

**BANES PLACEMAKING PLAN EXAMINATION
RESPONSE TO INSPECTORS MATTERS AND ISSUES
(ID/3 – REV 1)**

MATTER 11: HOUSING IN BATH

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1. MATTER 11 – Housing in Bath

Issue 1 – Whether the policies contained in the Placemaking Plan would enable the development of 7,020 dwellings in Bath

Q1 – Will sufficient housing be provided through the site allocations and development management policies to ensure the provision of 7,020 dwellings during the plan period

- 1.1 The purpose of the PMP is to give additional effect to the strategic delivery policies within the CS that serve to bring forward the overall strategy as set out in Policy DW.1. It is clear, on the Council's own evidence that the delivery policies of the CS and the PMP will not combine to enable the delivery of 7,020 homes for Bath. The April 2016 housing trajectory now only identifies a potential supply through completions permissions, allocations and windfall of 6,612. This is a shortfall of 408. There is no compensatory supply that has been identified to offset the Bath deficit. Consequently, the strategy for determining Housing Development Boundaries across BANES as a whole is not positively prepared, justified and consistent with national policy.
- 1.2 We highlight our position as presented for Matter 2, and do not repeat all of it here.
- 1.3 Since the Core Strategy was adopted a number of brownfield sites have fallen away as being relied upon for housing development for example Twerton Park (-150), and the southern parcel to be disposed of within the Royal United Hospital Estate (50). Although Twerton Park is allocated for development crucially, it is not relied upon for additional housing in the trajectory. Positive changes have not offset these negative changes.
- 1.4 In addition to the Council's own acknowledged shortfall, we have a number of additional concerns relating to the following sources of supply in Bath that are summarised below and are addressed in detail from paragraph 2.17
 - a) The realistic developable capacity within the plan period of the residual land at Western Riverside, Bath is at least **200** fewer than set out in the Council's April 2016 trajectory.
 - b) The lack of any 'loss' figures for 2011-12 and 2012-13 in the housing trajectory for Bath in respect of the conversion of HMOs from normal dwellings to HMO dwellings for students and an under allowance for future changes generates an additional shortfall of **185**

- c) Development issues in respect of some sites the housing trajectory (as set out in our Matter 2 Statement)
- Manvers Street (Bath) **-60**
 - South Bank (Bath) **-100**
 - Sydenham Park Bath **-250** (of 500)
- 1.5 Our assessment is that these factors increase the acknowledged shortfall of 408 by a further 795 dwellings meaning that the Plan can only realistically positively enable 5,817 dwellings at Bath.
- 1.6 We also note that the Westmark site at Windsor Bridge Road (112) is said not be available or housing development by the landowner, which generates an additional potential shortfall.
- 1.7 Bath is of course uniquely constrained and any meaningful housing land supply response would have to involve not only additional Green Belt land, but highly sensitive Green Belt land (from a wide variety of perspectives). We defer to the Council and the Core Strategy examination to set out its resistance to a further large green belt release at Bath.
- 1.8 With this new housing land supply position ‘in-play’ the LPA should be tasked to draft amendments to the Plan to identify specific sites, amendments to the proposed changes to HDBs and/or additional positively framed policy wording to allow housing outside HDBs.
- 1.9 Any argument by the LPA that the acknowledged or additional shortfall can be ‘kicked down the road’ and dealt with as part of a full Local Plan Review should be denied. This is because the Council is in a Local Plan Review situation now – albeit one that is not looking at the time horizon of the plan or overall requirements. Although termed as Part 2 of the Local Plan the PMP is a review of the deliverability of the Development Plan and attempts to ‘complete’ the Development Plan. There is no Part 3 planned and thus it falls on Part 2 to complete the job. The Development Plan should not be left incomplete after two stages of plan preparation. The LPA is in the precise policy making space that has the purpose of focusing on delivering the overall requirement. The Development Plan as a whole is being reviewed to ensure that its headline requirements are being positively planned for.

Safeguarded land at Keynsham

- 1.1 Accordingly, based on the analysis set out, the proposed Housing Development Boundaries are not positively prepared, justified and consistent with national policy. Additional allocations and amendments are needed, or greater flexibility in respect development outside HDBs at sustainable locations is needed.
- 1.2 We consider that the safeguard land at Keynsham to be a 'red-herring' on current evidence in respect of 'part' plugging the gap in supply. On the Councils own evidence, this land is not deliverable in addition to the allocated land at East Keynsham as the highways impact would be 'severe'. Only when there is evidence of a feasible solution and funded programme of works to address the issues can the safeguarded land come forward.

Additional Shortfall

Western Riverside, Bath

- 1.3 The non-inclusion of any land form Western Riverside in years 4 and 5 of the current 5-year land supply period is a sure sign that the longer term delivery of this allocation is in trouble. The developable capacity for the site for the plan period that was presented during the Core Strategy hearings was 2,281 and this was unchallenged/untested as it represented the upper limit of an outline consent for the site. However, the capacity in the latest (April 2016) trajectory is now 2,000, of which only 1,760 are now said to be developable by 2029. That is 521 less than originally claimed. No detailed masterplan was ever tested at outline planning stage showing 2,281 units.
- 1.4 Of the 2,000 in the trajectory, the housing land supply report identifies a high degree of certainty for 785 dwellings previously and currently being built by Crest, on an area of 6 hectares and at a density of 130 dph (yet achieving a mix of housing types and 6+ stories (in a World Heritage Site). We have no issue with this but note the density, layout and the apparent lack of potential to exceed this development/density typology on the residual allocation.
- 1.5 Against the currently claimed overall capacity of 2,000 the residual is 1,215. The land supply to deliver that residual is formed of two broad areas. There is 5 hectares to the west of Crest's current phase and an additional 1ha to the north of the river Avon on the Midland Road waste transfer station.

- 1.6 Taking the later area first, it is contended that the Council will not argue that this can realistically deliver more than 150 units, due to the SPDs parameters for this area. Once added to 785 this generates 935.
- 1.7 In order for the remaining 5ha of residual land to be developed so as to enable 2,000 dwellings overall, the density would have to be 203 dph. We see no evidence that this is achievable based on the consented masterplan. At 130 dph the residual area would yield 655 dwellings. Added to 935 this generates 1590, not 2000 overall, nor 1,750 within the plan period. There is therefore an overall gap of 410 between our analysis and the Council's capacity, and a gap of 170 between us in terms of developable supply in the plan period.
- 1.8 Up to this point we have not made mention of the issue raised in the Council's April 2016 Housing Land Supply Report of the need to re-design the residual land to incorporate the need for a primary school, the original anticipated site for which is not available due to arrangement of leases until after the plan period. We contend that the arrangement of leases makes CPO unrealistic. If the residual allocation also has to deliver a school, then its capacity will fall further so that the plan period gap will increase to over 200 dwellings (at least).
- 1.9 Finally, the lack of an alternative allocation for the Midland Waste Depot within the Placemaking Plan is conspicuous by its absence, suggesting that there is uncertainty as to whether the Council actually intends to vacate the site. This would create uncertainty in respect of further 150 dwellings.

Other Site Specific Matters

<p>Manvers Street (Bath)</p>	<p>-60</p>	<p>The University of Bath has recently taken over ownership the Police Station as administrative office space and there is no evidence whatsoever of an alternative feasible and viable site for the Royal Mail sorting depot, which has very specific requirements, and in Bath a central location. The site cannot be relied upon for mixed used redevelopment and 60 dwellings. The Place making Plan offers no enabling</p>
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		relocation strategy for the Royal Mail depot.
South Bank (Bath)	-100	Previously the LPAs approach was to allocate the site and prepare site requirement in case it became available, but it acknowledged that it was unwise to rely on it coming forward. It was not relied upon at adoption of the CS in the trajectory accompanying adoption. Now it relies upon its development, yet circumstances have not changed in respect of landowner intent.
Sydenahm Park Bath	-250 (of 500)	<p>The Council has changed its strategy for this area from one of city centre expansion (as set out in the CS) to one of housing-led redevelopment. It is now an eastwards extension of the Western riverside allocation. The anticipated capacity has increased from 300 (See 2014 trajectory) to 500. It is in multiple ownerships (as confirmed by diagram 11 of the PMP), which is not an insurmountable obstacle, but crucially, part of the ownership relates to Sainsbury's 'split' car parking (albeit immediately adjoining Homebase). This is needed operationally for Sainsbury's and in the absence of any strategy for its relocation within the area, is unlikely to be developable.</p> <p>The Homebase lease runs out in 2021 and the site is therefore available from this time, albeit the CS seek to reintegrate such town centre uses within town centre redevelopment. The PMP policy for this area risks running roughshod over CS Policy B2:h re the 'cleansing' of commercial/retail uses for housing. The significance this is</p>

		<p>accentuated as the Council is not planning to meet its full retail needs.</p> <p>The is scant design based evidence to show how 500 dwellings would be delivered on the entire area, nor what the capacity of just the British land (Homebase Area would be). Building height will have to respond to a number if issues, not least the scale of the 26 new townhouses built on the river frontage and the scale of Norfolk Crescent to the north of the river</p> <p>Further, it is not at all clear than the yellow land in diagram 11 is developable. It is in active use.</p>
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