



# Bath and North East Somerset Local Plan Partial Update

## Regulation 19 Consultation

September 2021



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## CONTENTS

<b>1</b>	<b>Introduction</b> .....	<b>2</b>
1.1	Context.....	2
1.2	Plan Making.....	2
<b>2</b>	<b>Legal Compliance</b> .....	<b>4</b>
2.1	Duty to Cooperate .....	4
2.2	Sustainability Appraisal .....	5
<b>3</b>	<b>National Planning Guidance</b> .....	<b>6</b>
3.1	National Planning Policy Framework.....	6
3.2	Planning Practice Guidance .....	8
3.3	National Planning Policy Consultations .....	9
<b>4</b>	<b>Local Plan Partial Update Regulation 19</b> .....	<b>11</b>
4.1	Background .....	11
4.2	Housing Requirement (Policy DW1 District-Wide Spatial Strategy). .....	11
4.3	Addressing the Shortfall in Housing Delivery .....	12
4.4	New Policy NE3a: Biodiversity Net Gain .....	14
4.5	Policy H7: Housing Accessibility .....	15
<b>5</b>	<b>Site Submission profiles</b> .....	<b>17</b>
5.1	Land off Old Road, Writhlington.....	17
5.2	Land off Farrington Road, Paulton .....	17
<b>6</b>	<b>Conclusions</b> .....	<b>19</b>
6.1	Summary.....	19

# 1 INTRODUCTION

## 1.1 Context

1.1.1 Gladman welcome the opportunity to comment on the Bath and North East Somerset Local Plan Partial Update Regulation 19 consultation and request to be updated on future consultations and the progress of the Local Plan.

1.1.2 Gladman Developments Ltd specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the development plan preparation process having made representations on numerous planning documents throughout the UK alongside participating in many Examinations in Public.

1.1.3 The Council will need to carefully consider its policy choice and ensure that the proposed approach positively responds to the revised National Planning Policy Framework (2021). There will also be a need to take consideration of changing circumstances associated with national planning policy and guidance over the course of the plan preparation period, including the Government's emerging proposals for the planning system, as set out in the Ministry for Housing, Communities and Local Government (MHCLG) consultations on "Changes to the Current Planning System, August 2020" and "Planning for the Future, August 2020".

1.1.4 Gladman Developments have two land interests in Bath and North East Somerset which are being promoted through the emerging Local Plan. These include Land off Old Road, Writhlington for up to 255 dwellings, school drop-off zone and associated works, and Land off Farrington Road, Paulton for up to 130 dwellings. Both sites are available, suitable and deliverable for housing as summarised in Section 4.7 of this representation. Gladman looks forward to engaging further with the Council as the plan preparation process progresses.

## 1.2 Plan Making

1.2.1 The National Planning Policy Framework sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

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- **Positively Prepared** – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
  - **Justified** – the plan should be an appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
  - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
  - **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

## 2 LEGAL COMPLIANCE

### 2.1 Duty to Cooperate

- 2.1.1** The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2020 Sevenoaks District Council Local Plan examination and subsequent Judicial Review, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.
- 2.1.2** Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration, as set out in the Planning Practice Guidance (PPG) it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard, Selby must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross-boundary strategic issues, and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation.
- 2.1.3** The revised Framework introduced a number of significant changes to how local planning authorities are expected to cooperate including the preparation of Statement(s) of Common Ground (SoCG) which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist. Planning guidance sets out that local planning authorities should produce, maintain, and update one or more Statement(s) of Common Ground (SoCG), throughout the plan making process<sup>1</sup>. The SoCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with e.g. unmet housing needs.

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<sup>1</sup> PPG Reference ID: 61-001-20180913

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## 2.2 Sustainability Appraisal

- 2.2.1** In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.
- 2.2.2** Bath and North East Somerset Council should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Local Plan's decision-making and scoring should be robust, justified and transparent.

## 3 NATIONAL PLANNING GUIDANCE

### 3.1 National Planning Policy Framework

3.1.1 On 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the Revised National Planning Policy Framework which was subsequently updated in February 2019 and July 2021. These publications are revisions to the initial 2012 Framework and implemented changes that were informed through the Housing White Paper, The Planning for the Right Homes in the Right Places consultation and Planning for the Future consultation.

3.1.2 The 2019 Framework introduced a number of major changes to national policy which provide further clarification to national planning policy as well as new measures on a range of matters. Crucially, national policy reaffirms the Government's commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for to address the housing, economic, social and environmental priorities to help shape future local communities for future generations. In particular, Paragraph 16 of the Framework (2021) states that Plans should:

***"a) Be prepared with the objective of contributing to the achievement of sustainable development;***

***b) Be prepared positively, in a way that is aspirational but deliverable;***

***c) Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;***

***d) Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;***

***e) Be accessible through the use of digital tools to assist public involvement and policy presentation; and***

***f) Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)."***



- 3.1.3 To support the Government’s continued objective of significantly boosting the supply of homes, it is important that the Local Plan provides a sufficient amount and variety of land that can be brought forward, without delay, to meet housing needs.
- 3.1.4 In determining the minimum number of homes needed, strategic plans should be based upon a local housing needs assessment defined using the standard method, unless there are exceptional circumstances to justify an alternative approach.
- 3.1.5 Once the minimum number of homes that are required is identified, the strategic planning authority should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. In this regard, paragraph 67 sets out specific guidance that local planning authorities should take into account when identifying and meeting their housing needs. While Annex 2 of the Framework (2021) provides definitions for the terms “deliverable” and “developable.
- 3.1.6 Once a local planning authority has identified its housing needs, these needs should be met as a minimum, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so. This includes considering the application of policies such as those relating to Green Belt and giving consideration as to whether or not these provide a strong reason for restricting the overall scale, type and distribution of development (paragraph 11b)i.). Where it is found that full delivery of housing needs cannot be achieved (owing to conflict with specific policies of the NPPF), Local Authorities are required to engage with their neighbours to ensure that identified housing needs can be met in full (see Paragraph 35 of the NPPF 2021).
- 3.1.7 The July 2021 revision to the NPPF provides greater focus on the environment, design quality and place-making alongside providing additional guidance in relation to flooding setting out a Flood Risk Vulnerability Classification at Annex 3, the importance of Tree-lined streets and amendments to Article 4 directions. Additionally, Local Plans which have not yet progressed to Regulation 19 stage should ensure that where strategic developments such as new settlements or significant extensions are required, they are set within a vision that looks ahead at least 30 years (See paragraph 22).
- 3.1.8 The amendments coincide with the publication of the National Design Guide and National Model Design Code, a toolkit which helps local communities to shape local design needs

and provide guidance for creating environmentally responsive, sustainable and distinctive places with a consistent and high-quality standard of design.

## 3.2 Planning Practice Guidance

- 3.2.1 The Planning Practice Guidance (PPG) was first published by the Government to provide clarity on how specific elements of the NPPF should be interpreted. The PPG has been updated to reflect the changes introduced by the revised NPPF to national planning policy. The most significant changes to the PPG relate to defining housing need, housing supply and housing delivery performance.
- 3.2.2 The Standard Method was introduced by the Government to simplify the process of defining housing need, avoid significant delay in plan preparation and ultimately facilitate the Government's ambition to achieve 300,000 new homes annually.
- 3.2.3 Revisions to the PPG on the 20th February 2019 confirmed the need for local planning authorities to use the 2014-household projections as the starting point for the assessment of housing need under the standard method<sup>2</sup>.
- 3.2.4 It is also vital to consider the economic impact of COVID-19 and the long-term role that housing will play in supporting the recovery of the economy, both locally and nationally. We support the Council in its positive approach to plan for above the minimum requirement, which will enable Bath and North East Somerset to capture a larger proportion of the £7 billion yearly housebuilder contributions<sup>3</sup>. With 218,000 homes predicted not to be built due to COVID-19 from now to 2024/25<sup>4</sup>, it is also imperative that the Local Plan identifies sufficient land to support the delivery of homes.
- 3.2.5 In order for the housing needs for the whole plan period to be met, it will also be essential to provide sufficient headroom within the housing supply. In this regard, Gladman supports the Home Builders Federation's recommendation that local plan should seek to identify

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<sup>2</sup> PPG Paragraph: 005 Reference ID: 2a-005-20190220

<sup>3</sup> MHCLG (2020). 'Planning for the Future'. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/907647/MHCLG-Planning-Consultation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/907647/MHCLG-Planning-Consultation.pdf)

<sup>4</sup> Shelter & Savills (2020). 'Over 80,000 new homes will be lost in one year due to COVID chaos'. Available at: [https://england.shelter.org.uk/media/press\\_releases/articles/over\\_80,000\\_new\\_homes\\_will\\_be\\_lost\\_in\\_one\\_year\\_to\\_covid\\_chaos](https://england.shelter.org.uk/media/press_releases/articles/over_80,000_new_homes_will_be_lost_in_one_year_to_covid_chaos)

sufficient deliverable sites to provide a 20% buffer between the housing requirement and supply.

### 3.3 National Planning Policy Consultations

- 3.3.1 On the 6th August 2020, Government published the Planning for the Future White Paper setting out proposals for how it is seeking to 'radically reform' the planning system. The proposals are seeking to streamline and modernise the planning process.
- 3.3.2 A further consultation on immediate changes to the current planning system closed on 1st October 2020<sup>5</sup>. Of significant note is a proposed revised standard method for calculating local housing need, which proposed to incorporate a percentage of existing stock as the baseline of the calculation.
- 3.3.3 In December 2020 the Government published their response to the 'Changes to the Current Planning System'. This document provides an overview of the consultation responses before highlighting that it has been deemed that the most appropriate approach is to retain the Standard Method in the current form with an additional 35% uplift to the 'post-cap number' for 20 local authorities. The Government's rationale behind this approach is to increase home-building in existing urban areas to make the most of previously developed brownfield land over and above that in the existing standard method.
- 3.3.4 The latest correspondence from Government regarding the revisions to the Standard Method for calculating local housing need will not affect the minimum local housing need which Bath and North East Somerset Council should Plan for.
- 3.3.5 In her speech at the State Opening of Parliament in May 2021, the Queen announced that the Government will introduce "laws to modernise the planning system, so that more homes can be built, will be brought forward...". Notes accompanying the speech confirm that a future Planning Bill will seek to create a simpler, faster, and more modern planning system that ensures homes and infrastructure can be delivered more quickly across England. Timings on the publication of the draft Planning Bill remain uncertain, however, subject to the outcomes of this process, the Government has signalled its intent to make

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<sup>5</sup> Ministry of Housing, Communities & Local Government: Changes to the Current Planning System Consultation <https://www.gov.uk/government/consultations/changes-to-the-current-planning-system>

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rapid progress toward this new planning system through the swift introduction of new legislation to implement the changes.

- 3.3.6 In September 2021, Michael Gove replaced Robert Jenrick as the Secretary of State for Housing, Communities and Local Government while the ministry was renamed to the 'Department for Levelling Up, Housing and Communities'.
- 3.3.7 It will be important that the Council keeps abreast with the implementation of the above changes and any subsequent revisions to planning policy to determine any potential implications for the Local Plan.

## 4 LOCAL PLAN PARTIAL UPDATE REGULATION 19

### 4.1 Background

4.1.1 The Development Plan in Bath & North East Somerset primarily comprises of the Core Strategy (adopted in 2014) and the Placemaking Plan (adopted in 2017), both of which cover a plan period from 2011 to 2029.

4.1.2 A new Joint Spatial Plan (JSP) in collaboration for the West of England Combined Authorities (WECA) (Bath and North East Somerset, Bristol City, North Somerset and South Gloucestershire) was withdrawn from examination in April 2020. The new Local Plan for Bath and North East Somerset (BaNES) which would have corresponded with the JSP is also now being paused as arrangements for future sub-regional planning are established.

4.1.3 WECA are beginning to establish a new Spatial Development Strategy which will set out the vision for how people will live, work and play in the West of England over the next 20 years and will help us deliver our commitment to achieve carbon neutrality by 2030. It will influence where the homes and jobs in each local area will go and will be important in shaping future decisions on development. This Strategic level plan strategy is proposed to be published in Draft in Autumn 2021 with the hope for submission to Examination by Local Plan Inspectors in 2022 before adoption in Winter 2023.

4.1.4 In this context, BANES Council have resolved to partially update the Local Plan addressing policies which no longer reflect national policy and to ensure there is a sufficient supply of housing over the entirety of the plan period but without changing the spatial priorities of the adopted Plan. It is understood through the scoping documents that the Partial Update does not amount to a new Local Plan and does not change the adopted plan period, nor update the strategic policies which are now more than five years old.

4.1.5 The sections that follow below include specific comments from Gladman on the Council's Issues papers, covering a range of the topics and questions that have been posed.

### 4.2 Housing Requirement (Policy DW1 District-Wide Spatial Strategy).

4.2.1 Paragraph 33 of the 2021 NPPF highlights that policies in Local Plans should be reviewed to assess whether need to be updated at least once every 5 years, acknowledging changing circumstances in the area or changes in national policy. In addition, strategic policies will

need updating at least once every 5 years if there applicable local housing need figure has changed significantly or is expected to change significantly in the near future. Footnote 20 of the Framework also highlights that reviews at least every 5 years are a legal requirement for all Local Plans.

- 4.2.2 The Council propose in paragraphs 3.2 – 3.3 the Housing Supply Topic Paper that the LPPU will continue to meet the Core Strategy housing requirement as the Standard Method figure has not changed significantly and remains lower than the Core Strategy requirement. However, a review of the Core Strategy Housing Requirement within Policy DW1: District Wide Spatial Strategy does not appear to have been specifically conducted despite now being over 5 years old.
- 4.2.3 As referred to in Section 4.1 of this representation, the Council paused a full review of the Local Plan following the withdrawal of the WECA Joint Local Plan from examination. The Council are now holding off the production of a new, full Local Plan until the new WECA Spatial Development Strategy (SDS) is submitted for Examination in Public in Autumn 2022.
- 4.2.4 If the published local development scheme is accurate, this would result in the new Local Plan being adopted in 2024, while the SDS will be adopted in 2023. The proposed adoption dates would mean that BaNES' strategic policies, including housing land supply and plan period, would not have been reviewed or updated in 9 years (since adoption in 2014) despite the guidance set out in the Framework.
- 4.2.5 In this regard, Gladman consider that the Council should be reviewing the Local Plan and Core Strategy documents in full, reviewing strategic policies including the spatial strategy and housing requirement rather than delaying this through the LPPU. Indeed, it would be more appropriate for the Council to begin preparations for the full Local Plan Review in order to align with timescales set for the SDS and ensure that any uplifts to the Standard Method housing figure in relation to West of England Growth Deals or unmet housing needs.

## 4.3 Addressing the Shortfall in Housing Delivery

- 4.3.1 The Council are seeking to allocate new housing development sites through the LPPU to address a shortfall in housing delivery against the Core Strategy housing requirement between 2021 and the end of the Plan Period in 2029.

- 4.3.2 Yet according to the Council's housing trajectory dated March 2021<sup>6</sup>, the Council currently do not have a shortfall against either the Standard Method housing figure nor the Core Strategy requirement and will deliver the full 13,000 houses required.
- 4.3.3 It appears that the Council are allocating new sites through the LPPU in an attempt to maintain a five-year housing land supply in the short term, rather than comprehensively reviewing the strategic policies of the Plan to deliver and guide the long term needs of the district. While this accords with Paragraph 74 of the Framework, Gladman reiterate that it does not meet the requirements of Paragraph 33 to ensure that strategic policies in the Local Plan are reviewed at least every 5 years.
- 4.3.4 Notwithstanding the above, Gladman have concerns relating to the significant reliance on brownfield sites and allocation of further brownfield sites in order to maintain a five-year housing land supply.
- 4.3.5 Gladman accept the importance of brownfield regeneration but highlight the significant costs associated with the development of previously developed land which may impact the viability of the schemes and thus the scale of developer contributions required to be provided. Indeed, national policy guidance highlights that an applicant can demonstrate such circumstances at the application stage through a viability assessment detailing the inability to meet certain cost implications of policy requirements, planning obligations and where relevant Community Infrastructure Levy charges<sup>7</sup>. The costs identified in the viability assessment may include numerous circumstances, such as
- "...abnormal costs, including those associated with treatment for contaminated sites or listed buildings, or costs associated with brownfield, phased or complex sites. These costs should be taken into account when defining benchmark land value"***<sup>8</sup>
- 4.3.6 According to Table 1a of the Core Strategy, Bath and North East Somerset needed 3,290 affordable dwellings between 2011 and 2029. The Government live tables on affordable housing supply indicate that between 2011 and 2020, 2,221 affordable dwellings have been delivered in Bath and North East Somerset. While the AMR Housing Dashboard 2011-2020

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<sup>6</sup> Housing Trajectory March 2021 Standard Method <https://beta.bathnes.gov.uk/sites/default/files/2021-08/Housing%20Trajectory%202021.pdf>

<sup>7</sup> Planning Practice Guidance: Paragraph: 014 Reference ID: 10-014-20190509

<sup>8</sup> Planning Practice Guidance: Paragraph: 012 Reference ID: 10-012-20180724

states that only 1,821 affordable dwellings have been completed over the plan period up to April 2020<sup>9</sup>.

4.3.7 Therefore, over the remaining 9 years of the plan period between 1,069 and 1,469 affordable dwellings are still required. The reliance on brownfield sites to deliver this, alongside the fact that numerous sites within the housing trajectory do not have detailed planning permission at present may mean that this figure is not realised. Allocating further brownfield sites is unlikely to aid the delivery of such housing due to abnormal costs and the fact that the rate of delivery is at least 34% slower on brownfield sites than on greenfield sites<sup>10</sup>.

4.3.8 In this regard, Gladman consider that if BaNES continues to progress the LPPU, further greenfield sites should be allocated to ensure that the identified development needs of the area are met up to 2029. Section 5 of this representation highlights Gladman's land interest which are capable of delivering policy compliant levels of affordable housing alongside other benefits to support the delivery of new homes in the district.

## 4.4 New Policy NE3a: Biodiversity Net Gain

4.4.1 New Policy NE3a seeks to ensure that new major developments deliver a 10% net gain in Biodiversity.

4.4.2 Firstly, Gladman support the Council's approach to deliver Policy NE3a in line with the proposed Environment Bill which will impose a mandatory requirement for qualifying development to achieve a 10% net gain in biodiversity. However, it is acknowledged that the supporting text to Policy NE3a states that the Council will seek to set a requirement of 15% Biodiversity Net Gain through the full Local Plan Review.

4.4.3 Gladman consider that the Council should not look to set a requirement over and above the requirements set out in the Environment Bill which is likely to achieve Royal Assent in 2022 and the Local Plan Review should seek to align with legislation in place during its preparation.

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<sup>9</sup> Bath and North East Somerset Council Annual Monitoring Report March 2020 – Housing. Available at: [https://beta.bathnes.gov.uk/sites/default/files/2020-12/annual\\_monitoring\\_report\\_housing\\_dashboard\\_2020.pdf](https://beta.bathnes.gov.uk/sites/default/files/2020-12/annual_monitoring_report_housing_dashboard_2020.pdf)

<sup>10</sup> Litchfield's "Start to Finish (second edition)" (February 2020) available at: [https://lichfields.uk/media/5779/start-to-finish\\_what-factors-affect-the-build-out-rates-of-large-scale-housing-sites.pdf](https://lichfields.uk/media/5779/start-to-finish_what-factors-affect-the-build-out-rates-of-large-scale-housing-sites.pdf)



## 4.5 Policy H7: Housing Accessibility

- 4.5.1 Revisions to Policy H7 extend the accessibility requirements for new housing to apply M4(3) 2b standard to 7.8% of affordable units, with all other affordable units meeting M4(2) standard. The policy will require that 5.6% of private units meet M4(3)2a standard and 4.8% meet M4(2) standard.
- 4.5.2 Gladman acknowledge the importance of delivering housing to assist in meeting the needs of older people and those with mobility issues. However, it is important that policies of this nature are formulated on robust evidence to ensure that they represent a justified response to the needs of residents over the plan period. Indeed, the NPPF allows local authorities to make use of optional technical standards for accessible and adaptable housing, where this would address evidenced need<sup>11</sup>.
- 4.5.3 Furthermore, Eric Pickles' Written Ministerial Statement (2015) highlighted that the optional new national technical standards should only be required through the Local Plan process if they address a clearly evidence need and where viability has been considered<sup>12</sup>.
- 4.5.4 A Viability Study (August 2021) has been published to support the LPPU and includes reference to the aforementioned accessibility requirements, proposing that the appraisals indicate that they can be absorbed into the costs with little impact on residual values. Gladman consider that the document should provide further information to demonstrate viability, including clarity in the impact of such requirements on the residual land value and potential percentage profit following the cumulative application of all new policy requirements. At present it is difficult to ascertain whether a 15-20% of gross development value (GDV) return can be achieved once Policy H7 and other policy requirements are applied<sup>13</sup>.
- 4.5.5 In addition, the appendices appear to show that Policy H7 and new policy requirements including Biodiversity Net Gain cannot be viably delivered through housing schemes on higher and medium density land. The current spatial and development strategy which focuses development to brownfield land does not appear to have been considered in

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<sup>11</sup> NPPF (2019) Footnote 46

<sup>12</sup> Planning Update Statement made on 25 March 2015 <https://questions-statements.parliament.uk/writtenstatements/detail/2015-03-25/HCWS488>

<sup>13</sup> Planning Practice Guidance: Paragraph: 018 Reference ID: 10-018-20190509

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relation to the Policy H7 amendments and it appears unlikely that brownfield developments sites will be able to deliver the policy requirements. Gladman propose that further clarity is required in relation to the ability to viably meet the development requirements of the Policy H7 amendments on brownfield housing development sites.

- 4.5.6 Notwithstanding the above, Gladman welcome the amendments to the proposed requirements within Policy H7 which are justified through the Bath HMA Strategic Housing Market Assessment Volume ii (March 2019).

## 5 SITE SUBMISSION PROFILES

### 5.1 Land off Old Road, Writhlington

- 5.1.1 Gladman are promoting land off Old Road, Writhlington for the development of up to 255 dwellings, associated open space, landscaping, sustainable drainage system (SuDS) and car drop-off facility for St Mary's C of E Primary School alongside vehicular access points from Old Road and Frome Road. A location plan is included in this representation at Appendix 1.
- 5.1.2 The site will deliver a range of densities and housing types to meet identified local need, 30% of the units will be affordable to meet the requirements of the Bath and North East Somerset adopted planning policies.
- 5.1.3 The development will be set within a framework of open space and green infrastructure, including a formal locally equipped children's play area, extension to existing allotments and informal open space. The proposal will also retain existing landscape features alongside providing additional landscaping on the eastern area of the site through new tree and vegetation planting.
- 5.1.4 Gladman previously submitted an outline planning application for the development of up to 160 dwellings on the 12 December 2018 on the northern section of the site. The application was refused on 21 March 2019 with five reasons for refusal. Gladman has sought to address the reasons for refusal through the newly proposed scheme including a carefully considered and designed access point on Old Road, greater pedestrian connectivity and additional ecology surveys.

### 5.2 Land off Farrington Road, Paulton

- 5.2.1 Gladman are promoting Land off Farrington Road, Paulton for up to 130 new houses including 30% affordable units, associated open space, landscaping, sustainable drainage systems and new community allotments. A location plan is included in this representation at Appendix 2.
- 5.2.2 The proposals seek to retain existing landscape features and provides ecological and landscape enhancements in the form of new thicket and tree planting screening the development to west; the existing hedgerows are maintained where possible and any loss will be mitigated elsewhere on site.

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- 5.2.3 The site comprises three fields in agricultural use on the west side of Paulton, north of Farrington Road. It is well related to the settlement and the urban edge, to the west the site is contained by physical features with additional landscape buffering proposed. The proposed development represents a logical development within Paulton, which is not constrained by challenging topography
- 5.2.4 Gladman consider that the site is suitable for residential development in terms of location and characteristics with significant benefits arising from the delivery of affordable housing in an area with significant affordability issues.

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## 6 CONCLUSIONS

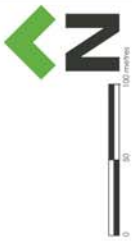
### 6.1 Summary

- 6.1.1 Gladman welcomes the opportunity to comment on the Bath and North East Somerset Local Plan Partial Update Regulation 19 consultation. These representations have been drafted with reference to the revised National Planning Policy Framework (NPPF 2021) and the associated updates that were made to Planning Practice Guidance.
- 6.1.2 Gladman have provided comments on a number of the issues that have been identified in the Council's consultation material and recommend that the matters raised are carefully explored during the process of undertaking the new Local Plan.
- 6.1.3 We hope you have found these representations informative and useful towards the preparation of the Bath and North East Somerset Council Local Plan Partial Update and subsequent Local Plan Review.
- 6.1.4 Gladman welcome any future engagement with the Council to discuss the considerations within forwarded documents.

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## APPENDICES

### Appendix 1: Location Plan Land off Old Road, Writhlington



Application Site Boundary: 18.34ha  
 Site within Bath & North East Somerset Council: 12.74ha  
 Site within Mendip District Council: 5.40ha

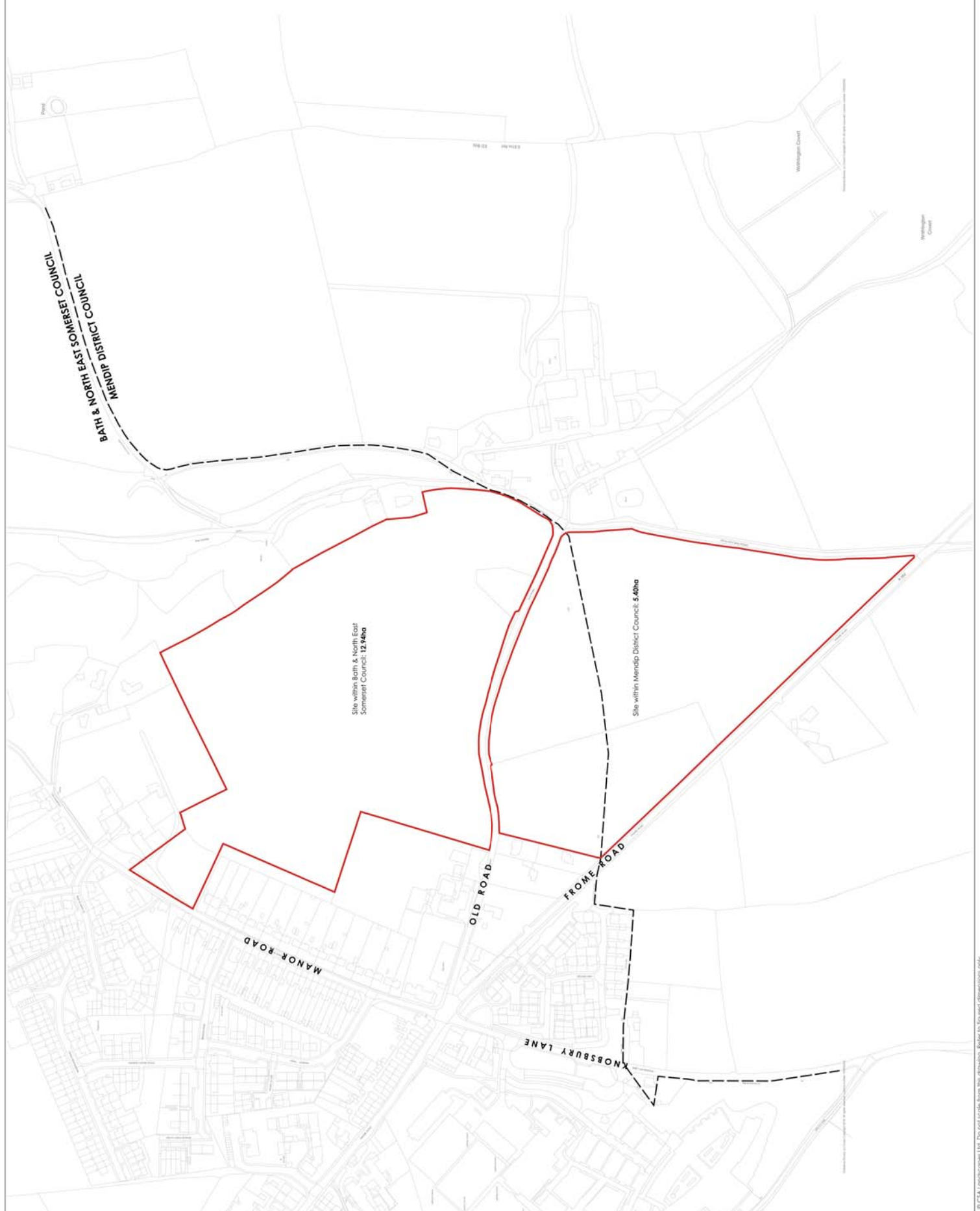
— Council boundary

Rev	Date	By	Description
D	30/09/21	SM	Amendment to plan
C	27/09/21	SM	Plan updated to show district council boundary
B	01/02/21	SM	Site boundary amended
A	20/11/18	SM	Updated to include additional land

**CSA**  
 environmental

Disas Bens, High Street,  
 Arnett, Herefordshire SGT SN7  
 01627 24347  
[www.csaenvironmental.co.uk](http://www.csaenvironmental.co.uk)  
[csa@environmental.co.uk](mailto:csa@environmental.co.uk)

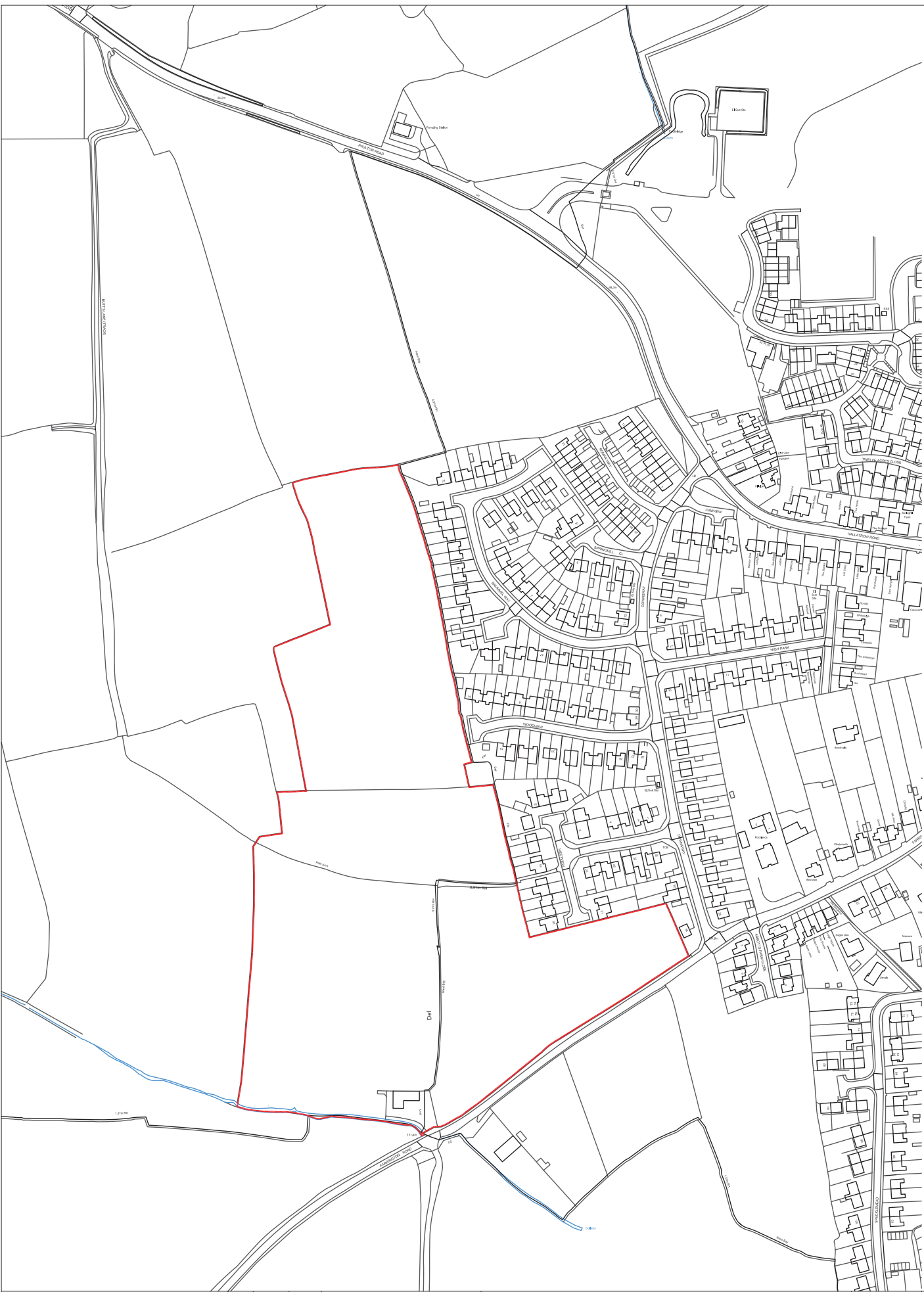
Project	Land off Old Road, Withington
Title	Site Location Plan
Client	Gladman Developments Ltd
Scale	1:2500 @ A2
Date	January 2021
Checked	RR
Drawn	SM
Rev.	D



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## Appendix 2: Location Plan Land off Farrington Road, Paulton





**GLADMAN**  
 Gladman House, Alexandra Way  
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 CW12 1JL  
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Rev	Date	By	Revision notes
*	*	*	*
<b>INFORMATION</b>			

Project  
**FARRINGTON ROAD, PAULTON**

Title  
**LOCATION PLAN**

Drawn by CLG	Issue date 23-07-2019
Title checked by CHECKED BY	This checked date CHECKED_DATE
Highways checked by CHECKED BY	Highways checked date CHECKED_DATE
Topo checked by CHECKED BY	Topo checked date CHECKED_DATE
Scale(s) <b>1:2500@A3</b>	
Drawing No <b>200</b>	



