# B&NES Placemaking Plan Examination: Hearing Statement Matter 16: Housing in Keynsham

By Barton Willmore
On behalf of Taylor Wimpey

Representor no. 7138 Land near Minsmere Road and Manor Road

August 2016



#### **B&NES Placemaking Plan Examination:**

#### **Hearing Statement Matter 16: Housing in Keynsham**

## By Barton Willmore On behalf of Taylor Wimpey Representor no. 7138

Project Ref:	21412/A3/FW/jmm	
Status:		
Issue/Rev:	P1	
Date:	14 <sup>th</sup> August 2016	
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Date: August 2016

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Issue 1: Whether the policies contained in the Placemaking Plan would meet the housing requirement for Keynsham of 2,150 new dwellings (net)?

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?

#### 1.0 INTRODUCTION

1.0 This Hearing Statement is submitted on behalf of Taylor Wimpey UK Limited in relation to Land at East Keynsham. As shown on the site plan at Appendix 1, Taylor Wimpey controls land at east Keynsham, lying to the east of Minsmere Road, which was removed from the Green Belt and is safeguarded in the Core Strategy. Taylor Wimpey is also in advanced negotiations with the vendor of the site to the south (accessed from Manor Road) which remains within the Green Belt and is shown edged in orange as 'future Taylor Wimpey land for removal from the Green Belt' on the site location plan at Appendix 1.

#### 2.0 POLICY CONTEXT

- 2.1 National planning policy on five year housing land supply is contained in PPG and the NPPF (2012). Paragraph 29 of PPG states that in order to assess a sites suitability, availability and achievability will provide the information as to whether a site can be considered deliverable.
- 2.2 'Deliverability' is defined in footnote 11 of the NPPF as being available now, offering a suitable location for development now and be achievable with a realistic prospect that housing will be delivered within five years, and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is evidence that the site cannot be implemented in the next 5 years, for example if they are not viable, have long term phasing plans or there is a lack of demand for the type of units.
- 2.3 According to PPG, deliverable sites for housing could include those that are allocated for housing in the development plan and sites with planning permission (outline or full that have not been implemented) unless there is clear evidence that schemes will not be implemented within five years. Local planning authorities will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgements on deliverability are clearly and transparently set out.
- 2.4 B&NES is required to apply a 20% buffer to its five year housing land supply, due to a history of under supply. PPG states that local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the Duty to Cooperate.

#### 3.0 FIVE YEAR HOUSING LAND SUPPLY POSITION

- 3.1 In order to fully understand whether B&NES is planning for the appropriate number of homes and allocating a sufficient number of sites, it is important to understand the five year housing land position.
- 3.2 B&NES considers it has a supply of 5,438 homes (2016/17 2020/21) resulting in 5.4 years supply. The 'Sedgefield' approach is applied to the five year land supply calculation to that any shortfall in delivery that is evident at the start of the five year period is made good by the end of that period, rather than over the remainder of the entire plan period. A 20% buffer is applied on account of past persistent under delivery.
- 3.3 We do not, however, consider that the authority's position on its five-year housing land supply is correct.

#### 4.0 BARTON WILLMORE FIVE YEAR HOUSING LAND REVIEW

- 4.1 We have carried out a review on B&NES Housing Land Supply Findings Report and Trajectory (April 2016), and investigated a sample of 18 sites, 11 of which are disputed. The methodology and findings are included at Appendix 2 and 3.
- 4.2 The full assessment of the 11 disputed sites in the Housing Land Supply Findings Report and trajectory 2016 sites is appended (Appendix 2 and 3) and we provide a summary of some key points below:
  - There are sites included which have an allocation but no planning permission.
     These need to be approached with caution, and as discussed above it is unrealistic that any homes will be delivered on these sites within the next three years;
  - Several of the sites included have outline planning permission, and will therefore still need approval of reserved matters and conditions, which can take several months or years;
  - Some of the sites do not have a formal planning permission, only a resolution to grant permission, and a Section 106 agreement still needs to be signed. This process can take a long time, which will then need to be followed by the approval of conditions and reserved matters if an outline application before work commence on site, and this process can be lengthy; and
  - There are inconsistencies between the Housing Land Supply Findings Report (April 2016) and the Housing Trajectory which is appended to said report. For example the Fire Station is included in the trajectory as having the potential to deliver 90 homes over the next five years, but the Housing Land Supply Findings Report states that a prior approval application (LPA ref: 15/04723/ODCOU), was submitted in August 2015 for change of use from B1a (office) to 110 residential units but was subsequently withdrawn due to highways objection. It is therefore unclear why this site is still included in B&NES housing trajectory as a deliverable site.
- 4.3 Of further note is that a number of the sites assessed in the Edward Ware appeal have now been removed from B&NES Housing Land Supply Trajectory (April 2016), as they are now being pursued for student accommodation. As acknowledged in the 'Submission of the Bath & North East Somerset Placemaking Plan for public examination' report to Council on 23<sup>rd</sup> March 2016, a key issue in relation to housing delivery in the

authority relates to student accommodation being provided in place of open market housing. B&NES needs to fully consider what impact the amount of student accommodation has had on their housing delivery and plan for this appropriately in their housing numbers.

- 4.4 Through our assessment of the 11 disputed sites, our total figure for these sites is 1,090 homes less than B&NES' five year projection for these sites. As such, we have deducted this figure from B&NES total five year supply figure of 5,438 homes, and our assessment therefore finds that B&NES has at most a five year housing land supply of 4,348 homes, equating to no more than 4.3 years. It should be noted that the 11 sites only present a sample, and if we looked at all of the sites the figure may be even lower. Our calculations and outputs are summarised below:
  - a) B&NES Housing land supply assessment is:
    - The council says it has a deliverable supply of land for 5,438 homes (2016/17 2020/21)
    - This equates to **5.4 years** of supply (5,438 homes supply / 1,007 homes needed a year = 5.4 years)
  - b) Barton Willmore Housing land supply assessment:
    - We say the council has a deliverable supply of land for no more than 4,348
       homes (2016/17 2020/21)
    - This equates to no more than **4.3 years** of supply (4,348 homes supply / 1,007 homes needed a year = 4.3 years)
- 4.5 Due to the five year housing land supply shortfall and historic under provision of housing in B&NES, it is unlikely that the Core Strategy housing requirement will be met if further allocations are not made.

#### 5.0 HOUSING SUPPLY POSITION IN KEYNSHAM

- 5.1 B&NES Housing Land Supply Trajectory April 2016 states that the five year housing land supply for Keynsham 2016 2021 is 2,085 homes. However, our assessment of the 11 disputed sites in the trajectory (included at Appendix 3) suggests that there are some issues with the projected figures included for three of the Keynsham sites.
- 5.2 Our assessment of some of the sites in Kenysham and their planning status results in a five year housing land supply figure of 331 homes less than B&NES 2016 projections. The Fire Station appears in the trajectory despite the prior approval application having been withdrawn; Mactaggart and Mickel's site at east Keynsham does not benefit from a planning permission, and the projections for South West Keynsham do not reflect historic completion rates over the last five years at the site.
- 5.3 Additional allocations should be made across the authority, and we consider that Keynsham is an appropriate and sustainable place to allocate housing. Keynsham is identified in the Core Strategy and Joint Spatial Plan as an appropriate location to accommodate new homes, jobs and sustainable growth. If the Placemaking Plan is to deliver this vision, further allocations must be made in Keynsham.
- 5.4 As part of a development industry consortium, Taylor Wimpey submitted representations to the Joint Spatial Plan Issues and Options consultation identifying that the West of England Strategic Housing Market Assessment (WoE SHMA) underestimates the need for new homes raising significant issues about the definition of the housing market area within the WoE SHMA, and the exclusion of B&NES from the Wider Bristol HMA.
- On the basis of the above, B&NES should be allocating further sites for residential development in Keynsham, particularly given the current demand for housing in Keynsham, and to deliver the ambitious objectives for Keynsham as set out in the Placemaking Plan.

#### 6.0 ALLOCATING LAND AT EAST KEYNSHAM

- 6.1 Taylor Wimpey's land comprises two adjoining fields:
  - 1. A northern field lying adjacent to Minsmere Road and immediately to the south of the east Keynsham strategic site allocation (allocated under the Bath and North East Somerset Core Strategy). This field was removed from the Green Belt and safeguarded for future residential development in the B&NES Core Strategy under Policy KE3B. It is located between the existing urban edge at Minsmere Road and the Manor Road Community Wood to the east. The topography of the land is reasonably flat with a gentle incline from north to south. This site is owned by Taylor Wimpey and can accommodate approximately 80 dwellings.
  - 2. A southern field, to the north of Manor Road, which currently remains within the Green Belt. The site is currently the subject of an agreement in principle between Taylor Wimpey and the vendors.
- 6.2 As noted above, much of the land at East Keynsham has already been removed from the Green Belt and safeguarded for future development needs. The only further Green Belt release needed would be of the southern field (north of Manor Road).
- 6.3 It should be noted that, the safeguarded site can be brought forward without the southern parcel which is still within the Green Belt, but this land could be considered for future development, and should be assessed by B&NES as part of a Green Belt review. The parcels could be delivered on their own because they can be accessed independently from Manor Road and Minsmere Road.
- 6.4 To the north of the Taylor Wimpey land is a further area of land (adjoining the allocated strategic site) which was removed from the Green Belt and safeguarded for future development by the B&NES Core Strategy.
- 6.5 In total there is approximately 15ha of developable land at east Keynsham, just under 7ha of which are within Taylor Wimpey's ownership. On reasonable density assumptions, this land at east Keynsham could deliver around 400 new homes, together with the wider East Keynsham area.
- 6.6 Taylor Wimpey's site at East Keynsham is an obvious solution to the need for further allocations to release this safeguarded site and to do this now to avoid further delay with the adoption of the local plan. The JSP is likely to require B&NES to absorb some

of the regional housing requirement, and the local plan should be planning for this now. Given the removal of the site from the Green Belt we consider that the allocation of East Keynsham site for housing is now on a matter of timing; and given BaNES' lack of a five-year supply of housing land — BaNES should allocated the site now in order to ensure the Plan is sound.

6.7 Land east of Keynsham lies to the south of the A4 major public transport corridor. A new primary school is planned within the east Keynsham strategic site, which is currently at the pre-application stage. Wellsway secondary school is a short walk to the north-west. Ample public open space is available in close proximity in Manor Road Community Woodland and further formal open space is planned within the strategic site. Keynsham town centre and railway station are approximately 20 minutes' walk away. There are a number of employment sites within walking and cycling distance.

#### Suitability

- 6.8 The suitability of the safeguarded land was assessed in detail as part of the evidence base for the B&NES Core Strategy. This included (B&NES examination document reference numbers in brackets):
  - East Keynsham Development Concept Options Report (CD9/CO2);
  - Core Strategy Additional Evidence Heritage Asset Study (CS9/LV/1);
  - Keynsham East Landscape and Visual Impact Assessment (CD9/LV/7);
  - Transport Evaluation Report (CD9/I2/1);
  - Preliminary Arboricultural Assessment East Keynsham (CD10/E6);
  - Sustainability Appraisal Annex L Locational Alternative Appraisal Matrices (CS9/A1/5);
  - Sustainability Appraisal Matrices (Annex O) (CD10/A1/3).
- 6.9 The southern parcel of land (accessed from Manor Road), which is proposed as an additional Green Belt release, is suitable for development for the following reasons:
  - Its removal from the Green Belt would allow the continuation south of the Green Belt edge defined by Manor Road Community Wood, creating a Green Belt boundary which is defensible in the long-term and capable of enduring. The permanence of this boundary would be reinforced by the designation of Manor Road Community Wood as Local Green Space, which is proposed within the B&NES Placemaking Plan. In accordance with paragraph 85 of the NPPF, this would allow the LPA to "define

[Green Belt] boundaries clearly, using physical features that are readily recognisable and likely to be permanent". The Inspector's report on the B&NES Core Strategy stated (at para 207), in respect of the safeguarded land, that it "is well defined to the east by the Community Woodland". This comment is equally applicable to describe the southern parcel.

- The Core Strategy Additional Heritage Asset Study (LUC, September 2013) identified the site's development as being of low risk to the significance of heritage asserts.
- The land is within Flood Zone 1 (low probability) so there is no flood constraint to residential development.
- Removal of the site from the Green Belt would allow a southern access to be created from Manor Road. This could potentially facilitate creation of a walking and cycling route between Manor Road and the A4.
- The East Keynsham Development Concept Options Report (ARUP March 2013) recognises opportunities for development, including of this southern land parcel, to repair the existing unattractive urban edge of Keynsham.
- The Keynsham East Landscape and Visual Impact Assessment (B&NES, August 2013) assessed the land as having medium to low landscape character value and assessed the visual value of the land as low. The LVIA expressed concerns about risks of vandalism in the adjacent woodland if the land were to be developed, but it is considered that the greater natural surveillance that development of the land would provide would actually decrease incidence of anti-social behaviour in the woodland. Furthermore, its relationship to the woodland would be little different to that of allocated and safeguarded land parcels to the north.
- Land at east Keynsham is Grade 3b (moderate quality) agricultural land. It is therefore not the best and most versatile agricultural land. Agricultural land quality is not a constraint to its development.
- 6.10 Overall, the southern parcel of land represents a logical extension to the safeguarded land, allowing a consistent and permanent Green Belt boundary to be created defined by the community woodland, softening the urban edge of Keynsham and improving permeability.

6.11 For these reasons, the southern parcel, alongside the land already safeguarded for residential development, is an obvious location for new strategic growth.

#### **Advantages**

- 6.12 We set out below the key advantages of the site at east Keynsham.
  - The Placemaking Plan includes an aim to reposition Keynsham as a more significant business location enabling it to attract new employers to compensate for the closure of Cadbury Somerdale. In addition, the West of England SHMA defines Keynsham and surrounding parts of B&NES as being within the West of England housing market area. While we disagree with the definition of the housing market area, it is clear that this part of B&NES needs to contribute to meeting the needs of Bristol. In meeting those needs, East Keynsham, where much of the land is already removed from the Green Belt and safeguarded for future development needs, is an obvious location.
  - East Keynsham benefits from access to a range of healthcare facilities and public open space.
  - As identified in the Placemaking Plan and the JSP Sustainability Appraisal, Keynsham's location between Bath and Bristol gives it good access to local employment sites
  - Transport and infrastructure: The Inspector examining the B&NES Core Strategy (para 203) commented on east Keynsham as follows: it "is well located to make journeys by walking, cycling and bus particularly attractive". Keynsham railway station also provides quick access to Bristol, Bath and beyond.
  - Taylor Wimpey's land at east Keynsham provides an opportunity to create pedestrian and cyclist permeability south from the east Keynsham site allocation, connecting to Manor Road.
  - Environment: Development at east Keynsham is not constrained by heritage, ecological designations, landscape capacity or flood risk.

- Most of the land at east Keynsham has already been removed from the Green Belt.
   As described above, removal of the additional southern field would create a new, long-term defensible Green Belt boundary.
- 6.13 The site could create an improved urban edge which would soften the existing relatively harsh urban edge of Keynsham.

#### The Need for a Green Belt Review

- 6.14 To address the scale of housing need in a sustainable way, we consider that there are exceptional circumstances justifying a review of and alteration to Green Belt boundaries. The NPPF (paragraph 83) advises that when Green Belt boundaries are reviewed they should be considered having regard to their intended permanence in the long term.
- 6.15 In our view the Placemaking Plan presents an opportunity to review and alter Green Belt boundaries on a strategic and long-term basis. Such a review should be comprehensive and should include the identification of small releases to establish permanent Green Belt boundaries.

#### 7.0 CONCLUSION

- 7.1 East Keynsham is, as identified within the B&NES Core Strategy, a sustainable location for residential development. Much of the land has already been removed from the Green Belt and is safeguarded for future development needs. We have identified in this statement how additional land to the south could be removed from the Green Belt to create a more comprehensive, larger-scale development and long-term Green Belt boundary.
- 7.2 On the basis of the above, Land at East Keynsham should be identified within the Placemaking Plan for residential development.

### APPENDIX 1 SITE LOCATION PLAN

### APPENDIX 2 BARTON WILLMORE ASSESSMENT OF B&NES 5 YEAR HOUSING LAND SUPPLY

#### BARTON WILLMORE ASSESSMENT OF B&NES 5 YEAR HOUSING LAND SUPPLY

The five year requirement for a Council is calculated by first multiplying the annual average housing requirement as set out in the local plan. We set out below our methodology and calculation of B&NES five year housing land supply requirement step by step below:

- The B&NES Core Strategy housing requirement for the plan period is 13,000 homes and the plan period runs for 18 years. Therefore, on average the council needs to deliver 722 homes per year (13,000 / 18 = 722 homes).
- The "basic" five-year housing requirement is 3,610 homes (722 homes x 5 years = 3,610 homes). However, the council failed to deliver the average annualise requirement (722 homes) over the first 5 years of the plan period (2011/12 2015-16), only constructing 3,026 homes.
- The shortfall over last 5 year is therefore 584 homes (3610-3026).
- Add in the 584 homes shortfall to the next five-year supply means a five-year requirement of 4,194 homes (shortfall of 584 + basic requirement of 3,610 = 4,194 homes).
- Apply the NPPF 20% buffer results in a final five-year requirement of 5,033 homes (4,194 x 1.2 = 5,033 homes), or 1,007 homes a year over the next 5 years (5,033 / 5 = 1,007 homes)

On this basis the five year housing land supply requirement is 5,033 homes.

In addition to the assessment of the total five year housing land supply requirement set out above, we have carried a further review of the sites included in B&NES five year housing land supply trajectory to identify the five year housing land supply position.

As part of this review we have examined the sites included in the December 2014 and April 2016 Housing Land Supply Findings Report and housing trajectories appended to these reports as well as the evidence submitted with the Edward Ware Homes Appeals (APP/FO114/A/14/2217216; APP/FO114/A/14/2215930 and APP/FO11114/A/2214596).

The Edward Ware appeals identified 18 disputed sites contained in B&NES five year housing land supply, based on an analysis of the sites contained in the December 2014 Five Year Housing Land Supply Trajectory dated December 2014. Since that time B&NES has published an updated Housing Land Supply Findings Report and accompanying trajectory dated April 2016. We have therefore carried out an analysis of the 18 disputed sites, based on the more recent figures from the April 2016 evidence. Our assessment identifies 11 sites where the projected completion rates are called into question.

The table at Appendix 3 includes the five year housing land supply figure for the period 2016 – 2021 included in the April 2016 trajectory as well as that included in the 2014 trajectory. The table then includes our assumption of what we consider each site will deliver over the next five years and commentary to justify this in the final column. Our assumption is based on our experience of site delivery, and the following key principles:

- a) Historic under delivery in B&NES;
- b) If the site does not already benefit from planning permission it is very unlikely that any homes will be built over the next five years;

In identifying the likely delivery rate for each of the 11 sites, we have applied the timeline of events involved in the preparation of residential planning applications for large sites, based on our experience as planning consultants, as set out below.

Task	Approximate timescale
Prepare and submit a planning application and undertake technical, ecological and transport surveys	6 – 12 months
Determination of the application.	6 months
The EIA determination period is 16 weeks. This determination period is often extended to allow for resourcing at local authorities; and the logistics of applications being heard at subsequent planning committees.	
Signing of the Section 106 Agreement and issue of planning permission. It can be a long and complex process for the applicant and the authority to negotiate and agree the Section 106 package.	6 months
Preparation of reserved matters details if an outline application.	6 - 12 months
Preparation of pre-commencement conditions.	
Many strategic sites are subject to pre reserved matters planning conditions and other strategies requiring separate approval by the LPA prior to the submission of reserved matters.	
This process can often take longer than expected particularly if more detailed site investigations identify further site specific issues which require amendments to the plans, such as site levels, engineering, or protected species.	
Approval of reserved matters details and approval of conditions details.	2 – 8 months
As explained above, this can take longer than expected, as the information submitted can be very detailed and comprehensive, such as phasing plans and design codes.	
Implementation of pre-commencement conditions, such as the implementation of access points into the site or landscape management plans	2 – 4 months
Ground clearance	2 months
Total	3 - 4 years

As set out in the table above, it can take between three and four years for a strategic site to come forward for residential development. As such, in our assessment of the 12 sites in Appendix 3, if a site does not have planning permission we have assumed that no development will come forward in the first three years.

The full assessment of the 11 disputed sites in the Housing Land Supply Findings Report and trajectory 2016 sites is appended and we provide a summary of some key points below:

- There are sites included which have an allocation but no planning permission. These need to be approached with caution, and as discussed above it is unrealistic that any homes will be delivered on these sites within the next three years;
- Several of the sites included have outline planning permission, and will therefore still need approval of reserved matters and conditions, which can take several months or years;

- Some of the sites do not have a formal planning permission, only a resolution to grant permission, and a Section 106 agreement still needs to be signed. This process can take a long time, which will then need to be followed by the approval of conditions and reserved matters if an outline application before work commence on site, and this process can be lengthy; and
- There are inconsistencies between the Housing Land Supply Findings Report (April 2016) and the Housing Trajectory which is appended to said report. For example the Fire Station is included in the trajectory as having the potential to deliver 90 homes over the next five years, but the Housing Land Supply Findings Report states that a prior approval application (LPA ref: 15/04723/ODCOU), was submitted in August 2015 for change of use from B1a (office) to 110 residential units but was subsequently withdrawn due to highways objection. It is therefore unclear why this site is still included in B&NES housing trajectory as a deliverable site.

Of further note is that a number of the sites assessed in the in Edward Ware appeal have now been removed from B&NES Housing Land Supply Trajectory (April 2016) as they are now being pursued for student accommodation. As acknowledged in the 'Submission of the Bath & North East Somerset Placemaking Plan for public examination' report to Council on 23<sup>rd</sup> March 2016, a key issue in relation to housing delivery in the authority relates to student accommodation being provided in place of open market housing. B&NES needs to fully consider what impact the amount of student accommodation has had on their housing delivery and plan for this appropriately in their housing numbers.

Through our assessment of the 11 disputed sites, our total figure for these sites is 1,090 homes less than B&NES five year projection for these sites. As such, we have deducted this figure from B&FNES total five year supply figure of 5,438 homes, and our assessment therefore finds that B&NES has a five year housing land supply of 4,348 homes, equating to 4.3 years. Our calculations and outputs are summarised below:

- a) B&NES Housing land supply assessment is:
- The council says it has a deliverable supply of land for 5,438 homes (2016/17 -2020/21)
- This equates to 5.4 years of supply (5,438 homes supply / 1,007 homes needed a year = 5.4 years)
- b) Barton Willmore Housing land supply assessment:
- We say the council has a deliverable supply of land for 4,348 homes (2016/17 -2020/21)
- This equates to 4.3 years of supply (4,348 homes supply / 1,007 homes needed a year = 4.3 years)

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Due to the five year housing land supply shortfall and historic under provision of housing in B&NES, it is unlikely that the Core Strategy housing requirement will be met if further allocations are not made.

# APPENDIX 3 BARTON WILLMORE FIVE YEAR HOUSING LAND SUPPLY REVIEW TABLE

B&NES EXAMINATION STATEMENT Appendices

#### **BANES 5YHLS REVIEW**

Site	2014 5yhls for 2016 – 2021 (BANES Housing Trajectory 2011- 2029, dated Dec 2014)	5yhls figure for 2016 - 2021 (BANES Housing Trajectory 2011-2029, dated April 2016)	Our figure	Comments
Bath				
MOD Warminster Road	175	175	75	Full permission (14/02272/EFUL) granted 03/03/2015 for 204 homes. No evidence that conditions are being discharged, although BANES state that the owners, Firestone, have commenced site clearance. Unlikely that any homes will be built in the next two years, but maybe 25 per year could be achieved 2018/2019 and 2020/2021
Rear of 89-123 Englishcombe Lane	20	40	0	The land has been allocated for the development of 40 dwellings since the adoption of the BANES Local Plan (2007).  Council owned land which has not come forward due to the recession and a ransom strip. Council is currently agreeing terms to sell the site to Redcliffe.  Given that a planning application hasn't even be prepared, very unlikely that any houses will be built in the next 5 years.
Roseberry Place	150	175	25	Outline application submitted 28/04/15 for 200 flats (15/01932/EOUT) received positive recommendation at committee in November 2015. Section 106 yet to be signed, after which reserved matters and conditions will need to be approved.  Unlikely 175 homes will be built in next 5 years when Section 106 yet to be signed and conditions discharged.

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Bath Press	200	244	50	Application submitted (15/02162/EFUL) for 244 homes, which has received a recommendation for approval by officers and at committee but awaiting signed Section 106 with Meyer Homes.  Unlikely 244 homes will be built in next 5 years when Section 106 yet to be signed and conditions discharged.
Land at Odd Down	240	100	0	Allocated for 300 dwellings in the Core Strategy. Bloor Homes expected to submit an application in mid/late 2016
Keynsham				
Fire Station and Riverside, Keynsham	90	48	0	Housing Land Supply Report (April 2016) states that prior approval application submitted in August 2015 for change of use from B1a to 110 residential units (15/04723/ODCOU), but withdrawn due to highways objection – so why is this site still in the trajectory?
East of Keynsham (M&M)	225	100	25	Allocated for 250 dwellings in the Core Strategy.  Planning application submitted 23/02/16 (LPA ref: 16/00850/OUT) for 250 dwellings.  Application not yet determined.  It is unrealistic to expect that 100 homes will be built in the next 5 years, as the outline application needs to be approved and Section 106, followed by reserved matters and then conditions.
South West Keynsham	579	381	173	2007 Local Plan allocation.  Western section granted planning permission for 285 dwellings (09/03351/FUL) and is being developed by Taylor Wimpey. 36 completions 2013/2014 and 62 in 2014/2015.

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				Eastern section (Bilbie Green) has planning permission for 267 dwellings (14/00049/FUL) and is being built out by Barratt and David Wilson Homes. 6 homes were built 2015/2016.  Current completion rate equates to 34 dwellings a year, multiplied by 5 years this is 173 homes.
Somer Valley				
Old Pit Yard, Clandown	53	44	25	Outline planning permission for 44 dwellings granted in October 2015 (14/02889/OUT)
				No evidence that reserved matters have been
				submitted or conditions are being discharged
Welton, Bibby and Baron	150	100	0	Draft Placemaking Plan proposes to allocate the site for 100 dwellings.
				No application submitted, but pre-application discussions undertaken.
St Peters Factory	70	81	25	2007 Local Plan allocation. Oval Estates submitted an application in October 2014 for 91 dwellings (14/04003/OUT) which was subsequently reduced to 81 dwellings and planning permission was granted 02/03/2016.
				No evidence that reserved matters have been submitted or any conditions have been discharged.
				Unlikely that any dwellings will be built in the next 3 years, but potential for some completions in the last 2 years.
Total		1,488 homes	394 homes	760.01

### APPENDIX 4 HOUSING SUPPLY POSITION IN KEYNSHAM

Site	2014 5yhls for 2016 – 2021 (B&NES Housing Trajectory 2011-2029, dated Dec 2014)	5yhls figure for 2016 - 2021 (B&NES Housing Trajectory 2011- 2029, dated April 2016)	Our figure	Comments
Fire Station and Riverside, Keynsham	90	48	0	Housing Land Supply Report (April 2016) states that prior approval application submitted in August 2015 for change of use from B1a to 110 residential units (15/04723/ODCOU), but withdrawn due to highways objection — so why is this site still in the trajectory?
East of Keynsham (M&M)	225	100	25	Allocated for 250 dwellings in the Core Strategy.  Planning application submitted 23/02/16 (LPA ref: 16/00850/OUT) for 250 dwellings.  Application not yet determined.  It is unrealistic to expect that 100 homes will be built in the next 5 years, as the outline application needs to be approved and Section 106, followed by reserved matters and then conditions.
South West Keynsham	579	381	173	Western section granted planning permission for 285 dwellings (09/03351/FUL) and is being developed by Taylor Wimpey. 36 completions 2013/2014 and 62 in 2014/2015.  Eastern section (Bilbie Green) has planning permission for 267 dwellings (14/00049/FUL) and is being built out by Barratt and

Site	2014 5yhls for 2016 – 2021 (B&NES Housing Trajectory 2011-2029, dated Dec 2014)	figure for 2016 - 2021 (B&NES Housing Trajectory	Our figure	Comments
				David Wilson Homes. 6 homes were built 2015/2016.  Current completion rate equates to 34 dwellings a year, multiplied by 5 years this is 173 homes.
Total		529 homes	198 homes	