

REP/184/009

**Chris Banks**

**From:** Davis, Paul [REDACTED]  
**Sent:** 14 March 2014 16:19  
**To:** chris.banks@zen.co.uk  
**Subject:** Bath and North East Somerset Core Strategy Examination - Persimmon Homes Severn Valley Rep 184

Persimmon Homes Severn Valley wish to make the following comments in response to the Inspector's issues set out in ID/46

**THURSDAY 27 MARCH – 2 GENERAL GREEN BELT ISSUES; SAFEGUARDED LAND TO BE REMOVED FROM THE GREEN BELT**

Notwithstanding the Green Belt review carried out by the Council for this Core Strategy, we consider the review was too narrow in its outcomes, which do not fully and consistently consider safeguarded land. therefore NPPF83 is not satisfied. How can it be right to identify safeguarded land at East Keynsham, reject it at South West Keynsham (albeit based on flawed evidence) but postpone it for consideration in the review at Whitchurch, without a full assessment of the amount of safeguarded land necessary to accommodate future needs?

The issue then is how this should be addressed. The prospect of an early review, providing that is quite specifically set out, provides the opportunity for the issue to be fully and properly re-examined in the context of an NPPF compliant SHMAA for all the West of England authorities or, in the event that B&NES is not included in that, through the proper application of the Duty to Co-operate to resolve strategic matters. The alternative is that this Core Strategy remains unresolved until the new SHMA produces results. PHSV do not have a preference for which of these routes is followed (which will be effectively determined by balancing a number of issues, only that the issue of safeguarding land should be resolved.

This is also necessary because it is clear from the evidence collected by ourselves and Redrow which demonstrate land west of Keynsham was rejected due to the incorrect route and parameters for assessing the high pressure gas main being used. This has prejudiced the option for including land west of Keynsham, either within an enlarged allocation or as safeguarded land.

**3 APRIL – STRATEGIC ALLOCATIONS/SAFEGUARDED LAND, KEYNSHAM SOUTH WEST – LAYS FARM AND SOUTH WEST KEYNSHAM**

PHSV reiterates its previous comments. In order to consolidate the Green Belt boundary south and west of Keynsham, it is logical to link the existing development at Lays Farm, with or without the proposals being brought forward by Redrow Homes South West, with the proposed KE4 allocation, either as proposed by the Council in the Core Strategy or the wider site as proposed by Bloor Homes South West. This is irrespective of whether this is through a specific allocation or as a more diagrammatic safeguarding area, subject to further investigation. In that respect Persimmon Homes Severn Valley support the following Statements of Common Ground: BNES/53I (Bloor Homes SW and B&NES), BNES/53P (Bloor Homes SW and B&NES) and BNES/53X (Redrow Homes SW and B&NES).

In respect of those statements we have the following brief comments:


BNES/53X – we are not clear what the Council's position is on the capacity of the site which appears to be agreed at paragraph 5.5 but disagreed at paragraphs 6.2 and 6.4. PHSV consider the capacity of the site is 150 dwellings

In conclusion, PHSV agree that land at SW Keynsham has the potential to accommodate more than 200 dwellings, that additional land should be released in order to safeguard land for development in the long term consistent with the Council's own evidence base, that land at Lays Farm is capable of delivering 150 dwellings without unacceptably compromising the purpose of the Green Belt and given that, it is entirely logical to provide for a consolidated extension south and west of Keynsham, including and linking land at SW Keynsham and Lays Farm.

Paul Davis  
Strategic Land Director

**Persimmon Severn Valley**

20/03/2014



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