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Written Statement: Matter3

Examination of the Bath and North East
Somerset Local Plan Partial Update

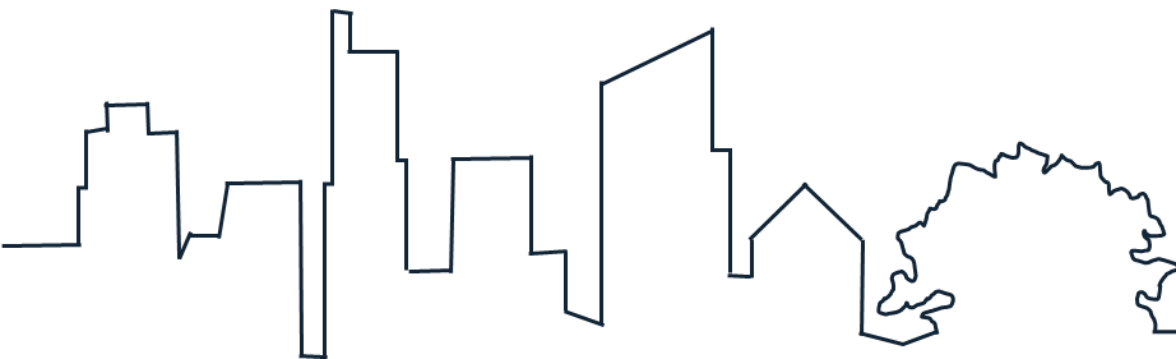
On behalf of Vistry Homes

06 JUNE 2022

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MATTER 3: HOUSING LAND SUPPLY

Issue: Do the policies of the Plan identify a sufficient supply and mix of sites for the plan period?

Q.14 The Council has confirmed in its letter of 7 March 2022 (B&NES 1) that the intention of the Plan is to provide a five-year supply of housing sites on adoption. What is the evidence that there would be a five-year supply of deliverable housing sites on adoption of the Plan as per the requirements of the NPPF?

Vistry Homes has commissioned Intelligent Land (IL) to carry out an independent review the Council's five year housing land supply, which can be found at Appendix I. Based on IL's findings the Council is unable to demonstrate a five year supply.

The Council's most recent assessment of housing supply sets out their position as of the 1st of April 2021 and is contained in the Housing Trajectory March 2021 Report (CD-HOU002). The Council have subsequently provided further data in response to the Inspectors initial questions (Exam 1b Appendix 11a and 11b). The data is lacking in detail and is inconsistent with the trajectory so is hard to assess. However, as set out in IL's report, we consider that the Council have been over optimistic in predicting its supply.

The Councils approach to housing land supply is further explained in the Topic Paper: Housing Requirement and Housing Supply (CD-SD026). There are a number of serious flaws to the Council's approach as set out in the Topic Paper:

- The Council does not have an up-to-date Strategic Plan, so the housing requirement should be based on the standard method not the Core Strategy requirement of 722dpa.
- New affordability ratios have been published which increases the local housing needs figure when compared to the figure of 676dpa quoted in the Topic Paper. As a result, the standard method now only shows a very small decrease in the Council's housing requirement (720 dpa) compared to the existing annual Local Plan requirement (722 dpa).
- When a 5% buffer is added to the annual local housing need requirement results in a figure of 756 dpa, or 3,780 dwellings for a five year period.
- The Council factors in oversupply in the earlier part of the plan period (2017 onwards) into the 5YHLS, noting that the Court judgement Tewkesbury Borough Council v Secretary of State for Housing Communities and Local Government and J J Gallagher

Limited and Richard Cook [2021] EWHC 2782 (Admin) rules that the decision on whether or not to do so will be a matter of planning judgement. We disagree with the Council's interpretation of where in the process that planning judgement should be made. In our view, the Court upheld the Inspectors decision to remove past oversupply from the 5YHLS calculation whilst considering the implications of the oversupply in the planning balance on a case-by-case basis. As such we consider that past oversupply should not be factored in when calculating 5YHLS.

- The Council's justification for factoring in past over supply set out in para 5.2 of the Topic Paper is also flawed for two main reasons. Firstly, it is no longer the case that the Core Strategy requirement will result in higher housing delivery than the standard method. Secondly, that the LPPU is intended to maintain housing delivering in planned manner whilst the SDS is being prepared, when work on the SDS has been halted for the foreseeable future.

Overall, as set out in Appendix I, IL conclude that for the period of 2021 to 2026 the supply is 4.38 years. The situation then deteriorates further from 2023, when the Council's predicted supply is 4.81 years, which is a deficit of 144 dwellings. IL consider the supply is 3.76 years. On the basis of IL's predictions, the Council is unable to demonstrate a five year supply, and will not be able to do so for the next two five year periods

Q.15 Do strategic policies include an up-to-date trajectory illustrating the expected rate of housing delivery over the plan period as per NPPF paragraph 74?

The Housing Trajectory March 2021 does not provide an up-to-date trajectory that is supported by the evidence required to justify the expected rate of housing delivery over the plan period. We note that in the Council's response to the Inspectors Initial Questions (Exam I) in relation to Question 13 the Council states that the information in Appendix I 1a and I 1b provides evidence for the sites in the housing trajectory. However, there is no justification for the housing delivery rates contained therein.

The Council go on to state that they will conduct the 2022 housing construction/completions monitoring surveys at the end of March 2022. These figures will then be collated into the updated housing trajectory for April 2022. However, this information has not been made available to date. We are concerned that should new evidence be presented before the hearing, participants will not have a fair opportunity to review and respond to it.

APPENDIX I

BaNES

Housing Land Supply Report

Prepared by
Intelligent Land

June 2022



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Report Presented by	Intelligent Land
Status	
Issue no.	02
Date Issued	June 2022
Lead Author	Richard Henshaw
Checked by	

1. Introduction

- 1.1 This report has been prepared to assess whether BaNES can demonstrate a five year housing supply in the context of the Local Plan Partial Update.

2. The Housing Requirement

Local Plan Requirement

- 2.1 As the Local Plan was more than five years as of July 2019, the housing requirement for the five year period 2021 – 2026 is based on the Standard Methodology.

The Standard Methodology

- 2.2 The Standard Methodology should be used for BaNES, as the local plan is more than five years old, resulting in a figure of 720 *dpa*. This is 44 *dpa* higher than identified in the Topic Paper (CD-SD026). Therefore, for the period 2021 – 2026, and subsequent five year periods, it equates to 3,600 dwellings, plus a 5% buffer, which totals 3,780 dwellings (756 *dpa*).

3. Housing Supply

Deliverability

- 3.1 The identification of a five years' housing supply starts by understanding the definition of '*deliverability*' in the NPPF. 'Clear evidence' must be something which is more than just being informed by landowners, agents or developers that sites will come forward.

Sales Rates

- 3.2 Intelligent Land regularly updates an assessment of sales and completion rates for sites being built by the 'national' house builders (Appendix 1). This predicts an average completions rate per sales outlet per annum of 52 dwellings, including private and affordable housing. Two developers on one site will also deliver around 52 dwellings per annum each. Three developers on one site do not maintain this rate and are more likely to deliver around 120 dwellings per annum.

Council's Supply

- 3.3 The Council's 2021 Housing Trajectory Report sets out the position as of the 1st of April 2021. This does not provide a reasonable examination of delivery, considering ownership, the number of sales outlets and phasing, alongside the planning status of the scheme.

3.4 The Council has presented a number of updated predictions within Exam 1B (Appendices to Bath and North East Somerset Council Response to Inspector’s Initial Questions Letter). The Council identifies the following housing supply categories, and an audit of these sites has been undertaken (Appendix 2).

- A. Committed large sites
- B. Committed small sites
- C. Small site windfalls
- D. Large site windfalls
- E. Student Accommodation

A. Committed Large Sites

Bath

3.5 This category in Bath remains the largest source of supply predicted by the Council.

Site 1 BWR OPA.1 'red & pink land'(St. William/Council)

3.6 This is part of the large Bath Waterside Regeneration site which is under construction. Delivery of the site is complex, as it involves over 2,200 dwellings, along with student accommodation and ancillary uses. The Council has updated information from its 2021 HLS report and increased delivery from 80 dpa to 188 dpa without explaining why there has been an increase. This is derived from the Council’s own Regeneration and Housing Services predictions, with no clear evidence provided for the change. This also maintains housing delivery will commence from 2024/25, despite a planning application having not been submitted. The Council confirms a public consultation on the project is underway, and this states an application will be submitted in Summer 2022, with an earliest start on site in the autumn of 2023. This does not identify if the application will provide detailed permissions necessary to commence development.

3.7 IL does not dispute that delivery will take place, but does not consider it will be undertaken as quickly as predicted by the Council. A public consultation is presently underway and the submission of an application this summer would therefore appear ambitious. An application on this scale could well take 9 months for determination, and a S.106 agreement will then need to be signed, which could take a further 6 months to a

year. If reserved matters are required a further minimum 6 months should be added to the timeframe, and if not, a similar time should be given to clear conditions.

Consequently, IL do not consider completions will be obtained from the site until 2026/27. Additionally, IL question the scale of predicted annual completions and consider the original figures in the Council's HLS report should be used.

Site 2 BWR OPA Car Showrooms 'green land' (Renrod, Ston)

- 3.8 Full permission for 43 dwellings was granted to Vistry Partnership in November 2021, and it is assumed these will be built within the next five years. The Council has not included these within the next five years, so they should be added to the supply.

Site 4 Bath Press (Aberdeen Asset Management/Collado Col)

- 3.9 Full permission for 244 dwellings was granted for this site on the 17th of February 2016 (15/02162/EFUL). It is unclear whether this application was implemented, but the applicant states it is extant, and submitted a full application for the development of 286 dwellings (20/04760/EFUL), on the basis the extant permission is unviable. This was refused in September 2021 for lack of employment space, parking, the loss of an historically important chimney and the lack of north-south connections. A resubmission has been made (20/04760/EFUL), which does not make reference to a specific number of dwellings in its description. However, the Planning Statement states there are to be 277 dwellings in the form of apartments and townhouses.
- 3.10 A review of the application website shows a recent objection to the proposal by the Transportation and Highways Officer, as the scheme shows a significant shortfall of off-street parking spaces.
- 3.11 The Council is predicting the scheme will deliver the first dwellings in 2023/24, but there is presently no certainty the latest application will be permitted. If permitted, the scheme involves demolition and site restoration, so will not be capable of delivering dwellings quickly. With this uncertainty, and the applicants claim the permitted scheme is unviable, there is no clear evidence to show development will take place as envisaged by the Council. As such, IL considers delivery should be delayed beyond the current five year period.

Site 9 R/O 89-123 Englishcombe Lane

- 3.12 This site is owned by the Council who gave themselves permission, subject to a S.106 agreement to build 37 dwellings in August 2020. However, the S.106 has not been signed so the application has not yet been determined. The intention was the land would be transferred to Aequus, but the Council has resolved to reconsider the scheme as a result of the ecological implications of development on the site. The Council has launched a consultation exercise as to what to do with the site. IL therefore conclude the site should not be considered deliverable until the Council has concluded how it wishes to progress and acquires a planning permission.

Site 23 Land at Odd Down Phase 2

- 3.13 This is part of a local plan allocation (B3a). Phase 1 has permission and is being taken forward, but there is no planning history associated with Phase 2. As such, IL consider it is appropriate to predict delivery will take place at the end of the Plan period, beyond the timeframe of this assessment.

Site 25 Plymouth House, Bath

- 3.14 This site has recently been put forward by the Council in Appendix 11a of Exam 1B response to Inspector's questions. The site has permitted development rights to convert to 22 flats, but the applicant Henry Boot Developments has been undertaking its refurbishment for offices <https://hbd.co.uk/scheme/plymouth-house/> so IL do not agree this should be included in the supply.

Site 26 4 – 5 Railway Close, Bath

- 3.15 This site has recently been put forward by the Council in Appendix 11a of Exam 1B response to Inspector's questions. The site has permitted development rights to convert to 21 flats, but the property is currently being advertised for office rent as part of a refurbished scheme https://www.rightmove.co.uk/properties/115011746#/?channel=COM_LET, so IL do not agree this should be included in the supply.

Keynsham

Site 33 East of Keynsham KE3a (Crest)

- 3.16 Planning permission for this site has only very recently been granted by Committee, subject to the signing of a S.106 agreement (4th May 2022). It is always difficult to estimate when a S.106 agreement will be signed, but it is assumed this will be within the next six months. The land does not appear to be owned by the prospective developer, so if a permission is granted acquisition will be required. Following this, the developer will need to secure reserved matters and deliver initial key infrastructure prior to the completion of dwellings. Consequently, IL consider that a conservative approach to delivery should be adopted, and completions should not be anticipated until the year 2024/25.

Somer Valley

Site 37 Welton Bibby & Barron, Welton, Midsomer Norton (MNR Real Estate)

- 3.17 A scheme for 84 dwellings was allowed on appeal in March 2018. This was for an outline permission with condition 2 requiring an application for reserved matters to be made no later than three years from the date of the permission. No reserved applications have been submitted, so the application has now lapsed. Consequently, IL does not consider the site will deliver dwellings within the timeframe of this assessment.

Site 39 Ryman Engineering services

- 3.18 The site was acquired in October 2020 by S R Catchers Ltd who are a food and beverages company. Although permission has been granted for 10 dwellings on the site, a more recent permission was granted in December 2020 for the construction of an industrial unit. It is therefore unclear whether the site will be brought forward for housing, or remain in industrial use. As such, IL does not consider it appropriate to include delivery of housing within the assessment period.

Site 43 Mirage Ink Ltd

- 3.19 Permission for 14 dwellings was granted for this site in March 2019, but has not been implemented. In March 2021, a new application for 4 dwellings was submitted and this is

pending a decision. It therefore appears the landowner wishes to build a scheme with a different mix of dwellings, and this should be reflected in the housing supply.

Rural

3.20 IL do not dispute delivery of the identified sites.

B Committed Small Sites

3.21 The Council has identified a total of 876 dwellings as committed on small sites. No information on these sites has been provided by the Council, but it is assumed these have planning permissions as of the 1st of April 2020. Without the information it is not possible to challenge the figures.

C Small Sites Windfalls

3.22 The Council identifies small site windfall completions of 322 for the two years beyond the current five year period. No justification for this delivery has been provided, but it is similar to the annual figure identified for committed small sites over the five years from April 2021. Without the Council providing the necessary data, IL do not consider the windfall allowance can be challenged.

D Large Site Windfalls

3.23 The Council no longer has projected dwelling completions from this source.

Summary

3.24 Tables 3 to 5 set out a comparison of the Council's and IL's predicted supply figures for the three five year periods starting from 2021 – 2026.

Supply source 2021 - 2026	Council	Intelligent Land
Committed large sites	3,258	2,510
Committed small sites	802	802
Small site windfalls	0	0
Large site windfalls	0	0
Totals	4,064	3,312

Table 3

Supply source 2022- 2027	Council	Intelligent Land
Committed large sites	2,977	2,199
Committed small sites	641	641
Small site windfalls	161	161
Large site windfalls	0	0
Totals	3,779	3,001

Table 4

Supply source 2023 - 2028	Council	Intelligent Land
Committed large sites	2,834	2,041
Committed small sites	480	480
Small site windfalls	322	322
Large site windfalls	0	0
Totals	3,636	2,843

Table 5

4 Conclusions

- i. The latest data available from the Council covers the period from April 2021.
- ii. The data is lacking in detail, so has proved hard to assess. The Council has not provided any information about planning applications, whether development has commenced, or information from developers/landowners as to when they estimate delivery of dwellings.
- iii. The Council does not have an up to date Strategic Plan, so the housing requirement is based on the standard method.
- iv. The present HDT figure and those for the future, based on the Council's completion projections and the current standard method shows a 5% buffer is to be applied.
- v. New affordability ratios have been published which increases the local housing needs figure when compared to the previous year. As a result, the standard method now only shows a very small decrease in the Council's


housing requirement (720 dpa) compared to the existing annual Local Plan requirement (722 dpa).

- vi. When a 5% buffer is added to the annual local housing need requirement it results in a figure of 756 dpa, or 3,780 dwellings for a five year period.
- vii. Table 6 shows the Council is predicting a 5.37 year supply 2021 to 2026, which equates to only 280 dwellings. IL consider the Council has been over-optimistic and the supply is 4.38 years.
- viii. For the period 2022 to 2026 the Council is predicting its supply is only 5 years, with a deficit of 1 dwelling. IL consider the supply is more realistically 3.97 years.
- ix. The situation deteriorates further from 2023, when the Council's predicted supply is 4.81 years, which is a deficit of 144 dwellings. IL consider the supply is 3.76 years.
- x. On the basis of IL's predictions, the Council is unable to demonstrate a five year supply, and will not be able to do so for the next two five year periods.

Housing Supply Summary	2021-2026		2022-2027		2023-2028	
	BANES	IL	BANES	IL	BANES	IL
Requirement	3,780 (756 dpa)	3,780 (756 dpa)	3,780 (756 dpa)	3,780 (756 dpa)	3,780 (756 dpa)	3,780 (756 dpa)
Supply	4,060	3,312	3,779	3,001	3,636	2,843
Years supply out of five	5.37	4.38	5	3.97	4.81	3.76

Table 6

Appendix 1:

NATIONAL HOUSEBUILDER SALES RATE TAKEN FROM PUBLISHED REPORTS & ACCOUNTS								
	Developer	Report Title	Period	Total Completions (Private & Affordable) Excluding Joint Ventures	Percentage Affordable	Outlets	Completions Per Outlet	Monthly Completions Per Outlet
1	Barratt Homes	Half Year Report February 2022	6 months to end 2021	7,672	23	337	45.53	3.79
2	Taylor Wimpey	Annual Report and Accounts 2021	12 Months	13,929	18	225	61.91	5.16
3	Persimmon	Annual Report and Accounts 2021	12 Months	14,551	17	285	51.06	4.25
4	Redrow	Annual Report 2021	12 Months	5,620	23	117	48.03	4.00
5	Vistry	Annual Report and Accounts 2021	12 Months	6,551	34	143	45.81	3.82
6	Bellway	Annual Report and Accounts 2021	12 Months	10,138	22	270	37.55	3.13
7	Miller Homes	Half Yearly Report August 2021	6 months to end 2021	1,858	21	73	50.90	4.24
8	Countryside	Annual Report 2021	12 Months	5,385	39	61	88.28	7.36
9	Crest Nicholson	Annual Report 2021	12 Months	2,407	20	59	40.80	3.40
	AVERAGE						52	4.35

Appendix 2
Supply Sites Trajectory Assessment as of April 2021 + Exam additions

Source	IL Ref. No.	Site address	Application Reference	Under Construction	Dwellings Outstanding at April 2021	BaNES SUPPLY										INTELLIGENT LAND SUPPLY											
						2021 to 2022	2022 to 2023	2023 to 2024	2024 to 2025	2025 to 2026	2026 to 2027	2027 to 2028	2021 to 2022	2022 to 2023	2023 to 2024	2024 to 2025	2025 to 2026	2026 to 2027	2027 to 2028	2021 to 2022	2022 to 2023	2023 to 2024	2024 to 2025	2025 to 2026	2026 to 2027	2027 to 2028	Diff 2021 to 2026
						2022	2023	2024	2025	2026	2027	2028	2021	2022	2023	2024	2025	2026	2027	2028	2021	2022	2023	2024	2025	2026	
Bath	1	BWR OPA.1 'red & pink land'(St. William/Crest)	06/01733/EOUT	No		0	0	0	188	188	188	188	376	564	752	0	0	0	0	0	80	80	0	80	160	-376	
	2	BWR OPA.1 waste site 'purple land'(B&NES)	19/05471/ERES	No		0	0	0	100	76	0	0	176	176	176	0	0	0	100	76	0	0	176	176	176	0	
	3	BWR OPA car showrooms 'green land'(Renrod, Ston)	20/04315/FUL			0	0	0	0	0	0	50	0	0	50	0	0	0	43	0	0	0	43	43	43	43	
	4	Bath Press	15/02162/EFUL + 20/04760/EFUL(REF'D) 21/05672/EFUL pending			0	0	122	122	0	0	0	244	244	244	0	0	0	0	0	50	100	0	50	150	-244	
	5	MoD Ensleigh - Core Area CCRC (Hanover)	14/01853/EFUL	Yes		72	0	0	0	0	0	0	72	0	0	72	0	0	72	0	0	0	72	0	0	0	
	6	MoD Warminster Road (Firmstone)	14/02272/EFUL + 16/04289/EFUL 20/02921/FUL 20/02926/FUL	Yes		34	34	33	0	0	0	0	101	67	33	34	34	33	0	0	0	0	101	67	33	0	
	7	MoD Foxhill/Mulberry Park (remainder of outline) (Curo)	14/04354/EOUT +17/04829/ERES+ 18/00807/RES+ 18/01881/ERES+ 19/00497/ERES	Yes		70	70	70	70	26	0	0	306	236	166	70	70	70	70	26	0	0	306	236	166	0	
	8	BWR Hinton Garage (Pegasus Life)	16/06188/FUL			0	68	0	0	0	0	0	68	68	0	0	0	68	0	0	0	0	68	68	68	0	
	9	R/O 89-123 Englishcombe Lane (BANES)	18/01516/REG04	No		0	0	0	0	37	0	0	37	37	37	0	0	0	0	0	0	0	0	0	0	-37	
	10	Hartwells Garage	19/01854/OUT	Appeal allowed		0	0	0	0	104	0	0	104	104	104	0	0	0	104	0	0	104	104	104	104	0	
	11	Bath Quays North (BANES)	18/00058/EREG03 + 20/04965/ERES	No		0	0	0	46	46	0	0	92	92	92	0	0	0	46	46	0	0	92	92	92	0	
	12	Bath Quays South (BANES)	16/04818/EREG03	No		0	0	0	0	0	0	30	0	0	30	0	0	0	0	0	30	0	0	30	30	0	
	13	Land at Royal United Hospital (RUH Trust)				0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	14	BWR Comfortable Place	18/00201/FUL			0	0	0	0	25	0	0	25	25	25	0	0	0	25	0	0	0	25	25	25	0	
	15	Land to the west of Sainsburys (care home)	19/03512/FUL + 20/01422/NMA (78 beds)	No	44	0	44	0	0	0	0	0	44	44	0	0	44	0	0	0	0	0	44	44	0	0	
	16	Banglo	16/02527/FUL			16	0	0	0	0	0	0	16	0	0	16	0	0	0	0	0	0	16	0	0	0	
	17	Chivers House	18/03797/FUL			0	0	0	95	0	0	0	95	95	95	0	0	0	95	0	0	0	95	95	95	0	
	18	The Old Bakery PBSA (student accommodation)	18/02831/FUL	No	25	0	0	25	0	0	0	0	25	25	25	0	0	0	25	0	0	0	25	25	25	0	
	19	Bath cricket Club PBSA (student accommodation)	17/04338/FUL (136 beds)	Unknown	54	0	54	0	0	0	0	0	54	54	0	0	54	0	0	0	0	0	54	54	0	0	
	20	Pickfords PBSA (student accommodation)	18/01009/NMA (204beds)		82	82	0	0	0	0	0	0	82	0	0	82	0	0	82	0	0	0	82	0	0	0	
	21	Plumb Centre PBSA (student accommodation)	20/00023/FUL		29	0	0	0	29	0	0	0	29	29	29	0	0	0	29	0	0	0	29	29	29	0	
	22	Hartwells Garage PBSA (student accommodation)	19/01854/OUT (on appeal) (186 beds)		74	0	0	0	0	74	0	0	74	74	74	0	0	0	74	0	0	0	74	74	74	0	
	23	Land at Odd Down Phase 2				0	0	0	0	0	60	80	0	60	140	0	0	0	0	0	0	0	0	0	0	0	
	24	Land at Odd Down phase 1 (Countryside Properties)	17/02588/EFUL	Imminent		0	45	57	44	25	0	0	171	171	126	0	45	57	44	25	0	0	171	171	126	0	
	25	Plymouth House, Bath	18/03554/ODCOU			0	0	0	22	0	0	0	22	22	22	0	0	0	0	0	0	0	0	0	0	-22	
	26	4 -5 Railway Close, Bath	19/00018/ODCOU			0	0	0	21	0	0	0	21	21	21	0	0	0	0	0	0	0	0	0	0	-21	
	27	Everleigh House, Bath	20/01466/ODCOU			0	48	0	0	0	0	0	48	48	0	0	48	0	0	0	0	0	48	48	0	0	
Committed large sites					2878	274	363	307	737	601	248	348	2282	2256	2241	274	295	253	452	351	130	210	1,577	1,433	1,396	-705	
Committed small sites					428	86	86	86	85	85	0	0	428	342	256	86	86	86	85	85	0	0	428	342	256	0	
Small site windfalls					162	0	0	0	0	0	81	81	0	81	162	0	0	0	0	81	81	0	81	162	0	0	
Large site windfalls					0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Total					3468	360	449	393	822	686	329	429	2710	2679	2659	360	381	339	537	436	211	291	2,005	1,856	1,814	-705	

Source	IL Ref. No.	Site address	Application Reference	Under Construction	Dwellings Outstanding at April 2021	BaNES SUPPLY										INTELLIGENT LAND SUPPLY										
						2021 to 2022	2022 to 2023	2023 to 2024	2024 to 2025	2025 to 2026	2026 to 2027	2027 to 2028	2021 to 2026	2022 to 2027	2023 to 2028	2021 to 2022	2022 to 2023	2023 to 2024	2024 to 2025	2025 to 2026	2026 to 2027	2027 to 2028	2021 to 2026	2022 to 2027	2023 to 2028	Diff 2021 to 2026
						2022	2023	2024	2025	2026	2027	2028	2026	2027	2028	2026	2027	2028	2026	2027	2028	2026	2027	2028		
Keynsham	28	Somerdale: Phase 2 (Taylor Wimpey)	13/01780/EOUT + 17/02586/ERES	Yes		41	0	0	0	0	0	0	41	0	0	41	0	0	0	0	0	0	41	0	0	0
	29	Somerdale: Phase 3 (Taylor Wimpey)	13/01780/EOUT + 17/02586/ERES	Yes		67	27	0	0	0	0	0	94	27	0	67	27	0	0	0	0	0	94	27	0	0
	30	Miland House	16/03306/OUT	Yes		0	0	16	0	0	0	0	16	16	16	0	0	16	0	0	0	16	16	16	0	0
	31	213 Bath Road (Care home)	19/05133/FUL	Yes	78 bedrooms	0	0	42	0	0	0	0	42	42	42	0	0	42	0	0	0	42	42	42	0	0
	32	SW Keynsham KE4 (Bloor)	16/02077/FUL	Yes		11	0	0	0	0	0	0	11	0	0	11	0	0	0	0	0	11	0	0	0	0
	33	East of Keynsham KE3a (Crest)	20/02673/OUT (Pending)	No		73	43	43	13	0	0	0	172	99	56	0	0	45	45	45	45	90	135	180	-82	0
			Committed large sites			192	70	101	13	0	0	0	376	184	114	119	27	58	45	45	45	45	384	514	458	8
			Committed small sites			12	12	12	12	12	0	0	60	48	36	12	12	12	12	0	0	0	60	48	36	0
			Small site windfalls			0	0	0	0	0	11	11	0	11	22	0	0	0	0	11	11	0	11	22	0	0
		Large site windfalls			0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
		Total			71	204	82	113	25	12	11	11	436	243	172	131	39	70	57	57	56	56	444	573	516	8
Somerset Valley	34	Old Pit Yard, Clandown, Radstock (Universal)	14/02889/OUT + 18/04153/RES	No		0	0	34	10	0	0	0	44	44	44	0	0	34	10	0	0	0	44	44	44	0
	35	St Peters Factory, Phase II, Westfield (Oval Estates)	14/04003/OUT + 16/04714/RES	Yes		31	31	0	0	0	0	0	62	31	0	31	31	0	0	0	0	62	31	0	0	0
	36	Whealers Road, Midsomer Norton	14/00649/OUT + 16/05424/RES	Unknown		0	0	35	0	0	0	0	35	35	35	0	0	35	0	0	0	35	35	35	0	0
	37	Welton Bibby & Barron, Welton, Midsomer Norton (MNR Real Estate)	16/02607/OUT (on appeal)	No		0	0	0	0	0	50	50	0	50	100	0	0	0	0	0	0	0	0	0	0	0
	38	Radstock County Infants, Radstock (B&NES)	20/02253/FUL + 21/01379/FUL	No	permission 9	0	0	0	0	9	0	0	9	9	9	0	0	9	0	0	0	9	9	9	0	0
	39	Ryman Engineering services	17/05597/FUL	Unknown		0	0	10	0	0	0	0	10	10	10	0	0	0	0	0	0	0	0	0	0	-10
	40	The Shambles, Wells Road	17/04186/FUL	Unknown		0	0	10	0	0	0	0	10	10	FALSE	0	0	10	0	0	0	10	10	10	0	0
	41	Silver Street (care)	18/02095/OUT + 20/02303/OUT	No		0	0	0	20	25	0	0	45	45	45	0	0	36	0	0	0	36	36	36	-9	0
	42	Silver Street, Midsomer Norton	18/02095/OUT + 21/00971/RES (Pending)	No		30	35	20	0	0	0	0	85	55	20	10	20	15	20	20	0	0	85	75	55	0
	43	Mirage Ink Ltd	17/06244/FUL 21/01196/FUL			0	0	14	0	0	0	0	14	14	14	0	0	5	0	0	0	5	5	5	-9	0
	44	Radco	18/05623/OUT			0	0	0	0	26	0	0	26	26	26	0	0	28	26	0	0	54	54	54	28	0
	45	Bath Old Road	17/03926/OUT + 21/01122/RES			0	0	0	0	26	0	0	26	26	26	0	0	0	0	26	0	0	26	26	26	0
	46	Polestar, Paulton (2b) (Bovis)	14/03142/FUL 19/03475/VAR	No		0	35	0	0	0	0	0	35	35	0	0	35	0	0	0	0	35	35	0	0	
	47	Polestar, Paulton (3) (Bovis)	15/00293/FUL	Yes		38	0	0	0	0	0	0	38	0	0	38	0	0	0	0	0	38	0	0	0	0
	48	Greenlands Road, PSJ (Curo)	16/03829/RES			0	0	30	30	29	0	0	89	89	89	0	5	35	35	14	0	89	89	84	0	
49	17 Station Road, Midsomer Norton	20/00241/FUL			0	0	0	0	9	0	0	9	9	9	0	0	0	0	0	0	0	0	0	0	0	
		Committed large sites			99	101	153	60	124	50	50	537	488	437	79	91	157	132	69	0	0	528	449	358	-9	
		Committed small sites			20	20	20	20	20	0	0	100	80	60	20	20	20	20	0	0	25	25	100	80	60	0
		Small site windfalls			0	0	0	0	0	25	25	0	25	50	0	0	0	0	25	25	0	25	50	0	0	
		Large site windfalls			0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
		Total			119	121	173	80	144	75	75	637	593	547	99	111	177	152	89	25	25	628	554	468	-9	
Rural	50	Freshford Mill, Freshford (EnvironComs)	14/05048/FUL + 16/06132/FUL + 16/06133/FUL	Yes		14	0	0	0	0	0	14	0	0	14	0	0	0	0	0	14	0	0	0	0	
	51	Wheeler & Co, Timsbury (Flower & Hayes)	19/02095/FUL	Yes		0	7	10	9	0	0	0	26	26	19	0	0	7	10	9	0	26	26	26	0	
	52	Wells Road, Hallatrow	15/01335/OUT + 19/00035/RES	Unknown		0	0	15	0	0	0	0	15	15	15	0	0	15	0	0	0	15	15	15	0	
	53	Water Street, East Harptree	14/05836/FUL	No		0	0	0	8	0	0	0	8	8	8	0	0	0	8	0	0	8	8	8	0	
			Committed large sites			14	7	25	17	0	0	0	63	49	42	14	0	22	10	17	0	63	49	49	0	
			Committed small sites			43	43	43	43	42	0	0	214	171	128	43	43	43	42	0	0	214	171	128	0	
			Small site windfalls			0	0	0	0	0	44	44	0	44	88	0	0	0	0	44	44	0	44	88	0	
		Large site windfalls			0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
		Total			365	57	50	68	60	42	44	44	277	264	258	57	43	65	53	59	44	44	277	264	265	0
KEY					Committed large Sites	579	541	586	827	725	298	398	3,258	2,977	2,834	486	413	490	639	482	175	255	2,510	2,199	2,041	-748
= Dispute Figure					Committed small sites	161	161	161	160	159	0	0	802	641	480	161	161	161	160	159	0	0	802	641	480	0
= Disputed Site					Small site windfalls	0	0	0	0	0	161	161	0	161	322	0	0	0	0	161	161	0	161	322	0	
No. = New site or new information in Examination data					Large site windfalls	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
					Total	740	702	747	987	884	459	559	4,060	3,779	3,636	647	574	651	799	641	336	416	3,312	3,001	2,843	-748