

**Rationale for Land Use Options within the Central  
Area and Enterprise Area (November 2014)**

**Accompanies the  
BANES Placemaking Plan Options consultation  
(Nov 2014 - Jan 2015)**

# Rationale for Land Use Options within the Central Area and Enterprise Area

## Introduction

- i. The Core Strategy sets the strategic context for the allocation of sites within the Central Area and Enterprise Area. In combination the site allocations policies need to ‘add-up’, in conjunction with projects built or committed since 2011, to deliver the Core Strategy e.g. in relation to office, retail and leisure space. These sites can also contribute to the achievement of 7,000 dwellings for the city. A collection of future development sites have been identified to achieve this. The level of certainty about their availability in time varies. Some are more immediate prospects; others may be developable later in the plan period. BANES Council owns many of the sites in question and can therefore exert considerable influence.
- ii. Land use options for each site are presented to explore spatial strategies for allocating sites within the Central Area & Enterprise Area for mixed-use development to deliver the headline land use objectives of the Core Strategy. The options are presented for consultation to illustrate the reasonable spectrum of possibilities and to invite debate.
- iii. There is no expectation at this stage that any one of the three options, as currently constructed will translate directly to a chosen approach within the Draft Placemaking Plan. Indeed, the preferred option that emerges through consultation may be an amalgam or fusion of the options presented here.
- iv. The chosen way forward may also reflect as yet unknown additional issues raised in the consultation. For example, representations may be made by landowners/developers and other agencies that that will affect the chosen way forward including inter alia deliverability, viability, buildings heights, highways impacts and parking requirements. There may well be other possibilities or refinements in term of land use mix and/or the capacity of sites. The consultation should be seen as an opportunity for all interested parties to generate site specific options for consideration in the preparation the Draft Plan.
- v. The chosen approach that will be published for statutory consultation in the Draft Plan in 2015 should not emerge as a surprise following the Options consultation. The Options consultation seeks to ‘set-up’ the chosen approach and cover the range of

alternatives that can reasonably be considered. These will be tested for their significant sustainability effects.

vi. To keep the consultation manageable three spatial strategies governing the allocation of uses to sites with thin Central Area and elsewhere in the Enterprise Area are presented. Although the Options consultation will be time bound, participation will continue well in 2015 as part of an iterative process of policy development with statutory consultees, stakeholders, interest groups, developers and landowners.

vii. The three Options can be characterised thus:

**Option 1** is an indicative interpretation of the Enterprise Area masterplan. The most central sites are prioritised for the delivery of about 50,000 sqm GIA of office space. There is consequently a very limited additional retailing role on these sites. Retail is instead directed to a new ‘destination’ created within Green Park West & the proposed ‘Sydenham Park’. This concept assumes the future re-location of Sainsbury’s within Sydenham Park.

**In Option 2** the growth in retailing floorspace (25,000 sqm GIA) is instead focussed on the sites that lie closest to the primary shopping area. About two thirds of the office floorspace allocated in Option 1 on the affected sites is redirected to more peripheral areas e.g. Sydenham Park. Sainsbury’s remains in situ in Option 2 with major implications for the future role of the immediate area around Green Park Station.

**Option 3** is an intermediary concept delivering a more even split of retail and office across the most central sites. As in Option 2 Sainsbury’s remains in situ. Only about 40% of the evidenced need for additional retail space is planned for. This option also introduces additional sites not considered in 2 and 3. The consultation will determine whether any of the additional sites are realistic allocations or whether further sites should be considered.

There is of course an **Option 4**, a ‘no-nothing’ approach.. Having no policy does not mean, no development, as planning applications would still come forward. It simply means that there would be less guidance / control of development.

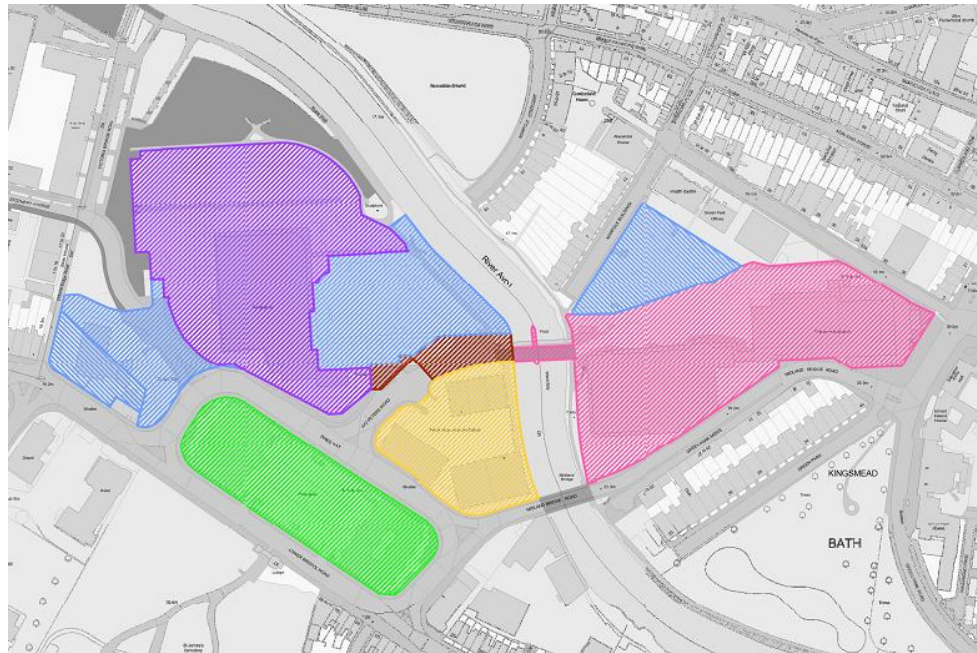
- viii. Within each option there is a 'base' overall floorspace assumption and in some cases a 15-20% lower capacity assumption. The lower figure is in lieu of full and proper sensitivity testing that still needs to take place in respect of the base figure e.g. in respect of heritage and associated building height matters. This testing may reveal that the base figure is reasonable or that a lower figure is more appropriate. There may be some sites where further work indicates that a higher capacity is achievable than is currently set out. Evidencing a reasonable capacity for each site (in partnership with Historic England et al) will continue up to the publication of the Draft Plan.
- ix. As part of the preparation of the Placemaking Plan the Council is considering whether to purchase an industry standard, topographically and height accurate 3D model of the city and its buildings. This will aid the testing of site capacities by establishing reasonable height scale and massing parameters for policy making. Indicative site concept models illustrating how the identified floorspace capacity can be prepared and 'dropped' into this accurate urban model for urban design testing. Such a process can show how the options for a site might be perceived from immediate to long distance views. If progressed, such visualisations will not be available at the start of this informal consultation period but there is an aspiration to make them available at the beginning of the new year to aid consultation responses, and on-going engagement re policymaking. Such models are regularly used by architects/planning consultancies on behalf of clients planning applications and are a useful tool.
- x. The specific 'numbers' indicated in this paper (taken from the accompanying data table) may not translate directly into actual planning policy within the Draft Placemaking Plan. This might result in a Plan that is too prescriptive. A choice needs to be made in respect to of the balance between dictat and discretion in the final policy wording. The land use mix 'numbers', if translated into Policy requirements may ultimately only be indicative (within reasonable 'tolerances') meaning that that would be some room for slightly different packages of policy compliant planning applications to come forward on each site.
- xi. However, the use of the indicative numbers in this document usefully illustrates the quantitative vision for each site within a coherent spatial strategy for meeting objectively assessed needs for a range of uses

## Option 1a - Reflects the Enterprise Area Masterplan and assumes Sainsbury's, Green Park Station relocates to the west

1. This option is a quantitative interpretation of the Council's master plan vision for the Bath City Riverside Enterprise Area.
2. The emphasis is on maximising the amount of office space that would be directed to the most central and best connected locations in the Central Area. 'Best-connected' means those areas that are in close proximity to the public transport interchange. This does not mean that all of the potential floorspace on these sites will be allocated for office use, but this would typically be the primary focus for the sites.
3. The umbrella term 'office' is used to include variety of specifications for different markets (e.g. grade A, grade B, innovation space and 'creative' space that is not really a conventional office, yet falls within the scope of the B1a use class). It will be for the market to decide which specification is suited to which site. The Placemaking Plan can offer a local authority view on this but it cannot be binding as the LPA cannot exert such controls.
4. Option 1 creates a new city centre business district focused on **North Quays, South Quays and Manvers Street**. The **Cattlemarket** is also earmarked, in part for an office role. In aggregate this Option allocates about 50,000 sqm GIA of office space to these three sites, ultimately enabling a net change of just over 40,000 sqm once identified losses within the city centre are taken into account. Such losses include the demolition of Kingsmead House. This is the gross and net additional floorspace that is required by Policy B1 and B2 of the Core Strategy.
5. However, this is not the complete picture with regards to office space due to additional space proposed for elsewhere in the Enterprise Area and other losses that will occur through permitted development rights (for which an 'estimate' of 10,000 sqm over 18 year is made).
6. After 'reserving' floorspace or office uses on the sites listed in paragraph 4, the remaining floorspace capacity that is available on these sites is allocated for:

- A hotel on both Manvers Street and North Quays (400 bedrooms in total). Added to current commitments this would enable the upper end of the forecast set out in Policy B2 of the Core Strategy of 500-750 (it will actually exceed it by 120).
  - About 5,000 sqm of A3 food and drink. To set that in context, ‘The Vaults’ at Brunel Square is 2,300 sqm. In thinking about the incorporation of additional A3 space the Plan must consider the benefits of such uses from a Placemaking perspective against the risks of saturation, vacancy and the negative image that this creates.
  - Residential flats/apartment’s (200 units).
  - There is a minimal ‘high street’ retailing role for the above mentioned sites in Option 1. It relates solely to the frontage of the Cattlemarket site.
7. Parking is assumed to be within a basement level (not undercroft) at Manvers Street and North Quays. There is no basement parking provision supposed at South Quays.
  8. The Enterprise Area vision document also identifies ‘workspace’ role for the **South Bank** and to reflect this, Option 1 allocates 16,000 sqm of office space alongside smaller amounts of residential and A3. This area is considered to represent a longer term opportunity and one that would not be relied on as being deliverable during the Core Strategy period. There is a slight mismatch between the Core Strategy period (2011-29) and the timeframe that the Enterprise Area masterplan is looking at (2010-2031). If this area was to be allocated for office uses now the rationale would be that it provided flexibility in the plan to respond to greater than anticipated demand and/or provided choice and competition in the market for office development.
  9. The Enterprise Area masterplan is aspirational about the future of Bath Western Riverside (East). It labels this area simply as the **Green Park Station** area. The Placemaking Plan uses the terms **Green Park Station West** (Sainsbury’s et al) and the historically authentic ‘**Sydenham Park**’ (Homebase et al). This area is in multiple ownership.

### *Land ownership and leases within BWR East*



**Purple:** Freehold, British land. Leased to Home Retail Group until 2021

**Blue:** Freehold, Sainsbury's. Occupied as petrol station and parking

**Yellow:** Freehold, Frank Shannon. Leased to Sainsbury's

**Pink:** Freehold, BANES Council. Leased to Sainsbury's

**Green:** Freehold, Ediston

10. The thrust of Option 1 is that it supposes that Sainsbury's relocates from its existing site to Green Park West where it would occupy a larger replacement store alongside a replacement Homebase store. The Sainsbury's store would probably have to be significantly larger in order for them to have an incentive to invest in a replacement and this would likely result in the introduction of a greater range of comparison goods, alongside a fuller range of convenience products. Sainsbury's submitted a planning application to this effect in 2013 but it was withdrawn. This concept may no longer be a reasonable proposition based on the latest evidence relating to Sainsbury's capital investment plans. These have been paired back since the withdrawal of their 2013 planning application for this area. A research note by Goldman Sachs on the UK grocery industry, widely reported in the Press, also suggests that such a move is not all that likely to be desired by Sainsbury's.

11. However, under this aspirational land availability scenario, the wider Green Park area (both sides of the river) would become the absolute focus for a significant amount of additional retail space (alongside reorganisation & replacement of existing retail space). Broadly speaking this option would accommodate about 20,000 sqm GIA of replacement space and about 20,000 sqm GIA of new space<sup>1</sup>.
12. The replacement food retail/bulky goods retail space might logically be co-located with shared parking beneath the stores. The Bath Western Riverside SPD rejects large grade level parking areas. Replacement 'retail shed' space could be accommodated within part of the Pinesgate Gyrotory / petrol station area or part of the Pinesway Industrial Estate Area, subject to land availability. There are also examples of large food stores being vertically integrated with housing above e.g. the Sainsbury's store in the New England Quarter, Brighton and in the centre of Milton Keynes.
13. Broadly speaking the additional retail space, could be accommodated on the ground floors of new buildings framing a new street running on a flexible axis from Green Park Station to Stothert Avenue (the entrance to the Western Riverside housing development).
14. An office cluster of about 17,000 sqm GIA is envisaged and this could be located either side of the river, between Midland Bridge and the bridge linking Sainsbury's and Homebase. However, this would largely be replacement office space for the Pinesgate gyratory (if remodelled/reused for replacement retailing) and the net gain would be in the order of 7,000 sqm.
15. Residential development (assuming 39,000 sqm over 6 floors yielding 450 flats) would logically be focused in the north of the area, adjoining the Alison Brookes designed housing that is currently being constructed adjoining the Homebase car park. If Sainsbury's were to move, there would also be an opportunity to create an east side to Norfolk buildings and develop the southern side of James Street West for housing (at 9,000 sqm over 3 floors yielding 100 units). That is about 550 housing units overall.
16. Therefore, in Option 1, the primary focus for the Green Park Station area and proposed Sydenham Park area is 'edge-of-centre' retailing focused around and to the south of a new street/ running from Stothert Avenue to Green Park Station. Significant residential

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<sup>1</sup> see paragraph 24



development could take place to the north of this. Bulky and food retail would be to the south. Within this site area there would also be scope for moderate levels of office space relative to other uses.

17. **The former Bath Press** is identified as an employment location capable of hosting large footprint structures and **Roseberry Place** is identified as mixed use employment and housing location in Option 1, reflecting Policy B3 of the Core Strategy.

## Option 1b (Height & capacity reductions and use adjustments)

18. The spatial strategy of Option 1b is the same as Option 1a but with an indicative 15% reduction to the floorspace capacity of **Avon Street**. This is assumed to bring 5/6 storey riverside buildings down to 4/5 storeys. This would bring the capacity of Avon Street down to 30,500 sqm (-5,500 sqm). In respect of land use adjustments, drawing on paragraph 6, the removal of 100 'surplus' hotel bedrooms from within the city centre would cater for about 3,500 sqm of that lost floorspace. This would still leave capacity for a more modest hotel on this site. The other 2,000 sqm could be deleted proportionately (70%/30% or 1,400/600 sqm) between office and residential space.
  
19. A further 'adjustment' within this option could be made at North Quays in respect of the coach park area. This could remain as a coach park or it could become, in whole or in part, a replacement, multi-storey car park, perhaps including a basement or undercroft level to increase capacity. This would be instead of basement parking within the core of the site if this were not viable. There would however be some loss of floorspace for other uses (likely housing) and the interface between North Quays and South Quays (assuming a new pedestrian bridge could be delivered) might be affected from an urban design perspective.
  
20. At Sydenham Park if a sensitivity adjustment was made of 20% to the 39,000 m<sup>2</sup> (6 storey) residential space, one would lose about 8,000 sqm of residential space, bringing it down to nearer 30,000 sqm. That would yield about 350 dwellings rather than 450 dwellings.

## **Option 2a: Maintaining a compact and continuous primary shopping area. Sainsbury's remain in situ.**

21. An alternative to the establishment of an edge-of-centre 'high street' retailing area at **Green Park Station West and Sydenham Park** (a consequence of meeting the need for office space most centrally) would instead be to meet the need for retail floorspace as close as possible to the primary shopping area. In this scenario a lesser amount of office space would be allocated to **North Quays and Manvers Street** and the displaced office space would be added to the office capacity identified in Option 1 for the **Sydenham Park** area (replacing the retail growth concept here).
22. Option 2 also introduces a land availability constraint and assumes that Sainsbury's remains in situ. This would make land in the immediate vicinity of **Green Park Station** unavailable to accommodate part of the expansion of the primary shopping area. Instead, retail growth would either have to leap-frog to the **Sydenham Park** area (perhaps too far away in retail planning terms in respect of the compactness, continuity and future health of the existing city centre shopping offer) or, as it the decision in Option 2, it would be identified on the city centre sites that had been earmarked primarily for business use in Option 1. Retailing on these sites would be much more complimentary and better integrated within the city centre.
23. Option 2 assesses the same sites that are considered in Option 1. No additional sites are introduced beyond those considered in the Enterprise Area masterplan<sup>2</sup>.
24. Since the adoption of the Core Strategy the Council has reviewed future retail floorspace requirements. This identifies that there is a need for 7,000 sqm of city centre format retail floorspace to 2019, rising to around 20,000 sqm by 2029. These figures are for NET SALES AREAS. In addition to the net sales area, retailers need space for 'back of house' activities and this typically requires a 20% uplift. This means that the GROSS INTERNAL AREA to be identified is 8,500 sqm by 2021, rising to around 24,000 sqm by 2029.

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1. <sup>2</sup> Option 3 (from paragraph 54) introduces some alternative sites, on the margin of developability (i.e. they seem unlikely to become available during the plan period, but are nonetheless areas that detract from the Conservation Area/WHS from a Placemaking perspective).

25. In terms of scale, this means that 40% of the retailing GIA of Southgate could be supported by rising expenditure to 2021 rising to 85% of Southgate by about 2029. This is by no means an unreasonable prospect, although it does present a Placemaking challenge in respect of its physical accommodation within the city
26. These figures (give or take) were also evidenced at the time of the preparation of the Core Strategy. However, a decision was made not to plan/commit to them within the Core Strategy due to the need to first monitor the early impact of Southgate on the primary shopping area. Instead, small to moderate retail projects were to be sought, where appropriate as part of mixed use schemes. What that meant quantitatively was not defined, but around 10,000 sqm GIA rather than nearer 25-30,000 m2 GIA was the thrust of this idea. Southgate is now fully occupied and has been successfully absorbed into the shopping patterns of the city, without 'harming' the occupation of other shopping areas. Therefore it seems reasonable to reconsider whether a larger post-Southgate phase of retail development should be planned for (perhaps not all of it imminently) and if so where and how.
27. Option 2 shows how this could be accommodated centrally, as an alternative to Option 1, whereas Option 3, 'falls-back' to the small-moderate (10,000 sqm) Core Strategy scenario. During the on-going preparation phase of the Placemaking Plan contact will be made with retailers not present in the city, who might want to be, and a selection of retail developers to ascertain their view of the Bath market now and into the future. Of course the face of retailing will no doubt continue to change over the plan period and there may be a range of new entrants (and departures) from the high street.
28. When considering the thrust of Option 2 against Option 1 it is worth recalling that, as competing claimants on city centre land, office and retail occupiers have different features/requirements. Retailers require a street level presence and some require a first floor sales area too. Some retailers (department stores) require multiple floors and have very specific and large GIA and servicing requirements and could deliver much of /all the retail need in one large building. Most retailers do not occupy more than one or two floors, leaving the upper floors available for other uses. The need for natural light is also less of an issue for retail space meaning that deeper floor plans can be placed on sites and greater levels of floorspace achieved on these floors.
29. The total floorspace assumptions that are uses in Option 2 are the same as in Option 1. However, the estimates in Option 1 are based on office led structures and

environments. If **North Quays** and **Manvers Street** were to be retail-led there may be some difference to the overall capacity of these sites. Further testing is needed.

30. Option 2 focuses future retail expansion at **North Quays** (70% or 17,000 sqm of the long term assessed need for further retail space) and at **Manvers Street** (25% or 5,500 sqm). These figures mean a little short of 40% of the combined total floorspace capacity of these two sites (estimated as 60,000 sqm) would be retail orientated. It may be necessary to enable split level retail concepts to achieve these numbers. This is not a feature of Bath aside from at a small scale at **Milsom Place**) although it is a feature of other historic cities such as Cambridge e.g. the **Grand Arcade**. Alternatively a department store on multiple floors would claim a significant element of the space allocated. For example, a building akin to **Debenhams** at **Southgate** would require 11,000 sqm.
31. Due to the footfall generated in these areas a further 3,500 sqm of A3 space is allocated between, taking the 40% figure to 45%.
32. The headline feature of Option 2 (from a strategic perspective) is not so much the split between **Manvers Street** and **North Quays**, but the aggregate contribution they make to retail floorspace growth. Within Option 2 it would be equally valid for about 10,000 sqm GIA to come forward on **Manvers Street** (perhaps as a department store, perhaps not)) and for 12,500 sqm GIA to come forward at **North Quays**. To enable an alternative approach such as this, within in the framework of Option 2. the office floorspace would be reduced by 4,500 sqm at **Manvers Street** to 1,000 sqm, and increased by 4,500 sqm at **North Quays**, to 10,500 sqm
33. The **Cattlemarket** continues to play at the very least a small but important retailing role in Option 2. Should a larger multi storey retailing scheme be forthcoming this would also compliant with the intentions of Option 2, so long as the full capacity of this site was utilised (although this would not have to be completely for retailing).
34. Utilising the most central areas for retailing would maintain the compactness and continuity of the primary shopping area, which is a key attribute of the city centre. However, proximity to the primary shopping area not automatically equate to a good retail location. Much depends on the pedestrian connectivity that exists or that can be achieved, the scope for pedestrian/retail circuits/loops to be established and the flow of ground floor frontages between current and new shopping areas. The **Cattlemarket** is

well placed in this regard but **Manvers Street** and **North Quays** have some issues that would need to be overcome.

35. For example, in respect of **North Quays** the walk between Southgate and Avon Street Car Park through Somerset Street is not 'active' or attractive and the link between St James Rampire through Bath City College is also inadequate. Indeed, the entire arrangement of the City College in its block acts against the integration of a development at North Quays (whatever the reuse) into the core of the city. In Option 3 the long term potential of the City College site is considered, but this might not be deliverable in the plan period. **Manvers Street** has good north south- footfall along it, but the scope for lateral integration with Southgate to the west via active frontage is not great via Henry Street or Railway Street. Southgate e.g. the service yard off Henry Street rather turns its back to Manvers Street. Could a retail destination be created within Manvers Street? Would it work? The Council is undertaking further assessment of the attractiveness to the retail market of different site options.
36. Turning now to the 55% of floorspace remaining to be allocated at Manvers Street and Bath Quays North within Option 2.
37. As in Option 1, **Manvers Street** retains a hotel, although (150 rather than 177 beds) and the residual floorspace (11,000 sqm) is split evenly between office and residential uses.
38. At **North Quays** the residual floorspace after accommodating retailing and food/drink uses is 16,750 sqm. A hotel is retained but it is smaller. A residual floorspace figure of 11,500 sqm is split evenly between office and residential uses.
39. A defining feature of Option 2 is that **Manvers Street** and **North Quays** yield about 11,000 sqm of office space, compared to about 30,000 sqm in Option 1. This would be the case whatever the retail split between these two sites.
40. The package for **South Quays** remains as in Option 1. This is considered to be a good business location that has no realistic retail credentials. It is especially necessary to retain an office-led concept here in Option 2 given that the office capacity of North Quays in Option 2 has been significantly reduced. To the west, the **South Bank** is less office dominant than in Option 1 and instead is allocated for a 50/50 split between employment / trade retail/sui generis and residential. This could involve the retention

of the existing uses on site with housing above or the departure of the existing uses to be replaced with mixed office and residential development. The Option 2 mix for South Bank (being less overtly office focused) together with the significantly reduced role of Manvers Street and North Quays in respect of office development generates a greater commercial role for the proposed '**Sydenham Park**' to play.

41. There are two 'live' planning applications in the **Green Park Station West** and **Sydenham Park** areas that are being determined. In Option 2 these applications are not recognised as a 'constraint'. However, they are recognised as a constraint in in Option 3.
42. Option 2 assumes that Sainsbury's continues to occupy its current site, but that it implements a previously consented 1,000 sqm extension to the rear. The James Street West frontage is redeveloped for 100% housing at a suitable density replacing existing outmoded office space. The development capacity at **Green Park Station West** would therefore relate solely to these two elements.
43. Turning to **Sydenham Park**, the non-relocation of Sainsbury's would remove the need for a large bulky goods retail structure to co-locate convenience and comparison retailers. The minimum requirement would potentially be for a smaller comparison goods bulky goods retail unit. The situation of the current retail unit blocks the optimal redevelopment of this area. In order to realise its potential, this bulky goods retail floorspace would need to be re-accommodated within the site or off-site. The occupier of the current unit has a lease with British Land that will end in 2021 and this will generate the potential for change in this area. The occupier has also announced a 25% reduction in the number of its stores by 2019. It is not known how this announcement and the end of the lease might affect the Home Rail Group intentions for a Bath store. The presumption in Policy B2 of the Core Strategy is that efforts should be made to relocate existing uses that are compatible with the future function of an area, within the site, although there is also scope not to do this. It depends on the impact on achieving other land uses.
44. Although Sainsbury's do not re-locate in Option 2, it does not necessarily constrain the redevelopment of the petrol station area, as it would still be possible and desirable to re-accommodate this elsewhere within **Sydenham Park**. However, there is also a reasonable prospect that it will simply remain in situ. The alignment of the Pinesgate gyratory could also be adjusted to achieve an optimal urban design response. However,

the highway network must also continue function effectively, which may act against the optimum urban design response. The greater the flexibility in respect of these matters the greater the overall capacity (assuming the highway can function) and the greater the likelihood, it would seem, of being able to re-accommodate a bulky goods retail role.

45. In terms of the land use mix for **Sydenham Park**, Option 2 seeks to enable the delivery of 78,000 m<sup>2</sup><sup>3</sup>

- 35,000 sqm of office floorspace (falling to about 25,000 net after the assumed demolition of the existing Pinesgate.
- 30,000 sqm of residential space (400 dwellings)
- A bulky goods retail unit of about 4,500 sqm (including 1,000 sqm mezzanine and further 2,000 sqm of outdoor storage, sales and delivery space. A hitherto unseen parking solution would potentially be needed to support such an operation if it is to be accommodated here
- 1,500 sqm of A3
- Space is also identified for an as yet unidentified civic project of about 5,000 m<sup>2</sup> e.g. library, sports centre, museum, exhibition space

46. **Bath Press and Roseberry Place** remain as mixed employment and residential allocations as in Option 1. However, in Option 2 the Bath Press plays less of an employment role and more of a residential role.

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2. <sup>3</sup> Further work is needed to test and refine the total capacity of this area, based on various scenarios of land availability (in principle and in time), uses to be accommodated, and planning and highways constraints



## Option 2b (Height & capacity reductions and use adjustments)

47. The spatial strategy of Option 2b is the same as Option 2a but with an indicative 15% reduction to the floorspace capacity of **Avon Street**, which is assumed to bring six storey riverside buildings down to 4 storeys. This would bring the capacity of Avon Street down to 30,500 sqm (-5,500 sqm). To compensate the 5,500 sqm hotel allocation would be deleted and redirected to Sydenham Park, with knock on adjustments here to the capacity for residential development.
48. Once again a further 'adjustment' within this option could be made at North Quays in respect of the coach park area. This could remain as a coach park or it could become, in whole or in part, a replacement, multi-storey car park, perhaps including a basement or undercroft level to increase capacity. This would be instead of basement parking within the core of the site if this were not viable. There would however be some loss of floorspace available for other uses and the interface between North Quays and South Quays (assuming a new pedestrian bridge could be delivered) might be affected from an urban design perspective.
49. At Sydenham Park if a sensitivity adjustment was made of 20% to the 39,000 m<sup>2</sup> (6 storey) residential space, one would lose about 8,000 sqm of residential space, bringing it down to nearer 30,000 sqm. That would yield about 350 dwellings rather than 450 dwellings.
50. If a hotel was to be accommodated here rather than at North Quays a further downward adjustment in relation to housing would be needed

**Option 3: This lies between the ‘bookends’ of Options 1 and 2. It acknowledges that live applications at Green Park Station and within Sydenham Park may, at least in principle, be determined favourably. This would potentially ‘lock-in’ the future development of part of these sites. It also introduces two additional sites not considered in the EA masterplan (Cattlemarket-extension and the City College). It plans for 40% of the evidenced retail need in central locations. 60% of the retail need is not met.**

51. In Option 3 an **extended Cattlemarket site** is identified that includes the existing Hilton Hotel. The optimum future for this area from a Placemaking perspective would be to achieve the redevelopment of the Hilton Hotel site. The way achieve this would be to allocate the Cattlemarket site for a replacement hotel and to build this within a first phase of development, whilst the current hotel remained operational. Upon completion the current hotel could be demolished and redeveloped.
52. Option 3 proposes that the redeveloped hotel site could host 1,750 sqm of retailing /A3 on the ground floor with 5,500 sqm of residential / and 3,750 sqm of office space commercial above.
53. In respect the growth of office space, within the city centre Option 3 lies between between Options 1 and 2. **North Quays** (12,000 sqm), **Manvers Street**, (7,500 sqm) and **South Quays** (15,000 sqm) provide 34,500 sqm of new build office space, rising to 37,000 sqm if part of the listed industrial buildings on **South Quays** are also converted for business space.
54. In respect of the primary shopping area the identification of about 10,000 sqm of net additional retail floorspace is allocated to between **Walcot Street, Manvers Street** and **North Quays**, with **North Quays** playing the greatest single role.
55. This core retailing ‘offer’ of Option 3 could be supplemented by ‘bonus’ retailing within an incrementally redeveloped City College site. The objective would be to create pedestrianised streets with ground floor retailing linking James Street to Corn Street and North Quays. This Option does not budget for concept as being deliverable at this stage, but as this is as Placemaking Plan at Options stage it would be remiss not

to at least identify an area of the city that would benefit from improvement and which could contribute to a considerably improved south fringe to the city centre.

56. Option 3 proposes that office space form the primary component of each of the aforementioned sites, but it not so overtly office-led as Option 1. More emphasis is given to integrating and maximising ground floor retailing to create a lively streets within these sites. The concept is to remake these areas of the city so that they contribute to the centre liveable neighbourhood, finding a balance between the city centre as a regional economic centre and as dwelling place. Option 1 achieve this at the macro scale via coarse zoning, whereas Option 3 seeks to also achieve this at more of a micro scale with a finer grain of uses.
57. **Rosewell Court and Plymouth House** are not considered to be reasonable contenders for redevelopment during the plan period. Although they are major detractors from the Conservation Area and World Heritage Site, the area is in residential use as affordable housing. During the preparation of the Core Strategy Curo indicated that this area was not 'on their radar' for redevelopment. Since the adoption of the Core Strategy Curo has made public its intention to redevelop the Foxhill estate alongside the redevelopment the Foxhill MoD site. It seems reasonable, therefore (at Options stage of the Placemaking Plan) to at least consider and again rule out Rosewell Court as a site allocation, rather than to simply not mention it. The tall building in the core of the site may look more incongruous in the townscape once Kingsmead House is demolished to make way for a lower building (with twice as much floorspace) for use as a hotel. The area could be redeveloped could be to create a much improved environment, maintaining or increasing the number of dwellings with retailing at ground floor level. Nevertheless, the Council's assumption as the moment is that there will be no change here during the plan period.
58. At the **South Bank** Option 3 assumes a reduced capacity based on the retention of land in this area for large footprint commercial uses. However it encourage the intensification of these areas via remodelling to make the most of the 'airpace' above the current structures.
59. At **Green Park West** Option 3 assumes that permission is grated for student accommodation on James Street West, that Sainsbury's remains in situ and that the only real potential is an extension to the existing store.

60. The future for **Sydenham Park** in Option 3 is largely as in Option 2, only with a little less office space and a little more residential space. The most important observation is the choice in Option 3 to meet the residual need for retail space in this location, and therefore at all. The reason for this are that 60% of about 25,000 m<sup>2</sup> probably doesn't generate the critical mass needed to create a new peripheral destination that would be appeal to developers or occupiers. Further, to create the critical mass necessary would require more development which at such a scale would be likely to have negative consequences for existing primary shopping area, if successful. A retail concept here was not viewed favourably by the Inspector to the BANES Local Plan (2007). Although she was assessing the need for retail growth in a different context, some of her observations are relevant to the period 2011-29, given the alternative that are available. Further work is being undertaken to explore the nature of retailing that may (or may not) be suitable and deliverable within this area. This may challenge the current approach of Option 3 and suggest that there is a retailing role of some quantum for this area. The emerging design principles for this speak of a new street running a flexible east-west access. That street will need animating.
61. Option 3 retains the approaches in Option 2 for the **Bath Press** and **Roseberry Place**
62. As for Options 1 and 2 and 3b approaches would be similar in strategy to 3a but with some adjustments to overall capacity.