

Comment

Many congratulations to all involved in development and preparation of the Draft Neighbourhood Plan. Fingers crossed for the formal consultation, external examination and referendum!

4.03 refers to residents aged between 21 and 40; and 4.04 refers to residents over the age of 65. There does not appear to be reference to meeting the needs of a middle-age group of people, ie. those currently aged 40-65, who will form part of the future ageing population. I feel it important to be inclusive of this group who have lived and raised a family within the community, who wish to enjoy living in the local community to older age but relocate (downsize) to a smaller more manageable property. As in the reference at 4.03 and 4.04 such residents would also benefit from availability of more 1-2-3 bedroom houses in the housing mix and their relocation would similarly free up larger housing for growing families.

4.24 states "...any new housing should be on 1-2 bedroom houses with a limited number of 3-bedroom houses." This reference should be fully represented on page 34 under the Draft Policies-Development Framework-Housing Policies at NP Policy2 (ii) - currently only 1-2 bedroom accommodation is referred to.

Section 10 – Policies.

- NP policy 2 (ii) – How will you do this? Does this policy allow you to review schemes for 3 bed units?
- NP Policy 4: The need for a Design Access Statement (DAS) has recently changed (2 weeks ago) . It is no longer mandatory for all planning application, only “major ones” (>10 units). However, he didn’t think that this was not a problem for us as we will still get applications to complete the questionnaire.
- NP Policy 5: The second half of this policy suggests that we would consider some development of woodland as long as there is no net loss i.e. a developer plants some trees. Is this what we want?

The following comments arise from the draft of the Neighbourhood Plan re Housing and which I hope the Management Committee will find helpful. For clarity’s sake I have followed the headings of the draft and their sequence in the Plan and have indicated a description of concerns, suggestions for resolution of these, and a rationale for each. Without prejudice to the other matters covered, two main areas are involved, one the more parochial matter of the future of Freshford Mill and secondly, and in my view of major significance to the residents of both parishes, particularly those who responded to the relevant section of the questionnaire, a need to define “Infill” in the envelopes.

Facts Section 4.03

Concern : that this statement could be challenged through lack of evidence.

Suggestion : omit “ Longer term the lack of younger families will threaten the viability of key local services “.

Rationale : there is no evidence provided to sustain the relationship between age demographics and decline in demand for these two quoted services. No benchmark has been established to start tracking age and shop usage, and the school’s catchment outside the community would probably mitigate or offset any reduction in numbers from within. These are not proven facts and unless evidence to support assumptions is available , it is better to omit this reference

as its removal does not diminishing the factual impact of this subsection. If the evidence exists then this concern is removed and the resulting proposal withdrawn.

4.06 - the recent advice by Cllr. Butters that demand for affordable housing is dropping may need to be examined in more depth to establish whether this would affect estimates for Freshford and whether a similar decline is being experienced in Wiltshire. This does not infer any change to this sub-section, as demand is obviously fluid.

4.07 - an apology is due here in respect of my former submission (24th. April) re this site when I maintained it had ceased to be "Brownfield". Cleo advised me at the 4th. July viewing that there is no relationship between the classification of Land (Brownfield or otherwise) and the usage classification. Freshford Mill is therefore a brownfield site with planning permission for residential usage.

Concern : the possible take out from the wording that planning permission was granted with support from the PC.

Suggestion : insert "against parish council and local Association opposition supported by strong resident and highways reservations" before "In 2009 planning permission was granted".

Rationale : If this is not included the inference could be that the planning permission was granted with support from the PC and the then Freshford community and that the potentially acute access problem did not receive Highways detailed comment. The reverse of the fact.

Projects 4.11

1st. Concern : possible problems with transparency.

Suggestion : omit third paragraph of this subsection.

Rationale : "Have raised questions" is unclear and the contact between presumably the Management Committee and "Potential developers" raises matters that need transparency and could be, and should not be, open to misinterpretation.

There is only one project arising from the Facts section. It seems remarkable that this matter should be the sole focus in project terms arising from the Neighbourhood Plan. This is a comment only, and no proposal for change is tendered.

2nd. Concern : Logic of layout.

Suggestion : that in layout terms Projects should be placed after Policy Objectives.

Rationale : Projects normally derive from both the Facts and the Objectives. This will, if actioned, result of course in renumbering of the sections.

Policy Objectives 4.24

Concern : that little emphasis has been given to policy re conversions.

Suggestion : add "This need may also be met partially by conversion of larger properties to multiple homes on the same or permitted enlargement of footprint, and with the same bedroom counts.

Rationale : Conversions add to the resolution of 4.23.

4.25

Concern : whilst Freshford Mill is a brownfield site and therefore its future on this basis merits comment in the Plan, further build on the site is inappropriate due to highways access concerns and other factors. Its mention as a “feasible site” for 4 to 6 homes of any description is highly debatable, although the distinction between “houses” at Rentokil and “homes” at the Mill is noted.

Suggestion : omit “and the Freshford Mill site” and insert “sites elsewhere in the designated envelopes” .

Rationale : there are envelope sites (See sections 4.26 and 3.22) which do not present the same negative development features as the Mill. A case for restricting development at Freshford Mill to that already approved is being submitted separately to the Management Committee. The opportunistic aspect of using this inappropriate, though brownfield, site for further build will be weighed against its negative features in environmental and infrastructure terms. Proposing further house build on the site negates Parish Council longterm policy as represented by many representations to the Local Authority in respect of applications for build ; and it reverses the outcome of efforts by the PC, the Freshford Mill Association and residents to minimise the impact of build and population increase on access to and from the site and of its openness in this very sensitive section of the Frome Valley.

You may wish to hold consideration of this until the comments specific to the Mill are in your hands.

4.26

Concern : this section can be interpreted as confusing affordable housing opportunities with those of market housing (“Other housing”) .

Suggestion : omit this section.

Rationale : There is no definition of “Infill” given in the Glossary. A major omission. Please refer to comments on NP Policy 3 below.

The argument, relevant to “Other housing” and heard expressed by residents who are not familiar with planning policy, that “all the residents in envelope land will not take up the opportunity to subdivide their gardens (curtilages)” is irrelevant. Planning Policy correctly does not consider the attitudes, aspirations or motivations of applicants, or what “they might be interested in” as material . Once a policy of removal of the restrictive element of the building effect on openness of the Green Belt is adopted, it allows for development subject to other material considerations and an application is weighed against all these.

The statement that all sites within the village envelopes are regarded as accessible and sustainable for affordable housing does not necessarily accord with infill limitations This statement could comprise a new sub heading provided the point re infill is included . Suggested wording : “All sites within the village envelopes are regarded as accessible and sustainable for affordable housing provided the envelope limitation re infill is observed . Please see comments on NP Policy 1 below , for the B&NES definition of infill – which I recommend, most emphatically, be applied to the Plan. This would counter major reservations about the extent of the land indicated on Map 2.

With the exception of affordable homes, the Green Belt generally washes over all other material considerations – but once included in an envelope (Or HDB) the key openness restriction does not apply as the envelope allows for build (Subject to weighing of other considerations including definition of “Infill”) which would not be allowed in the Green Belt where the openness consideration applies. The Green Belt has been most diligently and effectively interpreted and applied by B&NES and this has stopped the creeping development of the 1940’s to 70’s. In Limpley Stoke there has been no reduction in such protection of which I am aware, but the large areas designated for the northern envelope indicate a very considerable change (Subject to interpretation of “Infill”) in this respect. 4.26 as currently expressed obviously has to be seen in relation to NP Policy 3 and its Policy Objectives.

Draft Policies and Map 2.

Map 2.

Concern : the map key does not indicate the significance of areas left white on the map.

Suggestion : That the key be amended to indicate the significance of the white areas.

Rationale : The map key indicates grassland, local green space and woodland. It also indicates brown field sites and the two envelopes. To complete the key, the white areas also require key explanation. They vary considerably in current usage and it does not appear that intentions for them are covered in the draft..

NP Policy 1 :

Concern : this refers to Map 2. Without considerable limitations being applied, the amount of land designated on Map 2 is excessive and goes well beyond that required for the number of affordable homes proposed , and any market housing used to support the building of these homes. The draft plan gives no indication of the status of this land once the affordable homes target has been met.

Proposal (1) : that the interpretation of “Infill” applied by Bath and North East Somerset Council be adopted for this plan , and stated in the Glossary.

Rationale : as it stands, without such an interpretation, any application proposing development of an envelope site or sites would be most unlikely to fail (Particularly at appeal) if the proposal were to be for a site in an envelope , meet the limited number of bedrooms in one building stipulation , meet the requirements of the Village Design Statement and did not infringe , where applicable, the Conservation Area Character Appraisal. The concern arises from the lack of any explanation of “Infill”. Depending on the definition of “Infill” this could , over the period of the plan, represent a very substantial increase in build and resulting population of both parishes in which our community lives. This would create undesirable pressures on the road infrastructure, educational provision and could move the Freshford part of the community area towards a village reclassification (After the efforts of the PC and others to ensure that this would not happen). Also, the omission of a definition of “Infill” in the NP questionnaire was unfortunate, and may or may not have been assumed by responders. The B&NES definition, which I believe is still in force, is

“The filling of small gaps within the existing development e.g. the building of one or two houses on a small vacant plot in an otherwise extensively built up frontage. The plot will generally be surrounded on at least three sides by developed sites or roads”.

N.b. the underlining is mine to indicate that many properties and their curtilages shown on Map 2 do not meet these infill requirements. For example, “Small gaps” and the other criteria could scarcely be applied to a number of those areas designated on Map 2. Examples of such mapping are the inclusion of Abbotsleigh House, Abbotsleigh Cottage and The Hermitage in Sharpstone, or the properties along the A36. These examples are of course far from exclusive. I have no idea of the Wiltshire definition, but this might be worth establishing. I feel it worth mentioning that the above definition also would reduce substantially the amount of land which the map indicates as possible for development (Housing or otherwise) and this reduction would therefore accord with the limitations stipulated for Freshford as an RA3 category village in the draft B&NES core strategy, and R3 in the currently applicable Local Plan. Limpley Stoke is classed by Wilts. CC as a “Small village”.

Suggestion (2) : that the Map be amended to remove land that does not meet the above infill considerations.

Rationale : this will counter considerable concern, and possibly misinterpretations, by residents of the effect of the envelopes, and avoid any clash between the envelope recommendations and those of village classification by the Local Authorities.

NP Policy 3.

Concern : As per comment on 4.25.

Suggestion : Omit “and Freshford Mill”.

Rationale : As per 4.25. I suggest it not unreasonable to maintain that further development on the Mill site should be subject to heavy weighting of the opinions of those residents most affected by the outcomes of the current approved development and any increase in build in addition to that already approved.

It is arguably a weakness of the Joint Community concept, in respect of developments of particular sites featured in the NP, the effects of which impinge visually and environmentally only on the interests and opinions of those residents nearest to, or directly affected by such developments, that these opinions may be given the same weight as the opinions of those who are not. This means that the Neighbourhood Plan as stated in the draft could influence or override the deliberations of the relevant Parish Council when considering an application in respect of Freshford Mill, which influence would be unbalanced as the effects of development there is on Sharpstone residents and also in terms of local amenity, to other Freshford (and a few Hinton Charterhouse electors) and their families, but not to a large number of other members of the Freshford and Limpley Stoke community who live remote from the site. What is legal is not necessarily desirable.

As with section 4.25, you may wish to withhold deliberation on this aspect of the draft policy until the comments specific to the Mill site are made available. They will be forthcoming shortly.

General Points.

The suggestions above are responses to the request for input on the draft. The points made re the envelopes and definition of infill are in the light of the difficult situation that currently applies between particularly B&NES (And maybe less so with Wilts.) and the Core Strategy Inspectors re Housing, and concern that the Neighbourhood Plan should not open up the possibility of inappropriate housing development being imposed on the rural villages by major changes to the draft core strategies. Whether this is high risk or not is debatable, but certainly concerns me, and the timing of the presentation of the Plan to the inspector could create problems for our own and other rural communities in the light of the housing pressures. That is why the interpretation of the Envelopes is, I suggest, most sensitive, and underlines my suggestion re infill definition.

I have read through the draft with great interest and feel that you should be congratulated on the dedication that has gone into the work leading to the production of the draft presentation. The amount of effort that has gone into arriving at this stage, and will no doubt continue throughout the process, is impressive – and I can say that after 27 years of councillor experience and more than average exposure to Planning matters. It is this experience that has prompted the points made above for your consideration.

Just a thought regarding 5.23 - To design facilities and services for residents and visitors, meeting their needs without damaging the attractive natural environment.

Has anybody thought about the fact that neither of the villages has a public toilet. If the new hall is open seven days a week, all day, that would be convenient for Freshford residents and visitors.

With the hall site becoming the new hub and with more use of the Tynning would this not be the time to consider constructing a discreet little loo somewhere which would benefit the young and the not so young especially if the new hall will not be open 24/7?

I know in the past, and probably still is, the Doctor's Surgery has been a very convenient stop for the local Postie along with numerous lorry drivers, none of them being patients.

Just wonder if this has been considered.

Overall it is an impressive and well-presented document.

Clearly the contents of the document are condensed from the reports that individual groups have produced, and which are included as appendices. Although the appendices are referenced where appropriate I think it may be worth explicitly stating in the introduction that the document should be read in conjunction with the appendices to draw the reader's attention to them.

I think it would be useful to describe the difference between a project and a policy in the introduction.

Can the decision making process used to choose which projects to put forward be made more transparent? I happen to notice that the bridge over the river, which had support from 66% of the respondents is not included as a project, while the Church Field footpath with 57% support is included. Who has decided that the project with more support should be ignored in favour of one with less support, and why?

End of section 1.0. Is the extra 2 after the final 2012 meant to indicate a footnote (which I can't find) or is that a typo?

In section 7.1.5 the idea including transport information in the Welcome Pack for new residents is introduced, but I can't find any other references to Welcome Packs. Should the idea of a Welcome Pack be introduced properly in another section of the plan. Unless the Welcome Pack is actively produced, then the Transport group cannot implement their project.

Section 4.0.3: The document states that just over 10% of the population are aged 21-40. The census information for 2011 (taken from B&NES website for Freshford only) states that adults in the age range 25-44 is 17%. The discrepancy may be caused because the plan references a different age range to the census. Why is the age range in the plan different to the recorded age range in the census, and how has the conversion been made? Since I only looked at the census information for Freshford, it is possible that the Limpley Stoke figures skew the result, but to do so by such a large amount would be worth a comment if that were the case!

Section 4.0.3: Following on from the previous comment, the plan states 'Longer term, the lack of young families will threaten the viability of key services'. This seems to imply that young families are those with adults in the age range 21-40. However, the 2011 Freshford census records that 70 families out of 228 have dependent children (30%). Is the term 'young families' in the plan meant to mean 'young people', or 'families with young children', because that does make a difference on how these figures should be interpreted. If the number of young families is actually 30%, and not 10% as implied, then doesn't that change the choice of projects and policies? A value of 30% is not unusual, and nothing special needs to be done to address the problem.

Section 7.05/7.24: Why is the improvement of safety for pedestrians on the A36 a policy, and not a project? 7.12 puts forward a project to introduce 20MPH limits, so why don't pedestrian refuges and safety improvements on the A36 also deserve to be a project? The questionnaire showed 70% and 82% in favour of A36 improvements, so doing something concrete about it seems important.

Section 8.11: The cafe extension has been completed. Perhaps it should be recorded in section 8.0 as a fact, rather than being put in the section on future projects.

Many thanks for the opportunity to share thoughts.

1. Firstly this is a very convincing document that reads well and appears to promote a positive vision for the future. However, it is less clear how well substantiated the vision (2.1) actually is.
2. For example, the village design statement makes no mention to biodiversity (components or benefits) undermining the plans ability to deliver on sustainability or forward looking focus and potentially other key attributes such as vibrancy or a unique and cherished nature.
3. I would also question the weighting given to the individual working group interests or wider publics interests. The questionnaire supports this query in that favoured proposals don't always seem to win out. What's more, rumoured proposals such as the footbridge, the widening of the road between school and shop, additional car parking or field grabbing by the galleries shop appear to have been dropped. What is the process adopted to decide upon such things?
4. A lack of IMPACT ASSESSMENT
Proposals are made without any reference to impact assessment. A very good example is that of the the proposed footpath between Limpley Stoke and the Shop which would have a detrimental affect on the existing badger sets and the other biodiversity contained with the most habitat rich area of the field.
5. Is growth the primary driver for change? If so this challenges the desire to work within ecological limits. Section 4.3 illustrates the growth cycle perfectly. 2 bed houses have been converted to accommodate more families. Now the desire is to build more two beds. A village by its very nature is restricted in size else it becomes a town or a less desirable village. What is Freshford/limpley stoke hoping to become or remain?
6. Similarly, what. Is the definition of 'smaller younger families'? Does this really refer to 'professional couples'? If so, they are less likely to wish to live in this parish.
7. Should garden grabbing be encouraged?

Comments on the Freshford and Limpley Stoke Neighbourhood Plan.

A well presented and informative document on the makeup of Freshford and Limpley Stoke.

What is important is policies, and I assume that the many annexes have good status to influence future decision making.

I have two comments/observations.

Housing. There is considerable information (statistics and surveys) on smaller (affordable!) houses.

What I couldn't see is a reference to the benefits or constraints of the many rented properties and holiday rents, these being plentiful in Park Corner area, of

which many are small. The availability of these surely influences the availability of accommodation but impacts considerably on the social nature of the village. It provides needed accommodation, but encourages transient communities.

Environment and community. The area towards the A36 is geographically and conveniently close to Freshford. Many of its properties and environment come under the responsibility of Hinton parish who therefore have legal responsibility to decide its management and future. This is incompatible with the aims of the Freshford and Limpley Stoke Neighbourhood Plan. Surely we need a policy to realign the Parish boundary.

The Management Committee of Freshford Village Memorial Hall considered the draft NP at our meeting held last Monday. We agreed some proposed minor changes correcting titles, and providing supporting background information, and also revised and expanded wording to reflect the current position concerning the Hall redevelopment, taking into account the outcome of the feasibility study recently completed by Hewitt Studios. The committee believes that the latter would be most valuable in supporting the redevelopment project. The suggested changes are attached.

For your information, It was also pointed out at the meeting that should the suggestion by Gitte and Stephen Dawson that they might gift land adjacent to the playing field to the charity if the Hall redevelopment encroached on the playing field, this would require a change of use to be agreed by the planning authorities. To underwrite any such process, the Dawsons have been approached to see if they would be agreeable to suitable wording being added to the Neighbourhood Plan to cover the eventuality. Throughout replace "Freshford Memorial Hall" with its correct title of "Freshford Village Memorial Hall" (8.04 etc)
6.01 Amend to read " ... The Queen Elizabeth Playing Field is located behind the Freshford Village Memorial Hall."

New 6.06 "The Queen Elizabeth Playing Field, with the other land in which the Hall sits, was gifted to the Freshford Memorial Red Triangle Club (now The Freshford Village Memorial Hall charity) by local resident Hilda Alexandrina Thurstan in July 1950, and includes the enclosed childrens' playground and the playing field. It was formally opened on coronation day 1953." 7.16 Amend to read " ... reroute the footpath linking the school to the community shop, Village Memorial Hall and Queen Elizabeth Playing Field, avoiding the Hall Car Park, to improve safety for children."

Map 4 amend the proposed footpath to run to the east of the community shop (ie opposite side of the shop from the car park). Replace all "to the shop" with "to the shop, Village Memorial Hall and playing field. "

8.04 "The Freshford Village Memorial Hall and needs to be modernised and have additional capability added attuned to community needs now and in the future."

8.13 "An initiative is underway to modernise Freshford Village Memorial Hall. A feasibility study has been undertaken which has identified the potential for a

large main hall, with stage and servery from the adjacent kitchen, and supporting green room, toilets, storage etc. An upper floor at the recreational field end would include a small hall with external terrace. Separated from these by an airy atrium would be a range containing a self-contained annex for pre-school and similar usage, a committee room, and a youth space, plus potentially a relocated doctors' surgery. Additional income could be generated by a small-business hub, and gymnasium. With the vision of a "community wellness centre", space would also be available for treatment rooms for use by visiting practitioners. The package would meet modern building and sustainability standards, to provide low running costs, low maintenance requirements, and some on-site energy generation. Parking would be available for cycles and 32 cars."

9.22 "To retain local employment ... new local and artisan businesses. To encourage small enterprise support facilities, such as the proposed small-business hub in the Freshford Village Memorial Hall redevelopment."

We would like to make some representations on the draft Neighbourhood Plan. We live in Sharpstone.

We are very concerned about the apparent green light being given to so -called 'infill' in this area. One of the huge attractions of Sharpstone, both to residents and visitors, is the fact that it is largely unaffected by modern development and the openness of some areas gives it its character. If the NP says it's OK to build in these spaces, in time some of the beautiful gardens will be eaten into, if not by current residents by new purchasers/developers. Why put something in the NP that invites outsiders to come in and profit from inappropriate development? When the area has been protected for so long as an Area of Outstanding Natural Beauty, why now designate it for infill? And why has no definition of 'infill' been included in the Plan?

Secondly, when permission was given for 21 dwellings at Freshford Mill, this was deemed to be the absolute maximum number when taking into account the approach roads. An extra 6-8 houses would significantly increase the traffic, particularly on Rosemary Lane, which is so steep and narrow. It can already be hazardous to walk up and down with children and dogs, and getting in and out of drives can be difficult. There is true concern that the increase in traffic just with the 21 houses will be a problem; to have even more houses than this at the Mill is unthinkable. We don't understand why, having won the 'battle' over this against the planning authorities, we now have to battle again, this time with our fellow villagers who have put up this proposal.

Lastly, we urge the authors of the NP to think carefully about the potential urbanisation of Freshford and Sharpstone. The proposed new footpaths across fields, which we understand will be suitable for buggies, etc. will affect the rural atmosphere in a way that will never be recaptured. We sincerely hope that, if this idea goes ahead, tarmac is not used but some sort of softer and visually more acceptable surface is used instead.

Thank you for passing on these comments to the Management Committee. Please would you acknowledge receipt of this email.

Firstly, we would like to congratulate and thank all those involved in drawing up the plan, not an easy task and has obviously involved a lot of time and effort.

We are pleased to see the focus on preserving the rural environment we are so lucky to reside in, we are concerned about the level of light pollution and would welcome less street lights (and, if possible more elegant ones) As stated previously please do not allow creeping urbanisation and restricted pathways.

Our main comments/concerns are as follows:.

4.25 Freshford Mill

We are extremely concerned over the idea of allowing more housing on the Freshford Mill site. At the time of the original application there was strong opposition from the majority of the village to plans to develop this site with concerns ranging from increase in traffic, light and noise pollution to the urbanisation of a rural site. The Highways Authority also stated that the surrounding lanes could not cope with increased traffic flows. We feel it is a retrograde step to allow any further dwellings other than the 21 already planned. We would also welcome the inclusion of social housing within the 21 dwellings planned.

Village envelopes – housing infill

We understand the need for smaller properties but what would stop these being extended over time? Is there a way to stop these being used as holiday lets? Do we know how many properties in the village are actually empty or used as holiday lets at the moment? We would also be very concerned over the extra cars this would generate. Is one of the ideas to allow existing garages to be converted to houses? If so this would not only create more cars but the added problem of existing cars having to park on the road, in many parts of the villages this is already rather a nightmare! We would be interested in the definition of 'infilling' and would like to see a limit on how much would be allowed in any given area.

The Tyning – top end

What measures are being undertaken to ensure this is not used as a convenient 'car parking' area?

With increasing frequency, vehicles already park immediately on the junction of the High Street and Sharpstone Lane; for traffic turning right into Sharpstone on an already dangerous 'blind bend', the situation is further compounded given the necessity to commence the turn earlier than would otherwise be necessary to avoid parked vehicles, with commensurate loss of vision on the part of the driver, and also from drivers of vehicles approaching the corner from the High Street direction.

Section 7 – walking cycling and safer routes

We could not see any reference to safer access to and from Hinton Charterhouse although exploring opening the existing tunnel under the A36 was mentioned in the initial workshops. We would have thought this was an important route to

explore given that children from Hinton attend Freshford school, and Hinton Church is part of the united parish.

Path across Church Fields -we trust this will be unobtrusive and not replace the existing footpaths

1. Proposed new footpath across Church Stoke Tyning from Limpley Stoke Church to the rear of the Memorial Hall

The existing path has been in use for hundreds of years and is probably in the optimum position. Trying to make the surface an all-weather one is incompatible with farming the land (grass cutting will be impeded and will damage it whilst cattle will disrupt it as well). The proposed new route passes through a badger sett, which is unacceptable from the point of view of preserving biodiversity and will also be unreasonably steep at the Memorial Hall end. The alternative of routing a path round the larger perimeter would also have the disadvantage of prohibitively steep sections.

I think in conclusion that the gradients involved make easy passage across Church Stoke Tyning impractical for prams, pushchairs and the elderly, whilst those occupying the rest of the age spectrum are well able to negotiate the existing path at any time of year wearing appropriate clothing. The plan to construct a new path surely has too many practical disadvantages to be worthwhile considering.

2. Proposed purchase of The Tyning and construction of footpath and parking areas within it

The Tyning is a historical icon of Freshford with a significance equivalent to that of its church. This was appreciated when it was originally given to the village for the enjoyment of the community and later when the land was purchased by a group of villagers to prevent its fate being determined by a single interest group. The idea of making it a Village Green was to preserve this status. It seems to me that land given for the enjoyment of the villagers of Freshford was not given for the convenience of the school or any other body. Certainly the spirit of the gift did not include giving part of it over to exclusive use by the school or to irreversible development to provide parking and pathways. By purchasing the land, the Parish Council takes the considerable responsibility of respecting the spirit of the original gift and determining accurately and in detail the wishes of the community with regard to its use. Proper and open discussion could undoubtedly arrive at some acceptable compromises, but the "Making Progress" questionnaire was woefully inadequate in this respect. To attract my support for the Village Plan, the Parish Council has to lay out clearly in writing its plans, its legal position, and the aspirations of BANES, with respect to The Tyning and its future use. I believe our Parish Council is capable of recognising this responsibility and will, I hope, act accordingly before we have to vote on the fate of its overall plan.

We have been living in Pipehouse (at Farfields for 21 years and then Turnip Wood for 10 years) for a total of 31 years.

It is reassuring to see that the plan recognises the “unique rural character” of the hamlets including Pipehouse that surround the villages of Freshford and Limpley Stoke.

It is also noted that they are “separated by green fields and woodlands” and included in the Cotswolds Area of Outstanding Natural Beauty.

In view of this we were somewhat alarmed to see that the Rentokil Brownfield Site seems to have been identified by the Parish Council (without any consultation with the residents of Pipehouse to our knowledge) as a feasible site for new housing possibly including affordable housing. It is interesting to note that the Parish Council has not identified any feasible site within the villages of Freshford or Limpley Stoke? We note for instance that the relocation of the doctors surgery would free up space which might be used for the expansion of Freshford School. Why does the school have to expand? Surely many of the problems the village is suffering with excess traffic and congestion is caused by those that use the school. Many of whom do not reside in either Village! Wouldn't it be better to use the site for housing for elderly residents or indeed affordable housing. It is a prime site right in the centre of the village and should be ideal for this purpose.

We would like to register our interest and concern at this stage, and respectfully request that any further developments relating specifically to the development of the Rentokil site should involve full consultation with the residents of Pipehouse. It seems to us that the Neighbourhood Plan then goes on to identify several factors deemed a necessity for future and present Residents that would make the Rentokil site wholly unsuitable for development.

However, we note that “proposals for new development must take proper account of relevant planning considerations raised by immediate neighbours or by the community through their Parish Councils through comprehensive local engagement”. We also note that “any housing development will need to be justified in terms of its positive benefits to the character of, and community benefit to, the villages”. It would be interesting to see how the Parish Council thinks that development of the Rentokil site will benefit the local community of Pipehouse in a positive way.

The A36 trunk road is mentioned in 7.05 “ which divides the community and acts as a barrier for residents in Pipehouse to access key services”. With respect, it is exactly this road that

separates our hamlet and makes it unique. I am sure that residents of Pipehouse value this divide and whilst we can only speak for ourselves we have never seen the road as a barrier to using local services. We have used all the local services available for over 30 years and cannot recall an occasion when we were prevented from doing so by the A36. With the possible exception of bad weather but that is to be expected when one lives in a rural community. In that time there have not been any serious accidents to our knowledge. Therefore we do

not feel that our safety needs to be improved by any of the measures mentioned in 7.24.

I live at Laurel House in Station Road. I have followed and considered the consultation and will shortly submit my comments on the architectural statement in the Draft Document.

Meanwhile may I suggest that in view of its length and complexity you issue with the consultative document a summary of proposed changes from existing established Policy. Brief reasons would be useful and could be given alongside each change.

This would enable us all to more fully understand the issues and comment more sensibly. Map 2 of the Draft Plan shows various village envelopes. I understand from Nick Stevens and from a Bath planning officer working on the Plan that these enlargements to the current Settlement Areas could make areas of the village, which are currently protected, more likely to be built on. I have spoken to a number of residents about this and none has been aware of this proposed change. Residents need to understand the issues before they vote on the Plan. The Plan is currently not clear on this matter and does not show the existing Policy Map nor explain the implications of any changes. This is an important issue since Freshford has retained a rare beauty because development has been very carefully controlled. I believe that most if not all residents would oppose any loosening of current controls.

I am writing this very briefly as I am about to head off on holiday and had been meaning to respond earlier but didn't manage to.

I can see that a lot of thought and effort has gone into the plans with many potential benefits to the community and I do appreciate that. The areas that raised concern for me were firstly housing development - which I'm sure will be an ongoing process to ensure that it is sensitive to people's needs and to the existing qualities of the villages. Secondly the proposed new path - I am concerned that diverting the path may disturb the badger sets at the top of the field and also that it may be an urbanising feature as opposed to the qualities of being a walk across a field. And lastly the image of a proposed new village hall in the Parish bulletin was nothing short of hideous and I cannot see how it bears any relationship to the surrounding architecture. I am not anti modern design but I would be extremely sad to see that proposed design come to realisation in Freshford.

Firstly, my congratulations on this superb document and to all those who have worked so hard to produce it. The Plan has brought together the views and aspirations of both Freshford and Limpley Stoke residents and outlined a very strong approach for the future of the two villages.

The Freshford and Hinton Charterhouse parish boundary dissects our home and although we are classed technically as Hinton residents, as the larger part of our property is in Hinton, my husband and I have totally identified with Freshford as our village since we moved here in 1980. I served as a parish councillor in Freshford for 20 years and was Chairman for over 4 years. So my comments

below are based on both my identification with this special place, as well as knowledge built up over my years as parish councillor.

My major concerns with the proposals are those relating to development and planning.

This Plan proposes a dramatic change to the areas where development can be permitted in the parish of Freshford. Historically, the Housing Development Boundary (HDB) only encompassed the major part of the built up area in the village area around the Church. The settlements of Sharpstone, Park Corner, Pipehouse and part of Midford Lane were outside the HDB and the presumption was against development, unless very specific special circumstances were proven.

The provision of Affordable Housing has been fully adopted by Freshford PC and to be provided does not require any change in settlement boundaries– just a willing landowner prepared to sell and the land conforming with the planning laws associated with this special case.

I acknowledge that the proposals to open up new areas to development within the Parish Boundaries would provide for some additional open market housing. The objective stated within the Plan (4.24) is that these should be 1-2 bedroomed houses, with a limited number of 3 bedroomed houses and that the need is to encourage younger families into the village and downsizing by older residents (4.23). However I question the following:

1. The existing HDB delineates a fairly densely populated area, of mostly older properties, a significant proportion of these being listed and mostly being located in the Conservation area. So any new development within this area has had to conform to very strict Planning guidelines. The properties are closely packed with smallish gardens, except for some of the major homes, such as Freshford Manor or The Old House, both of which had their gardens listed of being of Local Historic Interest.
2. The proposed new settlement envelopes, apart from parts of Sharpstone and Rosemary Lane, are in areas where the housing is more spread out with larger gardens and fewer listed buildings; the major part of the new settlement envelopes are not in Conservation areas. The way that the boundaries of these new envelopes have been drawn has included small paddocks and pockets of land owned by residents, some of which historically came with the purchase of the property or have been bought by residents as local landowners have sold off agricultural land.
3. Freshford is a very sought after village. The amenities in the village of excellent transport links with the Railway station, school, shop and village hall together with very attractive housing and wonderful countryside result in achieved housing prices comparatively higher than other local villages or towns. Any developer sensing an opportunity to purchase land in Freshford will be very attracted to the high prices which could be obtained. Once land is released in these envelopes, even though the Plan states that the objective is two and three bedroomed houses, a developer will see the opportunity for larger properties. It

is interesting to note the development in Norton St Philip on the site of the old chicken factory where 54 open market houses are being built together with 6 affordable rented properties and 2 affordable shared ownership houses. The 54 open market houses are mostly 4 or 5 bedroom homes. So far only the terraced houses have been released for sale but current prices range from £695K to £950K. Detached four and five bedroom homes for later release have guide prices of £1 to £1.5 million. There are no open market homes of the type stated in the Freshford and Limpley Stoke Neighbourhood Plan, presumably because the developer can see there is a far bigger profit in top end housing and this will surely be the situation for any development in Freshford. Once land is designated for development under this Neighbourhood Plan, it will be exceedingly difficult to find any cogent planning arguments to counter a developer proposing larger and more expensive houses.

4. The provision in the Plan for these new settlement envelopes to provide additional open market housing in Freshford is not based on any survey apart from the loosely worded question in the original questionnaire – question A3 ‘ To limit any development to within or adjacent to the existing built area and to brownfield sites (Rentokill and Freshford Mill) provided the development meets with strict environmental and development guidelines (ie respects the existing character and form of the villages). Like all the questions, it was for both villages and unlike Freshford, Limpley Stoke had no historic HDB. My view would be that the majority of Freshford residents are not fully aware of the implications of this proposed major change to where new housing can now be built in Freshford. These new housing envelopes were not highlighted to residents throughout the period of discussions on the Plan and when I raised the question of a definition of the question A3 at the annual Freshford Parish meeting earlier this year, to determine if additional market housing would be designated in areas other than adjacent to the HDB, the answer was that this was an option being discussed. Such a major change should surely be a matter for further discussion at an open Parish meeting with the full background to the reasons for this proposal being debated, prior to it being adopted as Policy in the final copy of the Plan.

5. Section 4.3 states the need for 2 and 3 bedroomed houses is partly to encourage downsizing by older residents. There has been no survey conducted to research this, apart from the question in the original questionnaire. The only question posed was ‘ To make adequate provision for our local residents (especially young families and elderly residents)....’ There was a majority in favour of this question but this is hardly the basis on which to base a policy change, especially as the questionnaire was only filled in by just over 50% of the parishioners. From my limited knowledge of recent years in Freshford, most elderly residents have preferred to stay in their own homes and not move to smaller properties, even though a number of smaller homes for sale have been available in the village or they have moved to Bradford, which offers more facilities or to Avon Park.

6. There are no firm guidelines given for the number of open market properties to be provided within the envelopes – surely there needs to be some limit to prevent on-going development?

7. The new envelopes open up several parcels of land along the A36 and down the main lanes leading to the village – Pipehouse Lane, Ashes Lane and Church Lane. This green land (and Mills Landscape business is essentially green land)

could be linked together and will be very easy to develop and therefore lend itself very quickly to much larger development than is envisaged in the Policy objectives.

8. It is interesting to note that with no B&NES Core strategy in place and only the NPPF leading planning policy, there is considerable concern by various groups in Bath, namely the Bath Preservation Trust and the CPRE, amongst others, as to how the provision of new housing will be met. There is huge protest against the 300 homes planned for the Southstoke plateau. The adoption of the Freshford and Limpley Stoke Neighbourhood Plan could easily create a very solid planning basis for developers to argue the case for major development in our two villages. Not only does the plan open up new areas for development, the argument of sustainability is very easy indeed to argue for Freshford. The current B&NES planning team working on the new Core strategy invited comments from Freshford PC to form the basis for their categorization of status for Freshford, because sustainability is such a big issue. Their view after discussion and viewing the geography and topography was that Freshford should remain a RA3 village and not be reclassified as a RA1 village – but any developer could very easily argue otherwise based on the amenities of the village, particularly as there is no B&NES Core strategy yet in place.

So as a conclusion to these points, I ask that the boundaries of these envelopes are considered again and that paddocks and areas of grassland attached to properties in these envelopes are excluded. I would also ask that the Mills land is excluded from the envelopes. If these areas of grassland are not excluded from the envelopes, I believe we could find that Freshford will see much larger future development than is either needed or wanted. It could also further open up to development those areas of grassland within the envelopes which have also been purchased by residents and form part of the curtilages of their properties – namely all the land between Ashes Lane and Pipehouse Lane and part of the grassland area in Sharpstone.

Crest Development recently bought agricultural land in Saltford and is seeking consent for 99 new homes. This application is being fought but with no Core Strategy in place, could easily gain permission on appeal. On a smaller scale of course, it could be envisaged that a developer with an excellent legal planning team could easily argue that with the Mills land now classified as within the settlement envelope, and the enclosed land between Pipehouse Lane and Ashes Lane, albeit classified as grassland under the Plan, actually used in part as garden area, there is presented an excellent area of green land for housing in a village where open market housing has been sought and approved by the residents. And no doubt a very attractive financial package would be offered to the owners of the land.

Restricting the envelopes by only allowing immediate garden land to be included would still allow a considerable amount of true infill land to become available but this type of infill, because the plot sizes are smaller, could encourage the building of the smaller houses identified as being the open market houses needed in Freshford. The new housing would also fit better into the natural flow

of properties along our lanes, rather than a more urban style small 'close' type development.

The above is the major concern I have about the Plan and I believe it is of great importance to Freshford residents. I understand that there is no further opportunity in the timescale of the Plan for any public meeting to discuss any item in the Plan. So the only time any parishioner can have any say is when voting to accept or reject the Plan at the referendum. There is no provision for a vote on the various parts of the plan. So a very difficult decision to make, as so much of the Plan is truly excellent. The vote will be for the parishioners of Freshford and Limpley Stoke combined, so a binding change to housing areas within Freshford could easily be determined by voters of Limpley Stoke.

Unfortunately, a lot of Freshford residents are probably not aware of the implications of what is being proposed in the Plan; under the existing planning guidelines for the village, a great majority of residents did not understand the rulings. I would therefore ask that Freshford Parish Council call a public meeting at some stage before the final Plan is produced, to ensure that Freshford residents fully understand what is being proposed in the policies relating to development within the new envelopes. This open discussion approach has always formed the basis for the Freshford PC response to any major issue in the parish – ie Freshford Mill development proposals, the School development proposals, the Galleries Shop proposals, the purchase of the Tynning and the Village Hall development proposals. Surely this major change to open market housing provision, which could create a far greater long term impact to our village should also be open for public debate.

1. Minor Points: 9 minor pedantic points

i. In section 1.2, you refer to the local primary school as a junior school

ii. In section 3.0.4, you state 800 homes are allocated to rural areas, I think this has been increased to 1000 in the latest B&NES Core Strategy (SPC208)?

iii. 5.16 refers to Appendix E2 as being a Habitat Assessment report, the website suggests this should be Appendix C1?

iv. 8.13 – the weblink should read

http://weblink_http://www.hewittstudios.co.uk/downloads/130513_Options_Study_Rev_A.pdf the weblink_ bit stops it from working....and the closing ')' is missing, it would be better if the link was created as a hyperlink?

v. Table 1: mentions the Memorial Hall twice on line 1 & 4, line 4 should read 'Galleries Community Shop, Café and Public Toilets'; the legend on the map does however appear to be correct

vi. Page 34: NP Policy 1: iii) should refer to 3.3 and not 3.11 (which just refers to 3.3 anyway)?

vii. Page 34: NP Policy 2: 1-2 bed houses might be better replaced with '1-2 bed properties' therefore you are not excluding flats which make a better use of limited land area; plus in section i) of NP Policy 2 I don't understand the reference to NP Policy 11?

viii. P35 refers to diagram B & E & Z, not sure these exist, I suspect they should refer to maps?

ix. P15 the photo in the bottom right is of houses in Rosemary Lane which are part of Hinton Charterhouse.....see later in this feedback

2. Sustainable housing development: The document contains no discussion about the sustainability of new homes, given the relatively high land values and marketable values of properties in Freshford more sustainable homes would be viable. For example the neighbourhood plan could require a minimum Code for Sustainable Homes 5 standard, something which is being considered by B&NES council for greenfield sites under its Placemaking Plan, and is already a requirement for the 3 ex-MOD sites at Ensleigh, Foxhill and Warminster Road. Specifying more sustainable homes also alleviates fuel poverty in affordable housing?

3. Hinton Charterhouse Boundary: This is something I have raised with the Parish Council previously; the historic boundary with Hinton Charterhouse is a historical anachronism, particularly on Pipehouse Lane, Park Corner, Rosemary Lane and Abbey Lane. It still seems strange to me as a newcomer to the village that village policy particularly as it relates to planning (e.g. this plan) applies on one side of a road but not the other - for example the 'Housing Development Boundary'. In addition the village indirectly provides services to people in the 'Hinton Charterhouse Parish' for which officially they have no say. Is Freshford Parish Council planning on influencing Hinton Charterhouse's neighbourhood plan particularly as it relates to land east of the A36 so it is consistent with this plan? Without making this boundary adjustment the council runs the risk of significant housing development instigated by Hinton Charterhouse

to the east of the A36 occurring outside their control. The council is also missing out from the

precept from locals who use Freshford facilities but pay their council tax to Hinton Charterhouse.

4. Housing Development Boundary: I think the current document lacks clarity about the reasoning

and potential impact of the new definition of the Housing Development Boundary (HDB). It appears to me that it has been quietly slipped into this plan without enough publicity and an explanation of its potential impact, was it presented in the initial consultation and has it been discussed with villagers? It should be made clear that the existing HDB applies only to the centre of the village and this plan is extending it. It should state clearly that it provides more

flexibility for new development, is more logical but for villagers in the newly allocated areas increases the probability new homes might be built on neighbouring land. I feel that villagers should also be consulted/allowed to vote on this specific question? Personally I feel the extension is logical and support it from a community perspective, but the nimby in me would be concerned if it led to building on neighbouring land. Logically the extension should also include land on the other side of Pipehouse Lane, Rosemary Lane and Park Corner; I would hope that the Parish Council work with Hinton Charterhouse to ensure this is the case, this should be stated in any updated plan? And finally the legend on map 2 and the colouring of the map needs to be fixed as at the moment the 'Southern Envelope' defined in orange only applies to a small amount of land to the east of Woodwyck House and at Freshford Mill, the bulk of Freshford is defined by a pinker hue which doesn't appear on the legend.

I do however strongly support the definition of 'Local Green Space' on map 2

5. Limiting extensions by floor area: two statements are made in the plans:

i. Section 10: "Limiting any extension to existing properties to a maximum of 33% of their original floor space or their size in 1948, or justified through NP Policy 11"

ii. Appendix A: "Removing the 33% guideline floor space extension limit: The Management Committee reviewed the existing housing mix and the variation with which unofficial limitations on extensions have been applied by planning departments in Wiltshire and Bath & North East Somerset in the last 5-10 years. Unlimited extensions to existing housing will result in a further deterioration in the housing mix and increase the future need for affordable housing, for which there are limited sites available."

I have a number of issues with this component of the plan:

a) Technical: B&NES's current guidance on green belt extensions (HG.15 + SPD: EDitGB &

that most other councils) is based on volume and Freshford's plan appears to extend this

to 'floor space' as well, was this deliberate?

b) Linguistic/Legal: The language is vague and unclear:

The definition of "floor space or their size" is open to interpretation, does it mean internal or external or usable floor area? Does it include attached or unattached garages and outbuildings?

It is unclear what "or justified through NP Policy 11" means? Also the use of the word 'or' implies you can ignore the 33% floor space requirement and just apply NPP11 if you prefer?

c) Practical: One of the characteristics which attracted me to move to the village is that there is a low turnover of house occupants, for example in Ashes Lane where I live the average tenure is at least 20 years and this has been achieved by residents extending their homes to fit growing families; every single house on Ashes Lane has been extended. By limiting extensions and forcing families to move, which today with stamp

duty and other costs is both an expensive undertaking and disruptive, might have the unintended consequence of forcing families to leave the village? Is that the intention, if so you should state it? It is also partly incompatible with the statement made in 4.03 about young families being unable to remain in the village because of lack of affordable homes to move up to?

d) New homes: It might also be worthwhile specifying or trying to ensure that any new developments are largely terrace properties or flats which are more difficult to extend, make better use of land area and are more likely to maintain a reasonable distribution of different housing sizes in the village. Building new semi or detached properties is inevitably going to lead to extensions in the future.

Conclusion: I would maintain the current status quo just restate HG.15 + SPD: EDitGB providing guidance on disproportionate extensions potentially limited to a third of volume. I feel getting into limiting floor spaces to limiting growing families' opportunities to stay put might lead to resentment? The current volume limit is more aligned with the visual impact rather an attempt to manage the housing size balance within the village

6. Section 4: Housing: - is muddled and could do with significant restructuring/rewriting

It's quite difficult when reading section 4 to separate out fact from policy from interpretation. It's also quite difficult to understand exactly what the requirements are and how they are going to be satisfied? Potentially unhelpful comparisons are made with national benchmarks whereas perhaps they should be compared with rural benchmarks and not those which include large cities? The analysis seems to lean heavily on the Aug 2009 housing needs survey which I think may be flawed? There is also a lot of wishful thinking relating to Freshford Mill and the Rentokil site. It would be better to assess what the impact of maintaining the status quo over the last 10 years (no new homes or affordable homes) and whether the result of this 'stagnation' has had any serious negative consequences? – My feeling is the answer would be no, and therefore why is there really a need for change? There are a reasonable amount of private rented accommodation in the village which is relatively affordable compared with Bath and with low rental yields. The counter argument that villagers have voted for this as a result of this and previous consultations I think is also not valid as the need has not been adequately discussed in a public forum and that a lot of the debate is based on the Aug 2009 analysis which may be flawed?

My specific points are:

I. Presentation of statistics: these should be against rural averages and not national statistics,

rural homes are generally larger and the 21 to 40 year age group is a much lower proportion largely due to their requirements which are not necessarily about affordability e.g. social life and work requirements. The comparative statistics should also be graphical or tabular, the 'facts' section is overly wordy, only picks out a few statistics and would be better if these were largely replaced by graphs. I am also suspicious that the local statistics are correct?

II. Analysis of affordable homes requirements: The requirements for Freshford seem to lean heavily on a survey of Aug 2009 which I feel might be flawed. Without going into too much detail I believe the population sample is likely to be biased because a. it was dependent on surveys being returned only (25%) and these are likely to be biased towards those most likely to reply i.e. the more affluent and potentially retired households b. it was distributed at the school – a significant bias towards families with young children. For the survey to be valid it would have had to have been of a 'market survey' type taken on a random

representative population sample where the distribution of those surveyed more adequately represented the population. There is however a more fundamental problem in that the question which has not been asked is, what has been the impact over the last 10 years of no new house building and no new affordable homes? I would argue very little apart from perhaps house price inflation above the national average, which unfortunately has not been analysed. A follow on question would be, has the consequential rise in house prices caused any significant problems and again I would say no. Another question is, just because someone aspires to live in the village, is it the village responsibility to accommodate everyone? Personally I would like to live in a mansion and pay £1 rent per week but that is not possible? The same argument goes for both privately owned housing and rented accommodation. The only argument I can see for affordable housing is that the lack of it is a problem for people who work in the village who would otherwise need to travel in from the surrounding area. If affordability is really a serious issue then why for example has the community developed the Community Shop and Café, as I suspect this has made the village a more attractive place to live, raised house prices and reduced affordability?

III. Unrealistic expectations: the section also suggests for example that elderly people aspire to downsize, is this realistic? Certainly from my limited knowledge of my nearest neighbours is that although their homes now have more bedrooms than occupants they are quite happy living where they have lived for 20+ years, and will only move if they have no other choice reasons i.e. for health reasons or they can't afford the upkeep of their property

IV. Affordable housing: -market cross subsidy

"The Neighbourhood Plan supports the provision of up to eleven new affordable housing units up to 2033 through a rural Housing Association, together with a

limited amount of market housing to help cross subsidise these developments. Any housing development that exceeds this level of provision will need to be justified in terms of its positive benefits to the character of, and community benefit to, the villages.”

Given cross subsidy of affordable housing with market housing is generally only “viable” up to 40% affordable housing, and more commonly 30%, the implication of this statement is that you are prepared for an additional 17 to 26 market properties to be built? Could you clarify exactly how the cross-subsidy with the rural Housing Association will work and its potential impact on land value and whether ‘a limited amount of market housing’ is viable? You should also state what you mean by ‘a limited amount’, I presume you might mean under 5 for example, if so state the number, or at least an upper limit or percentage?

V. Affordable Homes: - Locations

i. Freshford Mill: Statements about Freshford Mill providing 4 to 6 affordable homes

should be removed from the document, this is clearly wishful think and presents the false impression that this will solve the problem.....the developers will never agree to selling affordable homes (typically at a 40% discount to market). It also seems regrettable that B&NES did not insist on 35% affordable homes i.e. 7 when the land was granted planning permission in the first place. I suggest the inclusion of the section on “empty-nest residents” is also wishful thinking because of the sites location away from facilities, I would assume if you were ‘empty nesting’ and therefore tending towards being elderly you might be concerned about your mobility and therefore would like to be closer to facilities like a. the community shop b. bus and rail services – Freshford Mill doesn’t satisfy these requirements? Again I would delete these comments, overall I feel

the Freshford Mill is a ‘lost cause’ from an affordable housing perspective, although given the work is not complete I don’t understand why the 21 homes can’t be included as a provision for new homes within the plan? Isn’t Freshford Mill once completed enough to satisfy all of Freshford’s housing needs through to 2030 apart from Affordable Housing?

ii. Rentokil Site: The Rentokil site is about 0.5 hectares (0.48?) which at 30 dph should accommodate 15 homes, using B&NES’s general 35% affordable homes guidance you might consider that it could provide 5 affordable homes? I think it would be useful to state the requirement for this site e.g. 35% in the document; otherwise as per Freshford Mill it will fall below the B&NES threshold and no affordable homes will be built as the developer is unlikely to want to sell homes below market value if it is optional? The other question arises, because of the dislocation of this site from the village, whether the affordable homes will have limited attraction i.e. only be suitable for young mobile singles and couples without dependents?

7. Section 5: Natural Environment: this section appears very aspirational but could do with more hard targets; there is a lot of reviewing, developing,

maintaining etc. but more substance would be helpful. For example the document mentions light pollution a number of times, but with no suggestions about how we might plan on addressing the issue? Its great that the plan attempts to address light pollution but what how exactly does the plan help reduce light pollution?

Noise Pollution: The document also doesn't mention noise pollution which is an issue on the west side of Freshford from the A36.

8. Section 7: Walking,Cycling,& Safer Roads: the document says that many roads are too narrow to support footpaths, but based on my experience of Freshford Lane the main problem is the maintenance of the hedge rows narrowing access to the footpath and forcing you to walk down the road. It might be better as well as money being spent on new footpaths, land owners adjacent to existing footpaths are reminded to more regularly cut back hedgerows?

It also seems to me that there are 2 main sources of avoidable traffic are not addressed by this report: a. school traffic b. rat run traffic during rush hour (people taking a short-cut from Winsley Hill to the A36 at Abbey Lane). The school traffic could be addressed by a re- examination of the school traffic plan to find out why there are so many half empty cars driving pupils to schools – mechanisms for addressing this include car sharing and persuading parents to walk or cycle with their children to school?

9. Section 8: Community Facilities and Assets: 8.17 the idea of a Welcome Pack is a good idea, and was mentioned in the previous village plan.....but I moved in recently and as far as I know I have not been provided with one, how are they distributed?

10. Section 9: Business & Technology: the same occurs for community assets, facilities immediately outside the area are ignored, and this also supports my previous comment on the Hinton Charterhouse boundary. Why for example is the Limpley Stoke Hotel mentioned but the Holmwood Park Hotel is not mentioned, but Brown's field is? Surely Holmwood Park Hotel is as critical to local employment as the Limpley Stoke Hotel?

Overall I agree with much of the document and feel it's a positive move for the village.

The school governors, having considered the draft Neighbourhood Plan, request that the following changes be made:

Para 6.03: to include words after reference to village green : "it includes an area identified for school play space within the B&NES local plan"

Para 6.11 manage & maintain....in a manner consistent with biodiversity....ADD IN "provision of school play space"

Para 8.12 add at start "Freshford primary school has play space provision identified within the B&NES local plan on land within the Tynning" and would benefit.....

the school governors would welcome an opportunity to discuss these details if appropriate. The governors feel strongly that the clarity of the plan would be much improved if it included mention of the existing and very relevant local plan designation regarding the school's formally recognised need for additional play space. clarity at this stage should greatly reduce possible problems or misunderstanding at later stages of plan implementation.

Comments apply to Freshford, because of lack of detail over Limpley Stoke.

Planning

This plan is meant to set a framework for 20 years.

Census data suggests that in this period, the number of inhabitants below the age of 60, analysed in 5 year groups across the age range will remain approximately the same.

In the same time period those over 65 will increase nationally from 10.5 million to 13.9 million. This is an increase of over 30%.

To suggest that Winsley could accommodate such an increase is as asinine as suggesting that any newcomers in younger age groups could be accommodated by affordable housing in Hinton Charterhouse.

There is no evidence that school applications are diminishing: the school, managed by excellent staff is a desirable school and well supported.

While new builds have been few, Freshford population has grown from 520 at the time of the first plan to 580 reported to the Planning Group. The lack of new builds reflect the villages expressed desire to keep the village as it is.

The analysis in the needs assessment quantifying the number of affordable houses required has not been open to scrutiny.

The stated 7 1-2 bedroom and 4 2-3 bedroom affordable homes should be tied to classes of users: economically disadvantaged, vulnerable adults and elderly. Each of these groups has distinctive needs and differing housing requirements.

In the case of the elderly it does not seem logical to suggest single people currently in large houses would wish to move into an affordable home. On the contrary, such people will wish to have high standard housing. The prospect of forming an extra housing grouping of high quality housing with space for a warden or carer has been missed.

For a number of years unsuccessful efforts have been made by one individual to find a site for affordable homes. There is still no identified site in the plan: however it is important that the green lungs of the village are recognised as including all the central green spaces – not just the Tynning.

In discussions within the Planning Group, affordable homes were linked to the creation of a village housing trust, securing the ability of the village to provide support to its own residents or those associated with them. There is no legal requirement on a housing association based outside the village.

If the need were to be for the number of houses envisaged above, how would new persons appearing after the initial allocation be housed ? What is the rate at which new applicants are thought to appear, and what is the expected stay for successful applicants ?

If rental properties are used, how are those housed to find bigger affordable houses as their families grow ?

Changes in Peradins made to increase the number of residents will increase traffic up to Park corner.

In past surveys and public meetings residents have made clear their desire to keep Freshford unchanged. It is not clear why this desire has been set aside.

If some limited provision was made for the elderly (as above), such development could be restricted to the industrial sites alone.

The introduction of 'envelopes' for Freshford opens the door to a variety of developments, and to developers using these to justify new schemes.

It is also the case that affordable homes can at present be built on green belt or AONB land. The plan needs to identify the areas of unbuilt land in the centre of the village that will remain inviolable.

Most of the planning section has been created by the management group and has not emerged from the planning group set up to develop proposals. Several of the members of this group do not agree with the proposals and have been excluded from serious consultation over them.

Natural Environment

As a contrast to the above, this group has worked positively, has created an on-going programme, has its own outside support and encouragement and has been managed in a positive way in which its members have been invited to contribute. It has been a pleasure to participate in its deliberations.

Village Greens & play parks

Freshford has a reputation as a rural or at worst semi-rural community, and much of its support from B&NES relies on this feature. It loses this at its peril. The danger is from creeping urbanisation and over managed green spaces, such as is evident in the plan for the Tyning and a formal path rising towards Limpley Stoke from the Galleries.

Parking

Arguably this is the crucial difficulty to life in Freshford.

With 1.7 cars per household it will be important that at least this provision is attached to any new building.

More residents equal worse parking problems. We will have 21 new households in Peradins and while parking there may be sufficient, there will be a knock-on effect on traffic in the village.

The Parish Council will need to ensure that parking rules are followed. Currently the footpath to the Inn is difficult for pedestrians; parking by the corner before Homewood Park is dangerous for vehicles and vehicles regularly park and drive on the Tyning.

This topic requires more work.

Tyning

The plan to purchase the Tyning is logical, but the price suggested is mind blowing. As a village green it should not be fenced, and if this restriction was implemented there would be no commercial use for the land. Under such conditions the value seems much too high.

Final Note:

This plan has engaged many people and despite the above, which has focussed on the problems, it contains proposals which deserve support. It is a pity that the whole is so flawed.

Please consider this as an addendum to the points made in my email submission of the 17th. July 2013.

Re Housing, I feel that further rationale could help explain my recommendation re “Infill” definition. I apologise for hammering away at this , but the envelopes are critical to Housing and I request that particular focus be given to the “Infill” definition way of resolving the doubts about clarity of policy which arise for the reasons given below. There is a risk of development taking place well beyond the intent of the Neighbourhood Plan unless the draft wording and the Map 2 are amended.

I believe that the intent for Map 2 is to indicate the areas where a strictly limited number of houses (Both affordable and market) could be built. I think also it is correct to state that there is no intention that all the open areas marked on the draft map as envelopes should be built upon. The limited intent may, however, be overwhelmed by much greater development demand as no figure is quoted for the number of market houses to be permitted, and no mechanism is included to ensure that, once the intended number of houses have been completed, no more should be built. I suggest that this is unclear and anything less than build being permitted on any of the envelope sites will probably be challenged – it certainly is challengeable.

Peter Wyatt asked me at one stage in the Group discussions if the envelope concept amounted to holes in the Green Belt – I replied, yes, effectively so . This is because the Green Belt, as applied by at least B&NES, treated new build housing in the Green Belt, other than affordable, as inappropriate. PPG2 was the basis for the Local Plan in this respect and enabled officers to apply strictly the policy of rejection of inappropriate development. Under 3.2 Policy Objectives the draft states “Importantly, the controls and restrictions of Green Belt Planning Policy would continue to apply” to the envelopes. This is at best confusing, at worst contradictory, as the envelopes by their very nature remove the most powerful Green Belt restrictions on building. In real terms of housing development, they are “Holes”.

PPG2 stopped the creeping housing development of the period before the B&NES Local Plan was adopted, which then obviously continued to respect PPG2. The whole point of the Housing Development Boundaries is to allow modest scope for housing build in which the full rigour of Green Belt restrictions could be , subject to the weighting of any other material considerations, marginally reduced. A tight definition of “Infill” was adopted.

The problem with the locally unprecedented increase in land which Map2 covers as enveloped is that it indicates that it is suitable for development, not just some of it to meet limited aims.

Applications to build are considered by ensuring that all material considerations are brought to play in any decision made, and that each of these material considerations is given an appropriate weight in such decision making. As the Draft Neighbourhood Plan stands, there is a high risk that a well briefed applicant could argue a way through intent to restrict housing build within the envelopes and could critically reduce weightings against a proposal – why ? Because -

1. The interpretation of Green Belt legislation as stated in PPG2 has been set aside by the NPPF. All that remains (With the Core Strategies unadopted), is the Green Belt legislation itself which did not stop creeping housing build until PPG2 came in, and the classification of Freshford as an R3 settlement and Limpley Stoke as a small village in the Local Plans and more recently in the Core Strategies of the two LA's as RA3 and small village. A potential developer could argue that the NPPF applies now, and that the Local Plans, being based on PPG2, are therefore no longer relevant, and that the Core Strategies have yet to be agreed – (due to housing !) . An application to build housing on envelope land (Where Green Belt protection has been diminished by the adoption of the envelopes particularly in respect of putting aside the “Openness” restriction, otherwise there would be no point in having the Envelopes), might be resisted by the Local Authority, but at appeal it would be much more likely to be accepted in view of the NPPF’s “Presumption In favour of sustainable development” overriding consideration.

2. No definition or interpretation of “Infill” has been included in the NP.

3. Whilst there is a NP quantified statement of need for affordable homes, limiting the number required, no such limitation has been applied to market housing.

4. No mechanism has been proposed to monitor the number of market houses built, or where they should be concentrated and this therefore allows for anywhere in the envelopes.

5. 4.23 positively encourages development by subdivision of curtilages as it refers to “Other housing” than that noted in 4.25, and potentially confuses market with affordable housing. “Other housing” could mean just market housing built anywhere within the envelopes.

6. NP Policy 3 : “Any housing development that exceeds this level of provision will need to be justified in terms of positive benefits to the character of, and community benefit to, the villages”. The arguments against this subjective statement are manifold. The envelope principle enables housing to be built anywhere within envelope boundaries – what constitutes character of, or community benefit to, the villages ? More housing means more population – good for local retail businesses. Why should any houses built within the envelopes detract from character if they meet the design statement stipulations ? They could be argued to improve it.

Without a tighter definition of "Infill" and a much tighter writing of the Plan in respect of development on land adjacent to the existing built areas, the Plan could become a charter for applications beyond its intent, and for appeals against refusal.

These considerations and concerns would be reduced substantially or eliminated by adoption of the B&NES Local Plan definition of "Infill", a reconsideration and definition of the extent of the land to be included for development as being adjacent to existing built areas, and the resulting re-drawing of Map2 as suggested in my Email of the 17th. July.

We own and live in Sunnycroft in Pipehouse. Pipehouse is as you know a small hamlet cut off from Limpley Stoke by fields, Freshford by the A36, and Hinton Charterhouse also by fields. Half of the properties in Pipehouse are in Freshford and the other half in Hinton with the boundary line running down the centre of Pipehouse Lane. We note that the Draft Neighbourhood Plan does recognise the unique rural character of Hamlets such as Pipehouse that surround Freshford and Limpley Stoke and that these Hamlets are separated by green fields and woodlands included in the Cotswolds Area of Outstanding Natural Beauty.

The Hamlet of Pipehouse consists of about 15 properties and we note from the Plan that it is proposed to designate the brown field site of the old Rentokil premises for housing including affordable housing. We understand that about 11 houses are proposed. This will nearly double the number of houses in Pipehouse which will make it larger than a Hamlet but still not a village as there are no amenities in Pipehouse.

We have no objections to the type of housing proposed, but to the quantity proposed as we believe this will totally change the looks and feel to the Hamlet and will not benefit the local community of Pipehouse in a positive way.

There is a natural rear building line in Pipehouse with all the houses having a frontage to the Lane. To fill this site with eleven houses would go completely against this putting the properties back into the line of the surrounding fields.

The Lane to Pipehouse is an "ancient lane" which is narrow and twisting. This Lane may have to be widened and a footpath included to account for the extra pressure of the number of proposed houses. This would be devastating to the approach to Pipehouse as the Ancient Lane is part of the character of Pipehouse Hamlet.

We would consider three to four houses frontaging the lane to be the maximum development which could still be affordable but it should be noted that there are no schools, shops or other amenities this side of the A36.

Lastly we note that there are no proposals for any new housing in the Plan other than the Rentokil and the Mill sites and we are sure that there are other plots that could be made available in Freshford Village which would be in the heart of

the village and thus very close to local amenities ie the doctors surgery once relocated into the Community Hall.

Freshford Neighbourhood Plan response –
Linton and Ann Ross - Bell Cottage, Pipehouse, BA2 7UJ

1 – Introduction

1.1 – “...it will become an integral part of the Development Plan and used to determine all planning applications.”

For many in Freshford the Neighbourhood Plan will be somewhat aspirational, if not hypothetical. For those of us in Pipehouse there is the reality of a potential development site currently under consideration and I am concerned that the Neighbourhood Plan could effectively become used as a planning and design guide or brief ahead of it having an agreed and legal status. If so it has to be more carefully considered and written than is currently the case in some important relevant items.

1.1 – “...will allow residents...to determine scale, pace and location of new developments...”

Surely it is an outlet for a resident’s view but determination of new developments is still subject to LA Planning procedures.

1.1 – “...protecting the unique rural environment which defines the character of this area?

Agreed

1.2 – “...a rolling and settled agrarian landscape with a domestic and rural character.”

Agreed

1.5 – “Over 57% of electors responded and all the outlined proposals were approved by a majority of respondents”

The inference is support by a significant majority of the villages for every proposal. Even if all the proposals were supported as stated a majority of 57% respondents need only be 29% of electors – ie 51% of 57% of 100%. What do the rest think?

3 – Development Framework

3.01 – “Freshford and Limpley Stoke include the hamlets of Sharpstone, Pipehouse, Park Corner and Waterhouse.”

I acknowledge that Pipehouse is treated effectively as if it was within Freshford but Pipehouse is 50% in Hinton. Has Hinton Charterhouse been consulted over the Neighbourhood Plan?

3.03 – “...new development should be...contained within the existing settlement boundaries.”

Where are these boundaries defined and identified?

3.04 – “...Housing Development Boundary (HDB)...”

Where is this identified, it is not shown on the maps included in the Neighbourhood Plan?

3.21 – “Two village envelopes have been drawn...defining the area of built environment...and which will define the areas for potential brown field and infill sites”

It concerns me that village envelopes might be used too literally to establish scope of new development and not the extent that is appropriate to the immediate locality.

3.22 – “Small developments, defined as developments of fewer than 9 houses,...”

In relation to the acknowledged scale of the area and the rural environment I do not agree that 9 houses qualifies as a small development.

3.3 - Village Design Statement:

“New developments:...They should be rural, not suburban in character”

I agree but I am concerned that this is a subjective statement – does anyone understand what it actually means?

“Design: The design, contemporary or traditional, must be a harmonious addition to the rural environment...”

I agree – whether contemporary or traditional, design must be of a high quality and well executed.

“Detailing:...seeking to reflect the quality of craftsmanship and materials...of the area and...location.”

I agree.

“Local concerns:...new development must take proper account of relevant planning considerations raised by immediate neighbours...”

I agree.

4 – Housing

4.02 – “...1-2 bedroom houses are needed to encourage...residents to remain in the community.”

4.04 – “Elderly residents...relocation to smaller...would free up larger housing...”

The notion that older residents will move from existing to new smaller houses in the two currently identified housing development sites as stated in 4.11 is fanciful.

4.06 – Affordable housing needs assessments 2004 / 05 – Freshford 8no
2009 / 12 – Freshford and Limpley Stoke 11no 2011 / 14 – Limpley Stoke 6no

4.21 – “...a demand for six to eight affordable homes...”

Is this across both Freshford and Limpley Stoke?

4.22 – “little specific need expressed...for housing aimed specifically at the elderly...” 4.23 “There is a need for smaller houses...for older to move to...”
These two clauses are contradictory and what is the basis for 4.23?

4.25 – “Discussions with local developers suggest the Rentokil site could accommodate 6-8 houses...”

This is presented as authoritative information. I do not agree that a local developer’s ‘suggestion’ should be cited in this way. A suitable feasibility design study is necessary to establish such a statement.

It should be noted that ‘Rentokil’ is what the site is known as but is not its current or even previous ownership.

4.26 – “Residents with large gardens...might be interested in selling some of their land for affordable housing...”

I believe this is fanciful and it should be remembered that Green Belt and AONB planning constraints may apply as well as Rural Exceptions Site policy.

7 – Walking, cycling and safer roads

7.02 – “Many of the lanes...are too narrow for pavements”

Yes. But that is the inherent rural character of the lanes in villages as well as the spaces between villages. I agree that to limit vehicle speed makes sense but do not widen roads for pedestrians, contrary to rural character.

7.05 – “The A36 is a major trunk road which divides the community and acts as a barrier for residents in ...Pipehouse...”

No. I strongly disagree. In whose opinion is 7.05 made? I do not believe that the residents of Pipehouse were asked and nor do they see the road as a barrier.

7.24 – “To improve the safety of residents crossing the A36 from...Pipehouse...use of double white lines and pedestrian refuges/traffic lights.”

The risk on that stretch of road is car to car, much more than car to pedestrian, especially when turning into Pipehouse. Road safety would be improved if the 40mph speed limit was

extended to Branch Lane and double white lines provided from Freshford Lane to Homewood Park.

Pedestrian refuge or traffic lights at Pipehouse Lane are inappropriate and unnecessary.

In relation to the development of the Rentokil site, the lane to Pipehouse is an historic route, shown on the Tithe maps and key to the character of the hamlet. Any development must be consequent upon the nature of the lane and not be used as a reason to alter the lane.

9 – Business and Technology

9.22 – “To retain local employment...by protecting existing business...”

This presumably applies to Rentokil but the Neighbourhood Plan appears to assume that the site will be developed for housing. Which is the priority option?

10 – Draft policies

NP Policy 3 – “Potential sites for development include the Rentokil site and Freshford Mill.”

Rentokil and Freshford Mill happen to both be in Freshford so is the Neighbourhood Plan saying that Limpley Stoke’s housing need is provided by Freshford?...which undoubtedly suits Limpley Stoke?

‘Sites include’...however the danger is that it will become ‘sites limited to’.

Freshford Mill has consent for 21 units, so if completed the currently identified housing need is already satisfied in excess?

Notwithstanding this in our view the development of the Rentokil site should be limited to 3 or 4 houses maximum and we have prepared layout design options in order to arrive at this view.

I have just managed to get through the neighbourhood plan.

I did have some things that I didn't agree with but they have mostly gone through the questionnaire process and got a majority response from others so I won't reiterate them here.

My remaining comment is a concern about the envelopes for development, which I hadn't picked up on before (and am not sure if I understand the extent now) but I would object to a general assumption of permitted new houses in these broad expanses of areas. To my mind allowing fairly widespread development may change the nature of the villages substantially and reduce the rural feel and real sense of community. Building in gardens and free spaces beside existing houses could create a feeling of living on a housing estate. I lived in a village in my youth, which has now become a market town and lost its sense of character and real community spirit.

Re Draft Neighbourhood Plan

Dear Madam

We live at Ashleigh Cottage Pipehouse, one of the eleven houses in Pipehouse not in Freshford Parish but one of the houses closest to the old Rentokil site which we understand the Freshford Parish Council deems suitable for a significant number of houses including affordable housing in order to satisfy its obligation to provide such

There are a total of eighteen houses in Pipehouse and we understand the Parish Council is proposing that up to 8 houses should be built there, an increase of nearly 45% in the total number of houses in Pipehouse

We also understand that there is no proposal for any further housing in Freshford village itself. Interestingly Parish Council appears to have decided to propose that the only two sites referred to in the plan are away from Freshford village itself; the other being the old Peradin site which has been half finished for a number of years and which has sufficient space to site at least 8 affordable homes in addition without any adverse effect on any existing residents

Pipehouse is on the extreme limit of the parish and as previously stated most of its houses are not in Freshford Parish

There has been no consultation with any of the householders in Pipehouse so far as we are aware and certainly not with us notwithstanding that we live in one of the three houses which will be most affected by this proposal

This proposal would permit a massive overdevelopment of the site which would be completely out of character with the rest of Pipehouse. Pipehouse was described by the architect updating Pevsner for the Bath area as a "hidden jewel"

This proposal would severely tarnish that jewel whilst keeping any such development away from the village of Freshford where the facilities such as the school, the doctors surgery, the village hall, the doctors surgery are situated.

In Alan Dodge's paper for the Freshford and Limpley Stoke Environment Working Group on the subject of the hamlets outside the village itself he wrote..."The farming hamlet of Pipehouse was located on higher ground in the west of the village...In spite of much building in the 20th century these communities still retain its (sic) isolation and specific identity. Most buildings have been constructed in local oolitic limestone...giving unity and charm to the village. This unity and charm could easily be destroyed if additions to buildings, infill, or any new buildings are in a style character or scale inappropriate to those already existing"

This proposal would destroy the isolation and specific identity of Pipehouse and it is doubtful that any developer would be prepared to go to the expense of using natural stone to build eight houses on this site, particularly when some of them will be affordable housing. It would be uneconomic

Pipehouse is served by a single track lane with no passing places which meets the A36 trunk road at the bottom. To expect a further 8 houses to be served by that lane with an inevitable increase in traffic of around 16 cars travelling up and down the lane at least once a day is unrealistic to say the least

When Rentokil was in full operation there were only 3 or 4 staff cars and one or two medium sized delivery trucks a day operating

We note that there is a suggestion to put traffic lights at the junction of Pipehouse and the A36. It is a main trunk road and it is exceedingly unlikely that the Highways Department (not BANES) would countenance this just to enable Freshford Parish to satisfy its housing requirements. To put traffic lights at this junction would have a significantly adverse effect on what is already an extremely busy trunk road, particularly at peak times

We understand the parish Council believes that the Pipehouse junction on the A36 is dangerous. We have lived in Pipehouse for nearly 29 years and in that time have only been aware of three accidents two of which occurred late at night when the vehicles in question were clearly travelling far too fast

When an application was submitted some years ago for a single house to be erected on the nursery next to the Rentokil site it was turned down on the grounds of an unacceptable increase in traffic

When planning permission was granted for the conversion of the stone barn at Homewood Farm into three houses a condition was imposed that access to these could only be via a new driveway constructed in the field alongside the land with the entrance at the bottom of the lane because the lane could not serve the extra traffic

The lane should not be widened as to do so would eat into fields in the Green Belt an Area of Outstanding Natural Beauty and the Conservation Area. It is an historic lane and was originally the route of the track from Midford to Trowbridge

Now the Parish Council is choosing to ignore issues such as these.

Turning to the site itself at present it has substantial a commercial greenhouse together with a greenhouse/warehouse which will have to be removed before any development takes place. The demolition and construction traffic for this and the construction of eight houses will considerably overload the lane making it dangerous for normal users. A development of two or three houses would create a significantly smaller flow of construction traffic

We accept there must be some residential development on the site but not more than two or three house following the existing "building line" and not jutting into the land behind on that side of the lane as that would be out of keeping.

To erect eight houses on the site including affordable housing would not only increase vehicular but also pedestrian traffic on a single track lane which is not wide enough for a footpath

With regard to the need for affordable housing we would point out that there is a pair of former council houses in Pipehouse one of which is, we believe, still used for social housing; a proportion of 17:1 for the hamlet. If the proposed development were to be permitted that ratio would increase significantly

One wonders what the proportion is in Freshford village where there are any number of areas suitable for housing development which no doubt the Council resists as it does not want to see new residential development in the village itself

The whole proposal is totally unacceptable and ill considered for all of the above reasons and should be rejected.

We have lived in Pipehouse since 1996 and were attracted by its very quiet atmosphere and the sense of separation from the "outside world". It does not feel to be part of Freshford, or indeed Hinton Charterhouse, though technically involved with both. We're very keen for that sense of being its own place to remain undisturbed.

Others have provided detailed detailed and technical observations to the document with which we entirely agree.

We feel there is some loose use of English and in particular do not agree that the Plan should form part of some presupposed guideline for, in particular, development. The expression of views is one thing but we would not want to run the risk of this document by implication having our support. In many aspects it does not.

We agree the general sentiments expressed in the document about preserving the rural character of the area. Considering building 9 houses in a hamlet of 17 hardly reflects that intention, and, taken in context is absolutely not "small development" and we would resist such a proposal vigorously.

We also feel it is essential that any development is within the context of the constraints of the existing access which is itself part of the attraction of Pipehouse.

The so called Rentokil site cannot be left unused and become derelict. A small number of houses, may be 3 or 4, conforming to the existing character of the buildings in Pipehouse taken as a whole might make sense; but the costs of developing that site would preclude anything in the context of "affordable housing" even if you ignore the distance from the school, shop, surgery and other general amenities which would be faced.

We understand the views expressed about speed limits within the village boundaries, and, feel that a 20 mph limit within the villages proper might well make sense.

Equally double white lines on the A36 on the long bend and elsewhere may make people feel safer. Whether the fear of vehicle accident is more of a problem than reality may be an issue. The junction between Pipehouse Lane, the A36 and the lane to Pipehouse is not an accident blackspot. 3 accidents in 20 years or so is about the level of the "problem". We absolutely do not regard the A36 as a barrier in the negative sense the Plan suggests.

The A36 serves thousands of people each day. Slowing down flows of traffic along main trunk roads, where there is no evidence of speed being a problem, does not seem responsible to the larger community. There is no material pedestrian traffic crossing the A36 at this point. We do not believe anyone could seriously suggest a pedestrian refuge and traffic lights.

The development site at the Mill at Freshford is one that could accommodate the numbers of new houses, both low cost (a relative term if ever there was one) and others of all desirable sizes referred to in the Plan. It would rather seem that the completed development of this site would address all the housing issues raised.

We do think it is fanciful to suggest that older members of the villages will choose to downsize and make their (presumed to be) larger houses available for families. Why would they? Is there a presumption that pensioners are necessarily not well able to maintain their homes in retirement or later years? Also if affordability is a problem, how does a sale by an older person/couple make it easier to afford a larger house in the village on the part of a family?

We are confused by the apparent contradiction of, where there is supposed to be no need for housing for the elderly, why is it proposed to provide homes for the elderly to move to?

We do not know where the Housing Development Boundary is and it would be interesting information to have.

We cannot imagine that residents with sufficiently large gardens would be interested in selling part for affordable housing for all the obvious reasons.

The nature and character of villages means narrow roads and the consequences thereof. Most will have come to these villages understanding those limitations. Speed limits should help minimize the risks to all road users.

Comments from Richard and Violanda Royds, Grove Cottage, Station Rd., Freshford BA2 7WQ

I understand that Map 2 of the Draft Plan shows various village envelopes, and in a discussion with Nick Stevens

at a recent Saturday morning surgery at the Village Hall got the impression at the end of the discussion that, in order to get the Plan through, these areas could be offered for new development.

Apparently a Bath planning officer working on the Plan feels that these enlargements to the current Settlement Areas could make areas of the village, which are currently protected, more likely to be built on.

Through conversations with a number of residents about this none, bar one, are aware of this proposed change and that one person is highly concerned about this development.

I feel residents need to properly understand the issues before they vote on the Plan. The Plan is not clear on this matter and does not show the existing Policy Map nor explain the implications of any changes. This is an important issue, since Freshford has retained a rare beauty because development has been very carefully controlled. I feel that most, if not all, residents, would oppose any loosening of current controls. I am writing to comment on Freshford Parish Council's Village Plan and its possible impact upon housing development on Pipehouse Lane where I now live. I hope I am not too late to submit a comment.

I bought my property two years ago but have only just moved in. The last two years have seen a series of battles with planning to extend the property and the logistical issues involved with renovating a property with access constraints.

Pipehouse, is approached by the narrow historical Pipehouse Lane, as seen on ancient tithe maps. It was this lane that first attracted me to the area. As much as it limited further development as it could not be expanded and created the sense of isolated community which I liked, it also caused havoc for my builders. I cannot think that the building of so many houses is possible if access is only available along this narrow lane - I struggled to even get a 16 tonne lorry to deliver.

However, if a separate access lane was created, it would distance the new development from the rest of Pipehouse, which clearly contradicts the reason for building in Pipehouse, just as is seen by The Stables; a satellite development on the other side of Pipehouse Lane, and would then be outside of the existing settlement boundaries.

The separation of Pipehouse from the main road by this narrow, old lane is inherent to the characteristic of Pipehouse. As is, in my opinion, the low density housing; eleven new houses on a lane of 18, would radically alter the character of this hamlet. I also believe, only highway-fronting housing is appropriate to maintain the unique characteristic of the area which really only allows a few houses.

I am concerned by emergency access if the lane becomes congested due to a near-doubling of properties accessed down the narrow lane.

I seek only to protect this rare hamlet which I feel so fortunate to have found - even if i had to rebuild a house in order to live here!

I am writing to give my support to my neighbours responses on this matter and note my objections to the Rentokil site on Pipehouse Lane being considered for extensive housing development.

1. Access to Freshford Mill via Rosemary Lane

a. The idea of a village entry point near the entrance to Freshford Mill is acceptable, but of little value unless it is designed so as to ensure that traffic generated by the residential development at the Mill cannot turn left out of the site or right into it. This view is supported by the BANES Highways report into the development.

b. The parking problem at the junction of Abbey Lane and Rosemary Lane has failed to be addressed.

2. 'ENVELOPES'

The concept of envelopes allows for housing development on sites where the Green Belt currently does not permit development. The amount of land so designated creates the possibility of major spread of development and increase of population which are UNPRECEDENTED in Freshford and Limpley Stoke. The Committee should rethink the map, if not the concept, and make it represent only the limited development which people of the parishes would accept. The concept of envelopes was not included in the questionnaire and there is no proof that this (or the map supporting it) has the support of the people affected by it. Villagers are in danger of being lulled into accepting proposals added surreptitiously to the Neighbourhood Plan which extend the Housing Development Boundary from the centre of Freshford.

Our straw poll reveals that a huge proportion of villagers were utterly unaware of the plan to shift the present HDB to areas now protected from building . . . and most of them would be dead against a relaxation of these curbs.

Indeed, this stealth-like proposal would drive a coach and horses through these building controls if the present "housing envelopes" were enlarged, then opened up to developers.

So why have these planners put a "gag" on publicity, offering not a jot of explanation about the threatened impact on the village?

Why was there no mention of the plan at the consultation stage?

And why has there been no effort to involve all villagers, who feel largely ignored by those we voted to represent us?

Certainly, key questions have not been answered in this muddled plan which heaves with contradiction and fails to show even the current policy map.

The most vital clue to the impending threat comes from Freshford Parish Council's chairman who admits that extending the Southern "housing envelope" would make building on Green Field sites "more likely".

Yet the Neighbourhood plan is adamant that "controls and restrictions of Green Belt Planning policy "would continue to apply".

Clearly, this is nonsense! The Galleries shop was built on Green Belt land with solid backing from the Parish Council. And while it has been a notable success, the siting of the store weakens the very "controls" the PC claims to hold dear.

Meanwhile, in an apparent move to ensure that homes are never built there, the PC spends a large sum of our money acquiring the Tynning as yet another play area – even though most Freshfordians would look on the entire village and its surroundings as a natural playground.

The PC also seems to have ruled out the notion of trying to secure near-perfect land for housing in Freshford Lane. Instead, it pursues its own agenda of shifting any house-building into outlying parts of the village.

Paradoxically, the Rentokil brown-field site, next to existing homes in Pipehouse, would be ideal for vitally needed homes. However, sources at B&NES are thought to view these areas as "unsuitable" because they are "not close enough to local amenities".

Yet, similarly, many outlying homes in Freshford and Limpley Stoke are not close to The Galleries shop either – and this was built specifically to serve both villages. So exactly what are the rules?

Meanwhile, pin-pointing the areas under threat in the Southern Envelope has been thrown into utter confusion by a section of Map 2 which appears to show that a large slice of a couple's garden off the Warminster Road would be suitable for house-building.

Sources on the PC and at B&NES have put this down simply to a mistake on the map . . . a "colouring mis-match".

Yet, significantly, those behind the Neighbourhood Plan have failed to correct the map on the Net or make a public statement admitting the howler.

And from the land-owner himself the silence is deafening.

Applaud amount of effort put in and mostly support. However I have following comments: -

- 1) I oppose affordable housing in Freshford when there are many underdeveloped brownfield sites in Bath which are closer to employment and transport links.
- 2) It should be remembered that this is a village and should remain as such, not become a suburb of Bath. Those who want town facilities can live in a town i.e. NO skateboard park, NO extensive street lighting.
- 3) In an era where wildlife is being destroyed and their habitats removed, we should be protecting as much as possible!
- 4) NO increase in parking at the station please - Station Road is not suitable for large volumes of vehicles - WALK to station.
- 5) Electric vehicle charge points are a waste of public money until a real need is identified. Existing ones in towns are under utilised. Much higher priority things needed!

Living in Sharpstone, my main concern is with the probable development of the mill. I see that it is attractive to planners, but the last time it was attempted there was no provision made to STOP vehicles coming out of the mill going straight up Rosemary Lane. (Discouragement alone will not be enough). If allowed it will lead to traffic chaos, road rage and collisions (of which there is already too much).

Please make it clear BEFORE the vote, if non-voters are going to be assumed to consent. (This anti - democratic ploy is being increasingly used).

Areas marked 'available for infill' have no numerical limit on allowed development. Hard to vote on a blank cheque!

Otherwise a good plan.

- 1) I am worried that there is no limit to the number of houses allowed in 'infill' in each envelope. Can we put a cap on it?
- 2) Sharpstone residents are annoyed by the attitude in the plan that extra development at the mill site is neatly out of the way. Not for us it isn't. Visually, in terms of noise and in terms of traffic, it is a potential nuisance.
- 3) Relating to extra housing, I am worried about the increased traffic in our single track lanes around the village. Especially in places like Rosemary Lane where there are safety issues.
- 4) How will local people vote on the plan? If only 59% (or thereabouts) responded to the consultation survey, how many will vote? Will those who don't vote be seen to be in favour?

5) The rest seems sensible!

Having more houses at Freshford Mill than are already agreed is not a good idea. There will be enough problems with noise, light, traffic and infrastructure. Was blocking Rosemary Lane at the bridge discussed? As it is the only sensible solution.

Also, 'infill housing' should have limits and be properly defined.

I am very concerned about the infill housing and lack of limits on it or proper definitions. The idea of more housing at the Mill is not appropriate, even 21 houses is too much. The traffic implications are huge, especially as Rosemary Lane is already dangerous. We cannot have more traffic using Rosemary Lane - blocking it off is the only practical option. This did not seem to be in the draft.

Please, dropped pavement for mobility scooters, wheelchairs, pushchairs, prams. Especially access to the pavement that goes under the railway bridge in Limply Stoke and the other end of that short pavement. Also along Lower Stoke.

ALL the proposed new footpaths/pavements are not in keeping with the rural openness of the area. (See facts 3.0, paragraph 3.02) "Policies also aim to preserve the openness and permanence of the lands surrounding and within the settlements"

The proposed footpaths would be detrimental to the environment for a huge number of ecological reasons. There is not enough room to discuss the reasons here.

Well done - clear presentation must all have been very hard work for you all.

Suggestions -

Initiate a tree protection order survey to identify significant trees.

Include reference for allotments. Are existing or proposed?

Firm proposal on building materials - no more render please

A major problem in the village is the problem of parking. I did not notice any plans addressing this problem.

7.24 I strongly object to the concept of traffic lights on A36 at either Pipehouse or Midford Lane. These will effectively signpost or force the traffic into the

villages which is what we wish to ignore. It seems contradictory to the safe gateways, red markings and 30 mph signs.

What a lot of hard work! - well done.

1.2 School is a Primary School, not a Junior School

The footpath from the Inn to Avoncliffe is not marked on the map 4 and is one of the most used in the village. This needs attention in the wooded area and is dangerous.

The figure of 10% of residents aged between 21 - 40 - is this correct, it seems very low? Surely there are more residents between 30 - 40

Map 2 - orange field next to 2

NP policy 3 6 - 8 houses not 11

8.06 "Parking is limited and there is no disabled access"

8.18 "reduce low levels of ? activity"

Map 4 - new footpaths.

Footpath from St. Mary's church to village hall playing field. PLEASE reconsider the repositioning of this footpath as the new route is extremely steep alongside the Dawson's field. Please walk up it before you choose this route - the original route is far more 'user friendly'.

Overall ? Is powerful

Section on business is poor - unenlightened - needs more thought and development - what commerce do we want? I can help develop this.

Paragraph 4 - 24 objectives states - limited 3 bed houses

Draft policy - NP policy 2 states 1 - 2 bed houses. No mention of limited 3 bed houses

It is evident that a lot of hard work has gone into the Neighbourhood Plan. Some proposals are sound and welcome, such as the 20 mph zone (NP8) and sensitive lighting (NP6). On the other hand, we feel that others are misguided, such as the provision of affordable housing (NP2). We fundamentally disagree that affordable housing should be provided for local young people who have grown up in the area. We both grew up in beautiful villages in Oxfordshire and Surrey and did not expect our connection with the area to be just reason to be given

financial favoritism over the free market. In Freshford we are close to several more 'affordable' settlements such that a young person already has ample opportunity to remain in the locality.

However, our key concern focuses on 4.25 and NP3. 21 houses is already far too many for the Freshford Mill site, especially in the view of the poor access. Local residents fought for a number of years to reduce the number of housing units. Why does the plan propose an increase in the number of units - a policy that is plainly against the wishes of local residents?

If affordable houses are appropriate (which is questionable) they should be included within the 21 houses already proposed.

The Freshford Mill site itself is partially in the parish of Freshford and partially in the parish of Hinton Charterhouse (see map on page 39). It is not appropriate and perhaps not legal, for a plan for Freshford and Limpley Stoke to include within its scope a site of which a substantial proportion falls within another parish. Furthermore, some of the nearest residents (e.g. Dunkirk Mill, Middle House, Walnut Grove and all of Staples Hill), who would be most affected by the development there, are in the parishes of Hinton Charterhouse and Westwood and have no right to vote on this plan. It is not appropriate for Freshford residents and Limpley Stoke residents, in particular, to impose policies on local residents from other parishes.

Many of those most directly affected by the Mill Development (whether resident in Freshford, Hinton Charterhouse or Westwood parishes) will bitterly oppose any moves to increase the number of units proposed for the Freshford Mill site.

It is suggested that any proposals for Freshford Mill be removed from the Plan or at the very least amended to match the wishes of local people.

We also wish to comment of the following sections:

7.24 - Traffic lights on the A36, especially at the top of Church Lane, could increase traffic through the villages. Already many motorists rat-run through the village (e.g. Trowbridge to Bath traffic). The provision of traffic lights would encourage traffic to divert through the villages along Church Lane to avoid waiting in queues.

4.26 - Spacious gardens contribute to the rural ambiance of the villages and are part of their unique character. As recognised by the BANES Council Planning Services and set out in the March 2007 Freshford and Sharpstone Conservation Area Character Appraisal: " Large formal gardens attached to the grander houses [of Freshford and Sharpstone] enhance the setting of the higher status buildings and contrast with the more modest plots attached to the cottages" (page 17 - Trees and Green Spaces) Spacious gardens are not just an asset to the houses they are associated with, but to the community as a whole, providing views, privacy and tranquility to others. Sub-urbanising the villages by building on gardens would be to the detriment of their character and should not generally be

encouraged. The grounds of Abbotsleigh for example, including the wooded field adjoining Rosemary Lane are important to the character of Sharpstone and should not be ear-marked for development.

4.26 - 'Infilling' is not defined. Does this mean it should be confined to small vacant plots surrounded by development on three sites in an otherwise built up frontage, as defined by BANES, does it mean anywhere within an "envelope"? This should be clarified before residents can reach a view. As set out in the 2007 Freshford and Sharpstone Conservation Area Character Appraisal "infill may affect the integrity of the village within its rural setting." (page 18 - Management Proposals) and the impact of any infilling must be carefully considered on a case-by-case basis. Sanctioning infilling generally through a Neighbourhood Plan presents a material risk to the character of the villages.

3.22 - We do not agree with this. A single large development with good access could alter the character of the villages less and cause less pressure on parking, traffic and services than multiple "infill" developments of 9 houses squeezed on every scrap of space all over the villages.

I have recently reviewed the latest draft version of the Freshford and Limpley Stole Village Plan and wish to make a comment on policy 7.24 "To improve the safety of residents crossing the A36 from Midford Lane and Pipehouse, seeking Highways Agency recognition in the investigation of speed limits and the use of double white lines and pedestrian refuges/traffic lights.

My wife, Nicola, submitted a brief note of feedback at the recent Village Hall review session on this policy point, but I wish to provide more detailed commentary having looked again at the Plan and having re - reviewed the comments you received previously on this point.

I believe that policy point 7.24 needs to be removed and /or reworded for the following reasons:

1) The policy point 7.24 contains 6 areas for consideration. It refers to two possible points of crossing across the A36 as well as 4 possible traffic calming measures. I do not believe that it is reasonable to ask residents to support so many different options in one single policy point because they might be in favour of one component, but not another component , but they have no means to express this.

2) I object specifically to the proposal for traffic lights at both the junctions with Pipehouse and Midford Lane contained within policy 7.24 for the following reasons:

2.1) Traffic lights will cause traffic backlogs along the A36 from waiting vehicles leading to increased noise and chemical pollution. Similarly, traffic will be queued along Church Lane, Midford Lane, Pipehouse Lane and Pipehouse causing the same issues.

2.2) Waiting traffic will contribute to the increased likelihood of emergency vehicles needing to use their sirens along the A36. There is already this issue of siren noise pollution on the A36.

2.3) The A36 is a trunk road (as residents we need to accept the fact that we have a busy road to where we have chosen to live) and traffic lights could cause dangerous collisions. Focus should be on speed reduction.

2.4) Traffic lights will effectively highlight and promote 'turn off' options into the village directing more traffic from non-residents into the two villages, using them as a cut through. Such traffic might have been unaware of these roads or at present have waited further along the A36 outside of the villages to turn left or right. In creating a pause point on the A36 it makes it easy to turn off. Encouraging more traffic down these village roads will directly undermine the considerable effort that has been put into recent traffic calming measures on Church Lane and Midford Lane as well as the proposed village gateway signs elsewhere in this plan.

2.5) In reviewing the feedback in the Making Progress questionnaire pertaining to this policy point there were a significant number of comments made in reference to this initiative of crossing options on the A36, yet only two comments were in favour of traffic lights on the A36. Approximately 16 respondents specifically stated 'no' to traffic lights on the A36 with the rest raising general concerns about the feasibility of various calming measures. Most positive feedback was for pedestrian crossings. Therefore I believe that the continued inclusion of proposed traffic lights in the Plan is in direct contradiction to the feedback received to date on the Plan.

2.6) I believe that adding traffic lights on that junction will create a more 'urbanised' environment for the villages, directly contradicting the essence of what the Plan is trying to achieve in terms of maintaining a rural feel of the village.

I am a resident of Church Lane, so have direct experience of the current challenges with traffic speeding excessively down Church Lane. I firmly believe that traffic lights will exacerbate this problem materially, and undermine many of the efforts to reduce traffic speed within the villages that I was personally involved in via the Limply Stoke Parish Council Traffic Calming Committee.