

# Bath and North East Somerset Local Plan

## Strategic Housing Land Availability Assessment

### Findings Report

(PCSCS.V3, November 2013)





# Strategic Housing Land Availability Assessment Findings Report

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## Appendices

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

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

# Introduction

- 1.1 The Strategic Housing Land Availability Assessment (SHLAA) is part of the evidence base for the Local Plan. The assessment is required by NPPF: 159. The SHLAA supports the preparation and review of the Local Plan. It presents a picture of the availability and suitability of land for development. Further, it attempts to establish realistic assumptions about the number of homes that this land could yield and the timeframe within which this might come forward to meet the identified need for housing over the plan period.
- 1.2 The SHLAA also plays an important role in the plan monitoring process, providing evidence of the level and distribution of past housing completions and on the sites that can contribute to the district's rolling five year housing requirement. This is important information for the Council's Development Management function in respect of determining planning applications for housing in respect of NPPF: 49.
- 1.3 This version of the SHLAA (PCSCS.V3) accompanies the Proposed Changes to the Submission Core Strategy (November 2013 consultation). It updates earlier versions (PCSCS.V1 & V2) that were published in March and June 2013. V2 took into account completions during 2012/13, evidence submitted during the consultation period and on-going intelligence gathering. During and after the consultation period on the Proposed Changes (March 2013) the Council has contacted the developers of sites (with and without planning permission) to ascertain realistic delivery assumptions in respect of 5 year land supply. V3 takes into account a range of further evidence prepared by the Council in respect of identifying specific Green Belt sites and all development management and appeal decisions made during 2013.

## 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 completion in the market for land. Where there has been a record of persistent under delivery of housing, LPAs should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and completion in the market for land.

- Identify a supply of specific deliverable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.
- For market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period<sup>1</sup> and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target.

- 1.6 For 2013/14 a 20% buffer is applicable on account of the shortfall in housing delivery experienced during the Local Plan period 1996-2011 of 1,167. This represented a 17% shortfall in delivery against a target of 6,855. The 20% buffer will persist until the Local Plan shortfall is cleared and delivery catches up with the cumulative total required by the annualised rate of the Core Strategy requirement. The reversion to a 5% buffer is forecast from 2016/17 and this is shown in the 'summary tab' of appendix 2.
- 1.7 Rather than prepare a Housing Implementation Strategy as a separate document the Council relies on the SHLAA to fulfil this function. Appendix 2 sets out what the Council considers can be delivered during the next 5 years and beyond. Against these projections, the current and forecast future 5 year land supply position is calculated. Maintaining a rolling 5 year land supply of deliverable sites requires that it be topped up each year (with a 5%-20% buffer depending on progress). It is important to remember that this years, sixth year will soon become next years fifth year and that to maintain a 5 year supply means looking ahead and enabling/securing medium term land supply.
- 1.8 NPPF 48: advises that LPAs may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the SHLAA, historic windfall delivery rates and expected future trends, and should not include residential gardens. The Council includes such an allowance and this is evidenced in Section 3 of this report. The Council also makes an allowance for windfall beyond the next 5 years (ref: Core Strategy Examination Document ID/28: 2.5).
- 1.9 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

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<sup>1</sup> See appendix 2

granted. The allocation of a site for development can only be made in the Local Plan. The Plan-making process will determine which suitable sites should come forward for development and for what level of development. SHLAAs often identify more suitable, available and achievable land than is required to meet the objectively assessed need for housing. Therefore, only the most suitable, sustainable and deliverable sites will be selected for development.

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

## Methodology

- 1.11 The geographic scope of the SHLAA covers:

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

- 1.12 The SHLAA comprises assessments of land parcels promoted by developers and landowners within and adjoining housing development boundaries. The Council has also assessed land adjoining housing development boundaries where there has not been a developer/landowner submission. This is because it is not always the currently available sites that are the most suitable sites for development and it is part of the Council's enabling role to pursue the most sustainable opportunities (as far as they are deliverable). Therefore, the SHLAA attempts to provide a comprehensive 360 degree assessment of all the land adjoining a settlement where resources permit. Additional land availability continues to be presented to the Council on an ad hoc basis as landowners learn of an engagement with the plan-making process.

- 1.13 Beyond the settlements listed in 1.7, the Council has not actively sought to identify sites for housing as the level of potential will be less strategic in nature. However, completed developments and existing planning permissions in the smallest rural settlements will still contribute to identifiable supply for the Core Strategy period and to 5-year land supply. Such settlements also contribute in a small way to the windfall; allowance for the rural areas

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

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

1.11 Whilst no stakeholder panel has been convened during the preparation of the SHLAA, the findings are open and transparent and enable interested parties to critically review the outputs and relay any observation to the Council for consideration. In some cases there may be a difference in planning judgement in respect of the suitability or capacity of a site. The Development Management process or Place-making Plan will determine the precise yields of individual sites. The Council has contacted developers, whose sites form part of the housing delivery trajectory in order to make reasonable assumptions about when development might take place.

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

# Key Findings of the Assessment

- 2.1 The assessments in Appendix 1 set out the Councils view of the housing potential, suitability, availability and achievability of many individual sites across the District. Some are on brownfield sites, others greenfield (including Green Belt). The sites are a range of sizes, from those that can accommodate at least 10 units to Green Belt areas that could yield 3,000.
- 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 a Local Plan that has been submitted for examination (as opposed to informing one in preparation). Therefore, the suitable and available sites that have been selected to be part of the housing and supply in the Local Plan 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 Bath

- 2.4 It is estimated that the existing urban area of Bath can deliver about 5,792 dwellings on suitable and available (or reasonably likely to become available) specifically identified sites between 2011/12 and 2028/29. To this figure can be added a small site windfall / broad location allowance of 780 (see Section 3) resulting in a total estimated supply of 6,572.
- 2.5 The housing trajectory (appendix 2) disaggregates this figure on a site specific basis. The supply figure for 'land within Bath' includes all sources less the proposed Green Belt allocations at Weston (150), Odd Down (300). The following paragraphs explain the current position in respect of some of the key sites.

## Western Riverside

- 2.6 Western Riverside is a residential-led allocation (GDS.1/B1) of the extant BANES Local Plan. It comprises a number of development areas; a core area being developed by Crest and with various planning consent; an eastern area currently dominated by Sainsbury's and Homebase; and a smaller strip of land along the northern bank of the River Avon.

## Western Riverside – Crest (Wes.1a, b and c)

- 2.7 The largest single site within Western Riverside is being developed by Crest Nicholson and outline planning permission was granted here in December 2011 for 2,281 flats and townhouses (06/01733/EOUT). At the same time reserved matters were also granted for the first phase of development, comprising 299 homes within buildings B3a, B4, B7, B8, B10, B10a and B10b . 206 of these were completed between 2011/12-12/13 and the remaining 93 are under construction and will be completed during 2013/14.
- 2.8 To the east of this first phase, reserved matters were approved in April 2013 (12/05590/RES) for 26 houses and apartments (buildings B1, B1a , B1b). 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). In May 2013, reserved matters were granted for building B17 (12/05387/ERES). This is an affordable housing block of 55 apartments.
- 2.9 In September 2013 Crest submitted a further reserved matters application (13/03929/ERES) for buildings B11, B13, B15a and B15b. The capacity of these blocks is 259 (197 market & 62 affordable).
- 2.10 Also in September 2013, Crest submitted pre-application details for buildings B5 and B16 for 98 market units (13/00018/PADEV).
- 2.11 Crest expects to deliver the capacity identified above by 2018. Further is also expects to submit a planning application for buildings B6, the remainder of B10 and B12 (67 market and 16 affordable) in time for them to be delivered by 2018/19.

- 2.12 These means that BWR will yield 820 units in total by this time. This capacity relates to the land that currently in the control of Crest within the parameters of 06/01733/EOUT.
- 2.13 Building B17 and most of the remainder of the other buildings within Crest's secured land area fall within an HSE exclusion zone in respect of the Windsor Bridge Gas Holders. The occupation of these buildings is dependent on the decommissioning of the gas holders as an operational facility. Further phases (on the unsecured land) will require the actual removal of the gasholders and associated land remediation.
- 2.14 The cost and time required to decommission and remove the gasholders and remediate the land has been a significant barrier to the delivery of the secured & unsecured land and has also affected the potential to develop other sites within BWR and Twerton Riverside. Crest, working in partnership with BNES are utilising £4.1m of funding from The West of England LEAs Revolving Infrastructure Fund (RIF) to address this matter, with Wales & West Utilities, the owner of the facility will undertaking the works
- 2.15 The latest position in respect of the RIF was presented to [Cabinet on April 10<sup>th</sup> 2013 \(item 188\)](#). The report to Cabinet demonstrates that a timely resolution in respect of enabling the development of the secured and unsecured land can be achieved. The decommissioning process will be concluded by the end of 2013. Demolition and decontamination will then take at least 18 months, following which the area can then be prepared for redevelopment.
- 2.16 The housing delivery trajectory for the next 5 years reflects the programme to decommission the facility and the intent of Crest. Beyond this point there is more uncertainty (as Crest need to secure the land from other owners). However, Crest remains committed to the entire site and has confirmed that the longer term delivery trajectory to 2029 (averaging 130 pa) is an achievable assumption.
- 2.17 An additional barrier to deliver is reached upon the occupation of 650 homes in respect of the need to provide a new bridge for traffic and pedestrians across the Avon. This too is being addressed via RIF funding.
- 2.18 Part of the unsecured land relates to the Councils waste facility on the upper Bristol road – which is that part of the part of the outline planning application area to the north of the river. The relocation of this facility currently remains unresolved, however the plan period still has many years to run and it is highly likely that this matter will be addressed in time to enable the delivery of this area.

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

- 2.19 The eastern part of Western Riverside was subject to a planning application for a supermarket-led development led by Sainsbury's (13/00983/EFUL) made in February 2013. This was withdrawn in September 2013, but a revised scheme is expected from the correspondence received in respect of withdrawal. The 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 remains in A1 use. It also proposed about 300 townhouses and flats and some office space. Sainsbury's do not control all of the land within the planning application area. Homebase currently have a lease with British Land to remain on their

current site until 2020. This could delay the implementation of planning permission if it was granted and alternative premises cannot be sourced to the satisfaction of Homebase. Given this uncertainty the housing trajectory does not allow for any housing delivery here until after 2020.

- 2.20 The Sainsbury's application area excludes the Help Hire 'gyratory' site, currently in office use with dedicated car parking (Wid.23c) and some dated commercial units on James Street West (King.6) but these locations are also available for redevelopment. Much of the James Street West frontage is now subject to a planning application for 183 student bed spaces (13/02574/FUL) although these would not count towards the LP housing target (which is net of any student housing element). The proposal relates to two of the three commercial buildings at this location. The building that hosts the NHS walk-in centre does not form part of the proposals. The Help Hire Site has been promoted during the consultation period on the Proposed Changes to the Core Strategy for retail use and car parking. There may be some synergy here in respect of the future of Homebase.

### Western Riverside – North Bank

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

### City Centre

- 2.22 The SHLAA assumes that any development sites in the city centre will be commercially led but would include housing as part of the land use mix. The SHLAA assumes that Avon Street Coach and Car Park and Manvers Street Car Park/Police Station/Post Office Depot will be redeveloped for a mix of uses and will contribute 250+ apartments. The precise mix of uses will be refined in Placemaking Plan and via the determination of planning applications. The Council owns the car parking facilities sites and the Police and Royal Mail have signalled the medium to long term availability of their. None of the sites form part of the 5 year land supply.
- 2.23 The estimated capacity of residential units on these city centre sites has increased in relation to the SHLAA that accompanied the Submission Core Strategy. This is on account of the application of new employment densities research from the [Homes and Communities Agency](#). This advises that office occupiers utilise about 25% less floorspace per worker than they did 10 years ago.
- 2.24 Previously, the general office density that was applied was 19 sqm GIA per worker. Now it is 12 sqm NIA per worker. This converts to 14 sqm GIA per worker. Thus 25% less floor space

needs to be allocated to achieve the office space requirements for Bath re the LEP Business Plan, and more space can be identified for residential or other town centre uses.

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

#### Former MoD sites at Ensleigh Foxhill and Warminster Road

- 2.26 In March 2013 the Defence Infrastructure Organisation (DIO) announced that it had disposed of these sites.
- 2.27 The capacity of the Foxhill site is estimated to be about 700 and has been purchased by Curo, the District's main social landlord. The involvement of Curo may result in a greater proportion of affordable housing coming forward on this site than the emerging policy requirement of 30% requires. For now though 30% affordable housing is assumed. An application for demolition works was submitted in May 2013 and Curo will be submitting a planning application for the site in Spring 2014. They expect to be delivering on-site from June/July 2015.
- 2.28 The capacity of Ensleigh is estimated by the Council to be about 350, although current proposals would result in about 300.
- 2.29 A small part of the site [E block] lies the south of Granville Road. This has been bought by Skanska, and a planning application for 40 houses and apartments was submitted in February 2013 (ref: 13/00734/FUL).
- 2.30 The core part of the site is in the control of IM Properties, with Bloor and Linden involved as developers. About 1/3 of the core part of Ensleigh is subject to a leaseback agreement with the DIO until 2018 but the remaining 2/3 is available now and can be delivered in advance of leased back area becoming available. Pre-application details and a request for a EIA screening opinion were submitted in July/August 2013 (REF). IM Properties aim to have achieved planning permission for the site by Q1 2014.
- 2.31 The Council has identified that the Royal High Playing Field immediately adjoining Ensleigh is available and that development here would increase the overall capacity of the area by 120 to 420 (in the context of the on the current proposals by IM Properties & Skanska). The Proposed Changes to the Submitted Core Strategy allocate this additional land for development. The additional land is not in the Green Belt or Cotswolds AONB. The site does not form part of the 5 year land supply as it has yet to be marketed for sale and would likely follow the delivery of the other areas.
- 2.32 The capacity of Warminster road was identified in the Concept statement for the site as being 120 and this site has been bought by a consortium comprising Square Bay, Firmstone and Edward Ware Homes. Square Bay confirm that they are looking to move forward relatively

swiftly to the extent that first completions can be expected during 2015/16. To this end pre-application proposals were submitted in September 2013. The consortium considers the capacity of the site to be nearer 250 plus a 65 bed care home. This is significantly more than assumed in the Council's Concept Statement for this site. The reasons for this are (1) non-inclusion of land for a primary school. (2) the use of some land beyond the previously developed area, higher densities than assumed. Having considered the approach taking by the developer the SHLAA now assumes a higher figure than presented in the Concept, of 150.

- 2.33 Collectively the capacity of all three sites (including the extension to Ensleigh) is considered by the Council to be about 1,300.

#### Other Sites

- 2.34 The identification of 100 units on the Bath Press and 150 units at Twerton Park are two relatively new additions to the SHLAA. The former reflects the refusal of a planning application for a large supermarket on this site, although an appeal decision is awaited 2013. The identification of 100 units reflects the contribution that high density housing could make to a mixed use development of this 2.2 ha site. The addition of Twerton Park reflects the position of the Football Club that their continuing occupation of this facility is not economically sustainable. Neither site forms part of the 5 land supply at present.
- 2.35 The latest significant addition to the identified supply sites for the Core Strategy period is NEW.1. The short term availability of this site has now been confirmed. A pre-application enquiry has been submitted in respect of residential development and the site has been placed in the 5 year supply of deliverable sites. The prospective applicant is proposing 180 units but the SHLAA budgets for 80 units based upon the conclusions of a previous lawful development certificate for a proposed use

# Land in the Green Belt adjoining Bath

- 2.36 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

- 2.37 In many respects this area presents a good opportunity to a deliver significant level housing on the edge of Bath. A Development Options Concept Report (Arup, 2013) identified the capacity of [Odd Down /Sulis Manor](#) as 750. This capacity of this area excluded Sulis Manor itself (3.0ha) and a land immediately to the east of Combe Hay Lane (3.0ha) from consideration as suitable areas for development. The land adjoining Combe Hay Lane forms part of an SNCI but appears have degraded recently. It is not suitable for housing development re undermining and land stability. There are also landscape and visual impact constraints here. Sulis Manor and its grounds are suitable for development.
- 2.38 Subsequent to the Arup analysis the Council has investigated further the extent to which the development in the setting of the Wansdyke SAM would harm its significance. It concludes that the harm would be substantial and that this should preclude the development of much of the eastern part of the site. The Council has also revaluated that impact that development would have on the way that Bath is revealed (or not) to the surrounding countryside and concludes that developing the southern part of the site would cause substantial harm to the OUV of the World Heritage Site.
- 2.39 The Councils analysis of this area result in a suitable developable area that can yield about 300 dwellings

## Lower slopes north of at Weston

- 2.40 A Development Options Concept Report in respect of the [Lower slopes at Weston](#) (Arup 2013) identified that adjoining the current built up area there are four to five suitable areas that could be developed for housing and that these areas could yield about 500 houses. The suitable areas exclude areas of spring streams/drainage channels and an SNCI.
- 2.41 Subsequent to the Arup analysis one field, behind Purlewent Drive, has been confirmed as a town and village green and is therefore not available for development. Further, a [Water Infrastructure and Geotechnical Prioritisation Report \(Arup, August 2013\)](#) reduces the developable zone to the extent that just 150 units could come forward on suitable and available areas.
- 2.42 In respect of deliverability the housing trajectory assumes that some development in these two area will be forthcoming during the next 5 years (from half way through year 3), (120 at Odd Down and 120 at Weston).

- 2.43 The Development of 1500 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.
- 2.44 The SHLAA also assesses the credentials of other large potential development cells around Bath but finds no evidence of large scale availability or any large suitable areas of land. The Council has not assessed the suitability credentials of National Trust Land at Claverton Down as it is not available. It has also not assessed the credentials of land south of Old Fosse Road on account of the steepness of the slopes and the presence of three ancient woodlands
- 2.45 Other medium sized and small parcels of land have been promoted around Bath. Land behind Minster Way is regarded as being unsuitable in respect of WHS Setting impacts. There is a small field atop the Odd Down plateau at Old Fosse Road (ref E.16) that has some potential for c.30 dwellings and there is also a site accessed off the Mdiford Road (ref E.14bi) that has the potential for about the same.

# Non Green Belt Land at Keynsham

- 2.46 The SHLAA concludes that Keynsham can deliver about 1,700 houses on suitable and available (or reasonably likely to become available) sites, including 180 on small windfall sites between 2011/12 and 2028/29.
- 2.47 Somerdale (700 dwellings) and Land at South West Keynsham (570) account for the vast majority of housing land supply at Keynsham.
- 2.48 A hybrid planning application for Somerdale (13/01780/EOUT) was permitted in September 2013. 270 units have been permitted in full, and 430 in outline. Taylor Wimpey is the developer.
- 2.49 Half of South West Keynsham (285 unit) is currently being developed by Taylor Wimpey (09/04351/FUL) and first completions are expected during 2013/14. The other half has been sold by the Council to Barratt and pre-application details have been submitted for 267 dwellings.
- 2.50 Limited potential has been identified for the intensification of suburban Keynsham in respect of large sites, although there are some modest opportunities adjoining the High Street.



# Land in Green Belt adjoining Keynsham

- 2.51 Landowners and developers have promoted a significant amount of land in the Green Belt to the east, west and south of Keynsham. Much of the land in the area is suitable for development, although there are some absolute constraints (notably HSE exclusion zones around gas pipe infrastructure in the Keynsham Salford gap and to a lesser extent on the west side of Keynsham), the Chew Valley, which divides Keynsham into two parts and The Hams. Where land is suitable, some areas are relatively stronger in respect of their sustainability credentials than others.
- 2.52 Four Development Concept Options Reports (Arup, 2013) explore the potential of the land around Keynsham. Broadly speaking it can be concluded that there is at least 2,500 units worth of suitable supply with an upper limit of 3,500 units if a greater level of landscape and visual harm is accepted. The delivery of much of this capacity where it relates to the Keynsham Salford gap may be subject to the provision of major highways improvements, which are not funded. Further, the potential to the south of Keynsham is not fully developable on account of transport planning matters

## East of Keynsham

- 2.53 To the [East of Keynsham](#), the Keynsham Salford gap is a large of area suitable housing land. There are some constraints here such as the presence of a national high pressure gas main and community woodland. Further, the railway is a barrier to unlocking development to the north. The Arup Report looks at the capacity of the area to absorb the eastward growth of Keynsham as far as the exclusion zone around the HSE exclusion zone around the gas main. Broadly speaking this area can be sub-divided into three cells and the Arup Report identifies that:
- Area (a) - north of the railway, could yield 650-830 dwellings  
Area (b) - between the A4 and the railway, could yield up to 350 dwellings  
Area (c) - south of the A4, could yield 750-950 dwellings
- 2.54 Area (b) is also partly identified a possible location for expansion of the Ashmead Industrial Estate. The utilisation of this option would reduce the areas potential capacity for housing.
- 2.55 In respect to of land availability, Mactaggart and Mikel are promoting the whole Keynsham – Salford gap to the south of the railway line. It is important to note that they are promoting not only the land to the west of the gas main, but also the land to the east i.e. a westward expansion of Salford. To the north of the railway line (area b) a single land owner is promoting a mixed use housing, employment and marina development on an area described as the Broadmead peninsula.

## Uplands

- 2.56 To the extreme south of the eastern finger of Keynsham, [Uplands](#) is also partly affected by the alignment of the gas main but the remainder of the area is suitable and available and

could yield 400-500 dwellings. It is though rather distant from the town centre, railway and A and performs poorly in highways terms.

### South Keynsham

- 2.57 To the extreme south of the western part of Keynsham (south of existing Local Plan allocation K2) Bloor Homes have promoted a development of about 1,000 dwellings. The Concept Options Report for [South Keynsham](#) presents three options for the development of this area, at 770, 560 and 300 dwellings. Each greater level of development has progressively more impact re landscape sensitivity, visual aspects and highways matters.

### West of Keynsham

- 2.58 To the [West of Keynsham](#) lies a potentially developable area sitting above Stockwood Vale. The most developable area is on the southern southern part of this plateau, although it is affected, in part, by the alignment of a gas pipeline. Since the publication of the Arup report the prospective developer has informed the Council that the alignment of the gas pipe is further west than previously supposed, meaning that a greater area is unencumbered by an exclusion zone and the housing potential is higher at about 75 dwellings, but limited to the most easterly field.
- 2.59 The central / northern part of plateau to the west of Keynsham cannot be accessed from the existing highways network without securing 3<sup>rd</sup> party properties on Lays Drive. It might be possible for third party land to be acquired but there is a clear achievability issue here and the impact on Lays Drive itself would need to be assessed. Gaining access to the extreme northern part of site seems impracticable given the presence of narrow cul-de-sacs off Lockingwell Road. Equally the final stretch of St Francis Road does not seem capable of being widened to achieve access.

# Land in the Green Belt to the SE of Bristol

- 2.60 A number land parcels have been promoted as being available for development. These are focused on Hicks Gate (RPS and Key Properties) and Whitchurch (Taylor Wimpey, Robert Hitchens, Horesworld and others).
- 2.61 A further large SHLAA submission relates to Stockwood Vale Golf Club. This is considered to be unsuitable for reasons relating to a lack of connectivity with the edge of Bristol, landscape impact, and Green Belt.

## Bristol City Council's Core Strategy

- 2.62 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.

## Hicks Gate

- 2.63 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 stop development. The potential of the area (within BANES) is at least from 650 and rises to 1200 if a greater level of environmental impact and Green Belt intrusion is accepted. It is the impact on the Green Belt and the separation of Bristol, Keynsham and Bath that is a key issue here. This is perhaps the most sensitive area of Green Belt in BANES. The impact on the highways network is also an area of concern with traffic already backing up along the A4 through Brislington.

## Whitchurch

- 2.64 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 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 the majority of Horseworld is removed from the equation then the capacity of the area is unlikely to exceed 2,000. Significantly less than this is currently deliverable in the

absence of major highways improvements. Barton Willmore suggest a first phase of 600 could come forward without such improvements.

- 2.65 Horseworld are currently pursuing enabling development of 125 units on part of their site to secure the future of the charity in this location (13/02164/OUT). Should permission be granted the majority of the remainder of the Horseworld site would not be available for development. Also in this area Robert Hitchins are appealing a decision the refuse a development of 285 dwellings between Whitchurch village and Stockwood (12/04597/OUT).

# Midsomer Norton, Radstock, Westfield, Paulton and Peasedown St John

## Within existing HDBs

- 2.66 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.
- 2.67 The supply is heavily influenced by the redevelopment of land in former industrial or railway use e.g. the former Paulton Printing factory (600), former Alcan factory, Westfield (170), the soon to be vacant Welton Bibby & Baron site (150), St Peters Factory (115) and Radstock Railway Land (210). These opportunities are supplemented by greenfield Local plan allocations e.g. Cautletts Close, Midsomer Norton (95) and Wellow Lane, Peasedown St John (95) which are under construction and will complete during 2013/14.
- 2.68 A number of modest, previously unidentified brownfield sites have supplemented supply during 2013 last few months related to the development programme of Curo. Elm Tree Inn (10), Bryants Avenue 14) and the Bakery Site in Radstock (14) are 100% affordable housing schemes totalling 38 units. This paces downward pressure on the need to generate affordable housing from mixed tenure schemes. Normally a development(s) of 125 homes would be needed to generate 38 affordable houses in the Somer Valley.

## Greenfield Sites outside HDBs

- 2.69 Much agricultural land has been put forward for development around Midsomer Norton, Radstock and Westfield. For many sites, development would result in a moderate to high landscape, visual or highways impact (i.e. resulting in low to moderate suitability credentials) but this does not necessarily mean they are not suitable for development (wholly or in part) if suitable master planning, mitigation and highways improvements can be achieved. Appendices 1di-iii set out the suitability credentials of each area that has been considered.
- 2.70 However, there are areas where development would cause too much harm in relation to the character and setting of each town and their Conservation Areas for it to be deemed suitable. Where this is the case a 'nil' suitability rating is given.
- 2.71 There is little evidence of availability on the periphery of Paulton although there are a number of suitable sites. The redevelopment of the former Polestar factory will continue about 10 more years (based on the current rate of implementation) and so, given the size of this redevelopment re Paulton, there seems little justification for a further expansion of the village during this time.
- 2.72 Peasedown St John has grown significantly as a commuter village to Bath There remains a limited amount of available and suitable land between the Bath Road and Lower Peasedown.

Elsewhere land is available to the south of the bypass. This is physically capable of accommodating development but the landscape and visual impact would be high and represent a breach of the contained nature of the village re the A367 bypass.

- 2.73 In short there is sufficient suitable land in the Somer Valley area that could be developed to supplement existing supply within HDBs if needed. There is likely more suitable land than should to be developed given the sustainability credentials of the Somer Valley.

# Rural Areas

2.74 Much of Bath and North East Somerset is rural and comprises small to medium sized villages. During the previous BANES Local Plan period these villages made a significant contribution to housing land supply, particularly in respect of small windfall sites. These villages have also grown over time as a result of planned growth and the allocation of land for development. There is a mixed picture of land availability and suitability across the rural villages that is not easy to summarise. In short the Assessment reveals that there are certainly options available to address NPPF: 54 and the requirement for LPAs to plan housing development to reflect local needs particularly for affordable housing.

# Windfall potential from small sites & broad locations

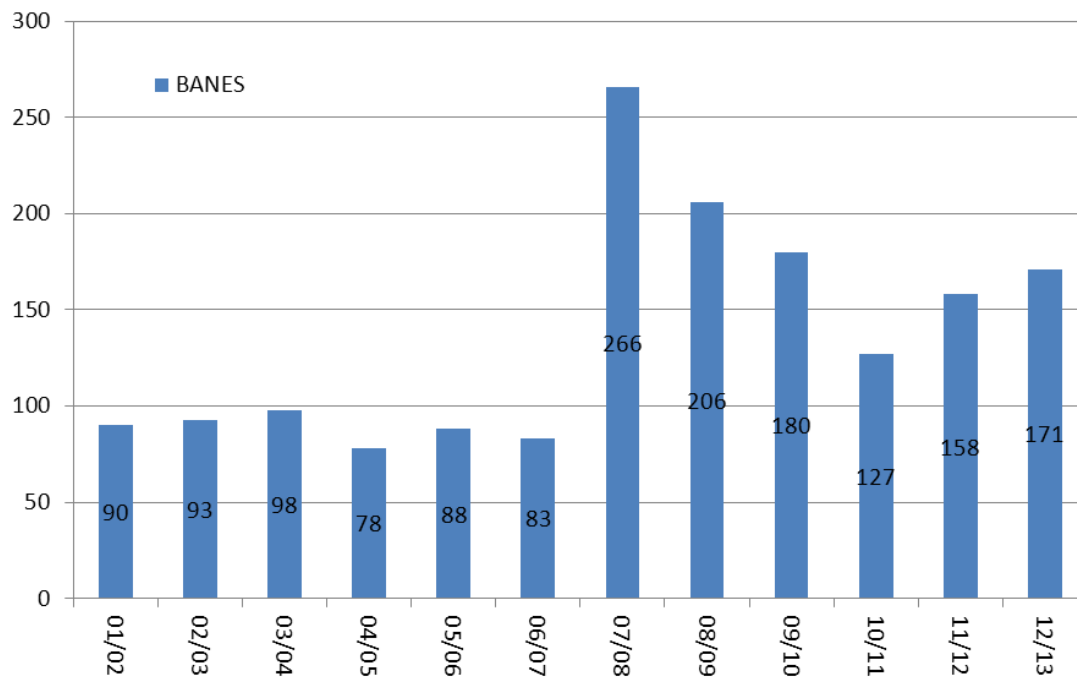
3.1 NPPF 48: advises that LPAs may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard 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 Council also makes an allowance for the delivery of housing on small sites beyond the next 5 years (ref: Core Strategy Examination Document ID/28: 2.5).

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

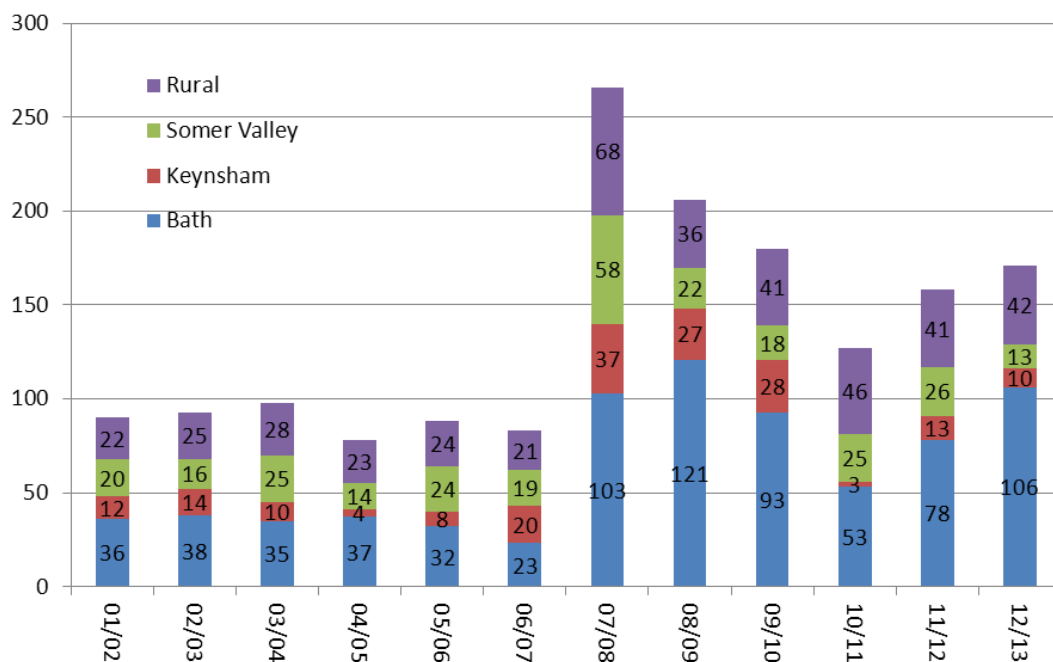
- Between 2001/02 and 12/13 (last 12 years) housing development on small sites contributed an average of **137 units a year**.
- Between 2001/02 and 2005/06 (first 6 years) the rate was lower and relatively stable at **90 units a year**
- Between 2006/07 and 2011/12 (last 6 years) the rate has been higher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



### Historic small windfall completions data for BANES



### Historic small windfall completions data by broad location



**Long term trend (2001/02-12/13) total small completions on small sites, annual average completions and split by broad location.**

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

**Short term trend (07/08-12/13) total small completions on small sites, annual average completions and split by broad location.**

	<b>07/08-12/13</b>	<b>6 Year Average</b>	<b>Proportionate Split</b>
Bath	554	92	50.0%
Keynsham	118	20	10.5%
Somer Valley	162	27	14.6%
Rural	274	46	24.7%
<b>BANES</b>	<b>1108</b>	<b>185</b>	<b>100%</b>

- 3.3 Based on past rates of delivery the Council considers that an allowance from small sites of not less than 100 per annum is clearly justifiable whereas the most recent 5 year average might be optimistic given the downward trend 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.
- 3.4 Given that the rate has been in excess of 150 a year for the last 5 of the last 6 years, this is deemed the most reliable windfall forecast until such time as a new trend emerges.
- 3.5 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.
- 3.6 At April 2013, the stock of small sites with planning permission was 448 and for the purposes of the SHLLA windfall allowance it is assumed that this number of units will be implemented within the next 5 years. Against this background the windfall allowance for the next 5 years from 2013/14 would be 302.
- 3.7 The analysis so far has not been adjusted in respect of the need to remove the greenfield windfall component (residential gardens, barn conversions and other previously undeveloped

sites). Since 2006, 20% of small site completions have been on greenfield sites. On this basis, the unadjusted windfall allowance of 300 (for the first five years) should be adjusted to 240 (or 48 per annum).

- 3.8 For the purpose of preparing the housing delivery trajectory the Council has 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 apportionment.

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

#### Allowance for unidentified small sites and beyond the five-year supply (ID/28, 2.5)

- 3.9 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 is figure is adjusted by 20% re the discount for greenfield development, this reduces to 1,320 units (120pa).
- 3.10 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).

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

#### Windfall Allowance and Affordable Housing

- 3.11 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.

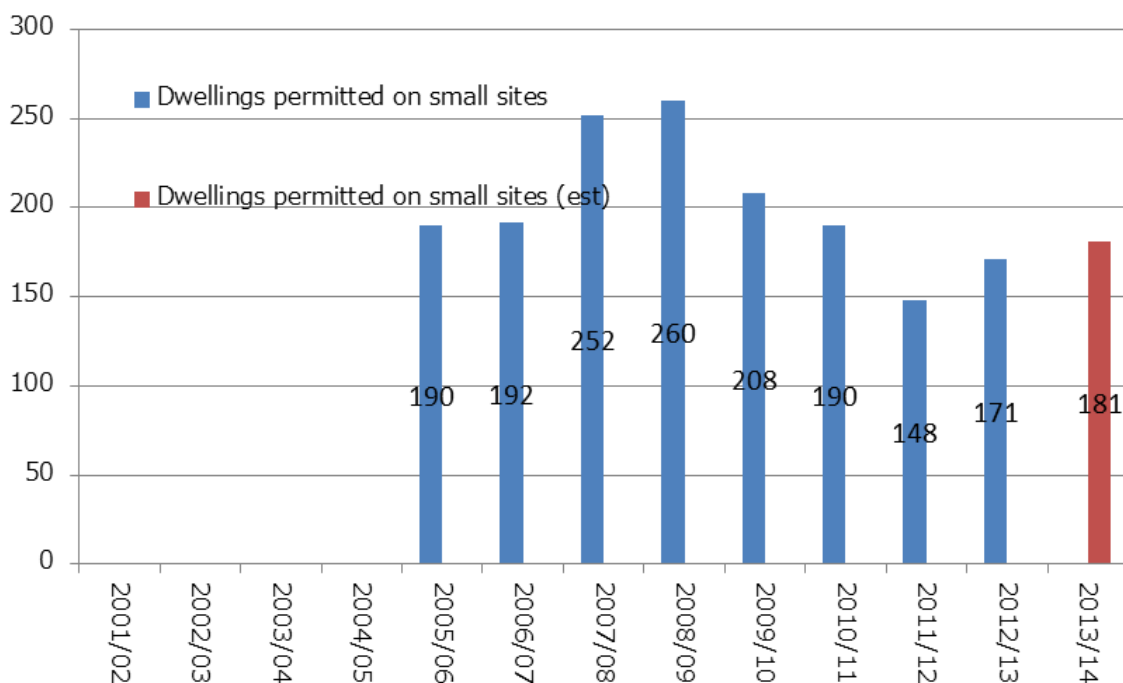
3.12 The majority of windfall sites fall within the 1-4 units category. Of the 150 small windfall completions in 2011/12, 35 (23%) were on sites on 5-9 units. Applying a figure of 20% to the longer term windfall allowance of 1,200 = 240, which at 15-20% could yield 36-48 affordable units.

3.13 The yield will therefore be quite low and less certain than on large sites. 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.

**Other Evidence**

3.14 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 for 2013/14 is an estimate based on 106 permissions being granted in the 7 months April-Oct 2013.

3.15 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 and in which the 5 year requirement and supply position is set out. The position is set out for market housing, affordable housing and in respect of the aggregate housing requirement.
- 4.2 The 'Sedgefield' approach is applied to this 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. This means that the 5 year land supply calculation is based on the Local Plan backlog being dealt within the period 2011-2016 (i.e. the first five years after the end of the Local Plan period). The figures for 2013 are a projection, and April 2014 is the vasa date of the 5 year calculation. A summary of Appendix 2b re 5year land supply is presented below.

## Market Housing

- 4.3 The table overleaf shows that BANES needs to deliver 2,835 market dwellings by 2018, with the first 5 years frontloaded to account for the Local Plan shortfall during the period 1996-2011.
- 4.4 By the end of 2013 1058 will have been built whereas 1,233 should have been and so 87% of the target has been achieved. Another way of looking at this data is that, effectively, whilst the 755 Local Plan shortfall has been cleared only 303 units have been built that contribute to newly arising need, whereas 780 should have been. Therefore BANES is still significantly behind schedule and a 20% buffer is applicable re 5 year supply. This result is a need to identify 2,132 units in specific deliverable sites (and windfall) and the Council can identify 3,893.

	2011	2012	2013	2014	2015	2016	2017	2018	11-18
LP Backlog Req	151	151	151	151	151				755
Newly Arising Req	260	260	260	260	260	260	260	260	2,080
<b>Total Req</b>	<b>411</b>	<b>411</b>	<b>411</b>	<b>411</b>	<b>411</b>	<b>260</b>	<b>260</b>	<b>260</b>	<b>2,835</b>
Delivery	219	413	426						
5 year Requirement +20% buffer				2,835-1058 = 1,777 x 1.2 = 2132					2,132
Forecast Delivery				413	724	1076	943	737	3,893

### Affordable Housing

4.5 The table below shows that BANES needs to deliver 1,690 affordable dwellings by 2018, with the first 5 years frontloaded to account for the Local Plan shortfall during the period 1996-2011.

4.6 By the end of 2013 465 will have been built whereas 726 should have been and so 58% of the target has been achieved. Another way of looking at this data is that, effectively, whilst the 755 Local Plan shortfall has been cleared only 55 units have been built that contribute to newly arising need, whereas 480 should have been. Therefore BANES is still significantly behind schedule and a 20% buffer is applicable re 5 year supply. This result is a need to identify 1,470 units in specific deliverable sites (and windfall) and the Council can do so.

	2011	2012	2013	2014	2015	2016	2017	2018	11-18
LP Backlog Req	82	82	82	82	82				410
Newly Arising Req	160	160	160	160	160	160	160	160	1,280
<b>Total Req</b>	<b>242</b>	<b>242</b>	<b>242</b>	<b>242</b>	<b>242</b>	<b>242</b>	<b>242</b>	<b>242</b>	<b>1,690</b>
Delivery	244	137	84						
5 year Requirement +20% buffer				1,690-465=1,225 x1.2 =1,470					1,470
Forecast Delivery				157	295	457	306	259	1,474

### Aggregate / Total Housing

4.7 The table below shows that BANES needs to deliver 4,525 dwellings by 2018, with the first 5 years frontloaded to account for the Local Plan shortfall during the period 1996-2011.

4.8 By the end of 2013 1523 will have been built whereas 1,959 should have been and so 78% of the target has been achieved. Another way of looking at this data is that, effectively, whilst the 1,167 Local Plan shortfall has been cleared only 356 units have been built that contribute to newly arising need, whereas 1260 should have been. Therefore BANES is still significantly behind schedule and a 20% buffer is applicable re 5 year supply. This result is a need to

identify 3,602 units in specific deliverable sites (and windfall) and the Council can identify 5,366.

	2011	2012	2013	2014	2015	2016	2017	2018	11-18
LP Backlog Req	233	233	233	233	233				1,165
Newly Arising Req	420	420	420	420	420	420	420	420	3,360
<b>Total Req</b>	<b>653</b>	<b>653</b>	<b>653</b>	<b>653</b>	<b>653</b>	<b>420</b>	<b>420</b>	<b>420</b>	<b>4,525</b>
Delivery	463	550	510						
5 year Requirement +20% buffer				4525-1523= 3002 x1.2= 3602					3,602
Forecast Delivery				570	1018	1533	1249	996	5,366

5 year supply in relation to the current official household projections (CLG Interim 2011 based household projections, April 9<sup>th</sup> 2013)

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

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

4.11 For the 5 year supply period from 2014 the following data is relevant

	2011	2012	2013	2014	2015	2016	2017	2018	11-18
LP Backlog Req	233	233	233	233	233				1,165
CLG Req	453	453	453	453	453	453	453	453	3,624
<b>Total Req</b>	<b>686</b>	<b>686</b>	<b>686</b>	<b>686</b>	<b>686</b>	<b>453</b>	<b>453</b>	<b>453</b>	<b>4,789</b>
Delivery	463	550	510						
5 year Requirement +20% buffer				4789-1523= 3266 x1.2= 3919					3,919
Forecast Delivery				570	1018	1533	1249	996	5,366

# Appendix 1: Performance against Local Plan Housing Target 1996-2011

- Appendix 1 provides a short briefing of B&NES historic data in relation to housing policy and delivery. The Local Plan housing requirement for the period 1996-2011 was 6,855. Performance against this target at the end of the LP period is set out below.

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

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

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