

Bath & North East Somerset Placemaking Plan

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.

Rural economy

k) Does the deletion of paragraph 509 that relates to major existing developed sites within the Green Belt represent a shift in strategic policy?

1. The Council does not consider that deletion of paragraph 509 that relates to major existing developed sites within the Green Belt represents a shift in strategic policy. On the issue of MEDS the Core Strategy Inspector in his Report (CD/PMP/G26, para 240) recognised that:

Within the Green Belt, a number of MEDS are currently defined on the Proposals Map of the adopted local plan. These were defined in accordance with the advice in Planning Policy Guidance 2 Green Belts which was current at the time, but has been replaced by the Framework. The specific identification of MEDS is not referred to in the Framework. In the light of concerns I expressed in ID36 about the ambiguous references to MEDS in the Core Strategy, the Council has proposed changes as explained in BNES/47 (6.22-6.26 and BNES/51, 6.1). In the context of national policy, the Council will review in the Placemaking Plan whether MEDS should continue to be designated and, if so, the sites to be designated and their boundaries. Wording to make this clear is necessary for soundness (MMs 49 and 111).

2. MM111 introduced the following explanatory paragraph to the Core Strategy as paragraph 6.64A (MM49 related to Policy B5 Strategic Policy for Bath's Universities):

Within the Green Belt a number of Major Existing Developed Sites (MEDS) are currently defined on the Proposals Map. Within the MEDS, B&NES Local Plan Policy GB.3 allows for limited redevelopment or infill which does not harm the openness of the Green Belt or affect the purposes of including land within it. Within the context of national policy the Council will, through the Placemaking Plan, be reviewing whether MEDS should continue to be designated and, if so, the sites to be designated and their boundaries.

3. This paragraph (now 297 on page 123 in the Placemaking Plan) is proposed to be deleted as the Council has undertaken this review as outlined below. Paragraph 509 is proposed to be deleted for the same reason.

4. Consistent with PPG2, eleven sites were identified as MEDS under saved B&NES Local Plan Policy GB.3 (CD5/1, p.155) with a boundary defined on the Policies Map as listed below together with their respective development requirements. The identified sites are either those sites in current employment use where limited infilling/redevelopment could help to support economic activity or educational establishments where development may be necessary as part of on-going changes and improvements to education and to assist in securing social and economic benefits for the local community.

Site	Development requirements
Bath Spa University, Newton Park	Limited infilling and redevelopment for educational uses and student accommodation in line with Policy HG.17
Clutton Hill Farm, Clutton	Limited infilling for employment uses
Former Radford Retail Systems site, Chew Stoke	Redevelopment for mixed use in accordance with Policy GDS.1.
Prior Park College, Claverton Down:	Limited infilling and redevelopment for educational uses
Culverhay School, Rush Hill (now Bath Community Academy)	Limited infilling and redevelopment for educational uses
Portals site, Bathford Paper Mill, Bathford	Limited infilling and redevelopment for employment uses
Chew Valley School, Chew Stoke	Limited infilling and redevelopment for educational uses
Monkton Combe School, Monkton Combe	Limited infilling and redevelopment for educational uses
Ralph Allen School, Claverton Down	Limited infilling and redevelopment for educational uses
Burnett Business Park, Burnett	Limited infilling and redevelopment for employment uses on the western part of the site and limited infilling only for employment uses on the eastern part of the site
Oldfield School, Newbridge	Limited infilling and redevelopment for educational uses.

5. It is still Government policy to apply strict control to development in Green Belts. An exception to this relates to 'previously developed sites' for which the following is not inappropriate development (NPPF, para 89):

limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

6. This represents a change in direction from previous national policy in now applying to all 'previously developed sites' in the Green Belt rather than just to those previously defined by the local planning authority as Major Existing Developed Sites. There is also no longer a requirement to define a boundary within which development would be acceptable. The lack of a defined 'development boundary' would not prejudice any redevelopment or infilling of any of these sites providing the proposal complied with the terms of NPPF, para 89 and other policy considerations.
7. The deletion of paragraph 509 from the Core Strategy text merely responds to the change in national policy advice by deleting reference to MEDS and is not a change in strategic approach.

l) What contribution did the potential development of major existing developed sites within the Green Belt and identified in the local plan make on the strategy for meeting the economic needs of the area?

8. The majority of the sites identified as MEDS are currently in educational use. This is not apparent in paragraph 509 which may imply that the MEDS were only identified for business uses. In fact there were only three sites in employment uses (Clutton Hill Farm, Clutton, Portals site, Bathford Paper Mill, Bathford and Burnett Business Park, Burnett) and one mixed use site (Former Radford Retail Systems site, Chew Stoke) as the table included in the response to k) above indicates. The Radford Retail Systems site which as well as being designated as a MEDS was also allocated for redevelopment as a comprehensive mixed-use scheme including workshops for business use within Use Classes B1, B2 & B8 under saved Local Plan Policy GDS.1/V8. As this site has only been partially redeveloped it is proposed to continue to 'save' Policy GDS.1/V8 to ensure the remaining development of the site takes space in accordance with the site requirements (Volume 6, Table 2 on page 6 - CD/PMP/G1/6) which includes the employment element of the scheme.
8. The adopted B&NES Local Plan (CD5/1) recognised that at that time whilst industrial employment was forecast to continue to decline, industrial sites would continue to provide employment opportunities and that large sites within or adjoining villages made an important contribution to providing employment in rural areas. The Local Plan sought to safeguard these types of employment sites against their loss to another use within the context of saved Local Plan Policy ET.3. Although some former employment sites in more sustainable locations have been lost to housing (Paulton Printing Works) this has not had an adverse impact on the strategy for meeting the economic needs of the area. B&NES Local Plan Policy ET.3 is proposed to be replaced by policies protecting industrial estates/premises in the Placemaking

Plan (Policies ED2.A and ED2.B) that the Council considers are consistent with the NPPF.

9. The three employment 'MEDS' sites do not form part of the strategic or non-strategic industrial supply identified in the Industrial Market Review.¹ However, they do continue to make a minor contribution to meeting the economic needs of the area and through proposed Policy ED.2B existing business uses are protected and proposals for additional development in use classes B1c, B2 and B8 will be acceptable within the context of national Green Belt policy referred to above. As such the objectives of the policy framework provided through the NPPF (paragraph 89) and proposed Policy ED.2B are broadly comparable to those set out via the MEDS policy in the B&NES Local Plan. In any event due to the site constraints any expansion (infill) or future redevelopment of these sites for employment use will only make a relatively minor contribution to the District's economic needs. Please also see the Council's statement (BNES/PMP/002/30) responding to Matter 24 (Economic Development, Rural Areas).

¹ [Industrial Market Review](#) (CD/PMP/DM18)