

KEYNSHAM TOWN COUNCIL CONSULTATION RESPONSES TO  
BATH & NORTH EAST SOMERSET COUNCIL  
LOCAL PLAN (CORE STRATEGY AND PLACEMAKING PLAN) PARTIAL UPDATE

Consultation Document (Regulation 18 of the Town and Country (Local Plan)  
Regulations 2012 – January 2021

Date of consultation response submission 11<sup>th</sup> February 2021.

Consultation reference: DM1

Policy New Build – Net Zero Carbon Construction Policy – (Amending/updating/replacing Policy CP2 and SCR1 Residential Development.

Keynsham Town Council support both options. If or if not, the Future Homes Standard is implemented

Consultation reference: DM2

Policy New Build Non – Net Zero Carbon Construction Policy – (Amending/updating/replacing Policy CP2 and SCR1 Residential Development.

Keynsham Town Council support the proposed policy that would use an energy hierarchy to achieve zero carbon.

Consultation reference: DM3

Policy CP1 – Retrofitting Existing Buildings (Amendments to Policy CP1)

Keynsham Town Council support the proposed amendments to Policy CP1 and comment that option 2 is preferable specifically to reach the standards with a reasonable specified time.

Consultation reference: DM4

New Policy – Whole life Carbon Assessment

Keynsham Town Council support the proposed new Policy and comment that option 2 is preferable 'For all major development defined as 10 dwelling units or 1000m<sup>2</sup> or more of non-residential floor space'.

Furthermore, it recommended that measures are put in place wherein total square dwellings footage must be specified for all residential developments or developers will see a loophole, in the benefit of constructing nine very large dwellings (HMOs) which may result in a development equating to a size larger than a development with ten smaller dwellings which has become the case in Keynsham.

Consultation reference: DM5

Policy CP3 – Renewable Energy (Amendments to Policy CP3)

Keynsham Town Council support the amendment to this Policy.

Further comment – How do you know the electricity is going to be green (from a renewable source)?

**Consultation reference: DM6**

**Emerging Policy approach for harnessing wind energy (New Policy)**

Keynsham Town Council support this new Policy.

Comment: - Renewable energy is important especially wind generated power. This is a good source of power generation that can be used until other sources become more viable. Wind turbines need to be placed in localities to achieve best gain.

**Consultation reference: DM7**

**Emerging Policy approach for harnessing wind energy (New Policy)**

Keynsham Town Council support this new Policy.

**Consultation reference: DM8**

**New Policy – Electric Vehicles**

Keynsham Town Council support this new Policy.

Comment: Suggested addition to the Policy – That all new residential and commercial buildings with the provision of a car energy charging points should have a roofing design that incorporates PV systems to harness energy for charging.

Carport construction on developments with strip parking should have EV charging points powered by an on-site renewable energy source.

All charging points to be universal.

**Consultation reference: DM9**

**Policy NE3: Sites, Species and Habitats (Amendments to Policy NE3)**

Keynsham Town Council support the amendments in this Policy.

Comment: Consideration should be given in respect of developers just using fencing to border gardens, hedging should be the preferred option to encourage biodiversity.

Consultation reference: DM10

Policy NE5: Ecological Networks and Nature Recovery (Amendments to Policy NE3)

Keynsham Town Council support the amendments in this Policy.

Consultation reference: DM11

New Policy for Biodiversity Net Gain

Keynsham Town Council are of the opinion that this Policy is good in theory but how is this going to be enforced in the long term?

Consultation reference: DM12

Policy CP7 – Green Infrastructure (G) (Amendments to Policy CP7)

Keynsham Town Council support the amendments in this Policy.

Comment: - Why is it only the Bath river line and not extending along the river as it flows on through Keynsham?

Consultation reference: DM13

Policy NE1 – (Amendments to Policy NE1) – Artificial pitches.

Keynsham Town Council object in principle.

Sports such as football, rugby and hockey are being affected considerably in Keynsham, due to the effects of Climate Change. Grass pitches located in areas such as Somerdale and Bristol Road are regularly under surface water and are unusable. Sporting clubs are all ready having to look for alternative sites and options to be able to hold their matches, so this policy need to be reviewed further.

Comment: Artificial pitches must be of a material that is biodegradable, do not harm to the environment and can be safely recycled in long term. It is recommended that some research is undertaken into types of eco-friendly pitches that will be permitted in future sporting facilities, so that we do not lose some of our very historic sporting clubs or the opportunity of future sporting provision is lost.

Consultation reference: DM14

Policy PCS1: Pollution and Nuisance – Artificial pitches. (Policy amendments)

Keynsham Town Council support the amendments in this Policy.

Consultation reference: DM15

Policy PCS5: (Policy amendments)

Keynsham Town Council have concerns in respect to the Policy amendments and believes that this policy needs to be strengthened, as it is very vague and needs to a lot more specific remediation methods. There should be outline mitigations for the various development scenarios. The Policy needs to be more prescriptive for enforcement reasons. Developers will use and abuse this Policy.

Consultation reference: DM16

Policy LCR6 – New and replacement sports and recreational facilities. (Policy amendments)

Keynsham Town Council support the amendments in this Policy.

Consultation reference: DM17

Policy CP9 – Build to Rent Scheme. (Policy amendments)

Keynsham Town Council have concerns because the rent relief is calculated on the Bristol rate and not the Bath rate due to postcodes in the Keynsham area. The Policy needs to be clear in respect of this and some guidance needs to be given in respect of the rating system.

Consultation reference: DM18

Policy H2 – Houses in Multiple Occupation (HMO). (Policy amendments)

Keynsham Town Council support the amendments in this Policy.

Consultation reference: DM19

Policy H2 – Houses in Multiple Occupation (HMO). (Policy amendments)

Keynsham Town Council support the amendments in this Policy.

Consultation reference: DM20

Policy H2 – Policy H2A – Intensification of Existing Houses in Multiple Occupation (New Policy)

Keynsham Town Council support this new Policy.

Consultation reference: DM21

**Policy B5 – Policy B5 – Purpose Built Student Accommodation (PBSA) (New Policy)**

Keynsham Town Council support this new Policy.

Consultation reference: DM22

**Policy H2B – To restrict Purpose Built Student Accommodation to allocated sites (New Policy)**

Keynsham Town Council support this new Policy.

Consultation reference: DM23

**Policy H2B – Purpose Built Student Accommodation to allocated sites (New Policy)**

Keynsham Town Council support this new Policy.

Consultation reference: DM24

**Policy H2\* – Option 2 tracked changed update to policy H2\***

Keynsham Town Council support the tracked change update to Policy H2\*.

Consultation reference: DM25

**Policy H7 – Housing Accessibility**

Keynsham Town Council are of the opinion that this is very important policy and support the amendments.

Consultation reference: DM26

**Policy ED2A – Strategic (\*) and other Primary Industrial Estate**

Keynsham have strong views that it is important, that in respect of future new development the housing and industry mix must be carefully considered before any permission is granted. B2 should not be permitted adjoining housing developments. In respect of Keynsham north east and proposals for a garden suburb any industrial areas proposed should only be of A class (light and creative industry) and not B2 class.

Consultation reference: DM27

## Policy ED2B – Non-Strategic Industrial Premises

Keynsham comments that live/work environments will give flexibility, and these should be included in this Policy. Living above the shop/place of employment is more environmentally friendly.

Consultation reference: DM28

## Bath Spa University – Locksbrook Campus (new Policy)

No comment made on this.

Consultation reference: DM29

## Policy ST1 – Sustainable Travel Policy (amendment to Policy ST1)

The Ministry of Transport should be lobbied to change the legislation, in order to upgrade the specification for battery powered capacity on community buses to allow them to be within permitted limits to run community transport provision.

Currently, services like Keynsham and District Dial-A-Rides small community buses have batteries that are heavy and that with a full passenger load pushes them over the legal weight limit and hence they cannot be used in the provision of community transport services.

Consultation reference: DM30

## Policy ST2 – Sustainable Transport Route (amendment to Policy ST2)

Keynsham Town Council comment that multi modal corridors should be inclusive and not shared spaces for multiple types of transport. Electric bikes and scooters are not road legal, are not covered by insurance and are a hazard on shared paths.

Consultation reference: DM31

## Recreational Routes – Policy ST2A (policy amendment)

Keynsham Town Council support the Policy amendments.

Consultation reference: DM32

## Policy ST3 – Transport Infrastructure (policy amendment)

Keynsham Town Council comment that transport should be sustainable and fully universally accessible transport. Bikes and scooters are not the solution for disabled, elderly, and younger children.

Sustainable public transport with long contracts needs to be considered. Local industries need to support sustainable transport locally. More community involvement in decisions as to what is required.

Consultation reference: DM33

### Policy ST5 – Traffic Management Proposals (policy amendment)

Keynsham Town Council comments that this Policy does not hold water without support of the necessary road infrastructure to allow people around and through Keynsham. This Policy needs an equalities impact assessment being carried out in Keynsham. These ideals cannot be implemented until the correct infrastructure is in place. There should be no restrictions whatsoever for vehicular access into the centre of Keynsham which could affect access for many residents and businesses. The well being of communities needs to be considered.

We understand and accept the principle of the Policy, but it needs to be amended to state that any implementation will have to take place carefully, with a proper evaluation of the strategic and supporting road network, at each stage of the process.

Consultation reference: DM34

### Policy ST6 – Park & Ride (policy amendment)

Keynsham Town Council support the Policy amendments. Consideration of a small shuttle bus from the Hicks Gate Park & Ride into Keynsham. This could be self-sustaining for local employers.

The implementation of a shuttle from the Park & Ride will be a key factor in the future of Keynsham.

Consultation reference: DM35

### Policy ST7 – Transport requirements for Management Development (policy amendment)

Keynsham Town Council support the Policy amendments but wonder how practicable it is?

Consultation reference: DM36

### Policy GB2: Development on Green Belt Villages – (policy amendment)

Keynsham Town Council support option 1. Keynsham Town Council believe that there is a risk with option 2.

### Addressing Housing Supply – Policy KE2a

#### Keynsham Fire Station

Keynsham Town Council comment as follows that it is not believed that the site can accommodate 15 dwellings with the necessary parking provision and restrictive conditions of this site.

Any development of this site should be discussed and agreed between Keynsham Town Council, the NDP group and Bath planners.

## Treetops

Keynsham Town Council support in principle

## Land at north and east Keynsham (including Policy KE3b)

### Key opportunities and constraints

Keynsham Town Council would request that the following paragraph be added.

- Given the added pressure on the traffic on the A4 by the forthcoming transfer of recycling vehicles from the Midland Road recycling site and the likely increase in HGV traffic resulting from the KE3B development and the need to increase ecology of developed sites by 15%, it is the clear that development of Ke3 a and KE3b must be considered as part of the wider North Keynsham Strategic Development Location (SDL) to deliver a comprehensive mixed-use development including around 1,300 homes.

## Option 1 - Allocation of Safeguarded land

Replace - Option 1: Allocation of the Safeguarded Land

- If updated transport evidence concludes that there are deliverable measures to enable the allocation and delivery of the safeguarded land without prejudicing JLTP4 outcomes, then this could enable the allocation of the two areas of land currently safeguarded for development under Policy KE3b. This option would not entail a change to the Green Belt and would deliver around 300 dwellings during the plan period. The suitability and appropriateness of the wider area of north and east Keynsham for development would continue to be assessed through the West of England Spatial Development Strategy “

With proposed option 1

### Option 1

- It has been accepted that development of KE3 a and KE3 B cannot proceed without further infrastructure being completed prior to commencing any construction. Suggested proposals are a segregated cycle path from the development to Keynsham railway station and bus stops on the Keynsham bypass that are accessed from Station Road to enable new residents to have a frequent service to the High Street and the Railway Station. Given the need to increase ecology by 15%, a more realistic figure is 240 dwellings and the construction of a new nature reserve south of the A4.”

## Option 2 - Allocation of Safeguarded land and the wider site

Option 2 is not changed apart from noting that the need to increase ecology after the development will reduce the number of dwellings to 1300.

From Keynsham Council’s point of view Option 2 is to be preferred”.