

Bath and North East Somerset

Core Strategy Topic Paper 7 Keynsham and Somer Valley Site Capacities and Delivery

August 2011



**Bath & North East
Somerset Council**

The logo for Bath & North East Somerset Council features the text "Bath & North East Somerset Council" in a green, sans-serif font. The text is centered between two horizontal blue bars.

Bath and North East Somerset
Local Development Framework

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Introduction

1. This paper has been prepared to assist the Inspector on the capacity and deliverability of sites within Keynsham and the Somer Valley. This is in response to the Inspector's preliminary comments and questions note (ID/1), where he requests a topic paper which brings together and identifies the relevant material that has informed the Council's assessment of these sites.
2. The Inspector acknowledges in paragraph 11 of ID/1 that the Core Strategy is not making site specific allocations and it will be the role of the forthcoming Placemaking Plan (A development Plan Document) to resolve the detail of the type and scale of development on particular sites. Therefore the Core Strategy does not, and should not, seek to set out detail beyond its strategic remit.
3. Much of the site capacity estimation in these two areas has been influenced by work carried out for the Council by urban design consultancy *New Masterplanning*, who were appointed during 2009 to carry out an urban design led appraisal of Keynsham and Midsomer Norton, assess the capacity of potential development sites and develop urban design principles for each town centre. This work concluded with the public consultations on development proposals detailed in Core Documents CD4/UDL10 and CD4/UDL11.
4. PPS25 requires that Local Planning Authorities (LPAs) allocating land in LDDs for development should apply the Sequential Test to demonstrate that there are no reasonably available site in areas with a lower probability of flooding that would be appropriate to the type of development or land use proposed. The Core Strategy does not allocate any specific sites, but because it contains place based policies with identified locations for development with key development principles, high level sequential and exception tests were undertaken. (CD6/D4). To ensure flood risk is taken into account at all stages in the planning process, a sequential approach will also be taken within Keynsham (KE2) and Radstock (SV3) town centres and further sequential/exception test will be applied at the site allocations stage.

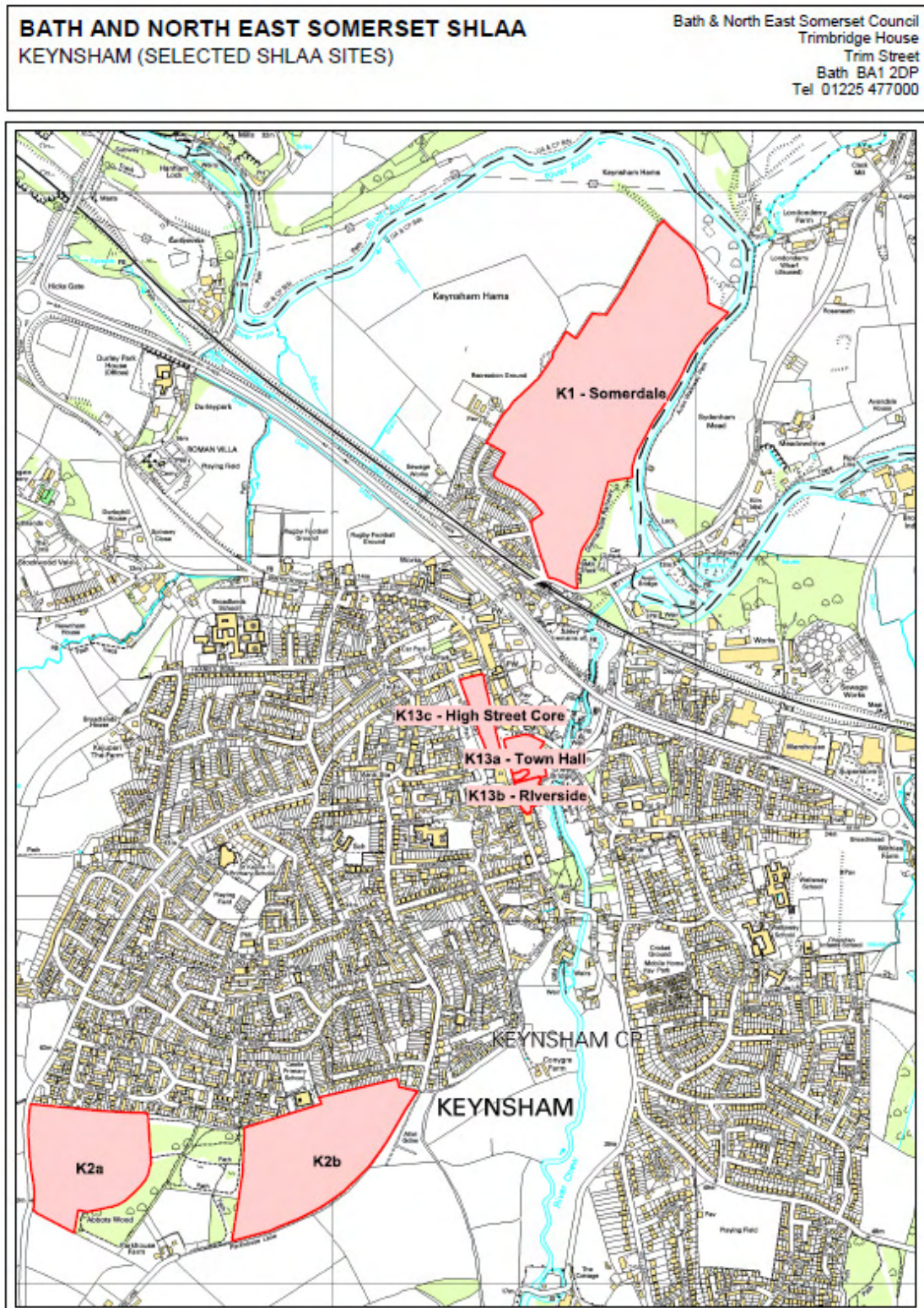
Keynsham

SHLAA

5. The draft Core Strategy proposes the development of 1,500 homes for Keynsham during the Plan period. The SHLAA Findings Report 2.1 (CD4/H13) identifies 1,539 units of suitable, available and deliverable/developable supply, with the majority of this supply being accounted for by Somerdale (600 dwellings), 'K2' - land at South West Keynsham (530 dwellings), and the Centre/Town Hall/Riverside area of Keynsham town centre. These main development sites are showed in the map below.
6. The deliverable/developable supply estimate does not include a small sites 'windfall' allowance for 10 years from the anticipated date of the adoption of the Core Strategy (April 2012). However, a small site windfall allowance of 17dpa could be identified from 2022/23 onwards. Small site completions to date (115 of the 205 dwellings built between 2006/07 – 2010/11) and units on small sites with planning permission (54) do count towards supply.

		Achievability			
		Built	Deliverable	Developable	
	Total	2006/07 - 2010/11 Years 1-5	2011/12 – 2015/16 Next 5 years	2016/17 – 2020/21 Further 5 years	2021/22 – 2025/26 Final 5 years
Keynsham	1,539	205	584	585	165

Diagram 1: Keynsham selected SHLAA sites



Somerdale: Capacity

7. The SHLAA (CD4/H13) estimates the capacity of Somerdale to be 600 dwellings. The site could, according to SHLAA, theoretically deliver up to 975 dwellings if the entire developable site (around 25ha) was developed for housing (80% developable area at 50dph). However, the site is identified in SHLAA as one which could support a mix of uses, a view supported by the Business Growth and Employment Land Study (CD4/E1) which states that Somerdale has significant potential for office development, and could also accommodate B1(c) light industrial.
8. In 2009, after the decision was taken by Cadbury to close the factory, a 'Vision for Somerdale' was prepared for the company by LDA Design (CD4/UDL18) to show how a mixed-use development could be achieved on the site. The Vision (supported by a landscape framework – CD4/UDL19) outlines a range of development principles aimed at creating a unique place with a strong identity which will integrate with and contribute to the regeneration of Keynsham Town Centre. The Vision identified the potential for Somerdale to accommodate approximately 600 residential units and 20,000sqm of employment floorspace with sports and recreation facilities. A public exhibition was held in Keynsham in February 2009, and the documents were reported to the Council's Development Control Committee.
9. This Vision was reviewed by urban design consultancy New Masterplanning as part of their work which informed both the draft Core Strategy policies and the Economic Regeneration Delivery Plan (ERDP) for Keynsham (CD4/E5). The New Masterplanning work led to public consultation on proposed Keynsham town centre development proposals (CD4/UDL11) between August and September 2010. The principles outlined in the New Masterplanning work and the consultation exhibition for Somerdale included strategic opportunities for mixed use residential/commercial/leisure development; potential to convert some of the factory buildings; and improved green infrastructure connections.
10. The Keynsham Economic Regeneration Delivery Plan (CD4/E5) states that the site has the potential to achieve up to 600 houses as part of a mixed use redevelopment.
11. Based on the evidence outlined above, the draft Core Strategy identifies Somerdale as a major development opportunity within Policy KE2 which makes provision for up to 700 dwellings within the policy area. Somerdale is identified in the Policy for a mix of uses, including significant employment floorspace (which includes the uplift in office floorspace within Keynsham from 20,000sqm in 2006 to 30,000sqm in 2026 as required in Policy KE1); new homes (which assumes that 600 dwellings will be delivered at Somerdale, with the remainder being accommodated within the Centre/Town Hall and Riverside offices redevelopment / refurbishment); leisure and recreational uses. The residential capacity for the site is therefore consistent in SHLAA, the ERDP and the Core Strategy.
12. The illustrative masterplan for Somerdale produced by New Masterplanning is shown below:

Diagram 2: Somerdale Illustrative Masterplan (CD4/UDL11)

Illustrative masterplan



Somerdale: Flood Risk/Sequential and Exceptions Test

13. The SHLAA (CD4/H13) notes that much of the land to rear (north) of the factory, and its eastern flank falls within Flood Zone 2 and affected by increased risk of flooding from climate change. Fringes of the site fall within Flood Zone 3a, together with the entire Hams area. This is illustrated in the map below taken from the Sequential and Exceptions Test information paper (CD6/D4). The flood zones have been taken into account when calculating the capacity of the site; for instance the Hams is not considered suitable for any development, whilst land to the north of the factory will be more appropriate for employment uses. This still leaves a significant amount of land that is suitable for residential use.

Diagram 3: Keynsham SFRA Flood Zones (CD6/D4)

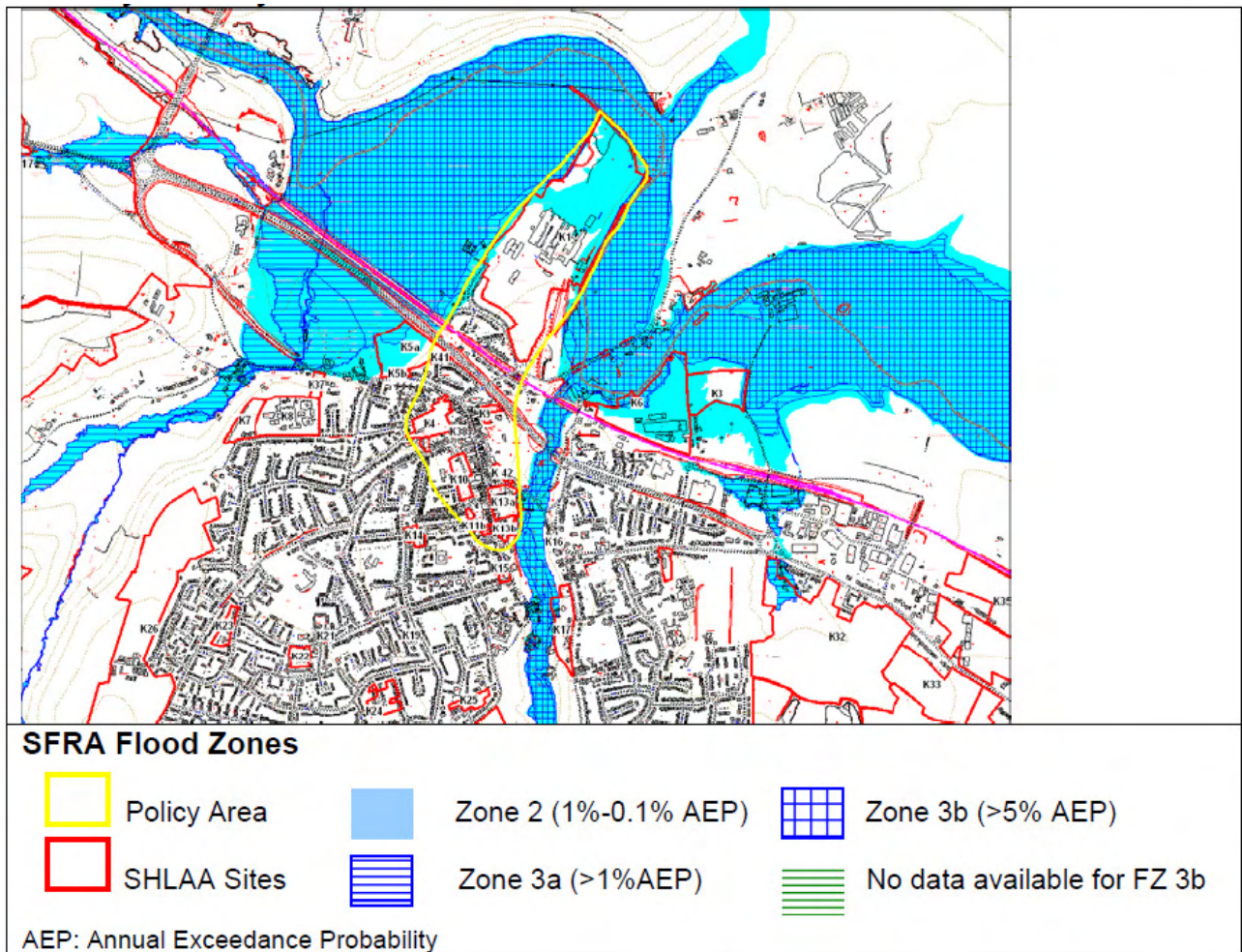
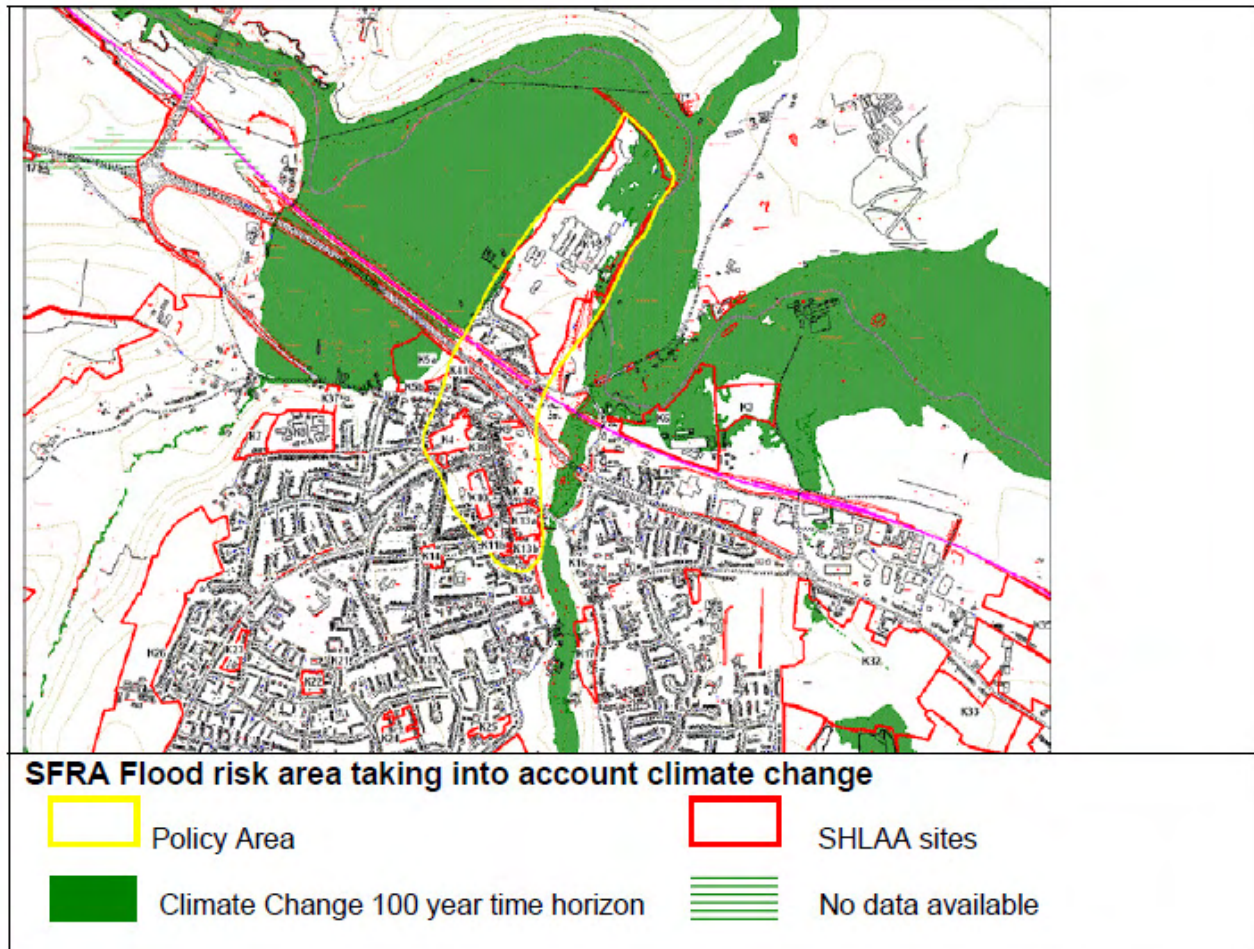


Diagram 4: Keynsham SFRA Flood Risk area taking into account climate change (CD6/D4)



14. The Environment Agency notes in its consultation response to the draft Core Strategy (CD7/2) that the Sequential and Exception Test report (CD6/D2) has sought to justify locating development here, despite part of the site designated as Flood Zone 2, based on other sustainable considerations that need to be taken into account. The Sequential and Exception Test report (CD6/D2) shows that there are no suitable alternative areas within Flood Zone 1 to facilitate the level and type of development required to support regeneration of Keynsham Town Centre and redevelop the Somerdale site incorporating wider sustainable development principles.
15. The Sequential and Exception Test report also recommends that no residential development should be considered within Flood Zone 3, and a sequential approach should be taken within the site. Subject to the Inspector being satisfied that the Council have applied appropriate weight to these other sustainability considerations compared to flood risk, and therefore justifying locating new development in this flood risk area, the Environment Agency has raised no objection. The Environment Agency support the fact that the Sequential and Exception Test report recommends that a sequential approach

should be taken to the masterplanning of the Somerdale site, which they highlight as important given the significant opportunity that exists to direct development away from flood risk at Somerdale.

Somerdale: Delivery

16. Commercial operations ceased at the chocolate factory at the beginning of 2011. Representations made by BNP Paribas on behalf of the current landowner Kraft on the draft Core Strategy, SHLAA and ERDP process **confirm that the site is available, deliverable and suitable** and that the draft Core Strategy is correct to promote the development of Somerdale. In their draft Core Strategy consultation response, BNP Paribas *“Fully support and endorse the identification of Somerdale as part of a strategic development site within policy KE2”*.
17. The site is currently being sold on a freehold basis by BNP Paribas on behalf of Kraft. The Somerdale site sale brochure¹ states the buildings have *“exceptional potential for a new, distinctive high-quality neighbourhood, utilising its water-meadow setting and the river for a mix of employment, residential and recreational uses”*, including *“around 600 homes on the site as well as extensive employment space”*. A number of potential developers are in discussion with Kraft over their proposals. Press reports suggest² that *“bids are now being analysed and an announcement will be made in due course. There was a lot of interest in the site.”*
18. A planning position statement was prepared by BNP Paribas in March 2011 (CD4/O11) to assist potential bidders in understanding the planning position of the site, the content of which was agreed by officers of the Council. This document confirms that the Council will engage with the successful bidders in a comprehensive pre-application Development Team process to negotiate and agree how best to proceed through the various stages of the Development Management process.
19. A close working relationship has been established between the Council and BNP Paribas, with monthly Somerdale Working Group meetings being held. The planning position statement states that the Council has indicated a willingness to explore entering into a Planning Delivery Agreement with the successful purchaser of the site in which definite timelines (and the resources necessary to achieve them) could be agreed more precisely.
20. With regard to development constraints on site SHLAA (CD4/H13) confirms that the current factory buildings are not considered to be of any special architectural or historic interest according to DCMS. The Somerdale buildings are not statutorily or locally listed, nor are they located within a Conservation Area. However, it should be noted that the draft Core Strategy requires any potential developer to consider the potential for converting and reusing some or all of the factory buildings. There is also potential for significant archaeological remains at the site. Detailed assessment work will be required as part of the process of masterplanning.

¹ www.somerdalecadbury.co.uk

² <http://www.thisisbath.co.uk/Kraft-talks-parties-development-Somerdale-factory/story-12941261-detail/story.html>

21. Infrastructure required to enable development of the site is set out in the Infrastructure Delivery Programme (CD4/I2) and SHLAA. The HCA 'single conversation' West of England Delivery and Infrastructure Delivery Programme (CD4/I4) includes £0.3m of public investment by 2015 in support of planning work to enable the proposals for Keynsham town centre and Somerdale to come forward. This is included in table 6 of the draft Core Strategy as a key infrastructure item, referenced in the infrastructure delivery plan (CD4/I1 & CD4/I2) as KI.1.

Land at South West Keynsham (K2): Capacity

22. The 'K2' sites are located in south west Keynsham and are allocated for housing in the adopted Local Plan. Policy GDS.1 (K2) of the Local Plan sets the capacity of K2 to be '*up to 700 dwellings (about 500 delivered in the plan period) with the final capacity to be decided by a comprehensive masterplan approach*'. The site comprises two parcels of land separated by a wood and is approximately 20.2ha. This allocation forms an important part of the spatial strategy for Keynsham outlined in the draft Core Strategy.
23. The SHLAA (CD4/H13) states that pre-application masterplanning was undertaken between the Council's Property Services team (the Council owns the western parcel of land) and Taylor Wimpey (who own the eastern parcel of land) which resolved that the optimum number of dwellings which the site can accommodate is about 530.
24. A planning application was submitted for the eastern parcel of land by Taylor Wimpey in November 2009 (09/04351/FUL), for 285 dwellings, retail accommodation, employment floorspace, access, public open space, junior playing pitch and changing facilities, and an extension to Castle Primary School.

Land at South West Keynsham (K2): Delivery

25. The K2 sites were removed from the Green Belt in 2007 when they were allocated for development within the Adopted Bath & North East Somerset Local Plan (CD5/1).
26. The Taylor Wimpey planning application was granted approval by the Secretary of State³ on 22/7/11.
27. The Council's Property Services team are progressing with the delivery of the western parcel of land, which is expected to deliver approximately 250 dwellings, and have employed consultants in order to submit a future planning application.

The Centre/Town Hall: Capacity

28. The Town Hall site is a major redevelopment opportunity in the town centre which is wholly in the land ownership of the Council (apart from the fire station),

³ Appeal reference: APP/F0114/A/10/2143212

and identified in the draft Core Strategy as being a key opportunity site. Policy KE2 of the draft Core Strategy makes provision for new office development at the Centre/Town Hall site which includes a new library, retail units, leisure facilities and residential dwellings.

29. Urban design consultancy New Masterplanning were commissioned by the Council to produce a masterplan for the Town Hall site in order to inform the draft Core Strategy policies and also the ERDP for Central Keynsham (CD4/E5). The New Masterplanning work led to public consultation on Keynsham town centre development proposals (CD4/UDL11) between August and September 2010.
30. The indicative masterplan below shows that a block currently occupied by the fire station has potential for residential use. This evidence informed the SHLAA (CD4/H13) which states that the site could accommodate about 20 dwellings.

Diagram 5: Indicative Town Hall Masterplan (CD4/UDL11)



The Centre/Town Hall: Delivery

31. The Council commenced work on the £33m Keynsham Town Centre Regeneration Project (CD4/UDL12) in early 2011 to deliver new retail units, a one stop shop and library for people to access local services, new and improved public space, and new Council office space. A press release by the Council⁴ in June 2011 stated that public consultation will take place during Autumn 2011 on the redevelopment proposals, and confirmed the Council's commitment to regeneration of the Keynsham town centre site.

Riverside: Capacity

32. The Riverside complex comprises office space, retail units, snooker hall and Keynsham Leisure Centre, fronting to Temple Street and looking over Memorial Park. The building is currently underutilised and has an outdated appearance therefore presenting a significant regeneration opportunity. It has a floorspace of approximately 6,750sqm. Opportunities for refurbishment are being considered as part of the wider redevelopment of the Town Hall site.
33. The ERDP (CD4/E5) states that a comprehensive proposal for the refurbishment of the Riverside block could provide a new mix of uses, retaining the leisure and retail space. The refurbishment could provide up to 3,000sqm of new residential accommodation; approximately 3,000sqm of refurbished office space; and retention of the existing leisure and retail space facilities. The SHLAA (CD4/H13) states that initial capacity estimates show a maximum potential for 75 dwellings through conversion. This assumes a net useable area of 5,400 sqm (80%) and an average unit size of 70 sqm. Taking the ERDP into account, the SHLAA estimates the housing potential for Riverside is 35 dwellings.

Riverside: Delivery

34. The Council's press release in June 2011 on the Town Hall proposals (see reference above) stated that consultation during Autumn 2011 would include options for the Riverside building.

High Street Core: Capacity

35. The ERDP (CD4/E5) states that The western side of the High Street has the potential to be comprehensively redeveloped. Opportunities exist to amalgamate and redevelop existing units to create larger, more regular sized units to attract higher quality retailers. The creation of local offices and apartments at upper levels including 'rear frontages' with appropriate parking and servicing, will bring more life and activity to the town centre. The ERDP states that there is potential for 2,500sqm of residential floorspace within this redevelopment, which the SHLAA translates to 35 dwellings. The illustrative masterplan developed by New masterplanning (CD4/UDL11) is shown below.

⁴ <http://www.bathnes.gov.uk/news/latestnews/2011/june/Pages/Keynshamregenerationtimelineupdate.aspx>

Diagram 6: Indicative High Street Core Masterplan (CD4/UDL11)



High Street Core: Delivery

36. There is established demand to deliver new, modern, larger shops units in Keynsham town centre. With planned employment growth at the Town Hall this demand will increase. The Council is working together with landowners to regenerate this area and is led by the Council's Development and Regeneration team.

The Somer Valley

SHLAA

37. The draft Core Strategy proposes the development of 2,700 homes for the Somer Valley area during the Plan period. The SHLAA findings report 2.1 (CD4/H13) identifies 2,642 units of suitable, available and deliverable/developable supply. Of these 2,642 dwellings, 79% (2,077) have already been committed: 599 dwellings have been built, 1288 dwellings have planning permission and 190 dwellings are allocated in the Local Plan. This means that only 23% (623 dwellings) of 2,700 dwellings are being proposed as new commitments through the Core Strategy.

*The deliverable/developable supply estimate does not include a future 'windfall' allowance for small sites.

38. A summary of the SHLAA for the Somer Valley is below:

		Achievability			
		Built	Deliverable	Developable	
	Total	2006/07 - 2010/11 Years 1-5	2011/12 – 2015/16 Next 5 years	2016/17 – 2020/21 Further 5 years	2021/22 – 2025/26 Final 5 years
Somer Valley	2,642	599	1,370	673	0
Midsomer Norton	902	229	383	290	0
Radstock	550	69	264	217	0
Small sites	144	84	60		0
Peasedown St John	120	25	95	0	0
Paulton	826	134	526	166	0
Small sites	100	58	42	0	0

39. A key issue in the Somer Valley that the Core Strategy seeks to address is the imbalance between jobs and homes. This is largely a result of past incremental housing development and a decline in the manufacturing sector. In response, the Vision for the Somer Valley is to become more self-reliant, facilitated by economic-led revitalisation, creating more employment opportunities.
40. Alongside the employment issues, the lack of formal open space has been identified as a key strategic issue. Land in Midsomer Norton has been identified and allocated for a proposed Town Park through the Local Plan. The land owner has indicated that they would support the Town Park proposal as part of a mixed use development.
41. Therefore the Strategy for the Somer Valley is to create more jobs and seeks to ensure that further residential development than that already built, allocated or

has permission (approximately 600 dwellings) is only allowed where it brings employment or other community benefit such as the proposed Town Park. The focus for change will be in the town centres of Midsomer Norton and Radstock, and on vacant and under-used brownfield sites.

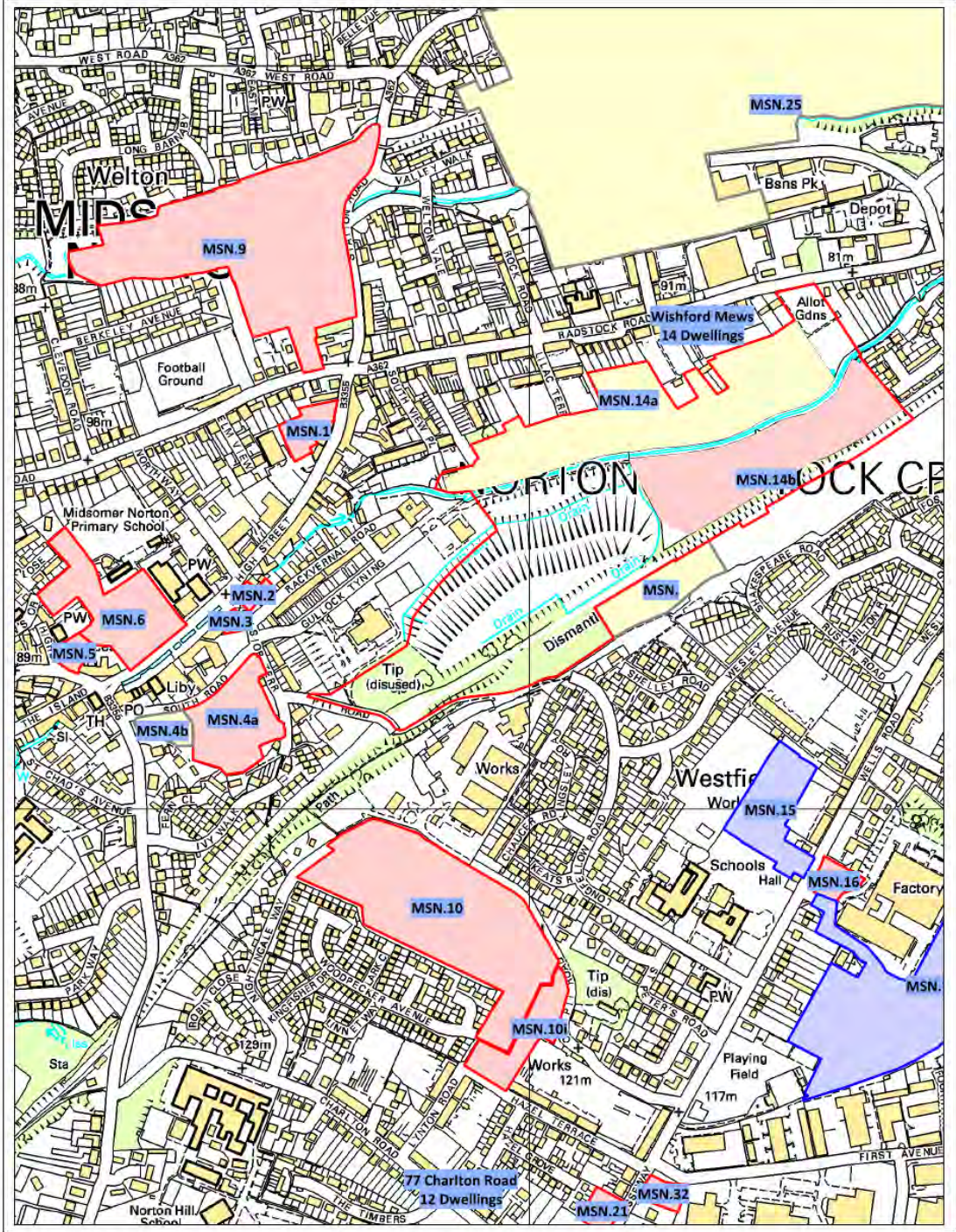
Midsomer Norton Town Centre

42. The Council's Economic Regeneration Delivery Plan (ERDP) for Midsomer Norton (CD4/E6) was prepared concurrently with the development of the Core Strategy. To inform both initiatives, *New Masterplanning* was commissioned to undertake urban design capacity work for Midsomer Norton. This identified a series of redevelopment opportunities within the town centres and the mechanisms necessary to realise their implementation. The New Masterplanning work led to public consultation on proposed Midsomer Norton town centre development proposals (CD4/UDL10 – shown below) between August and September 2010. Based on the New Masterplanning work the SHLAA (see extract below) identifies the capacity of 183 dwellings in the town centre (SHLAA ref: MSN1-5). This informed Core Strategy Policy SV2 which proposes about 200 dwellings in the town centre.
43. These proposals are now part of the Council's economic strategy for the Somer Valley and also underpin the emerging spatial strategy for the town centre.
44. All potential development sites within Midsomer Norton town centre (Policy SV2) are within Flood Zone 1 therefore the Sequential Test (CD6/D4) concluded that this policy area is deemed suitable for residential and mixed use development without the need for further consideration of flooding issues, apart from application of sustainable drainage.

Diagram 7: SHLAA map for Midsomer Norton town centre

BATH AND NORTH EAST SOMERSET SHLAA
MIDSOMER NORTON TOWN CENTRE

Bath & North East Somerset Council
 Trimbridge House
 Trim Street
 Bath BA1 2DP
 Tel 01225 477000

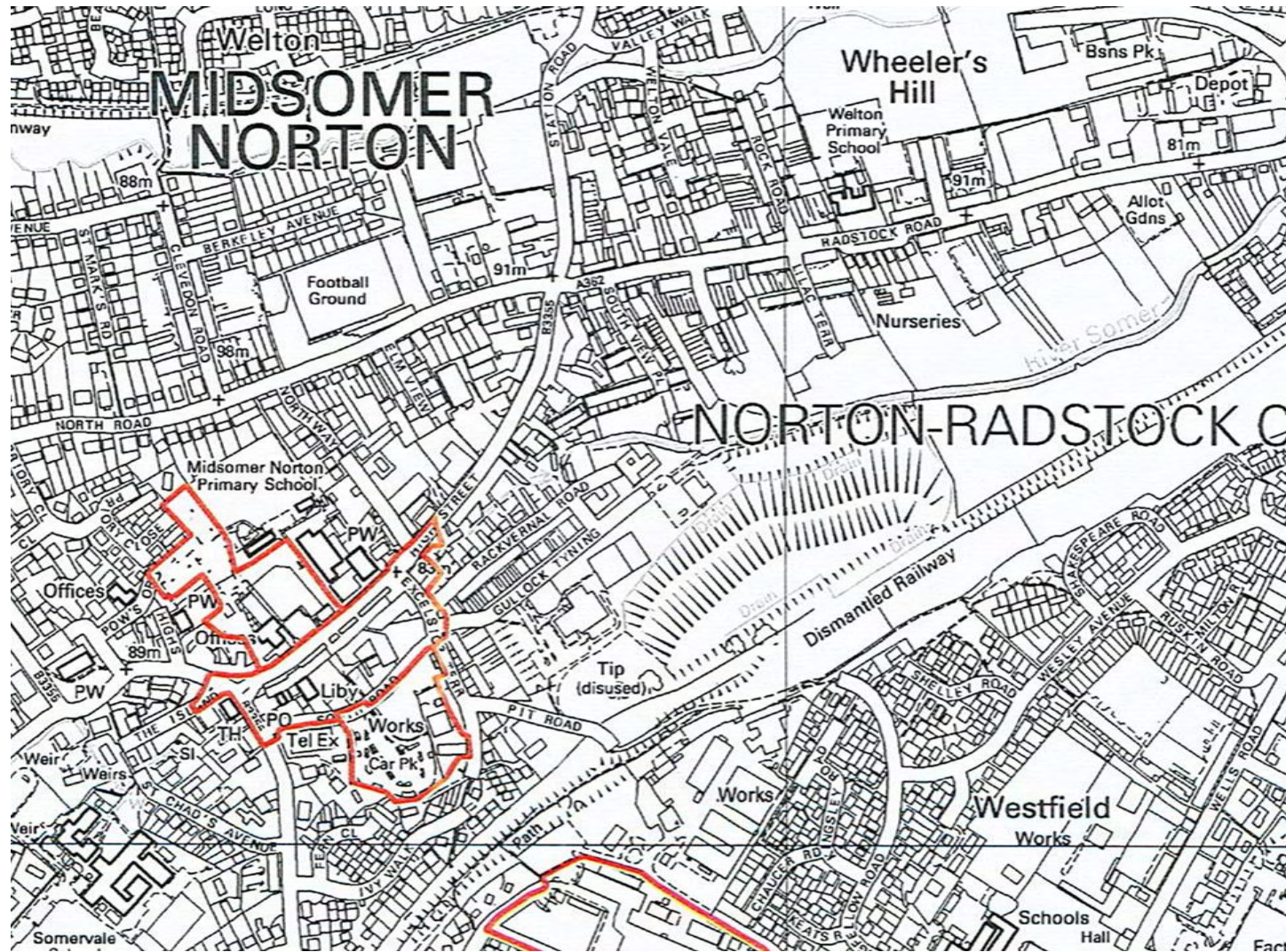


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Diagram 8: New Masterplanning Midsomer Norton Town Centre Strategy (extract)



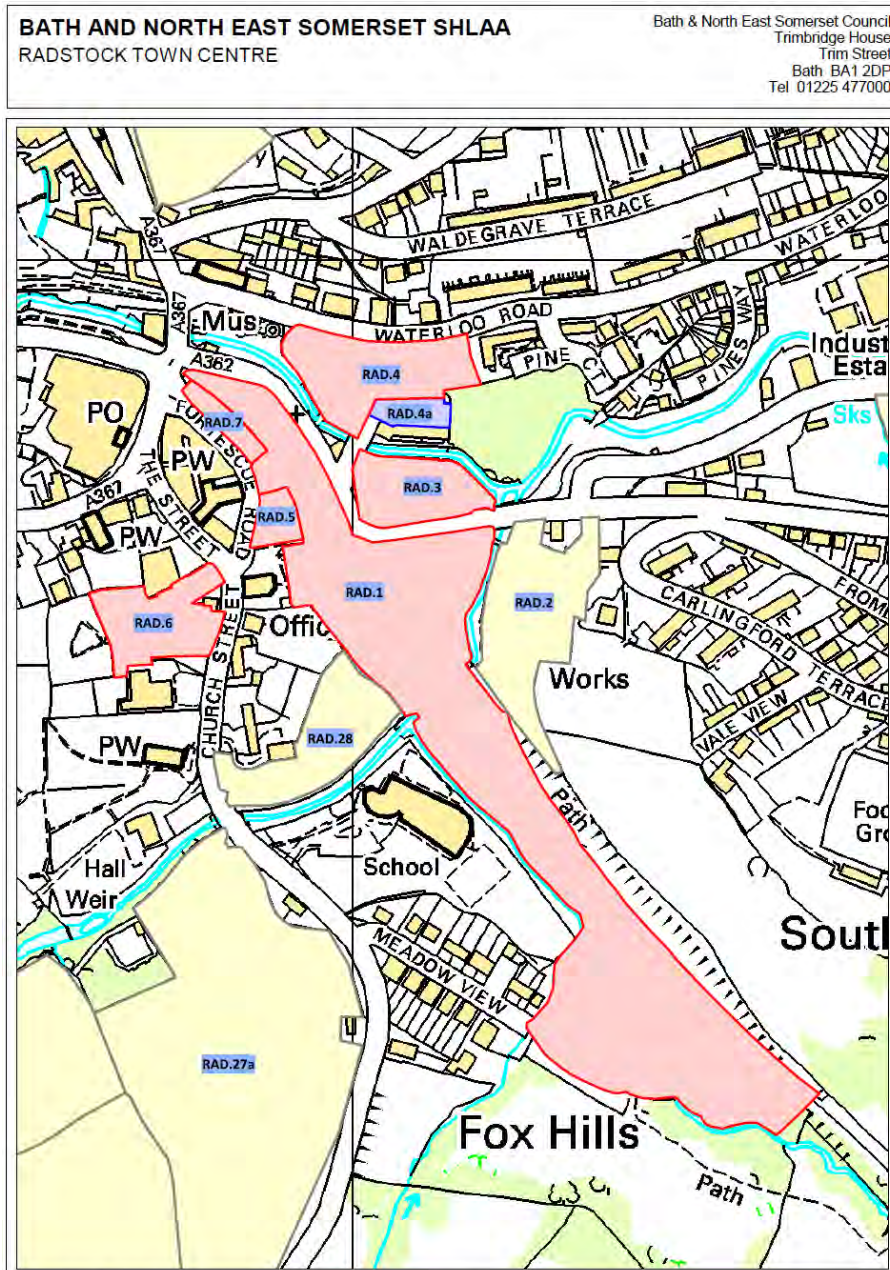
Diagram 9: Midsomer Norton Town Centre sites from the ERDP (CD4/E6)



Radstock Town Centre

45. The SHLAA identifies the capacity of 274 dwellings in the Core Strategy Policy SV3 area. This includes the upper part (139 dwellings) of the existing commitment of the Radstock Railway Land redevelopment (SHLLA ref RAD1: total 210 dwellings). Making improvements to the road network is seen as a priority to facilitate the delivery of development sites including the Radstock Railway Land development. The Council and Homes and Communities Agency (HCA) are investing a combined total of £1.2 million and public infrastructure improvements in Radstock will start in October 2011 and will take approximately 6 months to complete.

Diagram 10: SHLAA map for Radstock town centre



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46. Some SHLAA sites are partially located within flood risk areas 2 and 3a, therefore the Exception Test was applied (CD6/D2). The report concluded that about 40 homes cannot be accommodated in the sites entirely within FZ1 or FZ2. There are different levels of flood risk within the SHLAA sites considered. Therefore a sequential approach should be taken within the areas using the further information provided in the SFRA level 2 such as risk climate change, depth and velocity information.

Diagram 11: Radstock SFRA Flood Zones (CD6/D4)

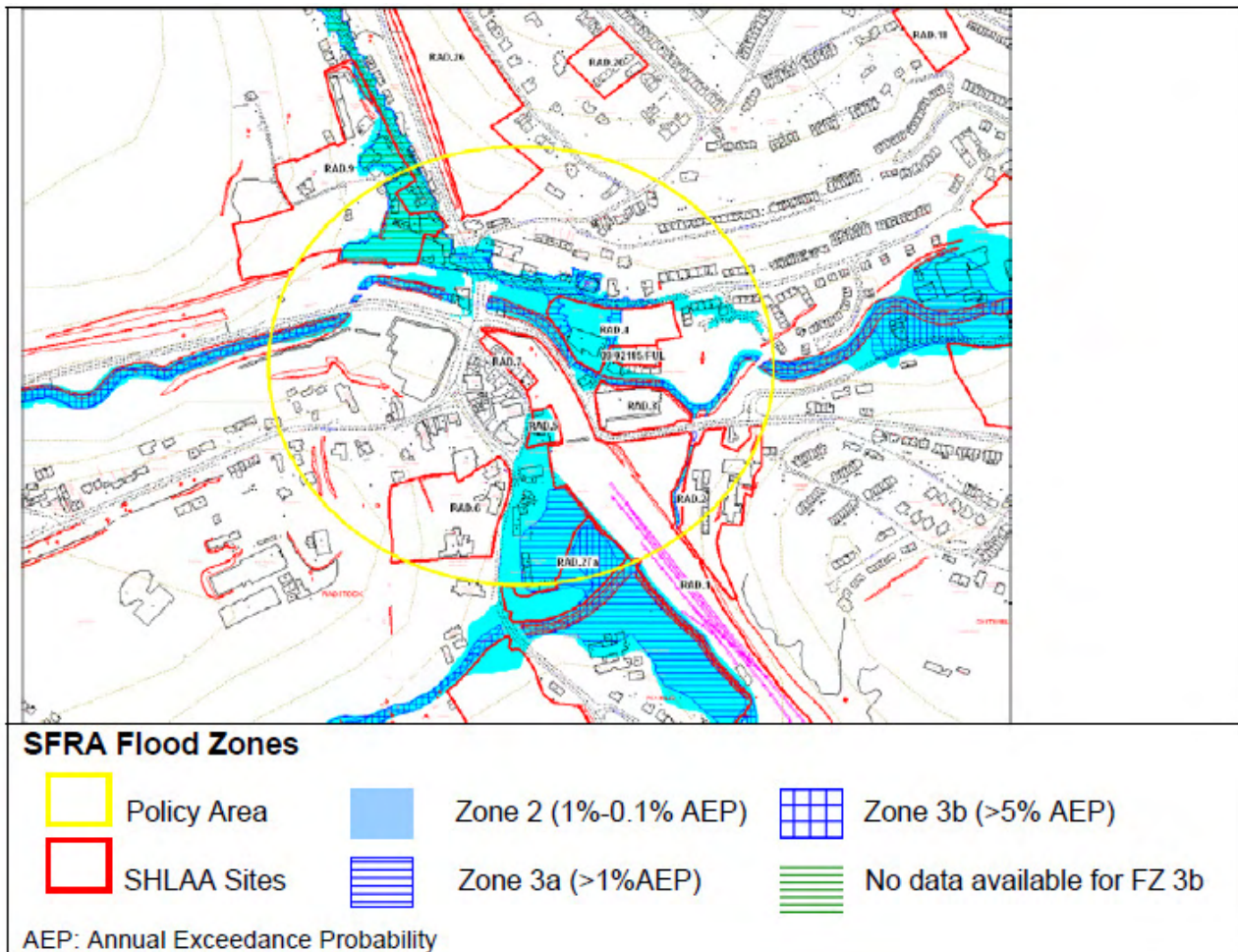
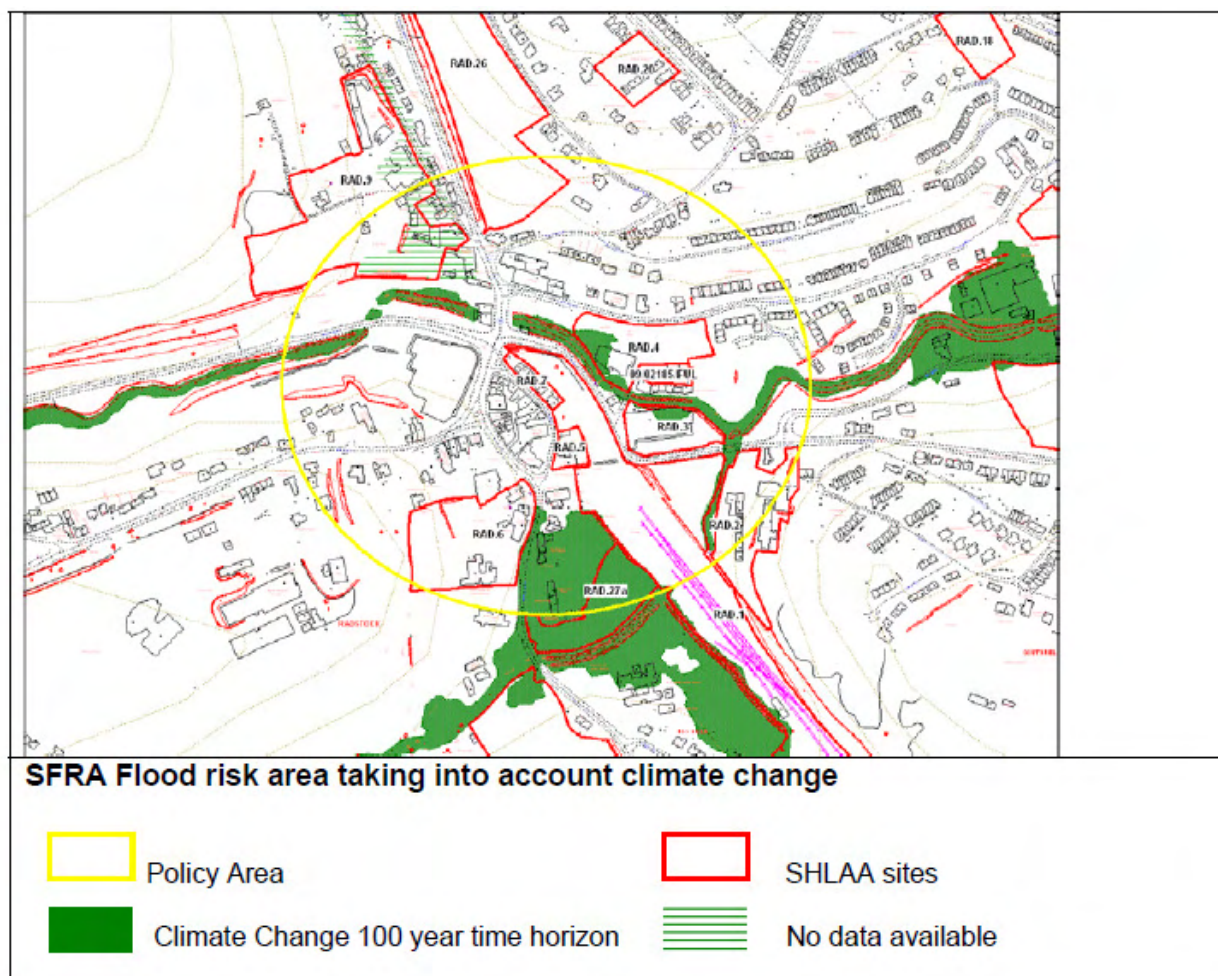


Diagram 12: Radstock SFRA Flood Risk area taking into account climate change (CD6/D4)



47. The Core Strategy Policy SV3 proposes a lower housing number (about 200 dwellings) than the capacity identified by the SHLAA. The Core Strategy vision sets out complementary roles for Midsomer Norton and Radstock Town Centres, providing employment opportunities, services and leisure provision for the communities in the Somer Valley area. Radstock will continue to provide a focal point for its local communities and realise its potential for tourism based on its green infrastructure, mining heritage, cycle ways and attractive rural hinterland. As explained in the paragraphs 39-41 above, residential development over and above existing commitments is only allowed where it brings employment or other community benefit. The most appropriate locations for new housing will be considered through the Placemaking DPD process taking into account wider sustainability issues including flood risk.
48. The Radstock Economic Forum led by the B&NES has started to prepare the Economic Development Action Plan for Radstock.

Old vacant industrial sites: Alcan (SHLAA ref MSN10. See the SHLAA map on page 15)

49. Whilst the existing Local Plan seeks to protect sites like these for employment benefits, it is acknowledged that a mixed use scheme with planning obligations to secure economic benefits is of greater benefit to the town. The SHLAA therefore reflects proposes 150 dwellings. The town council is working with the developer and a planning application was submitted for residential-led mixed use redevelopment in April 2011 which is currently under consideration. The proposal comprises the erection of 176 dwellings, community facilities, offices, town centre link, formal green space and associated works

Old industrial sites: Welton Packaging (SHLAA ref MSN9. See the SHLAA map on page 15)

50. This site is committed in the B&NES Local Plan for 100 dwellings as part of a mixed use scheme and discussions are underway with the landowner on the redevelopment of this site.