

# **Bath & North East Somerset Local Plan**

**Options Consultation  
(Reg 18)  
February 2024**

**Draft Housing and Economic Land  
Availability Assessment (HELAA)**

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**Bath & North East  
Somerset Council**

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**Improving People's Lives**

## 1 Introduction

- 1.1 This document is the Bath & North East Somerset Council (B&NES) Housing and Economic Land Availability Assessment (HELAA). It is being published alongside the Local Plan Options Consultation.
- 1.2 The HELAA is evidence that supports and informs the preparation of planning policy in Bath & North East Somerset.
- 1.3 The purpose of the HELAA is a technical assessment of the suitability of land for the development for housing or economic uses. This assessment includes assessment of constraints, suitability, availability and achievability.
- 1.4 The HELAA does not confer planning status on any land for development. It is for the Local Plan to allocate land for development, based on a range of considerations such as the spatial strategy in the Local Plan, the HELAA and further work done after the HELAA assessments on the development potential of sites.

## 2 Planning Policy Context

- 2.1 The Development Plan in Bath & North East Somerset (B&NES) primarily comprises the Core Strategy (adopted in 2014) the Placemaking Plan (adopted in 2017) and Local Plan Partial Update (LPPU, adopted 2023), which cover a plan period from 2011 to 2029. Together these documents form the Local Plan for B&NES. The Council is required to review the Local Plan every five years in order to determine whether it remains fit for purpose or whether all or part of it needs to be updated.

## 3 HELAA Methodology

- 3.1 This HELAA follows the methodological principles set out in the [National Planning Practice Guidance \(PPG\)](#). It is not considered necessary to repeat that guidance here. However, it is considered necessary to set out in more detail than the PPG, how the process of identifying sites and assessing their suitability has been carried out.

### Site identification

- 3.2 Sites were identified from a number of sources:
  - The previous full strategic housing land availability assessment (SHLAA) published in 2013
  - A call for sites exercises undertaken at various points during plan making
  - Representations received through all the consultation stages of the Joint Spatial Plan
  - Representations received through Local Plan consultations
  - Council sites surplus to requirements
  - Proactive Search Sites

## **Stage 1 Site Filtering**

- 3.3 A total of 600 sites were found within the current B&NES HELAA. These were identified through a variety of sources in accordance with the PPG, including previous strategic housing land availability assessments, Call for Sites exercises undertaken at various points during plan making, representations received through Local Plan consultations and proactive searches undertaken by Council officers.
- 3.4 Since the existing HELAA was last reviewed, five sites (K21, K22, K23, K24 and SAL29) have been identified with revised site boundaries or new representations submitted. These have been considered as part of the assessment but have not resulted in a change in the total number of sites considered.

### **Sites that are partially or wholly outside of the Plan Area**

- 3.5 Paragraph 006 of HELAA PPG specifies that the area selected for assessment should be the plan-making area. GIS Analysis found that a total of eight sites (BC01, BC02, BC03, MDP22, MDP31b, S1PS23 and S1PS25) were entirely located outside of the plan-making area and, as such, were discounted from further assessment.
- 3.6 Sites that are partially within the plan-making area are further considered at Stage 2 as they have potential to deliver above the HELAA threshold, but their gross developable area has been adjusted to reflect the development capacity within the plan-making area.

### **Sites below the minimum site size threshold**

- 3.7 Paragraph 009 of the HELAA PPG advises that it may be appropriate to consider all sites and broad locations capable of delivering 5 or more dwellings, or economic development on sites of 0.25 hectares (or 500 square metres of floorspace). An analysis exercise identified 34 sites in the existing HELAA which would not deliver 5 or more dwellings. These sites were discounted at Stage 1 Site Filtering in accordance with the PPG. No sites in the HELAA are promoted for economic development below 0.25 hectares.
- 3.8 A list of the discounted sites can be found in Appendix A.

### **Duplicate Sites**

- 3.9 Site MDP32, SHAWS and TIM17 found within the HELAA shapefile were identified as duplicates and therefore excluded from the assessment.
- 3.10 Five additional duplicate sites (K19a, LAN05c, BES02a, RAD26a and NSL04) have also been deleted to prevent double counting. The specialist assessment has been considered through the source site where applicable.

## **Proactive Search Sites**

- 3.11 In this iteration of the HELAA, we have incorporated sites identified through proactive searches undertaken by officers. These sites are typically strategically positioned along primary transport corridors and within 400m of existing settlements.

## **Stage 2 Suitability Assessment**

- 3.12 The suitability assessment followed a two-stage approach which filtered sites that wholly intersect with primary constraints ( $\geq 90\%$ ) and provide high level summaries of suitability constraints. It considered whether each site is an appropriate location for development when considered against relevant constraints and the potential to be mitigated in accordance with Paragraph 018 of the HELAA PPG.
- 3.13 A range of spatial data and the existing evidence base has been used to inform the analysis, including:
- GIS analysis of the percentage intersect between site and identified primary and secondary constraints, based on available national or local policy data. Where appropriate, distance from and count of the designations on or near the site have also been considered;
  - AECOM Area of Search Assessment undertaken for specific places in Bath and North East Somerset i.e. Keynsham and Saltford, Whitchurch and the Somer Valley;
  - B&NES Specialist Assessment (where available);
  - Site information including Call for Sites submission and previous HELAA; and,
  - Desktop review of aerial photography.

## **Stage 2a Initial Survey**

- 3.14 Paragraph 014 of the HELAA PPG suggests that when taking into account national policy and designations, there may be some sites and broad locations which are clearly not suitable for development. A number of primary constraints which are considered to be absolute constraints (also known as 'showstopper' constraints) have been identified based on Footnote 7 of the NPPF. They also broadly reflect published methodologies in the existing HELAA and those by neighbouring authorities.
- 3.15 Where a site or broad location wholly intersects with a primary constraint(s), the site is considered as unsuitable for development, and has been discounted from further assessment. Where a site or broad location partially intersects with a primary constraint(s), the site has been taken forward for more detailed consideration with a reduced developable area at Stage 2b.

3.16 The following designations were identified as primary constraints in the HELAA:

- Ramsar sites and proposed Ramsar sites;
- Special Protection Areas and (SPAs);
- Special Areas of Conservation (SAC) and (SACs);
- Sites of Special Scientific Interest (SSSIs);
- National Nature Reserve (NNR);
- Local Nature Reserves (LNR) ;
- Regionally Important Geological Sites (RIGS);
- Flood Zone 3;
- Ancient Woodland;
- Scheduled Ancient Monuments;
- Registered Battlefields;
- Registered Parks and Gardens; and,
- Common Land.

3.17 A number of constraints stated in Footnote 7 were not considered as 'showstoppers' in the HELAA as sites with these constraints may be suitable for future development subject to other technical work being undertaken and policy considerations of the Local Plan. These constraints are however considered through further suitability assessments as secondary constraints.

3.18 The relevant policy constraints include:

- **Green Belt (and Local Green Space):** Sites were not automatically discounted on the basis of being in the Green Belt as they are potentially suitable for development subject to Green Belt review and demonstration of exceptional circumstances;
- **Area of Outstanding Natural Beauty (or National Landscapes):** Sites were not automatically discounted on the basis of being in the Area of Outstanding Natural Beauty. The impact of development on the AONB should be considered in the next stages and would be subject to detailed site investigation and design work, demonstration of exceptional circumstances and the benefits of development in relation to public interest. Footnote 60 of the NPPF clarifies whether a proposal is 'major development' in the context of AONB is a matter of the decision, considering its nature, scale and setting, and whether it could have a significant adverse impact on the purpose for which the area has been designated or defined. Therefore, a maximum site threshold within the AONB has not been applied at this early stage;
- **City of Bath World Heritage Site:** Sites were not automatically discounted based on being within the setting of the City of Bath World Heritage Site. The impact of development on the designated heritage asset is considered based on B&NES specialist assessment (where available) at Stage 2b.

## Stage 2b Further Suitability Assessment

3.19 Sites that were not filtered from the initial survey are further assessed based on GIS Analysis of secondary constraints/opportunities and the existing evidence base, including the AECOM Area of Search Assessment and B&NES Specialist Assessment (where appropriate) on landscape, ecology, heritage, trees and flood and drainage. The key constraints considered are in accordance with Paragraph 015 and 018 of the HELAA PPG.

3.20 The following designations were identified as secondary constraints/opportunities in the HELAA:

- Green Belt
- Area of Outstanding Natural Beauty (National Landscapes)
- Existing policy allocations and safeguarding areas
- Local Green Space
- Fluvial Flood Risk
- Risk of surface water flooding
- Groundwater Source Protection Zone
- Wansdyke or Somersetshire Coal Canal
- Priority Habitats
- SSSI
- Green Infrastructure Network (Policy)
- Ecological Network and Connectivity Opportunities (Policy)
- Tree Preservation Order
- World Heritage Site and its indicative setting extent
- Conservation Areas
- Listed Buildings
- Undesignated heritage assets
- Landscape setting of settlements
- Cycle Routes
- Public Rights of Way
- Air Quality Management Areas
- Town Centres and Employment Zones
- Unstable Land
- Contaminated Land Register
- Historical Landfill
- Agricultural Land Quality

3.21 Sites are categorised as suitable, potentially suitable or unsuitable, accompanied by a high-level summary of key constraints present on site (including whole and partial intersection):

- **Suitable:** Site provides an appropriate location for development with no or minor constraints present.
- **Potentially suitable:** Site provides a potentially appropriate location for development subject to further technical investigation and mitigation of identified constraints.

- **Unsuitable:** Site is subject to one or more significant constraints which could not be reasonably mitigated to provide an appropriate location for development.
- 3.22 Where a site is partially constrained by environmental or physical factors, but a portion of the site is potentially developable, its site area is adjusted to reflect the developable area and the estimation of development capacity is applied to the reduced site area.
- 3.23 A number of HELAA sites are extant residential allocations in the adopted Local Plan. As all allocations have been reviewed in the past year, they are assumed as fit for purpose and unlikely to require further reviews of potential further capacity. These sites would be assessed as suitable in the HELAA and explicitly identified to avoid duplication when calculating the overall housing supply. Allocations which have since received planning permission prior to March 2023 are discounted from the assessment to avoid double counting.
- 3.24 Sites have not been ruled out where they are currently safeguarded employment sites as further employment evidence and strategy are being developed at the time of assessment. The appropriate form of development would need to be considered as part of the Local Plan strategy, taking into account the range of development need.
- 3.25 A few sites in the HELAA are promoted for non-residential uses, particularly renewable energy generation. The assessment follows a consistent approach but would require further consideration in relation to the emerging renewable energy evidence.

### **Stage 3 Availability Assessment**

- 3.26 Building on the existing HELAA, the availability review incorporated additional or more up-to-date information now available, including data from the Call for Sites 2023 submission and recent planning history. Sites with partial planning permission were also identified and reviewed in relation to whether the remaining parts of the site could be developed and further considered in the HELAA. Legal searches in land ownership have not been conducted at this stage.
- 3.27 All sites are categorised as ‘available’, ‘potentially available’ or ‘unavailable’ based on the following criteria:
- **Available:** Site is actively promoted for development, supported by recent Call for Sites submissions, or planning application, and has no known impediments to development.
  - **Potentially Available:** Site is not subject to any known impediments to development based on the best information available, but would require further work, such as landowner engagement, to confirm its availability. Sites previously assessed as ‘availability not proven’ would typically fall under this category unless additional or updated information suggests otherwise.
  - **Unavailable:** Site is confirmed as unavailable for development within the plan period by the landowner.

## **Stage 4 Typologies Matching (Achievability Assessment)**

- 3.28 Paragraph 020 of the HELAA PPG recommends the achievability assessment to consider whether there is a reasonable prospect that the type of development will be achieved on the site at a particular time, based on the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period.
- 3.29 Stage 4 therefore involved matching each site against typologies used in the 2021 BNP Paribas LPPU Viability Study to identify viability issues from particular types of sites to provide a robust, yet proportionate assessment on achievability.
- 3.30 The Viability Study compared the residual land values of 15 non-site specific development typologies expected to come forward up to 2029 to a range of benchmark land values, based on policy requirements within the adopted Local Plan. The development typologies used include multiple variables, including site size, land use, development density and building typology (Table 1), unable to be directly matched to the HELAA sites.
- 3.31 The likely viability of development could however be established based on four site characteristics explored (Appendix B), including:
- Price Point Area that the site falls within, based on spatial analysis using postcode sector data and residential sales values survey through the LPPU Viability Study;
  - Existing land use on site (such as greenfield or previously developed land) and its associated benchmark land value;
  - Proposed or assessed land use; and,
  - Proposed development density (where provided).
- 3.32 The analysis was also complemented by site-by-site considerations of key abnormal costs identified from previous HELAA analysis, specialist assessment and desktop observations. Key factors considered include:
- Costs associated with treatment for contaminated sites or listed buildings;
  - Cost associated with brownfield, phased or complex sites;
  - Demolition of existing structures;
  - Flood prevention measures at waterside locations;
  - Remodelling land levels;
  - Relocating infrastructure such as substations or power lines; and,
  - Significant access improvements required.

3.33 Based on the assessment of the above factors, sites were classified under the following categories:

- **Achievable:** Site is of a viable development typology based on land use, price point area, site type and development density. There are no known factors that may impact its achievability.
- **Potentially Achievable:** Site is of a potentially viable development typology based on land use, price point area, site type and development density. It may be subject to policy or physical factors that may impact its achievability.
- **Unachievable:** No sites were assessed as unachievable at this stage.

3.34 It is important to note that the work undertaken is based on the assessment of typologies that are broadly representative of the potential sites in the plan-making area and does not involve site specific assessments of viability or delivery.

**Table 1. Non-site specific development typologies tested in the Bath and North East Somerset Local Plan Partial Update Viability Study**

Site Ref	Development Typologies <sup>1</sup>	Land Use (AECOM Analysis)	Gross Site Area (Hectare)	Units	Density (Units per Hectare)	Retail Floorspace (sqm)	Supermarket Floorspace (sqm)	Office Floorspace (sqm)	Industrial Floorspace (sqm)
1	Very small housing scheme	Residential (House)	0.2	4	20				
2	Low density housing scheme	Residential (House)	0.6	15	25				
3	Small housing scheme	Residential (House)	0.25	9	36				
4	Medium density housing scheme	Residential (House)	0.38	15	39				
5	Medium density housing scheme	Residential (House)	0.7	25	36				
6	Higher density housing scheme	Residential (House)	0.5	30	60				
7	Low density flatted scheme	Residential (Flat)	0.2	25	125				
8	Medium density flatted scheme	Residential (Flat)	0.4	52	130				
9	High density flatted scheme	Residential (Flat)	0.2	30	150				
10	Higher density flatted scheme	Residential (Flat)	0.65	100	154				
11	Mixed use scheme 1	Mixed Use	0.17	25	147	500	500	2500	
12	Mixed use scheme 2	Mixed Use	0.17	56	329		1000		
13	Retail	Non-residential	0.61	0	0		1300		
14	Office	Non-residential	0.2	0	0			4500	
15	Industrial unit	Non-residential	0.67	0	0				4000

Source: Bath and North East Somerset Local Plan Partial Update Viability Study (August 2021)

<sup>1</sup> The Bath and North East Somerset Local Plan Partial Update Viability Study appraised a total of 19 development typologies, including 15 non-site specific development typologies summarised in Table 1 and four additional site allocations including Typology 16 Keynsham Safeguarded Land KE3B, Typology 17 Silver Street Midsomer Norton, Typology 18 Sion Hill Bath Spa University and Typology 19 St Martins Hospital.

## Stage 5 Capacity Estimate

3.35 For sites assessed as 'suitable, available and achievable (including potentially suitable, potentially available and potentially achievable)', their residential development potential has been estimated based on the following approach:

- Adjust Gross Developable Area: Reduce the gross developable area as appropriate to account for land intersecting with primary constraints and key ecological constraints, including priority habitats and Tree Preservation Orders;
- Apply Net Developable Area: Apply the net developable area by the density multiplier (Table 3) with an appropriate gross-to-net discount (Table 2). The discount aligns with the approach used in the WECA SHLAA 2021 and neighbouring authorities; and,
- Refine Capacity Estimate: Refine capacity estimate based on B&NES specialist inputs and other site-specific information, as necessary.

**Table 2. Gross to net ratio area multiplier**

Site Size	Gross to net ratio
<2 Ha proposed for 100% residential	0.9
2-10 Ha proposed for 100% residential	0.75
>10 Ha assumed for mixed use	0.5

3.36 No capacity estimate is provided for sites promoted for non-residential use including renewable energy generation, however the promoted capacity has been noted.

3.37 Paragraph 016 of the HELAA PPG recommends that the estimation of development capacity of each site can be guided by existing or emerging plan policy including locally determined policies on density. Further research shows that there is currently no established Local Plan policy, design guidance or viability advice on density multipliers in B&NES.

3.38 A set of density multipliers has been developed based on research of WECA SHLAA density assumptions and design led densities applied in the AECOM Strategic Planning Options work. These multipliers were applied to establish initial dwellings per hectare assumption based on the broad location of the site.

**Table 3. Density multiplier applied**

<b>WECA SHLAA Location Type</b>	<b>WECA SHLAA Density Assumptions (dwellings per hectare)</b>	<b>AECOM SPO design- led densities (dwellings per hectare)</b>	<b>B&amp;NES HELAA Location Type</b>	<b>B&amp;NES HELAA Adjusted Density Assumptions (dwellings per hectare)</b>
Central (Bristol City Centre)	200	N/A	N/A (Outside of Plan Area)	N/A (Outside of Plan Area)
Inner City (Bristol City)	100-120	N/A	N/A (Outside of Plan Area)	N/A (Outside of Plan Area)
Central and Inner Bath	100	N/A	Bath Central Area	100
Suburban Centres (High Streets and Transport Hubs)	70-85	N/A	Town Centre, District Centre and Local Centres (urban) in Bath	70
Market Town Centres				
Suburban (including urban extensions)	50-65	54-73 (Hicks Gate)	Areas outside of the Town Centre but within 400m of adopted Housing Development Boundaries	50
Market towns (outside centres including urban extensions)	50	40-50 (Keynsham and Salford)	Areas outside of the Town Centre but within 400m of adopted Housing Development Boundaries	50
New settlements	50-65	N/A	Standalone new settlements (>10 Ha)	50
Rural / villages	40	30-40 (Whitchurch Village and Somer Valley)	Rural areas	40

## **Stage 6: Deliverability assumptions**

- 3.39 The PPG requires an assessment of estimated build out rates and an indicative trajectory of anticipated development based on the evidence available. This has not been completed on the draft HELAA presented for the Options Consultation but will be completed for the publication Local Plan under Regulation 19.
- 3.40 Appendix C presents information on how the Council intends to assess these factors, including typical assumptions for when sites can be expected to come forward allowing for the plan-making and development management processes to take place and, where necessary, site allocations and Green Belt release (should the Council consider that exceptional circumstances exist). The assumptions can then be refined through consultation feedback.

## **4 Results**

- 4.1 The results of the assessments undertaken are set out in the map reports accompanying the draft HELAA methodology. They are organised by ward in Bath and by parish in the rest of the district. Some parishes do not have any sites that have been assessed. These are:
- Claverton parish
  - North Stoke parish
  - St Catherine parish
  - Ubley parish

## Appendix A – Discounted Sites

HELAA Ref	Site Address	Parish	Ward	Stage 1 Filtering Results
BC01	Land north of Ironmould Lane	Keynsham	Keynsham North	Site wholly falls outside of the Plan Area.
BC02	Hicks Gate	Keynsham	Keynsham North	Site wholly falls outside of the Plan Area.
BC03	Land between Stockwood Road and Durley Hill	Keynsham	Keynsham North	Site wholly falls outside of the Plan Area.
CAM02	Land at Quarry Cottages	Camerton	Bathavon South	Site is not capable of delivering 5 or more dwellings and fall below the minimum threshold for assessment.
CAM05	Land at 3 Meadgate	Camerton	Bathavon South	Site is not capable of delivering 5 or more dwellings and fall below the minimum threshold for assessment.
CLU11	Land to the south of 51 Upper Bristol Road	Clutton	Clutton & Farmborough	Site is not capable of delivering 5 or more dwellings and fall below the minimum threshold for assessment.
COM08	Land at Coombe Lane	Compton Martin	Chew Valley	Site is not capable of delivering 5 or more dwellings and fall below the minimum threshold for assessment.
HB02	Hinton Blewett 2	Hinton Blewett	Mendip	Site is not capable of delivering 5 or more dwellings and fall below the minimum threshold for assessment.
K61	Durley Park Lodge	Keynsham	Keynsham North	Site is not capable of delivering 5 or more dwellings and fall below the minimum threshold for assessment.
K68	9 Walnut Close	Keynsham	Keynsham South	Site is not capable of delivering 5 or more dwellings and fall below the minimum threshold for assessment.
KING07	Alexander House	Bath	Kingsmead	Site is not capable of delivering 5 or more dwellings and fall below the minimum threshold for assessment.
KING21	Salvation Army Hall	Bath	Kingsmead	Site is not capable of delivering 5 or more dwellings and fall below the minimum threshold for assessment.
LAM12	92 London Road West	Bath	Lambridge	Site is not capable of delivering 5 or more dwellings and fall below the minimum threshold for assessment.
LAN08	Land west of Burlington Street	Bath	Lansdown	Site is not capable of delivering 5 or more dwellings and fall below the minimum threshold for assessment.
LYN02	Land at Bear Flat	Bath	Widcombe & Lyncombe	Site is not capable of delivering 5 or more dwellings and fall below the minimum threshold for assessment.
MAR01	Land opposite Hunstete Cottage	Marksbury	Bathavon South	Site is not capable of delivering 5 or more dwellings and fall below the minimum threshold for assessment.
MDP22	Underhill Farm (Mendip DC)	Midsomer Norton	Midsomer Norton Redfield	Site wholly falls outside of the Plan Area.
MDP31b	Whitepost	Midsomer Norton	Midsomer Norton Redfield	The site predominantly falls outside of the Plan Area. Less than 0.1 Ha of the site falls within the Bath and North East Somerset authority boundary. The site does not adjoins other identified HELAA sites of assessment.
MSN02	Chesterfield House	Midsomer Norton	Midsomer Norton Redfield	Site is not capable of delivering 5 or more dwellings and fall below the minimum threshold for assessment.
MSN03	Martins Block	Midsomer Norton	Midsomer Norton Redfield	Site is not capable of delivering 5 or more dwellings and fall below the minimum threshold for assessment.

HELAA Ref	Site Address	Parish	Ward	Stage 1 Filtering Results
<b>MSN48</b>	5 Somer Ridge	Midsomer Norton	Midsomer Norton North	Site is not capable of delivering 5 or more dwellings and fall below the minimum threshold for assessment.
<b>NEW04</b>	Weston Lock/Brassmill Ln	Bath	Newbridge	Site is not capable of delivering 5 or more dwellings and fall below the minimum threshold for assessment.
<b>ODN05</b>	Land at 502 Wellsway	Bath	Odd Down	Site is not capable of delivering 5 or more dwellings and fall below the minimum threshold for assessment.
<b>PEA16</b>	land at Keel's Hill	Peasedown St. John	Peasedown	Site is not capable of delivering 5 or more dwellings and fall below the minimum threshold for assessment.
<b>RAD05</b>	Post Office	Radstock	Radstock	Site is not capable of delivering 5 or more dwellings and fall below the minimum threshold for assessment.
<b>RAD07</b>	Fortescue Road	Radstock	Radstock	Site is not capable of delivering 5 or more dwellings and fall below the minimum threshold for assessment.
<b>TWT10</b>	Phoenix House, LBR (Aldridges of Bath)	Bath	Twerton	Site is not capable of delivering 5 or more dwellings and fall below the minimum threshold for assessment.
<b>TWT11</b>	Rivers House	Bath	Twerton	Site is not capable of delivering 5 or more dwellings and fall below the minimum threshold for assessment.
<b>TWT13</b>	Mazda workshop	Bath	Twerton	Site is not capable of delivering 5 or more dwellings and fall below the minimum threshold for assessment.
<b>TWT14</b>	Bath Hand Car Wash, LBR	Bath	Twerton	Site is not capable of delivering 5 or more dwellings and fall below the minimum threshold for assessment.
<b>TWT15</b>	Rivertree House, LBR	Bath	Twerton	Site is not capable of delivering 5 or more dwellings and fall below the minimum threshold for assessment.
<b>TWT16</b>	Chameleon Court, LBR	Bath	Twerton	Site is not capable of delivering 5 or more dwellings and fall below the minimum threshold for assessment.
<b>WAL06</b>	Land rear of 6-10 Kensington Place (FZ3)	Bath	Walcot	Site is not capable of delivering 5 or more dwellings and fall below the minimum threshold for assessment.
<b>WES18</b>	Millmead garage,	Bath	Westmoreland	Site is not capable of delivering 5 or more dwellings and fall below the minimum threshold for assessment.
<b>WES21</b>	Land at Lower Bristol Road	Bath	Westmoreland	Site is not capable of delivering 5 or more dwellings and fall below the minimum threshold for assessment.
<b>WES22</b>	Avalon Buildings	Bath	Westmoreland	Site is not capable of delivering 5 or more dwellings and fall below the minimum threshold for assessment.
<b>WID24</b>	Carlton Gardens	Bath	Widcombe & Lyncombe	Site is not capable of delivering 5 or more dwellings and fall below the minimum threshold for assessment.
<b>WID29</b>	Bruton Avenue	Bath	Widcombe & Lyncombe	Site is not capable of delivering 5 or more dwellings and fall below the minimum threshold for assessment.
<b>WID30</b>	Chaucer Road	Bath	Widcombe & Lyncombe	Site is not capable of delivering 5 or more dwellings and fall below the minimum threshold for assessment.









## Price Point by Postcode

Affordable Housing Policy Area (% Target) <sup>2</sup>	Housing Submarket <sup>3</sup>	Postcode sector <sup>4</sup>	Location(s) <sup>5</sup>	All sales (per sqm) <sup>6</sup>	New build sales only (per sqm) <sup>7</sup>	Price Point <sup>8,9</sup>
AH Area 1 (40%)	Prime Bath	BA1 1	Central Bath	£5,332	£5,468	Price Point G
AH Area 1 (40%)	Prime Bath	BA1 2	Central Bath, Weston Park	£5,124	-	Price Point F
AH Area 2 (30%)	Bath North and West	BA1 3	Central Bath, Newbridge, Locksbrook	£4,742	£6,461	Price Point I
AH Area 2 (30%)	Bath North and West	BA1 4	Bath (Weston, Weston Park)	£4,250	-	Price Point D
AH Area 1 (40%)	Bath North and East	BA1 5	Bath (Walcot, Landsdown, Beacon Hill)	£5,919	£7,305	Price Point I
AH Area 1 (40%)	Bath North and East	BA1 6	Bath (Larkhall, Grosvenor)	£4,364	-	Price Point D
AH Area 1 (40%)	Bath North and East	BA1 7	Bath (Bathford, Beatheaston, Shockerwick)	£4,182	£4,011	Price Point D
AH Area 1 (40%)	Bath Rural Hinterland	BA1 8	Upper Swainswick, Langridge	£5,147	-	Price Point F
AH Area 1 (40%)	Bath Rural Hinterland	BA1 9	Upper Langridge, North Stoke, Kelston	£4,964	£4,945	Price Point F

<sup>2</sup> Adopted Local Plan and AECOM GIS Analysis

<sup>3</sup> Adopted Local Plan and AECOM GIS Analysis

<sup>4</sup> Table 4.11.1 Residential sales values by postcode sector (per square metre) of the LPPU Viability Study

<sup>5</sup> Table 4.11.1 Residential sales values by postcode sector (per square metre) of the LPPU Viability Study

<sup>6</sup> Table 4.11.1 Residential sales values by postcode sector (per square metre) of the LPPU Viability Study

<sup>7</sup> Table 4.11.1 Residential sales values by postcode sector (per square metre) of the LPPU Viability Study

<sup>8</sup> AECOM Analysis based on new build sales value (where available) and all sales value.

<sup>9</sup> Several postcode sectors are not included as part of the LPPU Viability Study analysis and therefore the nearest settlement price point have been assumed for specific sites, including:

- Price Point A: K60 (BS14 8NE)
- Price Point B: RAD26 (BA3 5UB), RAD28 (BA3 5SQ), RAD40 (BA3 5TU), S1PS20 (BS14 8NE), WCH12 (BS14 8SL), WCH13 (BS14 8), WCH13a (BS14 8), WCH14 (BS14 8), WF36a (BA3 5) and WF36c(BA3 5)
- Price Point C: K58 (BS15 3NR), S1PS24 (BS14 9PJ)
- Price Point D: NT01 (BS40 5TS)

Affordable Housing Policy Area (% Target) <sup>2</sup>	Housing Submarket <sup>3</sup>	Postcode sector <sup>4</sup>	Location(s) <sup>5</sup>	All sales (per sqm) <sup>6</sup>	New build sales only (per sqm) <sup>7</sup>	Price Point <sup>89</sup>
<b>AH Area 1 (40%)</b>	Bath Rural Hinterland	<b>BA2 0</b>	Timbsbury, Tynning, Meadgate, Camerton, Amesbury	£3,259	£3,246	<b>Price Point B</b>
<b>AH Area 2 (30%)</b>	Bath South	<b>BA2 1</b>	Bath (Whiteway)	£3,502	-	<b>Price Point B</b>
<b>AH Area 2 (30%)</b>	Bath South	<b>BA2 2</b>	Bath (Odd Down, Moorlands, Rush Hill)	£3,834	-	<b>Price Point C</b>
<b>AH Area 2 (30%)</b>	Bath South	<b>BA2 3</b>	Bath Central, Oldfield Park, Westmoreland, East Twerton	£4,199	£6,489	<b>Price Point I</b>
<b>AH Area 1 (40%)</b>	Prime Bath	<b>BA2 4</b>	Central Bath, Lynchcombe Vale, Bathwick	£5,016	-	<b>Price Point F</b>
<b>AH Area 2 (30%)</b>	Bath South	<b>BA2 5</b>	Bath South (Combe Down)	£4,531	£4,305	<b>Price Point D</b>
<b>AH Area 1 (40%)</b>	Bath North and East	<b>BA2 6</b>	Bath East, Bathampton, Claverton Down	£5,270	£5,377	<b>Price Point G</b>
<b>AH Area 1 (40%)</b>	Bath Rural Hinterland	<b>BA2 7</b>	Monkton Combe, Claverton Down, Southstoke, Hinton Charterhouse	£5,041	£6,517	<b>Price Point I</b>
<b>AH Area 2 (30%)</b>	Midsomer Norton, Westfield, Radstock, Peasedown St John and Paulton	<b>BA2 8</b>	Peasedown St John, Shoscombe	£3,255	-	<b>Price Point B</b>
<b>AH Area 1 (40%)</b>	Bath Rural Hinterland	<b>BA2 9</b>	Corston, Marksbury	£3,295	-	<b>Price Point B</b>
<b>AH Area 2 (30%)</b>	Midsomer Norton, Westfield, Radstock, Peasedown St John and Paulton	<b>BA3 2</b>	Radstock, Midsomer Norton	£3,104	£3,257	<b>Price Point B</b>
<b>AH Area 2 (30%)</b>	Midsomer Norton, Westfield, Radstock, Peasedown St John and Paulton	<b>BA3 3</b>	Radstock	£2,894	-	<b>Price Point A</b>
<b>AH Area 2 (30%)</b>	Midsomer Norton, Westfield, Radstock, Peasedown St John and Paulton	<b>BA3 4</b>	Radstock, Midsomer Norton	£3,216	£3,501	<b>Price Point B</b>
<b>AH Area 2 (30%)</b>	Chew Valley	<b>BS14 0</b>	Whitchurch	£3,683	£3,523	<b>Price Point B</b>

Affordable Housing Policy Area (% Target) <sup>2</sup>	Housing Submarket <sup>3</sup>	Postcode sector <sup>4</sup>	Location(s) <sup>5</sup>	All sales (per sqm) <sup>6</sup>	New build sales only (per sqm) <sup>7</sup>	Price Point <sup>89</sup>
<b>AH Area 2 (30%)</b>	Keynsham and Salford	<b>BS31 1</b>	Keynsham	£3,598	£4,026	<b>Price Point D</b>
<b>AH Area 2 (30%)</b>	Keynsham and Salford	<b>BS31 2</b>	Keynsham	£3,564	£3,975	<b>Price Point C</b>
<b>AH Area 2 (30%)</b>	Keynsham and Salford	<b>BS31 3</b>	Saltford	£4,143	-	<b>Price Point D</b>
<b>AH Area 2 (30%)</b>	Chew Valley	<b>BS39 4</b>	Publow, Pensford, Compton Dando, Stanton Drew	£3,889	£3,874	<b>Price Point C</b>
<b>AH Area 2 (30%)</b>	Chew Valley	<b>BS39 5</b>	Bishop Sutton, Clutton, Temple Cloud,	£3,724	£3,240	<b>Price Point B</b>
<b>AH Area 2 (30%)</b>	Chew Valley	<b>BS39 6</b>	High Littleton, Farrington Gurney	£3,189	-	<b>Price Point A</b>
<b>AH Area 2 (30%)</b>	Midsomer Norton, Westfield, Radstock, Peasedown St John and Paulton	<b>BS39 7</b>	Paulton	£2,985	£3,004	<b>Price Point A</b>

Source: Adopted Local Plan, Table 4.11.1 Residential sales values by postcode sector (per square metre) of the LPPU Viability Study and AECOM Analysis

## **Appendix C - B&NES HELAA Deliverability assumptions**

# B&NES HELAA Deliverability assumptions

## HELAA typologies

B&NES has produced a draft updated HELAA to accompany the Regulation 18 consultation in early 2024. The HELAA uses a number of ‘typologies’ to calculate the development capacity of sites in the District which reflect the nature, size and density of sites. The table below outlines the typologies with commentary on their characteristics.

**Table 1. B&NES HELAA typologies**

Typology	Greenfield / brownfield	Size	Density	Dwelling capacity	Mix
Bath Central Area	Brownfield	Under 1ha	100dph	Under 100	Flatted development
Town Centre	Brownfield	Under 2ha	70dph	Under 100	Mix of flats and houses
Suburban and Market Towns	Mix	Up to 10ha	50dph	Up to 400	Predominantly houses
Rural Areas	Greenfield	Up to 5ha	40dph	Up to 200	Predominantly houses
New Settlement	Greenfield (with some brownfield)	Up to 100ha	50dph	Up to 2,750	Mix

Source: B&NES draft HELAA 2024

As can be seen from the table above there is a wide mix of sites and typologies within the District. The Planning Practice Guidance<sup>1</sup> states that the ‘final evidence base’ of a HELAA is expected to include “an indicative trajectory of anticipated development based on the evidence available”. It is therefore necessary to develop housing trajectory assumptions for the individual sites building on the typologies listed above. These trajectories can then be aggregated to form an indicative HELAA housing trajectory over the new plan period.

The trajectories assumptions for the typologies need to include the lead-in times (the time taken from allocation in a plan to first dwelling completion) and the build out rates (the number of dwellings completed per annum) factoring in the above characteristics.

## Existing assumptions in 5YHLS and monitoring data

B&NES publishes its housing monitoring information on an annual basis through its Housing Trajectory. The latest available trajectory is the 2023 trajectory<sup>2</sup>.

The trajectory covers the period since the base date of the Core Strategy; i.e. from 1<sup>st</sup> April 2011 to the present day. The base date of the trajectory is 1<sup>st</sup> April 2023. The trajectory contains both historic data (completions) and forecast completions for the period 2023/14 onwards. Where forecast data is used this has been stated.

The trajectory covers the main policy areas of Bath, Keynsham, Somer Valley, Rural Areas and Whitchurch and includes strategic sites (underpinned by development plan allocations) and other ‘windfall’ developments that have come forward through the development management process.

Brief commentary is provided on the data available however further information is provided for strategic site allocations using the public Planning Application Search. Strategic scale sites are built across multiple monitoring years, therefore

<sup>1</sup> Reference Paragraph: 026 Reference ID: 3-026-20190722 available here: <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment#method--stage-5-final-evidence-base>

<sup>2</sup> Available here: <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment#method--stage-5-final-evidence-base>

there is a need to look at completions per annum and how many outlets operate at the site. Planning Application Search has been used to identify the date of validation, date of permission (usually an outline for such large sites) and how long it has taken for the first completion to take place. The following development plan documents have been used:

- B&NES Local Plan Adopted October 2007.
- B&NES Core Strategy Adopted July 2014.
- Placemaking Plan Adopted July 2017.

Following the structure of the housing trajectory, below is a commentary for each of the policy areas. Detailed data relating to the strategic sites is available in **Appendix 1**.

## Bath

The Bath area contains predominantly brownfield sites which are higher density with a higher proportion of flatted developments, plus some student accommodation. They are generally built out in a single year due to their scale and the nature of the development (flats come forward in one 'phase' compared to housing schemes where the houses are completed individually).

A small number of greenfield sites are included in the data which have either been built out, or are assumed in the future to be built out, around 50dpa.

Two strategic sites have been looked at in further detail in Table 2, Bath Western Riverside and the MOD Foxhill/Mulberry Park site.

**Table 2. Bath strategic sites**

Site	PDL / GF	Allocation date	Validated date	Approval date	Years from validation to first completion	Build-out rate (dpa)	Average dpa	Comment
Bath Western Riverside	P	Oct 2007	May 2006	Dec 2010	5 years	2011/12: 59 2012/13: 147 2013/14: 93 2014/15: 61 2015/16: 163 2016/17: 154 2017/18: 45 2018/19: 52 2019/20: 52	91	Allocated by Policy GDS.1/B1 of the Bath and North East Somerset Local Plan (October, 2007). This policy is supported by a Master Plan Supplementary Planning Document (March, 2008). This is a complex site but significant planning progress has been made with the delivery of phase I commencing in December 2010. Outline planning application 06/01733/EOUT validated 12/05/2006 and issued 23/12/2010. Crest Nicholson. Submitted prior to formal plan adoption.
MOD Foxhill / Mulberry Park	P	Jul 2017	Sep 2014	Mar 2015	2 years	2016/17: 8 2017/18: 110 2018/19: 120 2019/20: 86 2020/21: 70 2021/22: 88 2022/23: 58	77	MOD Foxhill was allocated in the Placemaking Plan in 2017 after initially being identified as a broad location in the Core Strategy 2014. Permission was granted in 2015. Foxhill – up to 700 dwellings, a new primary school, 500 sq.m. retail and 1,000 sq.m. office space permitted in outline (of which 276 dwellings in full). Application 14/04354/EOUT validated 25/09/2014 and approved 30/03/2015. Curo and Bellway. Application submitted prior to formal plan allocation.

Source: B&NES Housing Trajectory

Bath Western Riverside was supported by a Local Plan allocation and an SPD in March 2008. Crest Nicholson built out the scheme consisting of a mix of flats and houses with an average of 91 dwellings per annum, peaking in 2015/16 and 2016/17 at 163 and 154 dwellings respectively. The application was submitted prior to formal plan adoption with a 5-year lead-in.

The MOD Foxhill/Mulberry Park site was identified as a broad area in the 2014 Core Strategy and not formally allocated until the Placemaking Plan in July 2017. An application was submitted prior to formal allocation and took 2 years from validation to the first completion. Delivery of the mixed use scheme was by Curo and Bellway with an average of 77dpa.

## Keynsham:

The Keynsham area data contains a large number of small and medium-sized brownfield sites within the urban area. The designation of Green Belt around the town means that the greenfield sites that have come forward have been allocated sites in the development plan.

The brownfield sites are generally built out in a single year. The greenfield strategic site allocations have required Green Belt release to allow them to come forward, however Somerdale as a part brownfield site was submitted prior to formal allocation. K2b took the longest to come forwards as it was consented on appeal; whilst KE4 required an agreed masterplan before Persimmon and Bloor could submit applications for their land.

Table 3 provides further information however an assumption of a build-out rate of 50-80 dwellings per annum at strategic greenfield sites appears justified with 1-2 outlets with a 3-year lead-in time post plan allocation (releasing the site from the Green Belt).

**Table 3. Keynsham strategic sites**

Site	PDL / GF	Allocation date	Validated date	Approval date	Years from validation to first completion	Build-out rate (dpa)	Average dpa	Comment
South West Keynsham K2b	G	Oct 2007	Nov 2009 (2 years 1 month after allocation)	Jul 2011 (allowed on appeal)	4 years	2013/14: 36 2014/15: 62 2015/16: 66 2016/17: 83 2017/18: 38	57	The 2007 Local Plan allocations include the 500+ dwelling development in South West Keynsham known as 'K2'. Development requirements are outlined in the Local Plan, including the need for satisfactory vehicular accesses. 700 dwellings are directed towards the town centre/Somerdale policy area (Policy KE2) which will serve as the focus of future development within Keynsham. 09/04351/FUL allowed on appeal 22nd July 2011. Application validated 13/11/2009. Taylor Wimpey
South West Keynsham K2a	G	Oct 2007	Jan 2014 (7 years 3 months after allocation)	Feb 2014	2 years	2015/16: 30 2016/17: 105 2017/18: 100 2018/19: 29 2019/20: 7	54	The Local Plan allocations include the 500+ dwelling development in South West Keynsham known as 'K2'. Development requirements are outlined in the Local Plan, including the need for satisfactory vehicular accesses. 700 dwellings are directed towards the town centre/Somerdale policy area (Policy KE2) which will serve as the focus of future development within Keynsham. Application 14/00049/FUL validated 07/01/2014 and approved 05/02/2015. Barratt and David Wilson.
Keynsham Somerdale	Mix	Jul 2014	Apr 2013	Feb 2014	2 years	2014/15: 25 2015/16: 48 2016/17: 90 2017/18: 235 2018/19: 71 2019/20: 75 2020/21: 81 2021/22: 46 2022/23: 37	79	Allocated 2014 Core Strategy. Mixed use, part PDL. Application 13/01780/EOUT validated 19/04/2013. Decision made 14/02/2014. Taylor Wimpey and St Monicas. Application submitted prior to formal plan adoption.
South West	G	Jul 2014	Sep 2015 (1 year 2 months)	Aug 2017	3 years	2018/19: 35 2019/20: 66 2020/21: 90	50	Removed from the Green Belt and allocated for development in the 2014 Core Strategy. Comprehensive

Site	PDL / GF	Allocation date	Validated date	Approval date	Years from validation to first completion	Build-out rate (dpa)	Average dpa	Comment
Keynsham KE4			after allocation)			2021/22: 11		masterplan for both phases approved under 15/00006/CONSLT validated 22/05/2015 and approved 13/08/2015. 15/04290/FUL received 22/09/2015 and approved 02/11/2017. 16/02077/FUL validated on 29/04/2016 and approved 18/08/2017. Persimmon and Bloor
East of Keynsham KE3a	G	Jul 2014	Feb 2016 (1 year 7 months after allocation)	Oct 2017	3 years	2018/19: 4 2019/20: 42 2020/21: 73 2021/22: 44 2022/23: 58	44	Removed from the Green Belt and allocated for development in the 2014 Core Strategy. 16/00850/OUT validated 23/02/2016 approved 04/10/2017. Crest Nicholson

Source: B&NES Housing Trajectory

## Somer Valley:

The Somer Valley area is, at the B&NES level, a relatively lower viability area with a significant industrial past that has resulted in the availability of brownfield land for development and regeneration. Beyond the strategic allocations (outlined in Table 4) the sites that have come forward have been small and medium sized with single developers building out up to 50dpa.

The Somer Valley is beyond the Green Belt and whilst the Council could not demonstrate a five-year housing land supply some small-scale greenfield sites have come forward speculatively without allocations. On such sites a single outlet around 50dpa for those large enough to be built across monitoring years.

**Table 4. Somer Valley strategic sites**

Site	PDL / GF	Allocation date	Validated date	Approval date	Years from validation to first completion	Build-out rate (dpa)	Average dpa	Comment
Radstock Railway Land	P	Oct 2007	Aug 2006	Mar 2008	8 years	2014/15: 18 2015/16: 52 2016/17: 26 2017/18: 81 2018/19: 12	38	Allocated in Saved Local Plan Policy Norton-Radstock Site NR2. Approved under 06/02880/EOUT validated 22/08/2006 and approved 31/03/2008. Linden
Polestar, Paulton	P	Oct 2007 (some completions pre-2011 from an earlier phase under 99/02662/OUT)	Aug 2007	Jul 2010	4 years (data provided for the allocated phase only)	2011/12: 34 2012/13: 46 2013/14: 38 2014/15: 60 2015/16: 65 2016/17: 33 2017/18: 38 2018/19: 38 2019/20: 58 2020/21: 8 2021/22: 30 2022/23: 8	38	Allocated in Saved Local Plan Policy Site V3 Paulton Printing Factory. Some historic permissions prior to allocation (99/02662/OUT). Remainder under 07/02424/EOUT validation 03/08/2007; decision made 01/07/2010. Barratt and Bovis

Source: B&NES Housing Trajectory

The Radstock Railway Land was a brownfield site allocated in 2007 with approval taking place before the Global Financial Crisis. After an 8-year lead-in time it was built out by Linden at an average of 38dpa.

The Polestar allocation at Paulton built on an existing residential planning permission under 99/02662/OUT and took 4 years for the first completion after validation, during which the Global Financial Crisis occurred. Once underway the development was built out over a number of years at an average of 38dpa.

## Rural

The Rural area contains no strategic allocations other than at Whitchurch on the Bristol fringe. There is little brownfield land in the Rural Area which incorporates some Green Belt land and some areas beyond the Green Belt. Similar to the Somer Valley some greenfield land has been consented on appeal, but the sites have generally not been big enough to be built out across multiple monitoring years. For those that are an assumption of around 25dpa seems appropriate.

The sites tend to be full permissions (rather than outlines) as they are smaller sites, and there are higher numbers of SME developers progressing these sites. The Whitchurch allocation sites were built out at a maximum of 50dpa at their peak.

## Comparator assumptions

The above monitoring data looks at completions data within the B&NES administrative area from a relatively small sample size. It is therefore also helpful to look at other comparator areas to see what typical assumptions are used in other local planning authority areas.

AECOM has experience of developing lead-in time and build-out rate assumptions for other LPAs. Between 2020 and 2022 AECOM supported Greater Cambridge Shared Planning (on behalf of Cambridge City Council and South Cambridgeshire District Council) to produce a Housing Delivery Study<sup>3</sup> (interim findings, 2020); the Housing Delivery Study<sup>4</sup> (Final Report, 2021) and an Addendum<sup>5</sup> (2022). This report looked at the national research on housing delivery, market absorption, lead-in times and build-out rates and undertook primary research by interrogating the monitoring database and engaging with the development industry to develop locally appropriate assumptions to underpin plan-making. The Greater Cambridge area has similar characteristics to B&NES given heritage constraints at the top-tier settlement; Green Belt; high development prices and house prices; and demand for student and tourist accommodation. The main difference arises in the Somer Valley which as a former mining and industrial area is not comparable to Cambridge.

The research is not repeated here and was based on monitoring data prior to the Covid-19 pandemic; however the conclusions of this national research and analysis of local data are noteworthy for B&NES and are presented below.

Site Size	Plan adoption to submission*	Submission to Approval**	Approval to first Completion	Average build-out rate	Average outlets	Peak build-out rate	Peak outlets
200-499	2 years	4	2	50	1	50	1
500-999	2 years	4	2	90	1-2	100	2
1000-1499	3 years	4	2	120	2-3	150	3
1500-1999	3 years	4	2	145	3-4	200	4
2000+ New Settlement	3 years	4	2	200-250	4-5	300	5
2000+ Urban Extension	3 years	4	2	225-275	5	350	7

\*N.B. this assumes the preparation of some form of supplementary guidance such as a masterplan, design guide/code or Supplementary Planning Document (SPD) to guide strategic developments of >200 dwellings. This timeframe could be reduced where no supplementary guidance or Green Belt release is required prior to submission of an application.  
 \*\* Approval is defined as a legally implementable permission for example following approval of Reserved Matters. It is assumed that strategic site promoters will typically seek outline planning approval. However, it is acknowledged that some smaller sites in the 200-499 range could be brought forward for full planning and time savings would be achievable. This should be assessed on a case by case basis (where appropriate).

**Figure 1: Greater Cambridge Strategic Site lead-in time and build-out rate assumptions (source: Greater Cambridge Housing Delivery Study 2021).**

For strategic scale sites it was found that the number of outlets increased above 500 dwellings with 3 outlets on sites of 1000 dwellings or more. The Council’s requirement to adopt a Supplementary Planning Document or other guidance lengthened the lead-in time however it provided further certainty for the development industry. Larger sites had longer lead-in times taking into account the additional complexity of planning for such developments. Urban extensions were

<sup>3</sup> Available at: <https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-08/gclp-strategic-spatial-options-assessment-housing-delivery-study-nov2020.pdf>

<sup>4</sup> Available at: <https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-10/Housing%20Delivery%20Study%20for%20Greater%20Cambridge%20%28AECOM%2C%20October%202021%29.pdf>

<sup>5</sup> Available at: <https://consultations.greatercambridgeplanning.org/sites/gcp/files/2023-01/EBGCLPDSUHDSAAdmJan23v1Jan23.pdf>

built out more quickly than new settlement options as they had a greater ability for the market to absorb them, drawing on higher market demand and the availability of existing infrastructure, and could be built out as a mix of higher density flats, build-to-rent, affordable housing and market housing compared to lower density sites in more distant locations where market demand was currently lower.

Crucially for the larger sites with multiple outlets the evidence showed that it was appropriate to consider assumptions for a ‘peak’ in the middle of the build-out. The combination of lead-in times, built-out rates and assumptions for a ‘peak’ are shown in Figures 2 and 3 below, assuming an April 2025 plan adoption date.

**Table 19: Strategic site build-out rate phasing assumptions example**

Size band	Y 1	Y 2	Y 3	Y 4	Y 5	Y 6	Y 7	Y 8	Y 9	Y 10	Y 11	Y 12	Y 13	Y 14	Y 15	Y 16	Y 17	Y 18	Y 19	Y 20	Total	Average dpa	Equivalent outlets
200-499	50	50	50	50	50																250	50	1.0
500-999	50	100	100	100	100	100	50														600	86	1.7
1000-1499	50	100	150	150	150	150	150	150	100	50											1200	120	2.4
1500-1999	50	100	150	200	200	200	200	200	150	100	50										1600	145	2.9
2000+ NS	50	100	150	200	250	300	300	300	300	300	300	300	300	300	250	200	150	100	50		4500	225	4.5
2000+ SUE	50	150	250	350	350	350	250	150	50												2300	230	4.6

Source: AECOM Analysis

**Figure 2: Greater Cambridge strategic site build-out rate phasing assumptions**

**Table 20: Example strategic site trajectories (including lead-in time post adoption, assumed April 2025)**

Size band	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	40/41	Total in plan period	Peak dwellings per year	Average dwellings per year
200-499	-	-	-	-	-	-	-	-	-	-	-	-	50	50	50	50	50	-	-	-	-	250	50	50
500-999	-	-	-	-	-	-	-	-	-	-	-	-	50	100	100	100	100	100	50	-	-	600	100	86
1000-1499	-	-	-	-	-	-	-	-	-	-	-	-	50	100	150	150	150	150	150	150	150	1050	150	131
1500-1999	-	-	-	-	-	-	-	-	-	-	-	-	50	100	150	200	200	200	200	200	200	1300	200	163
2000+ NS	-	-	-	-	-	-	-	-	-	-	-	-	50	100	150	200	250	300	300	300	300	1650	300	206
2000+ SUE	-	-	-	-	-	-	-	-	-	-	-	-	50	150	250	350	350	350	350	250	250	2100	350	263

Source: AECOM Analysis

**Figure 3: Greater Cambridge example strategic site trajectories (assuming an April 2025 plan adoption date)**

Looking at sites below 200 dwellings (which make up the majority of completions in B&NES) Greater Cambridge monitoring data showed that the following assumptions would be appropriate. This incorporates the fact that smaller and medium-sized sites are likely to be full applications and built-out within a single year. Outline applications (which take longer to become an ‘implementable’ permission through subsequent approval of reserved matters) are generally sought for schemes above 200 dwellings in urban Cambridge and 50 dwellings elsewhere. The 75dpa build-out rate where flats are included; and 40-50dpa build-out for housing-only schemes accords with the data in B&NES.

**Table 21: Non-strategic site lead-in time and build-out rate assumptions, by HELAA typology**

Typology	Density	Low	Low-Medium	Medium-High	High	GCSP Monitoring category	Lead-in times (submission to first completion) - Full	Lead-in times (submission to first completion) - Outline	Build-out rate flats	Build-out rate houses	Notes
Central	75-225dph	75	125	175	225	Cambridge Urban Area (City) (flats)		3	5 All built in one year	N/A	Assume outline permission sought only on the largest sites (200+ dwellings)
Suburban	40-120dph	40	60	90	120	Cambridge Urban Area (City) (flats and houses mix)		3	5 75dpa houses and flats mix	75dpa houses and flats mix	Assume outline permission sought only on the largest sites (200+ dwellings)
Suburban	40-120dph	40	60	90	120	Cambridge Urban Area (City) (houses)		3	5 N/A	50dpa	Assume outline permission sought only on the largest sites (200+ dwellings)
Rural connected	30-80dph	30	40	60	80	Rural Centre (South)		3	4 All built in one year	40dpa	Assume outline if larger than 50 dwellings
Rural minor/group	30-40dph	n/a	30	40	n/a	Minor Rural Centre (South)	3	4	N/A	40dpa	Assume outline if larger than 50 dwellings
Rural Infill	15dph	15	n/a	n/a	n/a	Infill Village (South)	3	-	N/A	All built out in one year (small sites only)	Applications of this size unlikely to be made in outline
Large city edge / infill (<200 dwellings)	50-150dph	50	70	100	150	Edge of Cambridge (City), Cambridge Urban Area (South)	4	6	All built in one year	40dpa	Assume outline if larger than 50 dwellings

Figure 4: Greater Cambridge non-strategic site lead-in time and build-out rate assumptions

## Recommended draft assumptions for the draft HELAA publication for Reg 18

Taking into account the monitoring data and the evidence from the broadly comparable area of Greater Cambridge, which in turn was informed through national research; it is suggested that the following assumptions are used as a starting point for a housing trajectory for the HELAA. They should be consulted on at Regulation 18 as typical assumptions for when sites can be expected to come forward allowing for the plan-making and development management processes to take place and, where necessary, site allocations and Green Belt release (should the Council consider that exceptional circumstances exist). The assumptions can then be refined through consultation feedback. It should be noted that the assumptions are deliberately developed to be realistic but site-specific factors can have a significant bearing on the actual delivery of sites; and therefore they should be seen as a guideline that is further refined as more information about sites comes to light.

**Table 5. B&NES HELAA typologies**

Typology	Site Size	Density	Mix	Plan adoption to submission of application (if allocated)	Lead-in times (submission to first completion) – Full (up to 50 dwellings)	Lead-in times (submission to first completion) – Outline (more than 50 dwellings)	Build-out rate
Bath Central Area	Under 1ha	100dph	Flatted development	2	3	N/A	All built in one year. 100dpa
Town Centre	Under 2ha	70dph	Mix of flats and houses	2	3	N/A	All built in one year. 75dpa
Suburban and Market Towns	Up to 10ha	50dph	Predominantly houses	2	3	5	50dpa
Rural Areas (Strategic – Somer Valley)	Up to 5ha	40dph	Predominantly houses	2	3	5	40dpa
Rural Areas (non-strategic)	Up to 2ha	40dph	Predominantly houses	2	3	5	25dpa
New Settlement	Up to 100ha	50dph	Mix	3	N/A	6	50dpa

## Appendix 1 B&NES Monitoring data

Area	Site	Reference	PDL/ GF	Affordable Housing	Total	Allocation date	Validated	Approved	Date from allocation to application	Years from validation to first completion	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	Post plan period 29/30	Total	Average completed DPA	Average all time DPA	Notes	
Bath	Bath Western Riverside	BWR: B3, B4, B10, B10a, B7, B8 (Crest)	P	121	299						59	147	93																299	100	100			
Bath	Bath Western Riverside	BWR: B17 (Crest)	P	55	55								55																55	55	55			
Bath	Bath Western Riverside	BWR: B1 & B2 (Crest)	P	0	26									24	2														26	13	13			
Bath	Bath Western Riverside	BWR: B6, B12 (Crest)	P	0	38								6	26	6														38	13	13			
Bath	Bath Western Riverside	BWR: B11, B13, B15a, B15b (Crest)	P	62	259										113	146													259	130	130			
Bath	Bath Western Riverside	BWR: B5 (Crest)	P	0	45												45												45	45	45			
Bath	Bath Western Riverside	BWR: B16 (Crest)	P	0	52																								52	52	52			
Bath	Bath Western Riverside	BWR: B40 (Crest)	P	0	45																								52	52	52			
Bath	Bath Western Riverside	BWR: OPA.1 'red and pink land' (St William)	P	105	480																				120	120	120	120	120	120	600	0	120	
Bath	Bath Western Riverside	BWR: OPA.1 'red and pink land' (BANES)	P		200																						100	100	100	300	0	100		















