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For the attention of Mr Chris Banks

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Dear Sirs

**BATH AND NORTH EAST SOMERSET COUNCIL (BANES)
EXAMINATION OF CORE STRATEGY
REPRESENTATIONS TO PRE-ENQUIRY RESPONSE FROM INSPECTOR**

We write further to the recent publication of the Planning Inspector's comments on the Draft Core Strategy Development Plan Document, to submit further representations, on behalf of Kraft Foods, in relation to the matters raised on Somerdale in Keynsham.

Inspectors Comments and Questions

In Paper ID/7, the Inspector raised the following comments in respect of Somerdale:

1. Are there reasonable prospects of the planned scale of housing within Keynsham being delivered as planned (explored more fully below)?
2. What is the evidential basis for the SHLAA trajectory for delivery of the sites at South West Keynsham and Somerdale?
3. What progress has been made on bringing forward the mixed use development proposed for Somerdale and the proposals at the Town Centre/Town Hall site?
4. What public funding is required to bring forward these two schemes and if so what is the commitment or expectation of such funds being available and when?
5. Are there any other strategic opportunities for development in Keynsham (excluding the Green Belt discussed under Issue 3) which should be highlighted in the Plan?

BNP Paribas Real Estate's Response

BNP Paribas Real Estate has been working with BANES for several years to bring forward the comprehensive redevelopment of Somerdale for a mixed use scheme. In respect of the Inspector's comments, we set out below our response to each question raised but only in respect of matters concerning Somerdale.



What is the evidential basis for the SHLAA trajectory for delivery of the sites at South West Keynsham and Somerdale?

Somerdale (now owned by Kraft Foods) ceased operations at the beginning of 2011 and is now vacant. However, in knowledge of the phased closure plans for the factory, BNP Paribas Real Estate has been working closely with BANES to put in place a positive planning framework to support the comprehensive redevelopment of the site for a mixed use scheme. This has involved:

- The preparation of a Vision for Somerdale to show how a comprehensive mixed-use development could be achieved on the site. This document comprises a range of development principles for the site that aim to create a unique place with a strong identity and a development which will integrate with and contribute to the regeneration of Keynsham Town Centre. The Vision identifies the potential for Somerdale to accommodate approximately 600 residential units and 20,000 sq m of employment floor space (to create up to 900 jobs) with sports and recreation facilities.

The preparation of the Vision involved extensive meetings with various stakeholders. The Vision was presented to and discussed with officers at Internal and External Gateway Group meetings and with members of Keynsham Development Advisory Group (KDAG). A Public Exhibition was also held in Keynsham in February 2009, where the Vision was shared with the local community and where positive feedback was generally received. Following this work, the Vision was also reported to BANES' Development Control Committee on 15 April 2009.

The Vision is supported by a range of background documents and technical work. This includes a Landscape Framework, reports on transportation, ecology, flood risk, ground conditions and service and infrastructure amongst others. These reports support the development principles within the Vision and do not identify constraints which would otherwise prevent development of this scale and nature coming forward. Further information in respect of the above exercise and/or the technical survey work accompanying it, can be provided upon request.

- Representations have been made by BNP Paribas Real Estate on behalf of Cadbury the former landowner and Kraft Foods the current landowner in relation to the draft Core Strategy, Strategic Housing Land Availability Assessment (SHLAA), the Economic Regeneration Delivery Plan (ERDP) for Keynsham and the Planning Obligations SPD. The representations confirmed that the site is available, deliverable and suitable for development and promote the development of Somerdale in line with the principles identified within the Somerdale Vision. In this context BNP Paribas Real Estate fully endorses the identification of Somerdale as part of a strategic development site within Policy KE2 of the Draft Core Strategy.

Based on the evidence outlined above, the draft Core Strategy (with proposed Minor and Significant Changes) September 2011 identifies Somerdale as a major development opportunity within Policy KE2 Keynsham Spatial Strategy which makes provision for up to 700 dwellings within the policy area. In addition, Somerdale is identified in the Policy for a mix of uses, including significant employment floorspace (which includes the uplift in office floorspace within Keynsham from 20,000 sq m in 2006 to 30,000 sq m in 2026 as required in Policy KE1), open space, leisure and recreational uses.

The Vision was also reviewed by urban design consultancy New Masterplanning as part of their work which informed both the draft Core Strategy policies and the Economic Regeneration Delivery Plan (ERDP) for Keynsham. The principles outlined in the New Masterplanning work for Somerdale included strategic opportunities for mixed use residential/commercial/leisure development; potential to convert some of the factory buildings; and improved green infrastructure connections.



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The ERDP for Keynsham notes that the site has the potential to provide in the order of 600 homes, about 20,000 sq.m of offices and creative work space, 20,000 sq.m of light industrial space, and new leisure facilities including a relocated Fry Club.

The most recent SHLAA Update Note November 2011, reinforces this position within the draft Core Strategy as it identifies that 'An announcement on sale is imminent. Housing potential of site likely to be refined via developer proposals during 2012. SHLAA estimate is currently 600'.

The evidence base for the SHLAA and the residential capacity for Somerdale has been extensively considered by officers at BANES, BNP Paribas Real Estate and the project consultant team and New Masterplanning as supported by the findings within the Somerdale Vision, the SHLAA, the ERDP and the Core Strategy which all reach consistent conclusions.

What progress has been made on bringing forward the mixed use development proposed for Somerdale and the proposals at the Town Centre/Town Hall site?

BNP Paribas Real Estate commenced the marketing exercise on behalf of Kraft to dispose of Somerdale in March 2011. The intension is for Kraft Foods to find a development partner who will be responsible for preparing detailed design proposals for the future development of the site.

As part of the marketing exercise BNP Paribas Real Estate produced a comprehensive marketing campaign which comprised the preparation of a marketing information pack and website to support the marketing exercise. A Planning Position Statement was prepared by BNP Paribas Real Estate and agreed with officers of the Council to assist potential bidders in understanding the planning position of the site. An indicative 'Route Map' setting out the broad process through which development proposals for the site are expected to be brought forward was also included in this document. A copy of the Planning Supporting Statement can be provided on request.

A number of potential interested parties expressed an interest in the site and a shortlist of successful bidders met with BANES to discuss their proposals. Following a detailed review of the short listed bids a preferred partner has been identified to take the site forward.

Since then, contractual discussions have been taking place between Kraft Foods and the preferred purchaser and it is anticipated that Kraft Foods will exchange contracts to sell the site to the preferred party on a conditional basis, in late December 2011.

Are there reasonable prospects of the planned scale of housing within Keynsham being delivered as planned?

The marketing process has progressed to an advance stage and Kraft Foods is due to exchange contracts to sell the site on a conditional basis (subject to planning) to the preferred purchaser in late December 2011. Subject to the conditional sale agreement proceeding, the programme for bringing the site forward is based on a planning programme of 12-15 months to obtain planning permission for the development. If this process commences in January 2012, there is a high possibility that planning permission could be delivered by early 2013 with initial phases of development being complete by the end of 2013.

The draft Core Strategy identifies that 700 units should be provided within Policy KE2 Keynsham Spatial Strategy within the policy area which includes Keynsham Town Centre and Somerdale. The most recent SHLAA Update Note November 2011, reinforces the position that 600 units can be accommodated on Somerdale and the SHLAA (May 2011) forecasts that 200 units could be delivered at Somerdale within the next 5 years from 2011 to 2016. We believe that this figure will easily be achieved if not exceeded.

Taking all the above factors into account, there are no known constraints which would prevent at least 200 units being delivered at Somerdale up to 2016 **with a further 400 or more units** being



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delivered thereafter on the remainder of the site. As previously identified in our representations, Somerdale is available, deliverable and suitable for development in line with the principles of PPS3. It is possible that the site could accommodate in excess of 600 units and on this basis could deliver the total quantum of housing projected for Keynsham.

What public funding is required to bring forward these two schemes and if so what is the commitment or expectation of such funds being available and when?

The key infrastructure requirements for Keynsham are identified in the Infrastructure Delivery Programme (IDP) as summarised in table 6 of the draft Core Strategy. This identifies key infrastructure investments and potential funding arrangements. BNP Paribas Real Estate is not aware of any other available funding arrangements and does not expect the development of Somerdale and its deliverability to be dependent on such funding.

Are there any other strategic opportunities for development in Keynsham (excluding the Green Belt discussed under Issue 3) which should be highlighted in the Plan?

BNP Paribas Real Estate does not consider that there are any other suitable sites within Keynsham for development to deliver the level of required housing within Keynsham.

We reserve the right to vary or supplement these representations.

We trust that these and our previous representations will be duly taken into account at the Examination in Public to support the future comprehensive mixed use development of Somerdale. Please would you acknowledge receipt of these representations and should you have any queries, please do not hesitate to contact John Bowles or Nicola Forster.

Yours faithfully

BNP Paribas Real Estate

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