

From: Phil Harding
Sent: 09 January 2018 13:50
To: Local Plan
Subject: B&NES Local Plan 2016-2036 Issues & Options document - Response from Saltford Environment Group

Dear Sir/Madam

I am responding to the B&NES Local Plan 2016-2026 Issues and Options document on behalf of Saltford Environment Group (SEG).

SEG is aware of Saltford Parish Council that was agreed by the full Parish Council on 2 January and is in full agreement with the response made. This response from the Parish Council is set out below. SEG has expanded on the response at paragraph 14 (“**Does not account for the preservation of the loss to housing of valuable agricultural land and natural habitat (that supports agricultural land) in rural areas**”) by adding a new paragraph 14(a).

Saltford Parish Council response to B&NES Local Plan Issues & Options Consultation - January 2018 - as expanded at paragraph 14(a) by SEG

Green Belt Protection

01 The importance of Green Belt Land from planning (central Government & B&NES policy) and local sustainability perspectives means no Green Belt land should be lost apart from in very exceptional circumstances. It is essential that within the plan are clear policies and actions that BaNES will take to actively defend Green Belt land for current and future generations.

Transport and Housing

02 Road traffic capacity on the A4 through Saltford is exceeded at peak times during the day and in addition to the negative economic and social impacts the resulting air pollution in parts of Saltford has led to the necessity for Saltford to have an Air Quality Management Area.

03 It is therefore essential that appropriate and necessary transport infrastructure changes are made to reduce vehicles use on the A4 **before** any additional housing is planned for the area that would in effect place more vehicles on the A4 through Saltford or on other pinch points on the A4 route between Bristol and Bath.

04 A clear phased programme for traffic management must be shown in the plan.

Impact on Traffic numbers on A4 due to proposed new M4 Junction and A36/A46 link road

05 The proposed new M4 junction would be between the M4/M32 junction and the M4/A46 Bath/Stroud junction (J18) would attract more traffic and would make it a very accessible route for joining and leaving the motorway network for people

travelling from the west of Bath as it would cut out the need to travel through Bath. It follows therefore that a new junction would almost certainly raise existing traffic flows through Saltford and Keynsham for which we have serious concerns.

06 If plans for an A36/A46 link road were to go ahead that should divert heavy traffic directly to the motorway rather than through Bath and Saltford. We therefore support proposals for such a link road. It is essential therefore to show clear in the local plan that the impact of this proposed new junction has been fully considered and accounted for in respect of its impact on the A4.

Alternative transport options

07 The plan relies too heavily on road infrastructure for solutions. It does not take fully into account the existing transport assets throughout the region of disused rail corridors. Those corridors could be utilised for the shared and beneficial use of the whole of the Community, i.e. combining cycle/walking routes with LRT and thereby service and benefit more of the wider community.

08 In particular it does not appear to have assessed fully the potential benefits for re-opening of the GWR station existing at Saltford or placing a LRT system on the (former LMS) Bath - Bristol Sustrans cycle route.

09 We are seriously concerned that growth in vehicles associated with the additional housing proposed for the North of Keynsham will worsen the road noise and air pollution on the A4 through Saltford and Keynsham, particularly for example, the existing Air Quality Management Areas in Saltford and Keynsham.

Does not make provision of specific new sites for education, in particular secondary schools

10 Because of the importance that schools play in the choices that people make in where they want to live it is essential that as part of the Local Plan locations are shown where new school will be sited. It is important that these schools are placed close to population growth areas to limit the travel distances between homes and schools. Furthermore the siting of any new Secondary School (including Sixth Form) is an important factor as the large land footprint of the school and its facilities means that specific planning needs to ensure that sufficient land is earmarked for that purpose within any new housing development plans.

The Plan must make provision for local affordable housing across the County particularly in the Somer Valley

11 The Strategic Housing sites proposed in the West of England Joint Spatial Plan and its connection to B&NES Local Plan proposes no new larger scale housing developments for other parts of B&NES apart from that on the West side of B&NES. This rationale needs to be fully justified in respect of meeting the needs for additional affordable and social housing reasonably close to residents living in other parts of B&NES; of particular concern is the Somer Valley.

12 The Plans requiring people to move to the West of the Council where affordable housing will be built as part of the plan will force those needing affordable Housing away from the supportive structure of their family and relatives. No account in housing estimates appears to have been taken of the UK's decision to leave the European Union (BREXIT) and its effect on housing demand from reduced inward migration.

13 Over reliance on a 'predict and provide' approach when no measures are proposed to affect predictions is a cause for concern.

Does not account for the preservation of the loss to housing of valuable agricultural land and natural habitat (that supports agricultural land) in rural areas

14 Loss of agricultural land, and equally importantly the surrounding undeveloped land that provides the supporting eco system (biodiversity) to enable arable farming to succeed, should not be lost to housing development against a background of climate change and unsustainable and unmanaged population growth (at a national and international level). Due to increasing concerns for the nation's food security, any new development should have compensatory habitat but no such areas have been identified.

Additional paragraph 14(a) by Saltford Environment Group:-

14(a) 81% of B&NES is farmland compared to the national average of 57% yet only 5% of B&NES is natural or semi-natural land (heathland, natural grassland etc.) compared to a national average of 35% (data source: Dr Alasdair Rae, University of Sheffield, using Co-ordination of Information on the Environment (Corine) land use codes, 2017). Farmland requires the eco-system support (e.g. habitat for pollinating insects) of surrounding Green Belt and natural/semi-natural land to function. It would be irresponsible not to protect B&NES' natural/semi-natural land that underpins the economy of the B&NES and wider West of England area and our future food security in a changing climate made more critical by unmanaged population growth.

The Local Plan must show the importance of the protection of the surrounding Green Belt Land and environment location for the importance of recreational leisure and sports assets, particularly in respect of public health.

15 Saltford is important both in B&NES and regionally for its leisure, recreational and sports facilities. The siting of these facilities in Saltford is due to a major part because Saltford is surrounded by the Green Belt Land providing its setting and environment. This has proved important for their success and the benefits that these amenities and healthy life opportunities they bring to the population of B&NES.

16 These facilities include: Saltford Golf Club; Horse stabling and riding; National cycle routes; Bath to Bristol cycle path (also used by pedestrians); Saltford Lawn Tennis Club; Saltford Hall; Saltford Sports Club; Bristol Avon Sailing Club; Avon County Rowing Clubs; North Avon Canoe Club; Avon river leisure boating; Bristol Empire Dragon Boat Club angling; Scouting and Guiding; Saltford Walking routes etc.

Does need take into account the high importance of residential building extension in meeting housing need

17 For housing delivery statistics we recommend that account must be taken in respect of the 1,000s of square metres of habitable space which is brought forward by house extensions in the region on a continual basis as evidenced by successful planning applications. This extra space is provided without any additional land being taken.

18 These extensions produce a supply of bigger homes for large and growing families. This space is for the major part also quickly brought forward, building works often starting within weeks of approval.

19 Over time these larger houses can be invaluable to meet the needs of those families where mixed generations might want to live together. The additional rooms created can also be a future resource to help provide lodging for the growing number of university students in the region thus also providing an income for house owners.

20 Alternatively they and existing larger homes can provide householders with the ability to convert their property into a number of homes, for example after children have left home and/or when there is just a single house owner remaining in a large house. These homes could be converted to provide additional affordable housing to the housing market. A strategy to implement a scheme or schemes to encourage and assist such conversions should be considered in respect of meeting affordable housing need.

Must show proactive policies to prevent the loss of local amenities and jobs

21 In Saltford amenities and employment have recently been lost or threatened with closure. These include local Post Office, flower shop, B&NES library branch, Local Public House closed and loss of a take-away food premises.

Protection of archaeological sites and the importance of the rural villages close to Bath

22 Saltford's closeness to Bath and its historically important river crossing point on the Avon means that it has an archaeological importance for the area. Many archaeological finds have been found in the Green Belt land that washes over and surrounds the village revealing Saltford's significant archaeological heritage.

Does not account for the nuisance of airplanes overflying rural parts of B&NES travelling inward towards Bristol airport

23 This issue concerns airplanes that converge on the south side of Saltford where the higher elevation of this side of Saltford makes this a particular problem. The Local Plan should recognise the need to address this issue; the current plans for Bristol Airport expansion, for example, will only increase the number of planes flying over Saltford in the summer including many periods of the day when they fly over every 5 minutes and also many flights pass over after midnight.

[END]

Please confirm safe receipt of this response.

Yours faithfully

Phil Harding

PHIL HARDING MBE

Chairman

SALTFORD ENVIRONMENT GROUP

www.salfordenvironmentgroup.org.uk

From: Diane Shearn
Sent: 10 December 2017 13:30
To: Local Plan
Subject: Fwd: A WORD TO THE WISE POWERS THAT BE

Dear Planning Team,

I did attempt to "have my say" on your website, but sadly there were problems in submitting before I was able to do a spell check.

So..Planning, this is a plea for you to consider before changing our city yet more. The student accommodation that seems to be appearing at every available space has ,& is, transforming our Georgian city beyond all imagination. This is necessary for all associated with the university, but for residents who pay huge council tax, for little or no reward, it is becoming untenable. Areas of slum like conditions, traffic congestion & over half of the town concentrated on those who pay *no council tax* so that we, have to. Its not a case of "Not in my back yard" as I have a vested interest in Uni life having family & friends in higher education, but it is a case of Bath being transformed into an unrecognisable city.

Also ...shops !

How sad that there are so few small businesses anymore, the shops that bring people onto the city. Council tax/rates have become untenable for most hard working business to consider, & over the past 5 years our iconic shops have disappeared to be replaced by boarded up shops in every street,& if they are replaced by new tenants they are invariably replaced by the multi national who can afford the abhorrent rates/rents. Lets not forget the vital tourists who put massive coffers to the city when visiting.

Parking...on a daily basis I hear newcomers to the city, taking a deep breath of shock noting the high charges , almost on a par to those greedy towns which I no longer visit due to the parking fees.

Bus gates.

Bath has a complicated road system for the majority of visitors but the *bus gates*...catch people out mainly because the signs aren't high profile enough for unsuspecting visitors to realise they are there, & having spent a pleasant holiday in Bath how sad to find an unwelcome fine on there doorstep once they return home. I am in town several times a week & invariably manage to save on average 6-12 unsuspecting drivers the heartache of driving through the somewhat deceptive bus gates.

Lets not forget Pulteney - money-spinner -Bridge
The sign so many drivers fail to notice.

Police station...we have none.

Unbelievable that a city the size of Bath has no police station (I believe now Uni property,)& that our city, Radstock, & Keynsham has a total of 58 policemen at any one time.

There are numerous crimes in Bath, numerous beggars, many deserving of our money, but many being disruptive & threatening, drug dealing on the streets, there are shoplifters & other law breakers as is the norm, but what is not the norm, is to have no one to report it to.

We never see police patrolling streets as a comfort to those of us who live in & visit our town.

Traffic wardens...ah yes.

If we had as many police as we do traffic wardens eagerly waiting to add yet more coffers to the council, we'd have no problems.

Building

The Riverside !

was this rubber stamped perchance an enormous elephant in the otherwise unblemished beauty of Bath.

The view of this gigantic & growing white blot on the landscape is a warning of what could become even bigger.

The Mulberry Park project as per Combe Down, is creating a massive build up of traffic on this small area. Was infrastructure ever considered when giving the "Yes" to this massive construction ?

So a lot for you consider & these aren't this just my views.

Visit any local coffee shop. pub, shop bus stop, & you can overhear residents like minded to me.

You have so much to take pride in for enhancing our beautiful town, but don't let your brickbats outweigh your bouquets.

Will the residents who pay you, be listened to...?

I doubt it !

yours sincerely

Diane Shearn

Local Plan Consultation
Planning Policy
Bath & North East Somerset Council
Manvers Street
Bath
BA1 1JG

10 January 2018

Dear Sir or Madam,

**BATH AND NORTH EAST SOMERSET LOCAL PLAN 2016-2036
ISSUES AND OPTIONS CONSULTATION – WINTER 2017
REPRESENTATIONS ON BEHALF OF J.E. SHEPPARD AND SONS (SAWMILLS)**

We write in respect of the public consultation period for the Issues and Options stage of the Bath and North East Somerset Local Plan 2016-2036.

The Issues and Options document contains 21 questions, and this response provides comments on Questions 1 – 4 as set out below.

Q1. Have we identified the critical issues facing the District over the next 20 years?

The list of critical issues facing the District covers the main areas of concern, but there are some that have not been raised.

‘Housing affordability’ is referred to as a critical issue, but this does not cover other important housing problems. The geographical spread of where new houses are built is also a key issue. Provision of rural housing is an issue in the District which should be addressed.

Provision of new housing in the District needs to cater for the entire population’s needs, and market demands. The document concentrates on providing housing in central, urban locations, but there is no reference to housing in rural areas. The lack of new housing being built in rural areas is leading to a severe lack of supply which has the consequence of increasing house prices and affecting affordability.

Additionally, the list of critical issues does not correlate with the West of England Joint Spatial Plan (‘JSP’). Within the JSP, the first identified critical issue is ‘the need to substantially boost the housing supply’. This is not explicitly stated in the Issues and Options document, and should be included.

In light of the above, a new critical issue should be added as follows:

‘A lack of suitable sites in rural locations to accommodate new housing’.

Q2. Are the suggested spatial priorities the right ones?

Similarly to question 1, the spatial priorities cover the main issues, but there are some issues that are missing.

Within Table 1, section 4 relates to housing. There are three priorities within the housing section, but none of these specifically refer to new housing in rural areas. Given the reasoning set out above, the provision of rural housing should be added as a priority under section 4 of Table 1. The following wording would be suitable:

'Plan for the identification of suitable sites within rural areas to meet the housing need in these areas'.

Furthermore, within the JSP, there is a strategic policy which states 'to meet the sub-region's identified housing needs, in a sustainable way. In particular to make a substantial step change in the supply of affordable housing across the Plan area'. The next stage of the Local Plan should be amended to be brought into line with the JSP.

Q3. Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth? (Hierarchical, focused, dispersed)

We consider that the best approach to accommodating non-strategic growth is a combination of a focused approach and a dispersed approach.

The existing hierarchical approach does not work due to its strong focus on urban areas. This approach fails to address the need for housing in suitable rural areas. A combination of focused and dispersed would help to address the housing need across the entire District, as it would enable a focused approach in more urban areas (focusing new homes in a few key locations such as towns and larger villages), and a dispersed approach in rural areas (i.e. a range of smaller sites in suitable locations, i.e. on the edge of villages outside of the greenbelt).

Q4. Are there any other approaches/scenarios you think should be considered for accommodating non-strategic growth in B&NES?

In addition to a combination of a focused and dispersed approach, specific sites should be considered to accommodate new homes.

A suitable site for housing is in the village of High Littleton, in the south of the District. The specific site is located to the south of Greyfields Road on the western edge of the village. The precise boundary is outlined in red on the plan included with this submission. (Drawing Ref: BANES/HL/SLP). The site is not allocated for any particular use within the adopted local plan, and is not located within the Green Belt. There are no major habitat issues associated with the site, although a very small part is allocated as an 'Ecological Network' under Policy NE5 (EN), and a very small part is within a Site of Nature Conservation under Policy NE3 (SNCI). The site is also located within Flood Zone 1, so is at low risk of flooding.

Within High Littleton there are a range of local services including a primary school, pre-school, car repair garage, convenience store, newsagents, off licence, Post Office, hair salon, public house and a restaurant.

The village is served by three bus routes (83, 178, and 179) which provide regular services to areas such as Radstock, Midsomer Norton, Bath, Writhlington, and Farmborough.

As set out above the site is not located within the Green Belt so development would not be subject to a 'exceptional circumstances' test.

From a landscape perspective, the site is surrounded by wooded areas on the west and south, and is therefore not particularly visible from further afield. In light of this, the visual impact on the wider landscape associated with developing the site would not be considered overly adverse. The site is also located on the edge of High Littleton and so development of the site would be seen as a natural extension, rather than a separate, isolated development.

In line with paragraph 47 of the NPPF, as the site is under one ownership, is not previously developed, and has no major physical constraints, it is considered to be available and deliverable.

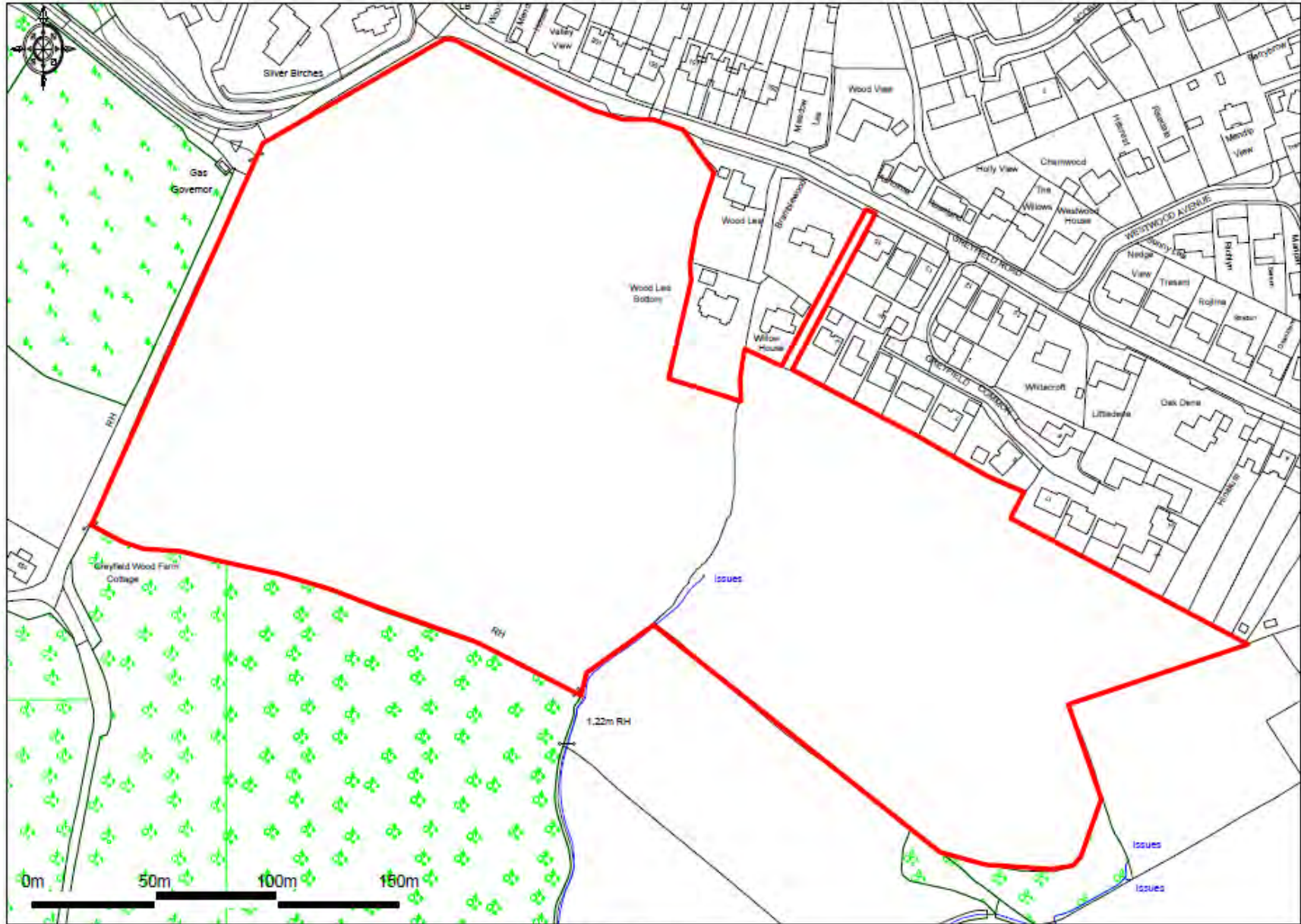
In light of the above considerations, the site should be considered as a suitable site to accommodate new housing and help contribute to the requirement for additional housing in the District.

We would be grateful if the above comments could be taken into consideration as part of the consultation process. Additionally, we request to be kept up to date in respect of the next steps of the Local Plan process.

Yours sincerely,

**PHILIP MARSDEN
ASSOCIATE DIRECTOR
FOR AND ON BEHALF OF CBRE LTD.**

Drawing Ref: BANES/HL/SLP



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BANES LOCAL PLAN 2016-2036
ISSUES & OPTIONS CONSULTATION

Q1. Have we identified the critical issues facing the District over the next 20 years?

We believe that one of the most critical issues facing the District in the next 20 years is the provision and affordability of housing to meet the fully assessed housing need for the District. Whilst we acknowledge that the Issues & Options Consultation rightly identifies the housing affordability issues in the District and the lack of social housing, the issue is whether the emerging Local Plan actually properly addresses the issue, unlike previous Core Strategies. If the housing crisis is to be addressed it is imperative that this Local Plan identifies sufficient deliverable land to accommodate the full objectively assessed housing need for the District.

Q2. Are the suggested spatial priorities the right ones?

It is agreed that probably the most important spatial priority is to meet future housing needs arising from a changing and growing population in the District. Whilst the spatial priority identifies 3 bullet points in addressing the housing issue, we believe that a further spatial priority is the identification of a range of green field sites which are capable of delivering new housing throughout the Plan period. At the moment the Issues & Options document is deficient in its response and should be amended.

Q3. Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth?

We note that paragraph 3.05 of the Issues & Options states that the following issues are being investigated: -

“Whether there are any available suitable and deliverable greenfield sites on the edge of the Somer Valley settlements and the rural villages not subject to Green Belt policy.”

Firstly, support is given to the identification of non strategic allocations for residential development. In particular we believe that land north of Kilmersdon Road, Manor Farm, Haydon is ideally placed to be identified as a non strategic allocation for circa 100 dwellings. The site is located next to the development boundary of Haydon and is not within the Green Belt, protected or valued landscape.

The site currently has a landscape setting of settlement designation. However, this designation applies to all sites on the edge of settlements and the designation does not preclude development merely seeks to ensure mitigation.

The Council’s SHLAA (2013) assessed both RAD 31c (3.8ha) (the site) as well as the larger site RAD 31b (12ha). RAD 31b was discounted as it was concluded: -

“Building on the entire 12ha field would likely to have a more significant impact on the contribution of this area to the setting of Radstock.”

The SHLAA identifies the site (RAD 31c) as having potential to deliver a yield of about 100 dwellings. It states: -

“In respect of the smaller area only (RAD 31c), development would have a low to moderate impact on landscape character. Whilst it would be seen from a distance, it would relate well to the rest of Haydon village on the ridge top.”

The SHLAA continues to state: -

“Development would have moderate impact on the houses opposite which are set back from the road and their front garden hedge restrict rural views; moderate impact from the road – the rural view is limited so loss will not be great; low to moderate impact on the view from the Clandown plateau as

development would relate well to the adjacent housing and existing vegetation partly conceals the area.”

Regarding design, the SHLAA states: -

“A design which is sensitive to the adjacent SSSI would ensure it was not harmed, neither directly nor indirectly. A design reflecting the layout and modest character of stone cottage opposite would effectively mitigate development by securing a scheme that would maintain local character and distinctiveness. Planting and an appropriate layout of houses at the new rural boundaries would effectively integrate the development into the surrounding landscape. The design should not make the new rural boundary the boundary of back gardens to take the control of planting away from residents.”

The SHLAA clearly assessed the landscape impact of developing the site and concluded that the development of the smaller site north of Kilmersdon Road would have a low to moderate impact on landscape character.

Furthermore, as part of the assessment of a recent outline planning application for up to 100 dwellings (15/01075/OUT), the Council’s Landscape Architect commented that they would not have any ‘in principle’ objections. Their comments were updated in September 2015 to state: -

“This brief additional response is intended to clarify my ‘no objection subject to conditions’ position. There will obviously be a change in character from an open field to a residential development and some loss of view. This will cause, in my opinion, only a limited amount of landscape harm.”

In view of the above, the landscape setting designation does not represent a constraint to development.

Finally, objections are lodged to the non-allocation of the site at Kilmersdon Road for residential purposes. The site is suitable for development and can be delivered immediately after planning permission is granted. It is a sustainable location being close to a range of facilities by non car modes. The objectors have carried out all the necessary technical and environmental surveys. There are no access constraints and the site can be adequately drained. There are no issues on the grounds of archaeology and the SSSI can be adequately

protected. Furthermore, there are no issues of ecological importance on the site. In all there are no constraints to residential development coming forward on the site. It is a sustainable, suitable and deliverable site.

10th January 2018



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VIA EMAIL ONLY

Dear Sir/Madam

Bath and North East Somerset Council Local Plan 2016 - 2036

Savills is instructed by the Society of Merchant Venturers (SMV) to submit representations in response to the Bath and North East Somerset ('the Council') Local Plan 2016 - 2039: Issues and Options Consultation Document (phase 1a), herein after referred to as the 'Issues and Options Paper'.

Specifically, this representation is made in the context of our client's substantial land interest to the south/south-east of Keynsham and we have attached a land ownership plan which illustrates the extent of that interest.

Whilst we are proposing an extensive urban extension to the south-east of Keynsham (in the West of England Joint Spatial Plan), we have also previously promoted a potential development of only part of the land at Uplands Farm – comprising some 250 dwellings together with a neighbourhood centre providing local services and facilities for the development and which could serve a wider area improving sustainability locally – see enclosed Indicative Concept Map.

National Planning Policy Context

The National Planning Policy Framework (NPPF) establishes that the purpose of the planning system is to contribute to the achievement of sustainable development. The three dimensions to sustainable development, as set out in the NPPF, require the planning system to perform an economic, social and environmental role. For plan making, Paragraph 14 of the NPPF, requires that Local Planning Authorities positively seek opportunities to meet the development needs of their area.

Paragraph 47 of the NPPF seeks to "*boost significantly the supply of housing*". The NPPF outlines that Local Planning Authorities (LPAs) should ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing. The Framework, at paragraph 52, confirms that the supply of new homes can sometimes be best achieved through planning for larger scale developments, such as new settlements or extensions to existing villages and towns.

Bath and North East Somerset Local Plan 2016 - 2039: Issues and Options Document (phase 1a)

The following section provides the SMV's response to the Local Plan Issues and Options Paper.

The Joint Spatial Plan Housing Requirement for B&NES

In conjunction with these representations, we have provided a response to the West of England Joint Spatial Strategy (JSP) Publication Consultation. In the previous consultation document it was acknowledged that the Strategic Housing Market Area (SHMA) evidence would be fully updated in September 2017 ahead of the JSP examination. The current consultation does not provide any update and therefore our earlier concerns in relation to the Councils' approach to the assessment of housing needs have not been addressed.

Draft Policy 1 states that the JSP will make provision for delivery of a total of 105,500 new homes. However, it is clear from a review of the housing requirement for the West of England that the Objectively Assessed Need (OAN) has been suppressed – indeed three alternative assessments prepared by Barton Willmore, Business West and the OAN based upon the methodology prescribed by the Local Plan Expert Group, indicate that the housing requirement for the West of England area falls within the range 130,000 – 150,000 dwellings. Furthermore, the Government has recently consulted on the new methodology for calculating OAN. The new formula for OAN demonstrates that across the JSP plan area the starting point for the housing need is c.116,480 dwellings.

Accordingly, the JSP in its current form fails to assist in accommodating the expected housing need for the JSP plan area over the plan period. There is clearly a greater requirement to release additional land (including Green Belt land) to meet the housing requirements of the West of England/Bath and North East Somerset in the most sustainable locations either via strategic development locations (more than 500 houses) identified in the JSP and/or non-strategic sites in the Local Plans.

Spatial Strategy Options

With regard to non-strategic sites, the Issues and Options Paper states that the Local Plan will need to deliver around 700 new dwellings over the plan period. However, as explained above, the overall housing requirement could substantially increase and therefore it would be inappropriate to determine a housing strategy for development within the Council's Local Plan before the housing requirements have been examined in the JSP.

Notwithstanding the above, it is clear that large scale extensions to the most sustainable settlements – including Keynsham – are the most appropriate locations at which to direct a significant proportion of the non-strategic housing growth in accordance with paragraph 52 of the NPPF. Extensions to the most sustainable settlements can be of a scale that ensures that the most efficient use of existing or proposed infrastructure can be made. The scale of such development can provide additional benefits in providing the resources, land or otherwise, commensurate with the need generated.

The Issues and Options Paper suggests that no sites would be allocated in the Green Belt unless it can be demonstrated that exceptional circumstances exist to justify removing land from the Green Belt and there is insufficient capacity in the sustainable locations on land outside the Green Belt.

However, there may be circumstances where land in the Green Belt immediately adjacent to the most sustainable locations - such as Keynsham - is more suitable than directing growth to less sustainable locations outside the Green Belt. Accordingly, it will be necessary to undertake a local review of the Green Belt boundaries at the most sustainable settlements, including at Keynsham.

We are of the firm view that the SMV's land at Uplands Farm does not significantly contribute to the purposes of the Green Belt and therefore should be released for development. Indeed from the West of England Strategic Green Belt Assessment it is clear that the west of Keynsham makes a major contribution to preventing merger of settlements (i.e. Bristol, Keynsham and Bath). In the corollary, growth to the south-east of Keynsham will not have the same substantial impact on that purpose of the Green Belt between Bath and Bristol as to the west of Keynsham.

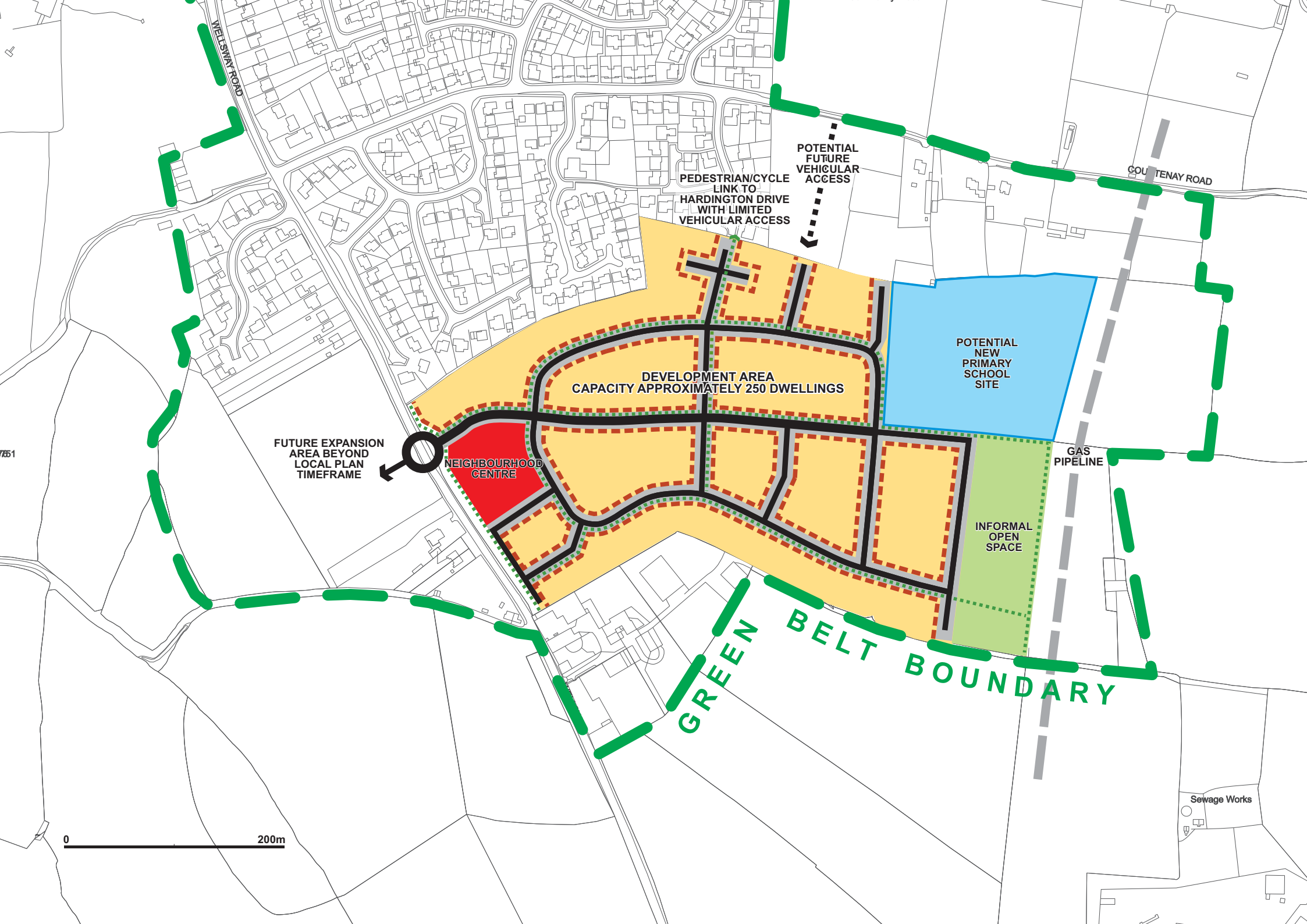


We trust the above comments clearly set out the SMV's position at this stage. The SMV would welcome discussions with the Council to discuss the opportunity of delivering development to the south-east of Keynsham.

Yours faithfully,



Gareth Johns BSc MSc MRTPI
Senior Planner



WELLSWAY ROAD

PEDESTRIAN/CYCLE LINK TO HARDINGTON DRIVE WITH LIMITED VEHICULAR ACCESS

POTENTIAL FUTURE VEHICULAR ACCESS

COURTENAY ROAD

DEVELOPMENT AREA CAPACITY APPROXIMATELY 250 DWELLINGS

POTENTIAL NEW PRIMARY SCHOOL SITE

FUTURE EXPANSION AREA BEYOND LOCAL PLAN TIMEFRAME

NEIGHBOURHOOD CENTRE

GAS PIPELINE

INFORMAL OPEN SPACE

GREEN BELT BOUNDARY

Sewage Works

0 200m

From: david redgewell

Sent: 08 January 2018 15:59

To: info@jointplanningwofe.org.uk

Subject: Comments from South West Transport Network on the Joint Spatial Plan - Publication Document Consultation and BANES local plan 2016-2036

We support the principle of housing growth in Policy 1 and 14500 BANES, 33500 Bristol, 25000 North Somerset, 32500 South Gloucestershire.

On Policy 2 we are concerned about sustainable transport access to Whitchurch, North Keynsham, Brislington, Buckover, Charfield, Coalpit Heath, Thornbury and Yate and in North Somerset Backwell, Nailsea, Banwell and Churchill.

We would rather that housing was provided at Ashton Gate, Long Ashton and Bishopsworth close to the City Centre.

The Ashton Vale land could be served by light rail to the airport or MetroBus. We would support a fixed link through this site from Temple Meads as a light rail/MetroBus or Overground route.

Regarding Churchill and Banwell they would need to be served by MetroBus from Weston and the airport.

With regards Policy 3 to affordable housing we would support 30% across the West of England.

In Policy 4 and Policy 6 on employment land we support employment land in Bristol, Bath and Weston but we are concerned about a lack of transport to Temple Quay/Temple Meads light rail/bus interchange.

Avonmouth lack of rail facilities to Henbury and Filton Enterprise area. Light rail is required between Emersons Green and Bath along the former Midland railway line with cycleway provision to link with the Bath Enterprise zone.

Summer Valley Enterprise Zone needs a rail link to Frome.

Junction 25 M5 needs a bus/rail interchange with coaches at Worle Parkway.

Bristol Port needs the Henbury loop and Portishead rail line for passenger services.

Bristol Airport needs a Metro link to Temple Meads and Bristol Parkway, Cribbs Causeway via MetroWest and a light rail link to Emersons Green via the Midland Railway corridor through Fishponds and Staple Hill to Yate with cycleway provision.

Thornbury and Yate require MetroBus links plus a future use of the Thornbury line for light rail to Yate.

Buckover requires MetroBus/bus to Thornbury, Bristol and Charfield station on the Gloucester line of MetroWest with a station at Stonehouse Bristol Road.

Kingswood, Clevedon require MetroBus links plus a link to Yatton station.

Policy 5 fails to address a clear plan for the public realm in Bristol, Bath and Weston Super Mare or proper health provision for new hospitals at Thornbury, Frenchay and Clevedon and growth at Bristol, Bath, Weston, Taunton and Gloucester as per MPPS.

Policy 7 concerned over a lack of transport to Keynsham North and a need for Saltford station.

Whitchurch Policy 7.2 requires Park & Ride, MetroBus to Hicks Gate, light rail link/MetroBus along the Callington Road link to the Whitchurch airfield development and bus services to Bath, Keynsham and the airport. We object to roadbuilding on the former North Somerset Railway corridor.

We are very concerned over the lack of joined up planning between the airfield site and Whitchurch village 2500 dwellings and the lack of a master plan. There is a lack of district centre and employment land.

Brislington needs Park & Ride facilities and light rail on the former North Somerset Railway corridor/MetroBus.

We are concerned over lack of regeneration of Brislington village shops and trading estate.

Policy 7.4 Backwell - support MetroWest to Nailsea and Backwell station and disabled access.

Policy 7.5 Banwell Garden Village and Policy 7.6 Churchill concerns over the lack of public transport access to these rural areas. Object to new housing unless bus services are vastly improved.

Support Policy 7.7 Nailsea location for housing.

Policy 7.8 Buckover requires new station, bus services and MetroBus.

Policy 7.9 welcome new station at Charfield and bus links to Bristol and Gloucester and Wotton Under Edge for employment.

Policy 7.10 improved bus service to Kingswood, Yate and Bristol and new railway station.

Policy 7.11 support 500 houses at Thornbury, new bus link to Gloucester and Bristol by MetroBus, Charfield station link and Thornbury branch line for light rail.

Policy 7.12 MetroBus to Chipping Sodbury and Yate and Bristol, MetroWest to Charfield, Gloucester and Bristol and light rail to Emersons Green, Bristol and Bath with cycleway.

Thanks

DAVID REDGEWELL SWTN

COMMENTS FORM

You are invited to comment on the Issues & Options document.

You are strongly encouraged to make your comments on-line via the Local Plan consultation portal www.bathnes.gov.uk/localplan

However, if you are using this form, please complete the form by filling in Part 1 with your contact details and use Part 2 for your response to the questions in the Issues & Options document. It would be helpful if you could complete a separate form for each question in the document you are responding to.

Please send your completed form(s) using email to local_plan2@bathnes.gov.uk. Alternatively you can post the form to Planning Policy, Bath & North East Somerset Council, Lewis House, Manvers Street, Bath BA1 1JG.

Your comments will be used to inform the next stage of the Local Plan preparation.

Part 1: Contact details			
Email is the Council's preferred method of communication and enables us to contact you quickly and efficiently. Please also provide a postcode with details of your address.			
Personal Details		Agent Details (if applicable)	
Title	Mr	Title	
First Name	James	First Name	
Surname	Stewart	Surname	
Job Title <i>(only if applicable)</i>	n/a	Job Title	
Organisation <i>(only if applicable)</i>	n/a	Organisation	
Email	[REDACTED]	Email	
Address	[REDACTED]	Address	
	[REDACTED]		
	[REDACTED]		
Postcode	[REDACTED]	Postcode	
Date	9/1/18	Date	

Part 2:

Which question in the Issues & Options document are you commenting on? 3 and 4.....

Questions relating to the options and paragraphs have been numbered in the document for you to refer to in your response.

2.2 Please make your comments as succinct as possible.

The comments form is being submitted by me on behalf of the residents of numbers 50, 52 and 54 St. Francis Road.

We believe that none of the options presented offer the best approach to developing land in the area. Our view is that the Council should be looking at smaller sites on the edge of Keynsham. One such small plot that we would like to put forward encompasses the buildings and gardens of 50, 52, 54 and possibly 56 St. Francis Road. The total area of this plot is 11845.31 square metres. 2945 square meters of this lies outside the green belt, the remainder is back gardens to these properties which is currently within the green belt. Harm to the green belt can be limited as the site has a clearly defined boundary line thus restricting any future expansion or urban sprawl.

The general public are unable to benefit or access this private parcel of land.

The site offers an opportunity to develop a sustainable, development which would not require residents to use the car. The development is within easy walking distance of Keynsham High Street and Keynsham railway station. It is 300 meters from the nearest bus stop and close to off road cycle routes, it is also within easy walking distance of local nurseries, primary and secondary schools This proposal has the support of Broadlands Academy.

The points raised in section 2.3 below give this site significant advantages over larger sites on the edge of Keynsham.

Please expand this box or attach a separate sheet if you require more space.

2.3 Are there any other comments you wish to make on the issues and options?

- 1. This site lies outside the flood plain.**
- 2. 915 metres from Keynsham High Street which includes a Tesco Supermarket and two pharmacies.**
- 3. 1km from Keynsham railway station with regular train services to Bristol, Bath and further afield.**
- 4. 300 metres from the nearest bus stop with regular bus services to Bristol and Bath.**
- 5. A secondary school, Broadlands Academy is situated next door to the site. An alternative site (Wellsway) is 2 km away.**
- 6. Nearest nursery school is located directly next door to the site and sits within the grounds of Broadland Academy (secondary school).**
- 7. 440 metres from nearest primary school, St. Keyna and alternative Primary school, St. Johns, is 670 metres away.**
- 8. Several Doctors and Dental surgeries 915 metres from site.**

Please note that names and comments will be published

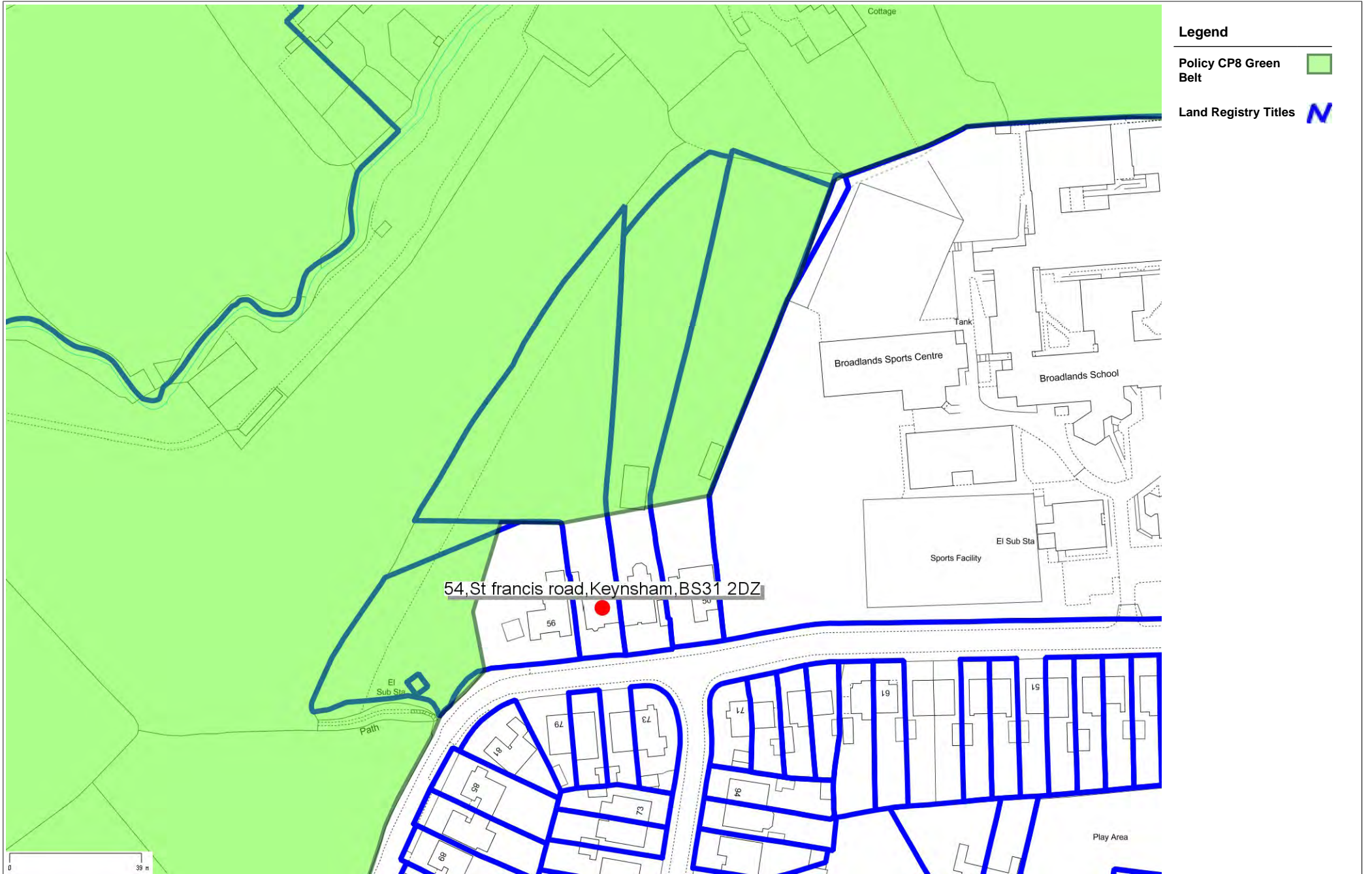
9. Two Veterinary practices also located 915 metres from site.
10. Keynsham library and Sports centre are 900 metres away from the site.
11. Sports fields, Keynsham Rugby and Keynsham football club are within walking distance.
12. Coffee shops, public houses, two hotels and three B&B's all within walking distance.
13. Three churches, (places of worship) within walking distance.
14. Under the Rent Charge Act 1977 ground rent charges have been redeemed on these properties.
15. Developers interested and provisional plans drawn up.

Please see attached three separate sheets.

Two showing site plans and one showing
aerial photograph and north facing boundary line. (for Q 2.3 only)

Please expand this box or attach a separate sheet if you require more space.

See our website for more information and to make your comments on-line: www.bathnes.gov.uk/localplan



Legend

- Policy CP8 Green Belt
- Land Registry Titles



Measure Distance and Area [X]



Click point coords

Easting	Northing	OS Grid Ref
364519.38	168682.33	ST645686
Latitude	Longitude	
51.4160393	-2.5115929	

Measurements *Linear (Miles) : Area (Sq M)*

Line Segment	Line Total	Area	Sq M
	0.139	2944.92	

Object editing tools

Object Type
POLYGON  

Close

Bath and North East Somerset Local Plan 2016-2036 Issues and Options Consultation

Representations on behalf of Strategic Land Partnership

On behalf of **SLP**

Project Ref: 40875 | Rev: AA | Date: January 2018



Document Control Sheet

Project Name: Development at Silver Street MSN
 Project Ref: 40875
 Report Title: Representations to B&NES Local Plan Issues and Options Consultation
 Doc Ref: Final
 Date: 9 January 2018

	Name	Position	Signature	Date
Prepared by:	Jo Lee	Associate		05/01/18
Reviewed by:	Colin Danks	Director		
Approved by:	Colin Danks	Director		
For and on behalf of Peter Brett Associates LLP				

Revision	Date	Description	Prepared	Reviewed	Approved

This report has been prepared by Peter Brett Associates LLP ('PBA') on behalf of its client to whom this report is addressed ('Client') in connection with the project described in this report and takes into account the Client's particular instructions and requirements. This report was prepared in accordance with the professional services appointment under which PBA was appointed by its Client. This report is not intended for and should not be relied on by any third party (i.e. parties other than the Client). PBA accepts no duty or responsibility (including in negligence) to any party other than the Client and disclaims all liability of any nature whatsoever to any such party in respect of this report.

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Figures

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1 Introduction

- 1.1.1 These comments are submitted on behalf of Strategic Land Partnership (SLP) and relate to the Local Plan Review Issues and Options document which will cover the period 2016-2036 and is currently being consulted upon by Bath and North East Somerset (B&NES) until 10th January 2018. It is noted that this consultation period runs over Christmas and as such does not accord with good practice in relation to the timing of consultation events and providing a fair and adequate opportunity for all to make comments.
- 1.1.2 Representation have been separately submitted, by Alder King, to the West of England Joint Spatial Plan (JSP). These representations should therefore be considered within the context of objection to the higher tier plan and specifically that the housing and employment figures are far too low to meet the objectively assessed needs for housing and employment development for both B&NES and the whole of the West of England and that as such far more housing and employment should be provided. We support the principle of the Local Plan review because the Core Strategy is clearly out of date in many respects. However, it is essential that the Local Plan Review compliments the JSP, and takes into account that there may be changes to it to provide an appropriate spatial strategy for the long term.
- 1.1.3 SLP have responded to all stages of consultation into the preparation of the Local Plan Review, including the Commencement Document last year and now set out comments below on the Issues and Options Part A document in relation to the vision and priorities, strategy and spatial development locations. We will be commenting on the Part B document when it is published in the Spring and wish to be kept informed of all stages in the process.
- 1.1.4 The timetable for the production of the Local Plan should follow the JSP and ensure that there is adequate flexibility within the timescale to ensure that any strategic changes can be properly included within this document, with adequate time for any updated evidence or consultation requirements.

2 Representations

2.1 Vision, Critical Issues and Spatial Priorities

Questions 1 and 2

- 2.1.1 The Core Strategy is out of date and it is essential that this is reviewed. We agree that the Local Plan should identify development opportunities and allocate sites to meet the whole range of needs in full. There are no overriding environmental constraints that would mean the LPA were unable to do this. A key role will be to set out the spatial strategy and the role of settlements. It is proposed that the Local Plan will replace the existing Core Strategy and the very recently adopted Placemaking Plan. It is important within this Local Plan that the key policies and allocations that support the growth of sustainable settlements are taken forward, such as the identification of safeguarded school sites and recognition of the need for enabling development to bring them forward.
- 2.1.2 While we recognise the benefits of a joined-up vision, the use of the 2020 Corporate Vision as the Local Plan Vision is not detailed enough to reflect the specific spatial and environmental characteristics of B&NES and specifically the roles of Bath and separately the very different roles of the towns in the Somer Valley. In particular, the latter have a functional relationship across the administrative boundary with Mendip District which is spatially relevant.
- 2.1.3 The Critical Issues identified in the document generally recognise the severity of housing affordability and inequality. However, specific reference should be made to the need to provide more affordable housing and specialist accommodation to meet the elderly needs which is another aspect of providing the right homes in the right places at the right time.
- 2.1.4 The Spatial Priorities do not recognise the need for affordable housing and therefore specific reference should be included to the provision of affordable housing and/or to the importance of reducing the affordability ratio as a key spatial priority. Currently the affordability ratio is 10.5 in B&NES
- 2.1.5 In the 2017 Housing White Paper, the Prime Minister's forward states:
- "Our broken housing market is one of the greatest barriers to progress in Britain today. Whether buying or renting the fact is that housing is increasingly unaffordable – particularly for ordinary working class people who are struggling to get by.*
- ... high housing costs hurt ordinary working people the most...*
- ... working households below-average incomes spend a third or more of their disposable income on housing.*
- This means they have less money to spend on other things every month*
- ... The starting point is to build more homes. This will slow the rise in housing costs so that ordinary working families can afford to buy a home and it will also bring the cost of renting down".*
- 2.1.6 This illustrates the importance the Government is placing upon establishing a lower affordability ratio which currently averages at 7.6 (and was as low as 3.6 in 1997).
- 2.1.7 Support is given to the focus on the Somer Valley Enterprise Zone, however this should be referenced throughout the document. Specifically, recognition should be given to the towns of Radstock and Midsomer Norton as good, sustainable locations for social, environmental and economic reasons to provide for development. They also serve the wider rural hinterland.

- 2.1.8 In recognition that the Somer Valley is now an Enterprise Zone there must be explicitly worded objectives and policies to develop this area as a strategic employment location. Job creation relies on an adequate labour supply which is influenced by both the availability and attractiveness of local housing and services to the market. It is essential that the Plan makes provision to specifically meet local needs which inevitably emerge as a result of the changing population structure, as well as to ensure adequate affordable housing and to support the Enterprise Zone. Indeed, the Local Plan must meet the objectively assessed needs of the Somer Valley for market and affordable housing, as well as for elderly and care accommodation. To meet these needs elsewhere would harm the ability of the Enterprise Zone to grow the local economy. It should also be noted that housing delivery plays its own role in the uplift of a local economy, not just through the build phase, but also associated services and facilities used by new residents. Housing makes a quantifiable improvement at a very local level; something that will not be achieved by directing growth elsewhere in B&ANES.
- 2.1.9 In planning for supported growth, the Plan must also make provision for infrastructure requirement such as schools and recognise that this will require the release of suitable green field sites to facilitate delivery. The Local Plan should recognise the important role of Midsomer Norton and Radstock and set out more detail in relation to how these towns will contribute to meeting the development needs that have to be met.

2.2 Evidence base

- 2.2.1 The Local Plan is being prepared in line with the West of England JSP, however the evidence in relation to the development needs in both the Wider Bristol Housing Market Area (HMA) and the B&NES HMA has not been tested and is subject to considerable and significant objections and representations. Not least there are submissions to indicate that the level of growth should planned should be significantly increased to maintain and encourage stable economic growth. As such, it is highly likely that true need for housing and employment will be much higher than is currently presented in that pan. Given the level of repeated objection from a range of sources and the fact it has yet to be independently examined, care needs to be taken when aligning with the current version of the JSP. In our view and in line with paragraph 216 of the NPPF, only very limited weight can be afforded at this stage. The Local Plan should therefore be developed to ensure that it has sufficient flexibility to adapt to any changes and specifically any likely increase in the housing/economic requirement. The National Planning Policy Framework (NPPF) is very clear about the need to plan positively. Paragraph 14 of the NPPF states that Local Plans should positively seek opportunities to meet the development needs of their area and meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. Indeed, one of the key tenets of the plan making section of the NPPF is paragraph 154:

“Local Plans should be aspirational but realistic...” [our emphasis]

- 2.2.2 It is agreed that the Local Plan cannot progress to submission until the outcome of the JSP is clear and given the volume and content of the objections it is likely that the timetable for this is could be considerably extended. It is important that the Local Plan Review is clearly based on robust evidence, and that the opportunity to provide improved services and adequate housing is not restricted by the JSP. That said, positive progress with the emerging B&ANES Local Plan, which encourages sustainable growth may help to bring sites forward early where there is no significant objection.
- 2.2.3 Having considered the evidence base prepared for this consultation, it is disappointing and a fundamental flaw that there is not more provided about the role and function of the Somer Valley and the designated Enterprise Zone. The Background Paper “Access to Services and Facilities in the Rural Areas” Winter 2017 only considers the rural settlements and updates information in relation to these areas. While we support the fact that the Somer Valley is recognised as a main urban area it is important to ensure that this area, and its main towns, is properly understood using up to date evidence. The larger towns, such as Midsomer Norton

and Radstock, play a very significant part in the existing and future economic growth of B&NES and will continue to have an important role and opportunity to provide sites for sustainable development.

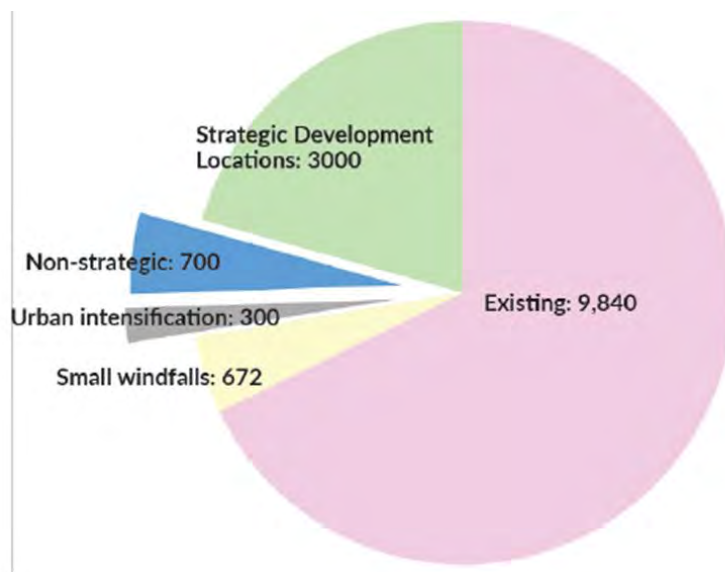
2.3 Emerging standardised methodology for the calculation of local housing need

- 2.3.1 The JSP has not been developed using the emerging standard methodology for the calculation of Local Housing Need and as such it fails to recognise an important element of Government thinking. By the time the Local Plan is being published there will be new national policy and guidance and a new methodology which Local Plans will have to use. It will be necessary to consider how the emerging Local Plan will take account of the development needs identified using the new methodology once it is set out in the revised NPPF, which we expect to be published this Spring.
- 2.3.2 It should also be noted that reference to local housing need is taken as meaning B&NES wide, including any necessary in-migration and not simply local affordable housing need.

2.4 Spatial Strategy Options

Questions 3 and 4

- 2.4.1 It is astonishing and a fundamental flaw that the Somer Valley does not feature as a development location within the JSP despite the fact that it is identified as an Enterprise Zone. Consequently, it is very important that this Local Plan does not repeat this mistake and makes adequate provision for this area in terms of future growth and the maintenance of necessary facilities and services. The Local Plan will also need to ensure the provision of appropriate housing is essential to the success of the Enterprise Zone. This is to provide for the attraction and retention of an adequate labour supply within the area.
- 2.4.2 The Local Plan focuses on how non-strategic growth will be delivered. This is currently identified as 700 dwellings, but in view of the issues identified above in relation to the JSP and the untested nature of the housing need and requirement evidence, this is clearly a minimum figure. Indeed, it is likely to be too low to properly represent the objectively assessed need for development, not least the considerable need for affordable housing. The figures being used in the emerging Local Plan, as set out in paragraph 1.3 of the “Access to Services and Facilities in the Rural Areas Background Paper – November 2017” and reproduced below, will require considerable scrutiny. We therefore reserve the right to assess these in detail at the next and future stages of the Local Plan process. We are concerned that they are not justified or deliverable and it is essential to consider whether:
- the existing commitment figures are accurate and deliverable and will all come forward;
 - the assumptions used to identify the small windfall figures are appropriate and robust; and
 - the urban intensification figure is justified and does not include any double counting.
- 2.4.3 No evidence is currently provided in the background documents included in this consultation about any of these sources of supply and the sites that make them up. Given that these sources make up over $\frac{3}{4}$ of the housing requirement, it is essential that these are properly tested. Detailed evidence and trajectories should be published to allow such detailed scrutiny. It is as much the Local Plan’s role as it is the JSP’s role to ensure that objectively assessed housing need is provided for and delivered; including the need to maintain a 5-year land supply within the B&NES HMA.



- 2.4.4 We support the investigation of available, suitable and deliverable greenfield sites in sustainable locations on the edge of the Somer Valley settlements, as set out in paragraph 3.05. The Somer Valley is the least environmentally constrained part of B&NES and its towns provide opportunities for growth which would support the identification and ultimate success of delivering the Enterprise Zone. It is also important to realise that employment can be generated by uses which are not necessarily confined to employment land, this included uses such as care homes and schools which are required to provide necessarily services for the expansion of the town.
- 2.4.5 The Issues and Options document should recognise the importance of the Somer Valley and Midsomer Norton and Radstock in particular as the principal town serving the whole of the Somer Valley and which plays an important role serving the wider rural hinterland. It is necessary for the Local Plan to positively plan for the future of the towns, recognise the role they play and their attractiveness to the market and first time buyers and ability to deliver much needed houses for local people at more affordable prices than Bath.
- 2.4.6 Growth here would be highly sustainable, being less environmentally sensitive than Bath yet benefiting from good transport and infrastructure provision. Development would also be consistent with the Placemaking Plan objectives. The Local Plan Strategy should ensure that the key growth strategy elements are taken forward, specifically it should recognise the allocation of a safeguarded school site at Silver Street, Midsomer Norton which can be delivered, together with the provision of improvements and benefits to pedestrian and cycle connections from here and the South into the Town Centre (through enabling development in this part of the town). This is consistent with the ambitions of the Secretary of State for Education for a new free school, B&NES Council and the Town Council and would provide sustainable development in a suitable, available and achievable location.
- 2.4.7 It is currently unfortunate that in terms of services, facilities and public transport provision the settlements of Midsomer Norton and Radstock, are not included within diagram 6. This is a consequence of the fact that there has been no updated assessment of the towns in the Somer Valley as discussed in paragraph 2.2.3 above. Rectification of this would illustrate their sustainability strengths and importance to the wider area.
- 2.4.8 It is essential that the housing market area and functional economic area are properly considered, and cross-boundary relationships are clearly understood. It is disingenuous not to properly consider the relationship with Mendip and the links that exist between the Somer

Valley towns and the Mendip towns and villages. The document is wholly silent on the relationship areas have across their administrative boundaries. B&NES is not an island and it is essential that proper cross boundary working takes place to recognise the functional relationships which exist and the links that exist. It is essential that the emerging Local Plans, (this one and the emerging Mendip Local Plan Part II which is currently being consulted upon), work together to address the local needs. Villages within north Mendip are clearly well related to the town of Midsomer Norton and there is an important functional relationship which exists.

- 2.4.9 Given the often arbitrary nature of historic Local Authority boundaries, the most suitable location for growth of Midsomer Norton and Radstock, is to the South on land at Silver Street and then into Mendip at White Post and hence the need for the Duty to Cooperate to be properly applied and carried out. B&NES has demonstrated co-operation at a strategic level with West of England Partners and at a local level it needs to do the same through the emerging Local Plan. Therefore, coordinated and rigorous cross boundary working should take place which deals with this area as a contiguous entity and sets a comprehensive strategy because the operation of the town is not constrained to its administrative boundaries.
- 2.4.10 The Local Plan consultation sets out a number of options for accommodating non-strategic growth and is right to investigate whether there are suitable and deliverable greenfield sites on the edge of the Somer Valley settlements. The sites at Silver Street Midsomer Norton, as identified in the Housing and Economic Land Availability Assessment Winter 2017 (reference MSN31D and MSN32A) are suitable and deliverable and as such would be entirely appropriate for allocation to meet development needs.
- 2.4.11 Option 1 continues the existing hierarchical approach to new development. This is supported because it seeks to direct development to the most sustainable locations. Midsomer Norton is a key town that provides a good sustainable location for growth because it has one of the best access to employment opportunities, facilities and services. An approach which focuses on Midsomer Norton is likely to be consistent with planning policy and guidance as set out in the NPPF and NPPG. It is noted that this options performs best in terms of the Sustainability Appraisal, which is discussed further at paragraph 2.6.1 below.
- 2.4.12 Option 2 seeks to focus growth on a few key locations. This is also supported because it can ensure that sites are developed which facilitate infrastructure, open space, school and improved pedestrian and cycle routes. There are available, suitable and achievable sites on the edge of Midsomer Norton, which will support the delivery of the new allocated primary school site and also provide improved connections into the town centre. An approach which focuses on Midsomer Norton and Radstock as a key Enterprise Zone location is likely to be consistent with planning policy and guidance as set out in the NPPF and NPPG.
- 2.4.13 Option 3 sets out a dispersed approach which is not supported because it is less sustainable and not likely to deliver accessible and sustainable development or support the level of technical, social and economic infrastructure that would be required. It is noted that this option performs least well in terms of the Sustainability Appraisal for good reason.
- 2.4.14 It is noted that diagram 8 is illustrative and does not represent the B&NES administrative area and does not provide an accurate representation of the area or its settlements.

2.5 Housing needs and student accommodation

- 2.5.1 Given the significant increase in the population age 20-24 the has occurred and the expectation of continuing trends the Council is right to properly consider the issues of students and the impact University growth will have on the housing market and existing housing stock. It is essential that the future student numbers and accommodation are properly planned for within the Local Plan to ensure that general housing remains available to those that need it and that as such adequate quantities of housing land is provided for general housing to meet the full housing need. If there is pressure on land in Bath for student accommodation, then it may be necessary for more housing land to be provided across B&NES administrative area to

ensure an adequate supply to meet the general needs. Whatever option is chosen it is essential that adequate provision is made for housing future students and that any purpose build student accommodation is not counted towards the general housing supply in any five-year land supply calculation.

2.6 Sustainability Appraisal

- 2.6.1 The Sustainability Appraisal is at the very early stages and does start to assess the effects of the early options put forward. However, there are a number of anomalies. While the text summary is virtually the same for each option, it is important to note that there are clearly more positive benefits to be achieved through the progression of Option 1, which is recognised as directing new development to “the most sustainable locations”. Indeed, this option scores “++” in relation to the significance criteria for each of the objectives 1 to 5. The text should reflect this more positive scoring than the other options and this should be amended both in Appendix 1 and also in paragraph 5.6 on page 9 of the SA Interim report.
- 2.6.2 The exact distribution of any sites will be important to ensure that any potential negative effects are mitigated against, specifically in relation to the impact on historic, built and natural environment. It is clear that this could be suitably addressed through the appropriate identification of sites, such as the development to enable the delivery of the safeguarded school site at Silver Street, Midsomer Norton.
- 2.6.3 We note that in Appendix 1 on page 7, the text for objective 8 for Option 3 refers to a negative impact but does not have a negative within the significance criteria notation. It is presumed that this is an error, but it is important that this is rectified at this early stage to ensure that the scores are not erroneously carried forward. Consequently, the Sustainability Appraisal should be carefully checked and the conclusions in respect of the options should properly reflect the tables and the scoring of impacts that has been undertaken.

3 Conclusion

3.1 Summary

- 3.1.1 The Local Plan 2016-2036 Issues and Options document is a reasonable start to the process of review and preparation of a new plan. However, while this consultation starts to ask the right questions and investigate different options it does not provide adequate evidence on which to base the judgements that are to be made. Further detailed evidence is required to justify the position in relation to the land supply and housing requirement figures and also to update the role and function of the larger towns, particularly in the Somer Valley. The Plan must respond to the JSP in full and a greater level of certainty is needed about that process and its outcomes.
- 3.1.2 The preferred option to be taken forward should be to direct development to the most sustainable locations, such as Midsomer Norton and Radstock, which would support the delivery of the Enterprise Zone objectives and provide continuing support to employment opportunities, facilities and services. Sites that are coming forward, such as the land at Silver Street Midsomer Norton, which will enable the delivery of a new school and improved pedestrian and cycle links into the town should be supported and included within the new Local Plan preferred options and there should be no delay enabling their development.
- 3.1.3 The growth of students should be carefully considered and the preferred option should ensure that adequate student accommodation is provided to ensure that there is no adverse impact on the supply of housing or housing land which is necessary to meet the general housing needs of the population.
- 3.1.4 The Sustainability Appraisal is inconsistent and contains errors in relation to the significance criteria for Option 3 and the write up for Option 1. The summary for Option 1 does not properly reflect the major positive impact that is identified in the significance criteria for each of the first five objectives. This should be amended to properly ensure that the text accurately reflects the impact assessment.
- 3.1.5 Peter Brett Associates on behalf of Strategic Land Partnership wish to be kept informed of all future stages of the preparation of the B&NES Local Plan and would welcome an opportunity to discuss the content of these representations with the LPA at an early stage to help shape the emerging plan.

AJB/BRS.5718

10th January 2018

Planning Policy
Bath & North East Somerset Council
Lewis House
Manvers Street
Bath
BA1 1JG

BY E-MAIL ONLY

Dear Sir/Madam

**BATH & NORTH EAST SOMERSET LOCAL PLAN 2016-2036: ISSUES & OPTIONS
LAND AT CHURCH ROAD, PEASEDOWN ST JOHN**

I write on behalf of my clients Strongvox Homes Ltd to respond to the current Bath & North East Somerset Local Plan 2016-2036: Issues & Options Consultation. Strongvox Homes have a 'non-strategic' land interest at Church Road, Peasedown St John. My client's response is set out fully within the enclosed report.

At the appropriate time my client's would wish to take a full part in any subsequent examination in public.

Yours sincerely



Alex Bullock
Principal Planner
e-mail: alex.bullock@pegasusgroup.co.uk

Enc. BANES I & O Reps

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BATH AND NORTH EAST SOMERSET LOCAL PLAN 2016-2036:

ISSUES AND OPTIONS CONSULTATION

STRONGVOX HOMES

CHURCH ROAD, PEASEDOWN ST JOHN

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PLANNING | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

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1. INTRODUCTION

- 1.1 These representations are made on behalf of Strongvox Homes, who have a 'non-strategic' land interest at Church Road, Peasedown St John.
- 1.2 The BANES Local Plan 2016-36 Issues an Options Document has been published for consultation alongside the Publication Joint Spatial Plan for the West of England 2016-2036 (JSP). Due to the division of labour between the JSP and the BANES Local Plan, the issues and options consultation begins to set out concepts for the precise planning of the strategic development locations that the JSP identifies within BANES (North Keynsham and Whitchurch). It also represents the beginning of the process to determine apportionment of 700 dwellings on non-strategic sites, allocated to BANES.
- 1.3 Appended to these comments are our representations on the Publication West of England JSP. The examination of the JSP will determine whether the overall housing requirement, and for BANES specifically, remains as proposed. Brownfield supply will be tested, as will the deliverability of the package of strategic development locations, and the balance between strategic and non-strategic growth. We do not repeat those representations here but they lead to the conclusion that for a number of reasons a greater degree of non-strategic growth may well be an outcome of the examination of the JSP.

APPENDIX 1: REPRESENTATIONS ON THE PUBLICATION WEST OF ENGLAND JOINT SPATIAL PLAN 2016-2036

- 1.4 It is understood that after this initial Issues and Options consultation (phase 1a) there will be a further element of Issues and Options consultation (phase 1b) in Spring 2018. This will cover other place-based issues and Development Management policies. Following consideration of comments on both these consultation phases, as well as further assessment work, the Council will publish its Preferred Options for consultation in Summer 2018. This will encompass greater detail on the strategic development locations, as well as smaller site allocations. The Local Plan timetable foresees a Regulation 19 consultation in Autumn 2018, with examination in Spring 2019. This timetable seems to be predicted on the JSP, as it affects BANES, being found sound with little modification, which is unlikely, based on the experience of strategic plans around the country.

- 1.5 Focusing in the period to Summer 2018, we request that the evidence base (not least the revised HEELA) is published for consultation prior to the publication on the Draft Plan.

2. SPATIAL STRATEGY OPTIONS

- 2.1 The 'Spatial Strategy Options' section of the Issues and Options consultation explains that a key role of the new Local Plan will be to establish how the JSP's emerging 'non-strategic growth' requirement for BANES of around 700 new homes will be delivered. Paragraph 3.06 suggests that the Council proposes site specific allocations to achieve this, as opposed to criteria based policies based on broad locations. Strongvox Homes supports this more pro-active and certain approach.
- 2.2 It is the case that after two rounds of Plan-making (the Core Strategy, adopted June 2014, and the Placemaking Plan, adopted July 2017) that the Council failed to identify sufficient housing land to deliver the housing requirement 13,000 homes by 2029. Consequently, Strongvox Homes encourages the Council to plan in full to 2036 within the new phase of plan-making.
- 2.3 The Issues and Options consultation demonstrates that the Council is clear that it must maximise sustainable development opportunities outside the Green Belt before seeking to justify exceptional circumstance for the removal of land from the Green Belt. This is uncontroversial. The authority on this is set down, not only in the NPPF but in *Calverton PC v Nottingham City Council High Court & Ors [2015] EWHC 1078 (Admin)* (21 April 2015).
- 2.4 Mr Justice Jay set out the following five matters for consideration to lead to the planning judgements as to whether there are exceptional circumstances with regard to the release of Green Belt land through the local plan process in a particular case having determined the objectively assessed need (para 51):
- *the acuteness/intensity of the objectively assessed need;*
 - *the inherent constraints on supply/availability of land prima facie suitable for sustainable development;*
 - *the consequent difficulties in achieving sustainable development without impinging on the Green Belt;*
 - *the nature and extent of the harm to the Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and*
 - *the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.*

2.5 Determining what is the maximum level of development that would constitute sustainable development south of the Green Belt in BANES in the present plan-making context is a matter of planning judgement. This should have regard to access to employment opportunities (current and forecast) both in the immediate area and also the connectivity that is available to Bath, Keynsham and Bristol, and indeed Frome, in Mendip. In our assessment, the task at present (700 dwellings on non-strategic sites) strongly suggests that most, if not all, of the need for non-strategic greenfield development could be accommodated in non-Green Belt locations, subject to:

- The availability, suitability and deliverability of sites;
- The level of social infrastructure (notably primary school places) or availability and sustainability of land for accommodating growth.

2.6 It is likely that a very high proportion, if not all, of the non-strategic requirement will be sourced from greenfield sites. The evidence base behind the JSP presents an urban intensification allowance for large sites in Bath, and makes a District-wide allowance for small additional windfall sites¹ post 2029. No urban intensification allowance is presented in the JSP evidence base for large sites elsewhere in BANES, e.g. within the existing urban area of Keynsham or Radstock, and if such sites can be identified these would contribute to the non-strategic requirement of 700 dwellings.

2.7 However, it seems likely that if there was the requisite level of confidence in such supply, it would have been relied upon within the housing trajectory to 2029 during the examination of Placemaking Plan. Whilst occasional brownfield windfall sites (of over 10 dwellings) have been permitted since the adoption of the Placemaking Plan it is unlikely that circumstances have changed so much so as to reveal new specific sites that can deliver 2029 or 2036. Although, it is acknowledged that circumstances may change during plan preparation during 2018.

¹ 9 dwellings or less

2.8 Against this background, Strongvox Homes notes the three broad options that are presented for the apportionment of 700 dwellings, namely: -

- 1) Continuing the existing hierarchical approach with development directed to the most sustainable locations outside the Green Belt where access to employment opportunities, facilities and services, as well as to public transport is best. The consultation states that this could include locations within Keynsham, at Midsomer Norton, Radstock and Westfield in the Somer Valley, and at certain larger villages outside the Green Belt with access to key facilities and services (including a primary school with capacity/scope to expand). Beyond that, it is said that other smaller non-Green Belt villages could accommodate a lower proportion of the growth.
- 2) Focussing development at a few key locations, such as on the edge of the towns; or at two or three of the larger villages. These could act as the focal points for future housing development without the need to allocate sites at the smaller less sustainable settlements.
- 3) A more dispersed approach allowing a range of smaller sites across the District at a greater range of settlements, large and small. This could include sites at all settlements outside the main urban areas.

2.9 Given the current scale of the task (700 dwellings), Strongvox Homes rejects the need to identify sites at the least sustainable rural settlements in BANES.

2.10 Such settlements would receive some development under Option 1 and 3. Therefore the realistic options are a modified Option 1 or Option 2. Clearly, the Council regarded Option 1 as the most appropriate approach during the preparation of the Core Strategy (when the scale of the task was larger). To deviate from Option 1, the Council needs to present reasons explaining why this is no longer a sound approach. The scale of the task can form part of that reasoning, but it is very clear from the tone of the Issues and Options document, that the future co-planning of housing development with the availability of primary school places is a key driver of the current plan-making process. Core Strategy growth has pushed primary school capacity to its limit in many villages in the south of the district.

- 2.11 On this matter, we are concerned that there is no settlement classification policy in the BANES Core Strategy i.e. there is no 'absolute' rural settlement hierarchy based how settlements currently perform/function and are linked to the public transport network. The RA.1 and RA.2 policies are not a direct substitute for this. They define places based on their capacity to receive development (with primary school capacity being a high-profile variable). However, already very sustainable rural villages would be excluded from RA.1 status if the school was full and could not be expanded. Indeed, on the Council's logic, this would (and indeed) does deny any recognition of a village's current role in the life of the district. We suggest that the Council combines a 'growth neutral' classification system, with additional polices then governing growth to ensure an objective assessment of the baseline sustainability of locations, and subsequently their growth potential.
- 2.12 Clearly, Midsomer Norton, Radstock and Westfield represent the core urban area outside the Green Belt and this area can be expected to receive a meaningful share of the housing requirement. This share might however be tempered by likely development effects in respect of Policy NE2A (Landscape setting of settlements).
- 2.13 We note that Diagram 6 of the consultation only refers to primary school capacity/expansion issues at villages and does not refer to the towns of the Somer Valley. It assumed that even if they face the same issues as some villages, that primary school places would not be regarded as a barrier to growth i.e. a solution would be found.
- 2.14 It is interesting to note that Option 1 breaks up the concept of a Somer Valley policy area (Core Strategy Policy SV1) and refers only to Midsomer Norton, Radstock and Westfield and not Paulton & Peasedown St John. We question whether this is a signal that Paulton & Peasedown St John will be separated from a future Somer Valley Area and, if so, whether they would become RA.1 villages given their scale, or form a new layer in the settlement hierarchy. Again, any deviation for the adopted Core Strategy so soon after its adoption would need to be clearly justified.
- 2.15 The difference between Option 1 and Option 2 is due in large part to a difference in the approach to the role of larger villages. Option 1 seems to enable all larger villages to grow, yet would target one village for primary school investment. This would mean the Council having to relax its RA.1 approach and allow travel between villages to access primary education. This would represent a move away from the current idealised approach of Policy RA.1, but this would not be unsound. By contrast, although Option 2 might also require a new primary school at one larger

location the host village would be targeted for a greater degree of growth, and surrounding feeder villages to the school would be targeted to a lesser degree. Villages outside the catchment would seemingly receive no growth.

2.16 Either way there will need to be some degree of relaxation to Policy RA.1. If a new school is identified in one village, there is a limit to the amount of housing development that the JSP would allow to support it (499 dwellings) and the reality of the BANES Local Plan strategy might result in a lesser figure. Generally, 700 dwellings would be considered to generate 210 pupils (a new 1FE school). We submit that for that investment to be used efficiently, it will have to receive pupils from at least 201 new homes in other places (i.e. neighbouring villages or the Somer Valley).

2.17 On this matter NPPF:55 states that:

“where there are groups of smaller settlements, development in one village may support services in a village nearby.”

2.18 This embraces the principle that all needs arising from development in one village need not be met at that village. This is backed up by NPPF:29, which states that:

“The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. However, (our emphasis), the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas.”

2.19 The NPPF offers a greater degree of flexibility for plan-making that the Council have hitherto taken-up.

2.20 Given the scale of the task (700 dwellings) Strongvox Homes has no strong view at this stage on a modified Option 1 or an Option 2 approach. However, we believe that the Council should expect a significant uplift (at least a doubling) of the non-strategic growth requirement following the examination of the JSP. Therefore, new rural primary school capacity should be considered in more than one location as part of scenario testing in the preparation of the new Local Plan.

Sustainable Development in the Somer Valley

- 2.21 In the adopted Core Strategy, the Somer Valley policy area is tasked to deliver 2,400 homes² and 900 jobs between 2011 and 2029. This equates to a rate of 133 homes per year, 50 jobs per year and a ratio of 2.66 new homes per additional job. Effectively, with the plan period in BANES being extended by 7 years, a roll forward of that rate/relationship (which has been judged to be sound) would equate to 931 more dwellings if jobs growth prospects were to increase by 350. Given that the JSP already makes a windfall allowance for small sites post 2029, the housing figure of 931 dwellings effectively comes down to 800 dwellings for 2029/30 – 2036/37 for non-strategic sites of 10 or more dwellings). This is broadly the same as the emerging non-strategic requirement of 700.
- 2.22 In justifying the Core Strategy, the Council noted the current imbalance of jobs to homes in the Somer Valley policy area, and its weaker employment growth prospects compared to land in the Green Belt around Bath, Keynsham and Whitchurch. Based thereon it reasoned that additional housing growth on greenfield sites in the Somer Valley and RA.1 villages should be, to a degree, constrained. Therefore, a significant amount of the Core Strategy's residual housing requirement to 2029 was directed to Green Belt locations. However, additional housing supply was not completely constrained in the Somer Valley and a few hundred additional greenfield dwellings were planned, even though the Council could have determined that existing commitments and likely brownfield development should not have been exceeded.
- 2.23 The Core Strategy could have constrained housing growth in the Somer Valley to 2,000 homes (111 homes per year) and 900 jobs, at a ratio of 2.22:1, but it chose to increase housing supply to reduce the need for land to be removed from Green Belt.
- 2.24 The acceptance of a ratio of at least 2.66 dwellings per additional job in the Somer Valley, when a lower ratio could have been used, is a factor that should weigh in the current strategy making process. This does not lead to a conclusion that no additional jobs would result in no further housing, as the latent need for housing would remain, and the need to avoid removing land from the Green Belt would remain.

² 1,000 dwellings at Paulton and Peasedown St John (41.6%)

- 2.25 There are signs in the issues and options document that Peasedown and Paulton may be separated from a future Somer Valley policy area. Based on the Core Strategy housing trajectory, Midsomer Norton, Radstock and Westfield are programmed for 1,400 dwellings 2011-2020 (77 per annum) of the 2,400 for the Somer Valley as a whole. Rolled forward over 7 years this is 539 dwellings, and with a small windfall allowance (assumed at 12 per annum)³ this would equate to 455 dwellings.
- 2.26 Thus, identifying Midsomer Norton, Radstock and Westfield alone for around 450 dwellings would be consistent with the rate of delivery set forth in the Core Strategy.
- 2.27 Paulton and Peasedown account for around 1,000 dwellings over the Core Strategy period (55 per annum). Much of this is at Paulton, which is a special case because of the one-off redevelopment of the former Polestar printing factory. However, as both Peasedown and Paulton large villages in their own right, with a broad range of facilities, then subject to environmental effects and access to primary school places, within a reasonable distance, they too should also receive some development, alongside the towns of the Somer Valley, to reduce the need for green belt land supply. The growth identified for Peasedown for the period 2011-2029 is relatively modest and therefore where clearly suitable sites are identified, sites such as Church Road, should be utilised.
- 2.28 The number of dwellings in Peasedown at the time of the 2011 Census was 2,609. The growth enabled by the Core Strategy to 2029 (95 dwellings At Wellow Lane and 89 dwellings at Greenlands) equates to 184 dwellings and just 7% growth.
- 2.29 In contrast Clutton will grow by 7.8%, and Bishop Sutton and Temple Cloud will grow by 13.4% and 14.3% respectively, despite the fact that they are all less sustainable locations than Peasedown St John. The Core Strategy would also allow Farrington Gurney to grow by 13.5% although land available is an issue affecting deliverability. In principle, and subject to other factors, Peasedown could accommodate at least 15% growth to enable a comparable level of development to these other villages. This would equate to 391 dwellings rather than 184 dwellings (i.e. around 100 further dwellings). However, given its greater level of sustainability there is logic in at least 20% growth being pursued. This would equate to 522 dwellings or (i.e. a further 338 dwellings).

³ Roll forward of November 2016 housing trajectory

2.30 There is, therefore, in-principle, additional development potential at Peasedown for the period to 2036.

3. CHURCH ROAD, PEASEDOWN ST JOHN

- 3.1 The site was the subject of an outline application (14/02547/OUT) by Strategic Placement Ltd for a residential development of up to 55 dwellings with associated infrastructure including public open space, pedestrian routes and landscaping (access to be determined all other matters reserved).

APPENDIX 2: CHURCH ROAD, CONCEPT PLAN

- 3.2 The application was refused on 29/09/2014 for five reasons, namely:

- 1) *For being outside the HDB on a visually prominent site, and constituting the unnecessary development of greenfield land which would unacceptably harm the character and appearance of the area resulting in the loss of attractive open space and being a clear intrusion into the open countryside.*
- 2) *For resulting in additional traffic and highway movements which at peak periods would result in an increase in the number of vehicles waiting to pass the parked cars on Church Road, causing vehicles to have to wait on Bath Road which would affect the free flow of traffic and cause congestion at the junction to the detriment of highway safety.*
- 3) *For failing to demonstrate that proposed footpath links could be realistically achieved as part of the development as they were not included within the red edge of the application and on land outside the applicant's control. Without these links the route for pedestrians and cyclists to local amenities would be of significant length and would not discourage car usage resulting in an unsustainable development.*
- 4) *That the Flood Risk Assessment submitted with the application failed to comply with the requirements set out in the NPPF and therefore did not provide a suitable basis for assessment to be made on the flood risks arising from the proposed development.*
- 5) *That insufficient evidence was submitted to demonstrate that there will be no harm to ecology, habitat provision and protected species.*

-
- 3.3 The impact of development on the significance of St John's Church was not a reason for refusal.
- 3.4 The application was submitted and determined at a time when the BANES Core Strategy had yet to be adopted and was one of several '5-year supply' applications submitted at that time. Some of these were refused and others permitted (including at appeal). Of most relevance is Greenland's Road appeal decision to the east where the reasons for refusal were overcome.
- 3.5 Taking each of the reasons for refusal at Church Road in turn:
- 3.6 Since the application was refused, the Council has adopted Policy NE2A as part of the Development Plan. This relates to the landscape setting of settlements. It is accompanied by a proposal maps designation, with the designated areas for Peasedown St John presented below. The designated area around Peasedown is extensive, and even includes the permitted development site at Greenlands. The land at Church Road is one of the few undeveloped land parcels within or adjoining the framework of the village that is excluded from the Policy NE2A designation, aside from playing pitches, school playing fields.
- 3.7 Policy NE2A states that development that would result in adverse impacts to the landscape setting of settlements that cannot be adequately mitigated will not be permitted. However, the Church Road site is not subject to this policy.
- 3.8 This calls into question the ongoing applicability of reason for refusal (1) in respect of an acknowledged need for additional housing derived from the JSPs non-strategic requirement for BANES. Development on greenfield sites will be 'necessary' and therefore some the harm to the openness of land warranted. The site is clearly not so visually prominent as to be significant to the setting of the village and is of itself unremarkable in appearance. It is not a valued landscape. This site can be regarded as a large urban infill site, not as 'countryside intrusion'.

Extract from the Proposals Map in respect of Policy NE2A



- 3.9 Reason for refusal 2 relates to access issues that the Council highways team identified in respect of cars turning into Church Road from Bath Road at peak times, at the same time as cars were waiting on Church Road to turn into Bath Road. It was stated that this would cause vehicles to have to wait on Bath Road which would affect the free flow of traffic and cause congestion at the junction to the detriment of highway safety. Strongvox are currently investigating the seriousness of this issue, the validity of the reason for refusal and potential solutions.
- 3.10 Reason for refusal 3, on public footpath connections, is not relevant to plan-making. Policy wording for any allocation should highlight the desirability of enabling connections to Hillcrest and Highfield Road, but uncertainty in respect of whether the connections are deliverable is not determinative of suitability in a plan-making context. Whilst it would be better to have such connections, that site cannot be said to be unsustainable without them as claimed in the reasons for refusal. Whereas it is a 7 minute, 0.4 mile walk from the southern boundary of the site with Hillcrest (assuming a connection) to Tesco Express, it is only 11 minutes and 0.6 miles from the northern boundary to Tesco Express via Church Road, not including the slight time saving by using the PROW through the Church Road cul-de-sac. Many part of modern Peasedown e.g. south of Orchard way are 0.6 to 0.7 miles from Tesco Express.

- 3.11 Reason for refusal 4 relates only to a technicality with the FRA, and flood risk and drainage is evidently not an issue on the site.
- 3.12 In respect of reason for refusal 5, insufficient evidence was submitted to demonstrate that there will be no harm to ecology, habitat provision and protected species. Having regard to the ecologist's comments on the preliminary ecology assessment (Ethos) and the proposed layout, it is evident that there is no in-principle ecological objection to the development of the site for housing, but that the layout and therefore the precise number of dwellings was not proven from an ecological mitigation perspective. The desired ecological mitigation strategy can be secured through appropriate policy wording.
- 3.13 Whilst the previous application was refused, circumstances in respect of housing need have evolved, and the landscape sensitivity of the site has been downgraded. None of the reasons for refusal are a barrier to allocation in a plan-making context, where a different degree of evidence is required, but where placemaking principles can be set out to secure the appropriate design response.
- 3.14 We therefore freely submit that the site should be allocated for around 50 dwellings in the new Local Plan. Strongvox will submit additional transport and ecology evidence and, if necessary a revised indicative layout early before the Preferred Options Plan is formulated to inform the revised HEELA.

4. OTHER MATTERS AND CONCLUSIONS

- 4.1 Whilst we do not repeat the bulk of our representation on the West of England JSP, there are a couple of matter of particular relevance to BANES, that if not dealt with through the examination of the JSP, could be raised in the examination of the BANES Local Plan.

Existing Commitments

- 4.2 Having regard to the housing trajectory for the Core Strategy period to 2029 there are risks in respect of the full delivery of Bath Western Riverside and Sydenham Park. It is considered that Western Riverside will ultimately come forward by 2036, but Sydenham Park, which is allocated for 500 dwellings (200 affordable dwellings) is a considerable risk and represents an aspirational allocation as opposed to a site where there is any evidence of realistic long term developability.
- 4.3 'Bunnings' are making a long-term investment in the former Homebase estate and much the site is owed by Sainsbury's, which requires it for car parking for its Green Park store. The mixture of existing use values, long leases and limits on height render reliance on this site extremely high risk, even to 2036.

Contingency

- 4.4 The West of England JSP embraces the concept of contingency strategic locations and other supply of 3,100 dwellings, to be released at plan review to achieve the housing requirement to 2036 if it appears that this is at risk. This is in addition to flexibility; this being the 3,300 dwellings that are to be planned for immediately, over and above the actual housing requirement of 102,200.
- 4.5 Because of a calculation error in the SHMA (in respect if not allowing for vacancy and second homes) the actual housing requirement does in fact claim the flexibility component too. This has the knock-on effect of making the contingency supply the flexibility component, thus leaving no actual contingency. To correct this, in terms of the JSP, another 3,100 dwellings need to be sourced -albeit the scale of the matter is rather superseded by more profound issues identified with the SHMA and the baseline housing requirement.

- 4.6 Nevertheless, in the JSP (as written) North Somerset has a contingency of 1,500 dwellings (6% of its housing requirement of 25,000). South Gloucestershire also has a contingency of 1,500 dwelling (4.6% of its housing requirement of 32,500). Broadly speaking this is around 5% and equivalent to one year's supply for a 20-year plan period. For understandable reasons Bristol has no contingency as it is maximising what can be achieved within its housing of 33,500.
- 4.7 BANES have a rather small contingency of 100 dwellings (0.6% of its housing requirement of 14,500). A more reasonable contingency of at least 5% would equate to around 710 dwellings.

Affordable Housing Delivery

- 4.8 The adopted Core Strategy contains a policy target for 3,290 affordable dwellings for the period 2011-2029, of which 410 relate to backlog in respect of underperformance against the Local Plan 1996-2011, and 2,880 (160 per annum) relate to newly arising need post 2011. This squares with the latest Bath SHMA for the JSP (155 per annum).
- 4.9 Therefore, the ambition to 2029 in the adopted Core Strategy remains valid. From 2011/12 - 2016/17, 1,281 affordable homes have been built in BANES (JSP Topic Paper 1, Diagram 2). This leaves 2,009 more homes to secure over the next 12 years. The JSP and the BANES Local Plan will need to enable this.
- 4.10 BANES have not published a housing trajectory since November 2016. This included data showing a projected supply of 3,205 affordable dwellings for the plan period 2011/12-2028/29 (a deficit of 85 against the target). Since this time the regeneration of the Foxhill estate has been permitted and this will result in a net loss of 204 affordable dwellings, increasing the shortfall to 2028/29 of 290 dwellings.
- 4.11 In addition, for the 7 years post 2029, BANES should really be delivering another 1,085 affordable dwellings to maintain the rate of delivery required by the Core Strategy in respect of newly arising need. Anything less would equate to a drop-in ambition. To its credit, it is evident from BANES Local Plan Issues and Options consultation that it is planning for 3,100 affordable homes to 2036 (100% of the SHMA need). However, it is still necessary to meet the adopted 2029 target en-route to 2036.

4.12 Added together, the underlined figures generate a need for 1,375 affordable dwellings. Having regard to the JSP:

- Whitchurch, if it delivers 1,600 total dwellings to 2036 will yield 480 affordable homes, at 30%;
- North Keynsham, if it delivers 1,400 total dwellings to 2036 will yield 420 affordable homes, at 30%;
- Non-strategic growth, if this delivers 700 dwellings to 2036 will yield 210 dwellings, at 30%;
- This totals 1,100 affordable dwellings;
- Based on Topic Paper 1, 15% of small windfalls in BANES of 672 (TP2, Annex 1), will yield 100 units and lifting supply to 1,200;
- Therefore, over the whole JSP period the shortfall will be 175 affordable dwellings, which at 30% provision would require another 583 total dwellings to correct;
- Moreover, having regard to the housing trajectory of the JSP, the SDLs will deliver 45 affordable dwellings by 2028/29 (the Core Strategy end date), non-strategic growth could all come forward, yielding 110 dwellings by 2028/29 and the small windfalls nothing (as they are all post 2028/29). This is 155 affordable dwellings;
- Therefore, the new supply proposed in the JSP will not be sufficient to correct the shortfall of 290 affordable homes for the Core Strategy period to 2028/29. A residual deficit of 135 will remain, requiring 450 total dwellings to correct, at 30% provision;
- As part of this analysis we have not discounted 200 affordable dwellings from the 500 total units proposed for Sydenham Park in the Placemaking Plan. The prospect of this site delivering anything by 2028/2029 and subsequently to 2036, is minimal.

4.13 Our conclusion is that, simply on the basis of meeting adopted affordable housing requirements to 2028/29, the non-strategic growth figure for BANES should be uplifted by 450 dwellings, from 700 dwellings to 1,150 dwellings. If Sydenham Park is not developable, then a further land supply adjustment will be needed within the JSP for BANES. Because this site is within Bath, 40% affordable housing provision is the policy requirement.

APPENDIX 1

REPRESENTATIONS ON THE PUBLICATION WEST OF ENGLAND JOINT SPATIAL PLAN 2016-2036

AJB/NS/BRS.5718

19 December 2016

West of England Joint Planning Consultation
C/O South Gloucestershire Council
PO Box 299
Corporate Research and Consultation Team
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BY E-MAIL ONLY

Dear Sir/Madam

**Joint Spatial Plan: Towards The Emerging Joint Spatial Strategy (2016-2036)
Land at Church Road, Peasedown St John, Bath**

Pegasus Group are writing on behalf of Strongvox Homes (Strongvox) in relation to a site they have an interest at land to the east of Church Road, Peasedown St John (the site). A site location plan identifying this site is appended to this representation. This letter and the enclosed attachments set out Strongvox's formal response to the current Joint Spatial Plan (JSP) consultation in relation to Peasedown Saint John (Peasedown).

APPENDIX 1: SITE LOCATION PLAN

Overview

The current consultation draft of the JSP expects a total of up to 105,000 dwellings will need to be delivered in order to support the anticipated planning job growth of 82,500 jobs between 2016 and 2036. Pegasus Group, as outlined within wider representations that we are making to this consultation, considers that the total proposed requirement is not sufficiently high enough based on a complete assessment of need, particularly affordable housing.

We note also that within the four authorities existing Core Strategies provision is made for some 66,000 dwellings, leaving a shortfall of 39,000 dwellings to be found across the JSP area. As noted above we consider this shortfall is likely to be increased given our views on the total housing requirement.

The consultation document identifies a series of strategic locations which when combined will account for up to 36,100 dwellings (92.4% of the total). The remainder (up to 3,400 dwellings) will be made up from non-strategic growth. This figure is broken down with a 1,000 per each unitary authority and the final 400 being found at Ashton Vale.

We consider that meeting this level of housing will be challenging, unless a positive and proactive approach is taken by the JSP authorities, particularly in relation to its review of the existing Green Belt.

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It is clear to us that appropriate releases of Green Belt land will be needed and should form part of a positive plan making approach. Green Belt releases should take place in and around sustainable settlements to allow for appropriate levels of growth.

Peasedown St John

Peasedown is a large village and a principal settlement within the Somer Valley area of the Bath and North East Somerset District. The settlement used to be a coal mining village but has experienced substantial growth during the 1960's and 1970's and more recently during the 1990's.

As a large village, Peasedown benefits from a significant and wide range of services and facilities. These include:

- Bakery
- Butchers
- Business Park
- Children's Play Areas
- Cricket field
- Church's
- Coffee shop
- Dental practice
- Doctor's surgery
- Football pitch
- Hospital (Private)
- Newsagents
- Petrol Station
- Pharmacy
- Primary School (Peasedown St John Primary)
- Post Office
- Public Houses (The Prince of Wales, The Waggon & Horses and The Red Post)
- Recreational ground
- Supermarkets (Tesco Express & Co-Operative)

Peasedown is also well located in relation to public transport options with good connections to Bath and being conveniently located on the south side of Bath to maximise use of the Odd Down Park & Ride (Bath South).

JSP and Non-Strategic Growth

The JSP at Table 2 details a series of locations across the JSP area which have been considered but ultimately are not taken forward for inclusion in the emerging spatial strategy. Somer Valley is one of these locations with the JSP stating that it is:

" The Somer Valley is one of the least sustainable locations in the sub-region for accommodating strategic housing growth. There is already a substantial imbalance in the number of workers who reside in the town and the employment available and this will be exacerbated in light of existing residential commitments. It has also proved difficult to attract employment to the area and jobs have been steadily eroded over recent years. Therefore, strategic new housing growth will inevitably lead to substantial out commuting. Transport modelling shows that seeking to mitigate this will be difficult, costly, and only partially effective. The purpose of the new Enterprise Zone is to facilitate employment generation

to help mitigate the existing high levels of out-commuting.”

As noted above the JSP makes planned provision of around 1,000 dwellings for each of the Unitary Authority Areas. We consider that in the case of Bath & North East Somerset (BANES), Peasedown is ideally placed to be able accommodate a significant percentage of this figure.

As can be inferred from the JSP, Bath will face difficulties post 2029 to continue to be able to deliver housing within the city to meet its own needs. Accordingly, it will need to look at the surrounding hinterland and its neighbours to help it meet its requirement.

It is reasonable therefore to consider suitable and sustainable locations, such as Peasedown, which are within a short travel time to Bath should be the focus for a significant proportion of the 1,000 non-strategic homes identified.

Peasedown, is surrounded by Green Belt land to the north, east and partially to the south. Other than Green Belt, the settlement is largely constraint free with the settlement not being the subject of any other landscape or ecological designation. Peasedown also falls solely within Flood Zone 1.

The settlement does not have a Conservation Area and the number of Listed Buildings are minimal.

With this in mind we believe that significant opportunities exist within and directly adjacent to the defined settlement boundary of Peasedown. The site is located adjacent to the existing defined settlement limit of Peasedown and is constraint free.

A development opportunity therefore exists on this site for the delivery of up to 55 residential properties.

Summary

We consider that if the identified housing requirement is to be met (acknowledging that we think this is currently on the low side) then a comprehensive re-assessment of Green Belt across the JSP area is required to ensure that appropriate provision of land is made available for the identified residential development.

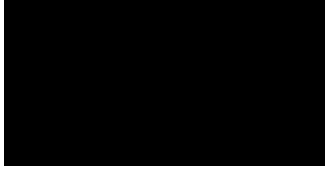
We consider that Peasedown is a highly sustainable settlement which is capable of accommodating further residential growth. The settlement benefits from a wide range of services and facilities already and is conveniently located for journeys to and from Bath. We are of the view that Bath will struggle to meet its on-going needs within the confines of the city by 2029, as a result it will be important to steer growth to key sustainable settlements, such as Peasedown.

The JSP identifies that around 1,000 dwellings of non-strategic growth will need to be found within each of the unitary authority areas. We consider that Peasedown is well located to accommodate a significant proportion of this figure.

The Church Road site, which Strongvox Homes controls, is considered to be a suitable site within Peasedown for residential development, is constraint free and is immediately and readily available.

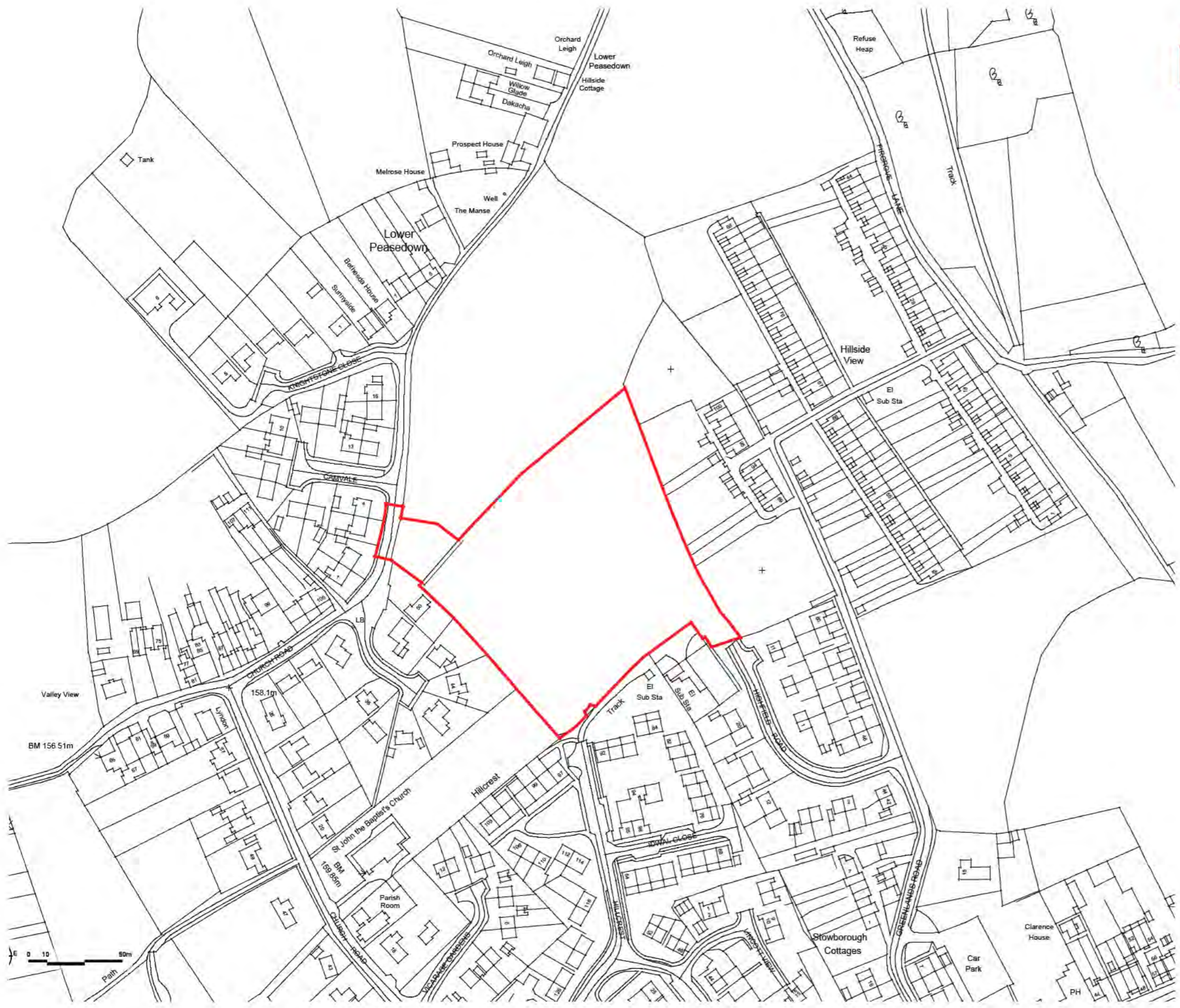
Kind regards

Yours sincerely



Alex Bullock
Principal Planner
e-mail: alex.bullock@pegasuspg.co.uk

enc



KEY



SITE BOUNDARY (1.61HA)

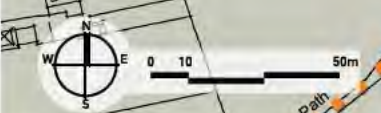
Site Location Plan
Scale 1:2500 @ A3

APPENDIX 2
CHURCH ROAD, CONCEPT PLAN



- KEY**
-  **SITE BOUNDARY** (1.61HA)
 -  **RESIDENTIAL DEVELOPMENT**
(1.41HA - 55 DWELLINGS @ 39DPH NET)
 -  **OPEN SPACE WITH POTENTIAL TO ACCOMMODATE LOCAL PLAY**
(CIRCA 0.1HA)
 -  **INDICATIVE BUILT FORM**
 -  **KEY BUILDINGS TO ASSIST LEGIBILITY**
 -  **PROPOSED INDICATIVE TREE PLANTING**
 -  **SPECIAL HARD LANDSCAPE TREATMENT TO COMPLEMENT LANDSCAPED SPACE**
 -  **EXISTING TREES & HEDGEROWS**
(LOCATION INDICATIVE)
 -  **VISTA TO LOCAL LANDMARKS & ATTRACTIVE LANDSCAPE**
 -  **LOCAL LANDMARK BUILDING**
(ST JOHN THE BAPTIST CHURCH)
 -  **EXISTING BUILT-UP AREA**
 -  **EXISTING FOOTPATHS**
 -  **POTENTIAL VEHICULAR SITE ACCESS**
 -  **PROPOSED PEDESTRIAN ACCESS**
 -  **POTENTIAL LOCATION FOR CHILDREN'S PLAY**

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LAND EAST OF CHURCH ROAD, PEASEDOWN SAINT JOHN - **CONCEPT**