

BATH AND NORTH EAST SOMERSET - CORE STRATEGY EXAMINATION

AGENDA - ISSUE 2: BATH SPATIAL AREA

Days 3 & 4

The agenda broadly follows the structure of the questions set out in ID7 focussing on matters I want to explore further.

Delivery of main housing sites

1. Are the SHLAA trajectories for the Western Riverside reasonable? BNES/7, 4.2.1 - 2 refer to the Council's Corporate Agreement with Crest. Beyond Phase 1, what proportion of Western Riverside (SHLAA Wes 1) is owned by other parties and what are their intentions for development of their land?

2. It is agreed that the removal of the *Windsor Gas Holder* is critical to enable delivery of Bath Western Riverside.

- BNES7 4.3.2 refers to a total of 450 units being deliverable if the gas holder is not removed. Would its retention also preclude residential development on other SHLAA sites nearby?
- Representations on behalf of Tesco/St James Development refer to a developer's agreement to secure the removal of the gas holder subject to planning permission being granted for the current application on the Bath Press site. What is the timetable for delivery in this agreement and does the work have to be undertaken? This representation refers to a total works package of 3 years, whereas the Council refer to 2 years – how long is the work likely to take?
- If the above agreement does not come into effect, who does the Council see as the lead party in taking forward the removal of the gas holder? What interest/incentive would the lead party have in progressing the matter to enable the SHLAA trajectory to be met? How would the cost be met?
- In addition to the necessary removal of the gas holder and related infrastructure (to remove the HSE's embargo on development around the site) are there additional significant works in relation to decontamination of the site to enable residential development of this land?
- In the light of all the above, does the need to remove the gas holder and related work undermine confidence in delivery at Bath Western Riverside?

3. It is also agreed that provision of upstream compensatory flood storage is required to enable delivery of the Core Strategy's intentions for Bath Riverside. The technical/engineering issues relating to the delivery of this project will be discussed at later hearing, to be informed by a statement of common ground between those submitting technical evidence on the matter.

- Does the Council's timescale/cost assume implementation on Council own land (BNES/7 4.4.2 - 3)?
- Is there likely to be sufficient public funding to enable this project to proceed as planned (BNES/7 4.5.4)?
- If the scheme cannot be delivered as planned what is the effect on the Strategy? What is the scale of development (including housing) that would be at risk?

4. Can the relocation of existing businesses within the river corridor necessary to implement the strategy occur without a forced loss of businesses/jobs in Bath? Is the Council realistic in assuming that relocation can be accommodated through vacancies and churn of existing employment sites?

5. Are the SHLAA's expectation for housing delivery from the 3 MOD sites realistic? Are changes PC18, PC34 (as amended) and PC35 justified and needed to make the plan sound? Does paragraph 2.22 of the Core Strategy need further updating?

6. Given the Council's acknowledgment that additional potential capacity at the MOD sites is less about contingency and more about possible greater capacity (BNES/7 4.9.2) should paragraph 1.36 of the Core Strategy, which refers to this contingency, be changed/deleted?

7. Is the planned increase in the number of jobs/housing consistent with the aim of policy B1 4a and b for a better balance between jobs and resident workforce? (This question intended for any additional points not already discussed under Issue 1.)

8. Is self containment *from 70% to nearer 80%* (Policy B1 4 b) likely with the level of homes proposed? Is this measure of self containment (which relates to city residents with city jobs) the most appropriate measures given the 48% of jobs in the city filled by workers living outside the city (BNES/7 2.11.1)?

9. Is the scale of change in office and industrial floorspace in policy B1 2a-e consistent with the evidence and the Council's assumptions about economic growth?

Newbridge/Twerton Riverside

10. On the evidence before me I am satisfied that Newbridge Riverside should be retained for industrial use, as reflected in a number of published changes. This does not appear to be strongly challenged. The Council has clarified (BNES/7 4.13.2) that Policy B3, part 4 b ci and cii are not intended to apply to Newbridge Riverside. This would be consistent with its retention, as envisaged. The Council consider that this aim is already implied, but it was not clear to me or others. Council to put forward a change (eg sub heading) to make it clear that these parts are intended to refer to Twerton Riverside only.

11. Is a more flexible approach to future uses at Twerton Riverside, as put forward in various proposed changes (and clarified above), justified?
12. Can Twerton Riverside be a meaningful contingency for housing development if it is firstly intended to be a contingency area for office development (paragraph 2.543 of the Core Strategy and PC53)?

Bath Transport

Before Christmas the Department of Transport approved the next stage of funding for the Council's revised bid for a Bath Transportation package. There is now less uncertainty than contemplated in some of my previous questions.

13. Will the package of transport measures achieve the aim of Objective 7 and that part of the Bath vision (after 2.09) *to keep the city moving*?
14. Is the planned mixed use development of Avon Street and Manvers Street car parks still a realistic part of the strategy if car parking needs to be retained as well (or similar capacity provided elsewhere in the centre)?
15. Does PC51 reasonably summarise the transport proposals now being pursued relevant to Bath?
16. What effect will the strategy for Bath and the package of proposed transport measures have on air quality?

Other Bath Matters

City Centre boundary

17. I have previously sought to better understand the Council's intention re the Central Area and the City Centre boundary. Any further discussion?

Proposed sports stadium

18. The representation from Arena 1865 Limited (Rep No 297) suggests a revised wording (4.3 of statement). Is this necessary for soundness?
19. The Council notes BNES/7 (6.3.1) that planning policy support for a new sports stadium does not resolve issues regarding the charitable status of the Recreation Ground. This is clearly a possible impediment to delivery but I do not propose to explore that background further. Would any inability to deliver the proposed stadium have strategic consequences for the rest of the strategy for Bath?

The matters below are currently timetabled to be discussed on Day 4

WHS

20. Can the WHS be adequately protected without designation of a buffer? Does the WHS boundary already encompass significant elements of the setting of the qualities of set out in the Statement of Outstanding Universal Value? (A proposed change to CP6(2), agreed with English Heritage (BNES/18), indicates that there will be a WHS Setting SPD.)

Universities

21. Is there a need to accommodate/facilitate additional off-campus, purpose-built student accommodation?

- Is there local evidence to demonstrate that such additional provision either would, or would not, release existing student HMO back to the general or be likely to encourage more students to come to Bath?
- Should new purpose-built student accommodation be counted as part of the housing supply?
- Is there any up to date evidence as to expected growth at the Universities?

22. Is PC 47 justified and required to make the plan sound?

Addendum Note added Wednesday 18th January 2012

Day 4 Other Bath Matters – WHS Friday 20th January 2012

Additional Item for discussion

The Duchy of Cornwall will comment on the potential impact of an urban extension at Twerton on the setting of the WHS. The effect of alternative proposals on the WHS is intended for discussion under Issue 3 Green Belts, but prior to the Agendas being published The Duchy had anticipated raising the matter here, as indicated in its hearing statement. The Duchy's representative on this matter cannot come when issue 3 is discussed. The Council has helpfully agreed to accommodate this item on Friday. There will inevitably be some overlap when possible urban extensions are discussed under Green Belt

**Simon Emerson
Inspector
10 January 2012**