

**B&NES Placemaking Plan Examination:
Hearing Statement Matter 12:
Site Allocations**

By Barton Willmore
On behalf of Taylor Wimpey

Representor no. 7138 Land near Minsmere Road and Manor Road

August 2016

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Hearing Statement Matter 12: Site Allocations**

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Issue 1– whether the strategy for site selection is the most appropriate when considered against the reasonable alternatives, having regard to the evidence to support the selection of allocated sites?

1.0 INTRODUCTION

1.0 This Hearing Statement is submitted on behalf of Taylor Wimpey UK Limited in relation to Land at East Keynsham. As shown on the site plan at Appendix 1, Taylor Wimpey controls land at east Keynsham, lying to the east of Minsmere Road, which was removed from the Green Belt and is safeguarded in the Core Strategy. Taylor Wimpey is also in advanced negotiations with the vendor of the site to the south (accessed from Manor Road) which remains within the Green Belt and is shown edged in orange as 'future Taylor Wimpey land for removal from the Green Belt' on the site location plan at Appendix 1.

2.0 SITE ALLOCATIONS

- 2.1 Due to the absence of five year housing land supply in B&NES and the historic under supply of housing, the Placemaking Plan must make additional housing allocations if the 13,000 housing requirement set out in Policy DW1 of the Core Strategy is to be met.
- 2.2 The Core Strategy, Placemaking Plan and Joint Spatial Plan all identify Keynsham as a key growth location for the delivery of new homes and the provision of jobs. Keynsham has a railway station with direct trains to Bath and Bristol and is well served with facilities, owing to its identification as a sustainable location for growth. As such Keynsham is a logical place to allocate further housing sites to meeting the housing requirement.

3.0 EAST KEYNSHAM

- 3.1 Core Strategy Policy KE3a identifies the East Keynsham Strategic Allocation. As such the broad area of East Keynsham has already been tested through the Core Strategy process and East Keynsham scored highly in the Core Strategy Sustainability Appraisal (July 2014), which concluded:

“Major positive contributions towards social and economic objectives (objectives 1, 2, 3, 4, 7, 8, 10 and 11) are identified. This location is well located to encourage travel by public transport and possible to walk or cycle into Keynsham town centre. Good accessibility to employment opportunities in Bath and Bristol as well as Keynsham. It is a good location for employment, potentially extending the Pixash Lane Industrial Estates helping Keynsham to evolve as a more significant business location.

This location could have a number of minor negative effects, particularly on environmental objectives. This area is of low to moderate landscape sensitivity. The open valley of the River Avon to the north of the railway is of greater sensitivity because of the distinct valley floor character and the proximity to the Cotswold AONB. The development will be in the Green Belt. The GB here plays a significant role in separating Bristol and Bath and is valuable in checking urban sprawl and in safeguarding the countryside from encroachment. HRA screening suggests that development at this location is unlikely to have a significant effect on any Natura 2000 site. Therefore the capacity of 250 homes is recommended.”

- 3.2 Core Strategy Policy KE3b identifies Taylor Wimpey’s land to the east of Minsmere Road as a safeguarded site suitable for residential development, which states that:

“Planning permission for development of the safeguarded land will be granted only when it is proposed for development following a review of the Local Plan.”

- 3.3 On the basis of the above, now is the appropriate time for B&NES to release safeguarded sites as part of the Placemaking Plan process, in order to meet their housing requirement, particularly in East Keynsham which is a sustainable location and where there is need for housing.

4.0 THE OPPORTUNITY AT EAST KEYNSHAM

- 4.1 Additional allocations should be made across the authority, and we consider that Keynsham is an appropriate and sustainable place to allocate housing. Keynsham is identified in the Core Strategy and Joint Spatial Plan as an appropriate location to accommodate new homes, jobs and sustainable growth. If the Placemaking Plan is to deliver this vision, further allocations must be made in Keynsham.
- 4.2 More specifically, Taylor Wimpey's site at East Keynsham is already safeguarded for residential development and its suitability has been tested through the local plan process. As such it is an obvious solution to the need for further allocations to release this safeguarded site and to do this now to avoid further delay with the adoption of the local plan.
- 4.3 The Joint Spatial Plan will require B&NES to take its share of the regional housing requirement under the Duty to Cooperate, and the local plan should be planning for this now. We consider that the allocation of East Keynsham for housing is only a matter of timing given that the principle of developing the site is established, and B&NES needs to allocate the site for housing now.
- 4.4 Taylor Wimpey's land at East Keynsham comprises two adjoining fields:
1. A northern field lying adjacent to Minsmere Road and immediately to the south of the east Keynsham strategic site allocation (allocated under the Bath and North East Somerset Core Strategy). This field was removed from the Green Belt and safeguarded for future residential development in the B&NES Core Strategy under Policy KE3B. It is located between the existing urban edge at Minsmere Road and the Manor Road Community Wood to the east. The topography of the land is reasonably flat with a gentle incline from north to south. This site is owned by Taylor Wimpey and can accommodate approximately 80 dwellings.
 2. A southern field, to the north of Manor Road, which currently remains within the Green Belt. The site is currently the subject of an agreement in principle between Taylor Wimpey and the vendors.
- 4.5 It should be noted that, the safeguarded site can be brought forward without the southern parcel which is still within the Green Belt, but this land could be considered for future development, and should be assessed by B&NES as part of a Green Belt review.

The parcels could be delivered on their own because they can be accessed independently from Manor Road and Minsmere Road.

- 4.6 This field is bordered on its eastern and part of its northern boundary by Manor Road Community Wood, its southern boundary abuts Manor Road and to its west is late twentieth century housing development on Hurn Lane. To the north of the Taylor Wimpey land, and also shown on the enclosed site location plan, is a further area of land (adjoining the allocated strategic site) which was removed from the Green Belt and safeguarded for future development by the BaNES Core Strategy.
- 4.7 In total there is approximately 15ha of developable land at east Keynsham, just under 7ha of which are within Taylor Wimpey's ownership. On reasonable density assumptions, this land at east Keynsham could deliver around 400 new homes, together with the wider East Keynsham area.
- 4.8 As noted above, much of the land at East Keynsham has already been removed from the Green Belt and safeguarded for future development needs. The only further Green Belt release needed would be of the southern field (north of Manor Road) which is hatched red on the enclosed plan.
- 4.9 East Keynsham is, as was identified within the B&NES Core Strategy, a sustainable location for residential development. Much of the land has already been removed from the Green Belt and is safeguarded for future development needs. We have identified how additional land to the south could be removed from the Green Belt to create a more comprehensive, larger-scale development and long-term Green Belt boundary (although the safeguarded land can be delivered independently of this parcel). On this basis, Land at East Keynsham (incorporating both parcels as outlined in paragraph 4.4 above and shown on the site location plan at Appendix 1) should be allocated within the Placemaking Plan for residential development.
- 4.10 On the basis of the above, we consider that in its current form the Placemaking Plan is unsound. It fails to meet the NPPF tests of soundness of being positively prepared, justified, effective, or consistent with national policy. The draft Placemaking Plan is not flexible or adaptive to change and fails to consider the implications of the Joint Spatial Plan and the requirement to accommodate the housing need from the Wider Bristol HMA under Duty to Cooperate and in this respect it fails to be in accordance with national policy. The soundness of the Plan is significantly compromised by its lack of flexibility to respond and adapt to change. As such, we consider the Placemaking Plan to be unsound, and comprehensive work will need to be undertaken on the evidence base and

housing need in order to deliver the objectives of the Core Strategy and the Joint Spatial Plan.

APPENDIX 1
SITE LOCATION PLAN

APPENDIX 2
BARTON WILLMORE FIVE YEAR
HOUSING LAND SUPPLY REVIEW TABLE

BANES 5YHLS REVIEW

Site	2014 5yhls for 2016 – 2021 (BANES Housing Trajectory 2011-2029, dated Dec 2014)	5yhls figure for 2016 – 2021 (BANES Housing Trajectory 2011-2029, dated April 2016)	Our figure	Comments
Bath				
MOD Warminster Road	175	175	75	Full permission (14/02272/EFUL) granted 03/03/2015 for 204 homes. No evidence that conditions are being discharged, although BANES state that the owners, Firestone, have commenced site clearance. Unlikely that any homes will be built in the next two years, but maybe 25 per year could be achieved 2018/2019 and 2020/2021
Rear of 89-123 Englishcombe Lane	20	40	0	The land has been allocated for the development of 40 dwellings since the adoption of the BANES Local Plan (2007). Council owned land which has not come forward due to the recession and a ransom strip. Council is currently agreeing terms to sell the site to Redcliffe. Given that a planning application hasn't even be prepared, very unlikely that any houses will be built in the next 5 years.
Roseberry Place	150	175	25	Outline application submitted 28/04/15 for 200 flats (15/01932/EOUT) received positive recommendation at committee in November 2015. Section 106 yet to be signed, after which reserved matters and conditions will need to be approved. Unlikely 175 homes will be built in next 5 years when Section 106 yet to be signed and conditions discharged.

Bath Press	200	244	50	<p>Application submitted (15/02162/EFUL) for 244 homes, which has received a recommendation for approval by officers and at committee but awaiting signed Section 106 with Meyer Homes.</p> <p>Unlikely 244 homes will be built in next 5 years when Section 106 yet to be signed and conditions discharged.</p>
Land at Odd Down	240	100	0	Allocated for 300 dwellings in the Core Strategy. Bloor Homes expected to submit an application in mid/late 2016
Keynsham				
Fire Station and Riverside, Keynsham	90	48	0	Housing Land Supply Report (April 2016) states that prior approval application submitted in August 2015 for change of use from B1a to 110 residential units (15/04723/ODCOU), but withdrawn due to highways objection – so why is this site still in the trajectory?
East of Keynsham (M&M)	225	100	25	<p>Allocated for 250 dwellings in the Core Strategy.</p> <p>Planning application submitted 23/02/16 (LPA ref: 16/00850/OUT) for 250 dwellings.</p> <p>Application not yet determined.</p> <p>It is unrealistic to expect that 100 homes will be built in the next 5 years, as the outline application needs to be approved and Section 106, followed by reserved matters and then conditions.</p>
South West Keynsham	579	381	173	<p>2007 Local Plan allocation.</p> <p>Western section granted planning permission for 285 dwellings (09/03351/FUL) and is being developed by Taylor Wimpey. 36 completions 2013/2014 and 62 in 2014/2015.</p>

				<p>Eastern section (Bilbie Green) has planning permission for 267 dwellings (14/00049/FUL) and is being built out by Barratt and David Wilson Homes. 6 homes were built 2015/2016.</p> <p>Current completion rate equates to 34 dwellings a year, multiplied by 5 years this is 173 homes.</p>
Somer Valley				
Old Pit Yard, Clandown	53	44	25	<p>Outline planning permission for 44 dwellings granted in October 2015 (14/02889/OUT)</p> <p>No evidence that reserved matters have been submitted or conditions are being discharged</p>
Welton, Bibby and Baron	150	100	0	<p>Draft Placemaking Plan proposes to allocate the site for 100 dwellings.</p> <p>No application submitted, but pre-application discussions undertaken.</p>
St Peters Factory	70	81	25	<p>2007 Local Plan allocation. Oval Estates submitted an application in October 2014 for 91 dwellings (14/04003/OUT) which was subsequently reduced to 81 dwellings and planning permission was granted 02/03/2016.</p> <p>No evidence that reserved matters have been submitted or any conditions have been discharged.</p> <p>Unlikely that any dwellings will be built in the next 3 years, but potential for some completions in the last 2 years.</p>
Total		1,488 homes	394 homes	