

Statement of Common Ground

**B&NES Core Strategy – Enlarged Strategic Site at
South West Keynsham**

**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 an enlarged proposal.

2.0 Description of the site

- 2.1 This site at south west Keynsham extends to approximately 55.61 hectares (gross). The enlarged strategic site (including the site allocated in the Schedule of Core Strategy Amendments Nov 2013) is bounded primarily to the north by Parkhouse Lane, to the west by Charlton Road, to the south by Redlynch Lane and to the east by the slopes of the western side of the River Chew valley. Immediately to the north of the proposed area of 200 dwellings to be allocated, is the adopted B&NES Local Plan allocations, K2A and K2B a planning application has recently been submitted on K2A and K2B is currently under construction by Taylor Wimpey.
- 2.2 The site currently forms agricultural land and is subdivided into a series of irregular shaped fields. The boundaries of these fields are generally demarcated by mature hedgerows, many of which have grown unchecked into lines of mature shrubs and trees, while others remain managed to form dense hedgerows.
- 2.3 The whole of the site is currently designated as Green Belt.
- 2.4 The site and the surrounding area are not subject to either statutory or non-statutory landscape designations.
- 2.5 No public rights of way cross the site.
- 2.6 Abbotts Wood is a community woodland managed by the Woodland Trust which lies to the north of the site between the allocated Local Plan sites of K2A and K2B.
- 2.7 The site lies on the mid-slope of a gently sloping plateau falling towards Keynsham from the south west. The south western part of the site forms the highest ground at c.77m AOD. Within the site there is a change in level of around 30m from south-west to north-east. The northern area is of similar profile to the K2 site and existing edge of Keynsham and thus has a degree of topographic continuity.
- 2.8 The eastern boundary is defined by the ridgeline. Land to the east of the site follows a pronounced river valley.
- 2.9 The site lies within the north eastern corner of the Dundry Plateau Landscape Character Area as defined in the Rural Landscapes of Bath and North East Somerset Landscape Character Assessment SPD. This area is mainly characterised by medium-sized, irregular-shaped fields with strong, high species-diverse hedge boundaries and tree belts; buildings are largely in small groups of isolated farmsteads.
- 2.10 A gas pipeline runs through the south-west corner of the site (referred to as the Corston to Brislington BGSW/CB/4).

- 2.11 Part of the site south of Parkhouse Lane is crossed by a network overhead 11kv and 33kv electric lines.
- 2.12 The Pegasus Development Framework (available in the Core Documents List) defines the land parcels and their approximate capacity at 30dph.

3.0 Delivery: Matters of Agreement or Disagreement

- 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 Lane / Redlynch Lane¹).
- 3.2 Bloor Homes state that the site is deliverable.

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 2013	<ul style="list-style-type: none"> • BNES/47 • 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 • 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

¹ SHLAA assessment should actually read K17 a-f.

	<p>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>
<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>Further evidence: Informs B&NES response to Nov 2013 consultation reps</p>	<ul style="list-style-type: none"> • CH2M Hill Transport Modelling (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 Documents produced and submitted on behalf of Bloor Homes in support of land at South West Keynsham – these documents support both the 200 dwellings allocated through the Schedule of Core Strategy Amendments (Nov 2013) and the enlarged site
- Sustainability Appraisal – December 2011(Pegasus)
 - Landscape and Visual Assessment (including Capacity Assessment) December 2013 (Cooper Partnership)

- Transport Assessment(including evaluation to support the core strategy and transport strategy for the land south west Keynsham – December 2013(FMW Partnership)
- Revised Concept Plan - December 2013 (Pegasus)

5.0 Summary of Agreed Matters

5.1 The following are matters agreed between the parties (the first four bullet points were agreed in the previous Statement of Common Ground for the Examination on 13th December 2011):

- The site is currently open land.
- The site is currently designated as Green Belt in the B&NES adopted Local Plan.
- The Site was promoted by Bloor Homes in the SHLAA (CD4/H13) and comprises SHLAA site numbers K17 a, c, d, e and f.
- The site falls within a previously identified Area of Search 1F for an urban extension to Keynsham in the Draft RSS Secretary of State's Proposed Changes (CD3/6). The Draft RSS proposed a '360 degree' Area of Search around Keynsham to reflect the need for further work to determine the most appropriate direction(s) for growth. The Draft RSS was never adopted, and its predecessor (RPG10) was revoked in May 2013.
- Part of the site between Charlton Road and Parkhouse Lane is proposed to be removed from the Green Belt in the Schedule of Core Strategy Amendments November 2013 (see Policy KE4)
- The proposed allocation included in Policy KE4 was assessed as part of a wider Transport Evaluation Report (CD9/12/1-27). The Transport Evaluation Report included a comparison of each of the sites being considered against a number of criteria including potential for sustainable modes of transport, highways impact and potential for mitigation, forecast emissions and road safety. Based on this assessment, the land adjoining South West Keynsham scored averagely for cycling provision, forecast emissions and road safety and poorly for walking, public transport and highway impacts.
- A Transport Access Assessment (CD10/E22) for the South West Keynsham site was carried out in November 2013. The study concluded that direct access should be formed to Charlton Road with a through link formed to site K2A to the north sufficient to enable bus service provision to pass through these sites without turning. Bloor Homes supports direct access to the site off Charlton Road, and also supports in

principle a link to K2a, but states that the latter depends on what is proposed for K2a.

- The conclusions of CD9/LV/1 are agreed. Development of the site would be low risk to the significance of known heritage assets within the central fields, and medium risk within the western and eastern edges due to the potential effects on Queen Charlton Conservation Area, Keynsham Dapps Hill Conservation Area and historic buildings at Chewton Place.

6.0 Summary of Matters in Dispute

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

- Whilst supporting the allocation of 200 dwellings, Bloor Homes consider that there is a need for a larger site to be removed from the Green Belt at South West Keynsham to meet housing needs and in order to safeguard land for development in accordance with the NPPF, in particular at para 83 which states that:- “... *Once established Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.*”
- Para 85 of the NPPF states that, “When defining boundaries, local planning authorities should:
 - *Where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer term development needs stretching well beyond the plan period;*
 - *Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period.*”
- Bloor Homes consider that the Land at South West Keynsham has the potential to accommodate a greater number of dwellings than the 200 identified in the Schedule of Amendments (November 2013).
- Bloor Homes consider that the release of Green Belt in the south west of Keynsham should be greater in order to safeguard land to meet longer term development needs stretching well beyond the Plan period. Such an approach is consistent with national policy in the NPPF para 85. There is also a need for Local Plans to take account of longer term requirements, and to be kept up to date. NPPF para 157. Bloor Homes consider that if housing delivery indicates a shortfall in provision, the additional area of land should come forward in the short to medium term in meet housing needs and maintain a 5 year housing land supply, rather than development being dispersed throughout the district.

- Bloor Homes disagree with BANES conclusion in the SHLAA that the sustainability credentials of the site area are low. A Sustainability Appraisal was prepared by Pegasus in December 2011 and submitted to the Council along with representations on the Plan. Bloor Homes believes that the SA demonstrated the sustainability credentials of the site and provided an assessment of the opportunities and constraints. Further work on transport has been undertaken by FMW Consultancy on behalf of Bloor Homes. The Council disagrees and believes that the conclusions of the SHLAA are consistent with the evidence base, including the Councils Sustainability Appraisal (which includes **CD10/A1/3**).
- Bloor Homes disagree with assessment in the SHLAA (Nov 2013) and the conclusions that are inferred to in the Arup Report. (March 2013)
*“The Report concludes that it is inappropriate to develop the whole area (particularly the land to the extreme east and west) due to a range of issues related to landscape visual impact and highways. Three Options are presented for consideration.
Option 1 (pp24-25) presents a net housing quantum of 770
Option 2 (pp26-27) presents a net housing quantum of 560
Option 3 (pp28-29) presents a net housing quantum of 315, although this also includes K18. For areas K17a-c only (Arup cells A1-A3 and most of B) the net housing quantum was 255.
• The report recommends that development should be clustered at the western and northern areas of the site. Development plots should be offset from Redlynch Lane. A large part of this area site is suitable for development based on the analysis by Arup and subject to a number of issues/constraints being resolved. However the suitability credentials are low to very low.” Page 11 of the SHLAA Nov 2013*

Bloor Homes recognise that the Arup Development Concept Options Report (March 2013) does not make any site selection recommendations or draw any conclusions; rather it tests different development scenarios as set out in the 3 Options. The report sets out the opportunities and constraints to development in the area of K2 and comments on the viability and deliverability of development south of K2, providing a set of place making principles for development south of K2 – which include the point that “the site layout should allow for the extension of the development site should Keynsham need to expand in the future.”

- The Arup Report “South of K2 Development Concept Options Report” suggests three concept options for development at south-west Keynsham. Options 1 and 2 show development potential to the south of Parkhouse Lane. Option 3 more closely resembles the proposed Core Strategy allocation for 200 dwellings and keeps development to the north of Parkhouse Lane. The Arup Report (para 4.4) states that Option 3 is a more conservative approach more led by considerations of landscape impact which has significantly fewer issues than Options 1 and 2 on landscape character, and fits with the prevailing development line. The Site Opportunities section of the report states that “The allocation of the K2

sites for residential development means that a precedent is set of development south of the existing settlement boundary. Development of the land up to Redlynch Lane would bring the settlement boundary south, broadly in line with the area to the east of Chew Valley.” Para 1.1 clarifies the status of the Concept Options Reports, i.e. that the assessments are used to help consider the various locations for development, are not in themselves policy, and that by publishing them the Council is not agreeing to the development capacities identified. Subsequent to the Arup Concept Options Report further work has been undertaken by the Council exploring the impacts of development in this location (see evidence referred to in section 4 above).

- The Arup Report referred to above states that *“the demand and supply of residential land area finely balanced across the West of England. An upturn in activity would see a land shortage with consequent upward pressure on land values across BANES as a whole.”* Since publication of the Arup Report, the Council has proposed changes to the Core Strategy to increase the overall housing number to ‘around 13,000’, and to remove sites from the Green Belt for residential development. The Inspector in ID/44 confirmed that he had not been persuaded by participants that the overall housing provision in the Plan needs to be greater than the around 13,000 homes as now proposed by the Council. The Inspector has stated that the hearings should proceed on the assumption that 13,000 homes is either about right or should be lower.(para 2.4) However in the preceding paragraphs 2.2 he states that *“I am not intending to publish any detailed interim conclusions on the SHMA/housing requirement other than these brief comments....I cannot come to any firm conclusions at present as I have yet to consider (and hear) any representations made in response to the November 2013 consultation on proposed changes, such as CSA14 which refer to the housing requirement and its make up.”*
- BANES 47 dated 13th September 2013 para 5.20 stated that in light of the fact that the Arup Concept Options work indicates that there may be scope for a greater level of development and because of the conclusions of the green belt assessment; the Council concluded that there may be scope to identify safeguarded land at south-west Keynsham in the Placemaking Plan. The Council concluded in Paras 5.12 to 5.29 that it was however more appropriate to address this issue in conjunction with the other West of England authorities as part of the planned review.
- The Council’s position on safeguarded land was updated in B&NES 51. Para 3.5 states that the Council had given the matter of safeguarded land further consideration as part of the allocation of Green Belt sites within the Core Strategy. Safeguarded land is identified east of Keynsham; but not at south west Keynsham (para 3.58).
- Bloor Homes disagree with the Council’s statement *“That the site allocation of land at KE4 uses all the suitable development land and the configuration of the Green Belt boundaries does not lend itself to*

identifying safeguarded land. Moreover, safeguarded land at Keynsham is already identified at East Keynsham.”

Placemaking Principles in Policy KE4

- The Arup Concept Options Report (**CD9/CO5**) recommends a density of between 35-40dph. Bloor Homes disagree and believe that density should vary across the site – a more appropriate density on the edge of settlement would be 30 dph as opposed to 35 dph.
- Bloor Homes disagree that Parkhouse Lane should form the boundary of the site.
- Bloor Homes believes that a larger number of dwellings can be accommodated by extending the site in a southerly direction.
- Bloor Homes believe that the Landscape Critique submitted with their representations supports their argument of extending the site in a southerly direction. The Landscape Critique suggests that a landscape buffer can be established within a larger site. Bloor Homes consider that there is no practical difference in terms of the landscape character between the approved and allocated sites. There is no reason why the plateau should be rejected as a strategic development site. As the Landscape Critique concludes, issues of detail should be dealt with at a more detailed stage.
- Bloor Homes consider that the allocation of the plateau as a strategic site would allow for good long term planning, which is in accordance with the designation of new green belt boundaries in the NPPF.
- The Councils published evidence (**CD9/LV/8**) disagrees with this conclusion. **CD9/LV/8** concludes that development of any land within the site would have a high negative impact ‘combined significance score’. Para 2.2 states that areas scoring high negative significance are those where development is considered inappropriate in terms of impacts on landscape and visual factors; development is unlikely to be able to be mitigated to effectively improve its acceptability in these areas. The conclusions of **CD9/LV/8** were partially amended in **CD10/E13** which showed that a modified layout of land to the north of Parkhouse Lane would significantly decrease the negative effects of development; the assessment of land to the south of Parkhouse Lane remains the Councils position.
- Bloor Homes believes that the issue of safeguarding land should be included in Policy KE4.
- Bloor Homes believes that the obligation to provide 20% renewable energy should be removed 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 Council disagrees and

believes that CD10/E16 provides the justification for the proposed wording.

- With maximum development on the site, Bloor Homes would be willing to fund junction improvements at the A37/ Queen Charlton Lane and Bristol Road/ St. Ladoc Road/ Trescothick Close. Improvements include junction signalisation with pedestrian crossing facilities which will significantly increase capacity from that currently available. The need for these improvements is already identified in the Schedule of Core Strategy Amendments.
- Pedestrian and cycle connections to K2 and along the eastern side of Charlton Road are proposed as part of the development, which will connect in with proposed provision of pedestrian and cycle routes on Charlton Road as part of K2a development. These would assist and encourage additional trips on foot and by cycle for those travelling to and from the site.
- Bloor Homes considers that the level of highway impact from development at south west Keynsham will be dispersed more widely than that proposed at east Keynsham; trips to Bristol and South Gloucestershire are likely to route via the A37, to Bath via Redlynch Lane, Wellsway or Keynsham town centre. Bloor Homes believe that development at East Keynsham will lead to significantly more traffic using the A4 towards these key employment areas.
- Bloor Homes consider that the close proximity of development at East Keynsham to the A4 is also more likely to incentivise residents in to using their cars to travel to work even though there are existing bus services along this route. This is evidenced by the car trip generation data for Keynsham East Ward compared to Keynsham South Ward. Therefore, modal shift away from the car towards public transport would be significantly greater from development at south west Keynsham than for east Keynsham. The Council disagrees with this assessment.
- Bloor Homes consider that development at south west Keynsham will produce less CO2 emissions per dwelling than development at east Keynsham. This is particularly important to Keynsham as the town centre is an AQMA.
- Further transport modelling has been undertaken by the Council using a micro-simulation transportation Paramics model of Keynsham. The results of this modelling will be made available on 14th February 2014. The initial results of the modelling indicate that up to 1,000 dwellings would result in severe congestion and delay on the transport network. Bloor Homes have not seen any draft of this document and await its publication so that discussions can take place and comments can be submitted. As the modelling is being published alongside the statement of common ground, further discussions will take place during the lead up to the hearings to identify further areas of agreement or disagreement between the parties to

provide the Inspector with clarity and inform his framework for the Hearings.

- Bloor Homes consider that urban extensions are required in B&NES not only to accommodate its own housing needs, but also the needs that could not be accommodated in Bristol City Council area.(paragraph 52 of the Bristol Core Strategy Inspector's Report March 2010). The Council disagrees. The issue of potential unmet housing need arising from Bristol City Council has already been discussed at the Examination. Whilst the Inspector has stated that he will not explore housing needs in the adjoining greater Bristol HMA (para 13 of ID39) and he has indicated in ID44 para 2.2 that he was not intending to publish any detailed interim conclusions on the SHMA/housing requirement other than those set out in ID44. Bloor Homes consider that the urban extension is required to meet the housing needs in BANES in this plan period and to provide flexibility so as to ensure housing delivery and a 5 year housing land supply is achieved. Bloor Homes believes that irrespective of any agreement on the scale of Bristol's housing needs, it is inevitable that there will be some of Bristol's needs being met in BANES as those needs cannot be met entirely in Bristol; land should therefore be safeguarded in accordance with the NPPF para 85 to meet longer term development needs.

7.0 Declaration

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

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

