

Bath and North East Somerset Local Plan

Housing and Economic Land Availability Assessment

Findings Report

(April 2015)



Housing and Economic Land Availability Assessment Findings Report

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Appendices

This report summarises the site assessments that have been undertaken. It should be read alongside:

- Appendix 1a: Site assessments and plans for land within Bath
- Appendix 1b: Site assessments and plans for land in the Green Belt adjoining Bath
- Appendix 1c: (i) Site assessments and plans for land within Keynsham
(ii) Site assessments and plans for land in the Green Belt adjoining Keynsham
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- Appendix 1e: Site assessments and plans for land in the Green Belt to the South east of Bristol
- Appendix 1f: Site assessments and plans for rural villages.
- Appendix 2: A housing trajectory for each main settlement /area and for the district as a whole, showing past performance, estimating yearly delivery for individual sites and the cumulative effect of this on overall anticipated delivery rates. In effect this shows how the housing delivery strategy will be implemented.

Introduction

- 1.1 The Housing and Economic Land Availability Assessment (HELAA) is a key component of the evidence base to inform the preparation and review Local Plan. A strategic assessment of housing land availability is required by the National Planning Policy Framework (paragraph 159). The HELAA presents a strategic picture of the availability and suitability of land for development. Further, it attempts to establish realistic assumptions about the number of homes that this land could yield and the timeframe within which this might come forward. Detailed Guidance on the purpose of the HELAA and its preparation is given in the Planning Practice Guidance.
- 1.2 The HELAA also plays an important role in the plan monitoring process, providing evidence of the level and distribution of past housing completions and on the sites that can contribute to the district's rolling five year housing requirement. This is important information for the Council's Development Management function in respect of determining planning applications for housing in respect of NPPF: 49.
- 1.3 This version of the HELAA accompanies the Adopted Core Strategy (July 10th 2014).

National Planning Policy Context

- 1.4 NPPF (47) requires that local planning authorities to boost significantly the supply of housing and that they should:
- 1.5 *Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far is consistent with the policies set out in the Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period*
- *Identify and update annually a supply of specific deliverable site sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice an completion in the market for land. Where there has been a record of persistent under delivery of housing, LPAs should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land.*
 - *Identify a supply of specific deliverable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.*
 - *For market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period¹ and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target.*
- 1.6 Footnotes to NPPF (47) explain that ‘ *to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evince that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans*

¹ See appendix 2

- 1.7 Rather than prepare a **Housing Implementation Strategy** as a separate document this requirement is fulfilled within the HELAA itself. Appendix 2 sets out a deliverable trajectory for the next 5 years and beyond. Against these projections, the current and forecast future 5 year land supply position is calculated. Maintaining a rolling 5 year land supply of deliverable sites requires that it be topped up each year (with a 5%-20% buffer depending on the circumstances). Therefore, the current sixth year will soon become next year's fifth year and to maintain a 5 year supply means looking ahead and enabling/securing medium term land supply.
- 1.8 For 2015/16 a 20% buffer is applicable due a shortfall in housing delivery during the first four years of the Core Strategy period, and previously during the period 2001-2011. The Development Plan's annualised requirement is 722 per annum over 18 years. The interim target for the end of year four (2014/15) was 2,888 dwellings but only 1,558 have been completed (72% of target).
- 1.9 NPPF (48) advises that LPAs may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the HELAA, historic windfall delivery rates and expected future trends, and should not include trends in residential garden development. The Council includes such an allowance and this is evidenced in Section 3 of this report and is supported by the Core Strategy Inspector's Report. The Council also makes an allowance for windfall beyond the next 5 years.

Purpose and caveats

- 1.10 The HELAA is an important evidence source to inform Plan-making, but does not in itself determine whether a site should be allocated for housing development or whether planning permission should be granted. The allocation of a site for development can only be made in the Local Plan. The Plan-making process will determine which suitable sites should come forward for development and for what level of development. HELAA's typically identify more suitable, available and achievable land than is required to meet the objectively assessed need for housing. Therefore, only the most suitable and sustainable sites will be selected for development in Plan-making.
- 1.11 Although sites can only be allocated in the Local Plan, planning applications must still be determined during the preparation of a Plan and via the Development Management process. This can relate not only to sites that the Council is considering allocating, or has allocated, but to sites that are contrary to an emerging or adopted Plan. Where there is evidence that a Council does not have a 5-year housing land supply it is likely that planning applications beyond the framework set by the emerging or adopted Plan will be submitted.
- 1.12 The HELAA is not the Council's last word in respect of site analysis for Development Management purposes. Due to the scope of the SHLLA the Council has not assessed every site to the extent that would be required to support a planning application. The resource implications are too great. It can provide a view on suitability & capacity based the strategic level of analysis undertaken, which is proportional to the primary task of the HELAA which is to assist in plan-making and to evidence, broadly speaking, what a settlement, might be able to achieve in respect of growth.
- 1.13 The scrutiny of a sites suitability & capacity credentials can and will increase during the Development Management process. There should not be too much variance between an assessment in the HELAA and the Development Management view (although the HELAA should not be read as pre-application advice, which should be routinely sought). However, for some sites the judgement as to whether it is suitable (or how suitable it is) can be finely balanced, involving a range of considerations.
- 1.14 The Development Management process will involve a more nuanced assessment of each site and benefit from being able to assess suitability in respect of a real proposal rather than hypothetical impact. This additional information/scrutiny may reveal that different parts of a

site have different tolerances to the impact of development, that only some parts are actually suitable, or that the capacity is more or less than that set out in the HELAA.

Methodology

- 1.15 The geographic scope of the HELAA covers:
- Land within Bath and the Green Belt adjoining Bath
 - Land within Keynsham and the Green Belt adjoining Keynsham
 - Land in the Green Belt to the South East of Bristol, including that which immediately adjoins Whitchurch village.
 - Land within and adjoining Midsomer Norton, Radstock, Paulton and Peasedown St John – collectively referred to as the Somer Valley in the Core Strategy.
 - Land within and adjoining the following RA.1 settlements, completely surrounded by Green Belt: Batheaston, Bathampton, Bathford, Farmborough and Saltford.
 - Land within and adjoining the following RA.1 settlements not completely surrounded by Green Belt: Bishop Sutton, Clutton, High Littleton, Temple Cloud, Timsbury, and Farmborough
 - Land within and adjoining the following RA.2 settlements
- 1.16 The HELAA comprises assessments of land parcels promoted by developers and landowners within and adjoining the housing development boundaries identified in the BANES Local Plan. The Council has also assessed land adjoining housing development boundaries where there has not been a developer/landowner submission. This is because it is not always the currently available sites that are the most suitable sites for development and it is part of the Councils enabling role to pursue the most sustainable opportunities (as far as they are achievable).
- 1.17 Therefore, the HELAA attempts to provide a comprehensive 360 degree assessment of all the land adjoining a settlement where resources permit. This is a 'live' and on-going process. For example, the Council is now working towards comprehensiveness in respect of some of the lower tier villages and is working with Parish Councils to achieve this. The picture of land availability is fluid as the status of sites change e.g. planning permission is granted or refused. Moreover, land continues to be presented to the Council on an ad hoc basis as landowners learn of an engage with the Plan-making process, make pre-application enquiries or submit planning applications.
- 1.18 Beyond the settlements listed in 1.7, the Council has not actively sought to identify sites for housing the as remaining villages are washed over by Green Belt and no not have a housing

development boundary. However, completed developments and existing planning permissions in the smallest rural settlements will still contribute to identifiable supply for the Core Strategy period and to 5-year land supply. Such settlements also contribute in a small way to the windfall; allowance for the rural areas.

- 1.19 Whilst no stakeholder panel has been convened during the preparation of the HELAA, the findings are open and transparent and enable interested parties to critically review the outputs and relay any observation to the Council for consideration. In some cases there may be a difference in planning judgement in respect of the suitability, capacity or deliverability of a site. The Development Management process or Place-making Plan will determine the precise yields of individual sites.
- 1.20 The Council has contacted developers, whose sites form part of the housing delivery trajectory in order to make reasonable assumptions about when development might take place. Further, the current version of the HELAA was tested at Core Strategy Examination in March 2014 and the Inspector Reported to the Council in June 2014 that “ *the HELAA provides robust evidence that the adoption of the CS would ensure that there is a five year plus 20%) supply of housing on an on-going basis*”.
- 1.21 The HELAA has its own particular lexicon i.e. **suitability, availability, achievability**. These terms are defined in the [Planning Practice Guidance \(CLG, 2013\)](#).
- 1.22 In making judgements about the degree of harm that is acceptable before a site is assessed as being unsuitable the HELAA has had regard to, inter alia NPPF:14. This sets a high bar i.e. “Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the Framework as a whole;
 - or specific policies in the framework indicate development should be restricted (*listed at footnote 9 to the Framework*)

Key findings of the assessment – bringing together appendix 1 and 2

- 2.1 The assessments in Appendix 1 (which remain a little out of step with facts on the ground and current planning processes) set out the Councils view of the housing potential, suitability, availability and achievability of many sites across the District. Some are brownfield sites, others greenfield sites (including Green Belt). The sites are a range of sizes, from infill sites that would accommodate at least 10 units to large Green Belt areas that could yield 1,000+
- 2.2 The following section is a ‘walkthrough’ of these assessments (yet fully reflecting the facts on the ground and in terms of planning processes) and presents a summary of the land supply situation, identifying the key sites that can play in the future growth of BANES and those areas that are not deemed suitable. The focus is initially on the more strategic sites at the District’s main urban areas (bath, Keynsham, Somer Valley, and the edge of Bristol) particularly where most complexity or uncertainty in respect of their suitability, achievability and timetable for delivery. There then follows a section on the rural areas , covering more and less sustainable villages.
- 2.3 This HELAA accompanies Core Strategy that has been adopted (as opposed to informing one in preparation). The suitable and available sites that are part of the housing land supply for the Plan period are presented in the housing trajectory (Appendix 2). This presents capacity and delivery assumptions on all sites that are expected to yield housing in the next 5 years (and beyond to 2029).

Land within and adjoining Bath

- 2.4 As part of Policy B1 of the Core Strategy, the Development Plan seeks to increase the number of homes in Bath by 7,000. The 2015/16 HELAA concludes that land at Bath (including that removed from the Green Belt for development) can deliver 7,116 houses between 2011/12 and 2028/29. This comprises:

Large and small sites built 2011/12 -2014/15	1,011
Large sites with planning permission (not all deliverable in the next 5 years)	3,108
Small sites with planning permission	225
Small windfall sites	663
Other large deliverable brownfield sites without permission	698
Other large developable brownfield sites without permission	1,111
Land removed from the Green Belt in the Core Strategy, without permission	300
Total	7,116

- 2.5 The housing trajectory (appendix 2) presents this information on site specific basis, year by year. The following paragraphs explain the current position in respect of some of the key sites that are central to the delivery of the Plan and 5 year housing land supply

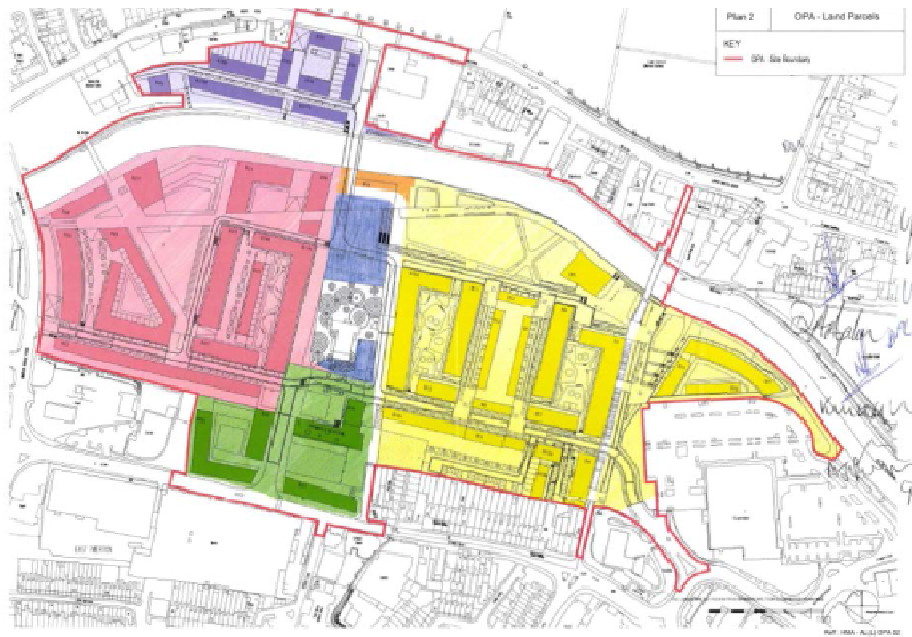
Western Riverside

- 2.6 Bath Western Riverside is a residential-led allocation of saved BANES Local Plan (2007) policy GDS.1/B1. It can be divided into three broad areas:
- A core area that is being developed by Crest Nicholson
 - An eastern area that is occupied by Sainsbury's, Homebase and the Pinesway Gyrotory,
 - A strip of land along the northern bank of the River Avon.

Western Riverside Core Area – Crest (Wes.1a, b & c)

- 2.7 The largest single site within the Western Riverside allocation is being developed by Crest Nicholson and outline planning permission was granted for the development of this part of the site in December 2010 for up to 2,281 flats and townhouses (06/01733/EOUT).
- 2.8 Although the outline permission allows for up to 2,281 dwellings, a masterplan that accompanied the outline application accommodated closer to 2,000 dwellings. This number could change within the parameters set by outline consent when applications for later phases take on board lessons learned from the earlier phases. On a site of this nature, being developed over a long period, there can also be other issues that arise during implementation that affect the arrangement of uses on the site, for example the immediacy of availability, the viability of securing land at different times (leases and CPO costs) and the location of the primary school
- 2.9 Figure 1 shows the outline application masterplan for the site and the strategic development phases (identified in yellow, blue, green, red and purple). The yellow, blue, red and purple areas are very much residential-led within the outline application masterplan. The green area is identified for a school and student accommodation. The yellow and blue areas represent the first strategic phase of development and it is progress within this area that is discussed first.

Figure 1, Western Riverside Masterplan & Strategic Phases



- 2.10 At the same time as outline permission was granted, reserved matters were approved for the first sub phase of development within the yellow area. This comprised 299 homes within buildings B3a, B4, B7, B8, B10, B10a and B10b ([06/04013/EFUL](#)). These buildings have been completed.

- 2.11 In April 2013 reserved matters were approved for 26 houses and apartments within buildings B1 and B2 ([12/05590/ERES](#)). This area forms the eastern limit of the Crest outline application area as it adjoins the car park of Homebase (which is part of Western Riverside East – see 2.25). Construction of this area is nearly complete.

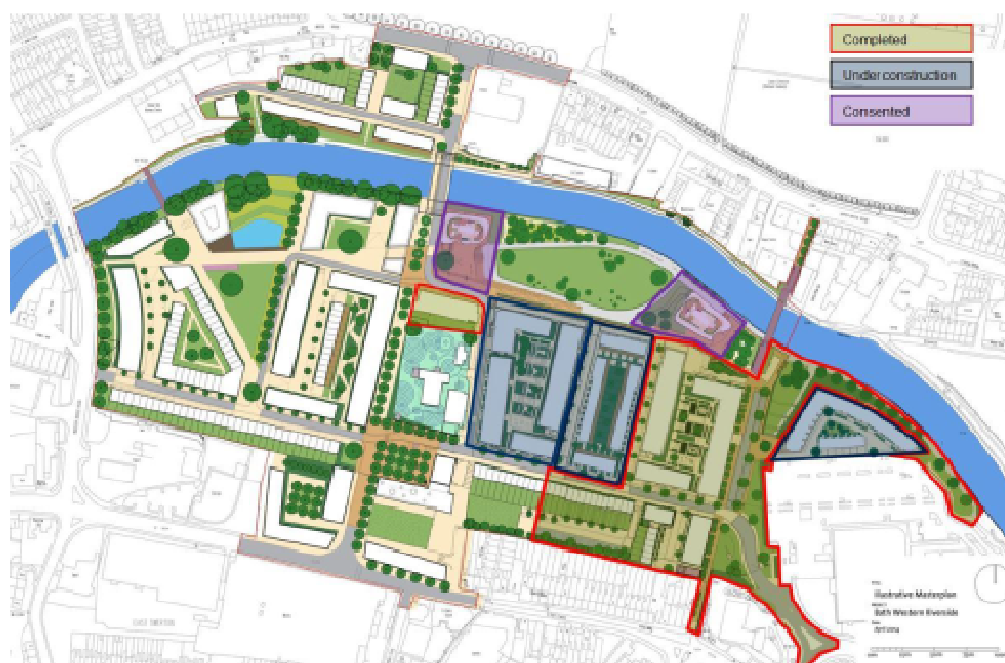
- 2.12 In April 2013, reserved matters were approved for building B17 ([12/05387/ERES](#)). This is an affordable housing block of 55 apartments on the blue land (effectively yellow land). This was completed during 2014/15.

- 2.13 In December 2013 reserved matters were granted for buildings B11, B13, B15a and B15b ([13/03929/ERES](#)). The capacity of these blocks is 259 (238 market & 21 affordable) and they are under construction.

- 2.14 In January 2014, reserved matters were granted for blocks B6 and B12 for 38 townhouses ([13/04574/ERES](#)). The first six were completed in 2014/15 and the remainder are under construction.

- 2.15 In December 2014, reserved matters planning applications for buildings B5 and B16 for 97 apartments ([14/02005/ERES](#)) were permitted. These, together with building B27 (part of a later phase) occupy the most prominent riverside locations within the masterplan.
- 2.16 A planning application will be submitted soon for block B10c which will yield 11 townhouses.
- 2.17 Crest expect to deliver the capacity identified in paragraphs 2.8-2.14 (785 dwellings) by October 2018. Of this 419 units will form part of the contribution if this site to 5 year land supply between 2015/16 and 2019/20. This capacity relates to the land that is currently in the control of Crest (the yellow area). Further, Crest will secure and submit further reserved matters on the red land to enable continuity of delivery in to the future. The red land is scheduled to deliver a further 355 units from 2017/18 to 2019/20.

Figure 2, Western Riverside Development Status April 2015



- 2.18 Building B17 and most of the remainder of the other buildings within Crest's secured land area previously fell within an HSE exclusion zone in respect of the Windsor Bridge Gas Holders. The occupation of these buildings could not take place until the gasholders were decommissioned and Wales and West Utilities surrendered their gas storage licence to BANES Council. This took place in Autumn 2013. Further development phases (on National Grid owned land) require the actual removal of the gasholders and associated land remediation. The removal of the gasholders was completed in November 2014.

- 2.19 The cost and time required to decommission and remove the gasholders and to remediate the land has been a significant barrier to the delivery of the secured & unsecured land and has also affected other sites within BWR and Twerton Riverside, such as the Bath Press. Crest, working in partnership with BANES is utilising £4.1m of funding from The West of England LEPs Revolving Infrastructure Fund (RIF) to address this matter, with Wales & West Utilities, the owner of the facility undertaking the works.
- 2.20 The position in respect of the RIF was presented to [Cabinet on April 10th 2013 \(item 188\)](#). The report to Cabinet demonstrated that a timely resolution in respect of enabling the development of the unsecured land could be achieved and this remains the case. Now that the facility has been decommissioned and demolished, decontamination and the removal of associated infrastructure is expected to be completed to a sufficient extent early in 2016, which can then allow further development in phases.
- 2.21 An additional barrier to the complete delivery of the secured land delivery would have been reached upon the completion of the 650th home in respect of the S106 trigger of providing a new ‘Destructor’ bridge for two-way traffic and pedestrians across the Avon. This too is being addressed, in part, with RIF funding. A Corporate agreement between Crest and BANES contracts the Council to contribute £1.7m towards the Bridge. This will be drawn down from the RIF in tranches between 2013/14 and 2015/16 to fund construction. The S106 Agreement provides a contractual commitment on Crest to repay the cost of the bridge on completion of the 650th unit. Full repayment is expected in 2017/18. A planning application ([13/01649/ERES](#)) was permitted in July 2013 for the demolition of existing Destructor Bridge and the construction of the replacement bridge.
- 2.22 The housing delivery trajectory from 2015/16-2019/20 (786 dwellings) reflects the programme to decommission the gasholder facility, the works on the Destructor bridge and the construction and sales intent of Crest. The next strategic housing phase will move into the former gas storage area (the red land). Crest, as part of the decommissioning contract with Wales & West Utilities has secured an option to purchase its land. Negotiations between the National Grid and Crest are also progressing and a delivery strategy for the remaining consented land has been agreed in principle with BANES Council. Provisions also exist within a Corporate Agreement between the Council and Crest for the use of CPO powers if necessary and viable.

- 2.23 Planning condition 44, accompanying the outline application requires that not more than 1,250 units be occupied until a single form entry primary school is provided on the *green* land. The *green* land is currently occupied by car show rooms and is in separate ownership. This land is also earmarked within the masterplan for student accommodation. It has not yet been secured and it is understood that CPO costs would not currently be viable due to the way that the leases on the *green* land are structured (to maximise CPO costs). We return to this issue at paragraph 2.26 below.
- 2.24 Given that the capacity of the yellow and blue land is 790 it means that not more than about 460 more units on the red land can be occupied until the school has been built. Using delivery as a proxy for occupation. There is a time lag between delivery, sales and occupation, and the 1250th units is programmed for delivery towards the end of 2021/22 and so occupation would be in 2022/23. Condition 44 also stipulates that not more than 1,150 units be occupied until the LPA has approved a scheme for the provision of the school.
- 2.25 Progression into the wider consented land is likely to take place earlier than originally programmed with strong demand on Phase 1 (the *yellow* land) driving this part of the project to complete early. Subject to the successful conclusion of negotiations between Crest and National Grid, residential construction can commence on the red land, enabling continuity of housing delivery as per the HELAA housing trajectory (April 2015). The inclusion of delivery within the red land within the next 5 years reflects Crest current intent.
- 2.26 There is a reasonable prospect that Crest will abandon the *green* land earmarked for student accommodation and the primary school. The immediate costs of securing it may render it unavailable to do so. That means that Crest will have to (and are going to) seek to change the masterplan for the red land (via further reserved matters applications that do not accord with the masterplan, yet are within the parameters set by the outline consent) so that the school can be developed on the red land. That could place downward pressure on the residential capacity of the red land (unless changes to the housing mix are put forward to counter this). Crest is understood to have received legal advice that further reserved matters application on the red land can come forward within the context of the current outline consent (via S.73) as the masterplan was not set in stone. The S.106 accompanying outline consonant may need to be renegotiated. The site is exempt from the CIL.
- 2.27 Part of the outline consented land relates to the Council's waste facility on the Upper Bristol Road (the *purple* land). The relocation of this is progressing as the Council has identified a

selection of potential replacement locations. Relocation still requires planning approval, but the Plan period still has 15 years to run and it is highly likely that this matter will be addressed in time to enable the delivery of this area.

- 2.28 The corollary of the primary school not being located on part of the green land is that this land can be regarded as a developable for residential development later in the plan period.

Western Riverside – Eastern Area (Wid.23 a, b ,c / King 6)

- 2.29 The eastern part of the Western Riverside allocation was subject to a planning application for a supermarket-led development by Sainsbury's in February 2013 ([13/00983/EFUL](#)). This was withdrawn in September 2013, but a revised scheme was expected from the correspondence received in respect of withdrawal. However, this has not been forthcoming. The withdrawn application proposed that the existing Sainsbury's store (King.6) relocated to the current Homebase site (Wid.23a) and that the existing Sainsbury's store remained in A1 use. It also proposed about 300 dwellings and office space.
- 2.30 Sainsbury's do not control all of the land within the planning application area. Homebase currently have a lease with British Land to remain on their site until 2020. This would have delayed the implementation of planning permission if it was granted. Given this uncertainty the housing trajectory does not allow for any housing delivery here until the end of the plan period. Further, it now seems unlikely that Sainsbury's will pursue a move to the Homebase site. Since withdrawing their planning application they have announced a reduction in capital expenditure and a Goldman Sachs report on the UK grocery market (albeit not locally specific) suggests that a large space expansion is not likely in the foreseeable future. This has been confirmed elsewhere in the District where interest from ASDA in Midsomer Norton has faded. According to the promoter of that scheme (Terrace Hill /Urban Civic)) there is currently no market for main stream supermarket development.
- 2.31 Further to the adoption of the Core Strategy the Placemaking Plan is now being prepared to develop a planning framework for the redevelopment of this area. The Placemaking renames proposes to rename this area Sydenham Park (west of the river) and (Green Park (east of the river). An Options consultation was undertaken between November and January 2014-15. The Councils preferred Option is scheduled to be published for consultation towards the end of 2015. The Council will continue to engage with all key landowners in the preparation of the Draft Plan.
- 2.32 The Sainsbury's planning application area excluded the Pinesgate 'gyratory' element of BWR East. This is owned by 'Ediston Real Estate' and is currently in office use (partly vacant) with dedicated car parking (Wid.23c). The application area also excluded some dated commercial units on James Street West (King.6). However, these locations are also available for redevelopment.

- 2.33 The Pinesgate Gyrotory site was promoted by Ediston during the preparation of the Core Strategy for retail use and car parking. The eastern half of the site has recently subject to an office redevelopment scheme (14/02619/FUL) achieving a significant net gain in floorspace. This was refused at February 2015 Development Control Committee on account of building heights and materials. It was deemed acceptable in principle. There may be role for the western half of the site here in respect of the future of Homebase but his requires further exploration. Again, the Placemaking Plan is now being prepared to refine and develop a planning framework for the redevelopment of this area. There is no 5 year housing land supply capacity identified at BWR East at this time.
- 2.34 Much of the James Street West now has planning permission (as of April 2015) for 169 student bed spaces ([14/02412/FUL](#)) although these would not count towards the Local Plan housing target (which is net of a separate student housing target). The proposal relates to two of the three commercial buildings at this location. The building that hosts the NHS walk-in centre does not form part of the proposals.

Western Riverside – North Bank (King 10-15)

- 2.35 The final component of Bath Western Riverside relates to the strip of land that lies between the River Avon and Upper Bristol Road (excluding the existing Council waste depot, which falls within the area covered by Crests application area (06/01733/EOUT).
- 2.36 To the extreme west is the vacant Windsor Bridge Road site and Victoria Park Business Centre (King.15). This is controlled by 'UK & European'. They are currently investigating a student accommodation scheme on this site, which is at odds with the conventional residential-led policy allocation for the site. Therefore, although the site is 'active' it does not form part of 5 year housing land supply at present as the future of the site may be contested. The HELAA estimated capacity for housing is 120 dwellings.
- 2.37 There is also land allocated for residential-led redevelopment to the east that is currently in light industrial and sui generis use:
- 2.38 In total this riverside strip could yield about 300 dwellings (most likely apartments)- assuming that King.15 is ultimately developed for non-student housing, which is allocated purpose.
- Rear of Argos (King 13) where a planning application ([13/04217/OUT](#)) pending consideration for 14 dwellings
 - Comfortable Place (King 12)
 - Omega Centre (King 11)
 - Hinton Garage (King 10) where a pre-application enquiry and accompanying draft PPA agreement was submitted in January 2015 for 74 assisted living apartments.

Former MoD sites at Ensleigh (Lan 5 and 5a), Foxhill (Cdn 1) and Warminster Road (Bwk 1)

2.39 In March 2013 the Defence Infrastructure Organisation (DIO) disposed of its three sites in Bath on an unconditional basis. All three sites now have planning permission as of April 2015, (Foxhill and Warminster Road in outline, Ensleigh in Full)

Foxhill

2.40 The capacity of the Foxhill site (branded as Mulberry Park) is about 700 and has been purchased by Curo, the District's biggest social landlord. Curo has set up a website for the development and can be accessed at www.mulberrypark.co.uk. Demolition works were approved May 2013 and have been completed. Curo submitted an outline planning application for up to 700 dwellings in October 2014 ([14/04354/EOUT](#)) and in February Development Control Committee delegated the Director of Development to permit the application subject to the completion of a S106 agreement. This was signed and the decision notice issued in April 2015. In mid May 2015 there will be a public relations event to publicise the details of the first reserved matters planning application. The application will be submitted in June 2015 enabling a decision to be issued in September 2015.

2.41 Alongside the redevelopment of the former MoD site Curo have signalled that they intend to redevelop the existing and neighbouring Foxhill estate to the west. However, a net increase in dwellings is not anticipated as part of the redevelopment of this area estate, although the stock will be substantially improved.

2.42 The construction programme for the development is anticipated to span about ten years and during the outline application phase was scheduled to commence in October 2015 and this remains achievable. The following indicative implementation plan was presented in the outline planning application pack that was been presented by Curo. The first handovers of phase 1 are timetabled for Summer 2016.

Phase	Calendar Years	Mkt	Aff	Total
Phase 1	2016-18	194	83	277
Phase 2	2018-20	93	59	152
Phase 3	2020-22	70	42	112
Phase 4	2022-24	School & Foxhill Regeneration		
Phase 5	2024-26	132	26	158
All	2016-26	489	210	699

2.43 On this basis, for the current 5 year land supply period (2015/16-2019/20) the housing trajectory assumes that all of phase 1 and half of phase 2 will be delivered. That is 352 dwellings in total. In December 2014 Curo indicated that all phase 2 could be delivered but for the time being a more conservative view is taken re 5 year housing land supply.

Ensleigh

2.44 The capacity of the former MoD Ensleigh land was originally estimated by the Council to be about 350, but planning permissions granted total 290 dwellings.

2.45 A small part of the Ensleigh site [E block] lies the south of Granville Road. This was originally purchased by Skanska and a planning application for 39 houses and apartments was permitted in December 2013 ([13/00734/FUL](#)). Skanska sold this site to Kersfield Developments in October 2014. The site has now been cleared and as of April 2015 the layout of the development was being marked out.

2.46 The core part of the Ensleigh site is in the control of IM Properties. Bloor Homes and Linden Homes Western have signed a development agreement with IM Properties to develop the site on a 50/50 basis. About 1/3 of the core part of Ensleigh is subject to a leaseback agreement with the DIO until 2018 (although the DIO could vacate earlier) but the remaining 2/3 is available now and can be delivered in advance of leased back area becoming available.

2.47 A pre-application process began in August 2013 and concluded in March 2014. During this time a demolition notification was received in respect of all buildings and structures on the site. A full application was submitted in April 2014 for 253 units ([14/01853/EFUL](#)) and was reported to Development Control Committee in November 2014. The Committee resolved to permit the application subject to the completion of a S106 Agreement. This was signed and the decision notice issued in April 2015. The HELAA anticipates that the developers will be

on-site from July 2015 (Bloor) and September 2015 (Linden) and that first completions will occur during the 2016/17 monitoring year. Bloor has already erected a marketing advertisement on the boundary of the site and has applied to discharge pre-commencement condition 6 (materials). Linden has also received permission to erect a marketing board.

Ensleigh Extension – Royal High Playing Field

- 2.48 The Royal High Playing Field immediately adjoining the Ensleigh site is identified in the Core Strategy as a future housing site. The additional land is not in the Green Belt or Cotswolds AONB. Development here would increase the overall capacity of the Ensleigh area by about 100, thus enabling nearly 400 dwellings. IM properties have purchased the site from school which will vacate by July 2015 at the latest. Critically, this land is needed in order for IM properties to fully implement 14/01853/EFUL. This is because about 25% of the Royal High land will provide the site for a new single form entry primary school that will need to be completed before the final phase of 14/01853/EFUL can be occupied. The specific land for the school has been transferred to the Council within the S106. BANES Council will then deliver the new school with its own monies, S106 contributions from 14/01853/EFUL, Hope House (13/04235/FUL) and future CIL from the 100 units on the Royal High Land. The target date for the school to be open is September 2017. The housing capacity of this area is likely to be implemented before the leased back area within the former MoD site itself.
- 2.49 In February 2015 Nash Partnership on behalf of Linden and Bloor Homes undertook a [public consultation event](#) in respect of the Royal High Playing Filed land. This area has been given the name ‘The Chill’. Various detailed iterations of the proposed layout and housing mix have been presented to the Council as part of a pre-application process and the submission of a full application is imminent.
- 2.50 The March 2014 housing trajectory did not include the Royal High School in the 5 year land supply as the land had been marketed for sale at this time. But now, due to the preceding discussion it is now assessed as being deliverable.

Warminster Road

- 2.51 In May 2014 Square Bay submitted a full planning application for 189 dwellings (subsequently increased to 206 dwellings ([14/02272/EFUL](#)) at Warminster Road. This was permitted (subject to S106) at February 2015 Development Control Committee. The S106

was signed and the decision notice issued on April 2015. Square Bay will market the majority of the site for sale but may retain a minor interest and fund the construction of this themselves. Marketing is expected to take at least 4 and at most 6 months. Having regard to the delivery of 'Ensleigh', Square Bay expects that two major PLC housing house builders may jointly bid for the site, although that is of course uncertain. At this time it is not known whether there will be one or two developers. The HELAA trajectory takes the conservative view that there will be one developer, but there is equal chance that it could be two.

Bath - City Centre sites

- 2.52 The HELAA assumes that the development sites to be allocated in the city centre in the Placemaking Plan will be largely economic development led but will include housing as part of the land use mix.
- 2.53 It is therefore assumed that, as a minimum, **North Quays, South Quays and Manvers Street Car Park/Police Station/Post Office Depot** will be redeveloped for a mix of town centre uses and will contribute 200-300 apartments between them. The precise mix of uses will be refined in the Placemaking Plan and/or via the determination of planning applications. The Council owns the car parking sites at North Quays and Manvers Street and the Police and Royal Mail have signalled the medium to long term availability of their buildings. None of the sites currently form part of the 5 year land supply.
- 2.54 Flood Risk is a key suitability and achievability issue for these sites. To enable these areas to be developed the Bath Quays Waterside Project (Flood Management Project) has been devised. This proposes a range of works to provide additional flood conveyance to offset development at North Quays and South Quays and to bolster flood defences along the south bank to prevent flooding of the Lower Bristol Road. The raising of ground levels on the sites will also be required. The Environment Agency is satisfied in principle with the solution proposed and the technical adequacy of the hydraulic modelling undertaken. The project will be delivered via the RIF and this is discussed in the detail in the April 10th 2013 Report to Cabinet (Item 188). A planning application for the works (14/04195/ERE03) was submitted in September 2014 and permitted in February 2015. Initial Implementation works (tree removal) begun almost immediately thereafter.

Bath - Other very large out of centre sites

The Former Bath Press (Wes 2)

- 2.55 The Bath Press site measures 2.2ha. A planning application for a large supermarket and associated office/creative workspace ([12/01999EFUL](#)) was refused planning permission in January 2013 and this decision was upheld in December 2013 after the appeal was recovered by the SoS.
- 2.56 Spenhill (a subsidiary of Tesco PLC) is now pursuing a residential-led scheme. Pre-application advice was sought in July 2014 (14/00009/PADEV), which proposed 300 dwellings and an EIA scoping opinion request was submitted in December 2014 ([14/05607/SCOPE](#)). This proposed 267 dwellings and 1,400 sqm of employment space. A further pre-application meeting in February 2015 signalled that the application would be in 'full' in nature, would be submitted very soon and would propose 263 dwellings and employment space. Subsequently, a full planning application was submitted on 11th May 2015 (15/02162/FUL) for "*Demolition of existing buildings and redevelopment of the site to provide a residential-led mixed-use development comprising 244 dwellings (Use Class C3) and 1,485.2 square metres (GIA) flexible employment space (Use Class B1), basement car park, associated landscaping and access.*"
- 2.57 This figure (244) is adopted as the HELAA estimate of capacity although the development management process will determine whether this is acceptable. The housing trajectory assumes this site is wholly deliverable by 2019/20, assuming that Spenhill construct the units and allowing for demolition and the construction of a basement car park. The assumption is that planning permission will be granted by September/October 2015, demolition will follow to March 2016 and implementation will begin thereafter, allowing 4 years for delivery.

Roseberry Place & Former Unigate Dairy (Wes 4&5)

- 2.58 This former light industrial area is now vacant and the site has been assembled by Deeley Freed. A pre-application process (14/00010/PADEV) concluded its initial phase in October 2014 and a follow up phase ran until 2015. An outline planning application was submitted on 28th April 2015 ([15/01932/EOUT](#)) for *Mixed-use regeneration comprising the erection of six buildings to accommodate up to 200 flats, flexible business employment floorspace (Use Class B1) (up to 6,000 sq m gross), local needs shopping (up to 1,350 sqm gross) together with all associated development including demolition of existing buildings, site remediation, construction of new*

access roads and riverside walkway/cycle path, landscaping and tree planting. but this There is a Planning Performance Agreement for this application which includes a target date for a decision and S106 of August 18th Deeley Freed have highlighted the potential for this development to wholly contribute to 5 year housing land supply BANES Council is also involved in the project as a landowner.

- 2.59 The Council would like to point out that Deeley Freed who are using Savills to market and sell their site (who themselves are also acting for Edward Ware Homes in a number of planning appeals in BANES) instructed Savills not to push the site out of the five year land supply period for Edward Wares Home critique of the BANES housing trajectory. This request was not adhered to. Edward Ware Homes critique of this site should be seen in that light.

Twerton Park - Bath City FC (Twt 1)

- 2.60 The identification of Twerton Park for housing reflects the view of the Football Club that their continued long term occupation of this facility is not economically viable. Either the club will move to another site or if a suitable site cannot be found it will fold. Either way the site will become available during the Plan period. It is not included the 5 year land supply.

Bath - Second tier large sites of about 50-100 Dwellings

- 2.61 In terms of completed sites the housing trajectory shows that there have been 56 completion on 1 one of 56 units. These relate to the redevelopment and intensification of the Day Crescent area of Twerton by Curo at the beginning of the plan period. In terms of future supply the following sites are assessed as being deliverable:

Former Lambridge Harvester Restaurant (Lan 4)

- 2.62 Crosby Lend Lease was granted planning permission for the redevelopment of this site for **46 dwellings** ([10/04977/FUL](#)) in July 2014. Subsequently, in January 2015 an alternative application ([15/00292/FUL](#)) was received from McCarthy and Stone for **50 Assisted Living (Extra Care) dwellings**. This is currently being determined and there is a target decision date of May 2015.

Former Royal High Girls School at Hope House (Lans 2)

- 2.63 Square Bay was granted planning permission at appeal for **58 dwellings** in ([13/04235/FUL](#)) in February 2015. The appeal focused on 4 dwellings on the southern part of the site. A fall-back application for 54 dwellings was permitted in January 2015 but will not now be implemented. The site is now for sale in two lots of 54 and 4 ([Savills is the agent](#)). Assuming 4-6 months for the sale of the site and about the same for demolition would mean be that substantive works could begin from the beginning of 2015/16.

Land to the rear of 89-123 Englishcombe Lane (Odn 3)

- 2.64 This is a Council owned site which adjoins two parcels of land in the control of Redcliffe Homes (under option). The land has been allocated for the development of **40 dwellings** since the adoption of the BANES Local Plan (2007). It has not come forward for two reasons. Firstly, the Council was not minded to sell the land during the recession due to its impact on land values. Secondly, a suitable access could not be achieved without a strip of land within the front curtilage of no.89 Englishcombe Lane. There was a ransom strip. The Council itself was not minded to buy the land from the landowner for the price being asked to enable an accessible development. However, now Redcliffe Homes has agreed a price for the ransom strip and also controls land to the south of the allocation. It has approached the Council to buy its land (the allocation) and intends to develop this and the additional land it

controls to the south for around 70 dwellings. As of April 2015 Redcliffe has agreed terms with the Council and is in the process instructed solicitors to act for it in the acquisition. A planning application will be made by the end of 2015. The SHLAA assumes 40 dwellings on the allocated site is deliverable, as the case has yet to be made for the additional 30.

- 2.65 There are sites of this scale that are developable as opposed to being deliverable. These include:

Hartwell's Garage, Newbridge (New 1)

- 2.66 This site is currently in active use. A pre-application enquiry was made April 2013 (13/00004/PADEV) for the provision of 150 dwellings. The HELAA assessment is a more conservative 80 dwellings based upon the conclusions of a Certificate of Appropriate Alternative Development (10/03384/CAAD) for a proposed use that was issued in 2010. An enabling application for a replacement garage facility at Peasedown St. John (13/03440/FUL) was permitted in December 2013. An outline planning application (14/03977/OUT) for the erection of three blocks of student accommodation comprising 194 student bedrooms in studio/cluster flats and 70 bedrooms in a terrace of 14 two storey HMOs with access from Newbridge Road was submitted in September 2014 but withdrawn in November 2014. Student accommodation would not count towards the housing requirement. Since the application was withdrawn the landowner has responded to the Options version of the Placemaking Plan which seeks to allocate for non-student residential development. The representation promotes older persons housing as part of the land use mix.

Land Disposal at the Royal United Hospital (New 2)

- 2.67 At the time of the adoption of the Core Strategy there was evidence that there would be land disposal at both the northern and southern ends of the campus. That has now reduced (within the latest version of the estate plan) to the northern end where there is scope for around 50 dwellings (likely apartments).

Bath - Third tier large sites of less than 50 dwellings

2.68 There have been 250 units completed sites of 10-40 units since the beginning of the plan period, with most sites being in the teens in terms of scale. The following sites of this scale are judged as being deliverable during the next 5 years.

HELA A Ref	Planning Ref	Site	No.	Comments
Wal 1	07/01598/FUL	Southbourne Gardens	10	Under Construction
Wid 22	07/02461/FUL	43 Upper Oldfield Park	14	Built but retrospective application on deviation from plans refused against officer advice. Appeal win needed to enable occupation.
Lans 3	07/03640/FUL	5 - 13 Somerset Place	23	Part complete and part under construction
Wid 5	12/01058/FUL	Newark House	14	Under Construction
Odn 1a	14/05828/OUT	90 Frome Road	14	Permitted April 2015

Land in the Green Belt adjoining Bath

- 2.71 Strategic areas of land availability in the Green Belt surrounding Bath are focused on further land at Odd Down (Hignett Family Trust) and West of Twerton (Duchy of Cornwall). There is also evidence of significant land availability from landowners on the lower southern facing slopes at Weston.

Odd Down /Sulis Manor (East)

- 2.72 See paragraph 2.64. The eastern area is not suitable for development based on the assessment within paragraphs 139-165 of the Core Strategy Inspectors Report.

Lower slopes north of Weston

- 2.73 The HELAA relies on [paragraphs 139-165 of the Core Strategy Inspector's Report](#) for the objective assessment of suitability. The main matters here are the effect on the Green Belt, AONB, WHS and Bath Conservation Area. The outcome is that this area, wholly or in part, is not suitable for development

West of Twerton

- 2.74 During the preparation of the Core Strategy, an urban extension of 1,500-2,000 homes was promoted [West of Twerton](#) by the Duchy of Cornwall. More recently, as part of a call for sites consultation in respect of the West of England Joint Strategic Plan, the range has been downgraded to 1,000-1,500. To achieve this, the development area has been pulled back from its former northern boundary. Both approaches would cause substantial harm to OUV of the World Heritage Site. Development here would also significantly harm the setting of the AONB, not least in views from Kelston Historic Park and Garden. The site is dissociated from the urban fringe and connectivity across the Newton Brook valley cannot be achieved. The lower level of development would reduce the environmental impact but not to the extent that the residual area is suitable. A BANES Concept Options Report for the site (Arup , 2013) considers a much contracted development concept (300 dwellings) but still found this to be at Odds with heritage considerations and that such a concept would not a critical mass in respect of providing local services and extending bus routes. The HELAA concludes that this area is not suitable for development.

Other Green Belt land around Bath

- 2.75 The HELAA also assesses the credentials of other large potential development cells around Bath but finds no evidence of large scale availability or any large suitable areas of land. The Council has not assessed the suitability credentials of National Trust Land at Claverton Down as it is not available. Neither has it assessed the credentials of land south of Old Fosse Road, to the SW of the city on account of the steepness of the slopes and the presence of three ancient woodlands, in addition to WHS impacts issues.
- 2.76 Other medium sized and small parcels of land have been promoted around Bath. Land behind Minster Way is regarded as being unsuitable in respect of WHS Setting impacts. There is a small field atop the Odd Down plateau at Old Fosse Road (ref E.16) that has some potential for c.30 dwellings and there is also a site accessed off the Midford Road (ref E.14bi) that has the potential for about the same.

Land within and adjoining Keynsham

- 2.77 The HELAA concludes that land at Keynsham (including that removed from the Green Belt for immediate development) can deliver 2,076 dwellings between 2011/12 and 2028/29. This comprises:

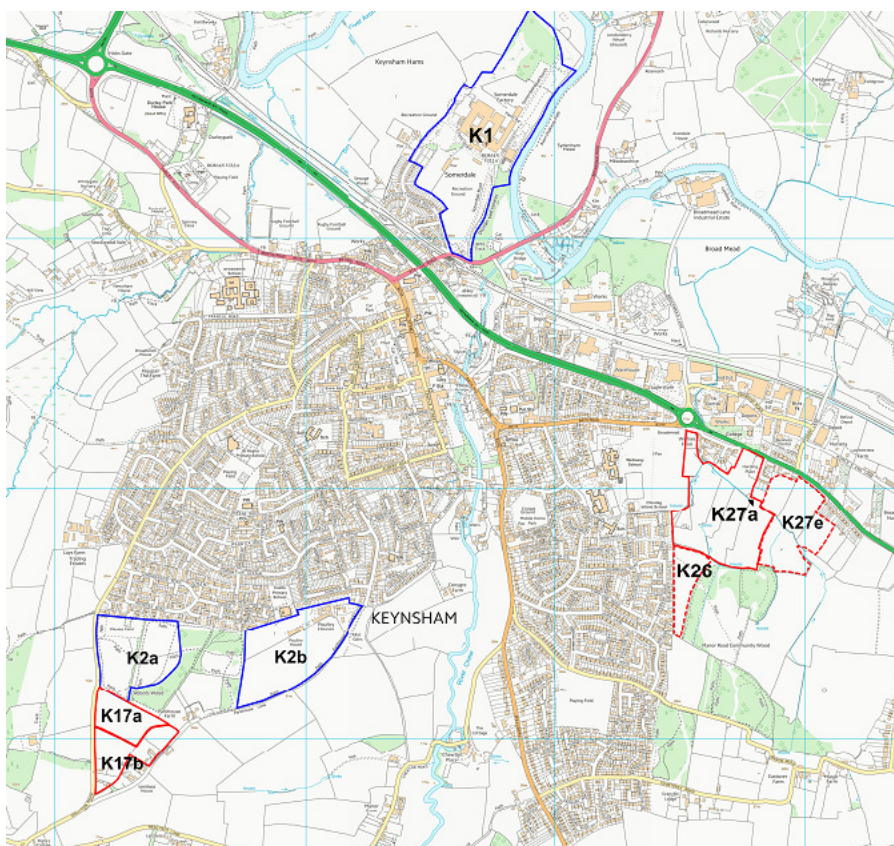
Source	Dwellings
Large and small sites built 2011/12 -2014/15	202
Large sites with planning permission	1,196
Small sites with planning permission	37
Small windfall sites	63
Large developable brownfield sites	125
Land removed from the Green Belt in the Core Strategy	450
Total	2,076

- 2.78 The growth of Keynsham relates primarily to the redevelopment of the following sites, which will produce 84% of total identified supply.

Ref	Site	Dwellings
K1	Somerdale	742
K2	Land removed from the Green Belt to the <u>south</u> of Keynsham within the <u>BANES Local Plan</u>	551
K17 a&b	Land removed from the Green Belt to the <u>south</u> of Keynsham within the <u>BANES Core Strategy</u>	200
K27a	Land removed from the Green Belt to the <u>east</u> of Keynsham within the <u>BANES Core Strategy</u>	250
Total		1,743

- 2.79 In addition Land safeguarded from the Green Belt to the east of Keynsham within the BANES Core Strategy (200). This would increase to overall housing potential to around 2,326 if it was developed after being released in plan review.

Location of Key Development Sites at Keynsham



Somerdale (K1)

- 2.80 The largest development site in Keynsham is the former Somerdale Factory. Taylor Wimpey's hybrid planning application for 682 dwellings ([13/01780/EOUT](#)) was permitted in September 2013. 267 units were permitted in full, and 415 in outline. Construction commenced in April 2014 with 26 completions recorded for 2014/15. The planning application file contains a [build sequence plan](#) showing an 8 year implementation programme. Activity during 2014/15 suggests that this remains valid a plan.
- 2.81 In August 2014 it was announced that Taylor Wimpey had sold part of the site (the three iconic large red brick former factory buildings) to MF Freeman who subsequently, in December 2014, submitted a revisions to the original Taylor Wimpey permission under ([14/05811/EFUL](#)). The MF Freeman revisions were permitted on April 2nd 2015 and have the effect of increasing the overall number of residential units to 742 dwelling units.
- 2.82 Land identified within the original Taylor Wimpey scheme for a development of 60 nursing bedrooms is instead used for 30 dwellings. Factory Block 'A' remains as already permitted

(113 flats). Whereas Blocks B and C were to be partly demolished and partly converted to 10,000 sqm of office space the MF Freeman scheme concentrates office development in Block C (11,000sqm) and converts Block B to 105 nursing bedrooms and 30 extra care dwellings. The MF Freeman scheme therefore provides an additional 60 dwellings. The 102 nursing homes bedspaces will not be counted towards housing land supply.

South West Keynsham (K2 a and b)

- 2.83 The 'GDS.1/K2' allocation of the BANES Local Plan (2007) is formed of two sections, east and west. The western section is being developed by Taylor Wimpey for 285 dwellings ([09/04351/FUL](#)) and first completions were recorded during 2013/14 (36 dwellings) with 62 following in 2014/15.
- 2.84 The eastern section of this allocation is being developed by Barratt whose planning application was permitted in January 2015 for 267 dwellings ([14/00049/FUL](#)). Barratt market the development as 'Bilbie Green' on its website and state that show homes are due to open in 2015. The housing trajectory reflects Barratt's [phasing plan](#) (of 27th Oct 2014).

Urban Intensification

- 2.85 Limited potential has been identified for the urban intensification of Keynsham in respect of large sites, although the Council's former Riverside office complex and the adjoining fire station site has clear potential. The Council owns the freehold to Riverside and vacated the premises in Autumn 2014 to take up a new purpose built facility immediately to the north. Prior to this, in October 2013, a pre-application enquiry covering both of these sites was made for 70-120 apartments and 2,000 sqm of office space (13/00020/PADEV).
- 2.86 Since that time the leasehold of Riverside has transferred from Topland (who went in administration) to Addington Capital. Addington has yet to clearly state their intentions for the site and whether this involves refurbishment or redevelopment (the later may not be viable). The site lends itself to residential conversion (perhaps for older persons housing or office use, if there is market for that in addition to the new space coming forward at Somerdale). Whilst it is unlikely that the new leaseholder will leave the building vacant for the next five years, one cannot say what the use or use mix will be. There is a reasonable probability that some residential development will come forward in the next 5 years but the housing trajectory take a cautious approach and does not regard the site as being deliverable

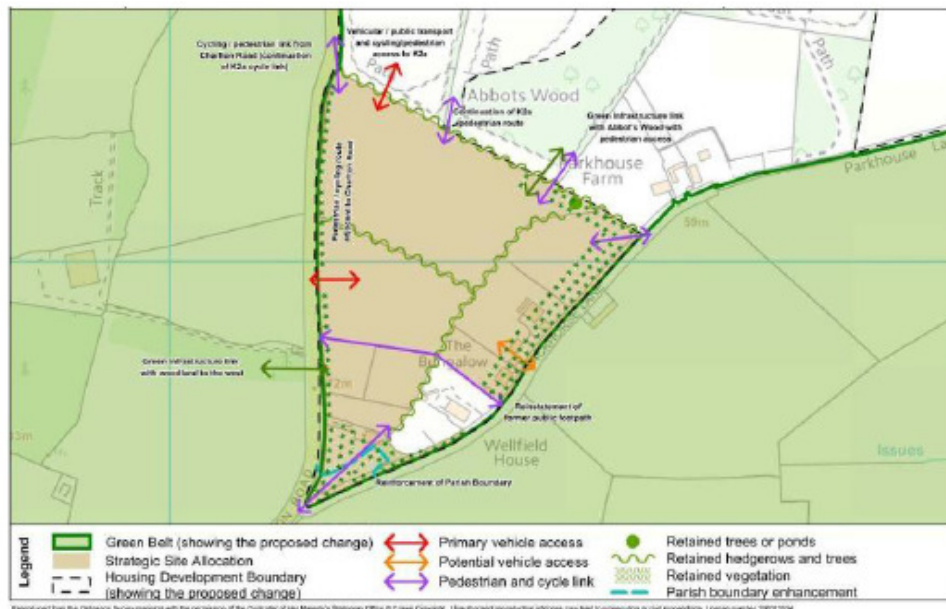
for housing yet. If the picture changes during 2015 then housing trajectory can be updated to reflect this.

- 2.87 In August 2014 Avon and Somerset Fire Service was granted planning permission for a ‘new super-station’ to the west of Keynsham on the Hicks Gate roundabout (14/01849/FUL). That will result in the current site (between the Councils new office and Riverside) being vacated and disposed of.

Land removed from the Green Belt at Keynsham

- 2.88 The Core Strategy removes land from the Green Belt in two locations.

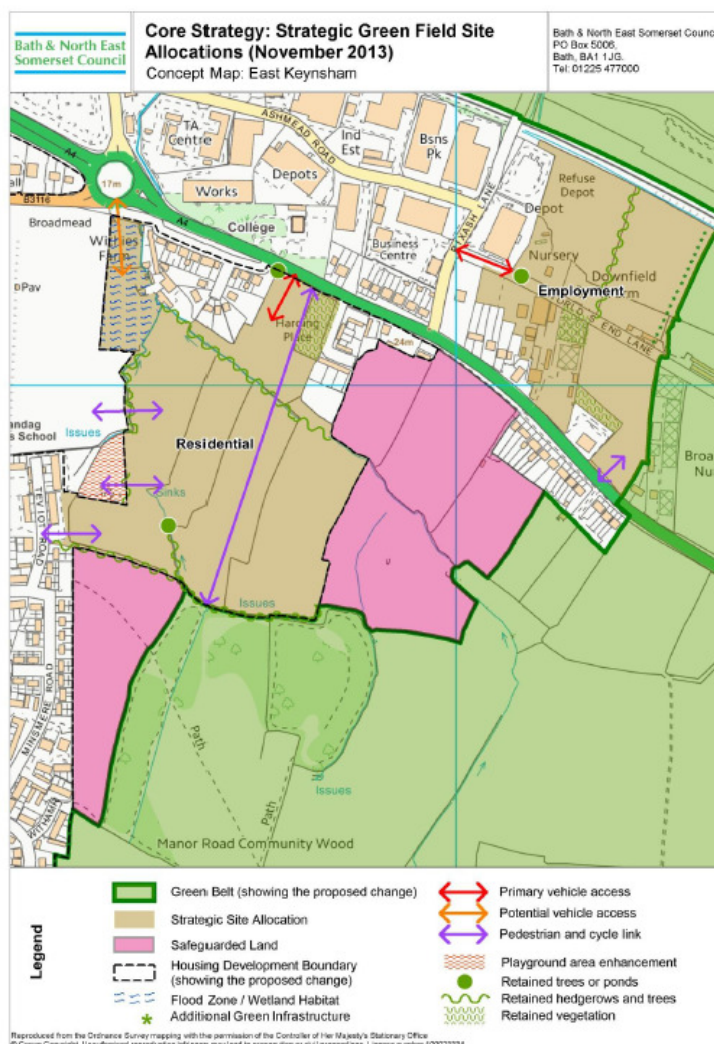
South Keynsham



- 2.89 To the south of the eastern section of ‘K2’, Core Strategy Policy KE4 removes land from the Green Belt to accommodate around 200 dwellings. Paragraphs 209-217 of the Inspector’s Report set out why this area is suitable for development. At the time of the adoption of the Core Strategy it was thought that the land was wholly in the control of Bloor Homes, but it has since been revealed that the land is split with Permission. This is good from a delivery rate perspective as it means that two developers (targeting different market segments are likely to be on site at the same time.

2.90 In March 2015 a joint masterplan for the development of the allocation was submitted from Turley Associates/Barton Wilmore on behalf of both homebuilders. At the same time an EIA screening option (15/01180/SCREEN) was received to which the Council responded in the negative. The masterplan will form the basis for separate (full) planning applications to be submitted in Summer/Autumn 2015, which can be determined before the end of 2015/16. That would leave 4 years for implementation, meaning that the site is wholly deliverable in the next 5 years.

East Keynsham



2.91 To the 'East of Keynsham', beyond the grounds of Wellsway School, Mactaggert and Mickel (M&M) are preparing an outline planning application for up to 250 dwellings. It is understood that M&M have a promotional agreement with the landowner and that the outline planning application will be sold on to one or more other house builders. Although M&M

are house builders (in Scotland), in England they currently act as land traders. To the south (Taylor Wimpey) and to the east (M&M) two additional areas are safeguarded for future development and these could yield around another 250 dwellings. Paragraphs 194-208 of the Core Strategy Inspector's Report set out why this area as a whole is suitable.

- 2.92 Requests from M&M for EIA screening opinions were submitted in November 2014 (14/05417/SCREEN & 14/05418/SCREEN) for "proposed residential and associated development for circa 250 and 500 dwellings, including provision of a primary school, on approximately 20.9 hectares of land at East Keynsham". This relates solely to the land in M&M's control, not the Taylor Wimpey land.
- 2.93 The development management process is likely to involve a Planning Performance Agreement (PPA) setting out key milestones/dates with a masterplan taken to Development Team and subsequently Development Control committee for agreement. This will be followed by a planning application. As of early March 2015 the Council had responded to the applicant's transport consultants (Key Transport consultants) on the scope of a Paramics Traffic Modelling Scoping Note. That will enable KTC to prepare a brief and progress this aspect the planning application. Highways impacts were the key issue affecting the allocation of this land for development.
- 2.94 It is understood that M&M will be in a position to submit an outline application towards the end of Summer 2015 (say September). A number of studies have been completed or are in the process of being completed in order to prepare a pre-application masterplan. In April 2015 the LPA received a request from M&M for an inter disciplinary workshop (late May early June) to aid the preparation of the master plan and outline application.
- 2.95 On this basis, it is estimated that an outline planning applications process (including determination) will take no longer than April 2016 to complete. It will then take 4-6 months to sell the site (which could go to one homebuilder or a consortium as per the South Keynsham site (see above). Reserved matters application(s) could be submitted in the first part of 2017 and be determined by mid-2017. First completions can reasonably be assumed to take place until in the 2018/19 monitoring year (perhaps a few months earlier) and it depends on whether there are one or developers as to whether that year would see 50 or 100 completions. The housing trajectory assumes one developer for now. This timetable is slower than indicated by paragraphs 3.7 and 3.8 of a [Statement of Common Ground \(ref BNES53/H\)](#) prepared between the Council and the developer in February 2014 to inform the

Core Strategy hearings. The primarily relates to the new understanding that M&M are acting as land traders. Had they intended to build the homes themselves, then the timeframes for development could have been quicker (as per the south Keynsham site).

Land in the Green Belt adjoining Keynsham

2.96 In addition to the land now removed from the Green Belt, landowners and developers have promoted other areas to the east, west and south of Keynsham. Much of the land in the area is suitable for development, although there are some absolute constraints, notably HSE exclusion zones around gas pipeline infrastructure in the Keynsham Salford gap (and to a lesser extent on the western side of Keynsham above Stockwood Vale), the Chew Valley which divides Keynsham into distinct its eastern western parts, ‘The Hams’ within the bend of the River Avon (flood risk), and Stockwood Vale itself. Where land is suitable, some areas are relatively stronger in respect of their sustainability credentials than others.

East of Keynsham

Westward extension to Salford

2.97 The most sustainable areas to the east of the existing built up area have been removed from the Green Belt for development now or have been safeguard for development in the future. There is no additional potential further to the east, and to the south of the A4 due to the presence of a national high pressure gas main, its exclusion zone, and Manor Road community woodland. Development on the eastern side of the gas main would be effectively be an extension to Salford and is considered separately. Beyond the current allocations, further housing development would currently have a severe impact on the highway network. This means that the safeguarded land and any other land is not developable without measures to address this constraint. It may be possible for greater levels of additional development to bring with it the investment needed to make it acceptable in highways terms.

Between the A4 and the railway

2.98 Between the A4 and the railway line an area of 4 ha has been removed from the Green Belt and has been allocated for economic development purposes. In time, and reflecting NPPF:22, should the anticipated demand for this land and not emerge (wholly or in part) to the extent that there is no reasonable prospect that this area would be used for the allocated use, its allocation could be review and yield about **100+ dwellings**.

Avon Valley Farm

- 2.99 In the words of the Inspectors Report (paragraph 221) “complex and ambitious proposals for houses and employment were promoted on land north of the railway line at Avon Valley Country Park and Business Park. Such proposals would cause significant visual harm in an open landscape; significantly undermine Green Belt purposes of preventing sprawl and the merger of towns; and require complex new road infrastructure, creating uncertainty about delivery”. These matters act against its suitability but not to the extent that the land should be regarded as unsuitable when considering longer term needs. During the preparation of the Core Strategy the landowner promoted a marina and **300 dwellings** in this location. The same landowner controls more land in this area that is developable (before the fundamental constraint of the gas pipe exclusion zone is reached) but it is not available. The northern periphery of this general location constrained due to flood risk from the River Avon and is not suitable for development.

Manor Road (north of)

- 2.100 The final area of Green Belt to the east of Keynsham is a relatively small parcel to the north of Manor Road and south of the safeguard Taylor Wimpey land. This could yield about **100 dwellings**. It does not enjoy the accessibility benefits of the safeguarded or allocated land to the north, but it is nonetheless suitable (although it is still subject to the aforementioned strategic highways issues).

South of the eastern finger of Keynsham

Uplands

- 2.101 To the extreme south of the eastern segment of Keynsham, [Uplands](#) is also partly affected by the alignment of the gas main. This is a peripheral, elevated location, in an open landscape setting. However, the land not affected by the gas main exclusion zone is suitable, at least in part, available and could yield up to **500 dwellings**, although this figure needs refining as the suitable area is refined.

South of the western finger of Keynsham

Parkhouse Lane and Redlynch Lane

- 2.102 To the extreme south of the western part of Keynsham (south of for KE4), during the preparation of the Core Strategy, Bloor Homes promoted (in addition to KE4) an urban extension of about 750 dwellings largely between Parkhouse Lane and Redlynch Lane. More recently as part of the WoE JPS call for sites exercise a smaller area has been promoted,

whereby Bloor has pulled the developable area away from the former eastern boundary, perhaps in response to the Core Strategy inspectors report on landscape impact (see below).

- 2.103 This is a peripheral location away from the main transport corridor for rail and bus services. There is also the potential for significant wider landscape impact (Keynsham South Landscape and Visual Impact Assessment CD9/LV8). This land is seen in extensive views across the Chew Valley from the East. The Core Strategy Inspector (paragraph 219) did not find the promoters favourable landscape assessment convincing (CD13/6). The impact of development cannot be mitigated as can be achieved in respect of the allocated area.
- 2.104 In combination, this areas weak sustainability credentials and the significance of the landscape and visual impact render this area unsuitable or at best on the absolute margin of suitability. As part of the evidence base to the Core Strategy a Concept Options Report for [South Keynsham](#) presented two options for the development of the area to the south of Parkhouse Lane area of at 460 dwellings (Areas D1-D4 of Option 1) and 300 (Areas C1-C4 of Option 2). A [Development Framework](#) prepared by JS Bloor showed a plan for 734 homes (excluding the now allocated Cells H1 and H2), although the developable has since been pulled back, reflecting more closely the smaller area that Arup were looking at. The Council considers that the harm caused by such development, in an isolated location, would significantly and demonstrably outweigh the benefits.
- 2.105 Parkhouse Lane (and Charlton Road to the west) creates new logical long Green Belt boundaries is this location that can endure for the long term. Given its rural character and wider visibility, the land south of Parkhouse Lane fulfils the Green Belt purpose of preventing encroachment into the countryside. Its contribution to other purposes is limited and it is a less sensitive location in Green Belt terms than other edges of Keynsham.

West of Keynsham

Plateau north and south of Lays Farm

- 2.106 To the [West of Keynsham](#) lies a potentially developable area sitting above Stockwood Vale. The land to the south of the Lays Farm Industrial Estate is an area that has been brought to the Council's attention (by Redrow Homes). This is on an open plateau in a sensitive part of the Green Belt between Keynsham and Stockwood. Whilst in the long term new woodland planting might preclude intervisibility between these two urban areas ([CD13/22](#)), the Core

Strategy Inspector did not regard such planting as mitigating significant harm to the Green Belt here, since the Green Belt primarily seeks to retain openness.

- 2.107 Nevertheless, from a landscape and visual impact perspective the land is suitable and the impact can be mitigated. The land is constrained in part by the alignment of a gas pipeline on its western periphery. There remains a developable area that could yield about **150 dwellings**.
- 2.108 The central / northern part of plateau to the west of Keynsham has been promoted via the West of England Joint Planning Strategy HELAA call for sites exercise. The central area could be accessed from the Lays Farm industrial estate access off Charlton Road. The further north one goes the more difficult it become to create a further access without securing 3rd party properties on Lays Drive. It might be possible for third party land to be acquired but there is a clear achievability issue here and the impact on Lays Drive itself would need to be assessed. Gaining access to the extreme northern part of site seems impracticable given the presence of narrow cul-de-sacs off Lockingwell Road. Equally the final stretch of St Francis Road does not seem capable of being widened to achieve access.

- 2.110 The largest part of the area (around Staunton Manor Farm) is owned by Horseworld and this land was marketed for sale at the end of 2014. Bellway Homes has been confirmed as the preferred bidder for the majority of this land (area 1) whilst Whitecroft Developments has secured the small listed buildings component of this area (*area 2*)
- 2.111 Prior to the adoption of the Core Strategy Horseworld sought planning permission for 124 dwellings for the area that they are now disposing of ([13/02164/OUT](#)). The listed buildings were to be converted to yield 6 dwellings (on 0.4ha) whilst the main of the site was to yield 118 at 39 dph (on 3.0ha). This was refused in December 2013 for Green Belt reasons. The design of the scheme was acceptable in-principle and the indicative layout enabled vehicular connections with other land in the strategic allocation to land the east and south. It is likely that this area will yield around the same amount of housing once master planned in conjunction with the most of the rest of the residual part of the site that Barratt control (partly by freehold, partly by option agreement). Indeed a pre-application submission from Bellway, submitted on April 7th 2015 ([15/01566/PREAPP](#)), contains a detailed planning layout capable of accommodating 120 dwellings.
- 2.112 The Barratt interest comprises one field and two paddocks of 2.7ha. If developed at around 35-40dph this area would yield around 100 dwellings. It could be developed in parallel with the Bellway site if an access was arranged from Queen Charlton lane. There is no highways objection to this.
- 2.113 Savills are representing all three parties and are drawing up a masterplan on their behalf. All parties are keen to progress this and submit planning applications as soon as possible. Significant planning progress could be made on this site during 2015 enabling implementation to begin from 2016. We understand that Bellway are contracted obliged to submit a planning application in July 2015.
- 2.114 The final component of the Policy B5 allocation is a haulage yard off Staunton Lane. This site is being wound down and that replacement site has been found elsewhere in Bristol. It should be vacant by 2017. Further, the Johnstone Land Company Ltd has assembled this site together with the land immediately to the east (that is outside the Green Belt but also outside the HDB) by way of option agreement. This area is 1.7 ha and could yield around 60 dwellings at 35-40dph. This capacity of this area is not yet included within 5 year housing land supply.

Land in the Green Belt at South East Bristol

- 2.115 A number land parcels were promoted as being available for development during the preparation of the Core Strategy. These are focused on Whitchurch (Taylor Wimpey, Bovis, Robert Hitchins, further Horseworld land and others) and ay Hicks Gate (mainly Crest Strategic, and Key Properties but also Stratland).
- 2.116 A further HELAA submission relates to Stockwood Vale Golf Club. This is considered to be unsuitable for reasons relating to a lack of connectivity with the edge of Bristol, landscape impact, and Green Belt harm.

Hicks Gate

- 2.117 In its adopted Core Strategy Bristol City Council does not make immediate provision for an expansion of the city into the Green Belt in this area. However, Policy BCS5 of the Bristol Core Strategy does identify land in the Green Belt at Hicks Gate as a contingency area for development. The contingency will be considered if monitoring shows that planned provision for the city will not be delivered at the levels expected, or if land is required to accommodate higher levels of provision. Paragraph 4.5.22 of the Bristol Core Strategy states that the capacity of the contingency area at Hicks Gate (within Bristol City Council's administrative area) is unlikely to exceed 800 homes if existing uses are retained.
- 2.118 This assumption, although accurate in some respects, does not square well with the spatial principles of indicative masterplan prepared by the developers in 2010, covering both land within Bristol and BANES (see overleaf). This indicative plans shows land within the Bristol administrative area to the south of the A4 in employment use, with the current allotments retained. To the north of the A4, Brislington Football and Cricket Club remains in situ and housing is limited to around 1.4ha on part of the he field immediately to the north of the A4 and to the west of *Oakleigh* that could yield around 50 dwellings. The employment area is itself is 20ha and if 100% developable for housing would yield around 700 dwelling a 35 dph. Given that this masterplan as a whole is said to be able to accommodate around 1500 dwelling it suggest that pretty much all of this is within the BANES administrative area.

Hicks Gate Indicative Developer Masterplan



- 2.119 A Development Concept Options Report for [Hicks Gate](#) (Arup 2013) for the land within BANES, confirms that this area is suitable for development. There are some topographical, hydrological and utilities related constraints but these are not absolute and would inform master planning rather than prevent development. The potential of the area (within BANES) is identified as being least 650, rising to 1,200 if a greater level of environmental impact and Green Belt intrusion is accepted.
- 2.120 In conclusion one is probably looking at 650-1200/1500 as part of a mixed use development. The top and bottom of this range could increase by upto 700 if some or all of the 20ha of employment land was instead identified for housing.
- 2.121 The impact on the Green Belt and the separation of Bristol, Keynsham and Bath along the A4 corridor is a key issue here. The impact on the highways network is also an area of concern with traffic already backing up along the A4 through Brislington.

Whitchurch

- 2.122 A BANES Development Concept Options Report for [Whitchurch](#) (Arup, 2013) confirms that the area is suitable for development. The setting of Maes Knoll (SAM) presents a significant constraint that limits the southern extent of the area that is suitable for development. The availability or otherwise of all or part of 'Horseworld' (beyond the area removed from the Green Belt) is also a major influence on capacity. Green infrastructure and historic environment assets (designated and undesignated) in respect of the immediate surroundings of Bristol and Whitchurch also present master planning consideration.
- 2.123 The report concludes that if all the area is available for development then 3,000 dwellings could be forthcoming. Significantly less than this is currently deliverable in the absence of major highways improvements. During the preparation of Core Strategy, Barton Willmore (acting for Taylor Wimpey and Bovis) suggested a first phase of 600 could come forward without such improvements.

Whitchurch Indicative Developer Masterplan (May 2013)



2.124 Also in this area Robert Hitchins appealed a decision the refuse a development of 285 dwellings between Whitchurch village and Stockwood ([12/04597/OUT](#)). The appeal was upheld by an Inspector but the SoS did not agree and dismissed it.

The Somer Valley (Midsomer Norton, Radstock, Westfield, Paulton and Peasedown St John)

2.125 The HELAA concludes the Somer Valley can deliver about 2,470 dwellings between 2011/12 and 2028/29. This comprises:

Source	Dwellings
Large and small sites built 2011/12 -2014/15	748
Large sites with planning permission	1,198
Small sites with planning permission	115
Small windfall sites	197
Large developable brownfield sites or allocations	209
Total	2,467

Land within existing HDBs

2.126 The HELAA concludes that the Somer Valley can deliver about 2,100 within the currently defined housing development boundaries and on allocated sites. This figure includes 197 units on small windfall sites. Greenfield Sites with permission total 353.

Large previously developed sites built or with planning permission

Radstock Railway Land, Radstock (Rad 1)

2.127 In June 2014 outline planning permission was granted for the redevelopment Radstock Railway Land for 190 dwellings ([13/02436/EOUT](#)). At the same time permission was also granted for the first phase of 70 units ([13/03786/EFUL](#)). Construction has commenced and Linden completed the first 14 units during 2014/15 and the remainder of this phase will complete in 2014/15. A further reserved matters application(s) will follow during 2014/15 to enable continuity of delivery.

Former Alcan Factory, Westfield (MSN 10)

- 2.128 The redevelopment of the former Alcan Factory ([11/01772/FUL](#)) is being undertaken by Linden Homes (144) and Barratt (25). First completions took place 2013/14 and the remainder followed in 2014/15, aside from five units.

Former Polestar Purnell Printing Factory, Paulton (Pau 1&2)

- 2.129 The former Polestar Purnell Printing Factory at Paulton is the largest development site in the Somer Valley. The site has been developed by Barratt and Bovis. The first development area (Barratt) delivered 161 homes, although only 41 that were built after 2011 count towards current plan period delivery.
- 2.130 The second phase (Bovis, 467 houses and 130 self-contained C3 units as part of a close care retirement community) was granted outline permission in July 2010. Since then reserved matters have been approved for the following phases. In addition to phases 2a and 2b, only some of phase 3 and none of the CCRC is part of the identified five year housing land supply

Phase	Planning Ref	Dwellings	Status
Phase 1a	11/00800/RES	38	Complete
Phase 1b	11/03783/RES	38	Complete
Phase 2a	13/03177/ERES	82	60C, 22UC
Phase 2b	13/03548/ERES	86	Partly UC
Phase 3	15/00293/FUL	220	Not Started
CCRC	Awaited	130	Not Started

Other Large brownfield sites

- 2.131 A number of other large brownfield sites supplement the supply of housing land that has been developed or has with planning permission by 161 units. These are identified the housing trajectory and include, but are not limited to:
- **Rear of 52 Midsomer Norton High Street (22), Elm Tree Avenue (27), Elm Tree Inn (10), Bryants Avenue (14), Old Bakery, Waterloo Road (14)** which are 100% affordable housing schemes that have been or will be developed by Curo and Guinness.

- **Hazel Terrace** (MSN.10i - 24 units) where a technical start has been made which will stop the permission expiring. Flower & Hayes will implement this permission once the Alcan scheme has been completed, and after first completing a couple of other sites (outside BANES).
- **St Peters Park 1** (MSN 16 – 14 units) not to be confused with a larger application to the rear of the factory that is pending consideration.
- **Old Pitt Yard**, Clandown (RAD.15), where outline permission was previously granted for 31 dwellings but where there is currently an application pending consideration for 48 dwellings 14/02889/OUT. This is likely to be considered favourably, the only remaining issue being the viable level of affordable housing that the site can deliver.

2.132 Excluded from the supply of housing sites is **Paulton House, Old Mills** where prior approval was given for the conversion of the building (via permitted development rights to residential use). The site is currently being marketed for sale, for commercial and/or residential use but it seems unlikely that a residential buyer will take the site, due to immediate location, this being retail park/industrial estate in nature, and peripheral to the town of Midsomer Norton

Greenfield sites built or with planning permission

Wellow Lane (Pea 1)

2.133 David Wilson Homes developed 95 units at the beginning of the plan period under planning ref [08/03263/FUL](#). The site was allocated in the BANES Local Plan (2007).

Cautletts Close (MSN 19)

2.134 David Wilson Homes developed 112 units at the beginning of the plan period under planning ref [10/04015/FUL](#). The site was allocated in the BANES Local Plan (2007).

Monger Lane (MSN 28)

2.135 Taylor Wimpey submitted an outline planning application for 135 dwellings in October 2012 ([12/04590/OUT](#)). This was refused in May 2013. The LPAs decision was appealed and hearings took place in October 2013, with a PINS decision allowing the appeal following in

December 2013. This was before the Core Strategy was adopted (July 2014), a time when the LPA could not demonstrate a 5 year housing land supply. In December 2014 a reserved matters application was submitted ([14/05697/RES](#)) and this was approved in April 2015. The site is wholly deliverable during the next 5 years.

Land at Fosseway South (MSN 31a)

- 2.136 Strategic Land Partnerships submitted an outline planning application ([13/00127/OUT](#)) for 165 dwellings in January 2013. The application was reported to Development Control Committee in May 2014, S106 negotiations followed and in November 2013 permission was granted. This was before the Core Strategy was adopted (July 2014), a time when the LPA could not demonstrate a 5 year housing land supply. The site was then marketed for sale and Barratt emerged as the preferred bidder. A reserved matters application was submitted in September 2014 ([14/04032/RES](#)) and permitted in January 2015. The site is wholly deliverable during the next 5 years.

Knobsbury Lane (Rad 27)

- 2.137 Ammerdown Estate submitted an outline planning application ([13/00127/OUT](#)) for 53 dwellings in April 2013. This was permitted in May 2014. At this time the Core Strategy had yet to be adopted and so the LPA could not demonstrate a 5 year housing land supply. The site was then marketed for sale and Persimmon emerged as the preferred bidder. A reserved matters application ([14/04499/RES](#)) was submitted in October 2014 and permitted in February 2015. The site is being marketed at Haywood Heights and is wholly deliverable during the next 5 years.

Greenlands (Pea 7a)

- 2.138 Edward Ware Homes submitted an outline application ([12/05477/OUT](#)), for 89 dwellings in December 2012. This was refused in August 2013. The LPAs decision was appealed and hearings took place in April 2014, with a PINS decision allowing the appeal following in June 2014. This was before the Core Strategy was adopted (July 2014), and before the arrival of the Inspectors report, a little later in June 2014, a time when the LPA could not demonstrate a 5 year housing land supply. The site is being marketed through [Savills](#). It is not known if it has yet been sold (apparently not if the agents website is up to date – although it dates a deadline for bids of September 2014). There is therefore no reserved matters application yet. Nevertheless, there is no reason why the site cannot be regarded as being wholly deliverable within the next 5 years.

Large previously developed HELAA sites without planning permission

Former Welton Bibby Baron Factory (MSN 9)

- 2.139 In 2013 **Welton Bibby and Baron** vacated their factory in Midsomer Norton to relocate to a new facility in Westbury (Wiltshire). The HELAA estimates that a housing-led redevelopment, along the lines of the approach and density taken in respect of the former Alcan factory would yield up to 150 dwellings. When the site was first vacated there was significant interest Terrace Hill in developing a large part of the site for a supermarket (with Asda the apparent occupier). However, that interest no longer exists as the market for new large supermarkets itself has contracted to almost nothing. By contrast the Council is aware that Aldi is interested in the site, having announced a large expansion programme. The land take of a discount supermarket would be a lot less than for an Asda, but it would nevertheless eat into the developable area to the extent that 100 dwellings would form a more reasonable assumption, if the site was not wholly residential.
- 2.140 Welton Bibby Baron have promoted their land for development in response to the BANES Placemaking Plan Options consultation (December 2014) and the West of England Joint Planning Strategy HELAA call for sites exercise (March 2015). A mixture retail and residential is promoted (although the residential figure of 300 that is quoted may not be achievable or would result in an apartment based scheme). In respect of retailing, the site is edge of/ out-of-centre and there is potentially an in centre/edge of centre Council owned car park site (South Road, MSN 4) that might be available for, and that could accommodate a discount supermarket. It is understood that WBB will wait until the preferred options version of the Placemaking Plan to decide their next move. If this gives the green light for retailing on site then it is likely that an outline planning application would be progressed, sponsored by Aldi and a PLC house builder.
- 2.141 The site will be redeveloped to include housing during the plan period. There is a reasonable prospect that the site will also host food retailing. To this end the central HELAA assumption is for 100 dwellings and a discount supermarket. It seems reasonable to allow for some of that development to occur within the next 5 years and so the 5 year housing supply contribution is 50 in year 5, meaning that construction would need to start around halfway through year 4. That allows 3.5 years for planning, sale, demolition etc. the may be

conservative, but matter well firm up during 2015/16 enabling a more positive view to be taken

Rear of St Peters Factory (MSN15)

- 2.142 This land is part brownfield/part greenfield and relates to the undeveloped part of a the mixed use allocation (GDS.1/NR4) of the BANES Local Plan (2007). The part of the allocation that has been developed was completed by Oval Homes for a mixture of residential (107 dwellings), an office, light industrial and construction trade retail units. This development took place prior to 2011 and therefore does not count toward the Core Strategy housing requirement 2011-29.
- 2.143 In October 2014 Oval Estates has submitted a planning application ([14/04003/OUT](#)) for the undeveloped land, originally for 91 units, but since reduced to 81 during the determination of the application. The reduction in the number of units on the site (by replacing flatted development with housing) has removed the objections of the Council's landscape architect and planning policy team.

Other Greenfield HELAA sites

- 2.144 In addition to the sites recently granted planning permission a number of other greenfield sites have been put forward for development in the Somer Valley Policy area. None of these sites form part of 5 year housing land supply. Neither do they form part of the identified supply for the Core Strategy period as a whole. On the current assessment of land supply, these sites are not required to delivered the Core Strategy housing requirement.

Greenfield HELAA sites of recent and immediate interest

- 2.145 Of recent and immediate interest are the following sites, five of which have been put forward by Edward Ware Homes.
- i. **Norton Radstock College (Rad 8)** had previously indicated that some of its land was surplus to requirements and could accommodate around 50 units. Pre-application advice was sought from Curo in July 2014 (14/03262/PREAPP). However, in December 2014 the college announced that it was to merge with Bath City College. This is likely to result in the land being used for educational purposes and so the site has been removed from plan period housing land supply assumptions.

- ii. **Land north of Fossey Gardens, Westfield (MSN 14c)**, where Radstock Land LP submitted an outline planning application ([13/00583/OUT](#)) for 92 dwellings in February 2013. This was refused in June 2013. This decision was appealed and hearings took place during March 2014. The Inspector reported in July 2014 (between the receipt of the Core Strategy Inspectors Report and the adoption of the Core Strategy) and dismissed the appeal. An alternative application for 73 dwellings ([13/03395/OUT](#)) was made in August 2013 and was refused in February 2014.
- iii. **Boxbury Hill, Midsomer Norton (MSN 27)**, where Edward Ware Homes submitted an outline planning application for 124 dwellings in November 2013. This was refused in February 2014 ([13/04880/OUT](#)). An appeal has been submitted and was heard (alongside two others in a con-joined arrangement) in January 2015. The decision will be published in May 2015.
- iv. **Grove Wood Road, Haydon, Radstock (Rad 31c)**, where a planning application ([14/00335/OUT](#)) was submitted by the Silverwood Partnership in January 2014 for 100 dwellings. This was refused in May 2014. An appeal was launched but was withdrawn in July 2014. A duplicate application ([15/01075/OUT](#)) was submitted in March 2015 and is being determined.
- v. **Land West of Northmead Road, Midsomer Norton (MSN 23)**, where a planning application ([14/00672/OUT](#)) was submitted by Edward Ware Homes in February 2014 for 44 dwellings and refused in August 2014. An appeal against this decision was submitted in April 2015.
- vi. **Thicketmead Farm, Midsomer Norton (MSN 24a)**, where a planning application ([14/00685/OUT](#)) was submitted by Edward Ware Homes in February 2014 for 72 dwellings and refused in August 2014.
- vii. **West of Wheelers Road (MSN 14a)**, where a planning application ([14/00649/OUT](#)) was submitted by Flower & Hayes in February 2014 for 35 dwellings. This is still being determined.
- viii. **Parcel 5922, Farrington Road, Paulton (Pau 11)** where Edward Ware homes were refused planning permission for 47 dwellings in January 2014 ([13/03547/OUT](#)). An

appeal has been submitted and was heard (alongside two others in a con-joined arrangement) in January 2015. The decision will be published in May 2015.

- ix. **Somerset Inn, Bath Road, Paulton (Pau x)**, where planning permission was refused for 22 dwellings in the garden to the rear in January 2014 (13/04606/OUT). An appeal was launched but withdrawn. An application for 16 dwellings was received in January 2015 and is being determined.
- x. **Parcel 0069, Church Road, Peasedown St John (Pea7b)** where Edward Ware Homes was resubmitted a planning application for 55 dwellings ([14/02547/OUT](#)) in June 2014. This was refused in September 2014.
- xi. **Upper Whitelands, Tynning Hill, Radstock (Rad x)** An outline planning application ([15/00855/OUT](#)) for 55 dwellings was submitted here in February 2015 by Davis Webb Management. See paras 2.151-152

Other Greenfield HELAA sites at Radstock & Haydon

Other undeveloped land within Radstock Conservation Area

- 2.146 Radstock is almost entirely designated as a [conservation area](#) on account of its industrial/mining heritage. The conservation area is extensive in order to incorporate the main coalmining areas, buildings and associated features which contribute to the historical form and character of the town.
- 2.147 The conservation also includes areas of open landscape reflecting the character of Radstock whereby the surrounding countryside comes close to the heart of the town without significant industrial development engulfing the coal mining areas as occurred elsewhere in Britain. It is a rare example of an early industrial landscape where small-scale mining existed in a rural community. The distinct topography reflects the distorted and faulted geological formation which made the coal-mining possible and ultimately gave rise to the character of Radstock which the conservation area designation seeks to preserve. A digital terrain model accompanies the HELAA site plans and proformas to demonstrate the distinct topography and how Radstock lies at the nexus of five surrounding valleys and the confluence of various watercourses.

2.148 The most conspicuous remains of this activity are the spoil heaps or ‘batches’ as they are known locally. In almost all case they have been planted and have become prominent features in the landscape. Their distinctive profile forms a historical marker where the forming mining had ceased. Other areas of open landscape have been included in the Conservation Areas where this has had a direct visual relationship with the core areas of industrial interest, where the open landscape has directly influenced the form and nature of development and where this contributes to the character of the conservation area. These areas can be distinguished from areas of open landscape outside the conservation area which may be important in the context of the setting but do not have such a close connection with the core areas of interest.

2.149 The Radstock Conservation Area statement usefully informs the suitability assessment of a number of areas and the key extracts are summarised below.

- Area 1 [Coomb End and Clandown] “the undeveloped southwest facing slopes below the Bristol Road are integral to the special character of the area”.
- Area 2 [Foss Way Ridge] – “should remain undeveloped”.
- Area 4 [Historic Core] - notes the “imposing appearance and significance of the hillside setting to the south (and its archaeological potential) and the importance of a meadow to the north of the primary school as part of the setting of St Nicholas Church, Manor Farm and the surrounding area”.
- Area 5 [Ludlow and Tynning]- “the large batch of Tynning colliery remains integral to the special quality of the town.....Lower Whitelands terraces are fundamental to the mining legacy of the Somerset coalfield....the fields to the south of Mill Road are significant to the character of the conservation area”.
- Area 7 [Writhington collieries] “the hillside north of Frome Road is of intrinsic importance to the special character of the area. From the valley, views of Tynning and Braydowns batches along with the associated miner’s terraces of Whitelands and Waldegrave, form significant focal points and add to the importance of this character area. Similarly, the reciprocal views from the opposite hillside, are dramatic and characteristic of the transformation of the natural landscape by the coal industry. There needs to be a presumption in favour of preserving these important views and

in partial further development should be avoided on the hillside below Frome Hill and along the valley to the south of Lower Braysdown”

Undeveloped land outside Radstock Conservation Area

2.150 Once the historical context and significance of underdeveloped of land within the conservation area is understood it serves to focus attention on areas outside the conservation area in respect of potential future housing land supply. However, the land beyond the conservation area plays a role of the setting of the conservation area, itself and this needs to be taken into account re suitability. The main areas for consideration can be reduced to Bath Old Road, Tynning Batch /Lower Whitelands, Writhington and Haydon.

Bath Old Road & Environs

2.151 This is an extensive area of plateau land to the north of Radstock. A landscape and visual impact assessment subdivides this area into eight areas (a-f). Based on the LVIA the SHLLA finds that only a relatively small area (16f) can be regarded as suitable for development (with appropriate mitigation). Rad.18 would also logically also form part of a development here. Rad 16g (with its potential connectivity to Trinity Primary School) has been considered carefully but is rejected.

Tynning Batch/Lower Whitelands

2.152 The HELAA does not regard the Tynning Batch/Lower Whitelands area (Rad.19) as suitable. This area has a long history of land availability and was once previously developed (with temporary miners housing), but has since been reclaimed by vegetation. It is a greenfield site. It is read as part of the open countryside that penetrates the framework on the town. Although not particularly attractive or valued in close view, it is a prominent and open part of the valley side and its development would be detrimental to the character and openness of the area. The openness of this land is also important in respect of the setting the conservation area. When viewed from the Upper Braysdown part of the conservation area, development here would appear against the background of the Tynning Batch and appear isolated and incongruous. Whilst Lower Whitelands terraces are also in view from this vantage point, part of their significance is that they were deliberately built some distance from the town centre on the 1840s – a townscape of social engineering to keep the miners away from the townsfolk.

2.153 The spoil heap to the south of Tynning Hill Road is open in part, although sloping. It is unlikely to be developable on account of ground conditions, meaning that is there was to be

development on the reclaimed part of the site (to the north of Tynning Road) there would be no physical linkage between developed here and the town proper, just an access road. Further, this road is not adequate to service a site of this size. Woodborough Lane might be able to provide part a highways solution, A small part of RAD.16h (a small field/ paddock SW of Ludlow of additional traffic on the operation of key junctions in the area would also need to be modelled. Ultimately the landscape and visual impact issues would remain.

Writhlington

- 2.154 The fields to the east Radstock at Writhlington, as the A362 Frome Road heads out of town, lie on a shoulder of the Wellow Brook Valley. The land is flat to gently sloping, rising up to Peaks Wood and a ridge of high ground occupied by the village of Faulkland (Mendip). The area is very open. The recent development of Writhlington Academy forms a prominent edge to this part of Radstock, at Knobsbury Lane. Further, planning permission has been granted for 53 dwellings in a triangle of Land between Knobsbury Lane and the A362 (Rad.27). The character of this area has changed in recent years and will change a little more once this permission is implemented. The area is some distance away from the town centre and the route to it is not a flat one. However, the area does benefit from close proximity to primary and secondary schools and a local shop. There is sufficient land here for the school to be expanded in necessary.
- 2.155 Development here would represent a major incursion into the countryside to the east of Radstock but a significant number of homes could be provided here. The capacity of the sites means that a transport assessment would be required to confirm whether or not development would have a severe impact on the highways network in the area and in the town centre. Accessibility seems less constrained. One access option to be investigated would be to take an access point from to A362, cutting through Rad26 (a) and then through Old Road into Rad.26. Most of Old Road (east of the school) could be left as a pedestrian, cycling route. The design of crossing pint would require careful consideration.
- 2.156 However, as set out in the Assessment, the landscape and visual impact would be high and negative to the extent that development would unacceptably urbanise this rural landscape with especially negative effects on the village characteristics of Writhlington. The overall judgement is that the area is not suitable for development

Hayden

- 2.157 Hayden sits separately from Radstock atop the Plateau to the south of Radstock along the Kilmersdon Road. Rad.31b & c is a large undeveloped part of the plateau which is visible from a wide area. It is important to the setting of the conservation area. However, from a landscape, visual impact and conservation area setting perspective part of this area facing Kilmersdon (Rad. 31c) is assessed as being suitable and could accommodate about 100 dwellings. Housing would be seen against the backdrop of existing development and would not detract from the setting of the conservation area. Conversely, Rad.31b is not suitable, the impact on the setting of the conservation area being too severe. For both areas there may be archaeological constraints that affect the developable area. From a highways perspective the flow of vehicles from development here into the town centre may be problematic re the operation of key junctions. A transport assessment would therefore be needed to confirm whether the network could absorb development here. Rad.31a is not suitable (see 2.110 - Area 4 , above).
- 2.158 Elsewhere in this Area Rad.32 at the junction of Haydon Hill and Kilmersdon Road appears to be suitable, at least in respect of frontage development. There may also be potential re the rest of this site but the Council would resist a larger incursion into this field. The impact of development at Rad.30 needs to be judged in the context of the permitted development at Rad.1

Other Greenfield HELAA sites at Midsomer Norton / Westfield

Welton Vale

- 2.159 A large part of this this area was viewed favourably by the Wansdyke District Council during the preparation of the Wansdyke Local Plan during the mid-late 1990s for a mixture of employment and residential uses. This plan never reached adoption stage but as part of the proposed development of this area a new ‘Welton Link Road’ would have connected the Radstock Road part of the A362 to the West Road part of the A362.
- 2.160 The current assessment is that this area is a sustainable location for development and is much closer to the centres of Radstock and Midsomer Norton than other large greenfield HELAA sites. However there are a number of environmental constraints which preclude development. These include, the Wellow Brook re flood risk and nature conservation, protecting the integrity of the Greenway as a linear leisure route, the Midsomer Norton and Conservation Area and its setting and listed building’s at Manor Manor Farm, potential

archaeological interest re the Fosse Way, achieving suitable access points, the effect of significant housing here on the operation of the highway network, and harm to landscape character.

Waterside Farm Area (north of Charlton Lane)

2.161 Housing development here would not be well related to the urban edge of Westfield, let alone the residential urban edge. The Westfield Industrial Estate is the dominant land use and immediately beyond this is the (undevelopable) ‘Snails Bottom’, steam valley. To the east of this MSN 36a and 36b cover an extensive generally flat and open area. The assessment concludes that the significance scores for both landscape and visual effects are both high and negative. Hence development in any or all of these land parcels is considered inappropriate and damaging to both the landscape itself and views of it. It would not be possible to mitigate for the loss of the integrity of the whole landscape which would occur even if development was partial.

A367 (Fosseway) and B3355 (Silver Street)

2.162 This area includes the recently permitted development of 165 homes at MSN31a ([14/04032/RES](#)). The remainder the MSN.31 area is suitable and developable. Areas (b) and (c) are outside BANES. Nevertheless it is useful to identify the role that they could play in the further development of Westfield. In September 2014 Strategic Land Partnerships submitted a highways pre-app in respect of 240 dwellings within MSN.31b (14/05025/PAHWDC). In January 2014 the Landray Will Trust submitted an outline planning application to Mendip District Council for the development of in MSN 31c for 150 dwellings. This has not been determined.

Withies Lane & Chilcompton Road

2.163 The rising ground to the east of Withies Lane (MSN.37) is not a suitable development area and there is very limited land availability here. The fields immediately adjoining Chilcompton Road (MSN.38) are also regarded as being unsuitable. The Assessment concludes that development would be too damaging to the landscape itself and views of it, with no scope for effective mitigation in.

Eastern Boundary with Mendip - Folly Hill and Underhill Lane

2.164 There is no evidence of land availability or suitability in this area of Midsomer Norton. MSN.22 (though its availability is historic and not current) Further, only suitable access would be from Orchard Vale and would require the demolition of the Community Hall.

Old Mills/A362 (MSN.26)

- 2.165 MSN.26 is allocated in the BANES Local Plan (2007) for employment development (against the recommendation of the Inspector dealing with that Plan, on account limited evidence of demand and less harmful alternative options). She also noted in her report that this was a sensitive location (8.61). The two southerly fields were previously allocated in the deposit draft of the unadopted Wansdyke Plan. MSN.26 has been earmarked since the mid 1990s for employment development but this has not been forthcoming. NPPF: 22 is applicable here in respect of the long term protection of land for employment uses where there is no prospect of this being delivered. The landscape and visual impact of employment development here was considered acceptable during the preparation of the BANES Local Plan and residential development would likely be less harmful in appearance, although the perceived benefits may be less. However, the less than positive assessment in the HELAA has been undertaken within the context of the latest GVLIA. Further, the area is somewhat dissociated from the main body of the town and the current Assessment concludes that residential development here would not be appropriate.

Other Greenfield HELAA sites at Paulton

- 2.166 The on-going redevelopment of the Polestar Printing Factory (Pau1 and 2) represents a major addition to housing supply (500+) for a village with the services and facilities of Paulton. There seems little justification for a further expansion of the village during the plan period. Nevertheless, there are a limited number of suitable and available sites. Primary education places within the village represent a constraint on further development granted.

Other Greenfield HELAA sites at Peasedown St John

- 2.167 Peasedown St John grew significantly as a commuter village to Bath in the 1990's and early 2000's to the extent that development was able part fund the bypass to the east.
- 2.168 Future housing land supply prospects can be divided into two broad areas; firstly there is the intimate and intricate area, framed by narrow lanes between the Bath Road and Lower Peasedown/New Buildings, where there are some very limited opportunities, before the very exposed slopes of the Cam Valley are reached which are inviolable. The digital terrain

model shows the topography here and cross valley views from the Tunley Road reveal how Peasedown is seen in wide views from the north.

- 2.169 Secondly, more extensive land availability is evident to the south of the A367 bypass, around Brasydown Lane, and between the A367 and Camerton Wood. This is physically capable of accommodating development but the landscape and visual impact would be very high and development would represent a major breach of the contained nature of the village re the A367 bypass. It hard to envisage much more than an isolated housing estate, with little connection to the village in these locations.

Rural Areas

- 2.170 Much of Bath and North East Somerset is rural and comprises small to medium sized villages. During the previous BANES Local Plan period and during earlier plan periods, these villages made a significant contribution to housing land supply. These villages have grown over time as a result of planned growth and the allocation of land for development. They have also been the source of a considerable number of small windfall developments within the housing development boundaries. The Core Strategy apportions 1,100 dwellings (about 60 per annum) to the rural areas over the plan period 2011-29. That is about 8% of planned growth.
- 2.171 Within the spatial strategy for development, villages are categorised based on their sustainability credentials, and their future growth role is also related to whether a Green Belt constraint present. Alongside small scale infilling within current housing development boundaries the Core Strategy creates a framework for the identification of large sites (of 10+ units) to accommodate around 50 units (in RA1. villages outside the Green Belt) and 10-15 units (in RA.2 villages outside the Green Belt). Seeking development on large site enables affordable housing to be secured. Housing will not be secured at any cost if the harm to the village and its setting outweighs the benefits of the new housing.
- 2.172 There is a mixed picture of land availability and suitability across the rural areas that is not easy to summarise. In short the assessment reveals that there are options available to deliver the spatial strategy of the Core Strategy and respond to NPPF: 54 in respect of the requirement for LPAs to plan housing development to reflect local needs particularly for affordable housing.
- 2.173 A number of parish councils are undertaking neighbourhood plans to identify sites. The Placemaking Plan is also in preparation to do the same. This is at Options stage. In some cases sites have already been permitted, notably prior to the adoption of the Core Strategy.

RA.1 Villages outside the Green Belt

2.174 Bishop Sutton, Clutton, High Littleton, Farrington Gurney, Temple Cloud, and Timsbury currently meet the sustainability criteria that is required to achieve of RA.1 village status.

Bishop Sutton

2.175 Bishop Sutton has received its 'quota' of dwellings identified for it in Policy RA.1 on two large sites (yielding 76 dwellings between them) at:

- **Cappards Road (Bis 3a)**, where Edward Ware Homes submitted an outline planning application ([12/04238/OUT](#)) for 35 dwellings in September 2012. This was reported favourably to Development Control Committee in March 2013. Planning permission was issued in February 2014 on completion of a S106 agreement. Edward Ware then sold the site to Charles Church who submitted a reserved application ([14/00544/RES](#)) in February 2014, which was permitted in June 2014. The site is under construction under the marketing name *Herriots End*.
- **Wick Road (Bis 2)**, where Barratt submitted a full planning application ([12/05279/FUL](#)) for 41 dwellings in December 2014. This was refused in April 2014 and the decision was appealed. Hearings took place in August 2013 and the appeal was allowed in September 2013. The site was launched as *Oak Court* in August 2014, with the completion of the show home. First completions were recorded in 2014/15 and the site will complete in 2015/16.

2.176 In November 2013 Edward Homes submitted an outline application to **extend the Cappards Lane site** by 32 dwellings ([13/04975/OUT](#)). This was refused in March 2014 and is being appealed. A decision is expected in May 2015.

2.177 Elsewhere in the village an application outside the HDB for:

- 9 dwellings to the north of **Stitchings Shord Lane** ([13/02728/OUT](#)) was submitted in June 2013. This was refused in April 2014. An appeal was launched and was dismissed in January 2015.
- 9 dwellings at **Ham Lane** ([14/00336/OUT](#)) was submitted in January 2014. This was refused in March 2014. An appeal was launched and was dismissed in January 2015.

Clutton

- 2.178 Clutton has also received permissions its 'quota' of dwellings on large sites. Both of these sites are deliverable in the next 5 years
- In April 2012 Curo submitted a planning application for 36 dwellings at **Maynard Terrance** ([12/01882/OUT](#)). This was refused in December 2012 and the decision was appealed. The appeal was allowed in July 2013. There was no 5 year land supply at this time. An application for reserved matters ([14/05692/RES](#)) was received in December 2014 and is being determined.
 - 15 dwellings were also permitted at **The Wharf** in April 2015 ([12/00293/FUL](#)). The applicant was the landowner and the site will need to be sold to a developer. A small scale developer (Chew valley Homes) has been active in the immediate vicinity of the site suggesting that the permission will have a buyer.
- 2.179 In the immediate vicinity of the permitted Maynard Terrace site two further applications to the south and east ([14/00039/OUT](#) and [14/00041/OUT](#)) were submitted in January 2014 (by Edward Ware Homes, again) for 36 dwellings and 37 dwellings. Both of these applications were refused on April 14th 2014. Even they were refused duplicate applications were submitted on April 10th 2015. These are being determined.
- 2.180 Elsewhere in the village Barratt submitted an application in November 2011 for 55 dwellings between Station Road Church Farm ([11/04955/FUL](#)). This was refused in March 2012. The decision was not appealed lodged.

High Littleton

- 2.181 Within the HELLA no suitable site has been identified at High Littleton either within or outside the Green Belt. However, a number of land parcels have been promoted availability, both currently (outside the GB) and historically (within the GB). During the preparation of the Core Strategy, A 50 dwelling contribution from High Littleton towards meeting the overall rural /district housing requirement was not 'relied' upon to meet the rural or district wide housing requirement for, on account of the lack of identification of suitable sites. The Placemaking Plan process will determine whether there is a suitable site or not.
- 2.182 In respect of development management activity, in January 2014 Edward Ware Homes submitted a planning application for up to 71 dwellings at **Langford's Lane**

[\(14/00038/OUT\)](#) This was refused in April 2014. An appeal was launched at the end of October 2014. The hearings will take place at the end of May 2015. The Council evidence to this appeal is the *de facto* HELAA view of the site. Prior to the application, the site was not submitted to the HELAA by the land owner/developer. Though the HELAA was proactive in looking at land around High Littleton this site was not assessed on account of not being a reasonable contender, it being disassociated from the framework of the village.

- 2.183 Within the village Curo is developing 9 affordable units on the former co-op site (13/04514/FUL). This is an unexpected affordable housing windfall, which would have normally taken a further 21 market units (i.e. 30 overall) to make viable

Farrington Gurney

- 2.184 There is currently no committed housing land supply on large sites at Farrington Gurney. The identification of a site(s) will take place within the process of producing the Placemaking Plan. No site has yet been confirmed as being available but suitable areas have been identified and investigations are on-going. The Duchy of Cornwall is the major land owner in this area and has shown itself as a willing agent in achieving housing land supply (e.g. the promotion of 1,500 homes to the west of Bath. The capacity of the primary school to take more children, and the inability of the school to expand within its current site is an issue to overcome as there are no other schools within walking distance on a safe route. There is land adjoining the school that, in theory, could be utilised. The Placemaking Plan will attempt to overcome the issues. The contribution sought from Farrington Gurney does not form part of 5 year housing land supply, although it is relied upon to contribute to the overall rural housing spatial strategy.

Temple Cloud

- 2.185 An outline planning application (made by the landowner) was refused (against officer recommendation) for 70 dwellings on land to the south of Temple in Lane in August 2014 ([13/03562/OUT](#)). This decision has been appealed and the hearing will take place in June 2014 Even if the appeal is dismissed a smaller scheme of nearer 50 dwellings would almost certainly be submitted. The Placemaking Plan Option consultation sets out a preferred strategy of achieving 50 dwellings either side of Temple Inn Land rather than wholly to the south. The traffic impact on the A37 junction of a split development, assuming no new access from the northern site, would be the same as for a single development. Landscape

impact was not a reason for refusal on the land to the south and the options document / emerging allocation to the north suggests that there is no issue here either.

- 2.186 Elsewhere in the village the redevelopment of part of the curtilage of the Temple Inn (PH) for 9 dwellings contributes as small windfall site (being less than 10 units) for which a windfall allowance is made for the rural areas as a whole. Allow the allowance is based mostly on the trend for development of 1-2 units, the trend does reflect the occasional larger site of less than 10 dwellings.

Timsbury

- 2.187 There is currently no committed housing land supply on large sites at Timsbury. The identification of a site(s) will take place within the process of producing the Placemaking Plan. Two preferred sites, totalling 50 dwellings have been identified in the Placemaking Plan Options consultation (Nov 2014). The first relates to a former concrete batching site (Wheeler & Co) on the western edge of the village. In 2009 Flower and Hayes submitted an application for 27 dwellings here (09/02468/FUL) but it was never determined and no appeal against non-determination was made. The developer intends to develop the site but cites the avoidance of overage costs as the reason for not pursuing development sooner. Flower and Hayes have confirmed that the site is on their reader for development within the next 5 years. The Placemaking Plan identifies a preferred greenfield site to make up a further 25 dwellings, and this site is supported by the Parish Council.

RA.1 Villages surrounded by Green Belt

- 2.188 The preparation and examination of the Core Strategy established that there were no exception circumstances to develop undeveloped land in the Green Belt adjoining RA.1 villages – aside from at Whitchurch. Here, in addition to safeguarded land now being development by Barratt for 47 homes ([11/02193/FUL](#)), land was removed for a further 200 dwellings see para 2.83.
- 2.189 Elsewhere land was also safeguarding in the BANES Local Plan (2007) at Farmborough for development post 2011. Blue Cedar Homes have been granted planning permission for 35 dwellings here ([13/04194/RES](#)). This site is supplemented by ([12/04318/OUT](#)) for 12 dwellings on largely undeveloped land within the HDB. A reserved matters application has now been submitted ([14/02426/FUL](#)). A further site (PDL in the Green Belt) has been permitted for 14 units (14/00862/OUT).

- 2.190 The other large villages surrounded by Green Belt include those immediately to the east of Bath (Bathampton, Batheaston and Bathford) where there is very limited availability and suitability and Saltford. At **Manor Road, Salford** Crest was refused planning permission for upto 99 dwellings ([12/05315/OUT](#)) in April 2013. An appeal was dismissed in April 2014 on Green Belt reasons. Otherwise, the site is in a sustainable location and is suitable

RA.2 Villages

- 2.191 The Placemaking Plan is currently in the process of identifying sites for a modest amount of development (10-15 units) at seven RA.2 villages that is commensurate with the size, function and services of such villages. We assume the lower end of the range for now but up to 15 dwellings at each village on suitable sites is acceptable in-principle.
- 2.192 It is quite likely that at least some of this supply is deliverable within the next 5 years. For example in March 2015 Bloor Homes submitted an outline application 15 dwellings at Wells Road, Hallatrow ([15/01335/OUT](#)).

Windfall potential from small sites & broad locations

3.1 NPPF 48: advises that LPAs may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the HELAA, historic windfall delivery rates and expected future trends, and should not include residential gardens (or other land that is classified as greenfield). The Council includes such an allowance for the rate of delivery on small sites (less than 10 dwellings). The NPPG also advises that a windfall allowance for broad geographical locations can also be made for the medium to longer term.

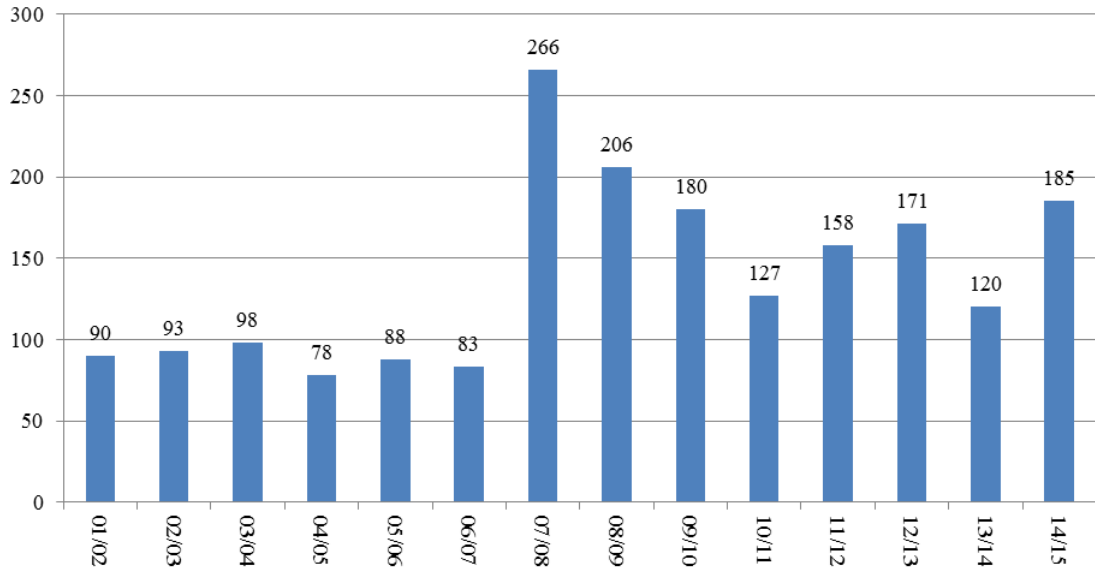
3.2 The Council's small site windfall allowance is based on an analysis of the past rate of completions (rather than permissions). The rolling 5 year average rate of delivery (discounted to take account of green field development) forms basis for the allowance for the next five years and beyond. For 5 year supply purposes the expected number of dwellings that will be completed overall is compared to the existing stock of permissions. The windfall allowance is the difference between two, meaning that the output is always 'controlled'. The windfall allowance is therefore variable. A high rate of permission in a year would result in a lower allowance and vice versa.

3.3 Small sites (under 10 units) have consistently contributed to housing development across BANES. The data overleaf shows that:

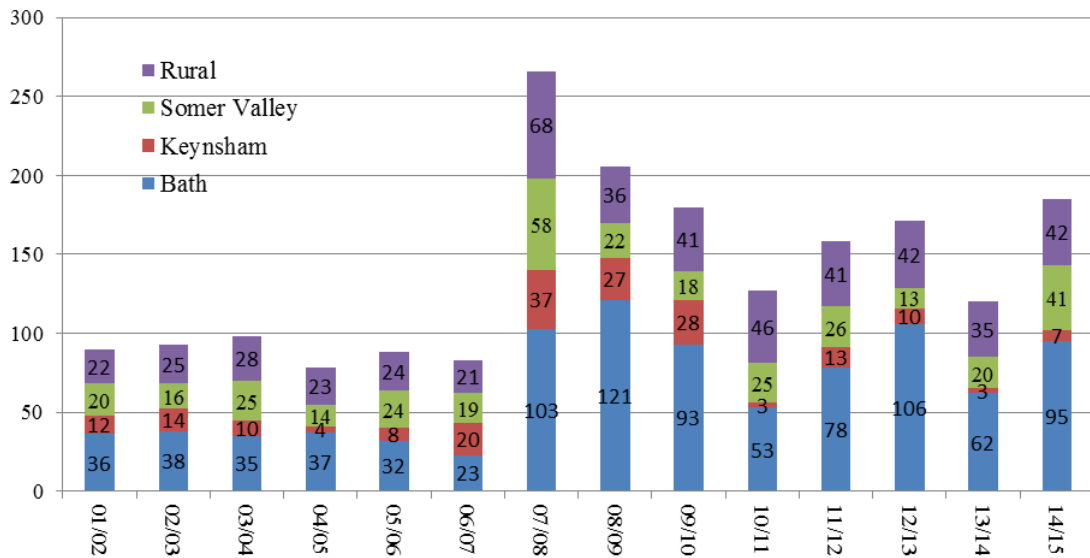
Period	No. years	Observations
2001/02 -14/15	All 14 years	Housing development on small sites contributed an average of 139 units a year .
2001/02-05/06	First 6 years	The rate of delivery was lower and relatively stable at 90 units a year
2007/08 -14/15	Last 8 years	The rate has been higher but more variable and has averaged 177 units a year
2010/11-14/15	Last 5 years	The 5 year rolling average is 150 units per year

3.4 During the last 5 years Bath accounted for 52% of small site completions, Keynsham 5%, Somer Valley 16% and the rural areas 27%.

Historic small site completions data for BANES



Historic small site completions data by policy area



3.5 If the rolling 5 year average of delivery is projected forward for the 5 year supply period 2015/16 – 2019/20 it would yield **750** units from small sites. However, this results in double counting if sites with planning permission are not discounted.

3.6 At April 1st 2015, the stock of small sites with planning permission was **550** and for the purposes of calculating the windfall allowance it is assumed that these units will be implemented within the next 5 years. Against this background the windfall allowance for the next 5 years from 2015/16 would be **200**.

3.7 The analysis so far has not been adjusted in respect of the need to remove the greenfield component (residential gardens, barn conversions and other previously undeveloped sites) from the past trend in small site completions. Since 2006, 20% of small site completions have been on such sites. On this basis, the unadjusted five year windfall allowance of 250 is adjusted to 200 (or 40 per annum).

3.8 For the purpose of the housing delivery trajectory (Appendix 2) the Council assumes that these 200 units will come forward in line with the geographically pattern of small site completions seen in the last 5 years, resulting in the following distribution. It is the figure in the final column that appears in the housing trajectory as the windfall allowance for the next 5 years.

	Share	Total	Per Annum	Per annum Rounded
Bath	52%	104	20.8	21
Keynsham	5%	10	2	2
Somer valley	16%	32	6.4	6
Rural	27%	54	10.8	11
BANES	100%	200	40	40

3.9 Projecting forward an unadjusted allowance of 150 per annum for the remaining 9 years of the plan period (2020/21 to 2028/29) would result in a total of 1,350 units being delivered across BANES. However, Once this figure is adjusted by 20% re the discount for the greenfield trend development, this reduces to 1,080 units (120pa).

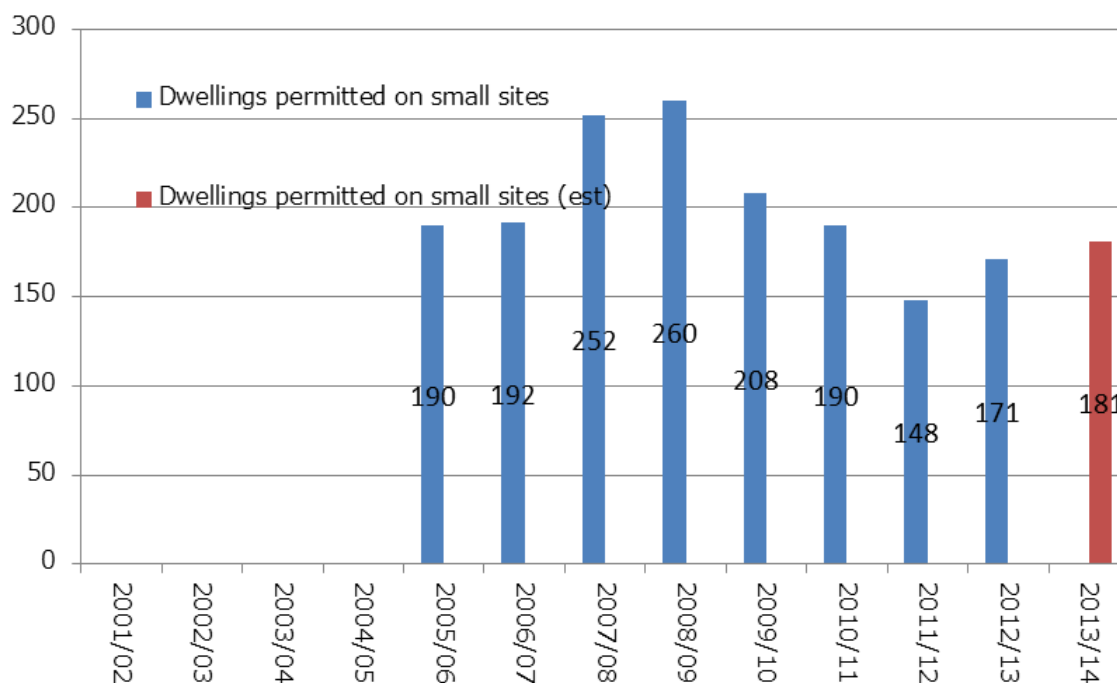
3.10 Again, for the purposes of preparing the housing delivery trajectory the Council has assumed that, geographically, these 1,080 units will come forward in line with their historic distribution re the broad locations of past delivery (see paragraph 3.8).

	Share	Total	Per Annum	Per annum Rounded
Bath	52%	561.6	62.4	62
Keynsham	5%	54	6	6
Somer valley	16%	172.8	19.2	19
Rural	27%	291.6	32.4	32
BANES	100%	1,080	120	119

Other Evidence

3.11 In addition to forecasts based on the past rate of completions the Council also justifies its small sites windfall/broad location allowance by reference to the rate at which permissions have been granted. The average annual number of units permitted on small sites granted over the last 9 years is 199. The figure of 181 for 2013/14 shown in the graph below is an estimate based on 106 permissions being granted in the 7 months April-Oct 2013.

3.12 Further, the permissive planning policy context that enabled the past rate of completions/permissions has not changed with the adoption of the Core Strategy



Performance against the housing requirement for 2011-2029 and 5 year housing supply position

- 4.1 Delivery performance to date is set out in appendix 2 of the HELAA. This is the housing delivery trajectory and comprises an excel workbook with a separate worksheet for each part of the district and a summary worksheet for the district as a whole in which the 5 year requirement and supply position is set out.
- 4.2 The ‘Sedgefield’ approach is applied to the 5 year land supply calculation to that any shortfall in delivery that is evident at the start of the five year period is made good by the end of that period, rather than over the remainder of the entire plan period. A 20% buffer is applied on account of past persistent under delivery.
- 4.3 The table below shows that BANES needs to deliver 6,458 dwellings by the end of the 2018/19 monitoring year. Given progress to date there is a residual 4,312. Applying a 20% buffer means that a deliverable supply of 5,174 dwellings must be identified. This is exceeded to the extent that a 53% buffer can be identified

Item	Dates	#
Total Planned Provision	2011-29	13,000
Built over years 1-4	11/12 - 14/15	2,190
Plan requirement for years 1-9 (5 years hence)	11/12 - 19/20	6,498
5 year Supply Requirement (100%)	14/15 - 19/20	4,308
5year Supply Requirement (with 20% buffer)	14/15 - 19/20	4,523
5 year Supply Requirement (with 20% buffer)	14/15 - 19/20	5,170
Deliverable Supply (#)	14/15 - 19/20	6,424
Deliverable Supply buffer (%)	14/15 - 19/21	49%
Deliverable Supply (#) over 100% requirement	14/15 - 19/22	2,116
Deliverable Supply (#) over 120% requirement	14/15 - 19/23	1,254

* A 20% buffer is applicable from 2015/16- 2019/29