

Statement of Common Ground

B&NES Core Strategy – Green Belt Allocation at
South West Keynsham (Proposed Policy KE4)

Pegasus Group on behalf of Bloor Homes South West

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 KE4.

- 1.7 An additional Statement of Common Ground has been prepared in relation to an enlarged proposal for the additional land that is being promoted by JS Bloor.

2.0 Description of the site

- 2.1 The proposed strategic site allocation as shown on the Concept Diagram (change reference CSA38) comprises c.8.2ha of land to the south west of Keynsham, immediately south of the Local Plan site allocation 'K2a'. Bloor Homes estimates that the developable area is 5.98ha (land cells H1 and H2 from the submitted revised development framework – December 2013).
- 2.2 The proposed site allocation was based on the land within the red line boundary as shown in the December 2011 Pegasus Sustainability Appraisal. The extent of land within the proposed site allocation in control of Bloor Homes is shown within the revised development framework submitted by Pegasus.
- 2.3 The revised development framework shows that all the land within the proposed site allocation is under the control of Bloor Homes apart from a dwelling and its curtilage on Parkhouse Lane known as 'The Bungalow'.
- 2.4 An additional dwelling and its curtilage known as "Wellfield House" which is adjacent to "The Bungalow" is not included in either the revised development framework plan or proposed site allocation.
- 2.5 The area is principally characterized by pasture and grass lands with hedgerows, trees and other countryside features associated with an area of open countryside.
- 2.6 The northern boundary of the proposed site allocation is defined by a hedgerow which also forms the southern boundary of K2a (site allocated in the adopted Local Plan). This boundary lies between 300-350m south of the current dwellings situated along Holmoak Road which represents the current edge of the Keynsham residential area.
- 2.7 Abbots Wood, managed by the Woodland Trust, lies adjacent to the north east of the site.
- 2.8 Charlton Road defines the western boundary of the site.
- 2.9 Parkhouse Lane defines the eastern/southern boundary of the site.
- 2.10 The site lies on the mid-slope of a gently sloping plateau falling towards Keynsham from the west/south west. There is a change in level of 15m from the western boundary to the north east corner of the site along Parkhouse Lane.
- 2.11 The village and Conservation Area of Queen Charlton is situated c.500m to the west of the site, and separated from the proposed allocation by a low ridge. The separation is emphasised by extensive tree planting.
- 2.12 See map included in **Appendix 1**.

3.0 Delivery

- 3.1 The site is included in the SHLAA as available with low ‘suitability / credentials’ (SHLAA, November 2013 - **CD10/E19** Appendix 1c – Location K17a-e (Parkhouse/Redlynch Lane).
- 3.2 The land within the proposed site allocation is within the control of Bloor Homes.
- 3.3 The SHLAA trajectory (November 2013) estimates that housing delivery could commence on site in 2016/17, delivering 30 dwellings during that financial year, with 50 dwellings completed every year thereafter until 2019/20, and a final year of 20 dwellings completed in 2020/21. Overall it is estimated that 130 dwellings will contribute to the 5 year housing supply between 2014/15 and 2018/19.
- 3.4 Bloor Homes estimate that 179 dwellings (as set out in the revised development framework) from the site will contribute to the 5 year housing supply between 2014/15 and 2018/19. Ie at 60 dwellings per year commencing in 2016/2017.
- 3.5 Bloor Homes confirms that this is a realistic and reasonable delivery rate.
- 3.6 The Council notes this and will update the delivery rate in the next revision of the SHLAA.

4.0 Key relevant evidence

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

Key evidence 2011-2012	<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>
Additional evidence to support proposed changes Submitted March -Sept	<ul style="list-style-type: none"> • South of K2 Development Concept Options Report CD9/CO4 • Core Strategy Additional Evidence Heritage Asset Study CD9/LV/1 Main Report, Appendix 4 and Appendix 7 • Keynsham South Landscape and Visual Impact Assessment CD9/LV/8 • Green Belt Review Stage 1 CD9/E2 • Green Belt Review Stage 2 CD9/E9

<p>2013</p>	<ul style="list-style-type: none"> • Preliminary Ecological Surveys and Assessment – South West Keynsham CD9/E12 • 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 F Land Adjoining South West Keynsham and Appendix FF: Scenario 3 – RTA calculations CD9/I2/7; Appendix K: Accession Maps: 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>Documents associated with the Core Strategy strategic site allocation</p> <p>Submitted Nov 2013</p>	<ul style="list-style-type: none"> • Preliminary Arboricultural Assessment – South West Keynsham CD10/E5 • Bath and North East Somerset – Community Infrastructure Levy: Strategic greenfield allocations – viability testing CD10/E7 • Fields East of Charlton Road Ecological Survey CD10/E10 • 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 • 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>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 prepared a number of detailed technical reports on matters relating to transport, ecology, landscape & visual appraisal, flood risk and drainage, archaeological and heritage appraisal, and utilities. These technical reports have been submitted to the Council in support of their representations on amendments to the Core Strategy (published for consultation November 2013) and previous iterations of the Core Strategy. Key evidence is summarised below:

<p>Key landowner evidence</p>	<ul style="list-style-type: none"> • Sustainability Appraisal (incorporating ecology, landscape and visual appraisal, archaeological and heritage appraisal, flood risk and drainage, traffic and transport and utilities) – December 2011 • Landscape Capacity Review and appendices – November 2013 • Transport Representations – November 2013 • Revised Development Framework – November 2013
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5.0 Summary of Agreed Matters

5.1 The matters agreed relate to the current proposed allocation as outlined in proposed policy KE4. A separate Statement of Common Ground is being prepared for an enlarged site as proposed by the landowner. The following are matters agreed between the parties for the proposed allocation:

- The principle of removing land from the Green Belt for residential development with associated infrastructure on land to the south west of Keynsham is supported.
- The principle of preparing a comprehensive masterplan, through public consultation and agreed by the Council (‘placemaking principle 2’) is supported.
- The principle of providing off-site highway capacity improvements, including the St Ladoc Road/A4175 Bristol Road/Trescothick Close roundabout and A37/Queen Charlton Lane junction is supported.
- The principle of providing pedestrian and cycle connections to K2a and along the eastern side of Charlton Road as shown on the Core Strategy concept diagram is supported.

Placemaking Principles

- The following principles have not been expressly objected to by the landowner, and are therefore supported in principle: **2, 3, 4, 5, 7, 8, 9, 10, 12, 13, 14, and 16.**

Principle 6

- In the context of the current allocation as proposed for 200 dwellings, the use of Parkhouse Lane as a boundary is supported by Bloor Homes. However, Bloor Homes object to Principle 6 because they believe in principle that a larger site should be allocated which does not include Parkhouse Lane as a boundary.

Principle 11

- Principle 11 is supported which includes the requirement for a direct highway access to Charlton Road.

6.0 Summary of Matters in Dispute

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

General Matters

- The landowner believes land at South West Keynsham has the potential to accommodate a greater number of dwellings than the 200 identified in the proposed allocation.
- The landowner believes the release of Green Belt land at South West Keynsham should be greater in order to safeguard land for development in the longer term (i.e. beyond the Plan period).
- The landowner believes that the Council's conclusions on safeguarding of land are inconsistent with its evidence base because the Arup Concept Options Report (**CD9/CO4**) identifies development potential beyond that currently proposed.

Placemaking Principles

- The landowner believes that the second paragraph of Policy KE4 should be reworded to state '*The placemaking principles are consistent with the Core Strategy and set out the requirements that need to be met when the site is brought forward for development*'.

Principle 1

- The landowner believes that a more appropriate density on the edge of the settlement would be 30dph but that this could vary across the site. The Arup Concept Options Report (**CD9/CO5**) recommends a density of between 35-40dph and therefore the Council disagrees that the wording in Principle 1 requiring an average across the site of 35dph is inappropriate.

Principle 15

- The landowner believes that the expectation that the proposed allocation provides sufficient renewable energy generation to reduce carbon dioxide emissions from expected energy use in the buildings by at least 20% is unreasonable. The landowner believes the current wording should be changed in favour of either setting a 10% target and/or re-writing the policy to allow a more flexible approach for developers to achieve carbon reductions equivalent to 20%. The landowner also believes the wording for KE4 should be amended with a caveat that supports renewable energy provided it is viable. The Council disagrees and believes that the Regen SW assessment (**CD10/E16**) provides justification for Principle 15.

7.0 Declaration

- 7.1 The content of this document is agreed for the purposes of the B&NES Core Strategy hearing 2013.

Signed on behalf of XX:



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Position: Director Pegasus Group

Date: 13th February 2014

And

Signed on behalf of Bath & North East Somerset Council:



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Position: Planning Policy Team Leader

Date: 13th February 2014

Appendix 1: Site Plan (Proposed Site Allocation Concept Diagram)

