

Statement of Common Ground

B&NES Core Strategy – Alternative Site at St
Francis Road, Keynsham

Landowners of 50, 52 and 54 St Francis Road, Keynsham
and
Bath & North East Somerset Council

February 2014

1.0 Introduction

- 1.1 In his note of 3rd January 2013 ([ID/44](#)) the Inspector outlined his requirements in terms of Statements of Common Ground that he would like to be prepared in advance of his preparation for the hearings in March/April 2014. He has also confirmed the dates and scope of coverage for these hearing sessions.
- 1.2 The Inspector has requested that the Council and the various owners/developers/promoters of the Green Belt sites proposed for allocation in the November 2013 Amendments should prepare Statements of Common Ground relating to delivery and environmental impact of those allocations as per the Council's proposals in the following revised policies:
 - B3A Land Adjoining Odd Down, Bath
 - B3B Land Adjoining Weston, Bath
 - KE3A Land Adjoining East Keynsham
 - KE4 Land Adjoining South West Keynsham
 - RA5 Land at Whitchurch
- 1.3 The deadline for submission of hard copies of these Statements of Common Ground to the Inspector is noon on 14th February 2014; the Council has a working deadline of **7th February** in order to ensure timely completion.
- 1.4 The Inspector has specified in ID/44 what the Statements of Common Ground, should include (but not be limited to), this template covers these issues accordingly:
 - Delivery: Availability/start on site/likely annual completions (assuming that the Core Strategy is adopted by Autumn 2014).
 - Evidence already submitted relating to the main documents, including the evidence from landowners/developers included in the Core Documents or submitted with representations to the November consultation.
 - The Statement of Common Ground should make clear which parts of evidence are agreed and where there is disagreement briefly the main reasons for that disagreement.
- 1.5 The Inspector has suggested that the Statements of Common Ground may need to involve parties not currently active in the Examination, but they will only have a right to be heard if they have already made representations at an appropriate opportunity. The Council considers that this relates primarily to landowners who have not previously been involved in the examination process prior to Nov-Dec 2013.
- 1.6 In addition, Statements of Common Ground between the Council and other promoters in relation to their suggested alternative or enlarged proposals are welcomed by the Inspector as separate submissions. This Statement of Common Ground relates to an alternative proposal.

2.0 Description of the site

- 2.1 The site is situated on the north western edge of Keynsham.
- 2.2 The site is c.1ha in size.
- 2.3 The site is c.600m from the edge of town centre.
- 2.4 The site comprises of three bungalows (which front the site and form part of the street scene) and their extensive rear gardens which are well vegetated.
- 2.5 Around one third of the site (where the bungalows are sited) is within the Housing Development Boundary and is not situated in the Green Belt.
- 2.6 Around two thirds of the rear gardens lie within the Green Belt and outside of the Housing Development Boundary.
- 2.7 Immediately adjacent to the east of the site lies Broadlands Academy, to the north and west are open fields that slope steeply down towards Stockwood Vale and to the south is residential housing (St Francis Road).
- 2.8 Part of the site starts to slope down into the valley.
- 2.9 The valley floor contains Charlton Bottom and Queen Charlton Watercourse Site of Nature Conservation Interest (SNCI) which is c.60m from the edge of the site.
- 2.10 A public right of way runs adjacent to the south west corner of the site to the valley floor.
- 2.11 The site is within Flood Zone 1.
- 2.12 The gardens of the site is classed as being situated within Historic Landscape Character Zone 3 (late medieval enclosure of steep-sided cultivation)>
- 2.13 See map included in **Appendix 1**.

3.0 Delivery

- 3.1 The site is included in the SHLAA as available with moderate to high 'suitability / credentials' (SHLAA, November 2013 - **CD10/E19** Appendix 1c – **Location K14** St Francis Road). The SHLAA estimates the potential to be 10 houses.
- 3.2 The site is also listed in the SHLAA November 2013 Housing Trajectory (2011-2029) as follows: 'K14 Land at St Francis Rd, 15 homes (10 market and 5 affordable)'.

- 3.3 The site is in the ownership of three separate families who state that it is available for development.
- 3.4 The landowners state that the site would be deliverable for development from 2016/17.
- 3.5 Broadlands Academy (whose site lies immediately to the east) has indicated to the landowners that they would have no objections to a small estate of houses in principle.
- 3.6 The landowners propose that 50 St Francis Road (which is a detached bungalow) would be used to provide vehicular access to the development via the current driveway.

4.0 Key relevant evidence

- 4.1 The key evidence prepared by the Council in relation to land at St Francis Road includes:

<p>Key evidence 2011-2012</p>	<ul style="list-style-type: none"> • Previous iterations of SHLAA • Green Spaces Strategy CD4/ENV3 • Rural landscapes of bath and North East Somerset, a Landscape Character Assessment SPD CD/UDL14 <p>NB Much of the earlier Core Strategy evidence is in part superseded by more detailed evidence prepared to support the allocations as outlined below.</p>
<p>Additional evidence to support proposed changes</p> <p>Submitted March -Sept 2013</p>	<ul style="list-style-type: none"> • Green Belt Review Stage 1 CD9/E2 • Affordable Housing Viability Study CD9/H1 • Infrastructure Delivery Plan CD9/I1
<p>Documents associated with the Core Strategy strategic site allocation</p> <p>Submitted Nov 2013</p>	<ul style="list-style-type: none"> • Bath and North East Somerset – Community Infrastructure Levy: Strategic greenfield allocations – viability testing CD10/E7 • Renewable Energy Assessment for B&NES Green Belt sites: Assessment CD10/E16 • Valuing people, place and nature – a Green Infrastructure Strategy for B&NES CD10/E17 • Strategic Housing Land Availability Assessment (SHLAA) CD10/E19 • B&NES 51
<p>Further evidence:</p>	<ul style="list-style-type: none"> • CH2M Hill Transport Modelling (forthcoming)

<p>Informs B&NES response to Nov 2013 consultation reps</p>	
<p>Assessments</p>	<ul style="list-style-type: none"> • Sustainability Appraisal Annex L – Locational Alternative Appraisal Matrices CD9/A1/5 • Sustainability Appraisal Matrices (Annex O) CD10/A1/3 • Previous iterations of the SA

5.0 Summary of Matters in Dispute

- 5.1 There continues to be dispute between the parties on the following matters:
- 5.2 The site at St Francis Road is identified in BNES /47 as a small, non-strategic Green Belt site, which may have some potential for development but which would need more assessment. BNES 51 paras 4.1 to 4.3 outline the Council’s current position in relation to non-strategic Green Belt sites on the edge of Keynsham. Para 4.3 states that these non-strategic Green Belt sites would make only a relatively small contribution to supply and are not needed for the five year housing land supply position, and must therefore be regarded as objection sites during the examination period. The landowners believe that this site can perform favourably when providing evidence in support of proving exceptional circumstances for its removal from the Green Belt.
- 5.3 The Green Belt Stage 1 Report (CD9/E2) assesses the land parcel that the site is situated in (Stockwood Vale, page 25-26). The Report states that the Green Belt designation across this entire land parcel is of high importance on the basis that it prevents the merger of Bristol and Keynsham and prevents the unrestricted sprawl of the urban area of Bristol. The Green Belt designation within this parcel also serves the purpose of protecting the countryside from encroachment and assisting urban regeneration. The landowners believe that this site can perform favourably when providing evidence in support of proving exceptional circumstances for its removal from the Green Belt.
- 5.4 The SHLAA (Nov 2013) states that *‘it would be difficult to develop here without loss of important skyline vegetation and the intrusion of built form into the attractive valley landscape which provides separation between Keynsham and Bristol. Loss of vegetation here would also potentially open up views to the larger Broadlands School buildings.’* The landowners disagree with this assessment, stating that the existing wildlife corridor that consists of many large mature trees and shrubs will remain in place, and be enhanced to mitigate any visual impact.

6.0 Declaration

- 6.1 The content of this document is agreed for the purposes of the B&NES Core Strategy hearing 2014.

Signed on behalf of 50, 52 & 54 St Francis Road, Keynsham, Bristol BS31 2DZ:

Barbara Feedi,

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Position:

Date: 12th February 2014

And

Signed on behalf of Bath & North East Somerset Council:

Richard Daine

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Position: Planning Policy Team Leader

Date: 13/02/14

Appendix 1: Site Plan

