



Bath and North East Somerset Local Plan Partial Update

Matter 4 Area Policies and Allocations

June 2022



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MATTER 4: AREA POLICIES AND ALLOCATIONS

Policy SB23 Weston Island

Q23 Is there a realistic prospect that the bus depot will be relocated within the plan period and if not, would Policy SB23 be effective and is it justified?

Q24 What is the evidence that the existing employment uses such as those within sites SB3 and SB6 would be likely to relocate to the site? Would the Plan be effective in facilitating this?

- 1.1.1 The Council have provided no evidence to support the basis that the bus depot is going to be relocated beyond fleeting reference within Policy SB23 and its supporting text. Indeed, no evidence on the availability and deliverability of the site has been provided within the LPPUs supporting documentation.
- 1.1.2 Furthermore, it is not clear if the current occupiers of Weston Island (First Bus) have been consulted regarding the proposed allocation as nothing has been published to justify the allocation in the form of correspondence or a Statement of Common Ground (SOCG).
- 1.1.3 The inclusion of SB23 and subsequent proposal to relocate the employment uses to Weston Island appears to simply be a means to justify and demonstrate the deliverability of Sites SB3 and 6 which face significant deliverability issues and have been subject to significant delay in the delivery of their proposed uses since the adoption of current plan.
- 1.1.4 According to the March 2014 SHLAA update (CD12/21A from the Core Strategy Examination) the site was anticipated to deliver 70 dwellings over the 2021/22 monitoring years, while subsequent annual monitoring trajectories (2017, 2018, 2019 and 2020) show the site delivery 60 dwellings in 2027/28. However, the March 2021 trajectory anticipates first delivery in 2028/29 with 40 dwellings being delivered in 2029/30.

- 1.1.5 In addition, the Council have provided no evidence that the existing employment uses on SB3 and 6 would be likely to relocate to the site, nor does the viability assessment consider the costs and implications of having to deliver the infrastructure discussed within the LPPU and SA.
- 1.1.6 The allocation of SB23 appears to be the Council 'papering over the cracks' in the strategy and site allocation of the current adopted Plan and Gladman consider that the Council should be undertaking a full review of the Local Plan to address delivery issues within the strategy which have arisen since adoption.

Policy SB25 St Martin's Hospital

Q35 What is the evidence that the proposed allocation would be deliverable or developable in terms of the NPPF within the plan period?

- 1.1.7 Gladman consider that no evidence that Policy SB25 is deliverable or developable has been provided to support and justify its inclusion within the Local Plan.
- 1.1.8 The only commentary available to support the site is the 2021 HELAA which provide a 'technical assessment of sites that could potentially contribute towards the future supply of housing and employment land and other uses'.
- 1.1.9 Two sites in relation to St Martin's Hospital campus are assessed under references LYN03 and 04. While the report notes they have 'secondary potential' in regard to suitability it highlights that the availability and achievability of the site is not proven and notes the significant constraints of the World Heritage Site.
- 1.1.10 The 2021 Sustainability Appraisal goes slightly further and states the following:

"The site is currently owned by NHS Property Services. Some areas of the site, namely the clinical buildings to the south-east, continue to play an important role in the NHS's clinical facilities requirement. However, some buildings within the site are expected to soon be declared surplus to the operational healthcare requirements of the NHS by local health commissioners, and are therefore being released for use as housing. The policy requires that the continued use of the south-eastern section of the site for clinical health services is facilitated."

1.1.11 Gladman reiterate that there is no evidence to demonstrate the availability, deliverability or suitability of the site to be allocated for residential development or to meet NPPF guidance.

Policy KE3C: East of Keynsham

Q58 Is criterion 1 which states that development proposals will deliver residential development of around 210 dwellings in the plan period justified?

Q.59 What is the evidence that 210 dwellings would be delivered by 2029?

1.1.12 Gladman do not dispute the long-term deliverability of the site due to the historic and wider planning context of the site. However, no evidence of deliverability, lead-in times or delivery rates have been provided to support the inclusion of the site as a proposed allocation.

1.1.13 The Council's response to the Inspector's Initial Questions provides deliverability proformas for sites expected to deliver and contribute to the five-year housing land supply on adoption of the LPPU. However, no evidence has been included to demonstrate the deliverability of Policy KE3C within the plan period.

Policy KE3D: East of Keynsham Safeguarded Land

Q63 Is criterion 1 which states that development proposals will deliver residential development of around 70 dwellings in the plan period justified?

Q.64 What is the evidence that 70 dwellings would be delivered by 2029?

1.1.14 Gladman reiterate comments made in response to Policy KE3C and Questions 58 and 59.

Policy SSV22 Former Paulton Printworks

Q74 What is the justification for the provision of an early years facility on land parcel 3, how would it be delivered/funded and what if any effect would this requirement have on the viability of the proposed allocation?

1.1.15 The Council have not provided evidence within the LPPU process and evidence base which highlights or demonstrates that there is currently a deficiency of early years

provision in Paulton or indeed a market demand. However, the Council's Childcare Sufficiency Assessment (September 2021 Update) suggests that there are currently 0.79 childcare places per eligible 3-4 year olds within Paulton and therefore there is insufficient places within the area. This assessment only covers those eligible for funded places within the district. The provision of 0-3 year old places is currently unknown.

- 1.1.16 The provision of early years childcare does work differently to primary school provision, given that parents have more choice over where they decide to send their children to learn and some parents do decide not to send their children to an early year's facility. Parents may choose early years facilities which are closer to their workplace rather than home which will change the distribution of children. Parents often choose a private pre-school setting given they will have sent their child to a nursery from earlier than 3 years of age, these settings do not have the same admissions catchments as traditional pre-schools.
- 1.1.17 The Early years sector is market driven given that most of the early years sector is not subsidised by Government.
- 1.1.18 In 2018 an application on the site for the erection of a building to accommodate a children's nursery was approved (16/04891/FUL). While the exact reasons are not known, the scheme has not been subsequently developed suggesting that market demand or viability issues may be present.
- 1.1.19 The Early years sector is market driven given that most of the early years sector is not subsidised by Government.
- 1.1.20 In 2018 an application on the site for the erection of a building to accommodate a children's nursery was approved (16/04891/FUL). The early years facility was for 26 places and if funding is available increase to a 52-place pre-school. While the exact reasons are not known, the scheme has not been subsequently developed suggesting that market demand or viability issues may be present.
- 1.1.21 In addition, it is not apparent whether this requirement has been viability tested.

1.1.22 Gladman do not consider the provision of an early years facility on land parcel 3 of SSV22 to be justified by thorough and robust evidence.