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**Sellwood  
Planning**

Chartered Town Planners  
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Matter 19 / 6350

**Bath and North East Somerset Placemaking Plan  
Public Examination**

**Matter 19  
Housing in Somer Valley**

**Submitted by**

**Sellwood Planning**

**on behalf of**

**The Property Development Company Ltd**

**August 2016**

Regulated by RICS

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## **1.0 Introduction**

- 1.1 These responses to the Inspectors Questions on Matter 19 ‘Housing in Somer Valley’ have been prepared on behalf of The Property Development Company Ltd (PDCL), which has land interests at Smallcombe Road, Clandown, Radstock (see plan of site in Appendix 1).

### **Issue 1 : Whether the policies contained in the Placemaking Plan would meet the housing requirement for Somer Valley of 2470 new homes to be built at Midsomer Norton, Radstock, Westfield, Paulton and Peasedown St John?**

#### **2.0 (Q1) : “Is CS Policy SV1, as amended to restrict development within the housing development boundary (unless identified in a neighbourhood plan), positively prepared and justified”?**

- 2.1 The amended policy does not appear to say what is suggested. There are no restrictions on housing within the Housing Development Boundary, the restrictions apply to sites which are outside the Housing Development Boundary. In these cases, housing will only be acceptable if it is identified in a Neighbourhood Plan. It is considered that this is unduly restrictive since it would prevent any ‘exception sites’ (eg. local affordable housing) coming forward at those communities that decided not to prepare a Neighbourhood Plan.

#### **3.0 (Q2) : “Are sufficient housing allocations made to achieve the housing requirement”?**

- 3.1 The Plan should set out a clear statement of the components of the housing land supply necessary to achieve 2470 homes in the plan period. At the present time, it is not possible to assess from the Plan the shortfall which will need to be made up by new allocations and the degree that the Council is providing for flexibility by ‘over

allocating’, should some allocations or planning permissions fail to come forward as anticipated.

- 3.2 However, reference to the Council’s document “Housing Land Supply Findings Report” (April 2016) suggests the following position in the Somer Valley

Completions 2011 / 12 ~ 2015 / 16	994
Large sites with planning permission	1,104
Small sites with planning permission	125
Small windfalls	162
Large brownfield sites / allocations	118
	2,503

- 3.3 Whilst this figure marginally exceeds the Core Strategy housing target for Somer Valley by 33 (or 1.34%), this fails to reflect the delivery problems and uncertainty inherent in a housing supply that is dominated by complex, brownfield redevelopment sites, many of which require decontamination. The 2,503 figure includes 118 units identified as allocations which is only 4.78% of the Somer Valley housing provision.

- 3.4 These figures demonstrate how the achievement of the Core Strategy housing provision in the Somer Valley is marginal at best and would not be achieved if one or more of the large previously developed sites ran into delivery problems or there was a downturn in the housing market, affecting viability. The prudent approach, which would also allow greater flexibility in the achievement of the strategy and a greater choice of types of sites and locations, would be to allocate some additional well located sites on the edge of main settlements. This would also accord with the advice on choice in paragraph 50 of the NPPF.

**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?**

**4.0 (Q1) : “Does the evidence support the selection of the allocated sites, when considered against any reasonable alternatives and having regard to delivery considerations”?**

4.1 As noted above in Section 3, the number of housing allocations proposed in the Somer Valley is very limited, and as will be described below, they are all challenging brownfield sites. Whilst there is no reason why challenging brownfield sites should not be selected, the primary objective must be to ensure that 2470 new homes can be completed in the Somer Valley by 2029. This need for a ‘contingency’ or ‘flexibility’ allowance is all the more important since a significant proportion of the stock of unimplemented planning permissions is also made up of brownfield sites with delivery issues.

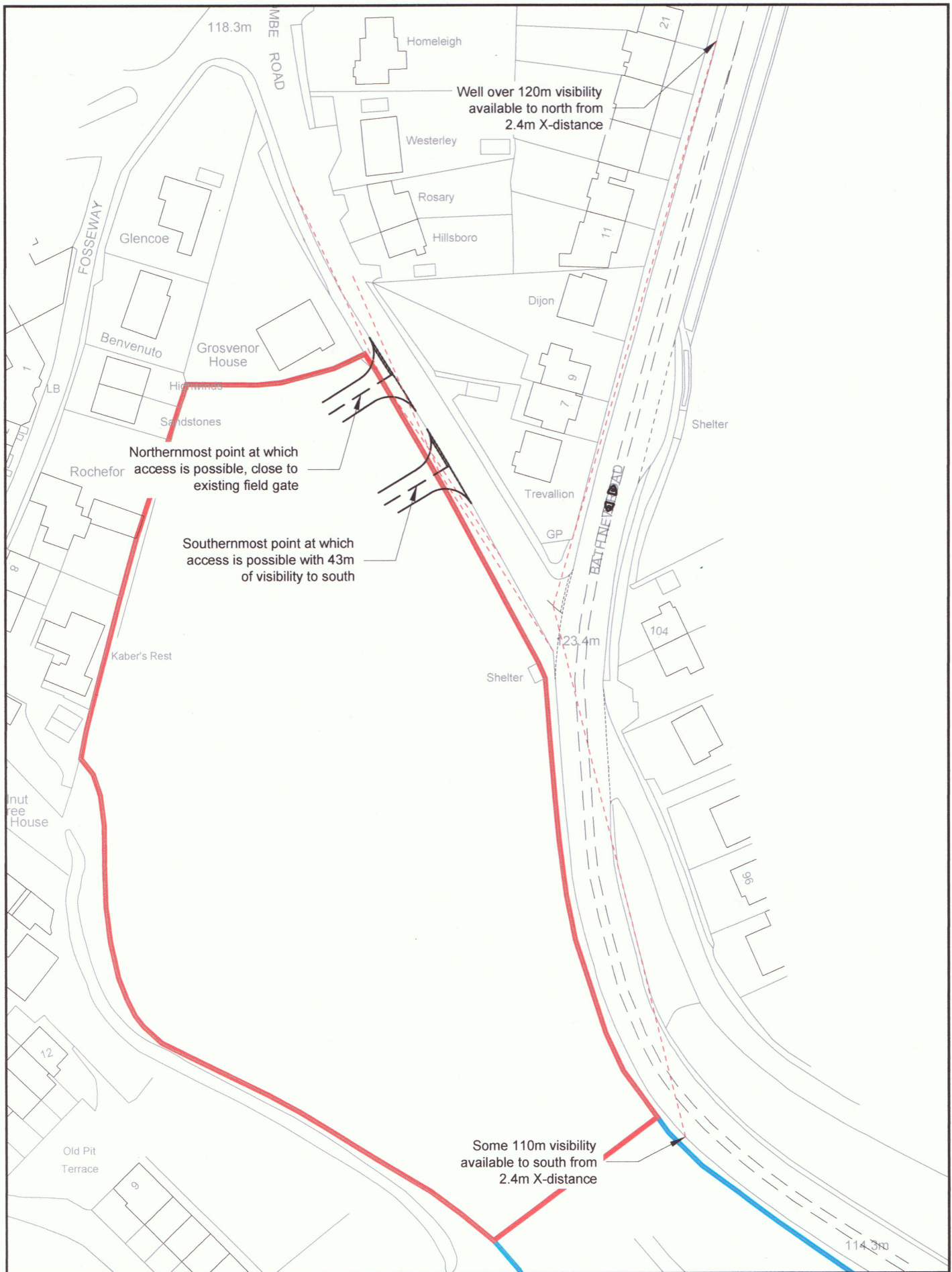
4.2 Reference to the Placemaking Plan discloses only four sites where a dwelling target is expressed. These are

- SSV4 Former Welton Manufacturing Site : This former industrial site is identified for at least 100 homes plus employment and retail. The Housing Land Supply Findings Report (paragraphs 2.111 to 2.112) indicate that the former employment occupier has promoted the site for development, but no planning application has been submitted and no preferred housebuilder selected. Market interest appears to be untested. As the HLS report states ***“nevertheless the northern part of the site will still need to be sold to a housing developer, assuming one is interested...”*** (2.11.2)
- SSV3 Midsomer Norton Town Park : This is primarily a proposal for a new Town Park with the potential for 35 homes. Paragraph 2.110 of the HLS study confirms that the 35 dwellings was granted planning permission in November 2015, so the site now forms part of the committed supply
- SSV17 Former Radstock County Infants : This is a proposal for 10 units. The school closed in 2005 and some derelict buildings remain on site. The HLS report gives no guidance on this site

- SSV11 St Peter's Factory : This was an allocation for around 100 homes in the 2007 Local Plan and is a former quarry and limekiln. A resolution to approve 81 homes was agreed by Members in March 2016.

- 4.3 The Property Development Company is not challenging the principle of any of the proposed allocations. The issue is whether other parts of the land supply will deliver the full housing target of 2470 homes. In order to ensure this can be achieved, further sites should be allocated on the edge of built up areas of the main settlements. The Property Development Company Ltd proposes that an additional allocation is made on land which it owns at Smallcombe Road, Clandown, Radstock shown outlined in red on plan IMA-13-060 (attached). This land is outside the Green Belt and the Area of Outstanding Natural Beauty but adjoins the built up area boundary. It is well located in terms of access to the facilities in the centre of Radstock. The site is also well served by bus services on the A367 between Radstock, Peasedown St John and Bath which would give residents a real choice to use public transport rather than the car.
- 4.4 The site has an area of 1.4 hectares and was assessed in the SHLAA (Site RAD17) of having a capacity of around 40 dwellings at 30 dwellings to the hectare. Plan IMA-13-060 demonstrates how the site is surrounded by development on all sides other than a small 'neck' of land (40 metres wide) which adjoins undeveloped land to the south east. This adjoining land is also owned by The Property Development Company and is shown blue on the plan. Part of the 'blue' land could be used as public open space and to provide improved public footpath access to Coomb End and Radstock. The plan shows how two alternative points of access are available on to Smallcombe Road. The site is controlled by a developer and has no other known constraints that would prevent its early development. It is therefore a sustainable and deliverable site.

# Appendix 1



**I M A** TRANSPORT PLANNING  
 11 KINGSMEAD SQUARE  
 BATH BA1 2AB  
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 F: 01225 444 055  
 e: bath@ima-tp.com

SCALE @ SIZE:  
 1:100@A4  
 DATE:  
 June 2013  
 CAD FILE:  
 Access#1-1.dwg

PROJECT: Land at Smallcombe Road, Cladown  
 Possible Access Arrangements  
 Off Smallcombe Road  
 PROJECT No: IMA-13-060  
 DRAWING No: Plan 2  
 REV: