

Bath and North East Somerset

Bath Central Area: Development Issues and Redevelopment Zones



Core Strategy Information Paper
November 2009

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**Bath & North East
Somerset Council**



Introduction

- 1.1 This paper is introduced on page 90 of the Core Strategy Options Consultation and will aid the evaluation of 'Strategic Options for Central Bath'. The paper comprises two parts:

Part 1: Development Themes and Issues for the Central Area

- 1.2 This section sets out a number of considerations related to the role of the Central Area that must be addressed in the Core Strategy. This sets up the 'strategic options presented on pages 91-95 of the Core Strategy options document.

Part 2: Redevelopment Zones within the Central Area

- 1.3 To support the Core Strategy as it affects the river corridor in Bath, a Regeneration Delivery Plan (RDP) will be produced for the area. Much of its focus will be on the Central Area. This section hints at the debates that will remain to be had as part of the preparation of the Regeneration Delivery Plan and makes some initial observations about the characteristics of some likely areas of change within the central area and their potential future use. It also considers the characteristics and attributes of the areas that have been identified. For the Core Strategy it is important to consider whether these areas can deliver the strategic growth proposed. The forthcoming RDP needs to consider whether they lend themselves to a particular mixed-use environment.
- 1.4 The following studies should also be read alongside this information note.
- Business Land and Employment Growth Study
 - Retail Study
 - Draft Strategic Housing Land Availability Assessment
 - Urban Design Review of Bath City Centre Sites
 - Urban Design Review of Bath Western Riverside East

These are available on the Councils Website at www.bathnes.gov.uk

Part 1: Development Themes and Issues for the Central Area

The Shopping Environment and Public Transport Interchange

What's happening now?

- 2.1 Transformation is already underway in the Central Area at the southern end of the main north-south retail axis where the 1970s Southgate shopping centre has been demolished to make way for its contemporary replacement.
- 2.2 The new Southgate development will likely meet the need, together with the smaller scale scheme at Milsom Place, for additional retail units for the next 10 years. Together they will bolster the shopping profile and experience generating around 900 jobs.
- 2.3 When Southgate is fully open in 2010 there will be a modest over-supply¹ of floorspace in Bath, though this is forecast to be made good by rising expenditure and it is expected that the city centre will settle to a new state of equilibrium (between floorspace, turnover and expenditure) soon after. Bath's pre-eminent retail priority during the next few years is to secure the successful implementation and operation of Southgate and the absorption of the new floorspace into the trading patterns of the City. There will inevitably be some change within the primary shopping area as retailers relocate into new units and older shops are vacated. It is essential to the future health of the historic core that such units are quickly taken up by new occupants to safeguard the fabric of the buildings.

Looking to the future

- 2.4 In view of the importance of Southgate to the future of the city centre it is important to ensure that other retail commitments are not made that could undermine commercial confidence in executing the scheme and securing its full occupation and integration into the city centre.
- 2.5 However, projections suggest that from about 2021 onwards, population growth and rising expenditure across Bath's catchment area could support a further increase in retail floorspace on a similar scale to Southgate, or a number of smaller but still substantial developments. The Retail Study forecasts capacity of between 25,000 sqm and 35,000 sqm (in addition to Southgate).
- 2.6 It will take some time for Southgate to be absorbed into the trading patterns of the city. Therefore the need to work up detailed proposals for any subsequent phase of city centre retail development is not immediate. A period of monitoring and evaluation will be needed to test the validity of long term projections, which should be treated with caution at this stage. Predicting and providing could result in a situation where the city centre becomes saturated with retail floorspace to the detriment of the overall sense of place and the achievement of other planning objectives.
- 2.7 However, the Core Strategy must consider the strategic implications of how any longer term retail development (whether within or beyond the RSS period) might affect the

¹ This means that the expenditure drawn to Bath will be less than the benchmark turnover for the amount of retail floorspace that is traded from. See Retail Strategy (November 2008) for more information.

overall strategy for the Central Area as it considers the needs of many sectors and activities, some of which will require space sooner rather than later.

- 2.8 Any longer term retail development(s) would have to respect the existing compact nature of the core shopping area. This is a feature which should be retained in a manner that secures the optimum use of under-used central sites that have the most to contribute to the retail offer and to the image, repair and conservation of the urban fabric at the heart of the World Heritage Site. Any extension of the primary shopping area, beyond Southgate, would need to be well related to the existing core both physically and psychologically, taking opportunities to introduce walkable shopping circuits or loops. The longer term retail potential of any suitable edge-of centre locations must be considered (given the choices that will need to be made between competing development pressures in the city centre) provided that they form a natural extension of the city centre shopping area, can be truly integrated into it and do not have an adverse impact on its vitality and viability.
- 2.9 Debates around longer term expansion beyond the primary shopping area must be sensitive to the fact that the city centre relies to a large extent on the success of its retail function to provide economic support to its historic buildings. Many of the retail units in the centre are far from ideal to support contemporary mainstream retailing and therefore to ensure that its attraction to retailers is maintained, new development outside the core which could divert shoppers and therefore reduce the attraction of the core area should be avoided.
- 2.10 The preferred strategy for the long term evolution of the shopping environment must be developed as part of a holistic mixed-use approach for the city centre. The strategic options are presented and evaluated in the Core Strategy Options consultation document. Whichever approach is pursued it will be necessary for any expansion of the retail core to occur via a series of commitments to be made in a series of well-defined steps accompanied by concerted and clearly identified measures to drive through and secure implementation, including the use of compulsory purchase powers to assemble sites if necessary. The forthcoming Regeneration Delivery Plan Supplementary Planning Document for the Bath River Corridor will bring the site specific means of delivering the Core Strategy into focus.

Retail warehouse/large format stores

- 2.11 There is a medium term need for a modest amount of additional large format retail floorspace and capacity is forecast to grow into the longer term. This format of retailing often focuses on the display and sale of items commonly referred to as bulky goods such as DIY, hardware, furniture, floor coverings, carpets and other household goods. The Core Strategy must determine whether it is possible for the centre of Bath to accommodate the retailing of these types of goods or whether alternative retail formats are needed in locations elsewhere in the city.
- 2.12 Whilst it is possible for such goods to be sold from 'high street' units as already evidenced in Bath it is unlikely that sufficient units of sufficient size could be incorporated into city centre and edge of centre locations. In historic city centres it is difficult to provide the particular building formats that many retailers of these goods require. In Bath it is certainly difficult to identify suitable city centre and edge-of-centre

locations for large format stores as this form of development is generally incompatible with the image character and appearance of the World Heritage Site.

- 2.13 Within the Fracture Area², Riverside East and Green Park Station represent a major brownfield redevelopment opportunity. However retail warehouse development surrounded by open car parking would not be appropriate for a site which should form high density, high-quality development area enhancing the character and status of the city. As can be seen from the existing Homebase store such retailing is often land hungry and does not make best use of such locations. Any expanded retail role at this location would have to be based around more imaginative and flexible design solutions. Consideration will need to be given as to whether this is realistic
- 2.14 There are already some out-of-centre retail warehouse development in the Lower Bristol Road Zone at the Weston Lock Retail Park. If it is determined that it is not possible and/or desirable to accommodate large format retailing closer to the city centre it may be more appropriate to consolidate provision here subject to tests of impact on the city centre and nearby local centres.

Public Transport Hub

- 2.15 As part of the regeneration of Southgate, a new public transport interchange will connect local bus services to sub-regional and national rail networks. A new civic plaza will form part of a revamped entrance to the city. In combination these projects will combine to create a befitting southern gateway to the centre of Bath.

More and Better Places to Work

- 2.16 Much has been said about shopping, however, the city centre is not just a 'machine for retailing'. Whilst Bath is witnessing progress in the development of its shopping offer, the same cannot be said for office accommodation where (until very recently) a reasonable level of demand led by financial services, professional practices and publishing/media companies, has not been accompanied by a sustained supply of good quality workspace. Additional demand for office workspace is likely to be generated from local entrepreneurs and companies spinning out of Bath's higher education institutions. The University of Bath maintains its Carpenter House Innovation Centre in the city centre and if it is to build on this success, additional managed workspace is likely to be needed. The lack of supply is more acute bearing in mind that a significant proportion of current stock is contained within Georgian properties, which although enjoying a desirable central location, possess internal layouts not well suited to current needs.
- 2.17 The provision of high quality modern commercial accommodation of sufficient quantity in central Bath will be crucial to the diversity and future health of the city, district and sub-regional economy. The Business Growth and Employment Land Study (BGELS) recommends that new office space should ideally be clustered so as to provide profile, presence and critical mass, in acknowledged office sectors or quarters. The current economic climate should not mask the need to think about the need for change over a longer time period.

² See diagram 17, p.87 of the Core Strategy Options document

- 2.18 The BGELS translates a long term economic growth scenario of 2.8% GVA per annum into a forecast for 17,000 new jobs in B&NES. Further, it breaks this figure down by sector. It estimates that of total growth in employment about 7,750 will be in sectors that operate from office accommodation. This equates to a need for about 140,000 sqm of office space during the RSS period.
- 2.19 Both District-wide Core Strategy options seek to direct the majority of office based employment growth to Bath so that it accommodates between 5,000 and 5,800 jobs. This equates to 65% to 75% of overall growth. In 2006 Bath maintained a 66% share of all employment across the district and 77% of all office employment in the district. Thus, the options for employment distribution are considered reflect the reasonable range of alternatives given Bath's economic status and role in the West of England.
- 2.20 The Core Strategy Options consultation considers the options for accommodating this at Bath. The Core Strategy Options present options for determining what proportion of the space directed to Bath should be located within the central area and in what form, having regard to the demand for land from other city centre uses. The approach to the central area (i.e. its role/ strength of focus for new office space) will have implications for the apportionment or non-apportionment of space to others parts of the city including the proposed urban extension.
- 2.21 It is important to state that the Council considers that the need for office space is likely to be more keenly felt during the first half of the RSS period than the need for additional retail development (given the progression of Southgate). It is acknowledged that at present there is very little occupier demand but it is considered prudent for the Core Strategy to plan for longer term recovery and subsequent economic cycles.
- 2.22 Should new office stock come to the market at a sufficient rate the opportunity could arise to shift the balance towards modern space and away from Georgian space, enabling the switch of city centre Georgian properties to other uses. Appropriate thresholds and triggers will have to be determined in due course.

Other City Centre Uses including Housing

- 2.23 Successful city centres contain a mixture of uses and activities. Alongside retail and office, proposals for other functions and activities, such as leisure, entertainment facilities and recreation uses (including cinemas, restaurants, bars, pubs, night clubs, casinos, health and fitness centres), arts, culture and tourism (theatres, museums, galleries, concert halls and visitor accommodation), will be directed to the central area.
- 2.24 Bath's special mix of these elements allows it to position itself as a destination for 'pleasure and culture'. This theme is a pillar of the 'Future for Bath' work previously undertaken by the Council and is an attribute that should be nurtured through in the LDF via the allocation of land for such uses. The Core Strategy can begin this process at the strategic level.
- 2.25 Recent developments such as the Odeon cinema complex on James Street West, the Thermae Bath Spa and the conversion of the former Beau Nash cinema into a 400 seat music, cabaret, comedy and live literature venue are representative of such uses. Other projects are also ongoing such as the renovation of Gainsborough Buildings to form a 5 star hotel. A forthcoming Visitor Accommodation Study is formulating a strategy for

managing and enhancing the cities portfolio of hotels and guesthouses. Further, a feasibility study³ commissioned by the Council considers that the city would benefit from a further new small to medium sized performance venue and the city has successful bid for a small casino licence.

- 2.26 The benefits of introducing further 'urban living' into the land use mix of the city centre are well established. A study of housing potential of city centre redevelopment opportunities⁴ (Strategic Housing Land Availability Assessment) suggests that around 600-800 dwellings (likely flatted accommodation) could be incorporated into the land use mix either on upper floors of mixed use developments or as stand alone proposals.

Car Parking

- 2.27 There are many on-street and off-street parking spaces serving the central area. In order to arrive at a preferred approach for the future growth and development of the city centre, decisions will need to be made about the level of car parking that should be in place to service its functional role. Work on a Parking Strategy for Bath is underway and is anticipated to report in 2010.
- 2.28 The broad options are to reduce, maintain or increase the amount of car parking (either absolutely or relative to the amount of activity trips with the city centre as a destination) Work on the implications of these approaches is ongoing. Key issues are the relationship between levels of car parking on the vitality and viability of the primary shopping area, the attractiveness of central Bath as an employment location, congestion, air quality, the public realm and the overall environmental quality of the World Heritage Site. A number of car parks are identified as potential urban renewal opportunities. The development potential of any identified opportunity will be formulated in parallel with the strategy for car parking.

³ Reinventing Bath: a call for leadership and strategic planning to deliver a resort of the future (October , 2007)

⁴ Draft Strategic Housing Land Availability Assessment (October, 2009)

Part 2: Redevelopment Zones within the Central Area

Shaping Change within the Central Area

- 3.1 Ongoing work to establish the floorspace potential of urban renewal opportunities in city centre and edge of centre locations suggests that there is likely to be a mismatch between that which is forecast to be required and that which could be supplied⁵.
- 3.2 This holds true under both the maximum and minimum concentration strategic options presented in the Core Strategy Options consultation. Therefore it is reasonable to conclude that it will not be possible to accommodate all of Bath's projected need for commercial type development in city centre and edge of centre locations alone. Bath will need to expand its city centre activities not only into sites very close to the centre but also see these uses penetrate further west into the BWR East/Green Park Station/South Quays area. The expanded city centre and new commercial locations beyond (See Figure 18 of Core Strategy Options consultation) will need to be carefully integrated both physically and psychologically to the existing core with high regard given to the way that people currently move around the central area and can be expected to do so in the future.
- 3.3 Once the preferred overall quantitative role of the Central Area has been determined it will be necessary for the Regeneration Delivery Plan Supplementary Planning Document to set out in more detail how the Council wishes to shape change within the central area.
- 3.4 It is considered there are three broad areas to 'play with' as alluded to in Diagram 17 in the Core Strategy Options consultation. These are; City Centre (solid red line), edge of centre (dotted orange line) and BWR East /Green Park Station/ South Quays (dotted black line).
- 3.5 Two alternative approaches are currently being explored:

Directing shopping uses most centrally
- 3.6 This approach would prioritise the need to accommodate the forecast need for longer term comparison shopping space (i.e. a post Southgate phase of expansion) within city centre and city fringe locations.
- 3.7 As Southgate meets the foreseeable need for comparison goods floorspace, this approach would mean reserving land in the most central locations for a subsequent phase of retail expansion. This approach would serve to ensure the maintenance of a compact 'single destination' retail core well into the future and enable longer term retail projects to dovetail closely with the current extent of the primary shopping area.
- 3.8 After reserving sufficient land in the city centre and city fringe for retail uses the remaining opportunities (either separate locations or the upper floors of mixed used

⁵ From a floorspace and urban design perspective. There may also be deliverability issues to resolve if development is to come forward during the RSS period.

sites with ground floor active frontages) would be apportioned to office space alongside other city centre uses.

- 3.9 The focus on retail would require land in the BWR East /Green Park Station/ South Quays area to be identified as a new secondary office location to supplement any floorspace that could come forward in the city centre and city fringe.
- 3.10 The extent of the secondary office element would vary depending on whether the maximum or minimum concentration approach is taken as alluded to in the Core Strategy options consultation.
- 3.11 Such a strategy would not necessarily make the identified land unavailable for alternative uses in the short to medium term. Imaginative solutions involving the creation of adaptable buildings and flexible floor plans and frontages should be pursued to enable the ground floors of reserved sites to revert to shopping uses at some point in the future, subject to evidence that projections of retail growth are holding true, market demand and reviewed planning policy.

Directing office uses most centrally

- 3.12 There is a short to medium term need for more office space compared to a potential longer term opportunity for a further phase of retail expansion. Given that there is more certainty around the requirement for business accommodation this approach is designed to accommodate that need on the most sequentially preferable city centre and city fringe locations should they become available.
- 3.13 It would be highly desirable from an office occupier's perspective to have a volume of space close to the public transport hub in a development that forms part of a distinct and identifiable quarter of business enterprise. The development of such quarters in high profile, conspicuous and accessible locations would make a statement about the city's intentions to diversify its economy away from tourism, retailing and public sector activity
- 3.14 Examples of modern clustered office space such as can be seen at Temple Quay adjacent to Bristol Temple Mead Station exhibit many 'dead' frontages at ground floor level and these predominately single use environments cease to become any kind of destinations after normal working hours and at the weekend. The core area of Bath would require a much more sensitive treatment of the street scene so that active uses were incorporated.
- 3.15 Given the volume of office space that this would involve it is likely this approach would result in the need for a secondary shopping destination to be created in the BWR East / Green Park Station Area to supplement any space that could come forward more centrally.
- 3.16 Therefore, the flip-side to creating a stronger statement about Bath's business future might be a reduced likelihood of the city maintaining such a compact primary shopping area in the longer term, as a greater proportion of development to meet future retail growth goals would have to 'leap-frog' the city fringe and find form in the Green Park Station area.

3.17 The extent and nature of the secondary shopping element would vary depending on whether the maximum or minimum concentration approach is taken. Under the maximum concentration approach this area would accommodate all types of spillover retailing space (high street and bulky goods); under the minimum concentration approach it would just accommodate high street spillover.

Urban Renewal Opportunities

City centre

1. Historic Core
2. Station Area (Southgate)
3. Manvers Street Car Park, Avon & Somerset Police Station and Royal Mail Depot area
4. North of Pulteney Bridge (Cattlemarket, Hilton Hotel, and Podium shopping complex)

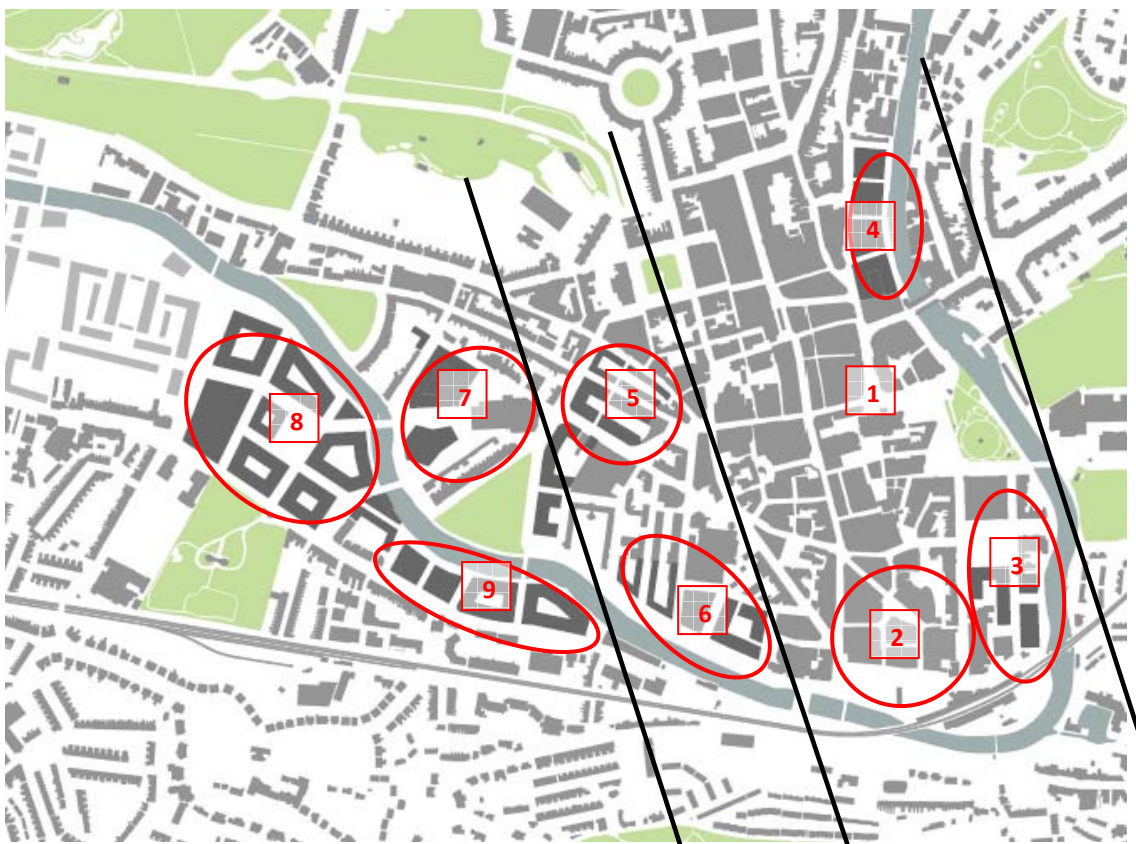
Fracture area

City Fringe

5. Kingsmead Knuckle (Rosewell Court / Kingsmead House / Plymouth House)
6. Bath Quays North (Avon Street Car and Coach Park and City College)

Beyond Charles Street

7. Green Park Station / Sainsbury's
8. Western Riverside East / Homebase
9. Bath Quays South



Bath Riverside East and
South Quays

'City
Fringe'
i.e. Edge
of Centre

City Centre

The City Centre

Historic Core

- 3.18 Limited opportunities for development. Change with focus on living heritage and public realm interventions.

Station Area

- 3.19 The construction of the new **Southgate** shopping area is progressing well and is on schedule to fully open in 2010. The associated refurbishment of the Bath Spa rail station and development of a modern bus terminus will establish public transport interchange and a more befitting gateway to the core of the World Heritage Site.
- 3.20 It is important to consider the potential relationship of Southgate to other urban renewal opportunities and consider whether any of these are more or less appropriate for longer term retail growth during the RSS period, should the forecast for additional floorspace be confirmed.
- 3.21 To the east of Southgate and bounded by the bend of the river lies the **Manvers Street** area which like Southgate benefits from close proximity to the rail and bus interchange. The main existing uses are public car parking, police station, Royal Mail sorting depot and some relatively modern office buildings that add little to the quality of the urban environment. The area benefits from a riverside location, though public access is very poor, and the river presents a threat as well as an opportunity given that part of the area falls within flood risk zones 2 and 3a. It is considered that this area lends itself to primarily office led redevelopment with retail frontage facing Manvers Street forming a secondary element alongside city centre living. Significant retail development in this location could make the existing north-south retail axis overly 'south-heavy', reinforcing what is considered to be a structural characteristic in need of better balance.
- 3.22 The Council understands that Avon and Somerset Constabulary are reviewing the extent and nature of their operational requirements in Bath which could lead to a rationalised physical presence at Manvers Street. Further, from a place making perspective it would be desirable to re-locate the Royal Mail sorting depot away from the core of the city. The scope for pursuing this option will depend on a number of factors including the extent to which the depot is dependent on a city centre location close to the rail network. There are therefore major issues to be resolved in order for this area to realise its full potential. The Council will continue to engage with the Police and Royal Mail to discuss their future needs.

North of Pulteney Bridge

- 3.23 Occupying a quadrant in the north of the city centre the **Hilton hotel and former cattle market** area is an obvious detractor from the World Heritage Site and forms an unfortunate backdrop to the world famous Pulteney Bridge. The adjoining **Podium Shopping Centre**, whilst fulfilling an important functional role, forms part of a composite monolithic structure that makes no contribution to its waterfront or townscape context.
- 3.24 Redevelopment at this location would enhance the appearance of the city centre. The Council considers that it would be desirable to broadly incorporate the existing mix of

uses whilst realising the opportunity to bolster the retail offer and supporting A3 space to increase active frontages as part of any programme to address the longer term need for additional retail space. The realisation of the potential of this area could widen the lateral reach of the dominant north-south retail axis and bring the outlying Walcot Street shopping strip psychologically closer to the core of the city centre.

The Fracture Area

- 3.25 Part of the central area is identified as a ‘fracture area’ or ‘shatter zone’: a fragmented environment that dislocates the core of the city centre from the Western Riverside Regeneration Area to the west. It is compromised of two parts:

Edge of Centre

Kingsmead ‘knuckle’

- 3.26 The Kingsmead ‘knuckle’ is a significant blockage to movement between the city centre and areas beyond. Existing uses include office space, affordable and market flats and a small amount of public car parking.
- 3.27 Much of the area was comprehensively redeveloped during the 1960s and 1970s partly as a necessary response to damage inflicted in World War II. Whilst the buildings house important functional activities their form and massing sits uncomfortably with special qualities of Bath’s urban fabric. Since the building of Rosewell Court (1960) the south western part of the central area has become physically and psychologically detached from the city centre proper – a state from which it has yet to recover. This was the first if not the worst of a cordon of constructions strung around the historic core. Kingsmead House followed (1964-65) alongside the City of Bath College (1957-63).
- 3.28 Bounded by James Street West and Great Charles Street, the adjoining Kingsmead Square achieves good level of pedestrian footfall and acts as an informal space for passive recreation and leisure. It benefits from close proximity to the recently constructed Odeon Cinema complex. This area is well located/positioned to contribute to longer term retail expansion and could engender a stronger east-west axis to complement the dominant existing north-south retail spine, particularly if it is determined that other central sites such as Manvers Street and Avon Street lend themselves to a more office led mixed use bias.

Bath Quays North Area

- 3.29 To the south of this area (designated as edge of centre) lies the multi-storey **Avon Street car park** and associated city centre **coach park**. The Council is considering the benefits and consequences of relocating coach parking to beyond the city whilst still enabling drop-off in the city centre or at park and ride sites. Adjacent the **City College** and its students enjoy a location just on the edge of the city centre. However, visually, this area presents an unfortunate view to people arriving to Bath by rail, a legacy of 1960s’ modernist development. Collectively this area is called **Bath Quays North**.
- 3.30 Solutions for enhancing this part of the city could be widened if the city college is considered as part of a broader Avon Street area urban renewal opportunity. The right type of mixed used redevelopment in this general area would be highly advantageous to

the city and could involve the alteration of traffic routes and improved pedestrian interconnections with the existing city centre, including Southgate. Although well related to the primary shopping area the Council sees this part of the fracture zone as a primarily office led opportunity, incorporating further educational use as a secondary element alongside supporting food and drink establishments. Complemented by the Manvers Street area the south of the city could be transformed into a **smart city office district**, providing a high volume of city centre workspace in an improved riverside environment. As at Manvers Street, significant retail development at Bath Quays North could make the already dominant retail axis increasingly 'south heavy' and reinforce what is considered to be an existing problem.

Beyond Charles Street to Green Park Station and Riverside East

- 3.31 **Green Park Station and Riverside East** are allocated for mixed use development in the existing Local Plan under Policy GDS.1/B1 'Bath Western Riverside'. This policy is supported by a high level master plan SPD which promotes the future role of this area as a civic and commercially focused 'city extension' which extends strong physical and visual links from the heart of the established city into the new Western Riverside area. Currently this location represents the second of two strategic stepping stones between the established city centre and Western Riverside (the first stepping stone being the city fringe area). This BWR East area is mostly out-of-centre in PPS6 terms.
- 3.32 A number of design principles form part of the SPD. Of particular note is the principle that the city extension will be "predominantly occupied by city wide land uses and facilities" i.e. retail, markets, culture and family leisure uses. Green Park Station, at the key point of transition between the city and the wider Western Riverside site, is a distinctive listed structure and a well-known landmark. It presents a ready made opportunity to create a visually appealing gateway.
- 3.33 However, the entrance to Green Park Station is within 300m of the nearest part of the existing defined city centre shopping zone but most of it on the "wrong" side of the busy A367 Charles Street, requiring pedestrians to wait for an average of 30 seconds for the programmed crossing phase. East of the crossing the walk from the city centre shopping area and along James Street West takes potential shoppers along a route not featuring many buildings of visual or retail related interest. On arrival at the edge of the defined city centre shopping area at the corner of James Street West/Avon Street pedestrians are presented with few visual clues about the presence of any significant nearby shopping frontages.
- 3.34 Given the growth requirements of the RSS and the fact that Bath's geographical features and urban characteristics will combine to push/squeeze new development from the centre westwards, it will be necessary for Green Park Station and Riverside East to play a role in supporting a new and reorganised city centre uses.
- 3.35 The retail strategy advocates part of this area becoming a retail node. The term 'node' suggests a level of activity not appropriate at this location. At best this area could be a secondary location for comparison goods (including perhaps imaginatively integrating floorspace bulky goods) and accommodate any development that cannot be located at city centre and city fringe locations and perhaps 'specialist retailing' a destination that draws people to it but that does not negatively impact on the primary shopping area.

- 3.36 The Primary Care Trust (PCT) has a walk-in health centre in this area. The Council will continue to engage with the PCT to determine whether this is the ideal location within the central area for this facility or whether another location is favoured.

Bath Quays South

- 3.37 The profile of this area has increased markedly during the past 18 month's times as a consequence of the proposed Dyson School of Design and Engineering on the former Stothert and Pitt site. The Dyson story encapsulates many of the problems that need to be resolved in the Central Area – reconciling the need for new development with socio-economic benefits whilst respecting immediate and wider heritage assets – all within the context of managing flood risk. The south bank of the River Avon does not present a realistic option for longer term retail expansion and is more appropriate for office uses. The south bank of the river Avon fall largely within flood zone 3a.
- 3.38 Development in this area may result in the displacement of existing industrial / vehicle sales / timber yard activity – for which there are no other available sites within Bath. Replacement provision would have to be in the urban extension or elsewhere in the district.

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