

Statement of Common Ground

B&NES Core Strategy – Green Belt Allocation at
East Keynsham (Proposed Policy KE3A)

Peter Brett Associates on behalf of Waddeton Park Limited

And

Bath & North East Somerset Council

13th February 2014

1.0 Introduction

- 1.1 In his note of 3rd January 2013 ([ID/44](#)) the Inspector outlined his requirements in terms of Statements of Common Ground that he would like to be prepared in advance of his preparation for the hearings in March/April 2014. He has also confirmed the dates and scope of coverage for these hearing sessions.
- 1.2 The Inspector has requested that the Council and the various owners/developers/promoters of the Green Belt sites proposed for allocation in the November 2013 Amendments should prepare Statements of Common Ground relating to delivery and environmental impact of those allocations as per the Council's proposals in the following revised policies:
 - B3A Land Adjoining Odd Down, Bath
 - B3B Land Adjoining Weston, Bath
 - KE3A Land Adjoining East Keynsham
 - KE4 Land Adjoining South West Keynsham
 - RA5 Land at Whitchurch
- 1.3 The deadline for submission of hard copies of these Statements of Common Ground to the Inspector is noon on 14th February 2014; the Council has a working deadline of **7th February** in order to ensure timely completion.
- 1.4 The Inspector has specified in ID/44 what the Statements of Common Ground, should include (but not be limited to); this template covers these issues accordingly:
 - Delivery: Availability/start on site/likely annual completions (assuming that the Core Strategy is adopted by Autumn 2014).
 - Evidence already submitted relating to the main documents, including the evidence from landowners/developers included in the Core Documents or submitted with representations to the November consultation.
 - The Statement of Common Ground should make clear which parts of evidence are agreed and where there is disagreement briefly the main reasons for that disagreement.
- 1.5 The Inspector has suggested that the Statements of Common Ground may need to involve parties not currently active in the Examination, but they will only have a right to be heard if they have already made representations at an appropriate opportunity. The Council considers that this relates primarily to landowners who have not previously been involved in the examination process prior to Nov-Dec 2013.
- 1.6 In addition, Statements of Common Ground between the Council and other promoters in relation to their suggested alternative or enlarged proposals are welcomed by the Inspector as separate submissions. This Statement of Common Ground relates to the Council's proposals in revised Policy KE3A.

2.0 Description of the site

- 2.1 The proposed site allocation comprises c.12.5ha of land south of the A4; and c.7.5ha north of the A4.
- 2.2 The area is principally characterized by arable, pasture and grass lands with hedgerows, ditches, some trees and other countryside features.
- 2.3 The railway which runs east to west between Bath and Bristol defines the northern boundary of the site.
- 2.4 The topography of the area is reasonably flat with a gentle incline from north to south across the site.
- 2.5 There are areas of housing in Keynsham to the west and Saltford further to the east. There are also small fragmented clusters of residential development that front onto the A4 that adjoin the site. The A4 is a major public transport corridor. Wellsway secondary school lies adjacent to the site to the south of the A4, on the eastern edge of Keynsham; the town centre of Keynsham is further west from here, approximately 1.2km along Bath Road and Bath Hill.
- 2.6 To the north of the A4 adjacent to the site lies a broad mix of land uses including industrial units, large format retail, some pockets of housing, a nursery and farm.
- 2.7 The Manor Road Community Woodland lies adjacent to the south west edge of the site.
- 2.8 See map included in **Appendix 1**.

3.0 Delivery: Matters of Agreement and Disagreement

- 3.1 The area of the site to the south of the A4 is included in the SHLAA as available with moderate to high 'suitability / credentials' (SHLAA, November 2013 - **CD10/E19** Appendix 1c – **Location K27a** Withies Farm, South of A4). The area of the site to the north of the A4 is included in the SHLAA as available with low to moderate 'suitability / credentials' (SHLAA, November 2013 - **CD10/E19** Appendix 1c – **Location K27c**¹ Glenavon Farm, North of A4).
- 3.2 Waddeton Park does not agree with the relative assessment of the 'suitability / credentials' of land north and south of the A4 respectively as set out in the SHLAA.
- 3.3 In their submission to the Core Strategy consultation (December 2013), Mactaggart and Mickel indicated that the land within the proposed site

¹ Referred to as K27c in the summary, but assessed on page 24 under reference K28.

allocation was fully under their control. The red line boundary is indicated within their Concept Report and in the appendices of **CD10/LD3d**.

- 3.4 Mactaggart and Mickel have since clarified that land to the north of the A4 was erroneously included within the red line boundary and is not within their control.
- 3.5 The area of the proposed allocation north of the A4 is within the control of Waddeton Park Limited.
- 3.6 Waddeton Park Limited state that that if the proposed allocation north of the A4 remains solely allocated for employment uses that it is unlikely to be delivered.
- 3.7 Mactaggart and Mickel control all the land within the proposed allocation to the south of the A4.
- 3.8 Mactaggart and Mickel also control all the land within the area of proposed safeguarded land to the east of the proposed allocation.

4.0 Key relevant evidence

- 4.1 The key evidence prepared by the Council in relation to land at East Keynsham is as follows:

<p>Key evidence 2011-2012</p>	<ul style="list-style-type: none"> • Previous iterations of SHLAA • Green Spaces Strategy CD4/ENV3 <p>NB Much of the earlier Core Strategy evidence is in part superseded by more detailed evidence prepared to support the allocations as outlined below.</p>
<p>Additional evidence to support proposed changes</p> <p>Submitted March -Sept 2013</p>	<ul style="list-style-type: none"> • East Keynsham Development Concept Options Report CD9/CO2 • Core Strategy Additional Evidence Heritage Asset Study CD9/LV/1 Main Report, Appendix 6 and Appendix 7 • Keynsham East Landscape and Visual Impact Assessment CD9/LV/7 • Green Belt Review Stage 1 CD9/E2 • Green Belt Review Stage 2 CD9/E9 • Affordable Housing Viability Study CD9/H1 • Flood Risk: The Sequential and Exception Tests Update CD9/FR3 • Infrastructure Delivery Plan CD9/I1 • Transport Evaluation Report Main Report CD9/I2/1; and appendices including Appendix E Land Adjoining East Keynsham and Appendix EE: Scenario 2 – RTA calculations CD9/I2/6; Appendix K: Accession Maps:

	<p>Walking and Cycling CD9/I2/12; Appendix L: Accession Maps: Public Transport CD9/I2/13; Appendix N: Ward Model Share & Ward Maps CD9/I2/15</p> <ul style="list-style-type: none"> • The Need and Potential for Employment Land Provision (to be given a Core Document number).
<p>Documents associated with the Core Strategy strategic site allocation</p> <p>Submitted Nov 2013</p>	<ul style="list-style-type: none"> • Preliminary Arboricultural Assessment – East Keynsham CD10/E6 • Bath and North East Somerset – Community Infrastructure Levy: Strategic greenfield allocations – viability testing CD10/E7 • Addendum to Landscape & Visual Impact Assessment: Keynsham CD10/E13 • Renewable Energy Assessment for B&NES Green Belt sites: Assessment CD10/E16 • Valuing people, place and nature – a Green Infrastructure Strategy for B&NES CD10/E17 • Strategic Housing Land Availability Assessment (SHLAA) CD10/E19 • Extract B&NES Playing Pitch Strategy CD10/E20 • B&NES Local Education Authority – Education Requirements for the sites CD10/E21 • Transport Access Assessment Core Strategy Greenfield Site Allocation Keynsham CD10/E22 • B&NES 51
<p>B&NES response to Nov 2013 consultation reps</p>	<ul style="list-style-type: none"> • CH2M Hill Transport Modelling (forthcoming) • Need and Potential for Employment Land Provision (forthcoming)
<p>Assessments</p>	<ul style="list-style-type: none"> • Sustainability Appraisal Annex L – Locational Alternative Appraisal Matrices CD9/A1/5 • Sustainability Appraisal Matrices (Annex O) CD10/A1/3 • Previous iterations of the SA

4.2 The landowner has not submitted any technical reports.

5.0 Summary of Agreed Matters

5.1 The matters agreed relate to the current proposed allocation as outlined in proposed policy KE3A. The following are matters agreed between the parties for the proposed allocation:

- The principle of removing land from the Green Belt for residential and employment development with associated infrastructure on land east of Keynsham is supported.
- The Placemaking Principles are supported in general with the exception of the specific points raised below in the matters in dispute surrounding Principle 1.
- The principle of preparing a comprehensive masterplan, through public consultation and agreed by the Council is supported.
- The rejection of alternative option KM1 north of the railway line is consistent with the Council's evidence base relating to landscape impact, Green Belt impact and delivering sustainable development that is well integrated with existing communities.
- The proposed site allocation is assessed in the Council's Landscape and Visual Impact Assessment (**CD9/LV/7**) as having 'medium significance of development effects', apart from land parcel 'B2' north of the A4 which is assessed as having 'low significance of development effects'.
- The National Grid National Transmission System (NTS) high pressure gas pipeline is situated immediately to the east of the proposed allocation.
- The principle of new development incorporating an element of natural materials is supported in order to respond to and enhance the character of the area, and is consistent with NPPF paras 58, 59, 60, 61 and 64.
- The principle of retaining and enhancing existing public rights of way is supported.

6.0 Summary of Matters in Dispute

6.1 There continues to be dispute between the parties on the following matters:

- The landowner believes that the site is being inappropriately limited with artificial constraints and that the land identified for development should extend further to the east to include Broadleaze Nursery. The Council disagrees that the constraints are artificial. The constraints include the National Grid high pressure National Transmission System gas pipeline (as shown in the IDP page 28 **CD9/I1** and the SHLAA **CD10/E19**).
- The landowner believes that the area within the proposed allocation north of the A4 should contain a mix of housing and employment. The Council is proposing to allocate this area solely for employment uses.
- Placemaking Principle 1 is disputed by Waddeton Park as they believe that the number of dwellings could increase with the land that they are

promoting and with the use of the land allocated for employment as residential instead.

- Placemaking Principle 1 is also disputed by Waddeton Park because they believe that the average density to be achieved is too high in this location on the urban/rural edge and in the market likely to prevail at the time of the development. Waddeton Park state that this could create difficulties in agreeing the masterplan between the different landowners and inhibit the delivery of the development.

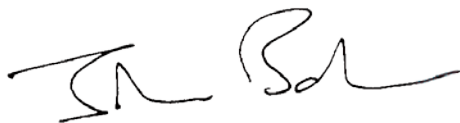
7.0 Other matters

- 7.1 The proposed allocation included in Policy KE3A was assessed as part of a wider Transport Evaluation Report (CD9/12/1-27) which included potential for sustainable modes of transport, highways impact and potential for mitigation, forecast emissions and road safety. Based on this assessment, the land adjoining East Keynsham scored averagely except access to bus and cycle services which both scored well.
- 7.2 Further transport modelling was undertaken by the Council mainly during 2013 using a micro-simulation transportation Paramics model of Keynsham. The modelling results have been published and submitted to the Inspector on 14th February (Keynsham Core Strategy Options: Highway Impact Assessment, CD12/18). Therefore, further discussions will take place during the lead up to the hearings to identify further areas of agreement or disagreement between the parties. A supplementary SoCG may then be prepared to provide the Inspector with clarity the Hearings.

8.0 Declaration

- 8.1 The content of this document is agreed for the purposes of the B&NES Core Strategy hearing 2014.

Signed on behalf of Waddeton Park Limited:



Position: John Baker
Partner Peter Brett Associates

Date: 13 February 2014

And

Signed on behalf of Bath & North East Somerset Council:

Richard Daine

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Position: Planning Policy Team Leader

Date: 13th February 2014

Appendix 1: Site Plan

