

BANES PLACEMAKING PLAN EXAMINATION

RESPONSE TO INSPECTORS MATTERS AND ISSUES (ID/3 – REV 1)

UPDATE TO STATEMENTS ON MATTERS 2 (OVERALL APPROACH) AND 11 (BATH HOUSING)

ON BEHALF OF RADSTOCK LLP (PARTICIPANT ID: 6414)

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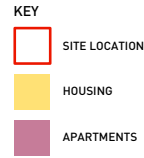
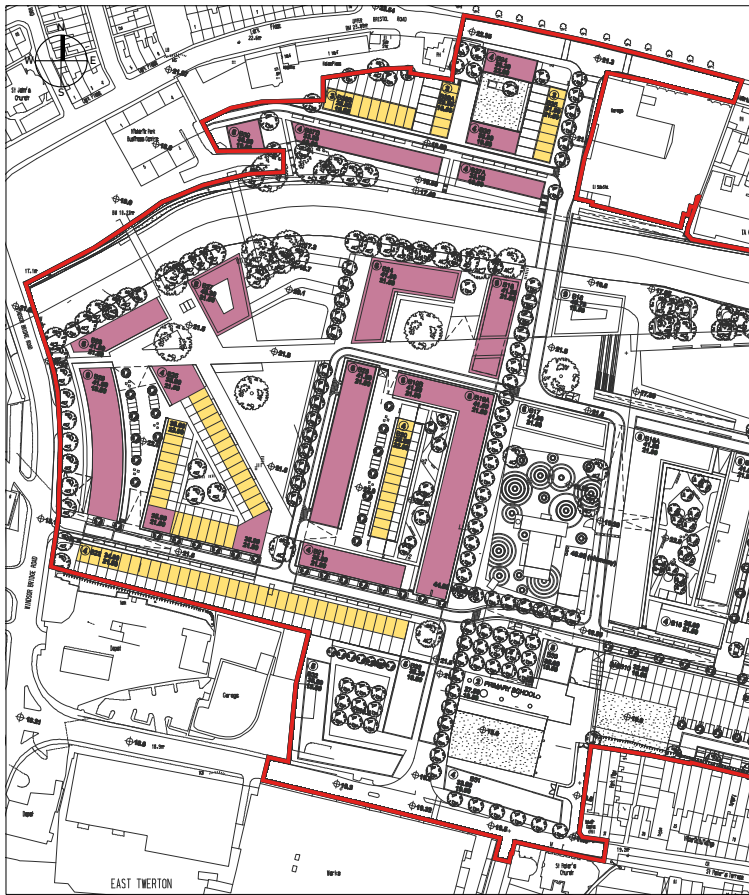
PLANNING | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

UPDATE TO STATEMENTS ON MATTERS 2 (OVERALL APPROACH) AND 11 (BATH HOUSING)

1. In our Statements we question the developable capacity of the residual area of Western Riverside within the plan period and argue that it cannot be relied upon to deliver more than 805 units based on applying the typology of development on the land that has been developed or is under construction to the east. This document updates and largely verifies that position based on further analysis.
2. The attached plan shows the master plan accompanying the outline planning application for Bath Western Riverside. This has regularly appeared in design and access statements for reserved matters applications
3. Each building has a reference number e.g. B24, and a figure in a circle indicating storey heights. Absolute AOD heights are also shown. The buildings in the residual development area, are highlighted, but do not include those buildings to the very south which are earmarked for a primary school and student accommodation. This southerly area is not regarded as being developable in the plan period in the Council's April 2016 Housing Land Supply Report.
4. The developable capacity of the residual area of this site is contested in the Statements for Matters 2 and 11.
5. No schedule of accommodation as ever been published for the highlighted buildings.
6. We have measured footprints and storey heights to attain floor space figures and have also counted the number of houses.
 - a) There is 79,330 sqm GIA of residential floor space.
 - b) Of this 20,374 sqm GIA relates to 101 houses.

- c) The residual flatted floors space is 58,956 sqm GIA
- d) Applying an average figure of 80 sm GIA per flatted dwelling, as we understand is the Council's approach to determining numbers, results in 737 flatted units.
- e) In total the highlighted buildings will generate 838 flats and houses.
- f) Of these units, 24 houses and 9,853 sqm GIA of flatted space (123 units) are enabled by the master plan to the north of the river, backing up our statement that not more than 150 can be expected.
- g) That leaves 688 units in the highlighted buildings to the south of the river – which is of the same order of magnitude as the estimate in the Statements of 650 dwellings at 130 dph.
- h) Added to the 785 committed dwellings to the east, 838 additional dwellings on the residual land will yield 1,623 units overall.
- i) This must be seen in the context of an outline application for up to 2,281 that was used as the basis for plan-making during the Core Strategy examination and the Council's now claimed capacity of 2,000 – of which 1,760 are said to be developable to 2029.
- j) As a result of this additional analysis, the absolute capacity of the whole site is 1,623 and there remains a gap in plan period developable capacity of 133 between our position and the Council's. The Council's housing trajectory shows a residual figure of 971. We contended in our statement that this should be 805 but now update that to 838.
- k) However, up to this point we have not factored in the need to relocate the primary school within the masterplan and contend that this would require at least 0.5 hectares. Assuming this displaces some of the land for housing to the south of the river (master planned at average density of

138 dph) this would 'cost' 69 dwellings, increasing the gap between the parties to around 200. This is in line with our Statements.



BUILT FOOTPRINTSCHEDULE				
BLOCKS	HOUSES	FOOTPRINT (SQM)	STOREY	TOTAL FLOOR SPACE (SQM)
B19A/B	-	2272	6	14232
B20	13	595	4	2380
B21	-	726	4	2912
B22	33	1640	4	7368
B23	-	1496	6	2912
B24	-	1316	6	7896
B25	-	570	4	3450
B25	31	1479	4	5716
B27	-	779	8	6232
B28	-	624	6	3744
B29	-	1362	6	8172
B34	-	357	4	1428
B35	8	407	3	1221
B36	-	357	4	1428
B37A	-	474	4	1896
B37B	-	826	4	3304
B38A	6	300	3	900
B38B	10	399	3	1797
B39	-	270	5	1350
	101			79330

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BATH WESTERN RIVERSIDE - FOOTPRINT PLAN