

Bath and North East Somerset

**Core Strategy Topic Paper 8
Central Bath/River Corridor
Site Capacities and Delivery**

September 2011

**Bath & North East
Somerset Council**



Bath and North East Somerset
Local Development Framework

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Introduction

1. This paper has been prepared to assist the Inspector on the capacity and deliverability of sites within central Bath/river corridor. This is in response to the Inspector's preliminary comments and questions note (ID/1), where he requests a topic paper which brings together and identifies the relevant material that has informed the Council's assessment of these sites.
2. The Inspector asks a series of specific questions in relation to the capacity estimates of sites in central Bath/river corridor (see in particular paragraph 9 of ID/1) and in identifying relevant material underpinning capacity estimates this Topic Paper answers these questions. The Inspector also acknowledges in paragraph 11 of ID/1 that the Core Strategy is not making site specific allocations and it will be the role of the forthcoming Placemaking Plan (a Development Plan Document) to resolve the detail of the type and scale of development on particular sites. Therefore the Core Strategy does not, and should not, seek to set out detail beyond its strategic remit. However, the delivery of sites in central Bath/river corridor is crucial to the strategy and therefore, the Topic Paper will assist in assessing the robustness of capacity estimates.
3. PPS25 (as does the emerging National Planning Policy Framework) requires that Local Planning Authorities (LPAs) allocating land in LDDs for development should apply the Sequential Test to demonstrate that there are no reasonably available site in areas with a lower probability of flooding that would be appropriate to the type of development or land use proposed. The Core Strategy does not allocate any specific sites, but because it contains place based policies with identified locations for development with key development principles, high level sequential and exception tests were undertaken. (CD6/D4). To ensure flood risk is taken into account at all stages in the planning process, a sequential approach will also be taken within central Bath/river corridor and further sequential/exception test will be applied at the site allocations stage.

Capacity of sites in Central Bath and River Corridor

SHLAA

4. The draft Core Strategy proposes the development of about 6,000 homes for Bath during the Plan period. The Strategic Housing Land Availability Assessment (SHLAA) Findings Report 2.1 (CD4/H13 & H14) identifies about 3,500 of these in the central area/river corridor with the remainder in outer Bath. These main development sites are showed in the map below.
5. The deliverable/developable supply estimate does not include a small sites 'windfall' allowance for 10 years from the anticipated date of the adoption of the Core Strategy (April 2012). However, a small site windfall allowance of 45-60dpa could be identified for Bath from 2022/23 onwards. This is based on a District wide allowance of 100-140 over the same period as set out in the SHLAA .

		Achievability			
		Built	Deliverable	Developable	
	Total	2006/07 - 20010/11 Years 1-5	2011/12 – 2015/16 Next 5 years	2016/17 – 2020/21 Further 5 years	2021/22 – 2025/26 Final 5 years
Bath	6224	886	1114	1993	2231
Central Bath/River corridor	3495	129	419	1276	1681

6. To inform the SHLAA (CD4/H6 and 7) and the preparation of the Core Strategy, the Council commissioned an urban design led review of the development capacity of areas of potential significant change within and adjoining the city centre. This reported in two stages.
 - Urban Design led review of Bath City Centre Sites (May ,2009) **CD4/CDL15**
 - Urban Design led review of BWR East /Green Park Station (April 2009) **CD4/UDL16**
7. This work drew on previous urban design exercises undertaken by and on behalf of the Council and on relevant planning policy guidance. The Bath Western Riverside SPD (CD5/14) was particularly important in this regard.
8. Each study presented conclusions in terms of the floorspace that could come forward within each area. A 20% 'sensitivity' reduction was then applied in recognition of the fact that the level of analysis was 'strategic' and that given the special design considerations prevalent in Bath, more detailed work at Placemaking Plan / Development Management stage might reveal unforeseen constraints. Whilst the consultant team were confident about the validity of their

conclusions the Council adopted a figure equivalent to 80% of the consultant's identified capacity as a defensible minimum capacity for the Central Area. This quantum of change was used in the SHLAA.

9. The SHLAA assumes the land use mix of these areas in central Bath will be predominately commercial in nature with residential floorspace performing an important but secondary role in order to reflect the characteristic 'lived in' nature of the Central Area. Therefore, the employment and housing assumptions can be regarded as generally being reflective of an appropriate city centre and environs land use mix.
10. The Bath ERDP (CD4/E4) is based on the same capacity work and therefore adopts the overall floorspace capacity figures derived from the urban design commission and used in the SHLAA. The ERDP, as it applies to the Central Area, therefore confirms the commercial emphasis placed on these areas in the SHLAA.
11. The urban design led review work was undertaken prior to the Bath Buildings Height Study (CD4/UDL2-5). To ensure consistency, the consultant who was involved in the urban design led review work was also engaged by the Council to oversee the Buildings Height Study. Sites within the bend of the River Avon are within 'Zone 1: The Georgian City' of the Height Strategy. The key recommendation for this zone is that development is related to the existing prevailing heights of nearby Georgian buildings. This recommendation sits comfortably against the 80% of urban design capacity assumption adopted by the Council within the SHLAA. In some instances e.g. at Cattlemarket / Hilton the Building Heights Study would enable 100% of capacity to be realised. At Avon Street, the largest potential city centre site, the urban capacity study considered 6 storeys. Given the absence of nearby Georgian buildings and the strong contextual clues given by tall riverside heritage assets and other neighbouring buildings a strong case can be made within the Placemaking Plan to achieve 6 storey skyline accents along the river at this point. The Urban Design review assumptions in relation to land on the apex of the bend of the river are validated by the Height Strategy to the extent that 100% of identified capacity could be achieved.
12. BWR East / Green Park Station benefit from site specific planning policy and heights guidance in the BWR SPD. The urban design scenarios and capacity assumptions produced for this area are consistent with the SPD and the provisions of Zone 3: Valley Floor of the Heights Strategy. Since the Buildings Height Study was completed the first phase of BWR has been granted consent and is now under construction and this provides a new high density contextual cue for the BWR East Area.

13. Therefore, the Building Heights Strategy has validated rather than informed earlier urban design led capacity assessments

Flood Risk relating to the sites in Central Bath and River Corridor

14. The assessments in SHLAA have been prepared in light of the PPS25 sequential test (see Draft Core Strategy Information Paper – Flood Risk Sequential and Exceptions Test, CD6/D2) that justifies the strategy of regeneration of sites in the River Corridor. It therefore assumes the implementation of the flood mitigation strategy. Paragraph 1.9 of BNES/2 addresses the circumstances where sites occupy land in more than one flood risk zone.

Availability of Public Funding to assist with site preparation and infrastructure

15. The most up to date information of the availability of public funding to assist with site preparation for key sites is the Single Conversation: West of England Delivery & Infrastructure Investment Plan (CD4/I4), which relates to sites in Keynsham, the Somer Valley, and Bath City Riverside. It includes £28 million of funding to support the delivery of affordable housing and supporting infrastructure at Bath City Riverside.
16. This funding is to be accessed through specific bids and would be subject to the availability of finance at the time. The level of funding identified is still anticipated as the HCA continue to support Bath City Riverside as a priority location and in principle are prepared to commit funds to secure delivery of the associated housing and jobs.
17. To date the HCA have committed £8million towards affordable housing and infrastructure at BWR. The Council have also had initial discussions with them on flood mitigation and the removal of the Windsor Gas Station and have been asked to submit an outline proposal on the latter. Flood mitigation is likely to cost £3-5million and removal and remediation of the gas station approximately £11million.
18. It should be noted that the level of funding identified in the Single Conversation: West of England Delivery & Infrastructure Investment Plan is an estimate of the infrastructure costs required to enable development. It was never anticipated that all of this funding would come from the HCA. Indeed the most recent discussions have identified contributions to be made by other bodies such as the Council and Developers to meet these costs.

Ministry of Defence sites

19. The MoD have announced that all Bath MoD staff will be relocated to Abbey Wood. With the exception of part of the Ensleigh site which for operational reasons is required until 2018, all other sites will be vacated in March 2013.
20. It is the MoD's intention to market all three MoD sites in early 2012 with a view to disposal in 2012/13. Leaseback arrangements would be put in place to enable continuation of use until relocation is required as described above. The Council is now working with the MoD to prepare Concept Statements for the sites as part of the Placemaking Plan DPD.

What are the implications if this funding is much reduced?

21. The Council has recently commissioned consultants to prepare a financial evaluation model associated with the delivery of the City of Ideas, Bath's economic regeneration delivery plan are, as indicated on the plan below.
22. This will enable the Council to better consider its own financial management priorities, and to allocate financial resources where appropriate to enable the delivery of development and associated infrastructure.

