

**Matter 16
Issue 2 - Q1, Q2
Representor No 6426
Persimmon Homes
Severn Valley**

BATH PLACEMAKING PLAN EXAMINATION

August 2016

Statements for the Bath Placemaking Plan Examination

Matter 16 – Housing in Keynsham

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

- Q1. Does the evidence support the selection of the allocated sites, when considered against any reasonable alternatives and having regard to deliverability considerations?
- Q2. Are the development requirements and design principles for the site allocations positively prepared, justified, effective and in accordance with National Policy?

1. Introduction

1.1 Persimmon Homes Severn Valley have interests in land at Charlton Road, Keynsham, allocated within the adopted Core Strategy at Policy KE4. We therefore do not consider it is appropriate to include Policy KE4 in any re-examination of the issue as part of the examination of the Placemaking Plan for the following reasons:

1. Policy KE4 was not identified as part of the Placemaking Plan Consultation;
2. The site was thoroughly examined at the Core Strategy examination;
3. There are shortly to be determined planning applications submitted on the site.

2. Placemaking Plan Consultation

2.1 The explanatory note to volume 3 of the Placemaking Plan sets out the procedure for the consultation. This makes it clear in the first paragraph that the Placemaking Plan allocated specific sites for development and *'complements and seeks to deliver the strategic framework set out in the adopted Core Strategy.'*

2.2 In respect of this it is clear that the Placemaking Plan should complement, not replace the Core Strategy. Secondly, Policy KE4 is part of the adopted Core Strategy and therefore itself is part of the strategic framework.

2.3 The second paragraph of the explanatory note to volume 3 says only text which is highlighted in grey can be commented upon as the Core Strategy text is already adopted policy. No part of Policy KE4 is highlighted in grey, as distinct from KE2, KE2a and KE2b. In addition it also says *"any changes to the Core Strategy text are indicated by 'strike through' for deletions and 'underlined' for additions."* No part of KE4 is either struck through or underlined. Therefore no part of KE4 is superseded by the Placemaking Plan.

3. Core Strategy Examination

3.1 The Inspector's Report on the Core Strategy Examination was published on 24th June 2014. Appendix 1 contains an extract relating to *'land adjoining South West Keynsham – proposed Strategic Allocation Policy KE4.'* From

that we would highlight the following conclusions, to demonstrate the position that KE4 was thoroughly examined and modifications recommended which were subsequently adopted:

- *'It is a much less sensitive location in Green Belt terms than other edges of Keynsham'* (paragraph 209);
- *'Charlton Road and Park House Lane would create logical new Green Belt boundaries'* (paragraph 210);
- *'Whilst some off-site works are likely to be required . . . the details should await further assessment at the application stage in a Traffic Impact Assessment'* (paragraph 214);
- *'Overall there would be a loss of Green Belt, but not in a sensitive location and wider purposes of the Green Belt in this area would be maintained'* (paragraph 216);
- *'The wider visual impact would be limited'* (paragraph 216);
- *'The allocation would include 180-200 dwellings and 30% would be affordable'* (paragraph 216);
- *'There are no better alternative sites at Keynsham'* (paragraph 26).

3.2 In respect of alternative sites we would comment as follows:

- (a) The Inspector considered alternative sites consisting of a larger allocation for safe-guarding at South West Keynsham, Uplands Farm, Manor Road and land north of the railway line at Avon Valley Country Park Business Park;
- (b) The Inspector also considered smaller sites and concluded 'nor are there exceptional circumstances to justifying allocating any smaller sites or for signalling in the plan that site allocations should subsequently be made in the Placemaking Plan.'

3.3 In the light of these conclusions, it is clear that the Core Strategy examination considered reasonable alternatives and demonstrated the site allocations, and particularly Policy KE4, are the most appropriate.

4. Planning Applications

4.1 In the light of the adopted Core Strategy, Persimmon Homes Severn Valley and Bloor Homes, who control the total allocation have prepared a joint comprehensive Masterplan and Development Principles document for the site and this was agreed by the Development Management Committee on 29th July 2015. (Minutes attached as Appendix 2)

4.2 Following that approval of the Masterplan document, both companies submitted planning applications as follows:

- Persimmon Homes Severn Valley planning application number 15/04290/FUL registered 22nd September 2015 for parcel 3100, Charlton Road, Keynsham for residential development of 100 new dwellings, new vehicular access off Charlton Road and associated landscaping and infrastructure works;
- Bloor Homes planning application number 16/02077/FUL registered on the 28th April 2016 at parcel 2100, Parkhouse Lane, Keynsham for residential development of 100 new dwellings and new vehicular access off Charlton Road and associated landscaping, drainage and infrastructure works.

- 4.3 Negotiations with the Council on the Persimmon Homes Severn Valley application are well advanced, including the S106, and will be dealt with under delegated powers.

5. Conclusion

- 5.1 Therefore in view of the above, in response to the Inspector's specific questions:

Question 1 – The evidence considered by the Core Strategy Inspector, including consideration of reasonable alternatives, supported the allocation of land at Charlton Road under Policy KE4, which was adopted with modifications. The approval of a Masterplan for the site and submission of two planning applications by house builders who will build and sell the houses themselves demonstrates the site is being brought forward immediately following the adoption of the Core Strategy and will be delivered.

Question 2 – Development requirements and design principles for Policy KE4 are set out in a comprehensive Masterplan and Design Principles document, which are positively prepared, justified and in accordance with National Policy as confirmed by the agreement of the policy to the document on the 29th July 2015.

Paul Davis
Strategic Land Director
Persimmon Homes Severn Valley

Appendix 1



The Planning Inspectorate

Report to Bath and North East Somerset Council

by **Simon Emerson BSc DipTP MRTPI**

an Inspector appointed by the Secretary of State for Communities and Local Government

Date 24 June 2014

PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

REPORT ON THE EXAMINATION INTO BATH AND NORTH EAST SOMERSET COUNCIL'S CORE STRATEGY

Document submitted for examination on 3 May 2011

Examination hearings held between 16 January - 1 February 2012; 15 March 2012; 17 September and 10 - 11 December 2013; and between 26 March - 10 April 2014

File Ref: PINS/F0114/429/4

would be only after 2029. There may be issues to overcome, such as traffic congestion, but they can be properly assessed as part of the plan review at any stage. I have amended the wording in **MM67** accordingly.

208. The landowner/promoter here had previously advocated a much larger allocation to include the safeguarded land and land on the western edge of Saltford (*Creating a new parkland community for Keynsham and Saltford CD13/8*). There may be some benefits from such a scheme, such as an alternative bus route between Saltford and the Broadmead roundabout and the creation of a new park where development is constrained by the gas pipeline. However, the delivery of the 13,000 housing requirement does not require this scale of development here. I find below that the allocation at Whitchurch is sound and replacing that allocation with additional housing at East Keynsham is not justified. The western edge of Saltford would not be as sustainable a location as the edge of Keynsham and the effect on the Green Belt gap between the settlements would be similar.

Land adjoining south west Keynsham - proposed strategic allocation policy KE4 (CSA37, CD10/CS1)

209. The Council's appraisal of the significance of the land for the Green Belt purposes is in the *Green Belt Stage 2 Report* (Land parcel A, Table 3.4.4, CD9/E9). For some Green Belt purposes this land is not relevant and for other purposes its contribution is very limited. It is a much less sensitive location in Green Belt terms than other edges of Keynsham.
210. Charlton Road and Parkhouse Lane would create logical new Green Belt boundaries. The policy requires (PP6) new woodland planting along the lane (as shown on the Concept Diagram) to provide a landscape buffer from views to the south and east. With such planting, the visual impact of the development would be satisfactorily contained and the potential for significant visual harm identified in the *Keynsham South Landscape and Visual Assessment* (CD9/LV8) would be mitigated (largely achieving what is suggested in the *Landscape Update for Keynsham - CD10/E13*).
211. The policy requires (PP4) that development does not break the skyline in views from the Queen Charlton Conservation Area. The allocated land falls away from Charlton Road and given the intervening plateau and woodland I am satisfied that there would be no harm to the conservation area, which was a concern flagged in the *Heritage Asset Study* (Appendix 4, Table A4.5, CD9/LV1).
212. The site is on the southern edge of Keynsham and is not particularly well located for encouraging travel by means other than the car, although Parkhouse Lane would provide an attractive route for walking and cycling to the town (less steep for the return than Charlton Road). Existing bus services pass through the housing estate to the north and the new service from Keynsham to south Bristol referred to above would be a useful addition.
213. Given the location on the southern edge of town, a higher proportion of traffic generated by the development is likely to access Bristol via Whitchurch rather than through Keynsham compared with other parts of the town. Taking into account the measures proposed at Keynsham to encourage modal shift, the

residual cumulative impact on the local road network should not be severe (Framework, paragraph 32).

214. The policy requires (PP13) off-site capacity improvements, including two named junctions. The need for this is disputed by the site promoter. I am not satisfied that the Council's evidence (CD9/I2/1 and Appendix F CD9/I2/7) is sufficient to confirm that improvements are essential at these specific junctions as a result of this allocation. The assessment for South West Keynsham in Appendix F assumed trip generation from 400 residences, whereas in the main report *scenario 1* was based correctly on 200 dwellings here. It is not clear that the determination of specific junction improvements took into account the correct scale of development. The assignment of trips to the network may also need further refinement. Whilst some off-site works are likely to be required (and the promoter has offered to realign the priority at the junction of Charlton Road and Wollard Lane, which would be welcomed by the Parish Council), the details should await further assessment at the application stage in a traffic impact assessment.
215. The allocation includes a dwelling - *The Bungalow* - not currently in the control of the site developer. Whilst it is reasonable to include this land in the allocation it is not essential for this part of the site to be developed if the land is not available. Its exclusion would slightly reduce capacity. If unavailable, it would not be possible to deliver the *reinstated path* along the southern boundary shown on the Concept Diagram, but I do not regard that as critical and, rightly, it is not a requirement in the policy. As with East Keynsham, I consider that greater flexibility is required in relation to density and the expected total number of dwellings should be expressed as a range of 180-200 to ensure that a satisfactory design and layout can be achieved.
216. Overall, there would be a loss of Green Belt, but not in a sensitive location and the wider purposes of the Green Belt in this area would be maintained. The wider visual impact would be limited. There would be no other significant harm. The allocation would achieve 180 -200 dwellings in a location that offers some alternatives to the use of the car. Of these dwellings, 30% would be affordable. There are no better alternative sites at Keynsham (see below) which could replace the contribution to housing that this site would make. There are the exceptional circumstances to justify removing the land from the Green Belt and the Council's decision to allocate this site represents positive planning. Subject to the detailed amendments referred to above I recommend the allocation as necessary to make the plan sound (**MMs 65 part, 71, 72, and 73**).
217. Both of the policies for strategic allocations at Keynsham include reference to sewerage improvements. The infrastructure table for Keynsham needs updating in relation to sewerage improvements and education provision (**MM76** and **MMs 74** and **75** for consistency and clarity). To reflect the strategy for additional housing at Keynsham, including the two allocations to be removed from the Green Belt, the text relating to Keynsham needs amending (**MMs 1, 10, 57, 58, 59**) as does the strategic policy for the town (**MM61**) and the related key diagram (**MM62**).

Other sites at Keynsham

218. Bloor Homes have promoted for many years development of over 1,000 homes at south west Keynsham to include the land now proposed for allocation by the Council, together with most of the land between Parkhouse Lane and Redlynch Lane (CD13/5). In the light of my preliminary conclusion that the plan need provide no more than around 13,000 dwellings, the safeguarding of this land rather than its allocation is now sought. Such a scale of safeguarded land would be significant in the future assessment of appropriate locations to meet sub-regional needs. For the reasons already given, it is best not to safeguard such large areas in the absence of a sub-regional assessment undertaken co-operatively by the West of England Authorities.
219. The overall sustainability merits of this location are not so strong as to justify safeguarding now (part of **MM109**). As already indicated, it is a peripheral location away from the main transport corridor for rail and bus services. There is also the potential for significant wider landscape impact as set out in the Council's assessment *Keynsham South Landscape and Visual Impact Assessment* (CD9/LV8). This land is seen in extensive views across the Chew Valley from the east and accordingly I do not find the promoter's favourable landscape assessment convincing (CD13/6). Given its rural character and wider visibility, the land south of Parkhouse Lane fulfils the Green Belt purpose of preventing encroachment into the countryside (Land parcel B, Table 3.3.4, CD9/E9).
220. I am satisfied that there are no clearly preferable alternative sites in the Green Belt abutting Keynsham which should be allocated or safeguarded in this plan. Land at Uplands Farm is in a peripheral, elevated location, in an open landscape setting. Apart from the north eastern corner, the land south of Lays Farm industrial estate is on an open plateau in a sensitive part of the Green Belt between Keynsham and Stockwood. Whilst in the long term, new woodland planting might preclude inter-visibility between these two urban areas (see CD13/22), I do not regard such planting as mitigating significant harm to the Green Belt here, since the Green Belt primarily seeks to retain openness. Land at Manor Road (Land parcel C4 in *Green Belt Stage 2 Report* Table 3.3.4, CD9/E9) is a relatively small parcel. Even if this was combined with the triangle of safeguarded land to the north (in the control of the same developer) it would not enjoy the accessibility benefits of the allocated land.
221. Complex and ambitious proposals for houses and employment were promoted on land north of the railway line at Avon Valley Country Park and Business Park (see for example CD10/LD3a and CD13/23-26). Such proposals would cause significant visual harm in an open landscape (*Keynsham East Landscape and Visual Impact Assessment* (CD9/LV7); significantly undermine Green Belt purposes of preventing sprawl and the merger of towns (Land parcels A1-3, *Green Belt Stage 2 Report* Table 3.3.4, CD9/E9); and require complex new road infrastructure, creating uncertainty about delivery. At the hearing in April 2014, only a small allocation (3ha) was sought on land immediately to the south of the main country park complex. However, such an allocation would make a hole in the Green Belt. There are not the exceptional circumstances necessary to remove this land from the Green Belt. Nor are there exceptional circumstances to justify allocating any smaller sites or for signalling in this plan that such allocations should subsequently be made in the Place-making Plan.

Appendix 2

Bath and North East
Somerset Council

DEVELOPMENT MANAGEMENT COMMITTEE

Minutes of the Meeting held

Wednesday, 29th July, 2015, 2.00 pm

Councillor Rob Appleyard	- Bath & North East Somerset Council
Councillor Jasper Martin Becker	- Bath & North East Somerset Council
Councillor Paul Crossley	- Bath & North East Somerset Council
Councillor Sally Davis (Chairman)	- Bath & North East Somerset Council
Councillor Donal Hassett (In place of Councillor Matthew Davies)	- Bath & North East Somerset Council
Councillor Eleanor Jackson	- Bath & North East Somerset Council
Councillor Les Kew	- Bath & North East Somerset Council
Councillor Bryan Organ	- Bath & North East Somerset Council
Councillor Caroline Roberts	- Bath & North East Somerset Council
Councillor David Veale	- Bath & North East Somerset Council

24 EMERGENCY EVACUATION PROCEDURE

The Senior Democratic Services Officer read out the emergency evacuation procedure

25 ELECTION OF VICE CHAIRMAN (IF DESIRED)

A Vice Chairman was not required

26 APOLOGIES FOR ABSENCE AND SUBSTITUTIONS

An apology for absence was received from Council Matthew Davies whose substitute was Councillor Donal Hassett

27 DECLARATIONS OF INTEREST

Councillor Les Kew declared an interest in the planning application at Maynard Terrace, Clutton (Item 1, Report 10) as he had relatives who owned land near to the site and he would therefore leave the meeting for its consideration. Councillor Rob Appleyard declared a disclosable pecuniary interest in the same application as he was a Non-Executive Director of Curo (the applicants) and he would also leave the meeting for its consideration. Councillor Eleanor Jackson declared an interest in the application at Shortwood Common Cottage, Hinton Blewett (Item 1, Report 9) as she was acquainted with an electrician who was her near neighbour who had worked on her property and was involved in the application site. She would therefore leave the meeting for its consideration.

(Note: Councillor Caroline Roberts stated that, despite living in the vicinity of No 153 Newbridge Hill (Item 4, Report 10), she did not have an interest to declare on the application and would speak and vote on the matter.)

In determining this application the Local Planning Authority considers it has complied with the aims of paragraphs 186 and 187 of the National Planning Framework. The Local Planning Authority acknowledges the approach outlined in paragraphs 188-192 in favour of front loading and operates a pre-application advice service. Notwithstanding active encouragement for pre-application dialogue the applicant did not seek to enter into correspondence with the Local Planning Authority. The proposal was considered unacceptable for the reasons given and the applicant was advised that the application was to be recommended for refusal. Despite this the applicant choose not to withdraw the application, and having regard to the need to avoid unnecessary delay the Local Planning Authority moved forward and issued its decision.

Item No:	10	
Application No:	15/00006/CONSLT	
Site Location:	Parcel 3100, Charlton Road, Keynsham,	
Ward: Keynsham South	Parish: Keynsham Town Council	LB Grade: N/A
Application Type:	Consultation	
Proposal:	Comprehensive Masterplan and Design Principles for the proposed redevelopment of the site at Charlton Road, Keynsham pursuant to Policy KE4 of the Bath & North East Somerset Core Strategy 2014.	
Constraints:	,	
Applicant:	Bloor Homes And Persimmon Homes	
Expiry Date:	12th June 2015	
Case Officer:	Rachel Tadman	

DECISION

Agreed by committee

Minute Item 34

UPDATE REPORT

ITEM NUMBER 10

REPORT ON THE MASTERPLAN IN ACCORDANCE WITH POLICY KE4 OF THE CORE STRATEGY

Parcel 3100 Charlton Road, Keynsham, Bristol

Planning ref: 15/00006/CONSLT

CONSULTATIONS AND REPRESENTATIONS:

Compton Dando Parish Council:

The council is very concerned about the road junctions and the possible 'rat run' through Redlynch Lane, which is bad enough already. The council also requests that the current statement that the 3 storey buildings are not to be put on the edge of the development but kept to a more central location, are adhered to.

OFFICER COMMENTS:

Whilst the comments from Compton Parish Council regarding highway safety are noted, such concerns will be dealt with at the detailed planning application stage. Furthermore with regard to building heights, the submitted Masterplan confirms that, in line with Policy KE4 of the Core Strategy, the proposed dwellings will be limited to 2/2.5 storeys, at this point 3 storey buildings are not proposed.

RECOMMENDATION:

The published Committee report asks that Members of the Development Management Committee note the submitted Masterplan.

As Policy KE4 of the Core Strategy requires the Council to 'agree' the Masterplan it is proposed that the recommendation is amended to read:

That Members of the Development Management Committee agree the submitted Masterplan.