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The Savills logo consists of the word "savills" in a lowercase, sans-serif font, colored red, set against a solid yellow rectangular background.

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Dear Sir/ Madam

**Representation on the Bath and North East Somerset Local Plan Partial Update –
Proposed Submission consultation (Regulation 19)**

Society of Merchant Venturers – Land to the south/ south-east Keynsham

Savills is instructed by the Society of Merchant Venturers (SMV) to submit representations in response to the Proposed Submission consultation (Regulation 19) for the Bath and North East Somerset (B&NES) Local Plan Partial Update (LPPU).

The SMV is a private organisation, incorporated under the Royal Charter, that is the endowment trustee of the St. Monica Trust, a registered charity that owns and manages land within the charity's ownership at Keynsham. The income generated from the holding is used to help fund the work of the charity, and any proceeds generated are similarly held for the benefit of the charity.

Specifically, this representation is made in the context of our client's substantial land interest to the south/south-east of Keynsham. The SMV own sites K21, K22, K23 and also part of K24 which are all in the Council's current Housing and Economic Land Availability Assessment (HELAA) (2018/19). These sites were re-suggested to the Council via the Call for Sites exercise last year.

Please find enclosed a Site Location Plan (RLO1) which incorporates sites K21, K22, K23 and K24 (the latter lies partly within SMV ownership). For information please also find attached a wider land ownership plan which illustrates the full extent of our client's landholdings in south/ south-east Keynsham.

On behalf of our client, we have previously proposed an extensive urban extension to the south-east of Keynsham, via the withdrawn West of England Joint Spatial Plan (JSP). We have also previously promoted a potential development of only part of the land at Uplands Farm, Keynsham – comprising some 250 dwellings together with a neighbourhood centre providing local services and facilities for the development and which could serve a wider area improving sustainability locally. A refreshed Concept Masterplan (MP01) and Constraints Plan (AP01) are enclosed. The Concept Masterplan defines potential residential development areas which have a combined potential capacity in the region of 400 dwellings subject to further technical work.

For clarity, the land remains in agricultural use and there is no relevant planning history.

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Representations to the LPPU Proposed Submission (Regulation 19) consultation

The response is structured according to the relevant chapters within the LPPU Proposed Submission consultation document, with reference to supporting evidence studies and topic papers where relevant. In summary the representation:

- Suggests new sites should be safeguarded for housing development as part of the LPPU in the event of an increased identified need/ housing shortfall prior to the adoption to the WECA Spatial Development Strategy or new B&NES Local Plan; and
- Demonstrate that land at Uplands Farm, Keynsham remains available and is suitable for development and suitable for safeguarding or allocation in the LPPU.

The response also provides a summary, including on the concept masterplanning, and conclusion of the overall benefits of allocating/ safeguarding the SMV's land for housing. A completed representation form also accompanies our response.

B&NES Placemaking Plan Part 1 – District-wide Strategy and Policies – incorporating proposed changes

Vision and District-wide Strategy

Our client considers that the principle of the Council's proposed scope of the LPPU to replenish the supply of housing, as explained in paragraph 5c, is **'sound'** as it will help contribute to ensuring a continuous five year housing land supply and sufficient supply to meet the overall B&NES Core Strategy (2014) requirement. It is noted that the replenishment of the supply of housing is primarily proposed through the identification and allocation of new sites and review of existing allocations.

Policy DW1 – District Wide Spatial Strategy

However despite this proposed scope discussed above, we continue to be concerned with the delays in ensuring a Plan-led approach in B&NES due to the delays in the timetable for the preparation of the emerging West of England Combined Authority (WECA) Strategic Development Strategy (SDS) and the new B&NES Local Plan. These delays could significantly hamper the ability of B&NES Council to demonstrate a suitable supply of housing. This is particularly important as existing safeguarded sites (KE3C and KE3D – East of Keynsham) are now proposed for allocation via this LPPU and therefore it is considered new safeguarded sites for housing development should be identified via the LPPU, and reflected in Policy DW1 explicitly, to ensure that suitable development needs can be maintained in the event of an increased identified need/ housing shortfall. The National Planning Policy Framework (NPPF) at paragraph 143 allows for areas of safeguarded land between the urban area and the Green Belt to be identified in order to meet longer-term development needs.

This is also particularly important when considering the changes to the standard methodology for calculating housing need announced by MHCLG in December 2020 which has added a new "uplift" of 35 per cent for England's biggest cities and urban centres. This "uplift" applies to 20 local authorities one of which is Bristol City Council.

It is noted that the Housing Topic Paper (August 2021), that forms a supporting document to this LPPU Proposed Submission consultation, makes reference to the government's changes to the standard methodology and the proposed "uplift" for the largest cities and urban centres. However, it does not make reference to Bristol City Council being a 35% uplift authority. Paragraph 2.5 states:

"Some revisions to the standard method were announced in December 2020. The primary revision is that for the largest cities and urban areas an uplift has been added. This applies to 20 local authorities, which excludes Bath & North East Somerset."

B&NES Council is one of three authorities that makes up the WECA and will therefore play a key role in helping to deliver the increased needs arising from the standard method for Bristol and to also help meet unmet needs arising in Bristol. Whilst the commitment from B&NES Council to top up housing supply via the LPPU in the context of the adopted Core Strategy is laudable, the wider need of the region must be the focus.

For the reasons identified above, it is suggested that the opportunity is taken now to identify new land to be allocated or safeguarded for residential development and Policy DE1 amended accordingly to reflect this. This will help the LPPU to be **'positively prepared'** and **'consistent with national policy'** and therefore **'sound'**. We consider that our clients land at Uplands Farm, Keynsham is suitable, at the very least, for safeguarding for residential development. The suitability of the land for allocation or safeguarding is discussed later in our representation.

B&NES Placemaking Plan Part 3 – Keynsham – incorporating proposed changes through the Partial Update

Policy KE1: Keynsham Spatial Strategy

Our client supports the Council's proposed approach to replenish the supply of housing directed to Keynsham which is proposed to be partly delivered through allocation of the safeguarded sites currently identified in Policies KE3A (Land adjoining East Keynsham Strategic Site Allocation) and KE3B (Safeguarded Land at East Keynsham) of the adopted Placemaking Plan (Volume 3 – Keynsham). It is suggested that the opportunity is taken now to identify new land to be safeguarded around Keynsham to ensure that suitable development needs can be maintained in the event of an increased identified need/ housing shortfall.

It is important to note that the Core Strategy and Placemaking Plan prioritise the development of brownfield sites and focus residential development at Bath (as the main centre of employment and services & facilities), followed by **Keynsham** as the next most sustainable location within the District.

Our client's view is that extensions to the most sustainable settlements, including Keynsham, are the most appropriate locations to satisfy the housing growth needs. Extensions to the most sustainable settlements can be of a scale that ensures that the most efficient use of existing or proposed infrastructure can be made. The scale of such development can provide additional benefits in providing the resources (land or otherwise) commensurate with the need generated. Sustainable extensions can ensure that existing settlements become more sustainable.

As explained above, Keynsham is a suitable location and our clients land at Uplands Farm, Keynsham would provide an extension to the sustainable settlement. We consider the land is suitable, at the very least, for safeguarding for residential development. Policy KE1 should therefore be amended accordingly to include the land for safeguarding as it will help the LPPU to be **'positively prepared'** and **'consistent with national policy'** and therefore **'sound'**. The opportunities and benefits of safeguarding the SMV land at Uplands Farm are considered in detail later in this representation.

Policy KE3D East of Keynsham – former safeguarded Land (K26)

It is noted that a planning application (18/01509/OUT) on the former safeguarded land now proposed for allocation in Policy KE3D was refused permission on 28th December 2018, in part due to highway impact. A current application for the eastern parcel of safeguarded land (20/02673/OUT) was validated on 30th July 2020 and at the time of writing these representations the determination is still pending and highways matters would appear to remain unresolved. We therefore consider due to this uncertainty with the delivery of the site, Policy KE3D is currently **not 'sound'** as it is **not 'effective'**.

If the former safeguarded land now proposed for allocation via Policy KE3D cannot be suitably demonstrated to be delivered then alternative site(s) around Keynsham must be considered. We strongly consider that land at Uplands Farm, Keynsham is a reasonable alternative site for allocation. The opportunities and benefits of allocating/ safeguarding the SMV land at Uplands Farm are considered in detail later in this representation.

Green Belt Assessment

As land surrounding Keynsham is within the Green Belt, in the event that an alternative housing site for allocation or new housing site(s) for safeguarding are necessary then a review of the Green Belt boundaries at Keynsham will be required. The existing Development Plan spatial strategy allows for changes to be made to the Green Belt boundary surrounding Keynsham to accommodate both employment floorspace and housing. Further changes to the Green Belt around Keynsham are therefore possible within the scope of the existing spatial strategy.

Our client is of the view that land in the Green Belt immediately adjacent to the most sustainable locations - such as Keynsham - is more preferable for development than directing growth to less sustainable locations outside the Green Belt. If the Green Belt Review assessment is required, we therefore consider that all options around Keynsham should be considered before looking at less sustainable locations in the district. A comprehensive assessment of land around Keynsham should be undertaken including land to the south of Keynsham (such as Uplands Farm), to ensure a robust consideration of all reasonable alternatives.

Opportunities and benefits of allocating/ safeguarding the SMV land

Our client is aware that as part of the preparation for the review of the Core Strategy, the Council appointed Ove Arup and Partners Limited ('Arup') to investigate development concept options for ten locations to inform the consideration of additional housing led development. The locations were largely adjacent to the principal settlements within and associated with Bath and North East Somerset. Four locations on the edge of Bath, two on the south edge of Bristol and four on the edge of Keynsham were investigated. As part of this work, a "Land at Uplands: Development concept options Report" was prepared and published by the Council in 2013.

The report outlined the following key opportunities for the land at Uplands Farm:

- well contained and could be designed to have limited impact on the wider landscape;
- close to an existing employment site to the south;
- the B3116 provides good access to the A4 and town centre and industrial estate to the north;
- the area is adjacent to an established residential area and as such is a complementary use with socially sustainable benefits;
- the Manor Road Community Woodland is a major Community Asset lying nearby;
- all within Flood Zone 1;
- land immediately south of the existing residential development would form a natural extension; and
- the land is available.

These key opportunities outlined in the report remain a valid assessment and are supported by our client. Our client would also like to highlight that the sites benefit from being in single ownership and as a result there is flexibility in which site or combination of SMV sites at Uplands Farm can come forward to help ensure the B&NES LPPU (and the B&NES new Local Plan and the WECA SDS) identifies sufficient housing sites.

Illustrative Concept Masterplan

As noted earlier, we have prepared an illustrative Concept Masterplan (MP01) and Constraints Plan (CP01). The Concept Masterplan has responded to the constraints and opportunities as set out below.

Land West of Wellsway

SMV controls two land parcels in this location, of which the western parcel is more sensitive to landscape impacts. A footpath runs along the southern part of this land parcel. The western part could therefore be developed as public open space with links into the wider footpath network, providing wider access to the countryside. The open space might be best developed to complement the existing woodland planting to the west – to enhance the nature conservation areas and add locally to biodiversity.

The land parcel adjacent to the road is bordered north and south by existing residential development, and is a clear candidate for further residential development.

This site could be accessed separately to the SMV land east of Wellsway, or potentially via a mini-roundabout providing access to both sites.

Land East of Wellsway

SMV controls an extensive area of land east of Wellsway. We believe that there is an opportunity for a wider (more long-term) comprehensive development allocation in this area. In our Constraints Plan we have examined the area extending eastwards from the road and north of Uplands Farm. The easement required for the gas pipeline creates a boundary within the site, that could separate development east and west and provides an opportunity for green infrastructure.

The Concept Masterplan shows how the tree-lined avenue could loop through the western part of the site, providing future bus access. SMV would provide a local centre adjacent to Wellsway to ensure that only local trips by foot are required for daily needs. It may also be possible to provide a footpath and cycle link through Hardington Drive although we do not propose vehicular access at this location. There is potential for a future vehicle link to Courtenay Road as shown on the Concept Masterplan. We have indicated that development would be secured with an offset from the southern boundary, in order that this higher part of the site can accommodate a wide band of tree planting, providing natural walks and biodiversity gain in addition to softening this new edge to the Green Belt and screening the development from the wider countryside.

The more sensitive south-eastern part of the site would remain open.

The site offers extensive opportunities for new access to the countryside, biodiversity improvements, natural habitats, community orchards, allotments, formal and informal open spaces. A series of new footpaths, linked in to existing networks, would provide existing and new residents with access to a wide range of green spaces, creating a development that provides excellent health and well-being for new and existing residents. The local centre, would provide additional opportunities for nearby residents to make trips by foot for local shopping and services.

New climate change and biodiversity policies (SCR6, SCR7, SCR8, SCR9, NE3a)

We note that another aspect of the LPPU is to amend specific development management policies. New policies, as listed below, are suggested particularly in relation to climate change and biodiversity:

- New Policy SCR6 Sustainable Construction Policy for New Build Residential Development;
- New Policy SCR7 Sustainable Construction Policy for New Build Non-Residential Development;
- New Policy SCR8 Embodied carbon;
- New Policy SCR9 Electric vehicles charging infrastructure; and
- New Policy NE3a Biodiversity Net Gain.

Whilst we have no specific comments on the new development management policies proposed, any new requirements must be 'justified' through robust evidence and 'consistent with national policy'. The requirements set out in the new policies must also not inhibit the delivery of much needed housing.

Conclusion

As currently prepared, we consider that the LPPU Proposed Submission is **not 'sound'** as it not **'positively prepared', 'effective' or 'consistent with national policy'**.

We consider that the LPPU can be made sound by including new safeguarded sites for housing development. Land at Uplands Farm, Keynsham remains available and is suitable for safeguarding or allocation in the LPPU.

We request that if an alternative site to the proposed allocated site in Policy KE3D (East of Keynsham – former safeguarded Land (K26)) is required then our clients land should be considered favourably.

The SMV would welcome discussions with B&NES Council to discuss the opportunity of delivering development at Uplands Farm, Keynsham.

I can confirm on behalf of our client that we do not wish participate in the Examination Hearing Sessions. Please can you confirm receipt of this representation.

Yours faithfully

A handwritten signature in black ink, appearing to read "Ed Rehill".

Ed Rehill BSc MSc MRTPI

Associate Planner

Enc.

Site Location Plan (RL01)

SMV Keynsham Estate Plan

Refreshed Uplands Farm, Keynsham Concept Masterplan (MP01, February 2021)

Constraint Plan (AP01, February 2021)

Completed representation form