

Statement of Common Ground

B&NES Core Strategy – Alternative Strategic Site  
Land at Lays Farm, Keynsham

DLP Consultants on behalf of Redrow Homes South West  
and  
Bath & North East Somerset Council

17<sup>th</sup> February 2014

## 1.0 Introduction

- 1.1 In his note of 3<sup>rd</sup> January 2014 ([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 that 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. **Accordingly, this Statement of Common Ground relates to an alternative proposal i.e. land at Lays Farm Keynsham, as outlined in red on the plan attached at Appendix 1.**

1.7 Insofar as the Bath and North East Somerset Schedule of Core Strategy Amendments November 2013 is concerned, it is referred to at Annex 3 (page 70) as an 'Alternative Strategic Site Allocation considered' and is referenced as follows:

- Change Ref: KM3
- Location: Land adjoining South West Keynsham (including land at Lays Farm)

1.8 A plan is included at page 75 of Annex 3 to the Council's November 2013 Amendments. This shows part of the site which is the subject of this SoCG outlined in red and associated with 50 dwellings.

## 2.0 Description of the site

2.1 The Site is located to the south west of Keynsham and is situated to the west of Charlton Road as it enters Keynsham from the south. It is bound on two sides by existing development.

2.2 The site itself extends to approximately 7.8 hectares and is currently in agricultural use; it being grazed by sheep.

2.3 It is located approximately 1.5km south west of Keynsham Town Centre. The nearest convenience stores are located some 580 metres walking distance to the north east on Queens Road, while the nearest Primary School (Castle Primary School) is situated some 650 metres due east.

2.4 There is a bus stop on Charlton Road directly adjacent the site with regular half hourly bus services (338) to Bristol and Bath. In addition to this there are a further four services which run past the site: 177 Radstock to Bristol; 349 Keynsham to Bristol; 640 Keynsham to Bishops Sutton; and the 665 Keynsham to Saltford.

2.5 The site frontage is within the existing 30 mph speed limit on Charlton Road. The speed limit changes to the national speed limit just south of the site. There are traffic calming measures located mid-way along the frontage of the site in the form of a chicane.

2.6 The land between Keynsham and Bristol, including the site under consideration here at Lays Farm, is currently designated as Green Belt in the BANES Local Plan. The Green Belt boundary currently runs along the west side of Charlton Road, with the Stockwood, some 1.6 km to the west, forming Bristol's easternmost edge.

2.7 The village of Queen Charlton is situated approximately 400m to the south west. The village is washed over by Green Belt and has been designated a conservation area.

- 2.8 The Site sits at an elevation of 72.5m AOD to 59.5m AOD. A central north-south aligned broad shallow ridge runs approximately along the line of the post and wire fence in the larger western field between 72.5 and approximately 69m AOD. The land then falls away gently towards the western field boundary and beyond down into Charlton valley facing towards Stockwood; and falls to the east initially gently towards the hedgeline separating the western and eastern field and then more steeply in the eastern field down to the eastern boundary with Charlton Road facing towards Keynsham. This is illustrated in Figure 2 of the Richards Partnership Landscape and Visual Appraisal.
- 2.9 The Site's primary visual relationship to the west is with the Charlton Valley and Stockwood; the role the site plays in the skyline being dependent upon the elevation of the viewpoint and intervening vegetation. Its visual relationship to the east is with Keynsham.
- 2.10 The Site sits within the LCA5 'Dundry Plateau' of the Rural Landscape of Bath and North East Somerset, a rural Landscape Character Assessment and has an 'open' character, typical of this area.
- 2.11 The Landscape and Visual Appraisal undertaken by the Richards Partnership on behalf of Redrow Homes in December 2013 (and submitted in support of its representations on the Proposed Core Strategy Amendments November 2013) showed that the site is visible from several locations to the west, extending southwards on the skyline from Lays Farm Industrial Estate, but within the context of existing built form to the north (which includes Lays Farm Industrial Estate).
- 2.12 The site is currently divided into two fields, albeit maps show that it would previously have been made up of four and the line of an old field boundary is marked by a collapsed post and wire fence. The larger field occupies approximately three quarters of the site and is located on the highest ground to the west. The remaining field is defined by a mature hedge and is located on rising ground adjacent to the Charlton Road.
- 2.13 Both fields are currently given over to pasture, with a small area adjacent to Lays Farm Industrial Estate given over to palettes, a caravan, bales and other farmyard paraphernalia (see Lays Farm Landscape and Visual Appraisal Page 5: Photographs 1 & 2).
- 2.14 The site's northern boundary is formed by a post and rail fence beyond which lies the access road to the Lays Farm Industrial Estate. The industrial estate occupies the area of land immediately to the north and forms an incongruous element in the wider area, being made up of a series of sheds and large containers. Adjacent to this are a number of residential properties orientated towards the site including, Lays Farm itself. A small cluster of mature trees, including several pines, are located on this boundary; they form a prominent feature in the wider landscape.

- 2.15 The site's eastern boundary is formed by the Charlton Road and is populated by a mature native hedgerow, which largely filters views into the Site from the road and the residential properties to the east.
- 2.16 The southern boundary is formed by a post and wire fence, beyond which is a well-used public footpath linking to the village of Queen Charlton, which lies to the south west. A mature, managed hedge is situated immediately beyond the footpath.
- 2.17 The site's western boundary is formed by a mature, native and largely unmanaged, hedgerow, within which there are a number of gaps allowing filtered views towards the landscape to the west. Beyond which the ground begins to slope steeply towards a small stream running along the Charlton Valley.
- 2.18 Other than the boundary hedgerows the only landscape feature on the site is the managed hedgerow dividing the two fields, which has a small row of trees at its northern end.
- 2.19 There is no public access onto the Site itself.
- 2.20 A high pressure gas main runs across the Site about 1.2m below ground level in an approximate north south direction.
- 2.21 Arup's West Keynsham Development Concept Options Report (March 2013), which informed the Council's initial conclusions on the scope for development here (i.e. 50 dwellings immediately adjacent Charlton Road), inaccurately placed the gas main further east on the Lays Farm Site, and also presumed a wider easement zone associated with it.
- 2.22 The actual alignment of the pipeline, as confirmed by Wales and West Utilities, is further west and the associated easement is 16 metres (See Land at Lays Farm, Keynsham, Landscape and Visual Appraisal - Figure 2: Existing Site Conditions and Appendix A Letter and Plan from Wales and West Utilities).

### **3.0 Delivery**

- 3.1 As a direct result of: (a) accurately plotting the correct alignment of the high pressure gas main and the associated easement; and (b) undertaking a thorough and detailed landscape and visual appraisal of this site, Redrow Homes South West has concluded that a larger proportion of the site, extending to 4.3 hectares (i.e. just over half of the site) would be capable of residential development.
- 3.2 The site frontage and the proposed access would be within the existing 30 mph speed limit. Matrix Transportation on behalf of Redrow Homes have also demonstrated (attached with their rep) that a development of circa 150

dwellings could be served by either a simple priority junction with Charlton Road, or alternatively a small roundabout, with full visibility splay standard of 90m in both directions.

3.3 B&NES Council issued an EIA screening opinion on 25<sup>th</sup> February 2013 in respect of proposed residential development at this site for up to 150 dwellings. The screening process is primarily aimed at determining whether or not a project requires EIA. It concluded, *inter alia*, that:

- *Whilst the scale of development will require a Transport Assessment to be submitted, to assess the impact of the development on the highway network and to identify the need for any highway works, the provision of up to 150 dwellings at this site is unlikely to cause any major highway issues of anything other than local impact. Furthermore it is not likely to cause any concerns of cumulative impact with neighbouring developments.*
- *The proposed residential development is unlikely to produce any waste other than normal levels of residential type waste or involve the use of any significant natural resources.*
- *The development would not cause any significant pollution or nuisance through noise or odours etc that could not be suitably addressed without the need for an EIA submission.*
- *The proposed development would result in the loss of existing agricultural land, however there is a significant amount of agricultural land beyond the site boundary and the viability of agricultural operations are unlikely to be affected by the loss.*
- *The development would not have a significant impact on any landscapes of historic, cultural or archaeological significance.*
- *The site is not ecologically sensitive so as to generate a requirement for an EIA.*
- *The development would be visible within short range views of the wider landscape but would be viewed against existing development to the south and north and the landscape effect is unlikely to be significant in terms of the EIA regulations.*
- *Due to its existing use it is highly unlikely that there would be any issues of contaminated land that could not be controlled by conditions.*
- *The site is within flood zone 1 therefore there is a low probability of flooding.*
- *It is not considered to have a significant urbanising effect in a previous non-urbanised area.*

- *The potential impact of the development, when consideration is given to its physical scale and location along with characteristics of the surrounding area, the surrounding uses, and the proposed use, is considered to be relatively minor in EIA terms and would be viewed in terms of local impact only.*
- *The proposed development of up to 150 dwellings on this site would not have significant effects on the environment and that an Environmental Statement is not required, since the proposals would not represent EIA development.*

(Ref: Town and Country Planning (Environmental Impact Assessment)(England and Wales) Regulations 2011. Proposed development of up to 150 dwellings at Parcel 0060 Charlton Road, Keynsham – BATHNES Screening Opinion dated 25<sup>th</sup> February 2013)

3.4 The site lies within a single ownership and Redrow Homes South West is able to exercise an option to acquire the site following the grant of outline planning permission.

3.5 Redrow Homes South West could deliver all 150 dwellings within the 5 year period 2015 to 2020. This assumes the following:

- Submission of an application for outline planning permission September 2014
- Outline planning permission granted July 2015 (by the LPA and not the appeal process).
- Reserved Matters approved December 2015.
- Start on site February 2016.
- First legal completion July 2016
- 30 dwellings completed 2016/2017
- 40 completions (one outlet) per annum thereafter up to April 2020.

## 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:

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|--------------|--|
| Key evidence | <ul style="list-style-type: none"><li>• Previous iterations of SHLAA</li><li>• Green Spaces Strategy <b>CD4/ENV3</b></li></ul> |
|--------------|--|

|   |  |
|---|--|
| 2011-2012   | <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>  |
| Additional evidence to support proposed changes<br><br>Submitted March -Sept 2013               | <ul style="list-style-type: none"> <li>• West Keynsham Development Concept Options Report <b>CD9/CO6</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>• 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 H West of Keynsham Evaluation <b>CD9/I2/10</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> |
| Documents associated with the Core Strategy strategic site allocation<br><br>Submitted Nov 2013 | <ul style="list-style-type: none"> <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>• B&amp;NES Local Education Authority – Education Requirements for the sites <b>CD10/E21</b></li> <li>• B&amp;NES 51</li> </ul>  |
| Further evidence: Informs B&NES response to Nov 2013 consultation reps                          | <ul style="list-style-type: none"> <li>• CH2M Hill Transport Modelling (forthcoming)</li> </ul>  |
| Assessments   | <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 Redrow Homes South West has commissioned and submitted the following additional evidence to rebut and complement that hitherto produced by the Council:

- Letter from Wales and West Utilities and associated plan confirming the actual alignment of the high pressure gas main and the associated



easement i.e. some way to the west of that assumed by Arup in reviewing Green Belt and the scope for development at Lays Farm (12.06.2013)

- Plan of potential site access (Matrix Transportation Planning Ltd - 17.10.2013)
- Land at Lays Farm, Keynsham Landscape and Visual Appraisal (The Richards Partnership December 2013)
- Land at Lays Farm, Landscape Development Strategy (The Richards Partnership December 2013)
- Illustrative Master Plan (Redrow Homes South West – January 2014)
- Indicative photomontages for development at Lays Farm from photo viewpoints 3, 7 and 10 as identified in the Landscape and Visual Appraisal referred to above [to follow – awaiting Andrew Sharland advice].

## 5.0 Summary of Agreed Matters

5.1 The following are matters agreed between the parties:

5.2 Description of the site (Ref: Section 2 above)

5.3 The overall conclusion summarised in the Council's February 2013 screening opinion is that the development of up to 150 dwellings at Lays Farm would not have any significant environmental effects. The EIA screening opinion issued by B&NES Council that the '*landscape effect* (of 150 dwellings) *is unlikely to be significant in terms of the EIA regulations*' does not in itself indicate the acceptability or otherwise of a proposed development and that decisions on acceptability would normally be informed by a Landscape and Visual Impact Assessment regardless of whether an EIA is required.

5.4 The alignment of the high pressure gas main as shown on the plan supplied by Wales and West Utilities

5.5 Subject to the granting of planning permission within the timeframe assumed by Redrow Homes the ability of the site to deliver 150 dwellings in the 5 year period 2015 to 2020

5.6 If the Inspector were minded to modify the Core Strategy and allocate this site the parties agree that placemaking principles would be required within the policy wording.

5.7 The alignment of the pipeline and the associated easement has the potential to constrain development on the western part of the site; though Redrow Homes South West have recent experience in Bristol of cost effectively replacing and rerouting such a pipeline in order to facilitate development.

## 6.0 Summary of Matters in Dispute

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

- 6.1 It was following confirmation of the actual alignment of the pipeline further west that Redrow Homes South West commissioned a more detailed Landscape and Visual Appraisal of the land at Lays Farm. In particular, in carrying out the appraisal the Landscape Consultants were asked to consider the extent to which additional land, over and above that indicated by the Council in Annex 3, could be removed from the Green Belt without unacceptably compromising the purpose of the Green Belt in preventing the merging of Keynsham with Bristol, while preserving the setting of Queen Charlton.
- 6.2 Based on this detailed Landscape and Visual Appraisal carried out in December 2013 on behalf of Redrow Homes, and the subsequent preparation of photomontages, the company believe that 150 dwellings can be delivered on site without unacceptably compromising the purposes of the Green Belt in this location.
- 6.3 The Council disagrees and believes that the evidence contained within the Stage 1 Green Belt Review (**CD9/E2** - assessment of land parcel: South West Keynsham) demonstrates that the Green Belt within which this site is situated prevents further development eroding the extent of countryside between Bristol (Stockwood) and Keynsham; serves the purposes protecting the countryside from encroachment; protects the separate identities of Keynsham and Queen Charlton; and given the close proximity to the urban areas of Bristol and Keynsham assists in urban regeneration. The Stage 2 Green Belt Review (**CD9/E9**) maintains this assessment, adding that land south of Lays Farm is of high importance for retaining the integrity of the Green Belt between Bristol and Keynsham, and that development to the west of Charlton Road would contribute to eroding the remaining gap between Queen Charlton and Keynsham, causing harm to their separate identities. It does however identify that the single triangular field on the eastern part of the site (land cell D in appendix B4 of **CD9/E9**) could be developed with relatively limited impact on Green Belt purposes, representing an opportunity to consolidate the edge of Keynsham and could be developed without resulting in a narrowing of the Green Belt gap between Keynsham and Bristol, or eroding the gap between Keynsham and Queen Charlton.
- 6.4 Redrow believes that the capacity of the site is 150 dwellings. The Council disagrees. **BNES/51** states that the capacity of the site is around 50 dwellings; it also states that the site does not have the capacity to be considered a full alternative to the proposed site allocation outlined in Policy KE4; it could provide a partial alternative to the proposed site allocation outlined in Policy KE4, but not a site to be considered in addition to that site because the transport evidence indicates that a greater level of development than that proposed in Policy KE4 would have a more serious impact on the congestion in the town centre. **BNES/51** also states that the site does not have the capacity to be a strategic reserve.

6.5 The Councils Landscape Architect has reviewed this statement and the conclusions of the EIA screening opinion (detailed in para 3.3), and concludes that the site is visible in short, medium and long views, that the site occupies a much larger skyline than the Lays Farm Industrial site to the north, and that the landscape effect is likely to be significant for all except the eastern field; and that with the exception of the smaller eastern field, the rest of the site relates visually to the landscape setting of Charlton Valley/Queen Charlton and lies on a skyline, and that therefore there would be an urbanising effect.

6.6 Redrow Homes have suggested specific wording for the Placemaking Principles. The Council cannot agree specific wording of principles through this statement of common ground, as the Council is not proposing to allocate the site, and they have not been the subject to public consultation. The wording proposed by Redrow Homes is as follows:

- The residential development would include 30% affordable housing
- The site would be developed at an average density of 35 dwellings per hectare
- A comprehensive Masterplan would be prepared through public consultation
- Dwellings would front onto Charlton Road and have a positive relationship with all publicly accessible routes. Development should also face outwards towards the open countryside.
- Building heights would be generally limited to 2 storeys, ensuring development does not break the skyline in views from Queen Charlton Conservation Area once proposed structure planting has matured, with some 3 storey development fronting Charlton Road and possibly some single storey development on the west and southern edge.
- A key part of the on-site requirement for green infrastructure would be the provision of woodland and copse planting along the south and western boundary as shown on the Concept Diagram, to provide a landscape buffer from views from the south and west, and strengthen the sylvan character of the area. New planting should maximise native species woodland edge habitat and provide for public access.
- Existing street trees along Charlton Road would be retained and supplemented.
- A direct highway access would be formed to Charlton Road.
- Consideration would be given to the need for any off-site highway capacity requirements resulting from the development (e.g. *the St Ladoc Road/A4175 Bristol Road/Trescothick Close roundabout and A37/Queen Charlton Lane junction.*)

Consideration would be given to the need for financial contributions for primary school places within the Keynsham primary school planning area.

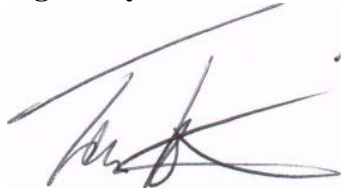
**7.0 Other Matters**

- 7.1 Further transport modelling has been undertaken by the Council using a micro-simulation transportation Paramics model of Keynsham. The modelling was made available on 14th February 2014. As the modelling is being published alongside the statements 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.
- 7.2 Further to the Landscape and Visual Appraisal undertaken on behalf of Redrow Homes, a series of photomontages have been prepared in consultation with the Council's Landscape Architect with a view to reducing the degree of disagreement between the parties prior to the Hearings. The Council's Landscape Architect has not yet had an opportunity to study these photomontages.

**8.0 Declaration**

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

**Signed by Tim Roberts on behalf of Redrow Homes:**



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**Position: Director DLP Planning Consultants**

**Date: 17.02.2014**

**And**

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



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**Position: Planning Policy Team Leader**

**Date: 18.02.14**

**Appendix 1: Site Plan**

