



TOP SHEET

**B&NES Local Plan Options Consultation 12 February to 16 April 2024
Response from Keynsham Town Council (resolved by Keynsham Town Council on
15.04.2024)**

The attached responses to B&NES Council from Keynsham Town Council (KTC) are for the following Sections of the Local Plan Options Consultation: - Chapter & Section	Response from KTC
Chapter 6 "Keynsham, Saltford, Hicks Gate and Whitchurch Village (Area 2)" Section: Keynsham and Saltford: Area overview	Partially Object
Chapter 6 "Keynsham, Saltford, Hicks Gate and Whitchurch Village (Area 2)" Section: Keynsham and Saltford: Transport opportunities	Partially Object
Chapter 6 "Keynsham, Saltford, Hicks Gate and Whitchurch Village (Area 2)" Section: Keynsham and Saltford: Site options - Site Option: North Keynsham	Partially Support
Chapter 6 "Keynsham, Saltford, Hicks Gate and Whitchurch Village (Area 2)" Section: Keynsham and Saltford: Site options - Site Option: East of Avon Mill Lane	Strongly Support
Chapter 6 "Keynsham, Saltford, Hicks Gate and Whitchurch Village (Area 2)" Section: Keynsham and Saltford: Site options - Site Option: Central Keynsham Options A & B	Strongly Object to both Options A & B
Chapter 6 "Keynsham, Saltford, Hicks Gate and Whitchurch Village (Area 2)" Section: Keynsham and Saltford: Site options - Site Option: West of Keynsham Options A & B	Partially Support B & Strongly Object to A
Chapter 6 "Keynsham, Saltford, Hicks Gate and Whitchurch Village (Area 2)" Section: Keynsham and Saltford: Site options - Site Option: SE Keynsham	Partially Support
Chapter 6 "Keynsham, Saltford, Hicks Gate and Whitchurch Village (Area 2)" Section: Keynsham and Saltford: Site options - Site Option: Hicks Gate Options A & B	Prefer and Support Option A
Chapter 6 "Keynsham, Saltford, Hicks Gate and Whitchurch Village (Area 2)" Section: Keynsham and Saltford: Site options - Site Option: West Saltford	Partially Support
Chapter 6 "Keynsham, Saltford, Hicks Gate and Whitchurch Village (Area 2)" Section: Keynsham and Saltford: Site options - Site Option: South Saltford	Strongly Object

Chapter 6 “Keynsham, Saltford, Hicks Gate and Whitchurch Village (Area 2)” Section: Keynsham and Saltford: Site options - Site Option: SE Keynsham	Partially Support
Chapter 5 “Bath (Area 1)” Section: South of Burnett, next to A39 (potential site)	Object
Chapter 9: “Development management policy options” Section: Green Belt	(Option B)
Table 5.12 of SA for the Bath and North East Somerset LP	KTC Support Option 3: SM growth needs (lower reliance on GB release)

Statement to support KTC’s view on Option 3

It is noted that Saltford PC has carried out a landscape character assessment paper for Saltford’s Green Belt: “The Saltford Area of Great Landscape Value - Planning Policy and Character Appraisal by Saltford Parish Council (March 2024)”. This would be a non-statutory designation. Keynsham Town Council has made “a Keynsham Area of Great Landscape Value” submission too. Apart from the fact that the document seems to conflate green belt and landscape quality, a qualified landscape architect would conclude that the landscape surrounding Keynsham is of equal, if not greater, quality. This is not to say that either landscape is necessarily of ‘Great Landscape Value’, but that if one is worthy of designation then both would be.

Data detailing growth of Keynsham’s population growth.

"Between 1991-2021 Saltford’s population grew by just +53 (+1.3%) whilst Keynsham grew by +4372 (+28%).

Year. Keynsham population.

1951	8277
1961	15152
1991	15228
2001	15533
2011	15641
2021	19600

Most of Keynsham’s growth has been in post-2011. From 2011-2024 there have been an additional +2300 houses completed in Keynsham and several hundred more have planning permission to be built. The population is therefore around 20,400 which is an increase of more than 30% since 2011. This is a big increase: proportionately higher than the fastest growing city/ regions in the UK (Cambridge, Peterborough, Milton Keynes etc).

Chapter 6 “Keynsham, Saltford, Hicks Gate and Whitchurch Village (Area 2)”

Section: Keynsham and Saltford: Area overview

Response from Keynsham Town Council (resolved by KTC on 15.04.2024)

Do you support this approach?

Partially object.

Please say why and add any extra comments about this policy that you would like to make.

Keynsham Town Council requests that our Local Planning Authority seriously considers the requests of Saltford and Keynsham for landscape designation and their request to a “NE2a Landscape Setting of Settlements” designation, rather than AGLV. To accept this request would reflect the strongly held wishes of Keynsham’s local community and provide a more permanent protection of for part of Keynsham Green Belt much of which has already been removed from the Green Belt and developed. This land is essential for the health and wellbeing of residents and visitors and to protect and enhance nature.

The Town Council reminds B&NES Council that the December 2023 update of the NPPF was specifically intended to avoid removal of land from the Green Belt to meet housing need. The Secretary of State said in his official statement launching the NPPF, “the Government is ensuring it is clear there is generally no requirement on local authorities to review or alter Green Belt boundaries if this would be the only way to meet housing need.”

Furthermore, the Environment Act 2021 and its Environmental Principles Policy Statement (EPPS) from 1st November 2023 puts an even greater emphasis on protecting the natural environment in the NPPF. Yet this is not reflected in the options proposed. B&NES Council is apparently willing to surrender Green Belt land to development to meet housing need and not comply with the spirit and intent of the Government’s national planning and environmental policies under the NPPF (December 2023) and the Environment Act 2021.

The fundamental aim of Green Belt policy in the NPPF is “to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.” To remove land from the Green Belt for development in the Local Plan would represent a failure of trust by B&NES Council to the local communities adversely affected.

The NPPF (December 2023, Chapter 11) recognises that the availability of agricultural land for food production is a consideration in planning; likewise, the function of undeveloped land for food production is also recognised. 81% of Bath and NE Somerset is farmland (University of Sheffield data). Farmland requires the ecosystem support (e.g., habitat for pollinating insects) of surrounding undeveloped Green Belt and natural/semi-natural land to function. B&NES Council should acknowledge and promote the fact that Bath and NE Somerset does and can have an increasingly important role in the nation’s food production capacity and future food security, hence its Green Belt should be protected from development. This also support for local business opportunities in the region.

The economy cannot function without a healthy natural environment. The doughnut economic model which the basis of the Local Plan endorses the requirement in a climate emergency. It would be irresponsible to locate new developments on B&NES' natural/semi-natural land that underpins the economy of B&NES Council and the wider West of England area. It is patently not sustainable development to compromise our future food security by placing new developments in open countryside, green fields and Green Belt land. Food security and local food production by implication need to be key aspects of land use planning.

Can you suggest alternatives that you think we should consider?

Keynsham Town Council repeats and support the suggested alternatives proposed by Saltford Parish Council.

NEW SETTLEMENT

As recommended by NPPF (December 2023) at para. 74, these new settlements would provide a much more acceptable Local Plan if B&NES Council chose one or two big new site(s) where new infrastructure can follow "garden city" principles as recommended in NPPF (December 2023) at para. 74c. This would be designed and built on sustainable development principles with easy access to employment, leisure, health services and retail facilities as well as good public and road transport links to the larger cities, whilst limiting the need to travel as part of the overall design.

This would be much less harmful overall than the current approach by B&NES Council of the over- developing and ruining of existing settled communities by adding additional housing developments to meet housing targets that put such a strain on local services, congest local roads and remove the last remaining parcels of green space that are so important for residents' health and wellbeing and local wildlife habitat. The B&NES Council sustainability appraisal of February 2024 considers all the options put forward will increase the use of private cars and have a negative transport and environmental impact.

BATH & ELSEWHERE

The identified need for new housing going forward is in Bath not Keynsham or near outlying villages. If people are to walk and/or cycle to work new housebuilding should be where the jobs are.

The construction of so many student properties in Bath that are so far from their respective University campuses is not helping the situation. The student let market is in direct competition for development space and B&NES Council's declared commitment to build affordable housing within the city.

The predicted growth in jobs and need for new housing in Bath, is likely to be mainly in the academic, care, retail and hospitality sectors (as these are the main employers in Bath). The workers in these new roles are likely to be looking for affordable housing, which in turn will aid staff retention.

Due to the need for affordable housing provision in Bath, B&NES Council is strongly advised to follow the European model of encouraging and/or providing incentives for developers to convert existing buildings, including large terraced residential properties, and unused retail and commercial buildings to apartments for sale or rental. This might include the sympathetic conversion of some of Bath's Georgian buildings.

Potential brownfield sites in Bath and elsewhere (KTC recognises that B&NES Council has already identified some of these as potential sites for development): -

- The former WWII RAF base at Charmy Down: this 90ha brownfield site could be the perfect site of a Market Village along the lines of Poundbury.
- The former Print Press on the Lower Bristol Road, this site could easily incorporate retail with residential uses above.
- The remaining garage businesses along the Lower Bristol Road, whose sites sit within the original consented BWR OPA, there is no need for inner-city car sales outlets as the model for car ownership evolves.
- The Westmark site on the junction of the Windsor Bridge Road and the upper Bristol Road.
- The former (Hartwells) garage and car dealership across from Charmouth Road, on the Upper Bristol Road, which has been derelict for years.
- Derelict land at the end of Church Road in Bathford.
- The Council depot off Entry Hill, Bath, which has been under-used for years.
- Derelict land adjacent to the B&NES Recycling depot in Radstock.
- Swathes of disused former NCB buildings/land in Midsomer Norton (Station Road).
- Swathes of disused former NCB buildings/land in Radstock (land at the end of Tying Hill)

The report from CPRE "*State of Brownfield 2022*" on the state of brownfield in England found that local councils' registers of brownfield land show over 1.2 million homes (up from 1.05 million in 2018) could be built on 23,000 sites covering more than 27,000 hectares of previously developed land (compared to 21,500 sites on 26,250 ha in 2021). Just 45% of available housing units have been granted planning permission and 550,000 homes with planning permission are still awaiting development.

Most brownfield land still does not have a current planning permission. The minimum housing capacity on brownfield for the South West region is 71,452 homes with just 56% having received planning permission.

Notwithstanding this, many developers have consented schemes on brownfield sites, or options on brownfield sites, but are reluctant to progress these challenging/costly sites (other than creating the site access so that they are deemed to have commenced construction) whilst they can obtain consent on greenfield schemes.

Do you have any evidence or documentation that you would like to upload, to support your answer?

No

Name: Keynsham Town Council **Email:** Townclerk@Keynsham-tc.gov.uk

Chapter 6 “Keynsham, Saltford, Hicks Gate and Whitchurch Village (Area 2)”

Section: Keynsham and Saltford: Transport opportunities

Response from Keynsham Town Council (resolved by Keynsham Town Council on 15.04.2024)

Do you support this approach?

Partially Object

Please say why and add any extra comments about this policy that you would like to make.

The WECA initial options recently consulted on (upgrades to the A4 Bath to Bristol corridor, range of proposed “improvements” for active travel modes and bus services including a bus lane on the Keynsham bypass) have proved unrealistic, likely to make congestion worse and, Keynsham Council understands, have been withdrawn.

Can you suggest alternatives that you think we should consider?

No

Do you have any evidence or documentation that you would like to upload, to support your answer?

No.

Name: Keynsham Town Council **Email:** Townclerk@Keynsham-tc.gov.uk

Chapter 6 “Keynsham, Saltford, Hicks Gate and Whitchurch Village (Area 2)”

Section: Keynsham and Saltford: Site options

Site Option: North Keynsham

Response from Keynsham Town Council (resolved by Keynsham Town Council on 15.04.2024)

Do you support this approach?

Partially Support

Please say why and add any extra comments about this policy that you would like to make.

The really key issue is what to do about the proposal for **North Keynsham**, 1500 homes close to the town centre and railway station. There are significant downsides to this proposal (conservation, flooding, need for infrastructure). There are two best possible options which are to build nothing OR to do this properly and aim for 2000 homes, with much higher density and really good infrastructure, but then there would need to be a vast increase in infrastructure provision.

More widely:

Density of housing is an issue (see below).

There is too much discussion of Keynsham having good infrastructure. What matters is not the absolute quantum of infrastructure but the relative supply and demand.

There is a strong view that if infrastructure matters, then the Bath West site needs to be given much greater consideration.

The proposal for a completely new village between Keynsham and Marksbury really relies upon the transport provision (which is a WECA issue?).

Density

A fundamental weakness of the plan is the failure to discuss the density of housing. One of the key constraints is the requirement for the plan to deliver 14,500 additional homes over the twenty-year period, but the amount of land is expressed largely in terms of areas of land. The amount of land required for this housing measured in hectares is thus equal to $14,500 \div \text{density (houses/hectare)}$. It is shocking that the proposed areas for development do not have relevant information on this: without discussing density the Local Plan document has minimal credibility.

There is very significant scope for density to be increased and quantity of land to be reduced.

Both in continental Europe and within parts of the USA, many people live in high-quality mid-rise flats (n.b. although the USA has lots of land, the supply of land within city centres is, by definition, high scarce). The internal living space of such flats can easily exceed the living space provided within small two-bedroom or two-and-a-half-bedroom houses; the key point is that flats should be built to very high specifications (such as an appropriately up-dated Parker Morris

standard). Such flats are within buildings that are four-six stories tall (i.e. these are not high-rise buildings); the ground floor or an underground level can be used to store cars, etc, further minimising the quantity of land that needs to be paved over, releasing space for public play areas and nature. Blocks of flats can also be more efficient in terms of energy since the ratio of housing space to external wall is reduced.

Given the desperate need for more housing in the UK and the very limited supply of land BANES really needs to think about density of housing.

Student Accommodation

The plan seems to be very soft on the issue of student accommodation: the two universities say what they want and then we give it to them. If the universities want to expand then they should internalise the costs of doing so. We believe that BANES should refuse to plan for increased student accommodation. Universities' incentives (and universities' vice chancellors' incentives) have many perversities and local communities should not suffer from that.

North Keynsham

This is the major decision for Keynsham since it involves 1,500 homes. We believe that we should either aim for more houses than this or not build at all. Building more houses would require significant better infrastructure improvements than are proposed in the Local Plan (and significant better infrastructure improvements than BANES have been able to extract from developers in Keynsham hitherto).

This site is within the Green Belt and also the Cotswold National Landscape. So far as the latter is concerned, this should not be allowed to be an issue: Keynsham is distant from the Cotswolds and the area does not have high aesthetic value. The major conservation issue is that this land borders the River Avon, which is a significant wildlife corridor between Bath and Bristol. The National Planning Policy Framework (2021) .175 explicitly says that plans should "take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure". The Lawton Review of 2010 emphasised the importance of connections between green areas in order to maintain biological diversity to enable species and genes to move. Ecological networks need to be coherent and resilient to help wildlife cope with change: this was summarised by the phrase "bigger, better, more and joined up".

The issue of flooding is inadequately considered. For the last few years, the River Avon has flooded or characterised as being on "red" by the Environment Agency for much longer than hitherto. Most of the housing estate will only be 10 metres above sea level and future global warming and more variable weather could result in most of the area proposed for housing having significant flood risk. Any houses built in this area need to allow for much greater degrees of flooding (n.b. this might be because water management forces more water on this stretch of the river to reduce flood damage in Bristol or Bath). This would be a further reason for having five-six story properties here, with the ground floor not used for living space, but for car storage (and hence the costs of flooding would be much lower).

A major problem with this site is that poor infrastructure. The land is accessed by two small bridges under the railway and one small bridge over the railway. Any development would need to consider that increased use of the bridges under the railway would result in more bridge strikes and closures to the main railway line between Bristol and London. Keynsham already suffers from inadequate infrastructure: it is widely agreed that recent developments have been allowed to proceed without additional facilities being provided (demand vastly exceeds supply). We are not sure that that one road would be sufficient for this housing estate: that would imply a huge choke point and it would not facilitate people leaving to go to Hanham or Oldland Common. However, road access to the Avon Mill Lane area would need careful thought to prevent the estate becoming a rat run for people travelling from Hanham to the south of Bath.

Keynsham Town Council are very surprised that this proposal includes student accommodation, as the location is totally inappropriate.

The need for high-density housing and the lack of infrastructure work in opposite directions for this area of land: to obtain more housing the density should be increased, but this would require a larger increase in infrastructure than currently required.

There is also the issue of the river. Many recent housing developments have embraced being on the waterside (e.g. Hilperton at Trowbridge), but there are particular challenges from being on a river due to variation in water level. Currently there is a shortage of space within BANES for live-aboard boaters to moor, exacerbated by the Duchy of Cornwall recently enforcing its riparian rights more strongly. If this proposal goes ahead there needs to be careful thought about how the river is treated. The towpath is on the north bank, so there is no right of way. Unless this is addressed the whole estate will be devalued by having inadequate access to the river. Any marina will need good design with floating pontoons.

This development if it should go forward must have provision of affordable and social housing to meet the needs of the younger generation of Keynsham that are currently unable to buy homes in the town that they were born and raised in.

The option for potential development at West Salford will need to be considered in conjunction with this North Keynsham option, with regards to maintaining a significant green gap between Keynsham and Salford, which is a key priority for both settlements.

Can you suggest alternatives that you think we should consider?

No

Do you have any evidence or documentation that you would like to upload, to support your answer?

No.

Name: Keynsham Town Council **Email:** Townclerk@Keynsham-tc.gov.uk

Chapter 6 “Keynsham, Saltford, Hicks Gate and Whitchurch Village (Area 2)”

Section: Keynsham and Saltford: Site options

Site Option: East of Avon Mill Lane

Response from Keynsham Town Council (resolved by KTC on 15.04.2024)

Do you support this approach?

Partially Support

Please say why and add any extra comments about this policy that you would like to make.

This is 160 homes of infill on a brownfield site. The landowner may wish to use the land for commercial.

The East of Avon Mill Lane site is within easy walking distance of all central Keynsham facilities and is an ideal site for housing development and for affordable homes for young families.

If this site is selected B&NES Council should work closely with the current business to find alternative employment locations employment so that there is no loss of jobs.

The Avon Mill Lane site is suitable for housing, with the removal of the industrial processes from the site, with the land being next to the Keynsham conservation area, this will bring relief to the much-disturbed nearby residents and resolve potential enforcement issues that are often raised due to current site activities.

Avon Mill transport infrastructure would have to be drastically improved to cope with the extra traffic.

This option would make good use of land that is immediately next to the station and will mean that access to the High Street for bus connections and to the train station is relatively straightforward.

Can you suggest alternatives that you think we should consider?

No

Do you have any evidence or documentation that you would like to upload, to support your answer?

No.

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Chapter 6 “Keynsham, Saltford, Hicks Gate and Whitchurch Village (Area 2)”

Section: Keynsham and Saltford: Site options

Site Option: Central Keynsham

Response from Keynsham Town Council (resolved by KTC on 15.04.2024)

Do you support this approach?

Prefers neither option.

Strongly Objects to both.

Please say why and add any extra comments about this policy that you would like to make.

This proposal contains two parts: first, to demolish the supermarket and build a new one in the land adjacent; second to build houses on much of Keynsham’s town centre car parks.

Development in the town centre and Tesco site is a most unwelcome intrusion into the dynamics of the town centre that KTC has worked consistently to expand with success for a number of years.

The first proposal is absolutely unacceptable. It is totally incorrect to say that this is a development of brownfield land. The layout of the existing Tesco’s works well and switching the location of car park and supermarket would make access to deliver vehicles harder. Even if there were any long-run gains (which is highly doubtful), the disruption to Keynsham and the absence of a supermarket while the project went ahead would be disastrous.

The local plan mentions the “embodied carbon considerations relating to redevelopment of existing building” but ignores the carbon considerations and other costs of depriving Keynsham of a supermarket while the old one is being demolished and the new one is being built.

The second proposal is also high problematic. At peak times there is inadequate car-parking in Keynsham. Removal of these essential parts of Keynsham’s transport system should not be considered until replacement forms of transport have been proved to be durable and effective. Both of these ideas are totally unacceptable, and the supermarket proposal is particularly bad.

Converting Ashton Way car park into flats and repurposing the Tesco car park are not solutions to the existing traffic congestion. In fact, these proposals likely worsen the problem and create additional concerns for parking availability.

Keynsham Town Council do not agree that the car parks are under-utilised, and residents and businesses of our town would have the same opinion. To suggest that they are only 55% full is a poor manipulation of the data.

The removing the opportunity for residents to use their cars will only cause anger and frustration if there is no alternative means of transportation to get around the town. Once again, cycling is not the only answer. You cannot transport the weekly shop for a family on your bike or on a bus. The plan does not account for the aging population of Keynsham and the topography of the land (for ease of walkers as they get older). Users of town’s facilities (shops, the library and

recreational places) cannot be expected to arrive on foot or by bike especially those that live on the outskirts and neighbouring rural villages that rely on use of such facilities.

The scouts and users of the scout hut will require full and meaningful consultation on any change to the land over which they have a right of access.

Can you suggest alternatives that you think we should consider?

No

Do you have any evidence or documentation that you would like to upload, to support your answer?

No.

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Chapter 6 “Keynsham, Saltford, Hicks Gate and Whitchurch Village (Area 2)”

Section: Keynsham and Saltford: Site options

Site Option: West of Keynsham Options A & B

Response from Keynsham Town Council (resolved by KTC on 15.04.2024)

Do you support this approach?

Strongly Objects to Option A

Partially Supports Option B

This plot of land is problematic for environmental reasons because it squeezes the wildlife corridor along the valley from Queen Charlton to Stockwood Vale and thence to the River Avon corridor. The National Planning Policy Framework (2021) .175 explicitly says that plans should “take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure”. The Lawton Review of 2010 emphasised the importance of connections between green areas in order to maintain biological diversity to enable species and genes to move.

Site lies within area designated as part of the Landscape Setting of Settlement. The landscape setting of a settlement holds immense importance, and it is also an SNCI (Site of Nature Conservation Importance) buffer for protecting valuable habitats, conserving biodiversity, providing ecosystem services, supporting recreational activities, enhancing climate resilience and ensuring regulatory compliance. By safeguarding these areas and their buffers, we can maintain healthy ecosystems and secure the benefits they provide for both people and nature.

Ecological networks need to be coherent and resilient to help wildlife cope with change: this was summarised by the phrase “bigger, better, more and joined up”.

It also narrows the Green Belt separating Keynsham from Stockwood and thus violates a major principle that towns and villages should not be joined up but retain their independent character.

The loss of the Lays Farm industrial estate would be problematic: this provides useful services and removing it would require people to travel further for some things that are sold there.

There are major problems with infrastructure for this estate (apart from the overall lack of infrastructure for Keynsham as a whole). The only way into or out of this estate by car would be the Charlton Road, which is already heavily congested. The only way into or out of this estate by foot would be at either end. If pedestrians went south this would make the route into Keynsham very long; if pedestrians went north, then the path would be problematic (part goes through countryside, which would be dangerous in the dark).

Option B is a more sensible proposal would be to build on just part of this land. Since homes have to be built somewhere, this is one of the least-bad options. However, on the land proposed it should be possible to build more than 100 homes if density were increased.

Please say why and add any extra comments about this policy that you would like to make.

Can you suggest alternatives that you think we should consider?

No

Do you have any evidence or documentation that you would like to upload, to support your answer?

No.

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Chapter 6 “Keynsham, Saltford, Hicks Gate and Whitchurch Village (Area 2)”

Section: Keynsham and Saltford: Site options

Site Option: South East Keynsham

Response from Keynsham Town Council (resolved by KTC on 15.04.2024)

Do you support this approach?

Partially Supports

Please say why and add any extra comments about this policy that you would like to make.

Opportunities to link development into Manor Road Community Woodland Improvement Project work, including potential for expansion of the existing woodland to the east of the development parcel (noting potential constraint of gas pipeline in this location) are welcomed together with the opportunity for provision of local food growing. It is essential that there is a significant tree buffer required along eastern boundary of the site, to reduce impact of built development in views from the Cotswold National Landscape together with significant street tree planting required throughout development parcels, to reduce impact of development in views from the Cotswold National Landscape.

Gas pipeline between Keynsham and Saltford may restrict the types of Green Infrastructure that could be provided between the two settlements.

Currently this is a poor active travel route being a distance from Keynsham town centre. There would be significant walking times to nearest convenience shop on Chandag Road, and to the closest primary and secondary schools. Significant improvements to walking and cycling infrastructure would be required.

Currently there is no permeability between the site and the existing housing to the north, hence there would be the potential impact of creating an isolated development, severed from the existing town. Planning needs to be undertaken carefully, with input from the Town Council.

It is imperative that the proposed development complies with all relevant regulations and guidelines. KTC expect the developers to adhere strictly to planning policies, building codes, and any other statutory requirements to ensure the sustainability and safety of the development. Also, that developers do not renege on any development conditions.

Can you suggest alternatives that you think we should consider?

No

Do you have any evidence or documentation that you would like to upload, to support your answer?

No.

Name: Keynsham Town Council **Email:** Townclerk@Keynsham-tc.gov.uk

Chapter 6 “Keynsham, Saltford, Hicks Gate and Whitchurch Village (Area 2)”

Section: Keynsham and Saltford: Site options

Site Option: Hicks Gate Options A & B

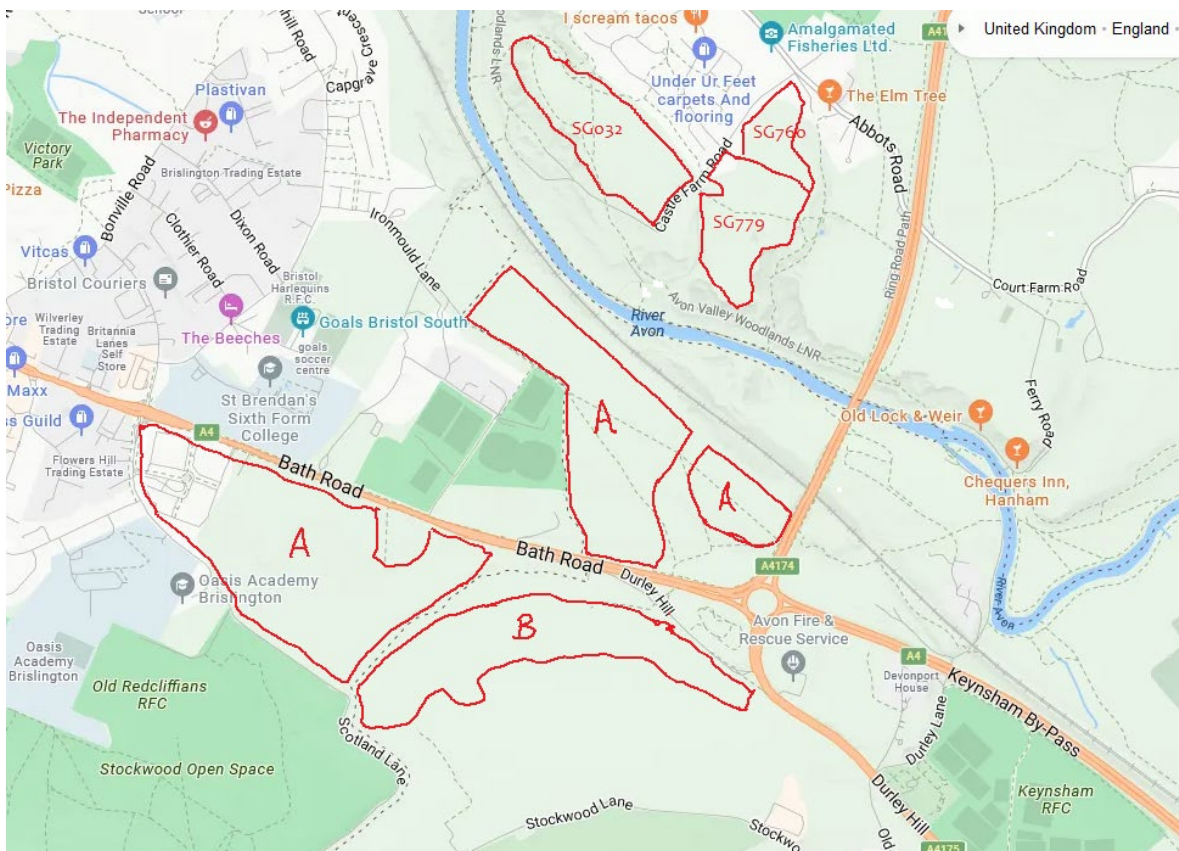
Response from Keynsham Town Council (resolved by KTC on 15.04.2024)

Do you support this approach?

Prefer and Support Option A with amendments to this option.

Please say why and add any extra comments about this policy that you would like to make.

There are two options (option B adds yet more housing to option A). The northernmost part of the proposal involves significant housing just south of the railway line, which at that point is very close to the River Avon. The River Avon is a significant wildlife corridor. No mention is made of the fact that the South Gloucestershire Local Plan proposes substantial building just north of the River Avon around Castle Farm Road and in “the Batch” (SG760, SG779 and SG032 in the map below). Either of these areas of building would be problematic for environmental/wildlife considerations (there is already a planning application for SG032); taken in conjunction they would very significantly damage the connectivity of this area which includes several nature reserves.



The area to the south of the A4 Bath Road also has problems. The area for proposed development includes the Park and Ride car park and there appears to be no provision for this to be fully replaced.

Such heavy development will be problematic for the A4. The only vehicular exit from the development north of the A4 will necessitate a junction that will cause delays as cars turn right to go to Bristol. The Stockwood Lane area is prone to flooding and there is a risk that the roads in this area will flood during periods of heavy rainfall (unless there is very significant investment in drainage).

The presumption seems to be that people in these developments will go to Keynsham (particularly children to School in Broadlands). The pedestrian access down the A4175 is a single pavement alongside a 40-mph road with a blind bend and a blind brow of the hill. There would need to be significant improvement to this road.

Hicks Gate can provide limited development as part of the plan for an integrated traffic hub with the move of the Brislington Park & Ride. Such development must not destroy the green zone that defines the Bristol/Keynsham communities. This is a very complicated site, particularly balance of transport and housing. B&NES are urged to be aware of the danger of merging Keynsham and Bristol.

Option A is a more acceptable option – it provides easy access to the A4 for residents and could be combined with industrial uses. However, the potential increase in traffic travelling to Bath and Bristol is concerning. It has the very real potential of being used more by Bristol residents than B&NES areas. Keynsham Town Council would encourage acquiring further information and analysis of potential traffic flow and funding patterns with Bristol before forming a definitive stance.

It is imperative that the proposed development complies with all relevant regulations and guidelines. KTC expect the developers to adhere strictly to planning policies, building codes, and any other statutory requirements to ensure the sustainability and safety of the development. Also, that developers do not renege on any development conditions.

Can you suggest alternatives that you think we should consider?

No

Do you have any evidence or documentation that you would like to upload, to support your answer?

No.

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Chapter 6 “Keynsham, Saltford, Hicks Gate and Whitchurch Village (Area 2)”

Section: Keynsham and Saltford: Site options

Site Option: West Saltford

Response from Keynsham Town Council (resolved by KTC on 15.04.2024)

Do you support this approach?

Partially Support.

Please say why and add any extra comments about this policy that you would like to make.

This could be developed in line with the Keynsham North development as long as facilities were provided for these communities.

The suggestion of building to the West of Saltford is partially supported, the ability to add a small amount of housing for this community with a proportion of social and/or affordable homes is vital for the younger generations that cannot afford to buy properties in either Keynsham or Saltford.

As the populations statistics show on page 2, there has been very limited development in Saltford and the inhabitants of a small site in this location would reap the benefit of having a local railway station (if this plan proceeds) in its village and hopefully improved transportation infrastructure on the A4 which would be a must. Also, with the improvements of sewage infrastructure at both the Keynsham and Saltford sewage sites would mean the community would be served with ease, in respect of waste water.

The suggestions of introducing a ‘quiet lane’ through Manor Rd would be welcomed.

Mitigation measures would need to include strengthening and enhancement of the remaining green infrastructure gap between Keynsham and Saltford.

Green Belt assessment required to assess impact of removing land from Green Belt, including cumulative impact when considering strategic removal across the district, and considering opportunities for enhancements to retained Green Belt land is important.

Exploration of extent of possible green infrastructure enhancements between Keynsham and Saltford required (noting constraint of gas pipeline in this location).

The option for potential development at West Saltford will need to be considered in conjunction with this North Keynsham option, with regards to maintaining a significant green gap between Keynsham and Saltford, which is a key priority for both settlements.

It is imperative that the proposed development complies with all relevant regulations and guidelines. KTC expect the developers to adhere strictly to planning policies, building codes, and any other statutory requirements to ensure the sustainability and safety of the development. Also, that developers do not renege on any development conditions.

Can you suggest alternatives that you think we should consider?

No

Do you have any evidence or documentation that you would like to upload, to support your answer?

No.

Name: Keynsham Town Council **Email:** Townclerk@Keynsham-tc.gov.uk

Chapter 6 “Keynsham, Saltford, Hicks Gate and Whitchurch Village (Area 2)”

Section: Keynsham and Saltford: Site options

Site Option: South Saltford

Response from Keynsham Town Council (resolved by KTC on 15.04.2024)

Do you support this approach?

Strongly Object

Please say why and add any extra comments about this policy that you would like to make.

Major housing developments in South Saltford must be opposed as unnecessary erosion of green areas in the Bristol - Bath corridor with ribbon development is not in the interest of resident wellbeing and our natural habitat. Concerns are raised in respect of the suggestion of encroachment on golf course. Loss of this green belt and leisure space is not welcome.

If this site was to go ahead then Manor Rd should become a quiet road and investigation to it becoming car free and limited to walking and cycling.

Can you suggest alternatives that you think we should consider?

No

Do you have any evidence or documentation that you would like to upload, to support your answer?

No.

Name: Keynsham Town Council **Email:** Townclerk@Keynsham-tc.gov.uk

Chapter 6 “Bath (Area 1)”

Section: Bath: Site options

Site Option: South of Burnett, next to A39

Response from Keynsham Town Council (resolved by KTC on 15.04.2024)

Do you support this approach?

Object

Please say why and add any extra comments about this policy that you would like to make.

The development of a new residential community in South Burnet is unwelcome in a green valley of agricultural land. The paucity of services and environmental destruction in this location makes it a totally in-appropriate location for development.

While the concept of a new village with modern infrastructure seems appealing, Keynsham Town Council have significant reservations. Building a new village in a remote location does not address the core traffic issue. Residents of this new village will still need to commute to Bath or Bristol, further straining Keynsham's already congested roads. It is an incomplete solution.

Without the provision of medical facilities (doctors/dentists), school and local amenities an additional burden would be place on Keynsham's existing and failing resources.

The proposed village location currently lacks existing infrastructure that would be essential, footpaths along many routes to provide safer walking routes into the closest town of Keynsham. Cycling infrastructure provision for this site would only meet the needs of the fittest residents of this community or those with electric bikes, due to the contours of the land and the hilliness of its nature cycling would only be an option for limited numbers.

Local bus connectivity needs looking at carefully as those without vehicles would be isolated. Current provision in this area is poor and irregular, offering a very limited service.

Keynsham Town Council requests that it be kept informed and consulted on work by B&NES Council if the Council further explores this potential location for longer-term development. Such a development should be designed and built on sustainable development principles with easy access to employment, leisure, health services and retail facilities as well as good public and road transport links to the larger cities, whilst limiting the need to travel as part of the overall design. Local recreational space (e.g. public park) for the new inhabitants and a biodiversity net gain should be factored in.

Can you suggest alternatives that you think we should consider?

No

Do you have any evidence or documentation that you would like to upload, to support your answer?

No.

Name: Keynsham Town Council **Email:** Townclerk@Keynsham-tc.gov.uk