

Bath and North East Somerset Local Plan

Strategic Housing Land Availability Assessment

Findings Report

(December 2014)



Strategic Housing Land Availability Assessment Findings Report

Contents

1. Introduction, NPPF Context and Approach
2. Key observations of the Assessment
3. Windfall assumptions for small sites (<10 units)
5. Historic Performance against previous Local Plan housing delivery target 1996-2011
4. Performance and projections against current Core Strategy housing delivery target 2011-2029

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
- Appendix 1d: Site assessments and plans for the Somer Valley
(i) Land within and adjoining Midsomer Norton & Westfield
(ii) Land within and adjoining Radstock
(iii) Land within and adjoining Paulton and Peasedown
- 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 Strategic Housing Land Availability Assessment (SHLAA) is a key component of the evidence base to inform the preparation and review Local Plan. The assessment is required by the National Planning Policy Framework (paragraph 159). The SHLAA 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 SHLAA and its preparation is given in the Planning Practice Guidance.
- 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 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 and competition 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 SHLAA itself. Appendix 2 sets out a trajectory 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 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 2014/15 a 20% buffer is applicable due a shortfall in housing delivery during the first three 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 three (2013/14) was 2,166 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 SHLAA, 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. The Council also makes an allowance for windfall beyond the next 5 years.

Purpose and caveats

- 1.10 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. SHLAA'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 SHLAA 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 SHLAA – 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 SHLAA and the Development Management view (although the SHLAA 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 SHLAA.

Methodology

- 1.15 The geographic scope of the SHLAA 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 SHLAA 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 Council's enabling role to pursue the most sustainable opportunities (as far as they are achievable).
- 1.17 Therefore, the SHLAA 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 do 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 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, capacity or deliverability of a site. The Development Management process or Place-making Plan with 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 SHLAA was tested at Core Strategy Examination in March 2014 and the Inspector Reported to the Council in June 2014 that “ *the SHLAA 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 SHLAA 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 SHLAA as 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 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 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 on the more strategic sites at the District’s principal urban areas, particularly where most complexity or uncertainty in respect of their suitability, achievability and timetable for delivery.
- 2.3 This SHLAA 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 Bat is to contribute 7,000 dwellings to the District-wide requirement of 13,000. It is estimated that the existing urban area of Bath can deliver about 5,700 dwellings on suitable and available (or reasonably likely to become available) specifically identified large sites between 2011/12 and 2028/29. Adding small sites, built or with planning permission (455) and a small sites windfall allowance (700) (see section 3) increases total supply to about 6,875. The housing supply figure for 'land within Bath' includes all sources aside from proposed Green Belt allocation at Odd Down (300). When this is added supply increases to 7,175

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

Western Riverside

2.6 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 – 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 site in December 2010 for up to 2,281 flats and townhouses ([06/01733/EOUT](#)). Figure 1 shows the masterplan for the site and strategic development phases (identified in yellow green, red and purple).

2.8 Also in December 2010 reserved matters were approved for the first phase of development, comprising 299 homes within buildings B3a, B4, B7, B8, B10, B10a and B10b ([06/04013/EFUL](#)). These buildings have been completed.

2.9 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 2.24). Construction of this site is in progress with the first completions set for the end of 2014/15.

- 2.10 In April 2013, reserved matters were approved for building B17 ([12/05387/ERES](#)). This is an affordable housing block of 55 apartments. This is under construction and will be completed during 2014/15.
- 2.11 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). These are under construction.
- 2.12 In January 2014, reserved matters were granted for blocks B6 and B12 for 38 townhouses ([13/04574/ERES](#)). These are under construction.
- 2.13 In April 2014, Crest submitted reserved matters planning applications for buildings B5 and B16 for 97 apartments ([14/02005/ERES](#)). These, together with building B27 (part of a later phase) occupy the most prominent riverside locations within the masterplan. This application is being determined.
- 2.14 A planning application will be submitted soon for block B10c which will yield 11 townhouses.
- 2.15 Crest expect to deliver the capacity identified in paragraphs 2.8-2.14 (786 dwellings) by October 2018. This capacity relates to the land that is currently in the control of Crest.
- 2.16 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 could not take place until the gasholders were decommissioned and the Wales and West 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 gasholder was completed in November 2014.
- 2.17 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.

2.18 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.

2.19 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.

2.20 The housing delivery trajectory from 2014-2019 (790 units) 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.

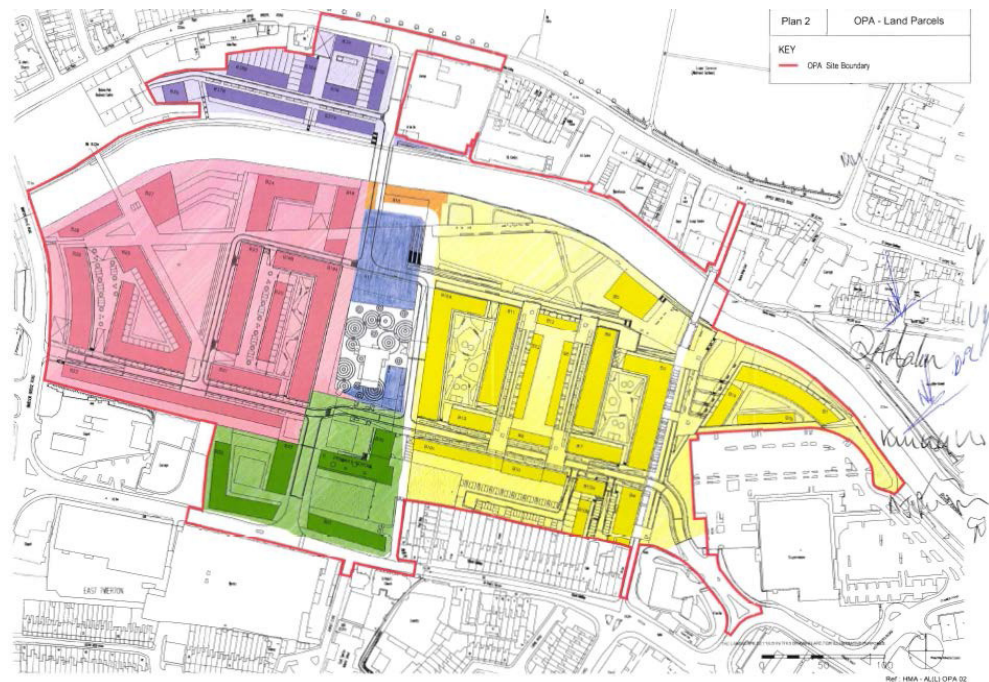
2.21 Planning condition 44, accompanying the outline application requires that not more than 1,250 units be occupied until a single form entry primary school is provided on the *green* land. The *green* land is currently occupied by car show rooms. It has not yet been secured but negotiations between Crest and the landowner are progressing. Given that the capacity of the yellow land is 790 it means that not more than about 460 units on the *red* land can be occupied until the school has been built. Using delivery as a proxy for occupation (and acknowledging that there is a time lag between delivery and sales) the 1,250th unit is programmed for delivery for the end of 2020/21. 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.

- 2.22 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 SHLAA housing trajectory (November 2014). The inclusion of delivery within the red land within the next 5 years within the housing trajectory is based on Crests current development programme.

- 2.23 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 preferred 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.

Figure 1, Western Riverside Masterplan & Strategic Phases



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

- 2.24 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. This has not been forthcoming. The withdrawn application proposed that the existing Sainsbury's store (King.6) relocate 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. 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 after 2021. 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.

2.25 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.

2.26 The Sainsbury's application area excluded the Help Hire 'gyratory' element of BWR East. This is currently in office use (partly vacant) with dedicated car parking (Wid.23c). It also excluded some dated commercial units on James Street West (King.6). However, these locations are also available for redevelopment.

2.27 The Pinesgate Gyratory site was promoted during the preparation of the Core Strategy for retail use and car parking. The eastern half of the site is now subject to an office redevelopment scheme (14/02619/FUL) achieving a significant net gain in floorspace. There may be role for the western half of the site here in respect of the future of Homebase but this requires further exploration. Again, the Placemaking Plan is now being prepared to assess the options 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.

2.28 Much of the James Street West frontage is now subject to a planning application 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

- 2.29 The final component of Western Riverside relates to that part of the allocation 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).
- 2.30 To the extreme west is the vacant Windsor Bridge Road site and Victoria Park Business Centre. 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 land supply at present as the future of the site might be contested.
- 2.31 There is also land allocated for residential-led redevelopment to the east that is currently in light industrial and sui generis use (rear of Argos, Comfortable Place, Omega Centre, Hinton Garage). In total this riverside strip could yield about 300 dwellings (most likely apartments). Only 15 units (King 13: Rear of Argos, [13/04217/OUT](#)) form part of the 5 year supply forecast. These are now deliverable given the decommissioning of the gas holder to the south.

Former MoD sites at Ensleigh, Foxhill and Warminster Road

- 2.32 In March 2013 the Defence Infrastructure Organisation (DIO) disposed its sites in Bath. To inform the sale of the sites the Council prepared Concept Statements to signal what it considered to be the optimum development mix in each location. These were non-statutory planning documents. Planning applications have since been permitted for all of Ensleigh and have been submitted for Warminster Road and Foxhill.
- 2.33 The capacity of the **Foxhill** site (now branded as Mullberry Park) is about 700 and has been purchased by Curo, the District's biggest social landlord. 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](#)). Alongside the redevelopment of the former MoD Curo have signalled that they intend to redevelop the existing and neighbouring Foxhill estate to the west. No net increase in dwellings is anticipated as part of the redevelopment of the existing Foxhill estate.

2.34 The construction programme for the development is anticipated to span about ten years and commence in Q4 2015, subject to gaining a reserved matters consent for phase 1 early in 2015. The following numbers/timings are indicative but have been provided by Curo. The first handovers of phase 1 are timetabled for early Summer 2016. The 277 dwellings in phase 1 will contribute to 5 year land supply in the period 2014/15 to 2018/19. At that rate of implementation phase 2 should take two years from 2019/20-2020/21. Curo have indicgtrd that phase 2 could deliver earlier, but for the time being a more conservative view is taken re 5 year housing land supply.

2.35

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

2.36 The capacity of **Ensleigh** was initially estimated by the Council to be about 350, but planning permissions granted total 290 dwellings.

2.37 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/planning permission to Kersfield Developments in October 2014. Since buting the site, Kersfield have applied to discharge a couple of the pre-commencement conditions.

2.38 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. A full application was submitted in April 2014 ([14/01853/EFUL](#)) for 253 units and approved in November 2014 (subject to S106). The SHLAA anticipates first completions towards the end of the 2015/16 monitoring year.

- 2.39 The **Royal High Playing Field** immediately adjoining Ensleigh 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 90, thus enabling 380 dwellings. IM properties have entered into an unconditional contract with the Royal High School to purchase the site. Royal High 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. Once secured, IM properties will transfer the site for the school to BANES Council who 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 90 units on the Royal High Land. The target date for the school to be open is September 2017.
- 2.40 The March 2014 housing trajectory did not include the Royal High School in the 5 year land supply the land had been marketed for sale at this time. But now, due to the preceding discussion it is now assessed as being deliverable, at least in part. IM properties will submit an outline application for this land in Spring 2015.
- 2.41 In May 2014 a planning application for 189 dwellings (since increased to 206 dwellings [\(14/02272/EFUL\)](#) was submitted at **Warminster Road**. This site has been acquired by a consortium comprising Square Bay, Firmstone and Edward Ware Homes. It is likely that a figure in the upper 100s can be achieved but the current application could well be recommended for refusal on a number of design related grounds. English Heritage currently object. The application was to be reported to December Planning Committee and a Committee Report has been published on the Councils website. However, the application will now be deferred to 2015. The SHLAA housing estimate is 175. The housing trajectory includes some delivery in the next 5 years but assumes refusal, appeal, dismissal and resubmission before permission is granted. Alternatively the Committee may not accept a recommendation to refuse or the applicant may choose to resubmit rather than appeal. The prospects for this site re 5 year housing land supply will be reviewed after the application has been taken to Development Control committee early in 2015.
- 2.42 Collectively the capacity of all three sites (including the extension to Ensleigh) is considered by the Council to be about 1,300.

City Centre

- 2.43 The SHLAA assumes that any development sites in the city centre that are to be allocated in the Placemaking Plan will be largely economic-development led but will include housing as part of the land use mix.
- 2.44 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 hundred 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.
- 2.45 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/EREG03](#)) was submitted in September 2014.

Twerton Riverside - Bath Press

- 2.46 The Bath Press site measures 2.2ha. A planning application ([12/01999EFUL](#)) for a large supermarket and associated office/create workspace was refused planning permission in January 2013 and this decision was upheld in December 2013 after the appeal was recovered by the SoS. Spenhill (a subsidiary of Tesco PLC) is now investigating a residential-led scheme. Pre-application advice was been sought in July 2014 (14/00009/PADEV) and an EIA scoping opinion request was submitted in December 2014 ([14/05607/SCOPE](#)). This proposes 267 dwellings and 1,400 sqm of employment space. The SHLAA estimate (based on a density multiplier approach) that the site could yield up to 200 dwellings as part of a residential-led scheme. This might be conservative it might be correct but it is of the right order of magnitude. The applicants detailed

design work within the assessed within the context of the statutory development management process will determine the outcome. The housing trajectory assumes that around half the capacity and that half of this would come forward in the five years from 2014/15.

Twerton Riverside - Roseberry Place & Unigate Dairy

2.47 This industrial area is now vacant and the site has been assembled by Deeley Freed. A pre-application process has been concluded its first phase in October 2014 (14/00010/PADEV) and a second phase will continue to the February 2015 when a planning application will be submitted. The target date for achieving permission and S1016 is July 2015. The SHLAA assumes a scheme of about 150 dwellings (the prep-app was for 200 dwellings) with about half the area earmarked for employment floorspace. Deeley Freed have highlighted the potential for this it to contribute to 5 year housing land. BANES Council is also involved in the project as a landowner

Twerton Park - Bath City FC

2.48 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.

Second tier strategic sites of about 50-100 Dwellings

2.49 These include:

- The former Lambridge Harvester Restaurant - 46 dwellings permitted ([10/04977/FUL](#)).
- The former Brougham Hayes Transport Depot - 44 dwellings permitted ([13/05404/FUL](#)).
- The former Royal High Girls School at Hope House - 57 dwellings permitted ([14/04184/FUL](#)), subject to S106.
- Hartwells Garage, Newbridge. A pre-application enquiry was made April 2013 (13/00004/PADEV) for the provision of 150 dwellings at the. The SHLAA assessment is a more conservative 80 based upon the conclusions of a previous Certificate of Appropriate Alternative Development (10/03384/CAAD) for a proposed use. An enabling application for a replacement garage facility at Peasedown St. John (13/03440/FUL) was permitted in December 2013.

- Rear of 89/123 Englishcombe Lane - 40 dwellings to the. This site is in Council ownership, is allocated for development in saved BANES Local Policy GDS.1/ and Property Services confirm there is an agreement to sell the land to a housing developer subject to planning permission being granted. Securing 3rd party land to secure suitable means of access has been an issue, but said developer has now achieved this.

2.50 The sites listed in 2.49 are considered to be suitable and deliverable within the next 5 years.

2.51 There are other sites of 10-40 units which are also deliverable and these are identified in the housing trajectory (appendix 2). These include buildings previously in office use where prior approval has been given for residential conversion re permitted development rights.

2.52 The final site requiring specific mention is the Royal United Hospital campus where land towards the north and south of the site is earmarked for disposal. These areas could accommodate about 100 dwellings between them, but not within the next 5 years.

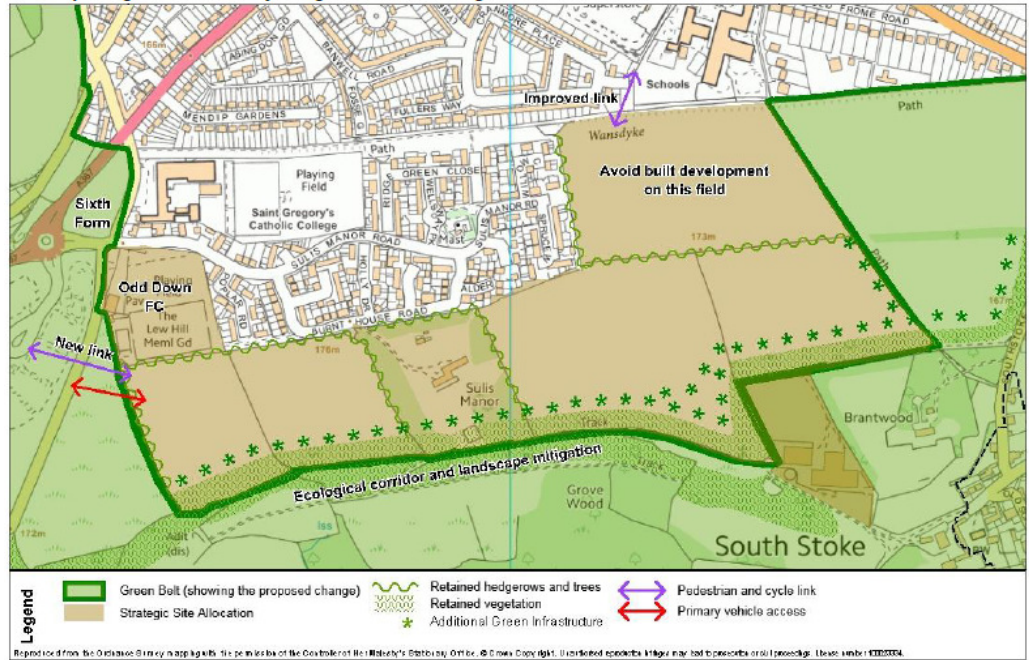
Land removed from the Green Belt at Odd Down /Sulis Manor (West)

2.53 The SHLAA 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, Cotswolds AONB, Wansdyke SAM, Bath WHS, South Stoke Conservation Area; and vehicular access. The outcome is the identification of a suitable development area on the western side of the plateau for 300 dwellings, 120 of which are deliverable in the next 5 years. A [Statement of Common Ground \(BNES/53C\)](#) was prepared with the landowner to inform the Core Strategy hearings (March /April 2014). This landowner set out a rather bullish estimate of first completions in Winter 2015, whereas the housing trajectory assumes that first completions will be in the final quarter of 2016/17.

2.54 Subsequent to the Inspector's Report and the adoption of the Core Strategy, in October 2014 Bloor Homes announced that they would be developing this site in partnership with the landowner, under the name Sulis Down. A masterplan for the site will be submitted to the Council in March 2015. This will be assessed by the Council's Development Team and, if it accords with the site principles in the Core Strategy it will be taken to Development Control Committee for endorsement. An planning application will follow

in July 2015, and if approved would enable a start on site in 2016. First completions are anticipated at the end of 2016/17 and delivery should be in full swing by 2017/18.

Sulis Down



Land in the Green Belt adjoining Bath

2.55 Strategic areas of land availability in the Green Belt surrounding Bath are focused on Sulis Manor/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)

2.56 See paragraphs 2.50. 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

2.57 The SHLAA 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

2.58 The development of 1,500-2,000 homes promoted [West of Twerton](#) by the Duchy of Cornwall 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. A lower level of development would reduce the environmental impact but not to the extent that the residual area is suitable and this would also 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.

Other Green Belt land around Bath

2.59 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. Neither has it 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.

2.60 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 as some potential or 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

- 2.61 The SHLAA concludes that land at Keynsham (including that removed from the Green Belt for immediate development) can deliver about 2,100 houses on suitable and available (or reasonably likely to become available) sites between 2011/12 and 2028/29. This mostly relates to the redevelopment of Somerdale and land removed from the Green Belt within the BANES Local Plan (2007) and within the Core Strategy (2014). Additional land is safeguarded for development which could yield a further 250 dwellings. This would increase to overall housing potential to 2,350 if it was developed after plan review.
- 2.62 Limited potential has been identified for the intensification of suburban Keynsham in respect of large sites, although the Council's former Riverside office complex and the former current station site has clear potential and there are some other modest opportunities adjoining the High Street. The Council owns the freehold to Riverside and vacated the premises in Autumn 2014 to take up a new purpose built facility next door. In August 2014 the Fire Service was granted permission for a replacement station to the west of Keynsham on the Hicks Gate roundabout (14/01849/FUL). In October 2013 pre-application enquiry was made for 70-120 apartments and 2,000 sqm of office space (13/00020/PADEV).

Somerdale

- 2.63 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 have been permitted in full, and 415 in outline. Construction commenced in 2014 and 26 dwellings should be completed in year 1 (2014/15). The planning application file contains a [build sequence plan](#) (dated October 2013 and submitted in March 2014) showing an 8 year implementation programme. Activity to date suggests that this remains valid assumption.
- 2.64 In August 2014 it was announced that Taylor Wimpey had sold part of the site (the iconic three large red brick former factory buildings) to MF Freeman. A planning application is imminent; following a public exhibition on December 1st 2014. The scheme is designed to achieve 41 more dwellings and 45 more C2 rooms than enabled by the outline layout. The additional capacity achieved on this part of the site (if permitted will not be at the expense of capacity elsewhere. If/once permitted this would increase the

dwelling yield to 723. It should also enable swifter implementation as two developers would be involved.

	Outline PP	MF Freeman Scheme	Difference
Block A	113 dwellings	95 dwellings	-19 dwellings
Block B	Partly retained Office 5k sqm	Fully retained 105 C2 (bedrooms) and 30 C3 (dwellings)	+30 dwellings +105 C2 bedspaces - 5k office
Block C	Partly retained Office 5k sqm	Fully retained Office 11K sqm	+5k office
Care Home Land	60 care home bedspaces	30 dwellings	+ 30 dwellings - 60 C2 (bedrooms)

South West Keynsham (K2)

2.65 The 'GDS.1/K2' allocation of the BANES Local Plan is formed of two sections, east and west. The western section of the BANES is being developed by Taylor Wimpey for 285 dwellings ([09/04351/FUL](#)) and first completions were recorded during 2013/14.

2.66 The eastern section of this allocation is being developed by Barratt and a planning application was submitted in January 2014 for 267 dwellings ([14/00049/FUL](#)). There is delegated authority to permit this application subject to the completion of S106 agreement. This should be signed very early in 2015 as there are no particularly complex matters to address, enabling commencement soon after and first completions towards the end of 2015/16. 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](#) (dated 27th Oct 2014).

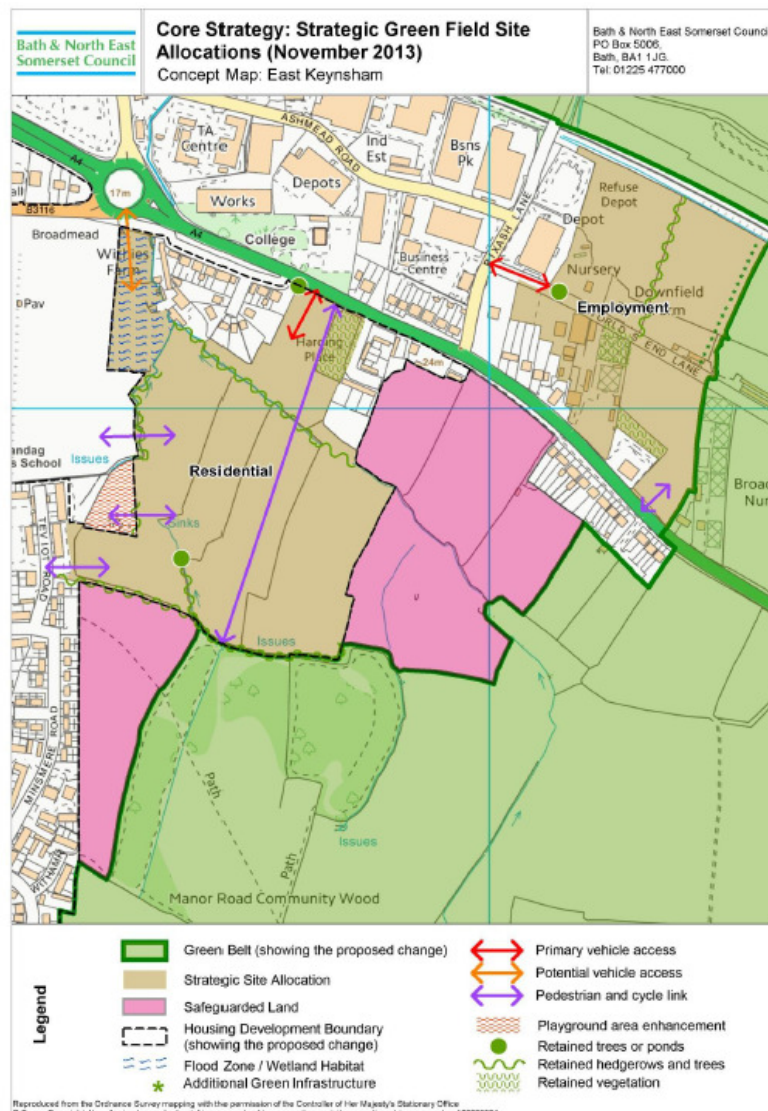
Land removed from the Green Belt at Keynsham

2.67 The Core Strategy removes land from the Green Belt in two locations. To the 'East of Keynsham', beyond the grounds of Wellsway School, Mactaggert and Mickel (M&M) will develop upto 250 dwellings. Further, to the south (Taylor Wimpey) and east (M&M) two additional areas are safeguarded for future development and these areas could yield about another 250 dwellings. Paragraphs 194-208 of the Core Strategy Inspector's Report set out why this area is suitable. The first pre-application meeting has taken place between the developer and the LPA.

2.68 Requests 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.

2.69 The development management process will 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. It is estimated that this process will take until April 2016, with first completions towards the end of 2016/17. This timetable reflects 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.

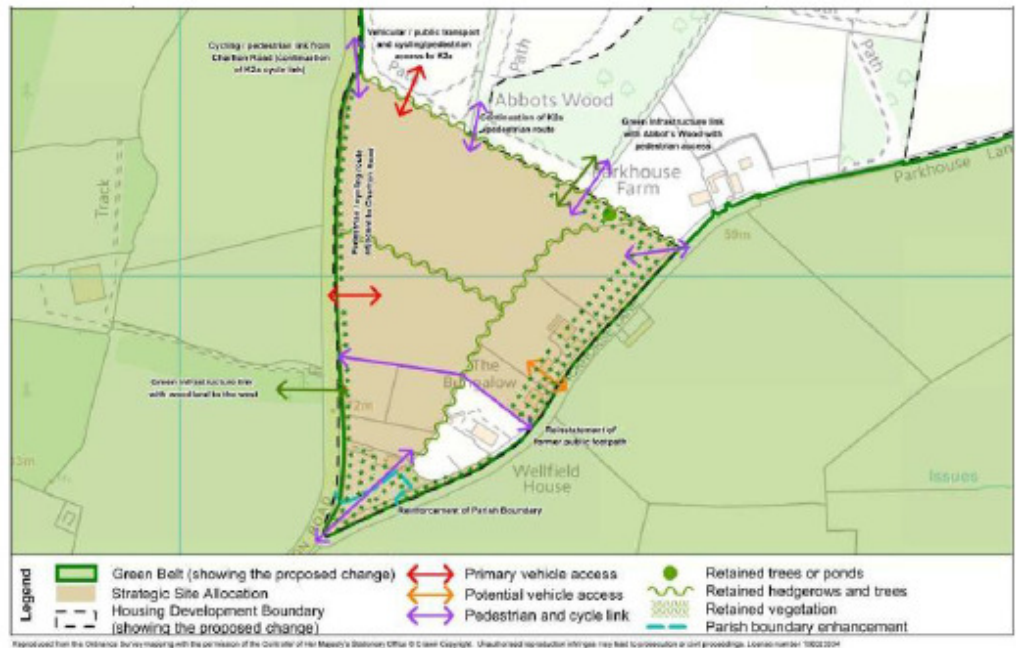
East Keynsham



2.70

To the south of the eastern section of 'K2'. Bloor and Persimmon are to develop up to 200 dwellings. Paragraphs 209-217 of the Inspector's Report set out why this area is suitable. The development management timetable is the same as for the East of Keynsham allocation. The housing trajectory reflects paragraphs 3.3 to 3.5 of a [Statement of Common Ground \(ref BNES53/I\)](#) prepared between the Council and the developer in February 2014 to inform the Core Strategy hearings. The Council's housing trajectory is slightly more conservative (130) than Bloor's estimate (180).

South Keynsham



Land in the Green Belt adjoining Keynsham

2.71 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), the Chew Valley which divides Keynsham into its eastern western parts, 'The Hams' within the bend of the River Avon, and Stockwood Vale. Where land is suitable, some areas are relatively stronger in respect of their sustainability credentials than others.

East of Keynsham

2.72 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 regarded as 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.

2.73 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.

2.74 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 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 understood to be available. The northern periphery of this general location constrained due to flood risk from the River Avon and is not suitable.

- 2.75 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).

Uplands

- 2.76 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 and available and could yield upto **500 dwellings**, although this needs refining as the suitable area is refined.

South Keynsham

- 2.77 To the extreme south of the western part of Keynsham (south of existing Local Plan allocation K2) Bloor Homes have promoted an urban extension of about 1,000 dwellings largely between Parkhouse lane and Redlynch Lane. This includes the land now allocated in the Core Strategy for 200 dwellings and so the net figure is reduced to about 800. Parkhouse Lane (and Charlton Road to the west) creates new logical long Green Belt boundaries in 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.
- 2.78 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.

- 2.79 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 shows a plan for 734 homes (excluding the now allocated Cells H1 and H2).The Council considers that the harm caused by such development, in an isolated location, would significantly and demonstrably outweigh the benefits.

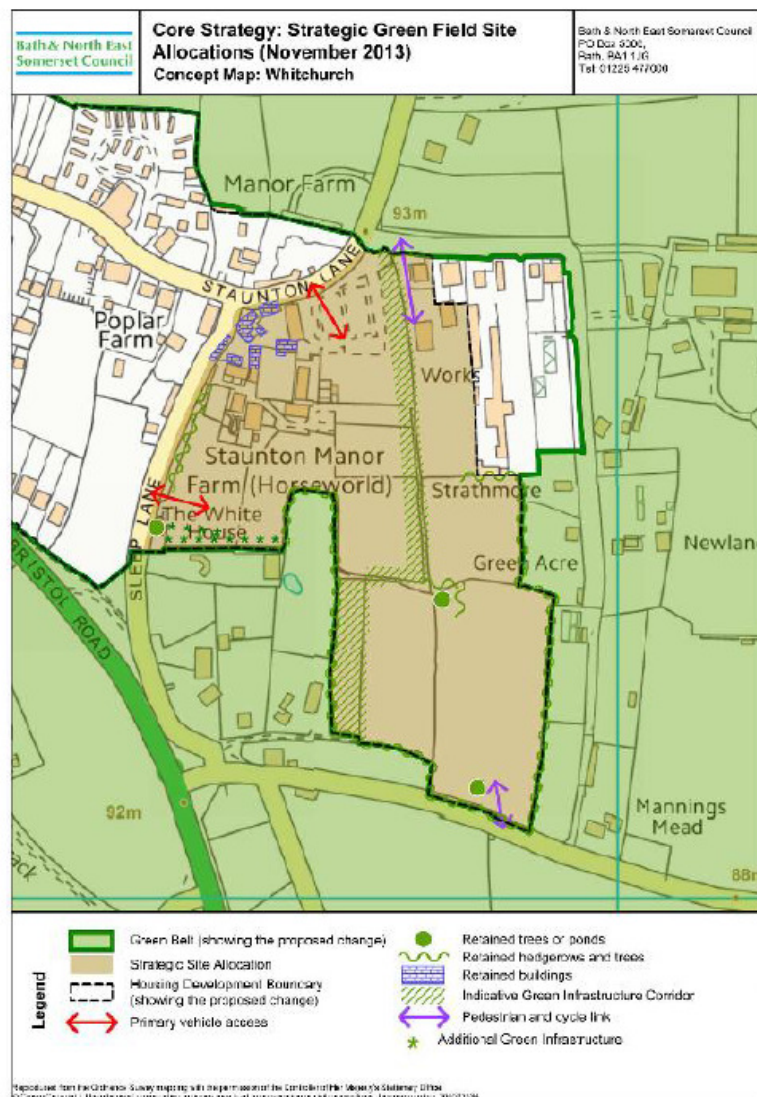
West of Keynsham

- 2.80 To the [West of Keynsham](#) lies a potentially developable area sitting above Stockwood Vale. The land to the south of Lays farm Industrial Estate is the 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.
- 2.81 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**.
- 2.82 The central / northern part of plateau to the west of Keynsham cannot be accessed from the existing highways network 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.

Land removed from the Green Belt at Whitchurch

2.83 The Core Strategy removed land from the Green Belt to east of Sleep Lane and north of Queen Charlton Lane at Whitchurch. Policy RA5 seeks residential development of at least 200 at 35-40dph. The area is in four ownerships and covers around 8ha.

Sleep Lane, Whitchurch



2.84 The largest part of the area (around Staunton Manor Farm) is owned by Horseworld (c.4ha) and this land is being marketed for sale. The agent (Savills) has confirmed that all bids have been received and that an announcement on the developer could be made before Christmas 2014, or if not, soon after. Prior to the adoption of the Core Strategy

Horseworld sought planning permission for 124 dwellings on this area ([13/02164/OUT](#)). This was refused in December 2013 on Green Belt reasons. The design of the scheme was acceptable in-principle and the indicative layout enabled vehicular connections with land the east and south.

2.85 Elsewhere within the housing allocation and to the SE of the Horseworld land, Barratt Homes has sought pre-application advice (August 2014) about achieving access to the 1.6ha paddock that abuts Queen Charlton Lane. This could accommodate 50-60 dwellings at 35-40 dph. However, this should not occur independently of the Horesworld land as a separate vehicular access from Queen Charlton Lane has been rejected in the Council's pre-app response (October 2014). Barratt will need to work with the developer of the Horseworld land and the intervening land to agree a comprehensive site layout. The buyer of the Horeseworld land may well turn out to be Barratt, who are already developing to the west of Sleep Lane.

2.86 Two intervening paddocks to the north and west (1.37ha) separate the Barrat land from rom the Horseworld land, are also available and the landowner (Gregory) entered into a SoCG with the Council as part of the preparation of the Core Strategy to confirm this.

2.87 The works/haulage yard on the north east periphery of the allocation is not immediately available for development but is developable.

Green Belt adjoining South East Bristol

- 2.88 A number land parcels have been promoted as being available for development. These are focused on Whitchurch (Taylor Wimpey, Bovis, Robert Hitchins and others) and Hicks Gate (RPS and Key Properties) and W.
- 2.89 A further 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 harm.

Bristol City Council's Core Strategy

- 2.90 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.

Whitchurch

- 2.91 A Development Concept Options Report for [Whitchurch](#) 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 constraints. The report concludes that if all the area is available for development then 3,000 dwellings could be forthcoming. If Horseworld (less the land already removed from the Green Belt) is removed from the developable area then the capacity is unlikely to exceed 2,000. Significantly less than this is currently deliverable in the absence of major highways improvements. Barton Willmore (acting for Taylor Wimpey and Bovis) suggest a first phase of 600 could come forward without such improvements.

2.92 Also in this area Robert Hitchins have 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.

Hicks Gate

2.93 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 prevent development. The potential of the area (within BANES) is at least 650 and rises to 1,200 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 along the A4 corridor that 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.

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

Land within existing HDBs

2.94 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. This figure includes 233 units on small windfall sites. Further details are set out below.

Large previously developed sites built or with planning permission

2.95 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 will complete the first phase during 2015/16. Further reserved matters application will follow to enable full completion.

2.96 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 will follow in 2014/15.

2.97 The former **Polestar Purnell Printing Factory** at Paulton is the largest development site in the Somer Valley. The first development area (Barratt) delivered 161 homes, although only 41 built after 2011 count towards current plan period delivery.

2.98 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:

- Phase 1a (11/00800/RES – 38 units) complete
- Phase 1b (11/03783/RES – 38 units) complete
- Phase 2a (13/03177/ERES - 82 units) under construction
- Phase 2b (13/03548/ERES – 86 units) not started

2.99 The remainder of the outline consent can deliver 222 units and reserved planning applications will be submitted when Bovis is ready to move onto subsequent phases. In addition to Phases 2a and 2b a further 57 dwellings a deliverable within n the next 5 years.

2.100 A number of smaller brownfield sites (yet over 10 dwellings) supplement the supply of housing land with planning permission by 161 units. These are identified the housing trajectory and include:

- **Elm Tree Inn** (10), **Bryants Avenue** (14), **Old Bakery, Waterloo Road** (14) which are 100% affordable housing schemes.
- **Paulton House, Old Mills** (58), where the owner has exercised permitted development rights in respect of B1–C3.
- **Hazel Terrace** (24) 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. They further state that they will focusing on a couple of other sites (outside BANES) first, but that Hazel Terrace is deliverable by 2018/19.
- **St Peters Park** (14, Oval Estates)
- **Old Pitt Yard**, Clandown, where outline permission was previously granted for 31 dwellings but where there is currently an application pending consideration for 53 dwellings.

Greenfield sites built or with planning permission

2.101 **Wellow Lane**, Peasdown St John ([08/03263/FUL](#)- 95 units) has been completed and **Cautletts Close**, Midsomer Norton ([10/04015/FUL](#)- 112 units) is part complete, part under construction. These sites were allocations of the BANES Local Plan (2007).

2.102 During 2014 four further greenfield sites were permitted before the Core Strategy was adopted (a time when the LPA could not demonstrate a 5 year supply of deliverable sites), totalling 442 dwellings.

- **Monger Lane** ([12/04590/OUT](#)), MSN.28, 135 units, Taylor Wimpey. A reserved matter application will be submitted before 31st December 2014.
- **Land at Fosseyway South** ([13/00127/OUT](#)), MSN.31a, Strategic Land Partnerships. Since sold to Barratt. Reserved matters submitted ([14/04032/RES](#)).

- **Knobsbury Lane** ([13/01709/OUT](#)), Rad.27, 53 units, Ammerdown Estate, since sold to Persimmon. Reserved matters submitted ([14/04499/RES](#)).
- **Greenlands**, Peasedown St John ([12/05477/OUT](#)), where Edward Ware Homes were granted 89 units at appeal prior to adoption of the Core Strategy. No reserved matters application yet.

Large previously developed SHLAA sites without planning permission

- 2.103 **Welton Bibby and Baron** vacated their factory in Midsomer Norton in 2013 to relocate to Westbury. The SHLAA estimates that a housing-led redevelopment, along the lines of the approach/density taken in respect of the former Alcan factory would yield 150 dwellings. A major housing developer is known to be making an approach to buy the site. Previous interest from Asda has cooled. This is partly linked to the availability of the South Road Car Park (BANES Council owned) adjoining the town centre interest from Aldi.
- 2.104 Elsewhere Oval Estates has submitted a planning application for the land to the **rear of the St Peters Factory** for 91 dwellings ([14/04003/OUT](#)). The SHLAA estimate of potential is 70. **Norton Radstock College** has indicated that some of its land is surplus to requirements and could accommodate around 50 units. Pre-application advice was sought from Curo in July 2014 (14/03262/PREAPP). The full range of other brownfield SHLAA sites is set out in appendix 2.

Greenfield SHLAA sites

- 2.105 In addition to the sites recently granted planning permission (see paragraph 2.102) a number of other greenfield sites have been put forward for development in the Somer Valley Policy area. None of these site 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.

Greenfield SHLAA sites of recent and immediate interest

- 2.106 Of recent and immediate interest are the following nine sites, five of which have been put forward by Edward Ware Homes.
- **Land north of Fosseyway Gardens, Westfield**, where Radstock Land LP was refused planning permission for 92 dwellings in June 2013 ([13/00583/OUT](#)). This decision was appealed and the hearing took place during w/c March 18th 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.

- **Boxburry Hill, Midsomer Norton**, where Edward Ware Homes were refused planning permission for 124 dwellings in February 2014 ([13/04880/OUT](#)). An appeal has been submitted and will be heard in January 2015.
- **Grove Wood Road, Haydon, Radstock**, 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.
- **Land West of Northmead Road, Midsomer Norton**, where a planning application ([14/00672/OUT](#)) was submitted by Edward Ware Homes in February 2014 for 44 dwellings and refused in August 2014.
- **Thicketmead Farm, Midsomer Norton**, where a planning application ([14/00685/OUT](#)) was submitted by Edward Ware Homes in February 2014 for 72 dwellings and refused in August 2014.
- **West of Wheelers Road**, where a planning application ([14/00649/OUT](#)) was submitted by Flower & Hayes in February 2014 for 35 dwellings. This is still being determined.
- **Parcel 5922, Farrington Road, Paulton**, where Edward Ware homes were refused planning permission for 47 dwellings in January 2014 ([13/03547/OUT](#)). The decision notice refers to a lack of a local primary education places in Paulton as the reason for refusal.
- **Somerset Inn, Bath Road, Paulton**, 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.
- **Parcel 0069, Church Road, Peasedown St John**, where Edward Ware Homes was refused planning permission for 55 dwellings ([14/02547/OUT](#)) in September 2014.

Other Greenfield SHLAA sites at Radstock & Haydon

Other undeveloped land within Radstock Conservation Area

- 2.107 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.
- 2.108 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 SHLAA 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.
- 2.109 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.
- 2.110 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

2.111 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

2.112 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.

Tyning Batch/Lower Whitelands

- 2.113 The SHLAA does not regard the Tyning 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 Tyning 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.
- 2.114 The spoil heap to the south of Tyning Hill Road is open in part, although sloping. It is unlikely to be developable on account of ground conditions, meaning that if there was to be development on the reclaimed part of the site (to the north of Tyning 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 Farm), might also be might unlock RAD.19 from a highways perspective. Currently, all traffic would have to utilise a modified Tyning Hill. This might technically be possible, but the impact 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

- 2.115 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.

- 2.116 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.
- 2.117 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

- 2.118 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).
- 2.119 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 SHLAA sites at Midsomer Norton / Westfield

Welton Vale

- 2.120 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.
- 2.121 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 SHLAA 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)

- 2.122 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)

- 2.123 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

- 2.124 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

- 2.125 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)

- 2.126 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 SHLAA 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 SHLAA sites at Paulton

- 2.127 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 capacity is a major barrier to additional permission being granted.

Other Greenfield SHLAA sites at Peasedown St John

- 2.128 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.
- 2.129 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.
- 2.130 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

- 2.131 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 development, within the housing development boundary. The Core Strategy apportions 1,100 dwellings (about 60 per annum) to the rural areas over the plan period 2011-29.
- 2.132 Within the rural spatial strategy for development villages are categorised based on the 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 identifies that villages will need to identify large sites (of 10+ units) to accommodate around 50 units (most 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.
- 2.133 There is a mixed picture of land availability and suitability across the rural village that is not easy to summarise. In short the Assessment reveals that there are options available to deliver 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.
- 2.134 A number of parish councils are undertaking neighbouring plans to identify sites. The Placemaking Plan is also in preparation to do the same. This is at Options stage. Suitable sites have been and could still be permitted prior to the adoption of the Placemaking Plan.

RA.1 Villages outside the Green Belt

- 2.135 Bishop Sutton, Clutton, High Littleton, Farrington Gurney, Temple Cloud, and Timsbury currently meet the sustainability criteria required of RA.1 villages.

Bishop Sutton

- 2.136 Bishop Sutton has received its 'quota' of dwellings on large sites at:

- Stitching's Shord Lane, where Charles Church are building 35 dwellings ([14/00544/RES](#))
- Wick Road, where Barratt are building 41 dwellings ([12/05279/FUL](#)). This application was granted at appeal.

2.137 These sites yield 76 dwellings and are both under construction. A planning application to extend the Stitching's Shord Lane site by 32 dwellings ([13/04975/OUT](#)) was refused in March 2014 and is being appealed.

Clutton

- 2.138 Clutton has also received its 'quota' of dwellings on large sites
- In July 2013, Curo was granted planning permission for 36 dwellings at appeal at Maynard Terrace ([12/01882/OUT](#)). An application for reserved matters has not yet been received.
 - 15 dwellings have also been permitted (subject to S106) at 'The Wharf' ([12/00293/FUL](#)).
 - Both sites are considered to be deliverable

2.139 In the immediate vicinity of the permitted Maynard Terrace site two further applications ([14/00039/OUT](#) and [14/00041/OUT](#)) were submitted in January 2014 (by Edward Ware Homes) for 36 and 37 dwellings. Both of these were refused in April 2014. Six months have passed and no appeals have been lodged.

2.140 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. No appeal was lodged.

High Littleton

2.141 No suitable site has been identified at High Littleton either within or outside the Green Belt. However, there is evidence of land availability, both current (outside the GB) and historic (within the GB). A 50 dwelling contribution is not expected of High Littleton towards meeting the overall rural housing requirement.

2.142 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 site has never been submitted to the SHLAA by the land owner/

developer agent. Though the SHLAA 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.

Farrington Gurney

2.143 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 but suitable areas have been identified and investigations are on-going. The Duchy of Cornwall is a major land owner in this area. There are suitable sites, the issue of achieving development relates to land availability, the capacity of the primary school to take more children, and the inability of the school to expand within its current site. The Placemaking Plan will attempt to overcome these issues. The contribution required Farrington Gurney does not form part of 5 year housing land supply.

Temple Cloud

2.144 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. Even if the appeal is dismissed (which is unlikely) a smaller scheme of nearer 50 dwellings would almost certainly be submitted, which would not be objectionable. The Placemaking Plan Option consultation sets out a preferred strategy of achieving 50 dwellings either side of Temple Inn Land rather than wholly on one side. The traffic impact on the A37 junction of a split development would be the same as for a single development. Landscape impact was not a reason for refusal on the land to the south.

Timsbury

2.145 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 201). The first relates to a former concrete batching site. In 2009 Flower and Hayes submitted an application for 27 dwellings here 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 therio

reader for development within the 5 years. The Placemaking Plan identifies a preferred greenfield site to make up a further 25 dwellings, and this site is back by the Parish Council.

RA.1 Villages surrounded by Green Belt

- 2.146 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 Whitechurch. 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).
- 2.147 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](#)).
- 2.148 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 Salford. At Manor Road Salford Crest was refused planning permission was refused 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

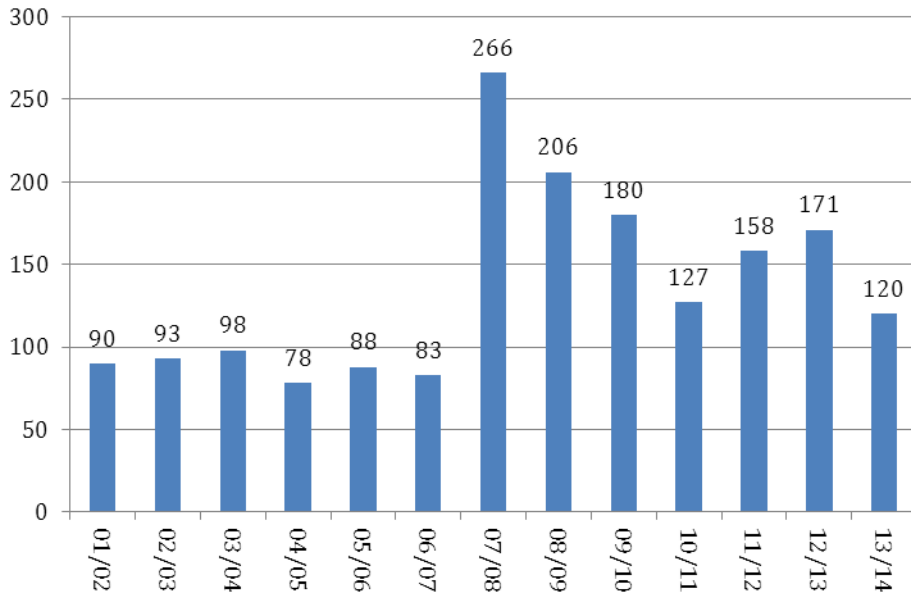
RA.2 Villages

- 2.149 The Placemaking Plan is currently in the process of identifying sites for a very modest amount of development at RA.2 villages. The options consultation identifies sites for 70 units. Not all RA.2 villages have had a site identified (re lack of suitability e.g. Camerton) and in some case where sites have been identified they yield less than 10-15 units. It is quick likely that at least some of this supply is deliverable within the next 5 years.

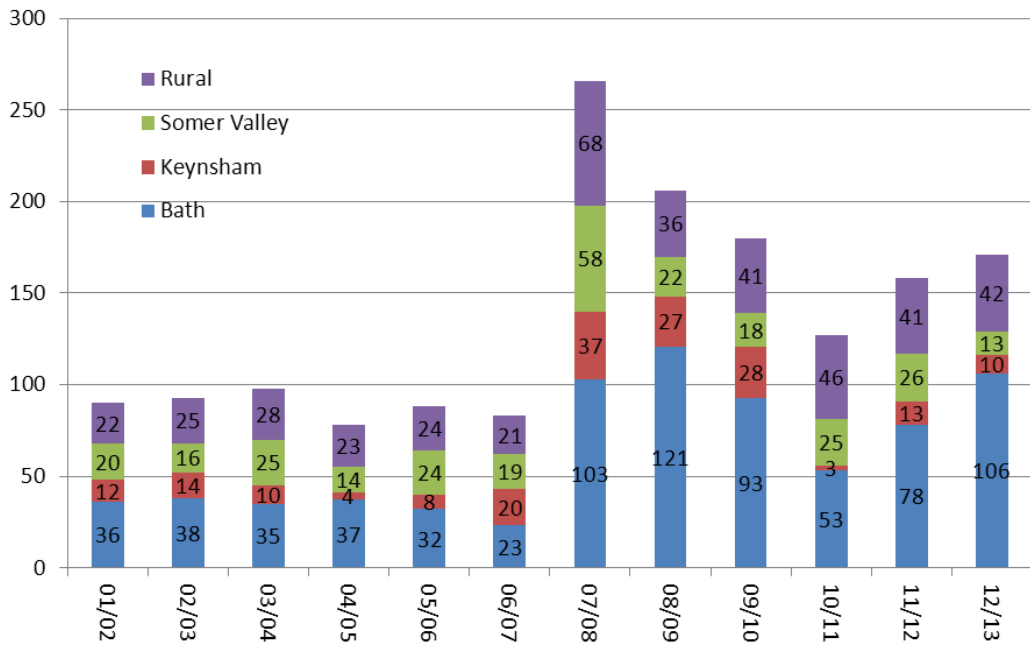
Windfall potential from small sites & broad locations

- 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 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 here. The NPPG also advises that a windfall allowance for broad geographical location can also be made for the medium to longer term.
- 3.2 The Council's windfall allowance is based on completions (not permissions). It assesses the likely rate of small site completions against the existing stock of permissions. The windfall allowance is essentially the difference between two.
- 3.3 Small sites (under 10 units) have consistently contributed to housing development across BANES. The data overleaf shows that:
- Between 2001/02 and 13/14 (last 13 years) housing development on small sites contributed an average of **135 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 7 years) the rate has been higher but more variable and has averaged **175 units a year**
 - The Council bases its windfall allowance on the 5 year rolling average which is **150 units per year**
 - During the last 5 years Bath accounted for 52% of small site windfalls, Keynsham 8%, Somer Valley 13% and the rural areas 27%.

Historic small windfall completions data for BANES



Historic small windfall completions data by broad location



- 3.4 Based on past rates of delivery the Council considers that an allowance from small sites of at least 100 per annum is clearly justifiable as a minimum whereas the most recent 5 year average might be optimistic given the downward trend within the period 07/08-12/13, although rates have bounced last two years. Simply using the eleven year average of rate 133 would not reflect the significantly higher delivery rates seen since 07/08.
- 3.5 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, at which point the allowance can be revisited.
- 3.6 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.
- 3.7 At April 2013, the stock of small sites with planning permission was 448 and for the purposes of the 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.
- 3.8 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) is adjusted to 240 (or 48 per annum).
- 3.9 For the purpose of preparing the housing delivery trajectory the Council estimates that, geographically, these 240 units will come forward in line with the distribution of small site completions seen in the last 6 years, resulting in the following distribution.

	Share	Total	Per Annum
Bath	50%	120	24
Keynsham	11%	25	5
Somer valley	15%	35	7
Rural	24%	60	12
BANES	100%	240	48

Allowance for unidentified small sites and beyond the five-year supply

3.10 Projecting forward an unadjusted allowance of 150 per annum for the remaining 11 years of the plan period (2018/19 to 28/29) would result in a total of 1,650 units being delivered from across BANES. Once this figure is adjusted by 20% re the discount for greenfield development, this reduces to 1,320 units (120pa).

3.11 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 re the broad locations of past delivery (see 3.1).

	Share	Total	Per Annum
Bath	50%	660	60
Keyn	11%	145	14
Somer Valley	15%	198	18
Rural	24%	316	29
BANES	100%	1,320	120

Windfall Allowance and Affordable Housing

3.12 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.

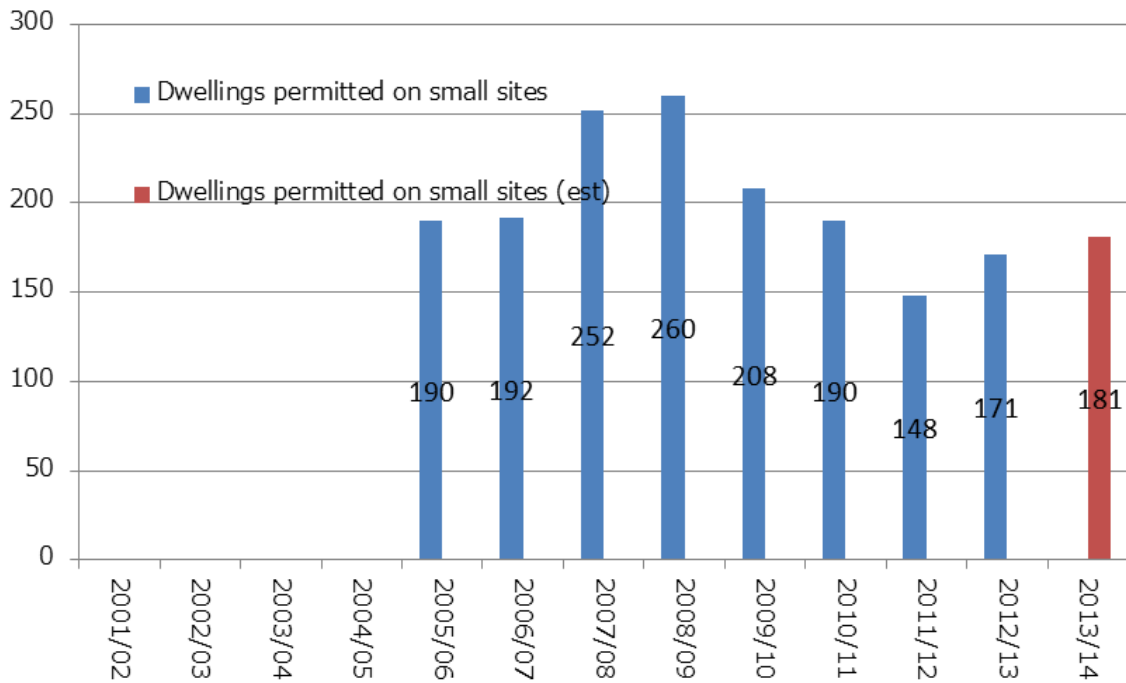
3.13 The majority of windfall sites fall within the 1-4 units category. Of the 150 small windfall completions in 2011/12, 35 (23%) were on sites of 5-9 units. Applying a figure of 20% to the longer term windfall allowance of 1,200 = 240. If 15-20% affordable housing could be secured it would yield 36-48 affordable units.

3.14 The yield will therefore be quite low and less certain than on large sites re viability. 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 and the Council will seek to achieve its policy requirements. Not budgeting for any affordable housing from windfall seems prudent at the current time given the announcement in Autumn Statement 2013 that the government would consult on introducing a ten-unit threshold for section 106 affordable housing contributions in order to reduce costs for small builders.

Other Evidence

3.15 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.

3.16 Further, the permissive planning policy context that enabled the past rate of completions/permissions is not set to change.



Performance against 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 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 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 5,776 dwellings by the end of the 2018/19 monitoring year. Given progress to date there is a residual 4,218. Applying a 20% buffer means that a deliverable supply of 5,062 dwellings must be identified.

Total Planned Provision	2011/12-28/29	13,000
Built over first three years	2011/12 - 13/14	1,558
Interim requirement for years 1-8 i.e. 5 years hence	2011/12 - 18/19	5,776
5 year Requirement (100%)	2014/15 - 18/19	4,218
5 year Requirement (120%)	2014/15 - 18/19	5,062
Deliverable Supply	2014/15 - 18/19	5,945