Bath & North East Somerset Council

COUNCIL'S RESPONSE TO ID/3: MATTER 2 - OVERALL APPROACH

Issue 1: Whether the changes to the CS are necessary and appropriate having regard to policies contained in the Placemaking Plan and its purpose.

Policy B2 4(d) - Hotel bedrooms
(g) Does the increase in the number hotel rooms required present a material change to the strategy set out in the CS?

(h) Is the increase in the number of hotel bedrooms to be provided from 500-750 to 1000 justified?

1. The Core Strategy plans for the provision of increased hotel bedrooms (500-750) in order to ensure Bath remains competitive and attractive as a visitor destination and that a variety of accommodation is available catering for the requirements of different visitors. These bedrooms are focussed in central locations (in accordance with NPPF sequential approach). Increasing the planned number of bedrooms to 1,000 does not change this strategy and in fact is necessary to achieve this strategy based on the updated evidence.

2. The increased number of hotel bedrooms to be planned for is justified by the 2015 Bath Hotel Futures report (CD/PMP/B12) which updates the earlier 2009 Study. It provides a higher forecast for the future growth of hotel provision in Bath based on the growth in room night demand in the city between 2008 and 2015 and more optimistic national forecasts for growth in domestic and international tourism of between 3 – 6%.

3. Based on these projections and taking a pragmatic view on future growth levels for the city, based on low to medium growth levels, it is suggested that looking forward to 2029 provision should be made for 910 - 1240 new hotel bedrooms. Taking into account the 608 new bedrooms that have been delivered or are in the process of development since 2014 a further 300 – 630 bedrooms are required to be provided in the central Area. This information is set out in the table below:

ROOMS PROVIDED		
2014 – 2015	130	Delivered & pipeline.
2015 – 2026	478	
TOTAL	**608**	

TO BE FOUND		
L	M	H
300 – 360	**580 – 630**	**930**

4. The increase in the number of hotel bedrooms to be provided is justified on the basis of the evidence.

5. The Hotel Futures report indicates that much of the demand will be generated beyond 2020 and it is intended to revisit these figures as part of a review of the Plan and in the light of the publication of a refreshed Destination Management Plan for Bath.

Overall Strategy for Bath

(i) Is the proposed additional text to the CS set out in paragraphs 17 – 22 of Volume 2 of the B&NES Plan consistent with the strategic framework and strategy set out and examined in the adopted CS and SA that accompanied it? In particular, is the Council's decision "to plan to meet its housing numbers and employment floorspace in full, to strive towards meeting the projected growth in hotel demand, and acceptance that there will be a shortfall in meeting the retail capacity identified for the whole plan period and that the aspirations of the universities may not be realised" a change in approach to the CS spatial vision and strategy?

(j) If so, how?

Summary

6. The priority for meeting general housing and economic development needs within the Central Area and wider Enterprise Area was already established through the Core Strategy Policy B5 (CD/PMP/G6), which was found sound by the Inspector. The additional text refines and clarifies this position and is considered to be consistent with the general thrust of the strategic framework and strategy set out and examined in the adopted Core Strategy.

7. The Placemaking Plan, in light of the updated evidence base, provides further clarity about the tension between the availability of land and the demand for growth that is already highlighted in the Core Strategy. The additional text makes it clearer that the Council's priorities are to meet its housing numbers and employment floorspace in full, whilst explaining the approach towards other land uses.

8. Whilst the position in relation to purpose built student accommodation was made very clear in Policy B5 of the Core Strategy, as follows:

> 'Off-Campus Student Accommodation
> Proposals for off-campus student accommodation will be refused within the Central Area, the Enterprise Area and on MoD land where this would adversely affect the realisation of other aspects of the vision and spatial strategy for the city in relation to housing and economic development.

9. The position in relation to meeting the capacity for retail growth was different in the Core Strategy, as no retail comparison floorspace figures were provided. The general approach as expressed in Policy B1 was to 'ensure that the primary shopping area successfully absorbs Southgate into the trading patterns and character of the city centre by not making provision for a further large scale comparison retail project' (Policy B1, 6a) and also to 'enable small to medium sized comparison retail development that improves the shopping offer and enhances the reputation of the city centre' (Policy B1, 6b)

10. The Retail Study 2014 (CD/PMP/DM14 & DM15) identified the capacity for an additional 30,000 sqm of comparison floorspace by 2029. The Placemaking Plan Options document (CD/PMP/G8) tested a number of different spatial scenarios to accommodate the objectively assessed need. The approach taken in the Options document is explained more fully in the 'Rationale for Land Use Options within the Central Area and Enterprise Area' document (CD/PMP/B1).

11. The agreed approach taken in the Draft Placemaking Plan was to prioritise meeting the office floorspace requirements over meeting the projected retail capacity. This approach is explained in further detail below, and in the Council's Statement to Matter 6:

STRATEGY FOR BATH
Background

a. As part of the statutory planning framework, it is the role of the Placemaking Plan to reconcile conflicting objectives and competing land-uses in accordance with the NPPF and the Council's priorities via the Sustainability Appraisal. The locational strategy contained within the Placemaking Plan should be the most appropriate strategy, when considered against the reasonable alternatives, justified by the evidence.

b. Based on the evidence, Bath should accommodate the following **land use demands**:

1. around **60,000 – 70,000 m^2 gross of new office** floorspace.
2. approx. **30,000 m^2 of comparison retail** up until 2029.
3. around **7,000 dwellings** in Bath (Core Strategy), of which around **3,300 dwellings are** in the Enterprise Area.
4. between **931 and 1607 new hotel bedspaces** by 2030, probably within the Central Area.
5. **new student accommodation** arising from revised university expansion plans.

c. There is not enough land in the city to optimally meet all of these land use demands. This is because Bath is a small city with relatively few development sites, its outward expansion is constrained by Green Belt / other environmental considerations and development within the City must not be of a scale, nature or quality which would harm the World Heritage site. The Bath Building Heights Strategy, the City-wide Character Appraisal, and the Statement of Outstanding Universal Value of the World Heritage Site describe in some detail the importance of the visual homogeneity of the city, and particularly the general uniformity in building heights of the Georgian City. New development proposals will need to respond to this important context.

d. The Council therefore needed to prioritise which land uses are considered to be more important for the limited land available. In particular, those uses that should be in the City Centre, those that can be accommodated as part of the expanded Central Area and those that can be located in the wider city. Part of the city centre and Central Area are within the Bath City Riverside Enterprise Area (EA) which is part of the West of England City Deal agreed with

Government. The main focus in the EA is the delivery of economic and employment growth with up to 9,000 jobs planned to be delivered by 2030.

e. The extract below from Core Strategy shows the City Centre Boundary (solid line) and the expanded Central Area (hatched line). The Core Strategy proposes an extension to the City Centre to the south west to accommodate the growth of town centre uses. **Office and retail** uses are defined in the NPPF as 'town centre uses' and it is primarily between these two that the key choices need to be made.

f. The Core Strategy sets out the policy expectation that 50,000 sqm of new office floorpace would be developed within and adjoining the city centre over the period of the plan. This figure was based on the assumption that 10,000sqm of existing office accommodation (that which is least suitable for continued occupation) would be lost. However, due in particular to changes to Permitted Development rights, the rate of existing office accommodation that has been lost has been more than anticipated, and therefore the Council will need to ensure that the amount of new office floorspace that is delivered is increased. The Placemaking Plan proposes **40,000 sqm of net new office floorspace.** Occupiers are also location sensitive preferring centrally located sites with good transport links.

g. **Retail uses** are subject to sequential testing which steers them towards city centre locations. The GVA Retail Study concludes that Bath is one of the largest and most popular retail centres in the West of England, and the city centre has improved its national ranking, now ranked 19th in the UK, up from 22nd in 2011. The Study (CD/PMP/DM14 & DM15) indicates some capacity for additional comparison retail floorspace in the short term and more significant capacity in the medium / long term need (roughly equivalent in scale to Southgate by the end of the plan period).

h. **Residential uses** are less sensitive in terms of location, but it is important that these are accommodated within the wider City as far as possible and the Council has sought to ensure sufficient housing land is available to demonstrate a five year housing land supply and meet the overall requirement identified in the Core Strategy (see BNES/PMP/002/2).

i. The demand for **Student Accommodation** is significant and the Council's approach is set out in greater detail in (CD/PMP/B16). Given the priorities identified and agreed for the Enterprise Area there is limited capacity to accommodate additional student accommodation in the City centre, Central Area or Enterprise Area without harming the Council's priority objectives.

j. The Draft **Bath Hotel Futures** Study 2015 is indicating, that if the Council wants to facilitate the growth of the visitor economy, a capacity range, of between 931 to 1,607 additional bedspaces up to 2030 is needed dependent on low, medium or high growth. It is likely that these will need to be accommodated within or adjacent to the city centre. The Draft Placemaking Plan identifies the opportunity to develop a hotel on the Manvers Street and Sydenham Park sites, and the Mineral Water Hospital would be an attractive commercial opportunity for a new hotel. This strategy is likely to result in a slight under provision of supply due to the lack of available land and the competing uses that we need to plan for.

BALANCING ISSUES IN CITY CENTRE & CENTRAL AREA

k. There are a small number of key development sites in the city centre and central area which will be fundamental to delivering the aims of the Core Strategy and the economic growth aspirations for the Enterprise Area. These are:

- Bath Quays inc. Bath Quays North & Bath Quays South
- Manvers Street
- Cattlemarket
- South Bank
- Green Park Station
- Sydenham Park

l. **Bath Quays North** is the key site because it can come forward in the short / medium term and its size and location are pivotal to the overall spatial strategy. Both retail and office development are competing uses for this site and the quantum of development appropriate there is limited by building heights and massing.

m. The Placemaking Plan reflects the objectives of the B&NES Economic Strategy and the Enterprise Area that **Bath Quays North** should be the city's main focus for new office development, with only a relatively limited quantum of retailing. This is to enable delivery of substantial new office floorspace as a new centrally located business district in order to meet identified short term demand and to facilitate both the growth of the city's indigenous businesses and to attract inward investment. This is key to the Economic Strategy objective of changing the nature of employment in the City and to achieving Core Strategy policy requirements for the delivery of new office space. Key advantages are the deliverability of this proposal in light of the Council's interest in the site and the viability of this quantum of office space in this location.

n. In terms of retailing, and in response to the need to identify suitable sites for meeting the projected retail capacity, the Retail Study (CD/PMP/DM14 & DM15) identifies BQN as having the potential to extend the core retail area. However given the constraints on the quantum of development on this site, as set out in para 'l' above, the Council is prioritising office development in order to meet Economic and Core Strategy policy objectives as set out in para 'm'.

o. Within the city centre **Manvers Street** and the **Cattlemarket** have the potential to deliver some retail floorspace but not all of the projected capacity. Therefore, the assessed capacity for future retail floorspace will not be fully met in the city centre due to the limited number of alternative, suitable sites. It is proposed to allocate an element of the retail capacity on the sequentially less preferable **Sydenham Park** with suitable policy requirements to prevent this location becoming a competitor location with the City centre. For this reason the Council has adopted a cautious approach to both the quantum of retail development and in the nature of retailing at this location.

p. The Council is aware that the decision to not accommodate the projected capacity for additional retail floorspace, at this point in time, could potentially impact on the future vitality and viability of the city centre thereby affecting Bath's comparative attractive as a retail destination. However the city is still absorbing the impacts of the major new retail development at Southgate and, as with the provision of visitor accommodation, the projected demand is focussed towards the end of the plan period. It is therefore appropriate to re-visit this issue as part of a future review of the Plan.