

Bath and North East Somerset Local Plan

Strategic Housing Land Availability  
Assessment

Findings Report  
(PCSCS.V2, June 2013)



## **Strategic Housing Land Availability Assessment June 2013 - 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 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 Strategic Housing Land Availability Assessment (SHLAA) is part of the evidence base for the Local Plan. The assessment is required by NPPF: 159. The SHLAA supports the preparation and review of the Local Plan. It presents a 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 to meet the identified need for housing over the plan period. The objectively assessed need for housing is set out in the Strategic Housing Market Assessment (SHMA).
- 1.2 The SHLAA 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 SHLAA (PCSCS.V2) accompanies the Proposed Changes to the Submission Core Strategy (March 2013 post consultation). It updates an earlier version (PCSCS.V1) that was published during the consultation period on those changes. The current version takes into account completions during 2012/13, evidence submitted during the consultation period and on-going intelligence gathering. During and after the consultation period on the Proposed Changes the Council has contacted the developers of sites (with and without planning permission) to ascertain realistic delivery assumptions in respect of 5 year land supply.

## National Planning Policy Context

- 1.4 NPPF:47 requires that that local planning authorities :
- 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 and 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 completion 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 period<sup>1</sup> 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.

- 1.5 The Council accepts that a 20% buffer is applicable on account of the shortfall in housing delivery experienced during the Local Plan Period 1996-2011 of 1,167. This represented a 17% shortfall in delivery against a target of 6,855. The 20% buffer will persist until the Local Plan backlog is cleared and delivery catches up with the cumulative total required by the annualised rate of the Core Strategy requirement. The reversion to a 5% buffer is forecast from 2016/17 and this is shown in the 'summary tab' of appendix 2.
- 1.6 Rather than prepare a Housing Implementation Strategy as a separate document the Council relies on the SHLAA to fulfil this function. Appendix 2 sets out what the Council considers can be delivered during 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 progress). It is important to remember that this years, sixth year will soon become next years fifth year and that to maintain a 5 year supply means looking ahead and enabling/securing medium term land supply.
- 1.7 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 SHLAA, historic windfall delivery rates and expected future trends, and should not include residential gardens. The Council includes such an allowance and this is evidenced in Section 3 of this report. The Council also makes an allowance for windfall beyond the next 5 years (ref: Core Strategy Examination Document ID/28: 2.5).
- 1.8 The SHLAA 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 planning permission 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. SHLAAs often identify more suitable, available and achievable land than is required to meet the objectively assessed need for housing. Therefore, only the most suitable, sustainable and deliverable sites will be selected for development.

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<sup>1</sup> See appendix 2

1.9 Although sites can only be allocated in the Local Plan they can still come forward independently of plan-making via the Development Management Process, particularly on land where the presumption in favour of sustainable development is applied. The determination of planning applications will continue in parallel with plan-making.

## Methodology

1.10 The geographic scope of the SHLAA covers:

- Land within Bath and in the Green Belt adjoining Bath
- Land within Keynsham and in the Green Belt adjoining Keynsham
- Land in the Green Belt to the South East of Bristol
- Land within and adjoining Midsomer Norton, Radstock, Paulton and Peasedown St John – collectively referred to as the Somer Valley
- Land within and adjoining Batheaston, Bathampton, Bathford, Bishop Sutton, Chew Magna, Corston, Clutton, East Harptree, Farmborough, High Littleton, Temple Cloud, Timsbury, Saltford and Whitchurch

1.8 The SHLAA comprises assessments of land parcels promoted by developers and landowners within and adjoining housing development boundaries. 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 Council's enabling role to pursue the most sustainable opportunities (as far as they are deliverable). Therefore, the SHLAA attempts to provide a comprehensive 360 degree assessment of all the land adjoining a settlement where resources permit. Additional land availability continues to be presented to the Council on an ad hoc basis as landowners learn of and engage with the plan-making process.

1.9 Beyond the settlements listed in 1.7, the Council has not actively sought to identify sites for housing as the level of potential will be less strategic in nature. 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

1.10 A number of related studies have been prepared that have relevance to the SHLAA. Where these studies are relevant to a specific site they are indicated on the site assessment forms (appendix 1)

- Urban Design Review of Bath City Centre Sites (May, 2009).
- Urban Design Review of BWR East / Green Park Station (April, 2009).
- Bath Building Heights Study.
- Economic Regeneration Delivery Plan for Bath (March, 2011).
- Economic Regeneration Delivery Plan for Keynsham (March, 2011).
- Economic Regeneration Delivery Plan for Midsomer Norton (March, 2011).
  
- Economic Development Floorspace requirements (March 2013).
- Development Concept Options Reports for Green Belt Sites at West of Twerton, Odd Down, Weston, East Keynsham, South Keynsham, West Keynsham, Whitchurch and Hick Gate (Arup, March 2013).
- Green Belt Review (Arup, March 2013).
- Transport Assessment of Green Belt Sites (Arup, 2013)

1.11 Whilst no stakeholder panel has been convened during the preparation of the SHLAA, 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 or capacity of a site. The Development Management process or Place-making Plan will determine the precise yields of individual sites. 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.

1.12 The SHLAA has its own particular lexicon i.e. suitability, availability, achievability. These terms are defined in the [SHLAA Practice Guidance \(CLG, 2007\)](#).

## Key Findings of the Assessment

- 2.1 The site assessments (appendix 1) set out the Councils view on the housing potential, suitability, availability and achievability of individual sites. Land deemed suitable for forming part of the identified supply for the plan period is presented in the housing trajectory (appendix 2). Appendix 2 is the best place to understand the Councils 5 year land supply position in respect of the Proposed Changes to the Submitted Core Strategy and can be adjusted to show the position in respect of the latest CLG Household Projections or any other number. It presents capacity and delivery assumptions on all sites that can be reasonably expected to yield housing in the next 5 years (and beyond).
- 2.2 The following section is less a summary of the 5 year supply position (which is set out in mathematically in detail and in summary in appendix 2) and more an overview of the land supply position the district for the whole plan period. The focus is on the more strategic developments sites in the District, where there is often most complexity or uncertainty. Of course, a number of the observations made are directly relevant to 5 year land supply matters.

## Land within Bath

- 2.3 The SHLAA concludes the built up area of Bath, outside the Green Belt, can deliver about 5,622 dwellings on suitable and available (or reasonably likely to become available) sites between 2011/12 and 2028/29. To this can be added a windfall allowance of 780 (See Section 3) resulting in a total estimated supply of 6,402.
- 2.4 How this figure is arrived at on a site specific basis is shown in the housing trajectory (appendix 2). The supply figure for land within Bath represents all sources of identified supply for Bath less the proposed green belt or greenfield allocations at Weston, Odd Down and Royal High, Lansdown. The following paragraphs explain the current position in respect of some of the key sites.

### Western Riverside

- 2.5 Western Riverside is a large, mostly residential-led, allocation of the extant BANES Local Plan (Policy reference GDS.1/B1). It comprises a number of development parcels.

### Western Riverside – Crest

- 2.6 The largest single site within Western Riverside is being developed by Crest Nicholson and outline planning permission was granted here in December 2011 for 2,281 flats and townhouses



(06/01733/EOUT). At the same time reserved matters were also granted for the first phase of development, comprising 299 homes. 206 of these were completed between 2011/12-2012/13 and the remaining 93 are under construction.

- 2.7 To the east of this first phase, reserved matters were approved in April 2013 (12/05590/RES) for 26 houses and apartments (Block B1). This area forms the eastern limit of the Crest outline application area as it adjoins the car park of Homebase (which is part of BWR East). In May 2013, reserved matters were granted for building B17 (12/05387/ERES). This is an affordable housing block of 55 apartments.
- 2.8 Crest will be submitting reserved matters applications for buildings B5, B6, B10c, B11, B12, B13, B15 and B16 during 2013. The aggregate capacity of these blocks is 440. Crest expects to deliver these blocks, alongside B1 and B17, by April 2018. This means that BWR will yield 820 units in total by this time. This capacity relates to the land that currently in the control of Crest within the parameters of 06/01733/EOUT.
- 2.9 Building B17 and most of the remainder of the other buildings within Crests secured land area fall within an HSE exclusion zone in respect of the Windsor Bridge Gas Holders. The occupation (as opposed to the delivery) of these buildings is dependent on the decommissioning of the gas holders as an operational facility. Further phases (on the unsecured land) will require the actual removal of the gasholders and associated land remediation.
- 2.10 The cost and time required to decommission and remove the gasholders and remediate the land represents a significant barrier to the delivery of the secured & unsecured land. These barriers also affect the development other development sites within BWR and Twerton Riverside. A second barrier is reached upon the occupation of 650 homes in respect of the need to provide a new bridge for traffic and pedestrians across the Avon.
- 2.11 The West of England Revolving Infrastructure Fund (RIF) will be utilised to address these matters. The latest position in respect of the RIF was presented to [Cabinet on April 10<sup>th</sup> 2013 \(item 188\)](#). The report to Cabinet demonstrates that a timely resolution in respect of enabling the development of the secured and unsecured land can be achieved. The housing delivery trajectory for the next 5 years reflects the programme to decommission the facility and the intent of Crest. Beyond this point there is more uncertainty (as Crest need to secure the land from other owners). However, Crest remains committed to the entire site and has confirmed that the longer term delivery trajectory to 2029 (averaging 130 pa) is an achievable assumption.

- 2.12 Part of the unsecured land relates to the Council's waste facility on the upper Bristol road – that part of the part of the outline planning application area to the north of the river. The relocation of this facility currently remains unresolved, however the plan period still has many years to run and it is highly likely that this matter will be addressed in time to enable the delivery of this area.

#### Western Riverside – Eastern Area

- 2.13 The eastern part of Western Riverside is now subject to a planning application for a supermarket-led development led by Sainsbury's (13/00983/EFUL). The application proposes that the existing Sainsbury's store relocate to the current Homebase site that the existing Sainsbury's store remains in A1 use. It also proposes about 300 townhouses and flats and some office space. 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 current site until 2020. This could delay the implementation of planning permission if it was granted and alternative premises cannot be sourced to the satisfaction of Homebase. Given this uncertainty the housing trajectory does not budget for delivery here until after 2020.
- 2.14 The Sainsbury's application area excludes the Help Hire gyratory site (currently in office use with dedicated car parking) and some dated commercial units on James Street West but these locations are also available for redevelopment. Much of the James Street West area will soon be subject to a planning application for c.180 student bed spaces. 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. The Help Hire Site has been promoted during the consultation period on the Proposed Changes to the Core Strategy for retail use and car parking. There may be some synergy here in respect of the future of Homebase.

#### Western Riverside – North Bank

- 2.15 The final component of Western Riverside relates to that part of the site that lies between the River Avon and Upper Bristol Road (excluding the existing Council waste depot, which falls within the area covered by (06/01733/EOUT). To the extreme west is the vacant Windsor Bridge Road site and Victoria Park Business Centre. There are also some residential-led redevelopment opportunities to the east that are currently in light industrial and sui generis use. In total this riverside strip could yield about 300 houses and apartments. Only 15 units (King 13: Rear of Argos) form part of the 5 year supply forecast.

## City Centre

2.16 The SHLAA assumes that Avon Street Coach and Car Park and Manvers Street Car Park/Police station/Post Office Depot will be redeveloped for a mix of uses and will contribute 250+ apartments as part of employment-led mixed use schemes. The precise mix of uses will be refined in Placemaking Plan and via the determination of planning applications. The Council owns the car park sites and the Police and Royal Mail have signalled the medium to long term availability of their. None of the sites form part of the 5 year land supply.

2.17 The estimated capacity of residential units on these city centre sites has increased in relation to the Submission Core strategy SHLAA on account of the application of new employment densities research from the [Homes and Communities Agency](#). This advises that office occupiers utilise about 25% less floorspace per worker than they did 10 years ago.

*“Occupational densities for all office types have increased significantly since the publication of the 1<sup>st</sup> Edition of this Guide in 2001 (see Appendix 6 for a comparison). This is supported by anecdotal evidence that shows there is now much greater awareness amongst occupiers of the relationship between space efficiency and cost of occupation. Higher densities are achieved through more efficient space planning, new ways of working and improved communications technology”.*

2.18 Previously, the general office density was 19 sqm GIA per worker. Now it is 12 sqm NIA per worker. This converts to 14 sqm GIA per worker. Thus 25% less floor space needs to be allocated to achieve the office space requirements for Bath re the LEP Business Plan, and more space can be identified for residential or other town centre uses.

2.19 Flood Risk is a key suitability and achievability issue for these sites. The Council has presented a [sequential & exceptions case \(CD9/FR3\)](#) in respect of the developability of housing as part of mixed use schemes in such locations. Working with the Environment Agency, the Council has agreed a technical solution capable of delivery. This will utilise the RIF and is discussed in the detail in the [April 10th 2013 Report to Cabinet \(Item 188\)](#).

## Former MoD sites at Ensleigh Foxhill and Warminster Road

2.20 In March 2013 the Defence Infrastructure Organisation (DIO) announced that it had disposed of these sites.

- 2.21 The capacity of the Foxhill site is about 700 and has been bought by Curo, the Districts main social landlord. The involvement of Curo may result in a greater proportion of affordable housing coming forward on this site than the emerging policy requirement of 30% requires. For now though 30% affordable housing is assumed. An application for demolition works is expected imminently and Curo will be submitting a planning application for the site in Spring 2014. They expect to be delivering on-site from June/July 2015.
- 2.22 The capacity of Ensleigh is estimated by the Council to be about 350. The core part of the site has been bought by Spitfire Properties LLP. About 1/3 of the core part of Ensleigh is subject to a leaseback agreement with the DIO until 2018 but the remaining 2/3 is available now and can be delivered in advance of leased back area becoming available. Spitfire aim to have achieved planning permission for the site by Q1 2014. A small part of the site lies the south of Granville Road. This has been bought by Skanska, and a planning application for 40 houses and apartments was submitted in February 2013 (ref: 13/00734/FUL). Spitfire think that the overall capacity of MoD Ensleigh to be nearer 300 than 350.
- 2.23 The Council has identified that the Royal High Playing Field immediately adjoining Ensleigh is available and that development here would increase the overall capacity of the area by 120 to 470. The site has yet to be marketed by the school. The Proposed Changes to the Submitted Core Strategy allocate this additional land for development. The additional land is not in the Green Belt or Cotswolds AONB. The site does not form part of the 5 year land supply as it has yet to be marketed for sale.
- 2.24 The capacity of Warminster road is about 120 and this site has been bought by a consortium comprising Square Bay, Firmstone and Edward Ware Homes. Square Bay confirm that they are looking to move forward relatively swiftly to the extent that first completions can be expected during 2015/16. The consortium considers the capacity of the site to be nearer 250 but little detailed evidence has so far been forwarded to justify this assertion and the SHLAA assumption remains at 120.
- 2.25 Collectively the capacity of all three sites (including the extension to Ensleigh) is considered by the Council to be about 1,300.

#### Other Sites

- 2.26 The identification of 100 units on the Bath Press and 150 units at Twerton Park are two new additions to the SHLAA. The former reflects the refusal of a planning application for a large supermarket on this site, although an appeal is scheduled for July 2013. The identification of 100 units reflects the contribution that high density housing could make to a mixed use development of this 2.2 ha site. The

addition of Twerton Park reflects the position of the Football Club that their continuing occupation of this facility is not economically sustainable. Neither site forms part of the 5 land supply at present.

- 2.27 The latest significant addition to the identified supply sites for the Core Strategy period is NEW.1. The short term availability has now been confirmed. A pre-application enquiry has been submitted in respect of residential development and the site has been placed in the 5 year of deliverable sites. The prospects applicant is proposing 180 units but the SHLAA budgets for about 100 units based upon the conclusions of a previous lawful development certificate for a proposed use (ref: xx/xxxxx/)

#### Land in the Green Belt adjoining Bath

- 2.28 Strategic areas of land availability in the Green Belt surrounding Bath are limited to Sulis Manor/Odd Down (Hignett Family Trust) and West of Twerton (Duchy of Cornwall). There is also evidence of significant land availability from half a dozen land owners on the lower southern facing slopes at Weston.
- 2.29 A Development Options Concept Report (Arup, 2013) identifies the capacity of [Odd Down/Sulis Manor](#) as 750. This capacity area excludes Sulis Manor itself (3.0ha) and a land immediately to the east of Combe Hay Lane (3.0ha) from consideration as suitable areas for development. The Council considers that Sulis Manor is suitable for development although some of its mature vegetation may need to be retained. The land adjoining Combe Hay Lane forms part of an SSSI but appears to have degraded recently. It is not likely to be suitable for housing development re undermining and land stability.
- 2.30 A Development Options Concept Report in respect of the [Lower slopes at Weston](#) identifies that adjoining the current built up area there are four to five suitable areas that could be developed for housing and that these areas could yield about 500 houses. The suitable areas exclude areas of spring streams/drainage channels and an SSSI. Not all of the suitable areas are available for development as indicated within the SHLAA site assessments. That which is available could yield about 300 houses. Where land is suitable and available, further assessment is needed in respect of the achievement of highway access and the impact of development on PROW. One field (to the rear of Purlewent Drive) is particularly well used by people living in the area for recreation and forms an important link between Weston Park and Primrose Hill Community Woodland. A town and village green application has been made in respect of this area.
- 2.31 Whilst land at Sulis Manor/Odd Down and at Weston is suitable for housing, development would be harmful in respect of number of environmental considerations. However, the level of harm is not

considered to be so great as to render the sites (or large areas within them) unsuitable and scope for mitigation is high.

- 2.32 In respect of deliverability the housing trajectory assumes that some development in these two area will be forthcoming during the next 5 years, (120 at Odd Down and 70 at Weston).
- 2.33 The Development of 1500 homes promoted [West of Twerton](#) by the Duchy of Cornwall would cause substantial harm to the setting of the 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 somewhat dissociated from the urban fringe and connectivity across the Newton Brook valley cannot be achieved. A lower level of development would reduce the environmental impact but not achieve critical mass in respect of providing local services and extending bus routes. The SHLAA concludes that this area is not suitable for development.
- 2.34 The SHLAA 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. It has also not assessed the credentials of land south of Old Fosse Road on account of the steepness of the slopes and the presence of three ancient woodlands
- 2.35 Other small parcels of land have been promoted around Bath. Land behind Minster Way is regarded as being unsuitable in respect of WHS Setting impacts and half a dozen other parcels have yet to be fully assessed for their suitability but would likely yield up to 20-30 houses each. More investigation is still needed here.

#### Land within Keynsham

- 2.36 The SHLAA concludes that Keynsham, can deliver about 1,640 houses on suitable and available (or reasonably likely to become available) sites (that are not within the Green Belt) between 2011/12 and 2028/29.
- 2.37 Somerdale (700 dwellings) and Land at South West Keynsham (570) account for the vast majority of supply. Half of SW Keynsham is under construction and the other half (Council owned) is in the process of being disposed of. A hybrid planning application for Somerdale was submitted in April 2013. 270 units are applied for in detail, and 430 are applied for in outline. Limited potential has been identified for the intensification of suburban Keynsham, although there are some modest opportunities adjoining the High Street.

### Land in Green Belt adjoining Keynsham

- 2.38 Landowners and developers have promoted a significant amount of land in the Green Belt 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 (e.g. exclusion zones around gas infrastructure) and some areas are relatively stronger in respect of their sustainability credentials than others.
- 2.39 Four Development Concept Options Reports (Arup, 2013) explore the potential of the land around Keynsham. Broadly speaking it can be deduced that there at least 2,500 units worth of suitable supply and with an upper limit of 3,500 units if a greater level of landscape and visual harm is accepted.
- 2.40 To the [East of Keynsham](#), the Keynsham Saltford gap is a large of area suitable housing land. There are some constraints here such as the presence of a national high pressure gas main and community woodland. Further, the railway is a barrier to unlocking development to the north. The Arup Report looks at the capacity of the area to absorb the eastward growth of Keynsham as far as the exclusion zone around the HSE exclusion zone around the gas main. Broadly speaking this area can be sub-divided into three cells and the Arup Report identifies that:
- Area (c) south of the A4 could yield 750-950 dwellings
  - Area (b) between the A4 and the railway could yield up to 350 dwellings
  - Area (a) north of the railway could 650-830 dwellings
- 2.41 Area (b) is also partly identified a possible location for expansion of the Ashmead Industrial Estate. The utilisation of this option would reduce the areas potential capacity for housing.
- 2.42 In respect to of land availability, Mactaggart and Mikel are promoting the whole Keynsham –Saltford gap to the south of the railway line. It is important to note that they are promoting not only the land to the west of the gas main, but also the land to the east i.e. a westward expansion of Saltford. To the north of the railway land a single land owner is promoting a mixed use housing and marina development on the edge of Keynsham.
- 2.43 To the extreme south of the eastern finger of Keynsham at [Uplands](#) is also partly affected by the alignment of the gas main but the remainder of the area is suitable and available and could yield 400-500 dwellings.

- 2.44 To the extreme south of the western part of Keynsham (south of the existing Local Plan allocation K2) Bovis Homes have promoted a development of about 1,000 dwellings. The Concept Options Report for [South Keynsham](#) presents three options for the development of this area, at 770, 560 and 300 dwellings. Each greater level of development has progressively more impact re landscape sensitivity, visual aspects and highways impact.
- 2.45 To the [West of Keynsham](#) lies a potentially developable area sitting above Stockwood Vale. The most developable area is on the southern southern part of this plateau, although it is affected, in part, by the alignment of a gas pipeline. Since the publication of the Arup report the prospective developer has informed the Council that the alignment of the gas pipe is further west than previously supposed, meaning that a greater area is unencumbered by an exclusion zone and the housing potential is higher at c xxx dwellings.
- 2.46 The central / northern part of plateau to the west of Keynsham cannot be accessed from the existing highways network without securing 3<sup>rd</sup> 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.

Land in the Green Belt to the South East of Bristol

- 2.47 A number land parcels have been promoted as being available for development. These are focused on Hicks Gate (RPS and Key Properties) and Whitchurch (Taylor Wimpey, Robert Hitchens, Horesworld and others).
- 2.48 A further large SHLAA 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.
- 2.49 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 is unlikely to exceed 800 homes if existing uses are retained.



- 2.50 A Development Concept Options Report for [Hicks Gate](#) (for land within BANES) confirms that this area is suitable for development. This would be subject to development taking place alongside or following the Bristol contingency area. There are some topographical, hydrological and utilities related constraints but these are not absolute and would inform master planning rather than block development. The potential of the area (within BANES) is at least from 650 and rises to 1200 if a greater level of environmental impact and Green Belt intrusion is accepted. It is the impact on the Green Belt and the separation of Bristol, Keynsham and Bath that is a key issue here. The impact on the highways network is also an area of concern.
- 2.51 A Development Concept Options Report for [Whitchurch](#) confirms that the area is suitable for development. The setting of Maes Knoll (SAM) presents an absolute constraint that limits the southern extent of the area that is suitable for development. The availability or otherwise of all or part of HorseWorld is also a major influence on capacity. Green infrastructure and historic environmental assets (designated and undesignated) in respect of the immediate surroundings of Bristol and Whitchurch also present master planning constraints. The report concludes that if all the area is available for development then 3000 dwellings could be forthcoming. If HorseWorld is removed from the equation then the capacity of the area is unlikely to exceed 2,000.
- 2.52 HorseWorld are currently pursuing enabling development of 118 units on part of their site which the Council to secure the future of the charity in this location (13/02164/OUT). Should permission be granted the majority of the remainder of the HorseWorld site would not be available for development. Also in this area Robert Hitchins are appealing a decision to refuse a development of 285 dwellings between Whitchurch village and Stockwood (12/04597/OUT).

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

- 2.53 The SHLAA concludes that this area can deliver about 2,100 dwellings on suitable and available (or reasonably likely to become available) sites (within housing development boundaries or on sites with planning permission).
- 2.54 The supply is heavily influenced by the redevelopment of land in former industrial or railway use e.g. former Paulton Printing Factory (600), former Alcan factory, Westfield (170), the soon to be vacant Welton Bibby & Baron site (150), St Peters factory (115) and Radstock Railway Land (210). These opportunities are supplemented by greenfield Local plan allocations e.g. Cautletts Close, Midsomer Norton (95) and Wellow Lane, Peasedown (95).

- 2.55 A number more modest brownfield sites have come forward in the last few months related to the development programme of Cur. Elm Tree Inn (10), Bryants Avenue 14) and the Bakery Site in Radstock (14) are 100% affordable housing schemes totalling 38 units. This places downward pressure on the need to generate affordable housing from mixed tenure schemes. Normally a development of 125 homes would be needed to generate 38 affordable houses in the Somer Valley.
- 2.56 Much agricultural land has been put forward for development around Midsomer Norton, Radstock and Westfield. For many sites, development would result in a moderate to high landscape, visual or highways impact (i.e. resulting in low to moderate suitability credentials) but this does not necessarily mean they are not suitable for development (wholly or in part) if suitable master planning, mitigation and highways improvements can be achieved. Appendices 1di-iii set out the suitability credentials of each area that has been considered.
- 2.57 There are areas where development would cause too much harm in relation to the character and setting of each town and their Conservation Areas for it to be deemed suitable. Where this is the case a 'nil' suitability rating is given.
- 2.58 There is little evidence of availability on the periphery of Paulton. The redevelopment of the former Polestar factory will continue about 10 more years (based on the current rate of implementation) and so there is little justification for a further expansion of the village during this time. Peasedown has grown significantly as a commuter village to Bath. There remains a limited amount of available and suitable land between the Bath Road and Lower Peasedown. Elsewhere land is available to the south of the bypass. This is physically capable of accommodating development but the impact would be high and represent a breach of the contained nature of the village.
- 2.59 In short there is sufficient suitable land in the Somer Valley area that could be developed to supplement existing supply if needed. There is likely more suitable land than should be developed given the sustainability credentials of the Somer valley as a whole and the other options for development in the District in more sustainable locations.

#### Rural Areas

- 2.60 Much of Bath and North East Somerset is rural and comprises small to medium sized villages. During the previous BANES Local Plan period these villages made a significant contribution to housing land supply, particularly in respect of small windfall sites. These villages have also grown over time as a result of planned growth and the allocation of land for development. There is a mixed picture of land availability and suitability across the rural villages that is not easy to summarise. In short sufficient the

Assessment reveals that there are certainly options available to address NPPF: 54 and the requirement for LPAs to plan housing development to reflect local needs particularly for affordable housing.

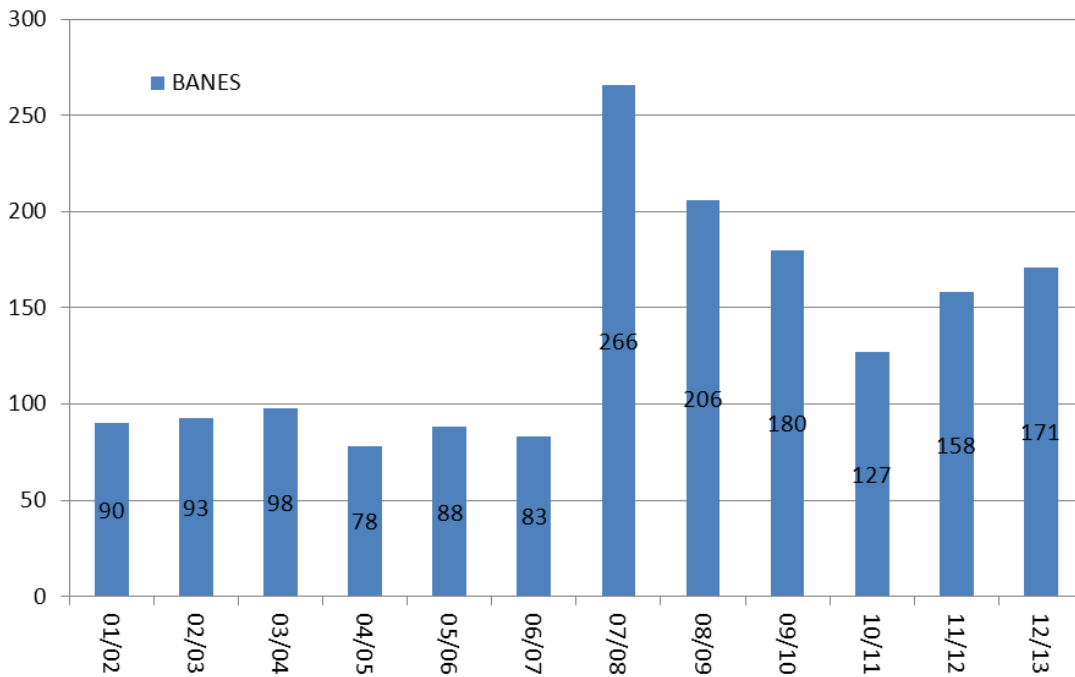
# Windfall Potential from Small Sites

## Evidencing an allowance for windfalls in the five-year supply (NPPF: 48) and beyond (ID/28: 2.5)

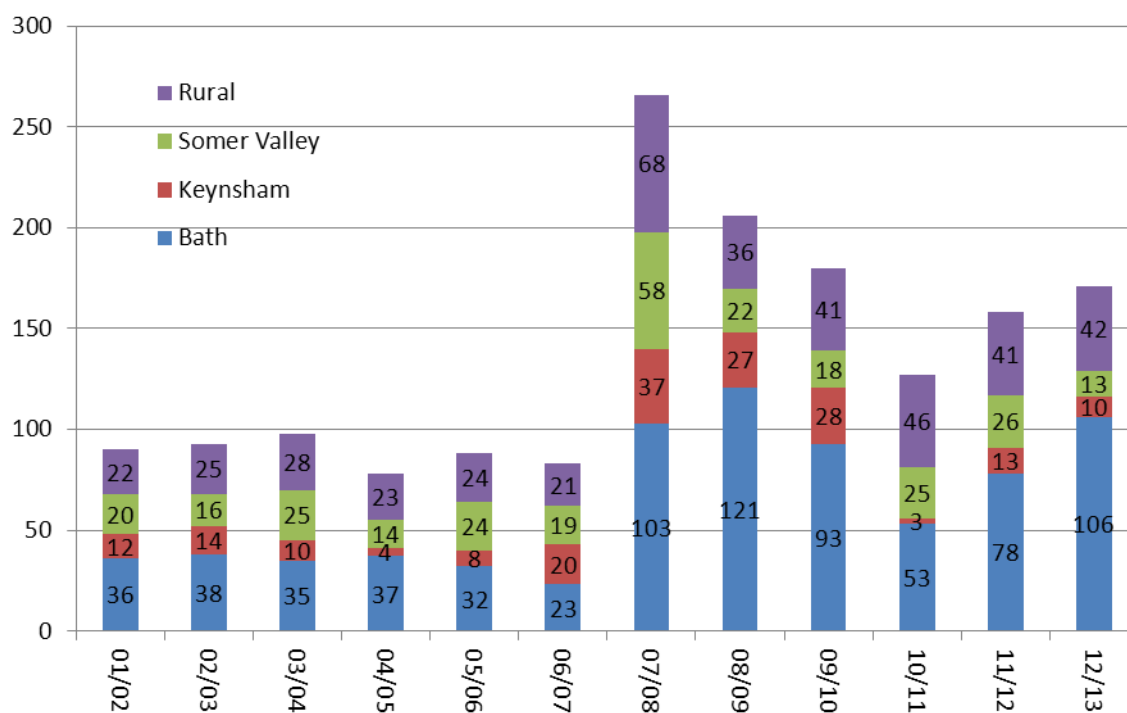
3.1 Small sites (below 10 units) have consistently contributed to housing development across BANES.

- Between 2001/02 and 12/13 (last 12 years) housing development on small sites contributed an average of **137 units a year**.
- Between 2001/02 and 2005/06 (first 6 years) the rate was lower and relatively stable at **90 units a year**
- Between 2006/07 and 2011/12 (last 6 years) the rate has been higher but more variable and has averaged **185 units a year**
- Bath has generally accounted for 46-50% of small site windfalls, Keynsham 11%, Somer Valley 15-17% and the rural areas 25%.

### Historic small windfall completions data –District-wide



### Historic small windfall completions data –Sub-District



### Long Term (01/02-12/13) Windfall Completions, Annual Average and Proportionate Split

	01/02-12/13	12 Year Average	Proportionate Split
Bath	755	63	46%
Keyn	186	16	11%
SomerV	280	23	17%
Rural	417	35	25%
<b>BANES</b>	<b>1638</b>	<b>137</b>	<b>100%</b>

### Short Term (07/08-12/13) Windfall Completions, Annual Average and Proportionate Split

	07/08-12/13	12 Year Average	Proportionate Split
Bath	554	92	50.0%
Keyn	118	20	10.5%
SomerV	162	27	14.6%
Rural	274	46	24.7%
<b>BANES</b>	<b>1108</b>	<b>185</b>	<b>100%</b>

- 3.2 Based on the past rate of delivery the Council considers that a delivery expectation from small sites of not less than 100 per annum is clearly justifiable whereas the most recent 5 year average might be optimistic given the downward trend during 07/08-12/13. However, using the eleven year average of rate 133 would not reflect the significantly higher delivery rates seen since 07/08. Given that the rate has been in excess of 150 a year for the last 5 of the last 6 years, this is deemed the most reliable windfall forecast until such time as a new trend emerges.
- 3.3 If this rate of delivery is projected forward for the 5 year supply period 2013/14 – 2017/18 it would yield 750 units from small sites. However, this results in double counting if sites with planning permission are not discounted.
- 3.4 At April 2013, the stock of small sites with planning permission was 448 and for the purposes of the SHLLA windfall allowance it is assumed that this number of units will be implemented within the next 5 years. Against this background the windfall allowance for the next 5 years from 2013/14 would be 302.
- 3.5 The analysis so far has not been adjusted in respect of the need to remove the greenfield windfall component (residential gardens, barn conversions and other previously undeveloped sites). Since 2006, 20% of small site completions have been on greenfield sites. On this basis, the unadjusted windfall allowance of 300 (for the first five years) should be adjusted to 240 (or 48 per annum).
- 3.6 For the purpose of preparing the housing delivery trajectory the Council has assumed that, geographically, these 240 units will come forward in line with the distribution seen in the last 6 years and the following apportionment arises.

	<b>Proportionate Share</b>	<b>Total</b>	<b>Per Annum</b>
Bath	50%	120	24
Keynsham	11%	25	5
SomerV	15%	35	7
Rural	24%	60	12
<b>BANES</b>	<b>100%</b>	<b>240</b>	<b>48</b>

**Allowance for windfalls and beyond the five-year supply (ID/28, 2.5)**

- 3.7 Projecting forward an unadjusted windfall allowance of 150 per annum for the remaining 11 years of the plan period from 2018/19 to 28/29 would result in a total of 1,650 units being delivered from

windfall. Once this figure is adjusted by 20% re the discount for greenfield development, this reduces to 1,320 units (120pa).

3.8 Again, for the purposes of preparing the housing delivery trajectory the Council has assumed that, geographically, these 1,320 units will come forward in line with their historic distribution (see 3.1).

	<b>Proportionate Share</b>	<b>Total</b>	<b>Per Annum</b>
Bath	50%	660	60
Keyn	11%	145	14
SomerV	15%	198	18
Rural	24%	316	29
<b>BANES</b>	<b>100%</b>	<b>1,320</b>	<b>120</b>

### **Windfall Allowance and Affordable Housing**

3.9 The Proposed Core Strategy policy for Affordable Housing in respect of small windfall sites is that sites of 5-9 units will be subject to an affordable housing requirement of 15-20% (subject to location in the district). There is no affordable housing requirement for sites of 1-4 units. The majority of windfall sites fall within the 1-4 units category. Of the 150 small windfall completions in 2011/12, 35 (23%) were on sites on 5-9 units. Applying a figure of 20% to the longer term windfall allowance of 1,200 = 240, which at 15-20%, could yield 36-48 affordable units. The yield will therefore be quite low. Consequently the SHLAA delivery trajectory (appendix 2) does not 'budget' for any affordable housing from small windfalls although they may be forthcoming in small numbers via planning decisions.

## Historic Performance against Local Plan Housing Target for 1996-2011

- 4.1 This section provides a short briefing of B&NES historic data in relation to housing policy and delivery. The Local Plan housing requirement for the period 1996-2011 was 6,855. Performance against this target at the end of the LP period is set out in Table 4.1.

**Table 4.1: Housing supply position in relation to Local Plan 1996-2011**

<b>Local Plan Target 1996/97-2010/11 (457 pa)</b>	<b>6,855</b>
Dwellings built 1996/97-2010/11 (380 pa)	5,688
Shortfall	1,167

- 4.2 Approximately 83% of the Local Plan target was achieved. The two largest sites allocated for residential development in the Local Plan, GDS.1/B1 'Bath Western Riverside' (450-600 units by 2011) and GDS.1/K2 'South West Keynsham' (500 units by 2011) units did not come forward as anticipated since its examination and adoption. This largely accounts for the forecast shortfall in delivery.
- 4.3 The housing trajectory on the following page sets out housing delivery performance over the lifetime of the Local Plan. It shows that performance during the first 3 years of the Local Plan period was good and enabled delivery to remain on track until about 2000/01. Thereafter delivery failed to keep up with the residual annual requirement. Since 1999/2000 annual delivery has only twice breached the 400 unit mark, in 2007/08 and 2009/10.
- 4.4 The Local Plan shortfall of 1,167 is to be added onto the forward looking housing requirement from 2011. It is assumed that had this been delivered then the Council would have sought to achieve about 35% of this figure as affordable housing. Therefore 400 units of the shortfall is affordable housing related.



## Performance against Core Strategy Target for 2011-2029, including 5 year supply position

5.1 Performance to date is set out in appendix 2 of the SHLAA. 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 and in which the 5 year requirement and supply position is set out. The position is set out for market, housing, affordable housing and for the aggregate housing requirement.

### Notes accompanying Appendix 2

5.2 The aggregate housing requirement of the proposed Core Strategy is 8,637, which is broken down in table 5.1. Note that the SHMA present figures for 20 years whereas the plan period is 18 years – hence the apparent discrepancy between what is being planned for against the time horizon of the SHMA

**Table 5.1**

	<b>LP Backlog</b>	<b>SHMA 'LowMig'</b>	<b>Total</b>
<b>Total</b>	1,167	7,470	8,637
<b>Market</b>	757	4,770	5,527
<b>Affordable</b>	410	2,700	3,110

5.3 The Core Strategy period will actually deliver close to 13,000 houses due to (1) overall commitments and (and the windfall allowances) already being in excess of 8,637 and (2) the need to boost the overall housing supply yet further to secure the totality of the need for 3,100 affordable homes. Table 5.2, shows that at June 2013 there is a surplus of market housing from SHLAA commitments but this stock and future flow does not yield the requisite number of affordable units. There is a shortfall of 519 affordable units.

**Table 5.2**

	<b>LP Backlog</b>	<b>SHMA 'LowMig'</b>	<b>Total</b>	<b>SHLAA Commitments @ June 2013</b>	<b>Surplus/ Deficit</b>
<b>Total</b>	1,167	7,470	8,637	11,166	+2529
<b>Market</b>	757	4,770	5,527	8,575	+3048
<b>Affordable</b>	410	2,700	3,110	2,591	-519

5.4 This is why the additional allocations shown in table 5.3 below have been made. The result of these allocations is 3,191 affordable units against a need for 3,100 units. the Council budgets for some development taking place on additional allocations with the next 5 years

**Table 5.3**

	<b>All</b>	<b>Market</b>	<b>Affordable</b>	<b>Next 5 Years (All)</b>
<b>Commitments</b>	<b>11,166</b>	<b>8,575</b>	<b>2,591</b>	<b>3836</b>
<b>New Allocations</b>	<b>1,748</b>	<b>1,148</b>	<b>600</b>	<b>622</b>
Weston	300	180	120	70
Odd Down	300	180	120	120
Lansdown	120	72	48	0
East Keynsham	250	175	75	70
South Keynsham	200	140	60	70
Somer Valley	*136	95	41	102
Ra.1	#122	86	36	75
Ra.2	120	80	40	45
Whitchurch	200	140	60	70
<b>Total</b>	<b>12,914</b>	<b>9,723</b>	<b>3,191</b>	<b>4,458</b>

\*300 less permissions already granted

#200 less permissions already granted or confirmed sources of supply

5.5 For 5 year supply purposes the Council will benchmark against the overall housing requirement of 8,637 shown in table 5.3. Appendix 2 shows the current and forecast 5 year supply position in respect of this figure and also for its market and affordable components. The position in respect of affordable housing is a material consideration but it is the overall aggregate housing figure that forms the basis of calculating the 5 year supply position.

5.6 The 5 year land supply calculation is based on the premise that the Local Plan backlog is dealt within the period 2011-2016 (i.e. the first five years after the end of the Local Plan period). Further any shortfall in delivery against the forward looking SHMA component of the housing requirement during the early years of the Core Strategy is not spread out over the entire remaining plan period, rather it is made up within the current 5 year block. Therefore the calculation assumes that housing delivery must keep up with the cumulative 'run rate'. This is commonly referred to as the 'Salford approach'.

5.7 As mentioned in the footnote to paragraph 1.4 of this report, the Council acknowledges that a 20% buffer currently needs to be added in respect of 5 year land supply. The reversion to a 5% buffer is forecast from 2016/17.

5.8 The Council is of the view that it currently has a 5 year supply +20% against its overall requirement of 8,637. Indeed it has 43% buffer overall. The Council's proposed housing policies have yet to be tested in examination and so little weight can be applied to these findings at the moment.

**Notes on impact of Interim 2011 based household projections (April 9<sup>th</sup> 2013)**

5.9 On 9<sup>th</sup> April 2013 CLG published new household projections for the period 2011-21. For BANES the figure is 4,400. This equates to dwellings projection of 4,532. To this figure must again be added the Local Plan shortfall of 1,167. The CLG based total is therefore 5,699 2011-21, a period which covers the next 5 years and beyond.

5.10 Whilst little weight can be given to the Proposed Core Strategy related position, Section 78 appeal inspectors may give greater weight to CLGs interim 2011-based household projections.

5.11 The CLG derived housing requirement to 2021 of 5,699 is a little higher than that based on the SHMA of 5,317. For the current 5 year supply period the following summary data is relevant to enable a comparison in respect of the impact on 5 year land supply.

	2011	2012	2013	2014	2015	2016	2017	11-17
SHMA Rate	415	415	415	415	415	415	415	2,905
CLG Rate	453	453	453	453	453	453	453	3,171
LP Backlog	233	233	233	233	233			1165
<b>SHMA+LP</b>	<b>648</b>	<b>648</b>	<b>648</b>	<b>648</b>	<b>648</b>	<b>415</b>	<b>415</b>	<b>4,070</b>
<b>CLG + LP</b>	<b>686</b>	<b>686</b>	<b>686</b>	<b>686</b>	<b>686</b>	<b>453</b>	<b>453</b>	<b>4,336</b>
Delivery	463	550						
5 year Requirements +20% buffer	SHMA+LP		4,070-1013 = 3,057 x 1.2 = 3,668					
	CLG +LP		4,336-1013 = 3,223 x 1.2 = 3,987					
Forecast Delivery			497	565	969	1,230	1,198	4,458
Actual buffers	SHMA+LP		<b>4458/3057= 45% buffer</b> Needed 3668, identified 4458 = 790 units in addition to required buffer of 20%					

	CLG +LP	<b>4458/3223 = 38% buffer</b> Needed 3987, identified 445 = 471 units in addition to required buffer of 20%
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- 5.12 Against the latest household projections the Council concludes that it still has a 5 year land supply +38%.
- 5.13 An important observation need to be made here. The CLG figure is derived from an ONS population projection that sees high growth in the later teens/ early 20s age group. For example, there are many more 20 year olds projected in 2021 than there are 10 year olds in 2011. Therefore, much of the growth in population of 20 year olds growth relates not to aging, but to the net migration of students into the area.
- 5.14 The CLG household projections are not 'smart' enough to recognise growth in the 18-23 age groups as a continuation of the growth of students. The CLG projections would therefore place them within households as non-student young adults using national headship rates for this age group. In reality these people will not require conventional housing as they will be housed in new on or off campus dedicated accommodation that Bath's universities and other providers are building to accommodate growth. In excess of 2000 bedspaces are likely to come forward.
- 5.15 The SHMA recognises these nuances and their impact. It therefore attempts to strip out any student related growth in households from its figures. In summary then, the CLG derived projection includes higher education students and place people of this age within household using standard headships rates for this group, whereas the Council's SHMA related housing requirement is net of students. The Council will be exploring this matter further with the authors of the Strategic Housing Market Assessment in the lead up to and during the Core Strategy examination.