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# Bath & North East Somerset Placemaking Plan: Further Statement

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On behalf of the Society of Merchant Venturers,  
Uplands Farm, Keynsham

Participant 114 – Savills, for the Society of Merchant Venturers

**Hearing Session 27<sup>th</sup> September 2016 – Matter 16, Issue 1**

11<sup>th</sup> August 2016

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**Appendix A - Representations Submitted on behalf of the Society of Merchant Venturers 1<sup>st</sup> February 2016**

### 1. Introduction

1.1 This further statement on Matter 16, Issue 1 should be read in conjunction with the letter, representations and addendums previously submitted on the 1<sup>st</sup> of February 2016. A copy is attached as Appendix A. The representations made are not repeated here, but in summary are:-

- The Submission Plan does not accommodate the housing requirements in the area
- The Submission Plan has wrongly rejected Uplands Farm as a deliverable option.

1.2 We have noted the further material have been submitted by the Council in advance of the Hearings. Following an examination of these, we have set out our further representations which address matters which relate to our previous representations and require our further comment. This document refers to the issue of housing numbers and the questions raised in that respect.

1.3 Should further material be made available during the course of the Examination, we reserve the right to comment in response.

## 2. Overall Housing Numbers

### 2.1 Q1. Are sufficient housing allocations made to achieve the housing requirement for Keynsham?

2.2 There are few clues within the Submission documents to the Examination as to why it is considered appropriate to continue to reject the inclusion of Uplands Farm as a source of additional housing when it is clear that the proposed allocations of 1,701 dwellings does not match the requirement for a minimum of 2,150 new homes.

2.3 The clearest statement from the Council lies within the submitted *Consultation Statement Regulation 22(1) (c) of April 2016* which combined a number of the representations made and sites proposed and then provided a general commentary. The Council stated:

*“The housing land supply based on the most recent progress in bringing forward sites has been reviewed. It is concluded that there is risk to delivery of some of the sites which are relied upon to deliver the 13,000 core strategy housing requirement, but this is offset by other sites forthcoming. It is not considered that the risk is so great as to warrant the identification of new housing sites at this stage and that the appropriate time to review is as set out in the Core Strategy i.e. a 5 year review in 2019/20 to ascertain whether the 13,000 is still the appropriate housing target and whether any changes in the spatial strategy are required to ensure its delivery.”*

2.4 Local Plans are expected to have “sufficient flexibility to adapt to rapid change” (NPPG Para 14) and the LPA are fortunate in this case that it has the Placemaking Plan in play that can be used to adapt to the changing requirement and risk environment in the absence of its forthcoming replacement DPD. However, the risk referred to by the Council in its consultation response is not identified, quantified nor mitigation considered in any published evidence document that we are aware of. Therefore it is not clear on what basis the Council can remain confident that there is no requirement to identify sufficient housing land to provide the flexibility required.

2.5 Moreover, in the case of Keynsham and as set out in our previous representations, there is a need to ensure that the delivery of housing in an area where there is a need to significantly boost the supply of housing is not overlooked by such a generic and inadequate response.

2.6 It is our view that the Council, in the interests of justifying the soundness of the Plan, should prepare further evidence to support the view that the allocations provided will be sufficiently robust to provide the required housing over the period of the Plan or otherwise consider the allocation of reserve sites to provide that flexibility.



### Appendix A - Representations Submitted on behalf of the Society of Merchant Venturers 1<sup>st</sup> February 2016 (reproduced from on-line form)

Representations on behalf of the Society of Merchant Venturers

#### Agent Details

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#### Q1a To which volume of the Placemaking Plan does your representations relate?

Volume 1 – District Wide

Volume 2 - Bath

Volume 3 – Keynsham ✓

Volume 4 – Somer Valley

Volume 5 – Rural Areas

Volume 6 – Appendices

#### Q1b To which part of the Placemaking Plan does you representations relate?

Policy ✓

Paragraph

Table

Diagram

#### Q1c Please specify which Policy, Paragraph, Table or Diagram you are referring to:

Policy KE1

**Q2a Do you consider the document is legally compliant?**

Yes ✓

No

**Q2b Do you consider the document is sound?**

Yes

Yes, with minor changes

No ✓

**Q3 If you consider the Draft Placemaking Plan is unsound, is it because it is not:**

Positively Prepared ✓

Justified ✓

Effective ✓

Consistent with National Policy ✓

**Q4 Please give details of why you consider the Draft Placemaking Plan is not legally compliant or sound**

Policy KE1 (b) does not identify sufficient sites to ensure the delivery of the housing strategy in Keynsham (i.e. a minimum of 2150 new homes) over the plan period or to “*boost significantly the supply of housing*” (in accordance with paragraph 47 of the NPPF).

The allocated sites in the Local Plan (i.e. K2) and those in the Core Strategy (i.e. KE2, KE3a, KE4) provide for approximately 1,701 dwellings. Indeed, it is noted (from paragraphs 37 – 42) that at this stage only 1,251 dwellings

currently have planning permission - with only around 123 new homes delivered. Further, the delivery of windfall sites from 2011 does not 'make up' the significant shortfall.

As such, the LPA cannot rely upon the existing allocations/permissions or windfall sites to boost significantly the supply of housing in Keynsham and without identifying further sites it is considered that the Plan is unsound.

### **Q5 Please set out what change(s) you consider necessary to make the Draft Placemaking Plan legally compliant or sound**

Policy KE1 (b) should identify additional key sites to boost significantly the supply of housing in Keynsham.

It is considered that simply allocating the 'safeguarded land' to the east of Keynsham (for approximately 200 dwellings) is insufficient to boost significantly the supply of housing at Keynsham. To this end, we consider that our client's land should now also be considered for allocation in the Placemaking Plan. Indeed, in the Land at Uplands Development Concept Options Report (Arup, 2013) it notes, at page 16, that developing the East Keynsham site in tandem with the land to the south of Keynsham at Uplands Farm would be a "good opportunity" to create a more comprehensive and sustainable solution.

We (nee Smiths Gore) submitted representations to the 'Options' Placemaking Plan in January 2015 setting out the suitability of the site for development. This included a Indicative Concept Plan for potential development of land at Uplands – comprising some 250 dwellings together with a neighbourhood centre providing local services and facilities for the development and which could serve a wider, area improving sustainability locally. We have attached these representations for reference.

In summary, it is considered that the Council has wrongly rejected our client's land as a potential development site to deliver housing for Keynsham. Indeed, development of the land to the south of Keynsham at Uplands Farm is a deliverable option (either on its own or in tandem with East Keynsham) for the following reasons:

- Keynsham is capable of accommodating significant growth given the range of services it currently offers, being a market town and service centre for the surrounding area. Keynsham also occupies a strategically important location between Bristol and Bath, and is therefore a sustainable location for development.
- Residential development in this location would be in keeping with the surrounding area. The site would adjoin the existing built up area and is considered an appropriate extension to Keynsham. In addition, the land is well contained and development on this site would have a limited impact on the wider landscape.
- Whilst the site and surrounding area lies within the Green Belt, it does not meet the five purposes of including land within the Green Belt. Indeed, in the Council's Green Belt Review Stage 1 (April 2013) it comments that "*the Green Belt directly to the south of Keynsham is not of importance for preventing the merger of Bristol and Keynsham*" – therefore the rolling back of the Green Belt in this area is acceptable.

- Whilst the site is in close proximity to the town centre - there is an opportunity to improve walking linkages to the town centre via new pedestrian footways along Wellsway with potential for a link to Hardington Drive. In addition, the town centre is only 15-20 minutes by bicycle.
- The site has access to local employment opportunities within Keynsham at the industrial estate to the north and by public transport provision to the town centre.
- Easy access to bus services along the B3116 Wellsway, including the No 178 service which could serve further development to the south at Uplands. In addition, the train station is only approximately 1.5 miles from the site with train services to Bath and Bristol (and beyond) for access to employment etc.
- The scale of dwellings proposed is capable of delivering housing in line with local objectives, such as need for affordable housing, and improvements to infrastructure and services.
- There is scope at the Uplands site to include local services and facilities as part of a development proposal. These could serve a wider area supporting the sustainability and access to services and facilities for the southern residential estates of Keynsham.
- The allocation of development at Uplands in tandem with East Keynsham could also offer the opportunity for a primary school site – from a sustainability perspective if a new primary school is required then a site to the south of Keynsham would be preferable in terms of spreading accessibility, rather than concentrating primary education to the north of Keynsham where Chandag Primary and Infant schools already exist close to the East of Keynsham allocation.
- The site is in Flood Zone 1. Further, there are no other environmental or physical constraints to the site which cannot be mitigated for (i.e. the gas pipeline).
- Further opportunity to deliver new areas of green infrastructure, such as public open space.
- The site is within the sole control of the SMV which will facilitate its timely development. In addition, the Land at Uplands Development Concept Options Report (Arup, 2013) confirms that a viable housing scheme could be delivered on the site.

The above demonstrates that the site is suitable, available and achievable for residential development. Moreover there are no significant constraints which will prevent development on the site.

### Supplementary Info

Uploaded previous representations to the Options consultation and the Uplands Concept Plan.

## Issue 1: Housing in Keynsham – The Requirement

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**Q6 If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?**

No

Yes ✓

**Q7 If you wish to participate, please outline why you consider this to be necessary.**

The suitability of the Plan (as currently set out) to boost significantly the supply of housing at Keynsham will require exposition at the Examination Hearings.