



Representations on behalf of Wessex Water and Mr Charles Carr to the Bath and North East Somerset Draft Placemaking Plan (August 2016)

LAND ADJACENT TO AND AT COMBE EDGE HOUSE,
BRASSKNOCKER HILL, MONKTON COMBE, BATH

15 AUGUST 2016



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INTRODUCTION

1. This Representation is submitted by Colliers International on behalf of both Wessex Water and Mr Charles Carr, in relation to land adjacent to and at Combe Edge House, Brassknocker Hill, Monkton Combe, Bath & North East Somerset. Colliers International is instructed to promote this land through the Local Plan making process.
2. The site measures 7.2 hectares of grades 2 3 and 4 of agricultural land located within the district boundary of Bath, as defined on the City of Bath Local Plan Proposals Map. The site is located on the south east periphery of the settlement of Claverton, accessed from Brassknocker Hill (Please see attached Plan).
3. The site borders agricultural land to the south and south west, beyond the western boundary lies The Sulis Club Cricket Ground, to the north of the site lies the Wessex Water Operations Centre.
4. The site does not have any known physical constraints relating to topography, access or alike. The land is currently in agricultural use and is currently developable land which can accommodate approximately 102 dwellings; this figure is reflected by its location and the surrounding development. The site is washed over with green belt designation and will require a green belt release or allocation to be brought forward for development.
5. The development site has a number of designations such as the whole site is washed over by the Green Belt, the AONB and World Heritage designation.
6. The site is located within the administrative area of Bath and North East Somerset Council. The site can come forward and deliver a housing scheme capable of accommodating up to 25 dwellings.
7. A detailed flood map and modelled flood levels provided by the Environment Agency show that the site is located within Flood Zone 1.

Potential Use

8. The proposed development site is capable of accommodating a housing scheme with up to 102 dwellings; this is reflected by its location. This is subjected to the constraints analysis, any proposed technical solutions and open space provision.
9. In answering the specific questions posed by the consultation, these representations provide a response that will assist the Bath & North East Somerset in meeting the requirements for plan making set out in the National Planning Policy Framework (NPPF) tests of soundness and the Duty to Co-operate, both legal and procedural requirements.

QUESTION 1: WHAT ARE YOU COMMENTING ON?

10. These representations relate to Policies B1, B4, SB19 contained within Volume 2, The Vision of Bath of The Draft Placemaking Plan (Pre-Submission version), dated December 2015.

Policy B1: Bath Spatial Strategy

11. It is acknowledged that Policy B1: Bath Spatial Strategy seeks to protect the and maintain the City of Bath World Heritage Site and its setting, however it is also acknowledged that “Council wish to enable the appropriate modification of heritage assets, including the World Heritage Site, for development that reduces carbon emissions”. The land we are promoting is situated to the south of Claverton Down; the site is designated as World Heritage status and does not fulfil all the purposes of why land should be included within the World Heritage designation. The site is surrounded on two sides by built development including the 2ha site to the north (Wessex Water Operations Centre).

Policy B4: The World Heritage Site and Setting

12. No comment

Policy SB19: University of Bath at Claverton

13. It is acknowledged that Policy SB19: University of Bath Claverton has been allocated as a yellow zone and the Sulis Club has been identified as an opportunity to redevelop on previously developed land. The land being promoted by Wessex Water and Mr Carr at Combe Edge House is located adjacent to the Sulis Club.
14. The land is in very close proximity of the redevelopment opportunities that the council have identified for redevelopment and provides an excellent and sustainable location for much needed development.
15. Land at Combe Edge House needs to be removed from the Green Belt in order for the council to meet the full objectively assessed need for housing that remains to be delivered through this plan.
16. The land adjacent to and at Combe Edge House should be considered appropriate as an allocation. The need to release this site from green belt is driven by the requirement to plan better for the future.

QUESTION 2A: DO YOU CONSIDER THE DOCUMENT IS LEGALLY
COMPLIANT?

17. No. the plan does not consider the duty to cooperate and the need to assist in the delivery of any overspill from the Wider Bristol Strategic Housing Market Area.

**QUESTION 2B: DO YOU CONSIDER THE DOCUMENT IS
SOUND?**

18. No. The Plan does not seek to deliver the correct amount of housing in sustainable locations and areas of least impact, especially when considering the performance of specific sites identified for release from the Green Belt within this version of the plan and those sites that are available and have not been considered for release from the Green Belt.
19. The plan also does not consider the need to meet the full objectively assessed need for affordable housing provision. A market-led development strategy will not deliver the full amount of the Authority's affordable housing needs unless further sites are allocated.
20. The plan is not justified as a consequence of the inadequate supporting evidence.

QUESTION 3: IF YOU CONSIDER THE DRAFT
PLACEMAKING PLAN IS UNSOUND, IS IT BECAUSE IT IS
NOT: POSITIVELY PREPARED, JUSTIFIED, EFFECTIVE AND
CONSISTENT WITH NATIONAL POLICY

Tests of Soundness

21. To be 'sound' a plan must be:
- **Positively prepared-** the plan should be prepared based on a strategy which seeks to meet the objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
 - **Justified-** the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 - **Effective-** the plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities; and
 - **Consistent with national policy-** the plan should enable the delivery of sustainable development in accordance with the policies in the Framework;

Positively prepared

22. In approach, this plan has been positively prepared and sets out the opportunities for development and clear policies on what will or will not be permitted and where. The plan has considered the overflow needs of the Bristol Housing Market Area within the B&NES Strategic Housing Market Assessment Update 2013.
23. Despite this there may be the need for a further update of these figures in light of the West of England Joint Spatial Plan (JSP), which identified the need for 85,000 dwellings across the West of England Bristol Housing Market Area. This represents an additional 29,000 dwellings above the levels previously identified, Although other planning practices have suggested a higher figure with NLP identifying the FOAN to be 131,551 to 144,928 dwellings over the Plan period, whereas Barton Willmore have presented a FOAN of 153,000 dwellings. Neither approach by NLP or BW is inconsistent with our understanding that 85,000 dwellings is a gross underestimate of housing needs and that additional housing may be required in parts of B&NES such as Keynsham to help meet this requirement.

Justified

24. Housing numbers have been forecast accounting for the number jobs likely to be created by the employment allocations within Bath, These numbers have been based on sites approved and allocated under the B&NES Core Strategy part 1, adopted 10th July 2014. Since this document was adopted the Homes and Communities Agency have published new guidance in the form of the Employment Density Guide 3rd Edition, November 2015.

25. Through reviewing the volumes of employment space allocated within the this area, we estimate the number of jobs that could be supported by the existing allocation to be in the region of 1,900 (Appendix 1). Should this number be delivered the housing allocation of 2,150 new homes will be inadequate to meet demand.

Effective

26. The proposed allocations within the Draft Placemaking Plan are deliverable given that many of the allocated sites already have existing planning consent and others have had potential developers identified through the SHLAA. The Council have engaged with neighbouring LPAs to assess the need to accommodate housing demand from these areas although they may not have been supplied with sufficiently accurate information by these authorities.
27. We are of the opinion that whilst the Draft Placemaking Plan satisfies the test of soundness criteria in respect to Co-ordinated planning, Co-operation and Monitoring. However it lacks the flexibility to respond to a variety of, or unexpected changes in, circumstance as the majority of housing sites allocated are existing full or outline consents limiting the plans ability to respond to any additional housing need emerging during the period up until 2029 as most of the planned supply will be delivered during the early part of the plan period.
28. It is our opinion that when considered in the context of the emerging West of England Joint Spatial Plan, which identifies a number of sites to meet the need for housing within the Bath Housing Market area, that the Draft Placemaking Plan should include a greater proportion of medium to longer term sites to ensure sufficient flexibility to meet any additional need in areas. Given that infill sites within the town are already accounted for in the draft plan, it will be necessary to locate any additional allocations on the edge of the settlement as such the release of land within the greenbelt should be considered where it facilitates sustainable development.

Consistent with national policy

29. Insofar as the Draft Placemaking Plan is concerned our only concern in regard to consistency with national policy whether the plan is based on data that is sufficiently up to date, as required by NPPF paragraph 158, when considered in the context of the emerging West of England Joint Spatial Plan and updated guidance from the HCA in relation to employment densities.
30. To positively prepare a local plan the strategy must be proactive in setting and achieving a realistic, yet challenging level of development. This plan is not seeking to deliver against the full objectively assessed need for all types of housing. The gap in need for the delivery of affordable housing will not be fully met by the strategy proposed and an over reliance on the market to provide adequate levels of affordable housing on brownfield and non-green belt sites will not be successful.

31. The plan requires additional evidence to support its strategy and therefore it is not positively prepared, justified or effective for the purposes of assessing it against national policy.

QUESTION 4: PLEASE GIVE DETAILS OF WHY YOU
CONSIDER THE DRAFT PLACEMAKING PLAN IS NOT
LEGALLY COMPLIANT OR IS UNSOUND?

32. The plan does not deal with the Duty to Cooperate and neither does it consider the objectives of the West of England Partnership Joint Strategic Plan.
33. For the reasons set out above, the plan is neither positively prepared, justified nor effective.

QUESTION 5: PLEASE SET OUT WHAT CHANGE(S) YOU
CONSIDER NECESSARY TO MAKE THE DRAFT PLACEMAKING
PLAN LEGALLY COMPLIANT OR SOUND?

34. We would recommend a proportional increase in housing allocated to account for the proposed increase in employment space that is being sought through the West of England JSP.
35. In order to maintain the current ratio of employment to new dwellings, roughly an additional 350 dwellings would need to be allocated within the authority, 102 of these could be located on the land at Claverton Down, Bath.
36. An allocation on land at Claverton Down would be consistent with general principles of the plan and its inclusion would be consistent with the targets and objectives set out within the draft transport strategy for Keynsham, which notes that there is unlikely to be sufficient demand to support additional transport infrastructure aside from that proposed as part of the S106 agreement for the Somerdale site. This document also states that it is essential that developments are served by good pedestrian routes to pedestrian routes to existing services and recognises that the provision of public transport.
37. The site is well located in relation to the existing district boundary and the service centres it provides, namely being only 3.02 to the centre of Bath. The site lies within close proximity to the following facilities: The Sulis Club Cricket Ground – 150m, Ralph Allen School- 500m, Nearest Bus Stops are located under 50 metres, Bath Bus Station and Train Station 3km and Prior Park College-1.66km thus helping to achieve the objective of the draft transport strategy. As such the development on the site is likely to encourage cycling and walking as a form of local transport for short journeys.
38. Whilst the site is washed over by greenbelt, some built form is on site and it is not entirely open.
39. Although the site is outside of the defined Housing Development boundary and has a number of Heritage and landscape designations, it is a site that can come forward immediately if the site was inset in the green belt.
40. There is a realistic prospect that the site can come forward for up to 102 dwellings as the site has a willing land owner, who is actively engaged in the planning process and has aspirations of working with the community to meet their objective of achieving a planning consent.
41. In summary, this site should be considered appropriate for development. It should be included in B&NES Placemaking Plan in order to meet both the local need identified above and to contribute further towards the additional Housing Supply requirement. As the site is Achievable, Deliverable and has a Realistic Prospect of contributing up to 102 dwellings in a sustainable location, it should be allocated.

QUESTION 7: IF YOUR REPRESENTATION IS SEEKING A
CHANGE; DO YOU CONSIDER IT NECESSARY TO PARTICIPATE
AT THE ORAL PART OF THE EXAMINATION?

42. Yes, we would like to be present at the hearing sessions and to present our verbal representations.

QUESTION 7: IF YOU WISH TO PARTICIPATE, PLEASE
OUTLINE WHY YOU CONSIDER THIS TO BE NECESSARY

43. It is necessary as we would like to highlight the soundness issues presented above. We would also like to take the opportunity to make formal detailed representations regarding the disparities between the housing market information and economic development figures that are not currently aligned for Bath.

APPENDIX 1: ILLUSTRATIVE MASTERPLAN

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