

EXAMINATION INTO THE SOUNDNESS OF THE BANES PMP

**INSPECTOR'S MATTERS AND ISSUES FOR EXAMINATION AT
HEARINGS**

MATTER 16: HOUSING IN KEYNSHAM

POSITION STATEMENT ON BEHALF OF

MACTAGGART AND MICKEL HOMES LTD (ID: 6346)





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RA Ref: MACT0001
LPA Ref: -
Office Address: Number One
Queen Square Place
Bath
BA1 2LL
Telephone: +44 (0)1225 433675
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1. Introduction

- 1.1 This Statement sets out Mataggart and Mickel's preliminary response to the Inspector's question in relation to Matter 16.

- 1.2 It should be read in conjunction with both the representors' submissions to the Submission Draft PMP, and their Position Statements relating to other matters identified by the Inspector for Examination.



2. Issue 1: Whether the policies contained in the Placemaking Plan would meet the housing requirement for Keynsham of 2,150 new dwellings (net)?

Q1

- 2.1 Keynsham is the second most sustainable settlement in the district after Bath. In view of the constraints on development land in and around the city of Bath, Keynsham has been identified as an appropriate location for a strategic scale of development. Land has been removed from the Green Belt (at East Keynsham and South-West Keynsham) and allocated through the Core Strategy. There is also safeguarded land at East Keynsham that has been removed from the Green Belt to provide a buffer of land that can be released for further residential development as required.
- 2.2 The three key sites, at Somerdale (Policy KE2), East Keynsham (Policy KE3a) and South West Keynsham (Policy KE4) are commitments through planning permissions and/or the Core Strategy, and there is no reason to question their deliverability and/or capacity. They have a combined capacity of approximately 1,150 dwellings.
- 2.3 The only other site that is allocated in the PMP is the Riverside and Fire Station Site (Policy KE2b). Although there is reference to residential development as part of a mixed use scheme, no capacity figures are identified, and it is acknowledged that there are considerable complexities pertaining to its redevelopment.
- 2.4 Having regard to the provisions relating to Housing, Jobs and Growth set out on pages 15-16 of the PMP, the identified capacity amounts to a maximum of 1,951 dwellings. If the lower end of the ranges for sites KE3a and KE4 are assumed, it reduces to 1,901.
- 2.5 The identified capacity in the PMP is therefore approximately 200 units short of the overall requirement. It is also germane that sites K2a and K2b are sites that were allocated in the Bath and North East Somerset Local Plan to meet development requirements arising from the Joint Replacement Structure Plan in the period to 2011. If these sites are discounted, the identified capacity reduces to 1,400 dwellings.

- 2.6 There would therefore appear to be considerable uncertainty that sufficient allocations have been made to achieve the housing requirement for Keynsham. At best, the provisions would seem to be 200 dwellings short of the minimum requirement for Keynsham.
- 2.7 It is anticipated that the Council will produce further evidence to support its position at the Hearing. In advance of a detailed exposition of how the requirement will be met, which is not contained in the PMP, the representors are unable to comment further on this matter.
- 2.8 It is also important to emphasise two further points in relation to this matter. First, the requirement is a minimum which, in accordance with the objective to 'boost significantly' housing delivery, the Council should be seeking to exceed through the PMP. Second, the strategic greenfield sites allocated at Keynsham through releasing land from the Green Belt are necessitated in part by the constraints on development land at Bath. In the event of there being delivery constraints on allocated sites at Bath, and/or additional development requirements to accommodate such as currently unmet needs associated with the Universities, then it is likely that the deficit will have to be made up through further land allocations at Keynsham. The only option for making good any such deficit is through utilisation of the safeguarded land at East Keynsham.
- 2.9 With regard to the safeguarded land at East Keynsham, the Core Strategy policy permits its release following a review of the Local Plan. Given that it has been removed from the Green Belt, it would not be contrary to strategic policy for that review to be undertaken through the PMP which forms part of the Local Plan. If it is found to be necessary to meet the objectively assessed needs of current strategic policy, it would be of a nature and scale that would not materially change the strategic approach, and found to be sound, in the Core Strategy. Policy KE3b does not say that it will only be released to meet needs arising in the period beyond 2029. Although the policy as originally worded indicated as such, it was subsequently changed in accordance with the recommendation of the Examination Inspector.
- 2.10 There is nothing in the strategic policy that would preclude release of the safeguarded land at East Keynsham through the PMP. Through the changes that the Council is seeking to introduce to the Core Strategy policies through the PMP elsewhere, it accepts that partial review of elements of the Core Strategy through the PMP is legally compliant.

3. Issue 2: Whether the site allocations are the most appropriate when considered against reasonable alternatives, having regard to the evidence to support the selection of allocated sites?

Q1

- 3.1 The allocations have largely been set through the Core Strategy, or are otherwise committed through planning permissions. It is therefore not available to the PMP to revisit them.
- 3.2 The evidence does not support the selection of the Riverside and Fire Station site at this stage owing to uncertainties relating to its deliverability. However, it is unclear whether any reliance is being placed on this site in delivering the housing requirement for Keynsham.
- 3.3 The guidance in the NPPF is that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities (para. 52). This augers in favour of the release of the safeguarded land at East Keynsham with the expanded new primary school by which it will accompanied, the enhanced green infrastructure provisions, and the potential for enhanced sustainable transport links through the site. The benefits will be clear from the masterplan that has been prepared for the overall site (see copy at Annex 1).
- 3.4 Given that additional sites allocations would seem to be necessary to meet the requirement at Keynsham, the release now of the safeguarded land at East Keynsham the subject of Policy KE3b would seem to be supported by the evidence when considered against reasonable alternatives.

Q2

- 3.5 The development requirements and design principles for the site allocations have been largely set through the Core Strategy. They were discussed in some detail at the Core



Strategy Examination, and were amended in the light thereof. There would in consequence appear to be little scope for revisiting them at this juncture, although the representors would be pleased to review them with the Inspector at the Examination if appropriate.





Annex 1

East Keynsham Masterplan





Existing development

- Wellway Secondary School
- Chandag Junior School
- Chandag Infant School
- Wellway Sports Centre
- Snap Dragons Nursery (Elisbridge House - Grade II listed)
- Waitrose
- Existing Play Area
- Bus stop

Urban interventions

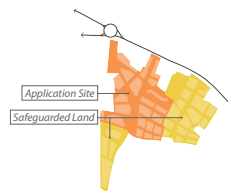
- 1 New vehicular access from A4 and pedestrian crossing points
- 2 Primary School and playground (Phase 1 Development)
- 3 Primary School and playground (Phase 2 Development)
- 4 Gateway avenue route
- 5 New route along location of historic Roman Road
- 6 Pedestrian access to Wellway Secondary School and sports facilities
- 7 Low density edge - Outward Facing Development
- 8 Village Green
- 9 Woodland Visitors Centre

Landscape interventions

- 9 Riparian corridor
- 10 Sports pitches (Phase 2 development)
- 11 Wetland with water attenuation ponds
- 12 Allotments
- 13 Community squares
- 14 Woodland buffer planting
- 15 Play area
- 16 Public Right of Way Retained
- Existing trees retained
- Proposed trees

Existing building uses

- Education
 - Retail
 - Industrial
 - Residential
- Street Hierarchy**
- Footpath
 - Homezones
 - Secondary
 - Main Link Road
 - Strategic Cycle Route



East Keynsham
Concept Masterplan
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CliftonEmerydesign

Ground Floor Number 10, Clifton Office Park, First Floor Clifton, Bristol, England, BS2 2JH
T: 01172 358556 | W: www.cliftonemerydesign.co.uk | M: 07832 010000

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