

Progress since 2011





a net loss of office floorspace of over 8,000m² - but the Plan is still on track to deliver 40,000m² by 2029

Context

The Core Strategy and Placemaking Plan set out the strategic policies to facilitate new development. Bath's outstanding historic built and natural environment, and its sensitive management, is a key component of the the City's identity, sense of place and future economic, environmental, health and social well-being.

Bath does not have sufficient land to accommodate all growth pressures in a way that is compatible with its built/historic environment quality, including its World Heritage Site designation. Capacity is further constrained by transport impacts. Therefore, in a city with competing pressures on space, priority is given to housing, employment space and environmental considerations, with approprate transport mitigation measures.

Spatial priorities for Bath

- Increase the provision of employment space by delivering the planned additional office floorspace and provide greater protection of existing office and industrial space.
- Facilitate the delivery of transport infrastructure improvements needed to encourage sustainable travel, tackle congestion, reduce emissions from traffic and improve journey time reliability.
- Manage and improve air quality in the City, specifically within the Air Quality Management Areas.
- Address parking issues arising from purpose built student accommodation (PBSA) and houses in multiple occupation (HMO).
- No planned provision for further hotel growth in the short-term and investigate managing the growth of short-term holiday lets.
- Be more directive about on-campus University

Key priorities include:

- Maintain and enhance natural, historic and built environmental assets and high quality, recognising statutory requirements.
- Maintain and emphasise the priority for delivering new housing (excluding student accommodation), especially affordable housing.

growth/PBSA and ensure PBSA meets student demand, to help address HMO pressure. Restrict off-campus growth.

- Consider a broader strategy for the City centre and local centres to enable flexibility to facilitate and encourage a range of uses.
- Maintain or provide appropriate social and environmental infrastructure to address existing deficiency and meet future requirements.



Strategy, evidence and policy review

The Local Plan Options document summarises the key changes since 2011 and updated evidence conclusions. This helps identify the key challenges and priorities that the new policies should address.

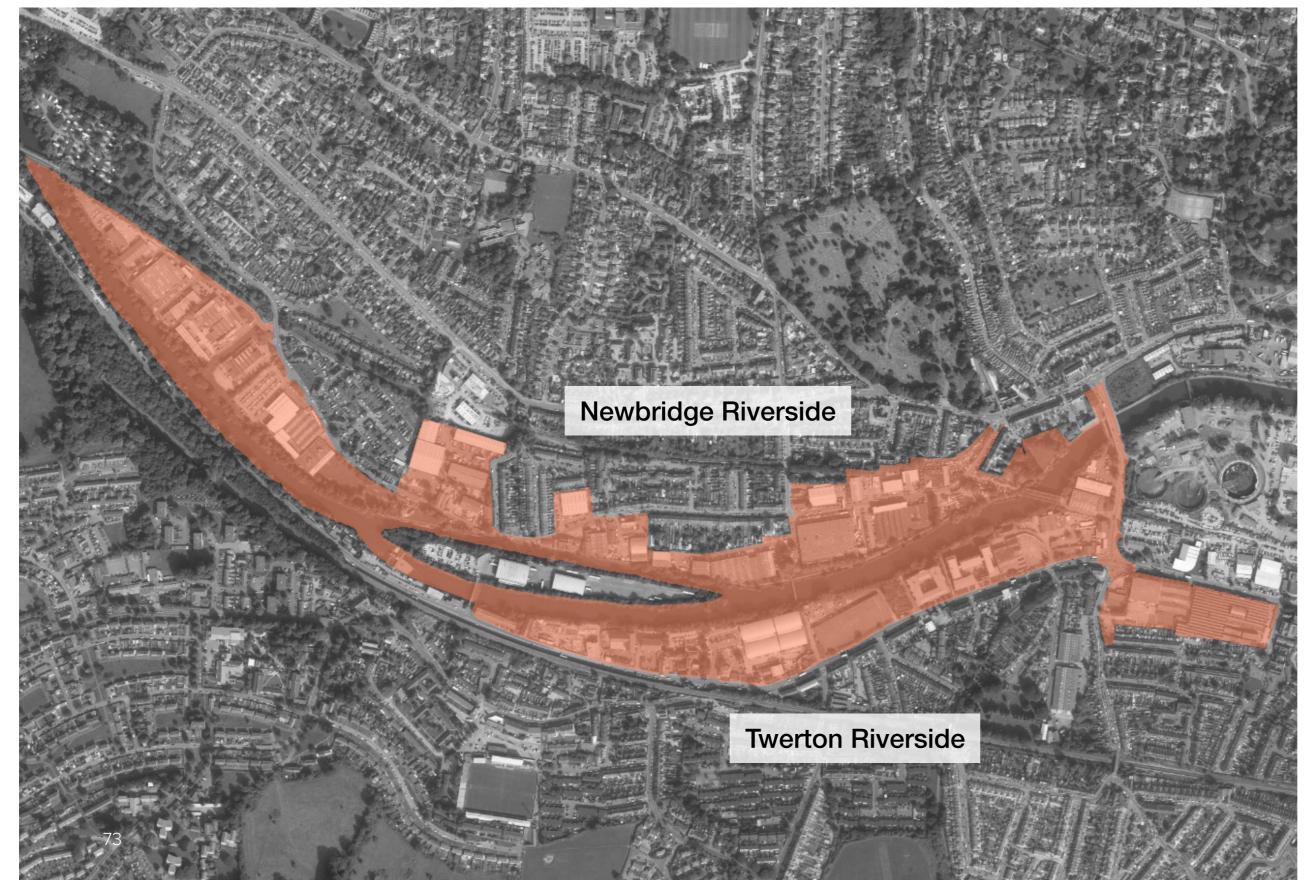
In summary, the current spatial strategy, which prioritises provision of general housing and employment space in the City and protects and enhances historic and natural environments, is still broadly appropriate but some elements of the policy framework need to be strengthened in order to secure strategy delivery.

Employment

Bath Enterprise Area has now been upgraded to an Enterprise Zone with the benefits of incentives and additional funding to facilitate business creation. The Plan is still on track to deliver net growth in office space of around 40,000m² by 2029 but industrial space is being lost at a faster rate than planned, largely due to the construction of student accommodation. There are limited opportunities to make further provision of employment land, therefore protecting both existing and committed office and industrial space in the City will be of high importance.

Therefore the Options document presents key topic areas that need to be reviewed.

Policy B3 identifies Newbridge Riverside as Bath's primary location for industrial uses. Twerton Riverside is not identified as a Strategic Industrial Estate and is indicated in Core Strategy Policy B3 as suitable for a broader range of uses, providing new business premises and housing. Recently much industrial land has been lost to purpose built student accommodation (PBSA), reducing the flexibility the Policy is intended to provide.



Policy approach options:

1. Amend Policy B3 for Twerton Riverside so that it more strongly protects the remaining industrial space for industrial uses. This would work in tandem with the proposed strengthening of Policy ED2B, which would put the onus on the applicant to justify why a site should not be retained for industrial use (see the proposed policy approach DM11).

2. Maintain current Policy B3

Twerton and Newbridge Riverside

approach but with specific reference to excluding development of PBSA, thereby providing greater flexibility to facilitate a mix of employment space and housing.

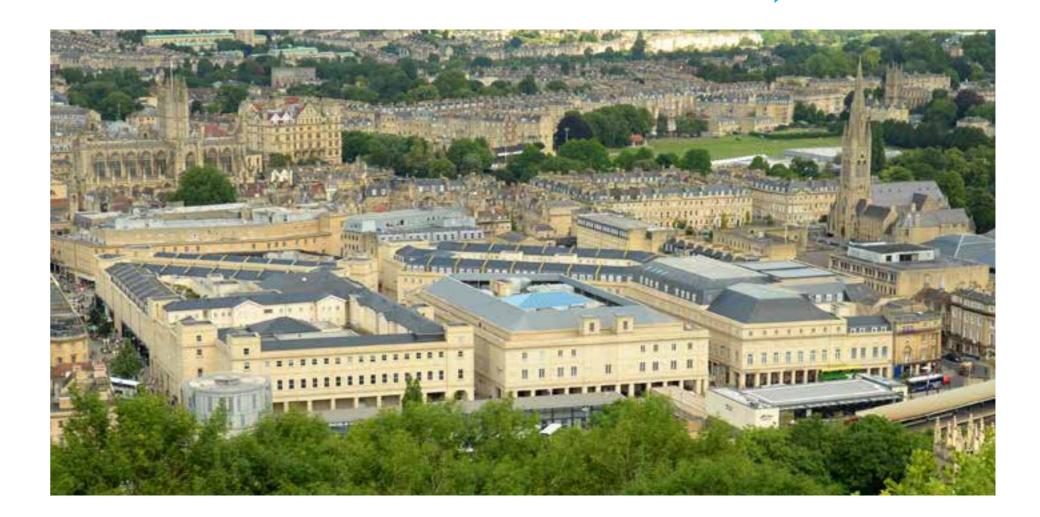


Housing

The Joint Spatial Plan proposes that around 300 more dwellings are provided through 'urban intensification' within Bath, in addition to the 6,424 new homes that are already built and currently committed in the Placemaking Plan and through planning permissions.

The Draft Local Plan will identify and allocate opportunities to provide an additional 300 dwellings in Bath, which might include:

- New brownfield sites (not already allocated).



Visitor accommodation

- Redevelopment or intensification of existing housing areas including surplus garage sites.
- Previously discounted sites.
- More intensive use of existing allocations.



Retail

The Retail Study 2018 indicates that the overall retail offer is good in Bath and the City remains an important shopping destination. It is considered that the existing policies provide an appropriate framework to facilitate retail development in the City. Within the context of recent hotel provision and more hotel bedrooms with existing planning permissions, it is not considered necessary to allocate any specific sites for further hotel development in the City. This approach would be reviewed as part of the five year review of the adopted Local Plan and in the context of updated evidence.

Recent growth in properties available as short-term holiday lets (both small and large, including party houses) has significant implications for the City such as on the availability of housing for residents, residential amenity and operation of other forms of visitor accommodation such as guest houses. There are currently limited ways to manage these short-term let properties as they lie outside the planning system. The Council will continue to monitor the situation and changes in national legislation.

Historic and natural enviornment

The Core Strategy and Placemaking Plan set out the strategic policies to ensure that development proposals respond appropriately to the context and local distinctiveness of the historic and natural environment. All of the existing policies and associated guidance remain appropriate and valid. However, there is an opportunity to review their promotion, presentation and interrelationships and consider how best to bring the different elements together within an adopted framework. The Council will also assess and identify gaps within the framework and opportunities to prepare further guidance as resources permit.

However, retaining existing shops and addressing vacancies are important priorities moving forward. Bath has more independent traders than comparable historic city centres and evidence suggests that the independent retail sector makes a significant contribution to the overall retail offer and attractiveness of Bath city centre.

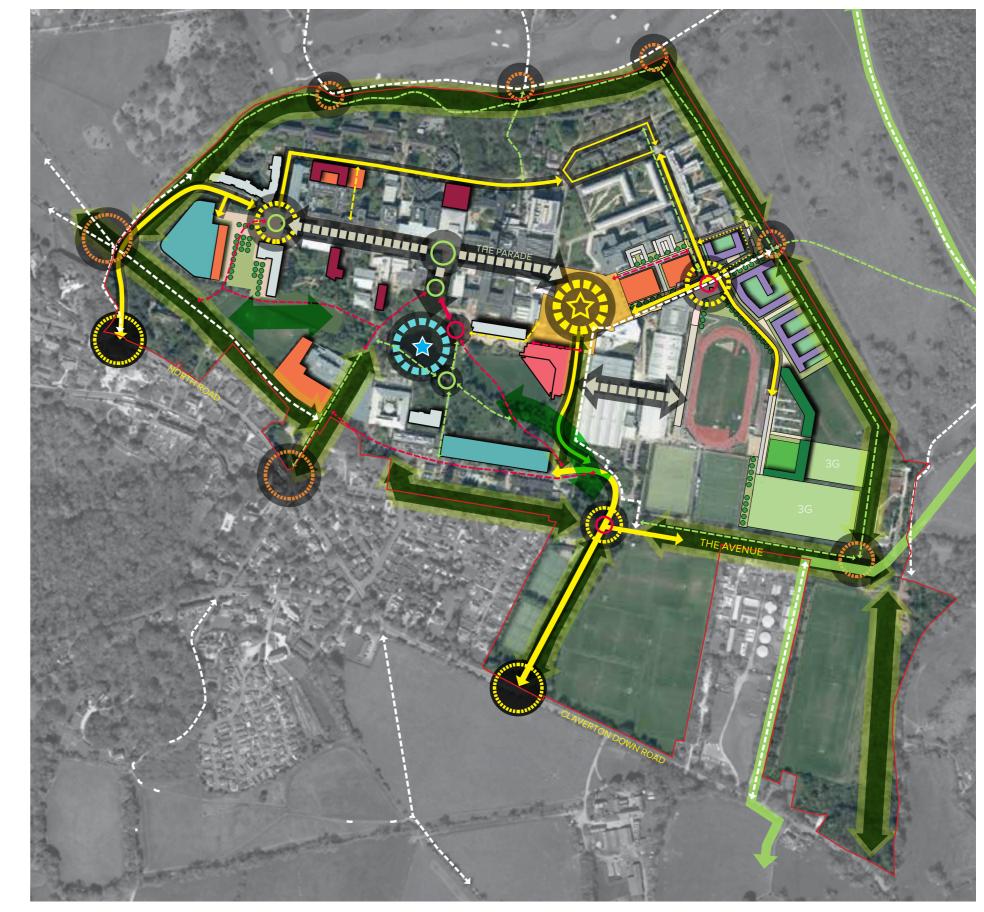


Bath's Universities

The University of Bath (UoB) and Bath Spa University (BSU) both play an important role in the economy and life of the City. Key challenges are to try to facilitate the universities' success while ensuring the delivery of planned economic and housing growth, within the context of environmental capacity.

The growth plans submitted by both universities show lower growth than previously forecast, reflecting national trends.

The UoB is preparing a new masterplan for the Claverton Campus, which is not endorsed by the Council at this stage. Subject to further evidence that environmental impacts (including on AONB) can be appropriately mitigated, there may be sufficient capacity on the Campus to accommodate forecast growth for academic space and student accommodation (rather than providing it elsewhere in the City).



BSU is also commencing work on a new masterplan. The campus is within the Green Belt and is subject to heritage and ecological issues, including being within the setting of the World Heritage Site and a registered Historic Park & Garden. In order to remove the campus from the Green Belt 'exceptional circumstances' would need to be demonstrated.

Proposed policy options:

Option 1: New student accommodation and academic space to be facilitated on campuses only.

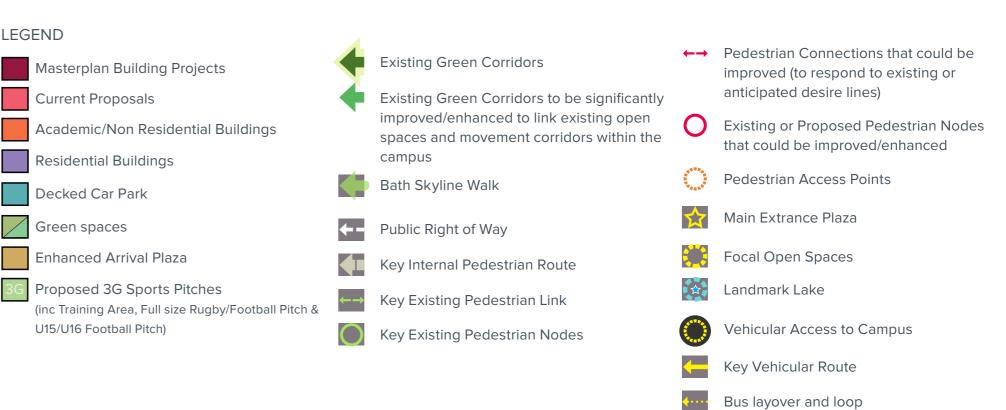
Option 2: New student accommodation to be accommodated on campuses only, but academic research space can be accommodated in the City.

Option 3: Focus new student accommodation and academic space on campus and only allow such development in the City and elsewhere where it does not harm the other objectives of the Local Plan, particularly the delivery of housing and employment.

Affordable student accommodation

Many recent purpose built student accommodation (PBSA) are studio type with rental values beyond the affordability of the majority of home students. The right types of PBSA, with appropriate rental values in the right locations, can address general affordability issues and help manage the demand for further houses in multiple occupation (HMO). HMO additional licensing is to be extended to the whole city in January 2019.

UoB Claverton Campus masterplan

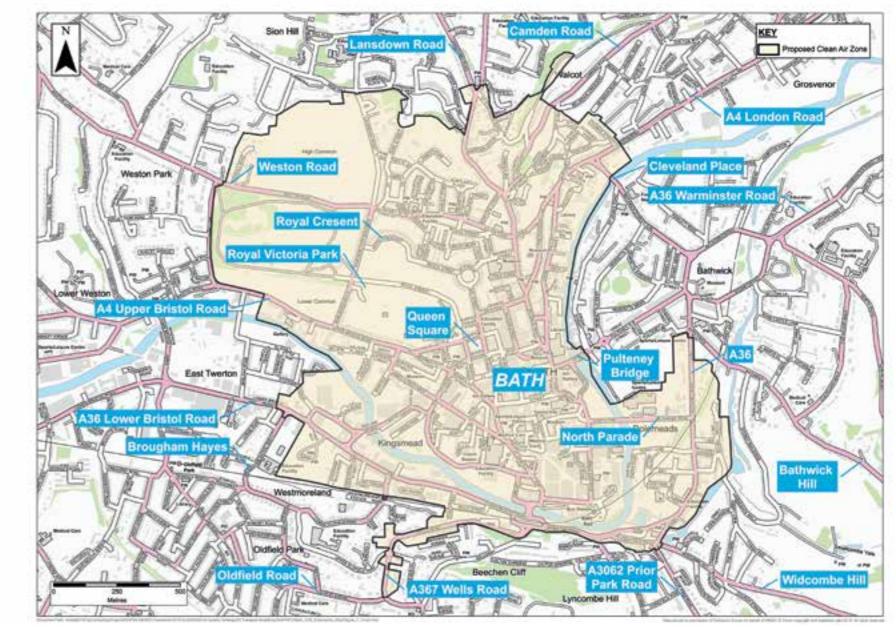


It is proposed to introduce a requirement that at least 35% of PBSA is provided for affordable rent - at a rental cost for the academic year equal to or below 55% of the maximum maintenance loan.



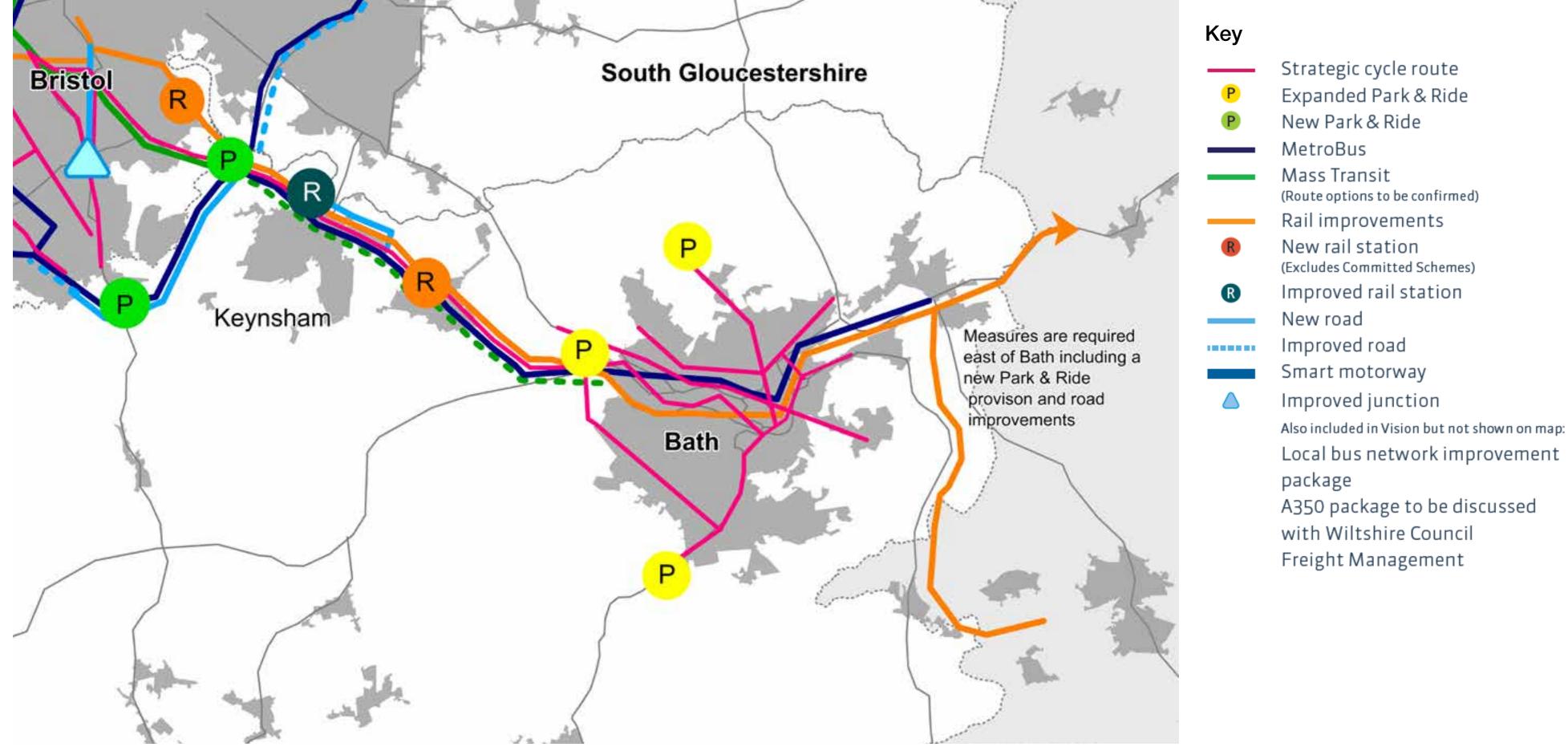
Transport in Bath

To make places more accessible and help create healthier environments for all, the Core Strategy and 'Getting Around Bath – A Transport Strategy for Bath' emphasise the need to reduce car dependency and promote sustainable modes of transport. This is also necessary to mitigate and manage the transport implications of accommodating additional economic growth and housing in the City, as well as improving air quality. The introduction of a Clean Air Zone and relevant mitigation measures should reduce the number of vehicles entering the City centre



of vehicles entering the City centre.

Clean Air Zone location plan



Wider transport improvements identified in the Joint Transport Study (2017)

Setting appropriate levels of parking forms an

Option 2: Identify and allocate specific land for Park

important policy control on the volume of traffic generated by new development in the City. Limiting the increase in vehicular trips into central Bath also requires increased and improved Park & Ride provision.

Proposed policy options:

Option 1: Maintain the current criteria-based policy and progress delivery of new Park & Ride development solely through submitting a planning application.

& Ride development (expansion of existing sites at Lansdown and Odd Down and new provision East of Bath) in the Local Plan. This is also likely to require removing land from the Green Belt, but only if 'exceptional circumstances' exist.

The transport improvements required for Bath sit within a wider context of improvements across the West of England. The wider improvements are shown in the Joint Transport Study (2017) as illustrated above.

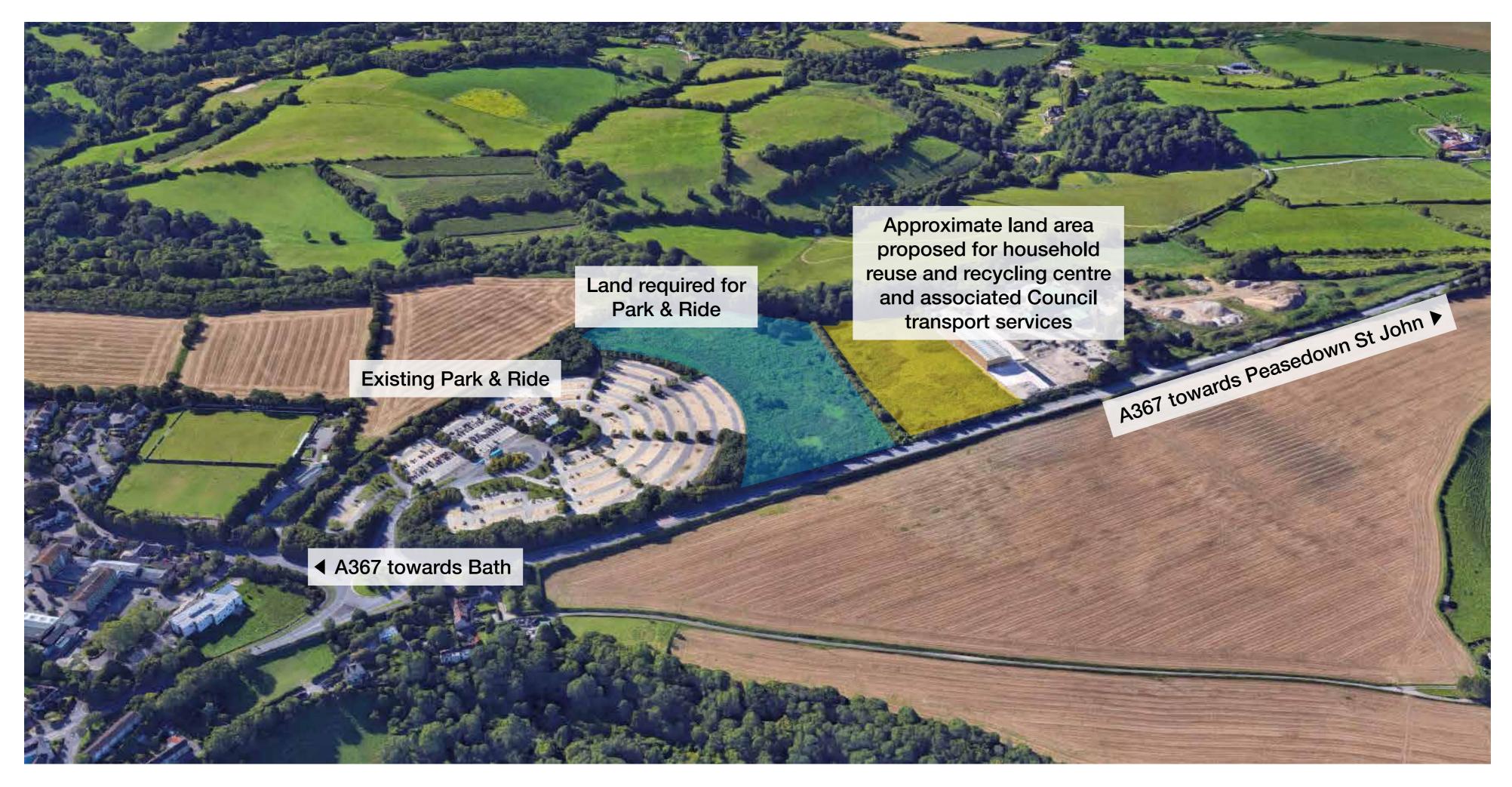


Replacement household reuse and recycling – for residents

The current household recycling centre at Midland Road is an outdated facility that needs replacing to provide modern fit-for-purpose facilities. The Council is investigating the potential to relocate the facility to land at Odd Down, to the south of the Park & Ride site.

The land lies within the Green Belt and further assessment of environmental and traffic impact is needed. Environmental impacts requiring further assessment include landscape impacts e.g. to the setting of the World Heritage Site and the Cotswolds AONB, as well as the need to ensure that it would not significantly harm bats roosting and foraging in the Bath & Bradford-on-Avon SAC. Subject to the results of this assessment and progression of the proposal through the planning process, it is anticipated that a new facility would be operational in 2021/22.

The location being considered is illustrated in the diagram below



Further work will be needed to address the issues above if the Council considers that it should seek to facilitate delivery of the facility through the Local Plan. Alternatively progressing the proposal through the planning system could be undertaken solely through submitting a planning application.

