Number: 1
Name: Alan Burston Organisation:
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')
Does the respondent consider the document is sound?
If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):
Not Positively Prepared Not Justified Not Consisten Not Effective

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The representation relates to: Volume 3 Keynsham , Policy KE3a

The Site Reference (if applicable) is:

Q4 Soundness Comment

I feel I must object to the possible loss of the green space to the east of Teviot Road. I have for many years used this space for walking our family dogs and enjoying the peace and quiet offered by this area. I would have thought after generations of local people having used this green space for enjoyment and exercise it would have been given a special status by you.

Q5 Change Requested

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

Respondent Number: 7084 Comment Number: 1
Name: Diane Tranter Organisation:
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')

Does the respondent consider the document is sound?

If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):

Not Positively Prepared Not Justified Not Consistent Not Effective

The representation relates to: Volume 3 Keynsham , Policy KE3a

The Site Reference (if applicable) is:

Q4 Soundness Comment

This email is regarding the plan for the development of the Breaches Gate area in East Keynsham recently presented by Mactaggart and Mickel. In my view there have been several breaches of planning control.

1. This area affords an open aspect giving views of the Avon Valley, the Cotswolds and Kelston Round Top. All this would be lost effecting the character and attractiveness of the area. It is unacceptable in terms of visual impact.
2. Mactaggart and Mickel are legally obliged to take account of the local character in that many houses open onto green spaces. Also there are no buildings in the local area of more than two floors. The local character has not been considered at all.

Air quality is always a concern wherever you live but with the increase in stationary/slow moving traffic on the A4 during the busy times mornings and evening, air quality is a major concern. There seems to be no plan in place to deal with any traffic increase.

Finally, I would request that Banes issue a Stop Notice to Mactaggart and Mickel to ensure there is a cessation of all activity. This should be accompanied by an Enforcement Notice. No work should start until all legal aspects are dealt with to the satisfaction of the local community.

Q5 Change Requested

Does the Respondent wish to participate at the Examination (ticked if yes)?

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Why does the Respondent feel it is necessary to participate at the Examination?

Respondent Number: 7085 Comment Number: 1
Name: M Hanks Organisation:
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')
Does the respondent consider the document is sound?
If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):
Not Positively Prepared Not Justified Not Consistent Not Effective

The representation relates to: Volume 3 Keynsham , Policy KE3a
The Site Reference (if applicable) is:

Q4 Soundness Comment

Whilst I fully appreciate that housing is required to cater for the UK's increasing population there is also a right and wrong place for houses to be built.

The Green Belt land at East Keynsham between Keynsham and Saltford is not a place suitable for development and by using a non-local construction company without any ties or knowledge of the area then it is plainly obvious that this is motivated by profit only.

As a local council BANES should be listening to the people they serve in the community. This area is Green Belt for a reason and it is disgusting of the BANES representatives to simply decide that they can take this away as and when they feel like it. What then is the point of having Green Belt areas?

Having read aspects of the plans submitted I wish to raise the point that this area to the east of Teviot Park is a local amenity area that cannot be built on due to it being for the use of all the local community of East Keynsham. So not only for the few houses that front onto the area but also for the wider community of East Keynsham. The legal precedent that must be considered here being residential amenity for the local community.

This area has character and has been like this for many years. By deciding that this area is no longer a Green Belt (hard to say it is not when you actually look at the colour, hardly brown is it) then this character is greatly effected in a huge negative way. The current plan does not take into this effect that the houses that front onto the land, with access roads to the rear, were purposely built in that manner. The developers and planners have obviously not taken this into account.

Development on this land will have a vast negative visual impact and attractiveness of the open aspect of the Avon Valley through to the Lansdown area, Kelston Mount and the Cotswolds. Do the developers realise that Kelston Mount is included on the symbol of the local primary school because of the view of it?

These current proposed plans completely destroys this existing local character and for the community is unacceptable in terms of visual impact.

As well as the above points surely it must be realised and deemed unworkable and utterly disastrous the effect the vast amount of extra volume of traffic this will have within the area, where roads are quite narrow, and onto the A4. The A4 Bath Road between Keynsham and Bath going through Saltford was not designed for and simply cannot take this extra volume. To vastly increase this volume at any time of the day can clearly be seen by any reasonable person to be a very bad idea but to do this at rush hour times, with the schools nearby meaning children's lives will be put at physical more risk as well as health risks due to the air quality obviously becoming worse, is something that the BANES representatives should not have dismissed, as they obviously have.

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This road infrastructure cannot take this increase. Also with climate change the taking away of these fields then the risk of flooding will greatly increase and will no doubt be seen in years to come.

Please may I urge BANES to consider the environment and the people they were elected to serve before profit and promptly issue a 'Stop Notice' to Mactaggart & Mickel along with an accompanying 'Enforcement Notice' to bring a 'cessation of activity' until all the legal aspects are dealt with to the satisfaction of the local community.

Q5 Change Requested

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

Respondent Number: 7086 Comment Number: 1
Name: Jeannette Cole Organisation:
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')

Does the respondent consider the document is sound?

If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):

Not Positively Prepared Not Justified Not Consistent Not Effective

The representation relates to: Volume 3 Keynsham , Policy KE3a

The Site Reference (if applicable) is:

Q4 Soundness Comment

I am writing to voice my concerns over the proposed development at Breaches Gate, Keynsham.

The area is a well used area by many different groups of people; families, dog walkers and is one of the very few areas of open space this side of Keynsham. It is an area that has been used this way for decades and is one of the only open areas this side of Keynsham. It is not only used by people in the immediate locality but I know someone who comes as far as from Whitchurch to walk dogs. If building is allowed there will be no open land left along the A4 between Bristol City Centre and Saltford and it imperative that we retain such a valuable open space so that current and future generations can continue to enjoy an open space in an very expanding town. This land has been well used as common land and to deny this in the future is out and out wrong. It is also habit for pheasant, owls and foxes in addition to a variety of birds and no double small mammals i.e. field mice etc.

I attended the developers consultation and have specific concerns about the proposals:

1) The issue of increased traffic really has not been addressed. I know the plan is to have traffic light controlled entry onto the A4. I suggest planners/developers undertake a study of the current A4 rush hour traffic. I drive to Bristol every day which takes 30-45 minutes if I leave before 6.50am in the morning. If I leave any later it takes considerable more time (worst case was a few months ago and it took 2 hours to drive 6 miles!). The rush hour lasts from 7am-9.15am and from 4pm-7pm leaving Bristol for the return trip. It is already difficult getting onto the A4 from the waitrose roundable and the A4 is queued from Saltford to Bristol and from before the waitrose roundabout going towards Bath. If another road joins this flow of traffic the traffic will completely grind to a halt with no-one being able to join at the roundabout as their will be no gaps in the traffic from the Bath direction.

2) At the consultation showing the suggested plans put together by Mactaggart and Mickel Homes none of the representatives could tell me where the existing hedgerow was on the plan, nor could they confirm if it was intended to

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keep the verge of land at the front of Teviot and retain the existing hedgerow in it's current position. Teviot and the surrounding estate was designed to have open greens between rows of houses. The road was built at the back of the houses so the front of the houses could enjoy open vista at the front and it is vital to the community feel to have a reasonable open area in the front and not have to buildings/gardens right up to the footpath. If there has to be a development on the fields it is important that this concept is continued throughout the new development to fit with the local character.

3) I do not believe sufficient thought has been given to the infrastructure. I understand that BANES have not made any stipulations with regard to the provision of doctors and dentists for the hundreds of additional people who will reside in the new development. Whilst there is a plan for a new junior school what plans are there for additional secondary education. Wellsway School is very popular with many students travelling from outside Keynsham to attend. The traffic both at the front and playing field entrance to the school is already a bottle neck at school start and finish times. Often it is single way due to parked cars and I have seen buses have difficulty navigating through the area. If emergency vehicles were required in the local area it is debatable whether they would also have free access.

As a final note I have to say that the whole consultation process from the beginning when the land changed zoning through to now has been poorly and underhandedly managed. It certain smacks of BANES only doing the barest minimum to comply with notification and consultation. They have tried to sweep these plans through hoping the locals would not notice was was going on. As I person who works full time the consultation times/locations have made it impossible for me to attend all but the M&M Homes consultation. In short it has been made as difficult as possible for me to hear first hand of the proposals and to voice my objections.

I would request BANES issue a "Stop Notice" to Mactaggart & Mickel with an accompanying "Enforcement notice" to ensure there is a 'cessation of activity' until all the legal aspects are dealt with to the satisfaction of the local community.

Q5 Change Requested

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

Respondent Number: 7087 Comment Number: 1
Name: David Briffett Organisation:
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')

Does the respondent consider the document is sound?

If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):

Not Positively Prepared Not Justified Not Consisten Not Effective

The representation relates to: Volume 3 Keynsham , Policy KE3a

The Site Reference (if applicable) is:

Q4 Soundness Comment

The local character of the area will be changed significantly if the development goes ahead.

3. The visual impact of the development would be to destroy what is currently a lovely open view towards Kelston Mount

4. The impact on traffic and air quality of all the extra vehicles exiting on to the A4 would be total detrimental.

Draft Placemaking Plan Consultation

Schedule of Not Duly Made comments received (in Plan Order)

Overall there is far too much development proposed and in motion for Keynsham and this is a step too far. If BANES has a need for more housing it should give consideration to other areas.

Q5 Change Requested

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

Respondent Number: 7088 Comment Number: 2
Name: Irene Pearce Organisation:
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')

Does the respondent consider the document is sound?

If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):

Not Positively Prepared Not Justified Not Consistent Not Effective

The representation relates to: Volume 3 Keynsham , Policy KE3a

The Site Reference (if applicable) is:

Q4 Soundness Comment

The current plan does not take into account the established character of the area. The houses look out over the green space and the access is at the rear. The current plan does not take this into account. The current plan will take the visual attractiveness and open aspect away.

I am worried about the impact of extra traffic. The pollution levels for the Rubens Close, Gaston Avenue area must be over the legal limit for traffic pollution without extra traffic being added to what we have to endure now. The noise levels are horrendous at times.

There will be too much loss of green space for both people and wildlife. Too many hedges will be lost which are important for the local wildlife. There will be a loss of public footpaths which have been established for many years. We are encouraged to walk in the countryside for our health and wellbeing, but the countryside will be eroded and there will not be anywhere for us to walk.

There does not seem to be any provision for homes for swifts in this development either. Please issue a Stop Notice to Mactaggart & Michel with an accompanying enforcement notice to ensure there is a cessation of all activity until all the legal aspects are dealt with to the satisfaction of the local community.

Q5 Change Requested

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

Draft Placemaking Plan Consultation

Schedule of Not Duly Made comments received (in Plan Order)

Respondent Number: 7089 Comment Number: 2
Name: Nicola Rodway Organisation:
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')
Does the respondent consider the document is sound?
If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):
Not Positively Prepared Not Justified Not Consistent Not Effective

The representation relates to: Volume 3 Keynsham , Policy KE3a

The Site Reference (if applicable) is:

Q4 Soundness Comment

I fail to see on the plans provided by Mactaggart and Mickel, where they have taken in to account and maintained the integrity of the local character.

One of the reasons for choosing to live in this area is because of the beauty of having green open space, which is iconic to locals and is synonymous to the local primary school. Currently the proposed plans do not take this in to account and is threatening to destroy an area of natural beauty and the character of the land.

The beautiful green open space is so much more than just a piece of land, it is where people congregate to walk their dogs, walk their children to school and back in a safe, tranquil and peaceful setting, have precious family time and observe the variety of wildlife and plant life which inhabit the area. As a sufferer of mental health, walking my dog daily across these fields and observing the changing seasons is far more beneficial than any medication, by removing this facility you are adding to the growing strain on the NHS by people who suffer from mental health, obesity, breathing and health issues. Traffic on the A4 is already a massive problem for commuters and with other developments ongoing in the local area, I cannot see how the main route linking Bristol to Bath is going to cope, not to mention increasing pollutants effecting the air quality.

I conclude by strongly appealing to BANES for the immediate issue of Stop Notice to Mactaggart and Mickel with an accompanying Enforcement notice to ensure there is a cessation of activity until the local community is satisfied that all legal aspects have been dealt with in accordance of meeting the community's needs.

Q5 Change Requested

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

Respondent Number: 7090 Comment Number: 1
Name: Nathan Moss Organisation:
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Draft Placemaking Plan Consultation

Schedule of Not Duly Made comments received (in Plan Order)

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')

Does the respondent consider the document is sound?

If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):

Not Positively Prepared

Not Justified

Not Consistent

Not Effective

The representation relates to: Volume 3 Keynsham , Policy KE3a

The Site Reference (if applicable) is:

Q4 Soundness Comment

The proposed plan is detrimental to the 'character' of the neighbourhood. The local character is that of the front of the houses opening onto green space, with the access roads at the rear of the properties. The plans presented are not in my opinion in keeping with this character. The visual character and attractiveness of the area is that of the open aspect of the Avon Valley leading through to the Cotswolds and Kelston mount. The current proposed plan utterly destroys this local character and is unacceptable in terms of visual impact.

I also believe that the proposals do not adequately address the significant infrastructure issues. Keynsham is at risk over being over developed, the Somerdale, K1 and K2 are already adding significant additional population to an infrastructure that is already at capacity. The local road network already cannot cope, the local train service is already at capacity, local schools are over subscribed, the local NHS services are not coping. The development does not take into account that the A4 is already grid locked from 7am; adding traffic lights is not addressing the issue.

BANES should promptly issue a "Stop Notice" to Mactaggart & Mickel with an accompanying "Enforcement notice" to ensure there is a 'cessation of activity' until all the legal aspects are dealt with to the satisfaction of the local community.

Q5 Change Requested

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

Respondent Number: 7091

Comment Number: 2

Name: John Leatherbarrow

Organisation:

Agent Name:

Agent Organisation:

Further Information available in the original comment? No

Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')

Does the respondent consider the document is sound?

If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):

Not Positively Prepared

Not Justified

Not Consistent

Not Effective

The representation relates to: Volume 3 Keynsham , Policy KE3a

The Site Reference (if applicable) is:

Q4 Soundness Comment

My second point is about the affect of the proposed plan on the established character of the neighbourhood - the local character is that the front of the houses open onto the open space with the access road at the rear of the properties. Mactaggart & Mickel are legally obliged to take account of the local character which in the current plan they do not.

Draft Placemaking Plan Consultation

Schedule of Not Duly Made comments received (in Plan Order)

My third point is that planning law describes as "visual impact". The visual character and attractiveness is that the open aspect of the Avon Valley between Bristol and Bath with Kelston Mount, Newlands and the area towards Newbridge. The current proposed plan will totally destroy the local character and is unacceptable in terms of visual impact.

My fourth point is regarding the NPPF 2012, the all important principle of development is that it should be sustainable. Without the extra 500-1000 houses the A4 at this point is already a very busy road and at gridlock conditions in the morning and evening, and also at various times during the day. Also, with the situation of no proper "ring road" from the end of the A471 and A4 will be horrendous as it is virtually gridlocked with the extra traffic that will be brought on to the new site. It will be hard to visualise exactly how we will be able to cope with the extra vehicles exiting and using the A4 at this juncture.

My fifth point - we the residents require action by Bath & North East Somerset local authority in accordance with the information the NPPF set out at paragraph 207 as follows - Effective enforcement is important as a means of maintaining public confidence in the planning system - local planning authorities should act proportionately in response to the suspect breaches of the planning control and should consider publishing a local enforcement plan to manage enforcement pro-actively, in a way that is appropriate to this specific area.

My sixth point is Bristol and Bath are two very beautiful cities and are such that they are built up areas all linked by green spaces where people can relax and in case you haven't realised this is the point I am trying to make that they wouldn't be like this if they were built up as you intend to build Keynsham up.

I along with my fellow residents want to see BANES acting urgently on the above suspected breaches of the planning control by issuing an immediate STOP NOTICE AND ENFORCEMENT ORDER to builders Mactaggart & Mickel.

I personally gave 9 years of my youth and 4 actual years serving in HM Forces to stop this sort of thing happening and consequently I moved to this area because of the attractiveness of it having lived most of my life in the North West in a concrete jungle and it would appear that you are trying to replicate this in the beautiful Avon Valley of which I have spent the last 10 years enjoying. Maybe if you had given the same as what I gave to the country in my youth you might be a little bit more constructive and considerate in your planning and development.

From a very disgruntled 90 year old resident who would like to see the rest of his life looking out at green space.

Q5 Change Requested

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

Respondent Number:	7092	Comment Number:	2
Name:	William Kerr	Organisation:	
Agent Name:		Agent Organisation:	
Further Information available in the original comment?	No	Attachments sent with the comment?	No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')

Does the respondent consider the document is sound?

If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):

Not Positively Prepared Not Justified Not Consisten Not Effective

Draft Placemaking Plan Consultation

Schedule of Not Duly Made comments received (in Plan Order)

The representation relates to: Volume 3 Keynsham , Policy KE3a

The Site Reference (if applicable) is:

Q4 Soundness Comment

The planned buildings are unsympathetic to their surroundings both in terms of visual impact and the general style of layout. There is no attempt to conform with the established layout format.

The A4 road between Saltford and Keynsham is already grossly overcrowded, and frequently at a standstill during the busiest parts of the day. The proposal will add in the region of one thousand extra vehicles per day to the mix with no apparent thought as to the consequences.

I would ask that a Stop Notice be issued to Mactaggart & Mickel with an accompanying Enforcement notice to ensure there is no commencement of construction activities until all the legal aspects are fully examined and all the outstanding dealt with to the satisfaction of the local community.

Q5 Change Requested

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

Respondent Number: 7093 Comment Number: 2
Name: Anne and Steve Asprey Organisation:
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')

Does the respondent consider the document is sound?

If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):

Not Positively Prepared Not Justified Not Consistent Not Effective

The representation relates to: Volume 3 Keynsham , Policy KE3a

The Site Reference (if applicable) is:

Q4 Soundness Comment

One thing that has made the area such an attractive place to live in is the open aspect with views right through to the Cotswolds and Kelston Top. The current proposals would destroy this. There seems to be a determination by BANES to destroy local character and encourage ribbon development all the way from Bristol to Bath, thereby creating huge traffic problems and pollution, as well as diminishing the Quality of life of all who live in the area. It is a great shame that we cannot rely on our locally elected representatives to protect us.

We therefore request BANES to promptly issue a stop notice to Mactaggart and Mickel with an accompanying Enforcement Notice to ensure that all activity ceases until all the legal aspects are met to the satisfaction of the local community.

Q5 Change Requested

Does the Respondent wish to participate at the Examination (ticked if yes)?

Draft Placemaking Plan Consultation

Schedule of Not Duly Made comments received (in Plan Order)

Why does the Respondent feel it is necessary to participate at the Examination?

Respondent Number: 7094 Comment Number: 1
Name: Jackie and Scott Greenland Organisation:
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')

Does the respondent consider the document is sound?

If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):

Not Positively Prepared Not Justified Not Consistent Not Effective

The representation relates to: Volume 3 Keynsham , Policy KE3a

The Site Reference (if applicable) is:

Q4 Soundness Comment

As residents and a family directly affected by the proposal, please understand and consider that it is upsetting enough to lose the beautiful view that we awaken to and live with everyday, but for us to lose the open space amenity directly behind the park (as you look from our front door outwards) locally known as Breaches Gate is devastating.

So many people from the surrounding area use this land to walk, not just dogs, but families as well. This is also a beautiful nature spot with lots of local wildlife. Birds, owls, pheasants, squirrels and even deer are around this area and near our houses.

We sincerely hope that that full consideration will be given to retain the current format and character of our local area with our houses opening on to green spaces (with roads and parking behind our homes) and most importantly of all that Breaches Gate remains as a community open space in your plans by opening it out onto Teviot Road Play Area. It would not put a divide between the new development and our existing housing, they could easily complement each other with a green beautiful open space between them (ie Breaches Gate) that has been a local amenity for generations.

You can make what is already a beautiful place to live an even lovelier one for an extended community by retaining our local character of housing. It is what makes our area a special place to live and we want it to remain that way.

With some forethought from you and by hearing and understanding the views of local people it can remain that way. I know we cannot do anything now to stop the build, but our home faces directly onto Breaches Gate and we do not want our view to be obstructed by a building, especially a high one, so perhaps by working together we can form a community that will be a unique and sympathetic to the existing surroundings.

Q5 Change Requested

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

Draft Placemaking Plan Consultation

Schedule of Not Duly Made comments received (in Plan Order)

Respondent Number: 7094 Comment Number: 1
Name: Jess Scott Organisation:
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')

Does the respondent consider the document is sound?

If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):

Not Positively Prepared Not Justified Not Consistent Not Effective

The representation relates to: Volume 3 Keynsham , Policy KE3a

The Site Reference (if applicable) is:

Q4 Soundness Comment

My name is Jess Scott and I am a resident of Bath Road, Keynsham. I am writing about my concerns over the proposed development to the land called 'Keynsham East' which is at present undeveloped. There was a meeting held by developers on Thursday 17th December from 4-7pm at the Keynsham Council offices above the library which caused numerous and substantial concerns for local residents. I would like these views to be put forward in opposition to the Placemaking Plans. If this is the wrong contact or I need to do this in another forum please advise me ASAP. I know views need to be given by Feb 3.

Concerns:

I have spoken with other residents on Bath Road and into Ellsbridge Close who are unanimously opposed to the development. We already live on a road that is heavily congested daily and development would bring further traffic and congestion. At 8.30 am and 3.30pm it takes 20 minutes minimum to travel the less than 1 mile to reach Keynsham High Street. The addition of 500 homes and 1000 cars will make this area a bottle neck much like Brislington currently is. The land is currently an area of natural beauty and a habitat for wildlife, my children can watch deer, rabbits and birds of prey from their bedroom windows and walk on the paths to the community woods whenever we choose. We do not need a visitors centre to help us access this as the develop suggested! Once these habitats are destroyed they are gone forever so development of these greenfield sites is short-sighted and ill-considered. The area is waterlogged and flooded at this time of year, id it sensible to build here? Also some of the houses on the Mac Mic plans are 3 storey town houses, how can this be in keeping with the local character of 1930s-1950s semi detached houses? The sky line will be crowded with these huge box houses. Many people, like us, chose to buy houses in this part of Keynsham and Saltford to ensure places for our children at Wellsway Secondary School. The addition of 500 houses in between will mean that our children will need to travel to Bath for a good school instead of walking the 1 mile to their local school I appreciate that BANES has, like all areas, a growing population needing housing however giving in to developers at the cost of our green field sites is ignoring the views of local residents and frankly destroying our environment. In view of climate change talks in Paris in December where it seems our global environment is now be a real agenda for most, even more so our local environment is imperative to protect. BANES must be more creative in finding solutions to identifying new sites for housing such as brown field sites.

Q5 Change Requested

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

Draft Placemaking Plan Consultation

Schedule of Not Duly Made comments received (in Plan Order)

Respondent Number: 7095 Comment Number: 1
Name: Mr Ian Walker Organisation:
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')
Does the respondent consider the document is sound?
If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):
Not Positively Prepared Not Justified Not Consisten Not Effective

The representation relates to: Volume 3 Keynsham , Policy KE3a
The Site Reference (if applicable) is:

Q4 Soundness Comment

Local people of east Keynsham have been using the valued open space known as "Breaches Gate" for decades. Considering the close proximity of the A4 Bath Road, Keynsham by-pass, a Nursery school, an Infants school, a Junior school, a Senior school, a Sixth Form college, A Science school, A Public Gym with resulting traffic air pollution, our precious green open space provides the vital "Lungs" for us and our children. BANES appear to have totally ignored this aspect as they ignored local opinions when planning their 'Civic Centre' in Keynsham at a cost of £39M I wonder how many of Banes councillors even know of or have visited the beautiful open space of Teviot Green / Breaches Gate?

If the proposed development of up to 1000 houses is 'fait accompli' then at least allow local residents a proper opportunity to be involved in major decisions relating to the visual, character and attractiveness to ensure that we retain the "English Green" concept in keeping with current trend.

Actions we request:

- (1) please conduct an Air Quality check BEFOREHAND and make public the results.
- (2) could BANES issue a "STOP" notice to Mactaggart, & Mickel to cease all planned activity on the site until all the legal aspects have been dealt with to the satisfaction and in agreement with the local community.

Q5 Change Requested

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

Respondent Number: 7096 Comment Number: 1
Name: Bob Elcome Organisation:
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')
Does the respondent consider the document is sound?
If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):
Not Positively Prepared Not Justified Not Consisten Not Effective

Draft Placemaking Plan Consultation

Schedule of Not Duly Made comments received (in Plan Order)

The representation relates to: Volume 3 Keynsham , Policy KE3a

The Site Reference (if applicable) is:

Q4 Soundness Comment

It was interesting to hear that you found traces of the Roman Road where it was suspected to remain, I'd be interested to know more about other findings. Is the survey in the public domain, or is there some other way to gain access?

Another area of concern is the question of habitat and ecology. One of the key placemaking principles says "Extensive green infrastructure is incorporated in the development, including allotments and enhancement of the river corridor, existing hedgerows and specimen trees are retained. The section on Site analysis with regard to ecology states that "Of higher ecological value are pockets of woodland, mature trees and linear features such as riparian habitat and hedgerows which are located throughout the site.

However, the actual map showing the "existing" ecology has several serious errors. The main one is the misrepresentation of the main field backing onto Minsmere as extensive woodland, whereas it is mainly an open field with just the thin strip of woodland adjoining the Manor road reserve. This appears to imply there is considerably more existing woodland, than actually exists. This is an interesting error, especially as it's not replicated in the site plan where the woodland is correctly depicted, but it does raise questions about the thoroughness of the ecological survey.

Linked to this, and incorrectly depicted on both the "current" and the "planned" maps, is the hedgerow separating the houses on Teviot road from the planned development. This does not appear on either the "current" ecology plot or the plans which have the housing coming right up to the edge of the green outside these houses. I don't know whether you are arguing that this is a modern structure and so does not count as "existing", but this is clearly not the case. Not only is it obvious from the height and depth of the hedge that it is well established, but it appears on at least the Ordnance Survey 1st Edition map of 1887. I think it's also present on the 1840 tithe map, but the version shown in the green belt documentation is too low resolution. In addition, not only does it clearly have a depth of history, but it is a key ecological element providing shelter for a wide variety of birds, plus a small family of squirrels.

Would it not be possible to use the riparian corridor to greater effect, allowing the field adjacent to the Teviot Road playground and park to be used as a village green and so keeping the planning ethos used when developing the existing houses in Teviot Road

It seems unfair that the plan takes account of the fact that the current landowner does not want development in certain areas. Why should the local community have to put up the loss of this amenity area and with a density of development in inappropriate areas simply for others' profit? The density of houses and the idea of having some three storey buildings is totally out of keeping with the current local character.

My final points concern the wider infrastructure. If this large area of land that used to be green belt is being lost to development there is need for more amenities to benefit the local population. A primary school and football pitch are all well and good, but where will the children go after that. What about provision for the elderly or very young; a surgery or some such, day-care and nursery?

However, this will only further increase my final, but by no means least serious point. There seems to be very little detailed thought with regard to dealing with the increased traffic on the A4. Unless this is carefully handled, Manor Road will become even more of a rat run than currently and will have traffic levels that are beyond what it can deal with. It is a narrow winding road with several blind bends with the potential for accidents.

There are also serious questions arising about sustainability particularly with regard to the air quality of East Keynsham. The Air Quality Action Plans for Keynsham and Saltford Consultation draft published in September 2015 shows that there are major emission issues on the A4 passing through Saltford. The additional traffic that would result from this development and the proposed solution can only lead to increased traffic stagnation, something already present on the A4 in the mornings and evenings.

Draft Placemaking Plan Consultation

Schedule of Not Duly Made comments received (in Plan Order)

All in all there seem to a number of questions initially regarding the viability of the development in general and then with specific aspects of the current plan

Q5 Change Requested

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

Draft Placemaking Plan Consultation

Schedule of Not Duly Made comments received (in Plan Order)

Plan Order Reference

Volume: 3, Keynsham

Part: Policy KE3b

Respondent Number: 5037 Comment Number: 1
Name: Clive Walker Organisation:
Agent Name: Agent Organisation:
Further Information available in the original comment? No Attachments sent with the comment? No

Does the respondent consider the document is legally compliant? (Tick if indicated 'yes')
Does the respondent consider the document is sound? No
If the respondent considers the Draft Placemaking Plan is unsound, is it because it is (ticked where indicated):
Not Positively Prepared Not Justified Not Consistent Not Effective

The representation relates to: Volume 3 Keynsham , Policy KE3b
The Site Reference (if applicable) is:

Q4 Soundness Comment

1-The initial proposal to remove keynsham east out of green belt was misleading to the public on the grounds that only 250 homes were proposed when in fact that the total is in fact 500 with KE3b taken into account.
2-KE2b was stated as safe guarded land the general public thought that this was safeguarded as greenbelt when in fact it was for building.if these 2 points were explained properly so that people understood there would have been more objections
3-The land in question is wetland / marshland and is a nateral soakaway with mash grass growing there where the water runs over the land it disappears down holes in the fields this indicates that there are underground water ways.
4-The additional run off from this development would cause additional problems along the river avon even with the proposals submitted especially after the problems experienced in the north
5-There has been no proposals as to the road access or traffic control along the notorious A4 road
6-There are already problems with high levels of pollutants in Keynsham exceeding recommendations which the other developments in the area this will only get worse
7-parking in the center is now a problem especially with the new council office staff parking in the town and no spaces left for visitors or shoppers.
Taking all these into account the area is totally unsuitable for development

Q5 Change Requested

Reinstated as green belt
no development until air quality is below recommendations
no development until traffic conditions improved

Does the Respondent wish to participate at the Examination (ticked if yes)?

Why does the Respondent feel it is necessary to participate at the Examination?

So that ordinary people who this affects can be heard and not just those with vested interests