



**BATH AND NORTH EAST SOMERSET
CORE STRATEGY EXAMINATION**

**ISSUE 2 SUB MATTER:
KEYNSHAM**

Pegasus Planning Group
Pegasus House
Querns Business Centre
Whitworth Road
Cirencester
Glos
GL7 1RT

Telephone: (01285) 641717 Facsimile: (01285) 642348

PPG Ref: CIR.R.0223

Date: 9th December 2011

COPYRIGHT

The contents of this document must not be copied or reproduced in whole or in part without the written consent of **Pegasus Planning Group Ltd**

7.1 Are there reasonable prospects of the planned scale of housing within Keynsham being delivered as planned (explored more fully below)?

- 1.1 The adopted Local Plan recognised that the town is suitable for significant levels of development (CD5/1) paragraph B1.3. The Core Strategy Information Paper “Settlement Classification” October 2009 confirms the identification of Keynsham as a Development Policy B settlement. The Information Paper states that Keynsham has the potential to be an attractive focal point serving the local community as a 21st Century market town.
- 1.2 The BANES Core Strategy (CD5/27) focuses on the delivery of new housing on brownfield sites. This is also true of the strategy for Keynsham.
- 1.3 The Core Strategy for Keynsham acknowledges that the town occupies a strategic location between Bristol and Bath and is therefore well placed to improve and attract investment. It will continue to act as a market town and a service centre for the surrounding area (CD5/27 The Spatial Vision page 6)
- 1.4 The Strategy acknowledges that the closure of the Cadbury Site which was a major employer is a significant loss to the town; however the Core Strategy envisages that the town will respond as a more significant business location. It is not clear how this will occur as the Cadbury site is included for a mixed use scheme, thus some of the current employment land will be lost as an opportunity for potential future investors.
- 1.5 The planned scale of housing for Keynsham is 1,500 dwellings; of which only 205 have been built during the first 5 years of the Core Strategy¹ i.e. 41 dwellings per annum. This leaves 1,295 dwellings to be delivered at 86 dwellings per annum for the remaining plan period. The deliverability of the sites at Keynsham is an issue, particularly as the Core Strategy is reliant on brownfield sites which are inherently difficult to bring forward in the current economic climate. The Core Strategy is anticipating delivering double the number of dwellings per annum.
- 1.6 The Core Strategy relies on the contribution from two sites allocated in the adopted Local Plan, K2A and K2B (530 dwellings) neither of which has come forward during the fifteen years of the Local Plan. It is only recently that K2B was granted planning

¹ CD4/H14 SHLAA May 2011 paragraph 2.19

- permission on appeal (the officers had recommended the site for approval and the Council had refused permission).
- 1.7 The Core Strategy is reliant on the brownfield site at the former Cadbury Factory, Somerdale, again this was allocated in the adopted Local Plan Policy K1 for the retention of the existing business uses and development of at least 10 hectares for business development (Use Classes B1 and B2 and/or B8) and about 50 dwellings during the plan period. The Core Strategy also relies on land towards the town centre in order to contribute to the residual requirement of 700 dwellings (Policy KE2)
- 1.8 PPS25 requires that Local Planning Authorities allocating land in LDDs for development should apply the sequential test to demonstrate that there are no reasonably available sites in the area with a lower probability of flooding that would be appropriate to the type of development or land use proposed. High level sequential tests were undertaken (CD6/D4). Topic Paper 7 (CD6/S8) also refers to the need for further sequential testing at the site allocation stage.
- 1.9 It is noted in Topic Paper 7 that the Environment Agency has indicated in its response to the Core Strategy that the Sequential and Exception Test Report (CD6/D2) has sought to justify locating development at Somerdale, despite part of the site being designated as Flood Zone 2. Topic Paper 7 states that there are no suitable alternative areas within Flood Zone 1 to facilitate the level and type of development required to support the regeneration of Keynsham Town Centre and redevelop the Somerdale site. This is because development in the Green Belt has not been considered.
- 1.10 In summary, the need to direct development into flood risk areas has been principally justified by BANES because of the level of development required and the strategy of developing brownfield sites as opposed to greenfield sites, the lack of brownfield sites wholly in Flood Zone 1 and other sustainable requirements of the Core Strategy that cannot be met by developing elsewhere.
- 1.11 What is at issue is the relative weight BANES have applied to the other sustainable considerations compared to flood risk, e.g. the benefits of greenfield land as opposed to brownfield and whether there are exceptional circumstances that would justify

development in the Green Belt (with higher levels of growth this had already been proven in the RSS paragraph 4.1.3²).

- 1.9 It is interesting to note the Environment Agency response (rep no 245) “*Given this the Inspector should ensure that they are satisfied that BANES have applied appropriate weight to these other sustainability considerations compared to flood risk, and therefore that this justifies locating new development in flood risk areas.*”

² CD3/6 Draft Revised Regional Spatial Strategy for the South West including the Secretary of State’s Proposed Changes (July 2008).

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

1.1 The SHLAA has dismissed the Green Belt sites as contrary to policy. The SHLAA sites correspond to 39 dwellings more than the provision in the Core Strategy of 1,500 dwellings over the plan period; consequently there is virtually no flexibility in terms of delivering a flexibly supply of land for housing in accordance with PPS3 paragraph 52 as 39 dwellings is only 2.5% of the total requirement. The Draft NPPF (July 2011) states at paragraph 109 that in order to boost the supply of housing, local planning authorities should :

“...identify and maintain a rolling stock of specific and deliverable sites sufficient to provide five years worth of housing against their housing requirements. The supply should include an additional allowance of at least 20% to ensure choice and competition in the market for land.”

1.2 The SHLAA indicates for K2B (Eastern) that the development will start in 2012/13 with 42 dwellings and continue at around the same figure until the site is completed in 2018/19. The Somerdale site K1 is anticipated to start in 2014/15 with 75 dwellings which is anticipated for each year until 2021/22.

7.3 *What progress has been made on bringing forward the mixed-use development proposed at Somerdale and the proposals at the town centre/Town Hall site?*

- 1.1 This question is more relevant to the Council, the only evidence which is in the public domain is the Planning Position Statement produced by BNP Paribas Real Estates in March 2011.
- 1.2 The Council's Topic Paper 2 (CD6/S3) dated May 2011, provides an update that Kraft was seeking expressions of interest in the sale of the site by May 2011 and anticipate having a partner on board by autumn this year.
- 1.3 Topic Paper 7 (CD6/S8) dated August 2011 provides an update on Keynsham and Somer Valley Site Capacities and Delivery. It is noted that the capacity of K13a Town Hall and K13b have been reduced from 50 to 20 dwellings and from 75 to 35 respectively (CD4/H14).
- 1.4 The SHLAA update November 2011 does not provide any further information apart from part of K1 (the original Local Plan allocation has been granted planning permission on appeal for 285 dwellings) and the potential of the Somerdale site will be refined by development proposals during 2012, this does not provide any further certainty about the deliverability of this brownfield site.

7.4 Is public funding required to bring forward these 2 schemes and if so what is the commitment or expectation of such funds being available and by when?

1.1 This question is more relevant to the Council.

1.2 Pegasus Planning Group maintains the view that there should be a choice of sites brought forward through the Core Strategy consistent with PPS 3 paragraph 9. Brownfield sites are inherently more difficult to bring forward and deliver the housing within the plan period.

7.5 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?

- 1.1 There are no other strategic opportunities within the development boundary of Keynsham that could make a contribution to housing need within the plan period over and above the key development sites included in the Core Strategy, without examining sites in the Green Belt. The SHLAA report of May 2011 (CD4/H14) acknowledges in paragraph 2.20 that there is limited potential for the intensification of the suburban area of Keynsham.
- 1.2 The SHLAA indicates that there are two key development sites with planning permission amounting to 285 dwellings. The key development sites which do not have planning permission are K2A from the adopted Local Plan for 245 dwellings and K1 the Somerdale site identified in the Core Strategy for 600 dwellings.
- 1.3 Those sites that have been built since the start of the plan period contribute 90 dwellings and there are large sites with planning permission for 60 dwellings. 115 dwellings have been built on small sites to date and there are small sites with planning permission for 54 dwellings as at 31st March 2010.
- 1.4 The sites within the Green Belt in the SHLAA are assessed, but dismissed as the Council considered that they are unsuitable for strategic policy reasons. The RSS CD3/6 identified an area of search around the whole of Keynsham; however the 360 degree assessment was not undertaken by the Council. The issue of development in the Green Belt is addressed under Issue 3.