

BATH AND NORTH EAST SOMERSET - CORE STRATEGY EXAMINATION

HEARING – 3 APRIL 2014 (Possible continuation 4 April AM)

STRATEGIC ALLOCATIONS/SAFEGAURDED LAND, KEYNSHAM

INSPECTOR'S AGENDA

The overall issue for this hearing is: are the strategic allocations and safeguarded land to be removed from the Green Belt at Keynsham justified in principle and are the detailed requirements of the policies appropriate and effective? The hearing is in 3 parts to cover, respectively: Keynsham East and the adjoining safeguarded land; Keynsham South West (proposed allocation and alternative safeguarded land being sought); other alternative sites at Keynsham.

Given the volume of material already submitted in relation to these sites/alternatives and the helpful Statements of Common Ground (SCG) (those received by me by 27 February) no further statements are requested and no further written evidence/documents will be accepted other than set out in my Guidance Notes.

If parties want to discuss in detail the technical highway issues/modelling arising from the Council's most recent highway evidence (*Keynsham Core Strategy Options Highway Impact Assessment*, February 2014, CD12/18), or if more time would achieve some agreement on technical matters, I am likely to defer that matter to a later hearing (to be arranged). Such a session would be needed only if the Council's new evidence was likely to be significant for my conclusions. Parties commenting on this evidence should indicate the extent of any disagreement and what might need to be explored further.

At the hearing, on each subject below, the Council should briefly explain the reasons for the acceptability of the development, followed by those who are opposed to the principle of allocation in relation to that issue (and any Council response), then those who seek any detailed change (and any Council response).

PART 1 - KEYNSHAM EAST/SAFEGAURDED LAND

This session is intended to cover CSA33 (Policy KE3A East Keynsham); CSA34 (proposed safeguarded land); CSA35 and 36 and any enlargement sought relating to these areas.

1. Green Belt

1.1 What would be the effect of the allocation on the purposes served by the Green Belt in this location? Would it undermine the purpose of separating Saltford and Keynsham? Council should explain its justification for removal from the Green Belt carefully in the context of the *Green Belt Review Stage 1* (CD9/E2 pp47-48) and *Stage 2* (CD9/E9 pp7-15) Reports.

1.2 If an allocation is justified in principle, is the proposed Green Belt boundary shown on the Concept Diagram and Policies Map (CD10/CS1, Annexes 1 and 2) appropriate for the scale of development envisaged? Would the narrower allocation which included land to the south shown in alternative option KM2 (CD10/C51) have less impact on the purposes of the Green Belt?

1.3 Should any new Green Belt boundary between the A4 and the railway line be primarily determined by the development constraint of the gas pipeline or other factors?

2. Housing numbers and density

2.1 In SCG BNES/53H the land promoters dispute the density in Place-making Principle 1 of 40-45 dwellings per hectare; the Council refers to the promoters' Concept Plan as justification. CD13/8 has 3 suggested density scenarios ranging from 30 to 45 dph (as part of the promoters' larger scheme).

2.2 Is the proposed density justified in this location? Should it be specified in the policy or left to Master-planning work? If an appropriate density was 30-35 dph what would be the consequence for accommodating the proposed 250 dwellings?

2.3 The allocation is for *around 250 dwellings*. Is this intended as a cap or might a future decision maker perceive it as such? Should flexibility to accommodate more or fewer dwellings within the location be acknowledged, if all the requirements of the policy can be met and any harm avoided? If so, how might this be expressed (either here or as a general statement applying to all the allocations)?

3. Employment

3.1 What is the Council's main justification for the scale of employment proposed and is it consistent with market requirements at Keynsham?

3.2 Wadderton Park Ltd (Rep 4847; SCG BNES53/G) indicate that if the land to the north of the A4 remains allocated solely for employment uses then it is unlikely to be delivered. Why?

- What (if anything) would enable significant employment to be delivered within the overall allocation?
- If there are little or no prospects for delivering the employment element should the proposed allocation be deleted north of the A4 or should it still be removed from the Green Belt as safeguarded land?
- Is land north of the A4 suitable for mixed use development (residential/employment)?

3.3 In SCG BNES/53/H the Council accept that the policy wording should be more flexible in relation to the types of employment uses that could be allowed. Council to suggest revised wording prior to the hearing. Would this flexibility assist delivery?

4. Highways and Transport

4.1 Does the scale/location of the allocation accord with the NPPF's core planning principle (paragraph 17, 11th bullet) to *manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development on locations which are or can be made sustainable?*

4.2 Would the residual cumulative impact on the local road network be *severe* (the test of acceptability in the NPPF, paragraph 32)?

4.3 Is the vehicular access to Broadmead roundabout shown on the Concept Diagram an essential requirement (as it is not specifically required by the policy)?

4.4 The Council's summary *Transport Access Assessment* (CD10/E22, November 2013): states: *access to Broadmead roundabout is unlikely to be possible without gaining control of additional land and remodelling this junction*. Is there a technically acceptable solution to adding a fifth a 5th arm to this roundabout; do the site's promoters have control of all the necessary land? If not, what are the consequences for delivery?

4.5 Place-making principle 12 refers to access to the Chandag Estate to allow for a through bus route. A number of representations from local residents express concern at the practical consequences of this suggestion. Are the roads on the Chandag Estate suitable as a bus route (or for more frequent use than at present) particularly given on-street parking? Would any such problems be exacerbated by the loss of the parking area in Teviot Road for the new road link? Is this policy requirement necessary?

4.6 Why does the Concept Diagram show a pedestrian and cycle link to the community woodland to the south? Is this necessary/appropriate as it would not connect to any cycle link beyond?

5. Heritage Assets, Landscape and Ecology

5.1 Would there be any harm to heritage assets, landscape or the ecology of the area to be allocated? If so, what is the degree/significance of the harm?

5.2 Representation 3017 raises a number of detailed concerns on these matters What is the significance of the *remnant medieval strip lynchet field pattern* highlighted in *Keynsham East Landscape and Visual Impact Assessment* (CD9/LV17 p34)? Are the references in the *Heritage Assets Study* (Appendix 6, unnumbered paragraphs between 6.21 and 6.22, CD/LV11) to *vestiges of ridge and furrow* (under *Medieval*) and later to *putative medieval ridge and furrow* (under *Undated*) all referring to the same features? Do these have any wider significance for the setting of the listed Keynsham Manor?

5.3 In *Keynsham East Landscape and Visual Impact Assessment* (CD9/LV17 p34) is the key to the *Map KE4 to 6 Combined* correct/is the colouring of the land parcels consistent with the analysis in text (I found it difficult to follow)? If there are any errors the Council to issue a correct plan.

6. Other Place-making Principles

6.1 Is the requirement for some use of natural lias limestone (PP6) justified or too prescriptive?

6.2 Why is off-site green infrastructure required (PP7)? If justified, is the requirement deliverable by the site promoter? Some representations express concern that the requirement may involve tree planting on a flower-rich meadow (as shown by the *woodland extension* diamonds on the Concept Diagram) not recognised in the *Preliminary Arboricultural Assessment* (CD10/E6) which recommends additional tree planning. Is this the case and is it justified?

6.3 Is the requirement for land within the allocation for a new primary school justified? Should this be subject to review to ensure land is not permanently reserved if not eventually required?

6.4 PP9 refers to retention of rights of way. Is the east-west footpath across the centre of the site broadly on the same alignment as the indicative course of the Roman Road which PP10 requires to be preserved? Would the alignment of the

footpath leading to the Broadmead roundabout need adjusting if there is to be a road through this narrow part of the site? Is the requirement justified/appropriately expressed?

6.5 My preliminary view is that some of these principles could be expressed more carefully to allow appropriate flexibility in the light of all the circumstances. A draft of any rewording in advance of the hearing by the promoter/Council, especially if agreed, would be welcome.

As with the other strategic allocations, concerns regarding the affordable housing requirement and sustainable construction/renewable energy will be considered at a later joint hearing on those specific matters.

7. Proposed safeguarded land CSA34

7.1 What would be the effect of the removal of the safeguarded land on the purposes served by the Green Belt in this location? Would it undermine the purpose of separating Saltford and Keynsham?

7.2 Is this an appropriate location for identifying safeguarded land for possible future development.

7.3 Does identifying safeguarded land here preclude consideration of the potential for identifying safeguarded land elsewhere at Keynsham? If it does, is this the most appropriate location?

7.4 If justified in principle, is the boundary of the safeguarded land the most appropriate?

7.5 Bearing in mind that the Core Strategy and related housing requirement may well be reviewed within the plan period (before 2029) why is development precluded until after that date? If justified in principle should it be safeguarded only until identified as needed following a review of the plan (assuming any other constraints can be overcome)?

PART 2 - KEYNSHAM SOUTH WEST

This session is intended to cover CSA37 Policy KE4 South West Keynsham and CSA38 and 39 (Diagrams) and any enlargement/safeguarding relating to this area.

1. Green Belt

1.1 What would be the effect of the allocation on the purposes served by the Green Belt in this location? Council should explain its justification for removal from the Green Belt carefully in the context of the *Green Belt Review Stage 1* (CD9/E2 pp47-48) and *Stage 2* (CD9/E9 pp7-15) Reports.

1.2 If an allocation is justified in principle, is the proposed Green Belt boundary shown on the Concept Diagram and Policies Map (CD10/CS1, Annexes 1 and 2) appropriate for the scale of development envisaged?

1.3 A substantial area of land around Parkhouse Farm (a Grade 2 listed building) north of Parkhouse Lane is proposed to be removed from the Green Belt, but is not included in allocation KE4, nor subject to any other policy. The SHLAA (CD10/E19) identifies part of this area as site K18 with a potential capacity of 70 dwellings, but has no clear conclusion on suitability. Subject to consideration of

the effect on the setting of the listed building, does the land to be removed from the Green Belt have potential to accommodate residential development? Should it be subject to any particular policy guidance?

2. Highways and Transport

2.1 Does the scale/location of the allocation accord with the NPPF's core planning principle (paragraph 17, 11th bullet) to *manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development on locations which are or can be made sustainable?*

2.2 Would the residual cumulative impact on the local road network be *severe* (the test of acceptability in the NPPF, paragraph 32)?

3. Heritage Assets, Landscape and Ecology

3.1 Would there be any harm to heritage assets, landscape or the ecology of the area to be allocated? If so, what is the degree/significance of the harm?

4. Other Place-making Principles

4.1 Is the proposed density of 35 dph justified in this location? Should it be specified in the policy or left to Master-planning work? Is the figure of 179 dwellings in SCG BNES/53I (paragraph 3.4) Bloor Homes' estimate of the total site capacity? Is that based on 30dph?

4.2 The allocation is for *around 200 dwellings*. Is this intended as a cap or might a future decision maker perceive it as such? Should flexibility to accommodate more, or fewer, dwellings within the location be acknowledged, if all the requirements of the policy can be met and any harm avoided? If so, how might this be expressed (either here or as a general statement applying to all the allocations)?

4.3 Should the Concept Diagram be amended to exclude *The Bungalow* as it is not in the control of the developer and may not be possible to include in the site without delaying delivery?

4.4 Is the requirement in PP3 for dwellings to front on to Charlton Road consistent with the recommended mitigation to limit height and density in the most westerly fields to avoid potential effect on the Queen Charlton Conservation Area (*Heritage Assets Study CD/LV11, Appendix 4, 4.65*)

As with the other strategic allocations, concerns regarding the affordable housing requirement and sustainable construction/renewable energy will be considered at a later joint hearing on those specific matters.

5. Land to the south/southeast of Packhorse Lane

5.1 On the assumption that the overall housing provision in the Core Strategy is no greater than about 13,000 currently in CSA6, should land to the south/southeast of Packhorse Lane (north of Redlynch Lane) remain in the Green Belt (as proposed by the Council) or be removed as safeguarded land for possible future development? (*Points already made in the discussion on the safeguarded land at Keynsham East should not be repeated.*)

- Council to summarise its main reasons for retaining the Green Belt here.
- Bloor Homes to summarise its main reasons why safeguarded land is justified here.

- Comments by others.

Part 3 Additional or Alternatives Green Belt sites at Keynsham

The focus of the Examination is now whether the changes the Council has proposed including the strategic housing allocations would make the Core Strategy sound. Hence this overall hearing focuses on the soundness of the proposed allocations at Keynsham. Any criticisms of the justification for those allocations should be made in parts 1 and 2 of the hearing. However, to avoid those sessions being made more complex or prolonged with material that really relates to other sites, this session provides a brief opportunity for those who want to be heard on other sites. I do not intend these sessions to repeat matters covered in the previous hearings concerning any alternative sites in January 2012.

I would remind all parties that I could not recommend in my report any such alternative site unless it had been the subject of appropriate public consultation and it would be inevitable that a further hearing would also be required if any alternative were proposed to be included in the Core Strategy. Hence it is inappropriate and unnecessary to examine in this session possible alternatives in the same degree of detail as those currently proposed by the Council. Such detailed scrutiny would take place if they needed to be pursued further.

The identified potential participants need to confirm with the Programme Officer whether they wish to participate.

For each possible alternative location the Council should briefly explain how the merits of any such alternative have been assessed in the overall plan process (or why not assessed) and the reasons they are considered inappropriate or less suitable than the chosen approach. The promoter of the alternative should then summarise the reasons why the plan is considered unsound in the absence of the change sought. The promoter should make clear whether the site is being suggested as a replacement for any of the allocations now proposed by the Council or as an addition. The Council can make a final comment in each case if necessary.

Potential Participants/Sites

1. Lays Farm (south West Keynsham); (Redrow Homes South West SCG BNES/53X, rep 275 and Persimmon Homes Severn Valley Rep 184)
2. Land at Uplands Farm, Keynsham (Society of Merchant Venturers Rep 114)
3. Broadmead Peninsular (River Regeneration Trust, Rep 5169; SCG BNES/53T)
- (4. Land at 50, 52 and 54 St Francis Road (Landowners see BNES/53AB). Only if representations were duly made and they wish to be heard.)

If the hearing cannot be completed on Thursday 3 April, Friday morning will be used for any overrun (9.30 start).

**Simon Emerson
Inspector
March 2014**