

**Statement of Common Ground**

**B&NES Core Strategy – Alternative Green Belt  
Site at Broadmead Peninsula, Keynsham**

**Built4Life Limited on behalf of The River Regeneration Trust,  
c/o Broadmead & Avon Valley Partnership  
and  
Bath & North East Somerset Council**

**12<sup>th</sup> February 2014**

## 1.0 Introduction

- 1.1 In his note of 3<sup>rd</sup> 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 14<sup>th</sup> February 2014; the Council has a working deadline of **7<sup>th</sup> 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 alternative proposal.

## 2.0 Description of the site

- 2.1 The Broadmead Peninsula site comprises approximately 105 hectares (260 acres) of land that incorporates Broadmead Industrial Estate, Wessex Water sewage treatment works, B&NES Council landfill site, Avon Valley Farm, Avon Valley Adventure & Wildlife Park, Bendalls Farm, DS Smith Recycling and some smaller land interests. The map included in appendix 1 details the red line boundary of the site; land within this boundary that is in control of The River Regeneration Trust / Broadmead & Avon Valley Partnership is detailed in orange.
- 2.2 The site is located to the north east of Keynsham, east of Somerdale, and north west of Saltford. It is adjacent to the River Avon and main railway line and close to local highway routes. It is bounded by the River Avon to the north, railway to the south, river to the west and the national main gas pipeline to the east.
- 2.3 The site lies within the Avon Valley Landscape Character Area as defined in the Rural Landscapes of Bath and North East Somerset Landscape Character Assessment SPD.
- 2.4 The land in this area is mainly comprised of arable fields and improved or semi-improved grassland. The land is predominantly level, with a sharp descent to the north near the banks of the River Avon. The site is set within an open flood plain landscape of the River Avon.
- 2.5 The majority of the site is undeveloped save for the sewage works, landfill site, Broadmead Industrial Estate, Avon Valley Farm with 30+ employment units and the Avon Valley Adventure & Wildlife Park with associated attractions and infrastructure.
- 2.6 C.35ha of the site is located within Flood Zone 3 where there is a high probability of flooding. An additional c.14ha of land is located within Flood Zone 2 where there is a medium probability of flooding. The remainder of the site (c.56ha) which is mostly under the control of The River Regeneration Trust / Broadmead & Avon Valley Partnership is located within Flood Zone 1 where there is low probability of flooding as defined in the NPPF and NPPG.
- 2.7 The River Avon is an SNCI. The SNCI Broad Mead field lies entirely within the site along Stidham Lane but outside of the development area proposed by The River Regeneration Trust / Broadmead & Avon Valley Partnership.
- 2.8 Access to the majority of the site is currently from the south and is restricted to a narrow Grade II Listed bridge on Pixash Lane, and two narrow under-bridges at Broadmead Lane and Unity Road. Access to the DS Smith site is from Avon Mill Lane to the west.
- 2.9 A public right of way runs through the east of the site close to Avon Valley Farm.

### 3.0 Delivery

- 3.1 The majority of the land shown within the red line boundary in appendix 1 is included in the SHLAA as available with low/moderate ‘suitability credentials’ (SHLAA, November 2013 – CD10/E19 Appendix 1c – **Location K29** Avon Valley Farm) and available with low ‘suitability credentials’ (SHLAA, November 2013 – CD10/E19 Appendix 1c – **Location K30** North of Ashmead Road).
- 3.2 The River Regeneration Trust Scoping Study Report (**CD10/LD3a**) estimates that the site has a maximum capacity of 731 dwellings and that housing delivery could commence on site in 2015/16, delivering 65 dwellings during that financial year, rising to a maximum of 84 dwellings in 2017/18 (see summary table below). Delivery is estimated to be on-going until 2025/26 over three phases, with an average delivery of 66 dwellings per year over the 11 year delivery period. The Scoping Study estimates that 304 dwellings from the site would contribute to the 5 year housing supply between 2014/15 and 2018/19.

Year Housing Supply Period from 13/1														
KEYNSHAM	Total	13/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26
<i>Proposed Green Belt Development</i>		5 Year Housing Supply Period from 15/16												
East of Keynsham A1-A3 (TRRT)	731			65	75	80	84	54	52	70	70	70	70	41
East of Keynsham A1-A3 Mkt	468			42	48	51	54	35	33	45	45	45	45	26
East of Keynsham A1-A3 Aff	263			23	27	29	30	19	19	25	25	25	25	15
Total Cumulative Delivery				65	140	220	304	358	410	480	550	620	690	731
Project Phases				Phase 1			Phase 2			Phase 3				

- 3.3 The Trust states that the forecast for delivery is viable and deliverable.
- 3.4 The delivery rate is higher than the SHLAA (**CD10/E19**) estimate for the proposed Green Belt site allocations at Keynsham (it estimates a maximum of 50 dwellings delivered per annum for the proposed allocations at East and South West Keynsham). The Trust’s projections include 80 houseboats. The Trust state that these would be built to passive design and mostly allocated for first time buyers, essential factory workers, manufacture-to-build/live, low impact alternative lifestyles and boat dwellers who are a growing concern in B&NES.
- 3.5 The Trust have supplied details of proposed housing numbers, an estimation of jobs created and employment floorspace for three options detailed within the Scoping Study **CD10/LD3a** (options A-C). These are succinctly reproduced in the three tables below:

Broadmead Peninsula 2013-2029	Number of Houses		
Housing Type	Option A	Option B	Option C
Semi-detached or Detached	390	400	430
1-bed Flats	63	95	45
2-bed Flats	198	139	144
Houseboats	80	80	80
<b>TOTAL</b>	<b>731</b>	<b>714</b>	<b>699</b>

Broadmead Peninsula 2013-2029	Employment Floorspace m <sup>2</sup>		
Land Use Type	Option A	Option B	Option C
Housing (C3)	81,793	78,145	78,478
Offices (B1)	52,338	52,735	66,953
Industry (B2 & B8)	27,485	17,220	23,544
Shops & Hotels	12,077	18,313	12,158
Health & Education	12,687	7,993	7,993
Leisure	1,478	1,478	2,884
Open Space, Marina & Wetland	214,898	151,237	186,124
Rail Sidings	0	17,857	5,687
Waste Facilities	0	45,499	5,646
<b>TOTAL</b>	<b>402,756</b>	<b>390,477</b>	<b>389,467</b>

3.6 The Scoping Study (CD10/LD3a) suggests transport solutions to enable delivery which are summarised below:

Phase	Transport Strategy
Phase 1	Make best use of existing infrastructure
Phase 2	New road link (for HGVs) from Avon Mill Lane with sustainable linkages
Phase 3	New road over rail line and bus loop

## 4.0 Key relevant evidence

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

Key evidence 2011-2012	<ul style="list-style-type: none"> <li>• Previous iterations of SHLAA</li> <li>• Green Spaces Strategy CD4/ENV3</li> </ul> <p><b>NB Much of the earlier Core Strategy evidence is in part superseded by more detailed evidence prepared to support the allocations as outlined below.</b></p>
Additional evidence to support proposed	<ul style="list-style-type: none"> <li>• East Keynsham Development Concept Options Report CD9/CO2</li> <li>• Core Strategy Additional Evidence Heritage Asset Study CD9/LV/1 Main Report, Appendix 6 and Appendix 7</li> </ul>

<p>changes</p> <p>Submitted March -Sept 2013</p>	<ul style="list-style-type: none"> <li>• Keynsham East Landscape and Visual Impact Assessment <b>CD9/LV/7</b></li> <li>• Green Belt Review Stage 1 <b>CD9/E2</b></li> <li>• Green Belt Review Stage 2 <b>CD9/E9</b></li> <li>• Preliminary Ecological Surveys and Assessment – Keynsham East (North of Railway) <b>CD9/E10</b></li> <li>• Affordable Housing Viability Study <b>CD9/H1</b></li> <li>• Flood Risk: The Sequential and Exception Tests Update <b>CD9/FR3</b></li> <li>• Infrastructure Delivery Plan <b>CD9/I1</b></li> <li>• Transport Evaluation Report Main Report <b>CD9/I2/1</b>; and appendices including Appendix E Land Adjoining East Keynsham and Appendix EE: Scenario 2 – RTA calculations <b>CD9/I2/6</b>; Appendix K: Accession Maps: Walking and Cycling <b>CD9/I2/12</b>; Appendix L: Accession Maps: Public Transport <b>CD9/I2/13</b>; Appendix N: Ward Model Share &amp; Ward Maps <b>CD9/I2/15</b></li> </ul>
<p>Documents associated with the Core Strategy strategic site allocation</p> <p>Submitted Nov 2013</p>	<ul style="list-style-type: none"> <li>• Preliminary Arboricultural Assessment – East Keynsham <b>CD10/E6</b></li> <li>• Bath and North East Somerset – Community Infrastructure Levy: Strategic greenfield allocations – viability testing <b>CD10/E7</b></li> <li>• Renewable Energy Assessment for B&amp;NES Green Belt sites: Assessment <b>CD10/E16</b></li> <li>• Valuing people, place and nature – a Green Infrastructure Strategy for B&amp;NES <b>CD10/E17</b></li> <li>• Strategic Housing Land Availability Assessment (SHLAA) <b>CD10/E19</b></li> <li>• Extract B&amp;NES Playing Pitch Strategy <b>CD10/E20</b></li> <li>• B&amp;NES Local Education Authority – Education Requirements for the sites <b>CD10/E21</b></li> <li>• Highway Assessment of East of Keynsham Site A1-A3, north of railway line <b>CD10/E23</b></li> <li>• B&amp;NES 51</li> </ul>
<p>Further evidence: Informs B&amp;NES response to Nov 2013 consultation reps</p>	<ul style="list-style-type: none"> <li>• CH2M Hill Transport Modelling (forthcoming)</li> <li>• Need and Potential for Employment Land Provision (forthcoming)</li> </ul>
<p>Assessments</p>	<ul style="list-style-type: none"> <li>• Sustainability Appraisal Annex L – Locational Alternative Appraisal Matrices <b>CD9/A1/5</b></li> <li>• Sustainability Appraisal Matrices (Annex O) <b>CD10/A1/3</b></li> <li>• Previous iterations of the SA</li> </ul>

4.2 The River Regeneration Trust / Broadmead & Avon Valley Partnership representing the landowners has prepared a number of reports and submissions during the course of the development of the Core Strategy in support of their representations on the Core Strategy including Draft Core Strategy (February 2011), the proposed changes to the Core Strategy (published for consultation March 2013), amendments to the Core Strategy (published for consultation November 2013) and submissions for the SHLAA. Key evidence is summarised below:

Key landowner evidence	<ul style="list-style-type: none"> <li>• Representation to B&amp;NES Core Strategy &amp; Executive Summary Avon Valley Marine Park – <b>February 2011</b></li> <li>• Representation to B&amp;NES Core Strategy &amp; Executive Summary Broadmead Lane Properties – <b>February 2011</b></li> <li>• BANES Strategic Land Availability Assessment for Housing and Economic Development: Stage One/Two Submission for Avon Valley Waterside Park – <b>16<sup>th</sup> November 2012</b></li> <li>• Avon Valley Farm – <b>Eighteen</b> Responses to the Core Strategy Schedule of Changes consultation in <b>February 2013</b>, which included the following SPCs = SPC9/14/16/19/22/24/109/111/112/113/118/119/1245/150/155/167/170/172</li> <li>• Avon Valley Farm Access Map, also submitted during the Core Strategy Schedule of Changes Hearing in <b>May 2013</b></li> <li>• Availability and Deliverability of Housing in A1-A3 report on <b>22<sup>nd</sup> September 2013</b></li> <li>• Overall and Phase 1 summaries for each of Options A-C including Job number calculations hand-delivered during the meeting on <b>21<sup>st</sup> October 2013</b></li> <li>• Sections of the Draft Broadmead Peninsula Scoping Study (Executive Summary, Transport section, Green belt extract and Circular Economy extract) on <b>30<sup>th</sup> October 2013</b></li> <li>• Broadmead Peninsula Economic Regeneration and Land Improvement Scheme Scoping Study for B&amp;NES – <b>20<sup>th</sup> November 2013 CD10/LD3a</b></li> <li>• The River Regeneration Trust - CSA 32 on <b>17<sup>th</sup> December 2013</b></li> <li>• The River Regeneration Trust - CSA 35 on <b>17<sup>th</sup> December 2013</b></li> <li>• The River Regeneration Trust - CSA 36 on <b>17<sup>th</sup> December 2013</b></li> </ul>
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## 5.0 Summary of Agreed Matters

5.1 The following are matters agreed between the parties:

- 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 principle of removing additional land to the East of Keynsham from the Green Belt and safeguarding for future development is supported.
- The principle of providing around 30,000sqm of employment floorspace within Use Classes B1 (b) and (c), B2 and B8 is considered deliverable and is supported.
- The principle of development incorporating an element of traditional materials including natural stone 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 Trust would also agree to the policy requiring straw bale and higher recycled content materials using modern methods of construction to be incorporated into development.
- The principle of retaining and enhancing public rights of way is supported.
- It is agreed that the Stage 2 Green Belt Review (**CD9/E9**) concludes that development of the site would cause harm to the following national Green Belt purposes: purpose 1 (checking unrestricted sprawl of large built-up areas); purpose 2 (preventing neighbouring towns merging into one another); purpose 3 (safeguarding countryside from encroachment); and local purpose 6 (protecting the identity and setting of villages).
- It is agreed that the Arup Transport Evaluation Report (**CD9/I2/6**) enabled a high level assessment of different locations in terms of opportunities to promote sustainable transport and potential highway impacts associated with development. It is agreed that the East of Keynsham area was assessed as being an 'average performing location'.
- In order to provide a more detailed assessment it is agreed (consistent with the comments of **CD10/E23**) that further detailed modelling is required to supplement the Arup Transport Evaluation Report to fully assess the capacity of the highway network to accommodate development in this area. 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 14<sup>th</sup> February 2014. The initial results of the modelling indicate that up to 800 dwellings would result in severe congestion and delay on the transport network. 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.
- It is agreed that the Arup Concept Options Report states that the Great Western Main Line is a significant barrier to access (**CD9/CO2** page 17).



- It is agreed that the Arup Transport Evaluation Report (**CD9/I2/6**) states that access to the site is restricted by the presence of the railway line and that existing crossings have limited capacity; improvements to these or the installation of new crossings would be needed in order to facilitate development.
- It is agreed that Pixash Lane Bridge is grade II Listed.
- It is agreed that the NPPF (para 132) states that when considering the impact of a proposed development on the significance of a designated asset, great weight should be given to the asset's conservation. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional.
- It is agreed that the Broadmead Peninsula Scoping Study (**CD10/LD3a**) does not include an assessment of the impact of the development proposals on the significance of the heritage asset or its setting
- It is agreed that the LUC study (**CD9/LV/1**) states that any proposed alterations to the listed Pixash Lane Bridge would pose a high risk to its heritage significance.
- It is agreed that the Broadmead Peninsula Scoping Study (**CD10/LD3a**) proposes to clear the grass verges on the bridge and provide a highway and walk-way on one side, together with introducing traffic signals at either end of Pixash Bridge in phase 1. Phase 3 proposes to build a higher capacity road bridge crossing over the railway towards the east of the site; either an upgrade of the current bridge or a new bridge in the vicinity of the current one are options considered within the Scoping Study. The impact of these proposals on the significance of the heritage asset or its setting has not been assessed,
  - It is agreed that the railway line is planned for electrification in the future by Network Rail. This separate project will also need to assess the impact of the electrification proposals on the significance of the heritage asset and its setting. This assessment has not yet taken place. It is understood that Network Rail has appointed heritage specialists to advise them on the project.
- It is agreed that the Landscape and Visual Impact Assessment (**CD9/LV/7**) concludes that development of land within the site would have a high negative impact 'combined significance score' (except for field A1.2 which was assessed as having a medium impact). 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.

- It is agreed that the Landscape and Visual Impact Assessment (CD9/LV/7) was undertaken in accordance with the Guide to landscape and Visual Impact Assessment 3<sup>rd</sup> Edition. The assessment is necessarily general given the hypothetical nature of development at this stage. The assessment assessed residential development, and assumes a hypothetical 2 Storey, medium to high density housing development in order to gauge development effects. The Broadmead Peninsula Scoping Study (CD10/LD3a) and the River Corridor Group Report Appendix A (**Number to be allocated by B&NES**) proposes a marina with houseboats, offices, industry, waste facilities, shops/hotels, constructed wetland, water ecology park, early learning aquatic centre and open woodland as part of the ecological enhancement programme for the development as well as ‘2 Storey, medium to high density housing development’.
- It is agreed that the national high pressure gas pipeline constrains development to the east. The regulations permit residential development within the outer zone (155m either side of the pipeline) and employment land and playing fields within the outer and middle zones (125m either side of the pipeline). All three development Options (A-C) included in the Broadmead Scoping Study (CD10/LD3a) are outside of the gas pipeline zones, save for green infrastructure proposals.
- It is agreed that the provision of appropriate facilities for outdoor recreation are appropriate within the Green Belt as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it, as per para 89 of the NPPF.

## 6.0 Summary of Matters in Dispute

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

- The River Regeneration Trust / Broadmead & Avon Valley Partnership representing the landowners disagrees with the conclusions of the B&NES Sustainability Appraisal; believes that land at the Broadmead Peninsula is the most sustainable site for residential and economic development; and believes that land at the Broadmead Peninsula should be removed from the Green Belt and allocated for development / safeguarded for future development instead of the proposed allocation east of Keynsham south of the railway line.
- The River Regeneration Trust / Broadmead & Avon Valley Partnership representing the landowners believe that the Broadmead Peninsula site was not given a fair consideration in the Sustainability Appraisal (CD10/A1/3). In particular the landowner believes that the SA did not take into consideration the submitted ‘Avon Valley Farm Access Map’,

‘Availability and Deliverability of Housing in A1-A3’ report, ‘Overall and Phase 1 Summaries for Options A-C’ report, or ‘Draft Broadmead Peninsula Scoping Study Executive Summary’, Draft Broadmead Peninsula Scoping Study Transport section, Draft Broadmead Peninsula Scoping Study Green Belt section, and Draft Broadmead Peninsula Scoping Study Circular Economy section reports.

- The River Regeneration Trust / Broadmead & Avon Valley Partnership representing the landowners believes that development of the site proposed by the Council for allocation in Policy KE3A would have a significantly greater impact on the Green Belt than development of the Broadmead Peninsula site. The Council disagrees and believes that this view is inconsistent with the evidence published in the Stage 2 Green Belt Review (CD9/E9).

## 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 The River Regeneration Trust, c/o Broadmead & Avon Valley Partnership:**



**James Hurley**

**Position: Director, Built4Life**

**Date: 12<sup>th</sup> February 2014**

**And**

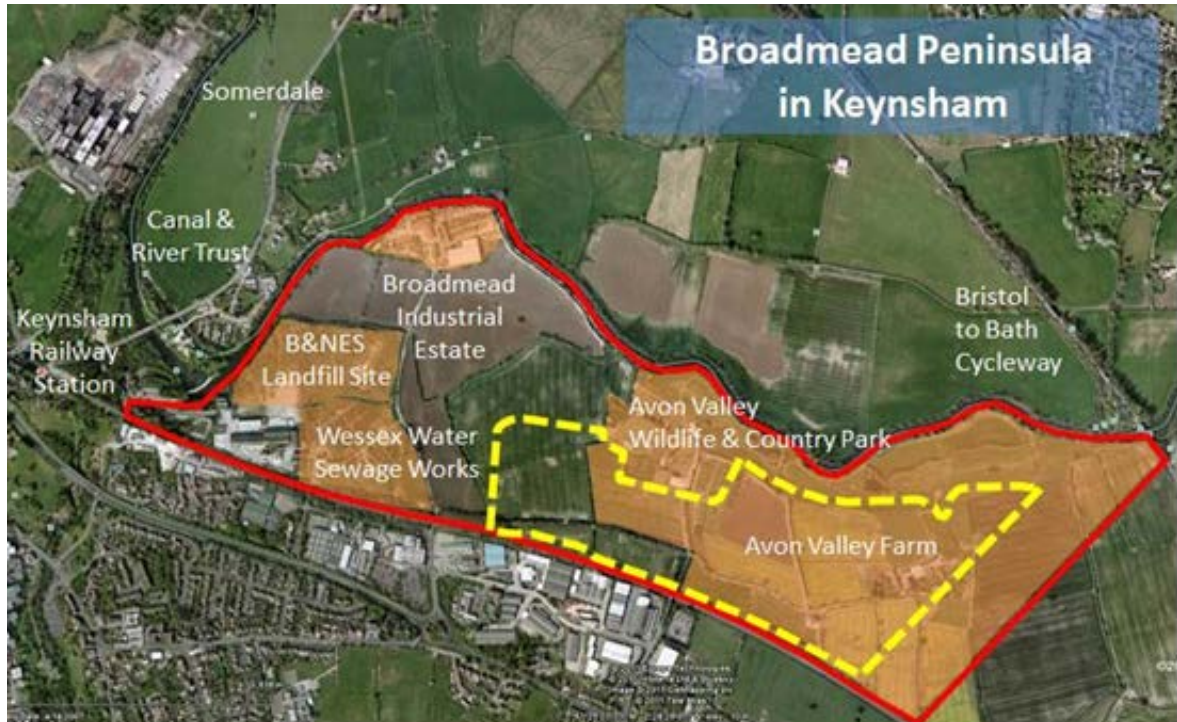
**Signed on behalf of Bath & North East Somerset Council:**



**Position: Planning Policy Team Leader**

**Date: 13/02/14**

Appendix 1: Site Plan



*Broadmead Peninsula boundary in red line – details in the Broadmead Peninsula Economic Regeneration and Land Improvement Scheme Scoping Study (CD10/LD3a)*