

Bath and North East Somerset

Placemaking Plan

Part 2 of the Local Plan
Draft Plan

Cabinet version: 2 December 2015

December 2015

DRAFT PLACEMAKING PLAN

EXPLANATION

The Placemaking Plan allocates specific sites for development and outlines a district-wide suite of planning policies. It complements and seeks to deliver the strategic framework set out in the Adopted Core Strategy. The Core Strategy forms Part 1 of the B&NES Local Plan and the draft Placemaking Plan is Part 2. For the purposes of clarity and convenience for plan users the Plans have been combined. Core Strategy text is that which is highlighted in grey. Any changes to the Core Strategy text are indicated by 'strike through' for deletions and 'underlining' for additions and are not highlighted in grey. In these instances the Placemaking Plan policy or text will supersede that set out in the Core Strategy. In combining the two Plans the text has been numbered sequentially. Core Strategy policy numbers remain unchanged.

2. BATH

Setting the Agenda

Context

Historical Context

“continuous development over two millennia”

WHS Statement of Significance (2010)

1. From its early history as a Celtic place of reverence and as a spa during Roman occupation, Bath evolved into a Saxon monastic settlement and subsequently a Norman cathedral town. During the Middle Ages it developed into a regional market and a centre of the woollen trade before becoming perhaps the most significant national health resort of Elizabethan and Stuart England. Rapid expansion in the Georgian era saw Bath become the foremost fashionable resort of the 1700s, and created an enduring architectural legacy.
2. At the beginning of Victoria’s reign Bath was the 9th largest town in England with a population of nearly 50,000. Thereafter Bath lagged behind the national level of industrial urban expansion and instead Bath refined its image as a place of genteel residence and retirement. Many pinned their hopes of a social revival with Brunel's Great Western Railway, but this did little to reignite the popularity of the city. Instead the railways served to crystallize an industrial strip of mills and foundries along the River Avon as far as Twerton. Towards the end of the Victorian period the Corporation sought to revive the city as a spa upon the rediscovery of its Roman origins. However, little came of efforts to establish Bath as a leading therapeutic centre.
3. The pace of growth in Bath was slow during the early part of the 20th Century, a reflection of the depressed state of the national economy, but the aftermath of WWI resulted in a great deal of inter war house building and a surge in the land coverage of the city. In the inter war period the southern part of the landscape bowl at Southdown and the Odd Down Plateau was colonised. Elsewhere, suburban development took place at Weston and Larkhall and new neighbourhoods were connected to the centre by the Bath Electric Tramway. After the Second World War Bath was caught up in the process of rapid socio-economic change that was at work in the country as a whole. Change within the city reflected many national trends, including the growth of private motoring, modernist reconstruction and the subsequent rise of the conservation movement. In 1987, in recognition of its unique cultural value the city was inscribed as a World Heritage Site. This raised its international profile as a tourist destination and has sharpened debate about how change and development should be managed and what 'sustainability' means for the city and its future.
4. Bath has exhibited a positive genius for reinventing itself and will need to do so again in order to emerge from the economic shocks of the early 21st century as a more environmentally sustainable and economically competitive place that stewards well its remarkable cultural inheritance.

Strategic Issues

- 1. The history of Bath has included several changes of image, function and fortune but it maintains a strong place in the popular imagination as an elegant Georgian spa town with a remarkable Roman legacy. The city retains many of the characteristics which have made it a place of high environmental quality and a desirable place to be for previous generations. The approach to planning for 21st century Bath must be driven by these qualities so that the city continues to be a distinctive, successful and competitive place.*
- 2. The conservation and enhancement of the World Heritage Site (WHS) and its setting and of the Conservation Area must be reconciled with contemporary socio-economic and environmental challenges, including climate change. Bath's WHS status and environmental quality is not an obstacle to economic growth - it is part of a strong 'brand', an incentive to and enabler of prosperity – however, it does require that contemporary change is managed sensitively and that high quality design is achieved.*
- 3. The Council's Economic Strategy and research by Business West sets out the current health of the city and considers its future prospects. Bath's prosperity depends on enabling the growth of existing business, attracting high value added employers and moving towards a low carbon economy. It will have to compete with other cities and large towns also wishing to attract growing sectors. This will require a new phase of investment in offices and other workspaces within and adjoining the city centre. It also means optimising the contribution of both universities to the economy as sources of creativity, innovation and labour and enabling the development of related employment and business premises.*
- 4. Alongside measures to diversify the economy, industrial enterprise must be allowed to compete in the land market in order to sustain a mixed employment offer for a multi-skilled workforce.*
- 5. The strategy for the city must sustain and refine the critical contribution of tourism to the economy. This means protecting and enhancing the characteristics that make the city special, providing a high quality public realm and ensuring that an appropriate level and range of visitor accommodation is maintained.*
- 6. The housing market is particularly expensive to penetrate and this contributes to a dislocation of workers from workplace and exacerbates the level of in-commuting from lower cost locations. More housing and more affordable housing is needed to support economic growth, increase the co-location of jobs and workers, and address the needs of households on the housing register.*
- 7. There is a significant imbalance between the resident workforce and jobs in the city. The main place of employment for about 30% of the resident workforce is outside Bath and the city imports many workers from beyond its boundaries, particularly from the market towns of West Wiltshire.*
- 8. There are considerable areas of derelict and underperforming land and a number of prominent sites in need of redevelopment in order to enhance the World Heritage Site and protect its setting and the Green Belt from incursion.*

9. *The public realm of the city centre is suffering from decades of underinvestment and a much better relationship is needed between the city and its river.*

10. *Congestion on the main radial routes, the city's air quality management areas and climate change require that the spatial strategy makes the most of existing public transport infrastructure and planned investment. In this way growth can enable people to travel to and around the city with less environmental impact and greater efficiency.*

11. *In order to enable development in the Central Area and Western Corridor significant works will be needed to mitigate flood risk together with essential land remediation.*

12. *Much of the building stock of the city is energy inefficient. Planning policies should enable improvements to the energy performance of Bath's buildings and also the generation of low carbon sources of energy.*

13. *The development of the University of Bath and Bath Spa University requires strategic policy direction in order to secure the future of each institution, and to ensure that the student population does not continue to drive the student lettings market to the detriment of the normal private housing stock and existing communities. The recently revised growth aspirations of both the University of Bath and Bath Spa University is putting significant pressure on the city's housing stock for conversion to HMO's (Houses in Multiple Occupation), and the demand for purpose built student housing is competing with the Council's priorities of delivering housing and employment.*

14. *The Bath/Bradford-on-Avon Special Area of Conservation (SAC) is designated because of the presence of bats and their foraging areas. Bats are protected under European and UK legislation and care must be taken to avoid impacts to the integrity of the SAC.*

15. *The prosperity of Bath depends on maintaining the city as a place which draws visitors who are attracted by the mix of shops, restaurants, and cultural and heritage facilities. The plan aims to ensure that Bath promotes a distinctive shopping experience at the leading edge of retail development, and that Bath is seen as the place for high quality, locally produced goods and foods.*

16. *Promoting Bath as a 'Spa' City; providing a high quality tourist experience where visitor stay is extended; enhancing the cultural and visitor offering; and promoting the City as a world class venue for sport and recreation.*

17. *Central Bath is unusual in that it is home to a large number of residents as well as shops, businesses and heritage sites. Some ten thousand people, including many families, live in central Bath. This large number of residents contributes to the vitality and vibrancy of Bath, day and night; and to the special character of the city centre. Owner-occupiers care for the historic Georgian houses everywhere in Bath at their own expense. The Council will encourage and support residents in central throughout Bath.*

World Heritage, Regeneration and 'Place'

5. In addition to enabling the delivery of the Sustainable Community Strategy, the Bath spatial strategy seeks to contribute to the actions proposed in the City of Bath World Heritage Site

Management Plan (November 2010) that seek to protect the Outstanding Universal Value (OUV) of the site and its setting. The significance of the WHS is set out in the Statement of Outstanding Universal Value and derives from the city's Hot Springs, its Roman Archaeology; Georgian town planning; Georgian architecture; the green setting of the City within a landscape bowl. The Cotswolds AONB Management Plan is also important in this regard as Bath's townscape and landscape combine to form a special composition of town and country.

6. In 2006 the Council published 'The Future for Bath' in which it sought to define the essence of the city - its DNA. It articulates a suite of regenerative themes, derived from the aspirations, intentions and activities that have shaped Bath's socio-economic history and character. It proposes that these influences should be reinterpreted and translated into a contemporary context to inspire a distinctive future place brand and identity. The themes are:



7. The Bath spatial strategy has been prepared against the background of this regeneration agenda so that it contributes to the realisation of a distinctive and authentic development programme for the city. As an international cultural asset, well considered and high quality growth is a key principle guiding the overall level, type and design of new development. The strategy prioritises the creation of enduring developments, places and neighbourhoods over 'planning by numbers' in order to deliver relatively short term targets. It seeks to shape development that will be appreciated and used well into the future and to deflect ill-conceived proposals that might be rejected within a generation.

8. The Public Realm and Movement Strategy for the city centre has already responded to this agenda in order to shape investment in the city centre. It sets out a programme to reanimate the city centre by:

- Rebalancing the movement and transport systems in favour of pedestrians, cyclists and public transport users
- Refashioning streets, spaces and the riverside including pavements, seating, lighting, etc.
- Revealing the centre through a new wayfinding and city information system.

9. Progress on these issues has been made possible through funding secured by the Council from the EU CIVITAS programme.

Vision and Spatial Strategy for the City

A Vision and Strategy for the City

9. The key strategic issues, along with other plans and the Future for Bath have informed a vision for the city as set out below. The spatial strategy for Bath and strategic policies for specific areas set out in this chapter seek to deliver this vision.

The Vision

What the spatial strategy is seeking to achieve:

Bath's natural, historic and cultural assets, which combine to create a unique sense of place of international significance, will be conserved and enhanced to maintain the city's key competitive advantage and unique selling point as a high quality environment, to live, grow a business, visit and invest.

The scope to further improve Bath's environmental quality will form the foundation of efforts to boost the city's profile as a more competitive and economic centre. The realisation of a range of development opportunities within the Central Area and Enterprise Area will greatly improve the city aesthetically and also enable Bath to position itself as a more entrepreneurial, innovative, creative and business friendly place. Economic development and productivity will therefore be stimulated and facilitated, whilst simultaneously upgrading inherited townscape.

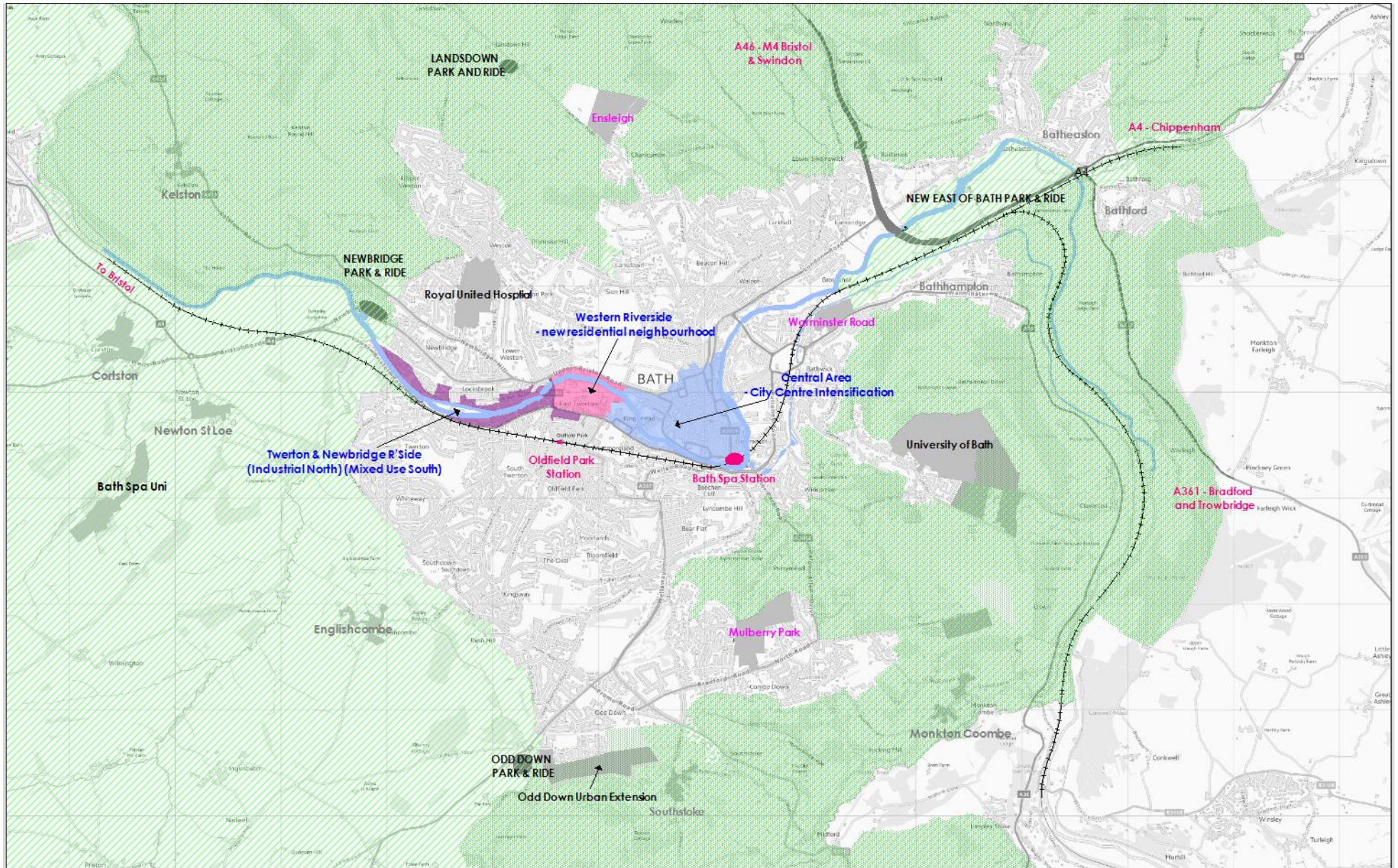
Where possible the built environment will evolve in a more energy and resource efficient manner and renewable and sustainable energy, appropriate to the Bath context will be introduced, alongside measures to mitigate and adapt to climate change and to pursue a reduced carbon economy, The delivery of new housing is a vital component of the vision and will help to create a sustainable relationship between the city's labour and job markets and support Bath's economic potential.

The need for more housing will enable the regeneration of many areas within the city. Where development is needed on the edge of Bath it will be positioned, master planned and designed to sustain the 'significance' of Bath's heritage assets and the integrity of its landscape setting. Parallel investment in public transport infrastructure and walking and cycling routes will keep the city moving and enable more sustainable travel choices to be made.

Bath's already strong identity as a therapeutic place will be enhanced by boosting its performance as an enjoyable city for leisure, recreation and shopping with a vivacious cultural scene and a highly valued green infrastructure network.

***Diagram 5 - BATH SPATIAL STRATEGY
(replaced by the Diagram on page 6)***

Diagram 5 - BATH SPATIAL STRATEGY



Text shaded grey is from the adopted Core Strategy not part of the consultation.

POLICY B1: Bath Spatial Strategy

The strategy for Bath is to:

1. Natural and Built Environment

Sustain and enhance the significance of the city's heritage assets, including:

a: The Outstanding Universal Value of the City of Bath World Heritage Site and its setting.

b: Listed buildings, the Bath conservation area and their settings.

c: Archaeology, scheduled ancient monuments, and historic parks and gardens.

d: Non-designated heritage assets of local interest and value.

e: Giving great weight to conserving landscape and scenic beauty in the Cotswolds Area of Outstanding Natural Beauty

f: The network of green spaces and wildlife corridors including the River Avon and Kennet and Avon Canal, Local Nature Reserves, formal and informal parks and recreational areas, trees and woodlands.

g: The biodiversity resource including species and habitats of European importance.

All of the following objectives will be considered in the context of part 1 of this policy:

2. Economic Development

a: Plan for an overall net increase in jobs of 7,000, rising from 60,200 in 2011 to 67,200 in 2029, with significant gains in business services tempered by losses in defence and manufacturing.

b: Plan for the expansion of knowledge intensive and creative employment sectors by enabling the stock of office premises to increase from about 173,000 m² in 2011 to about 213,000m² in 2029.

c: Achieve the net additional increase to the stock of office premises of 40,000 m2 by enabling the development of 60,000m2 of new space, linked to a release of 20,000m2 of that which is qualitatively least suitable for continued occupation, or which has been changed as a result of the introduction of permitted development rights.

d: Focus new office development within and adjoining the city centre and enable appropriate levels of business space in mixed use out-of-centre development sites.

e: Plan for a contraction in the demand of industrial floor space from about 167,000m² in 2011 to about 127,000m2 in 2029 but sustain a mixed economy to support Bath's multi-skilled workforce and multi-faceted economic base by retaining a presumption of favour of industrial land in the Newbridge Riverside area.

3. Housing

(a) Enable the development of about 7,020 new homes, increasing the overall stock of housing from about 40,000 to 47,000. The following distribution of housing will be planned for:

Large sites in the Central Area and Enterprise Area – 3,300

Large sites in the outer neighbourhoods, including former MoD land and the extension to MoD, Ensleigh – 2,100

Small scale intensification distributed throughout the existing urban area 1,150

Land adjoining Odd Down – 300

Subject to compliance with all other policy considerations residential development will be acceptable in principle provided the proposal lies within the existing urban area of Bath as defined by the Green Belt boundary.

4. The Relationship between Population, Labour Supply and Employment

a: At the margin of delivery, achieve a better balance between the overall number of jobs in the city and the resident workforce. A sufficient increase in housing delivery and the associated growth of the labour force will reduce the need for labour to be imported from neighbouring locations. Economic diversification will reduce the need for a significant minority of resident workers to out-commute to other areas.

b: Reduce the proportion of the resident workforce who out commute and enable a shift in the level of self-containment from 70% to nearer 80%.

5. Previously developed land

a: Regenerate and repair a number of areas within the Central Area and Enterprise Area to create new areas of attractive and productive townscape and a much improved relationship between the city and its river.

b: Transform the Western Riverside area into a contemporary residential neighbourhood.

c: Redevelop surplus Ministry of Defence land at Foxhill, Warminster Road and Ensleigh to optimise the contribution that these areas can make to the city's development needs.

6. Shopping

a: 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

b: Enable small to medium sized comparison retail development that improves the shopping offer and enhances the reputation of the city centre.

c: Protect and where possible enhance the vitality and viability of District and local centres.

d: Focus additional convenience retail floorspace (beyond existing commitments) within and on the edge of existing centres before considering out-of-centre sites that might improve the spatial pattern of provision across the city.

e: Enable the provision of neighbourhood retail services at Ensleigh, Warminster Road, Foxhill, and associated with the Strategic Site Allocation adjoining Odd Down.

7. Higher Education

a: Enable provision of additional on-campus student bed spaces at the University of Bath and at Bath Spa University, and new off-campus student accommodation subject to policy B5, thereby facilitating growth in the overall number of students whilst avoiding growth of the student lettings market.

b: Enable provision of additional on-campus and in-city teaching and research space.

8. Tourism, Culture and Sport

a: Manage the provision of 500-750 new hotel bedrooms to widen the accommodation offer for the city, increase overnight stays and the competitiveness of the Bath as a visitor and business destination.

b: At the Recreation Ground, and subject to the resolution of any unique legal issues and constraints, enable the development of a sporting, cultural and leisure stadium.

c: Enable the provision of enhanced facilities for interpretation of the World Heritage Site in the Central Area and for the nationally designated City Archives.

d: Enable the provision for a new cultural/ performance/arts venue within the Central Area.

9. Public Realm

a: Facilitate enhancement of the public realm of the Central Area and delivery of a Wayfinding and City Information System in line with the Public Realm and Movement Strategy.

10. Transport, Infrastructure and Delivery

To enable the delivery of the spatial strategy for Bath it will be necessary to implement the actions presented in Section 2G. In summary this means:

a: Implementing improvements to walking, cycling and public transport infrastructure, including the 'Bath Package', to improve connectivity to and from areas of housing, employment and neighbourhood centres.

Delivering the measures identified in the Council's Transport Strategy that are required to enable the economic growth aspirations of the city and the environmental improvements to be achieved.

b: Implementing a new Parking Strategy.

c: Implementing the Air Quality Management Plan for Bath.

d: Implementing flood mitigation measures to ensure development in vulnerable areas of the Central Area and Enterprise Area is safe whilst not increasing risk elsewhere.

e: Addressing land remediation within the Central Area and Enterprise Area in relation to industrial and utilities uses.

11. Energy conservation and sustainable energy generation

a: Enable renewable energy generation including the development of district heating networks.

b: Improve the energy efficiency of the built environment.

The World Heritage Site and its Setting

10. The World Heritage Site status of the city is a key material consideration when making planning decisions. As a designated heritage asset of the highest significance there is a strong presumption in favour of the conservation of the Outstanding Universal Value of the World Heritage Site. The significance of the WHS is set out in the Statement of Outstanding Universal Value (OUV) (2010) and is summarised in paragraph 2.05. The World Heritage Site Management Plan (2011-16) sets out the objectives and actions needed for the successful conservation and management of the Site. The Local Plan has a key role in the implementation of the Management Plan.
11. The setting of the World Heritage Site, beyond its designated boundary, is important as inappropriate development here could impact upon the Outstanding Universal Value of the site. The setting is the surroundings in which the World Heritage Site is experienced. It includes a range of elements such as views and historical, landscape and cultural relationships. The World Heritage Site Setting SPD provides the information needed to assess whether a proposed development falls within the setting, whether it will have a harmful impact and to what extent. The Green Belt, which closely surrounds the city, also plays an important role in protecting the setting of the WHS (see its purposes which are summarised in Table 8). The general extent of the Green Belt is retained by the Core Strategy and its openness is protected from inappropriate development. The boundary of the World Heritage Site and the indicative extent of the setting of the World Heritage Site is shown on the Policies Map.
12. Section 60 [Environmental Quality] highlights the Council's wish to enable the appropriate modification of heritage assets, including the World Heritage Site, for development that reduces carbon emissions. It also sets out that a Supplementary Planning Document provides detailed guidance on this matter.
13. The Core Strategy seeks to promote and reinforce local distinctiveness through high quality design that improves the environmental quality and character of the city and the way that it functions. In addition to normal processes of contextualisation in relation to neighbouring buildings and the wider area more generally, development must be demonstrably informed by an understanding of the Outstanding Universal Value of the World Heritage Site, its authenticity and integrity. Design that fails to conserve or take the opportunity to enhance the Outstanding Universal Value World Heritage Site will be rejected. The preparation of other local development documents, including the Placemaking Plan will ensure the achievement of high quality design.
14. To contribute to this process, a Building Heights Strategy for the area of Bath covered by the World Heritage Site designation has been prepared. The strategy provides area-based guidance on the appropriate height of new development to ensure the protection of the Outstanding Universal Value (OUV) of the Site.
15. The overall purpose of the strategy is to provide a framework within which decisions can be made about the appropriate height of new buildings in Bath. It will inform decisions about the value of sites, the Placemaking Plan and will act as a development management tool in the consideration of planning applications. The Strategy has been compiled in such a way that it can be used as the basis for a Supplementary Planning Document.

Policy B4

The World Heritage Site and its setting

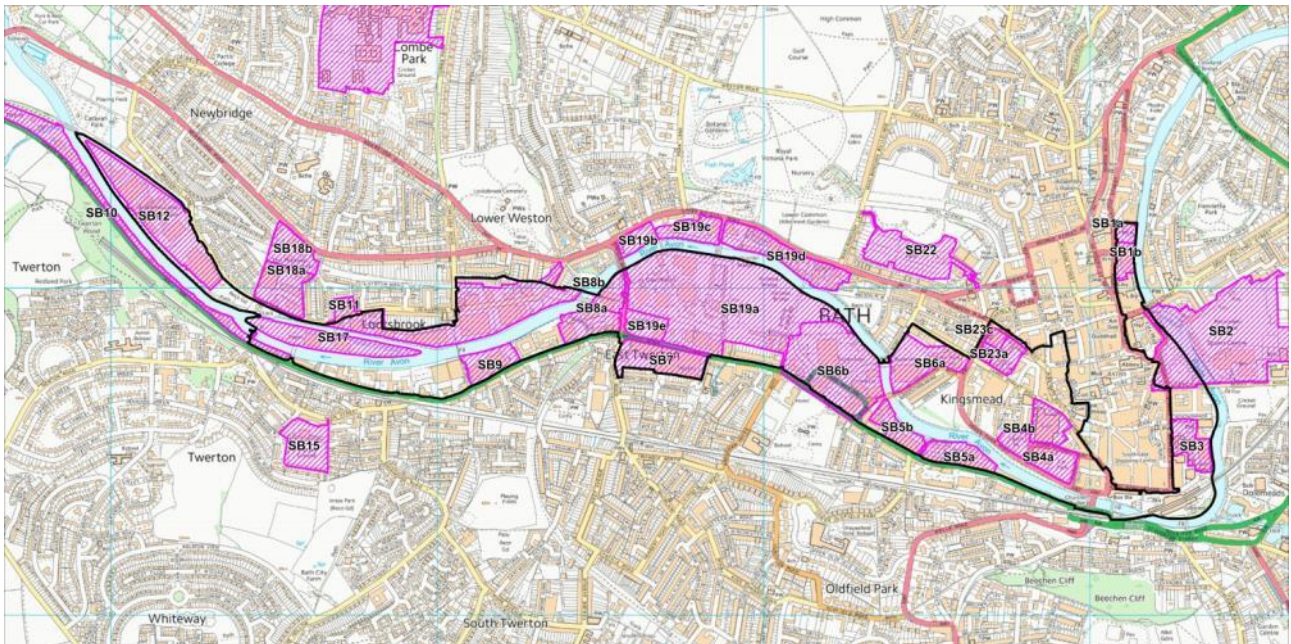
There is a strong presumption against development that would result in harm to the Outstanding Universal Value of the World Heritage Site, its authenticity or integrity. This presumption applies equally to development within the setting of the World Heritage Site. Where development has a demonstrable public benefit, including mitigating and adapting to climate change, this benefit will be weighed against the level of harm to the Outstanding Universal Value of the World Heritage Site.

Overview: Bath Sites

16. In the context of delivering the Core Strategy, there are a series of significant development opportunities within Bath that need to be taken forward with vision and aspiration. This must be intelligently applied, informed by a thorough understanding of the qualities of Bath as a place, its outstanding universal value as a World Heritage Site, and future role as a small, yet high profile city. The Placemaking Plan advocates a sustainable approach to city development so that enduring places are created. It establishes the conditions within which such positive change can take place and provides the detail to show how development within the city can benefit and enhance local communities.
17. The history of Bath and elsewhere shows that in many cases high quality buildings and places endure beyond the time of their creation and are often recycled with different uses/occupiers over time. The Placemaking Plan focuses on both the creation of new areas of townscape that help to repair and renew parts of the urban fabric, and the first package of uses that need to be accommodated to deliver the city's socio-economic needs for the current plan period.
18. In facilitating the delivery of development opportunities and setting out policies to manage development and change, the Placemaking Plan also needs to ensure that the functions and quality of the River Avon corridor and other elements of the city's extensive green infrastructure are protected and enhanced. This will work towards the delivery of the River Park concept as set out in the Enterprise Area Masterplan.
19. In enabling development the Placemaking Plan sets out a detailed planning and design framework for specific sites throughout the city. These will:
 - Set out a vision for the site.
 - Provide clear development and design principles as part of the policy framework for the determination of planning applications.
 - Resolve conflicting objectives in areas subject to development pressures
 - Protect environmental assets that are particularly sensitive to change
 - Help to stimulate development and enable the delivery of planned growth and economic potential
 - Act as a focus and a catalyst for key agencies and landowners to work together
20. There will be other development sites or buildings that are not included within the site allocations section, that may well come forward within the plan period. These sites are no less important, and development proposals will be required to respond to the policy context as set out in the Placemaking Plan. The development options of these sites are generally more limited, for example by virtue of some of them being listed buildings (e.g. Mineral Water Hospital and King Edward's School). There will however still be an expectation that these buildings will contribute towards the delivery of a range of uses that have been identified as being required in the city.
21. Other sites, such as Walcot Yard, will be informed by their particular physical or functional context, and by planning policies, including the 'Walcot Street Works' SPD.

Bath Enterprise Area and Masterplan

22. The Bath Enterprise Area is land designated as a key zone for economic growth by the West of England Local Enterprise Partnership. It has the potential to deliver more than half of the District's job growth during the Plan period and plays a key role in providing much needed accommodation for the area's flourishing high-value business sectors.
23. The Bath Enterprise Area Masterplan [insert hyperlink] was commissioned by Bath and North East Somerset Council to develop a vision for the Enterprise Area. It sets out a possible strategy for the delivery of the employment growth that B&NES is intending to deliver as part of the City Deal. The Masterplan sets out an overall level of ambition for bringing 'the riverside to life', and focuses on delivery and unlocking funding opportunities to enable the regeneration of riverside development sites.



24. As set out in the West of England City Deal agreed with Government, the main focus in the Enterprise Area is the delivery of economic and employment growth with up to 9,000 jobs planned to be delivered by 2030. This requires the delivery of around 60,000 sq.m. (gross) of new office floorspace within the plan period, and predominately within the central area. This is set out in Core Strategy Policy B1 and B2.
25. There is not enough land in the city to meet this and the other land use demands that have been identified by the evidence prepared for the Placemaking Plan. This is because Bath is a small city with relatively few development sites. The unmet need is not considered to represent exceptional circumstances for developing in the Green Belt and in any case is not viewed as overriding the great weight that needs to be afforded to the significance of heritage assets, not least the World Heritage Site. The Council has therefore had to prioritise land uses for the limited land available. It has agreed that it will plan to meet its housing numbers and employment floorspace in full, will strive towards meeting the projected growth in hotel demand, but will not be able to achieve this in full, and will accept that there is a shortfall in meeting the retail capacity identified for the whole plan period. The aspirations of the Universities are unlikely to be realised under this approach, but the Council will seek to enable their continued success as far as possible, so long as it does not put at risk the achievement of the plan priority land uses.

High Quality Design in Bath

26. To sustain and enhance the significance of the city's heritage assets as set out in Core Strategy Policy B1 (1), to respond to the requirements of Policy B4, and to complement the design policies in the development management section, this part of the Placemaking Plan outlines the issues to be understood in order to achieve high quality design within Bath.

27. This section sets out the **Design Values for New Development in Bath**, then introduces the **evidence base** that supports them, and culminates in a **design policy** for new development in Bath. This policy will be key in informing the design of emerging development proposals within Bath.
28. It will be supported by a Design SPD that will provide further guidance about achieving design quality in the city. This is scheduled to be prepared in 2016.

Design Values for New Development in Bath

29. The design of new buildings in Bath is a difficult and contentious subject. A straightforward question of ‘what should new buildings in Bath look like?’, is met with animated debate. Should new buildings continue the theme of Bath as a classically inspired city or should they reflect the spirit of the age, and adopt a modern approach to new architecture? Should they mimic the Georgian idiom, or should they be of their own time, whilst responding to their sensitive environmental context? Do copies of the Georgian architecture undermine the authentic, or do they continue an established precedent? Do they evolve a city renowned for design innovation or not? Are different approaches appropriate for different areas?
30. Whilst there are inevitably a wide variety of views about the best approach (or indeed which approach to take where), it is nonetheless an important issue that the Placemaking Plan – as the key planning document for managing change in Bath - should address. This is supported by paragraph 60 of the National Planning Policy Framework (NPPF) which states that:

Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.
31. The Placemaking Plan establishes a set of ‘Design Values’ for Bath in order to provide a context for considering the design of new buildings in Bath, to seek to ‘promote or reinforce local distinctiveness’ as required by NPPF, and as a means of creating authentic and locally distinctive enduring places, The ‘Design Values’ should be read in conjunction with the relevant evidence base including the Bath Conservation Area Character Appraisals, the Building Heights Strategy and the Morphology Study.
32. These Design Values are intended to assist in the design process of new development, without imposing ‘architectural styles or particular tastes’. They aim to encourage building design ‘innovation, originality or initiative’, and ensure that new development is authentic to Bath, not anywhere else. These design values are intended to help guide and shape the emerging outputs of development proposals, ensuring that they capture the essence of Bath’s DNA, and the key aspirations of the Council.
33. The design values have been derived from the ‘World Heritage Site Attributes’ [hyperlink], and from the work undertaken following the production of the Public Realm and Movement Strategy [hyperlink]. This established, via a collaborative stakeholder process, a set of design values for the public realm. These design values for new buildings in Bath will be used as the

basis to inform ongoing debate and understanding which will need to undergo a similar collaborative process to ensure that they are robust, and reflect aspirations for the visual appearance of new development in Bath.

34. The outputs are intended to result in a Design SPD that provides more detail and guidance to support the interpretation and implementation of these Design Values, and to provide a design guide for new development in the city.

DESIGN VALUES:

STRATEGIC DESIGN VALUES	Design Values for New Development
Reinforce a sense of composition and balance	<ul style="list-style-type: none"> • The deliberate creation of a beautiful city, one that is harmonious and integrated, and which is informed by an understanding of Palladio’s ideas to a city scale. • Elegance and beauty, achieved through consideration and understanding of proportion and human scale. • A limited palette of materials. • Read as one / Unity – part of a complete landscape / visual homogeneity, with • A consistency of building heights reflecting topography. • A deliberate close relationship between the built and unbuilt. • Importance of large trees in softening and unifying the townscape and in providing year round interest.
Design innovation & Details/Characteristics	<ul style="list-style-type: none"> • Building design – unified façade, with individual expression internally. • Contrast between formal front and informal backs. • Integrated relationship between the design of buildings and the design of the public realm (including wide flat pavements), facilitating social interaction and activity • Dramatic forms of development that blend and integrate with the landscape • City as theatre set, with visual surprises and open spaces. • The pursuit of excellence. <i>“The World Heritage Site is not a constraint, it is an invitation to excel”</i> • Mediocrity is not acceptable in new buildings, although this is not to be confused with <i>the ‘ordinary’, as long as it is good quality.</i>
Celebrate Bath’s Independent Spirit	<ul style="list-style-type: none"> • Bespoke • Foster the small scale • Many small, fewer big • Nurturing growth • Encourage and foster the individual and eccentric– entice the radical • Within a dominantly townscape approach, allow and encourage the occasionally high quality quirky, unusual or surprising details

	or building.
Craftsmanship	<ul style="list-style-type: none"> • Encourage the Inventive, the progressive and challenging. • Encourage craftsmanship in natural materials. • Simplicity, only using embellishment with purpose • Promoting the evolution or translation of design ideas, not mimicking / slavishly copying (unless exceptional circumstances) • Reuse of existing buildings
Life Enabling	<ul style="list-style-type: none"> • Encourage surprise, joy, visual interest and delight • Provide variety, interest, diversity • Enabling public life by creating positive and active relationships between buildings and the public realm, including the provision of wide pavements • Recognising the biophilic benefits of green infrastructure and an enhanced river and canal corridor. • Enable creative building design to create new space for wildlife and the natural environment. • The importance of established and created views
Looking responsibly to the future	<ul style="list-style-type: none"> • Design for people, for nature, for places • Energy efficiency and use of low carbon materials • Use of natural materials • Living roofs and other sustainable drainage features • Protect and further enhance ecological 'nodes' • Establish or strengthen habitat between these ecological nodes • Strengthen the connectivity between the river and the other linear biodiversity habitats

Building Heights Strategy for Bath

(also see policy D2 & HE.1)

35. As set out in paras 2.34 and 2.35 above, the heights of buildings are an important aspect of the visual homogeneity of the city, and new developments need to respond creatively and sensitively to their exceptional context. Development proposals must be designed to become an integral part of an expanded city, making their own contributions to the 'deliberate creation of a beautiful city'.

36. The Building Heights Strategy (2010) is an important part of the evidence base that informs the Placemaking Plan. It provides an overall context for considering building heights, then sets out the recommended heights for new development within different parts of the city. This approach is reflected in the site allocations section, but it will also apply as relevant to other development opportunities that may arise during the plan period, but which are not covered by a site allocation.

The Building Heights Strategy 'is based on the premise that the primacy of the Georgian City must be maintained physically and visually in the City of Bath. The Outstanding Universal Value of Bath is intrinsically linked to the Georgian City which is also the centre of the city and new development must be subservient to this hierarchy.'

36. There is a site specific principle contained in most of the site allocations throughout Bath which outlines the need for an analysis to be undertaken to enable an appropriate response, and to influence the height, form and design of new buildings. It sets out that the Bath Building Heights Strategy should be used as part of the evidence base. This same approach will be required for those development sites not covered by a site allocation, but which may impact on these issues of acknowledged importance.

Types of views and the distinctive character of Bath

37. This section provides a description of the importance of views and of their contribution to the distinctive character of Bath. Setting out that it is the interaction between the built and natural landscape through history and their influence upon each other that has created the unique composition of Bath. This characteristic is described in the Bath City-wide Character Appraisal (adopted as a Supplementary Planning Guidance in August 2005):
38. The way buildings respond to the topography; either following the contours or running up and down slopes perpendicular to the contours, has given a widely recognised beauty to the city reflecting the picturesque principles which were influential in the urban planning of the eighteenth and early nineteenth century. These principles continue to be valued and to influence subsequent phases of development of the city.

'The ingenuity and variety of architects' responses to the topography contribute greatly to the unique appearance of Bath.'

Bath City-wide Character Appraisal (2005)

39. This character is experienced from a myriad of views ranging from deliberately planned views to everyday views experienced by residents and visitors; these can be panoramic or glimpsed views. It is both the importance of these views as well as the importance of this character that enables understanding of Bath's particular distinctiveness. The city set within a hollow of the surrounding hills is an important component of the Outstanding Universal Value of the City of Bath World Heritage Site as expressed in criterion i) of the Adopted Retrospective Statement of Outstanding Universal Value:

'Bath's grandiose Neo-classical Palladian crescents, terraces and squares spread out over the surrounding hills and set in its green valley, are a demonstration par excellence of the integration of architecture, urban design and landscape setting, and the deliberate creation of a beautiful city... That the architects who followed were working over the course of a century, with no master plan or single patron, did not prevent them from contriving to relate each individual development to those around it and to the wider landscape, creating a city that is harmonious and logical, in concord with its natural environment and extremely beautiful.'

40. The urban design principles have given rise to a city with a remarkably uniform height interspersed with taller more prominent civic buildings, particularly churches with spires. The buildings set within the landscape provide a strong sense of a steady descent towards the River Avon and the valley floor.
41. The appealing harmony between landform (the hills and river valley) and buildings is evident in the variety of types of views, of and, from the city as summarised below.
- views from outside the city such as from Little Solsbury Hill or Dean Hill,
 - views looking across the city from open spaces such as from Kelston, the City Farm or Alexandra Park,
 - views from developed areas on the hillsides such as Widcombe or Lansdown; and
 - views from the city centre which are often framed such as along the river or along streets to the hillsides beyond.
42. Each of these types of view have their own characteristics often affected by the level of the viewing point of the onlooker. There are subtle differences in the view depending on the height at which they are viewed but for the purposes of the Placemaking Plan have been separated into high, intermediate and low level views.
- High level views, such as Alexandra Park, have the advantage of providing expansive fields of visibility and therefore provide a good panorama of the city demonstrating the relationship of buildings to the surrounding landscape and showing the hierarchy of buildings and the main periods of development.
 - Intermediate level views are those just above the tops of the general cityscape. It is here that the full beauty and character of the city can be fully appreciated potentially encompassing some or all of the following;
 - architectural detailing in the near distance,
 - views towards the river and low points of the city, and
 - the placing of the buildings within their landscape setting as they rise up the hills
 - the wooded skyline and hills in the distance.

It is very often the views from this intermediate level that were valued by visitors in the C18th and early C19th and which were recorded in paintings and prints albeit at a time when the city was far less developed.
 - Low level views from within the developed areas and below the general height of surrounding buildings by contrast tend to be framed views between buildings or between trees. They provide interesting and characteristic views of buildings as they rise from the valley floor often separated by open spaces and trees and typically leading to green hillsides and a wooded skyline.
43. Proposals for new interventions must be supported by an understanding of the importance of views to the significance and value of the place and its heritage assets. This understanding must be used to minimise conflict with heritage conservation.'

The City of Bath World Heritage Site Setting Supplementary Planning Document

44. The City of Bath as a World Heritage Site is unusual both in its size, encompassing the whole city, and in its complexity. It has a very large number of planning designations, designated and undesignated landscape and heritage assets, a complex mix of attributes and a setting which is an integral part of the significance of the site itself. The Statement of Outstanding Universal

Value is the primary source for understanding the significance of the World Heritage Site. Further guidance is provided in the list of attributes which convey the values and add to the understanding of the Outstanding Universal Value. The setting, in common with the World Heritage Site itself, has the purpose of protecting and enhancing the significance and understanding of the Outstanding Universal Value.

45. The World Heritage Site and its setting is a living and evolving environment whose long term protection and appreciation relies on changes and decisions about the management being informed by an understanding of the significance of the World Heritage Site and its setting. The City of Bath World Heritage Site Setting Supplementary Planning Document (2013) provides this understanding as summarised below.

- It supports policies for the protection of the World Heritage Site including recognising that changes in the Site itself and in the Site's setting can have either a positive, neutral or negative effect
- It seeks to facilitate appropriate management in support of the World Heritage Site Management Plan through guidance to ensure the characteristics that are significant are protected, conserved and enhanced
- It identifies aspects of significance as defined in the Statement of Outstanding Universal Value
- It provides understanding of the implications of any proposed changes and provides a framework for assessing effects using available methodologies and best practice.

45. It is designed to be used by developers, statutory undertakers and their advisors so that the issues can be fully taken into account when considering the siting and design of new development as well as to be used by policy and development management planners when considering development opportunities and development proposals.

Conservation Area Character Appraisals

46. Conservation areas have been an important policy instrument for managing change in the city since the first designation of six separate conservation areas in 1968. Various changes have been made to the boundaries of the conservation area in response to changing conservation views about what was considered to be architecturally and historically important as well as ongoing changes in planning controls. The current single conservation area first established in 1973, extended again in 1975, 1985 and then most recently in 2002.

47. In 2015 Bath and North East Somerset Council commissioned Conservation Area Character Appraisals for six different parts of the Bath conservation area. This is needed to better understand the importance of the conservation area, and to ensure that development proposals preserve or enhance their special architectural or historic interest. A key reason for undertaking these appraisals was to provide the evidence base to support the design and development principles for the site allocations in the Placemaking Plan, and to support proposals for non-allocated sites.

48. The character areas that have been assessed as part of the first phase of undertaking character appraisals across the city were based on those set out in the **Bath Citywide Character Appraisal**. This was undertaken in 2005 and was subsequently adopted as a Supplementary Planning Document. The city-wide character appraisal covers the whole of Bath and its

immediate environs and extends beyond the conservation area boundary. It provides a helpful starting point and background for a conservation area character appraisal.

49. The draft Conservation Area Character Appraisals that have been undertaken will be subject to public consultation before adoption. The character appraisals of the remaining parts of the Bath conservation area will be undertaken during 2016.

50. These initial draft character appraisal documents can be seen here:

- Brassmill Lane, Locksbrook and Western Riverside
- City Centre
- Bathwick
- Twerton, Whiteway, Southdown and Moorlands
- Pulteney Road
- North Road and Cleveland Walk

City of Bath Morphological Study

A morphological analysis provides a specification of the material out of which the city is made. Just as good joinery is underpinned by an understanding of the characteristics of different kinds of wood, if we want to manipulate and transform urban fabric successfully, we will make better decisions if they are informed by a detailed understanding of how places are put together in detail, how they work and how they connect to their surroundings.

Karl Kropf (2015) City of Bath Morphological Study

51. A Morphological Study of Bath was commissioned in 2014 as an important part of the evidence base to inform planning policy and future development proposals in Bath: ‘The study focuses on the patterns of streets and squares, the plots and buildings, their details and materials - the features that give the city its unique identity and acknowledged architectural, aesthetic, historical and archaeological value – and make the city so highly valued as a place to live and work.

52. The purpose of the study is to provide specific information about the structure, fabric and character of the city to ensure it retains its identity and value as it continues to develop and prosper. The basic principle that underpins this aim is illustrated by the widely recognised and well established Bath style and sense of ‘Bathness’.

53. The study examined the characteristics of the city, with a particular focus on the historic core and the river corridor. It ‘identified different parts of the city that have a unique character and identity due to their location, their shape and size and the pattern and arrangement of the physical fabric – streets, plots and buildings.’

54. Out of this analysis a series of design principles were generated for each area, as well as the following three core overarching principles:

‘Combinations of aspects

... Places work better when there is multifunctionality rather than a single use or element. A landmark and a gathering point together reinforce each other and create a more memorable place. While it is useful to look at places thematically it is essential to look at the way the different topics go together to give a place its life and identity.

Shared elements

... Where there are two areas next to each other, for example, and a landmark or node on the boundary between them, the landmark or node is perceived as part of both. The element is shared between the areas and becomes the pivot or pin that binds the two together, creating a strong sense of connection, even if the areas have very different character.

Persistence and inflection of forms

The third principle of persistence is rooted in the longer term transformation of places. Places get their identity from their history, in very physical terms, with the persistence of features over time. The most obvious example in Bath is the name and alignment of Upper and Lower Borough Walls. These streets follow the line of the former city wall. For the most part the fabric of the wall is gone but the line remains. Once a form like the wall is built, others that are added later are formed and inflected to adapt to it, reinforcing the shape of the first and helping it to persist.

55. All these principles can be used in the design process to help create places that are vibrant and successful, work together well as a whole and have a distinct identity.’
56. The study has informed the wording of the design and development principles contained in the site allocations section of the Placemaking Plan, and the requirement as set out in Policy D.2. The Morphological Study is an important design resource to be used to inform the design of development proposals within the city.

Public Realm

57. In 2010, the Bath and North East Somerset adopted the **‘Public Realm and Movement Strategy for Bath City Centre’**. It aims and objectives are captured in the extract below:

Creating the Canvas for Public Life in Bath – Public Realm and Movement Strategy for Bath City Centre recommends a radical and inspirational plan for the transformation of Bath’s urban environment. Although ambitious and aspirational, it is also pragmatic and flexible and can be delivered on an incremental basis over the next 10 to 20 years.

The strategy puts forward a series of measures to address traffic movement within and around the centre of the city in order to establish a network of beautiful new and reclaimed public spaces, successful streets and an enhanced River Corridor. It also recommends a programme of improvements to simplify, refashion and manage the public realm, including the removal of street clutter and the introduction of a new bespoke range of street furniture and pedestrian wayfinding products to enhance, reveal and communicate the distinctiveness and diversity of Bath.

The ultimate objective of the Public Realm and Movement Strategy is to stimulate a rediscovery of a vibrant public life within the city centre and to enhance the enormous potential of Bath as a place, not just for the benefit of visitors and businesses, but for the enjoyment, health and wellbeing of the community as a whole.

58. In support of the strategy and taking forward one of its actions, the Council has produced the **Pattern Book for the Public Realm** (2015). This 'sets out the framework for the quality of streets and public spaces in the city centre. It provides a comprehensive description of how the public realm should look and feel to ensure that it continues to uphold the heritage of the city's past, and at the same time adapt to the requirements of a sustainable, progressive and liveable city of the future'.

The Pattern Book is produced in two volumes:

- Volume 1, the Framework Guidance, describes the public realm of central Bath, the streets, squares and parades in which people interact with each other, the city's architecture and its landscape. It sets out principles which should underpin their layout.
- Volume 2, the Technical Guidance, translates these principles into practical instructions which describe how to implement the layout and arrangement of city centre streets and places, and the expectations for the quality of materials, their detailing and upkeep which should be implemented to make it a beautiful and durable place to live, work and visit.

59. Both the Public Realm and Movement Strategy and the Pattern Book are material considerations that set the standard that B&NES will expect from private sector development proposals to ensure that the highest standards of public realm are delivered across the city centre. The Pattern Book, whilst focussing on the city centre, also contains recommendations that will be of relevance in other parts of the city.

Green Infrastructure Strategy

60. The following text is extracted from the Council's Green Infrastructure Strategy (March 2013):

'The Council's Green Infrastructure Strategy is all about making sure that the natural environment works for the community, by making the most of the benefits that the natural environment can and should be providing for people, places and nature.

Green infrastructure is a term used to describe the networks of natural spaces and corridors that make up the natural environment in a given area. The range of benefits that green infrastructure can deliver are summarised as:

- supporting healthy lifestyles and
- thriving communities
- providing active access to the outdoors
- enhancing landscape character and built
- heritage
- enhancing biodiversity
- supporting healthy ecosystems
- providing climate change solutions
- £ invigorating the local economy
- and natural tourism
- enhancing sense of place
-

61. The Placemaking Plan will play a key role in enabling the delivery of the aims and objectives of the strategy.

BATH DESIGN POLICY

61. The Bath Design policy, which complements the design policies contained in the District-wide policies section, requires that the design of new development within the city responds appropriately or sensitively to its context. It is a policy that complements the design and development principles contained in the site allocations section, and helps to ensure the delivery of high quality contextual development that can sustain, complement and enhance Bath's historic environment, its townscape, landscape, assets and setting.
62. The policy brings together a wide range of issues, many of which have been introduced in the proceeding section and which are available via hyperlinks below:
- WHS Attributes
 - WHS Setting SPD
 - Bath City-Wide Character Appraisal
 - Building Heights Strategy
 - Conservation Area Character Appraisals
 - Morphology Study
 - Green Infrastructure Strategy
 - Public Realm and Movement Strategy
 - Pattern Book
63. The policy and other design related issues will be supported by a new 'Design SPD' that will be produced during 2016.

POLICY BD1: Bath Design Policy

All significant or sensitive development proposals within Bath are required to incorporate in their Design and Access Statement:

- 1. How the Bath design values and the relevant evidence base, have informed the chosen urban design, architectural and landscape approach, in terms of pattern of development, aesthetics, building form, use, materials and detailing.***
- 2. How the height and scale of proposed development has respected, responded and positively contributed to the character of Bath, its heritage and the values associated with it, and important views.***
- 3. How the proposals maintain the significance, integrity and authenticity of the World Heritage Site***
- 4. How the proposals preserve or enhance the character or appearance of that part of the conservation area.***

Proposals that fail to adequately address these will not be supported.

Addressing Flood Risk

64. The Council is implementing the Bath Quays Waterside project which will put in place essential flood mitigation and flood defense works to the north and south banks of the river between Churchill Bridge and Midland Bridge. These interventions will:
- Reduce existing and future flood risk to the Lower Bristol Road and over 100 residential and commercial properties on the south side of the river through the provision of new flood defenses;
 - Provide the flood mitigation to enable the redevelopment of the Bath Quays and Manvers Street sites in order to realise the Council's 'Bath Quays' project and deliver new jobs and homes.
65. While the Bath Quays Waterside Project was conceived as a flood mitigation and defense project, it is also a major opportunity to overcome the city's history of turning its back on the river. The project seeks to significantly enhance the riverside at Bath Quays. It will create better access and a more beautiful and enjoyable environment for local people and visitors to the city. These improvements will then be complemented and completed by the forthcoming development of the 'Bath Quays' sites either side of the river.
66. The Bath Quays Waterside Project will:
1. Significantly widen the north bank to up to 15m wide at the lower tow-path level between Churchill Bridge and Green Park to move water through this area more quickly in flood conditions. This requires that Green Park Road is diverted away from the riverside northwards to link up with Corn Street creating the major opportunity to open up the riverside to the city.
 2. Replace trees along the southern verge of Green Park Road and along the new road alignment with new planting. There are currently no plans to alter Green Park itself, other than some landscape improvements at the river's edge.
 3. Install new flood walls and raise existing river walls on the south side of the river between Churchill Bridge and Midland Bridge.
 4. Improving flood defenses on existing buildings fronting onto the river along the Lower Bristol Road.
67. The Council and Environment Agency will fund these works (£6.22 million) with a combination of Revolving Infrastructure funding made available by the West of England Local Enterprise Partnership, and Local Levy and Flood Defense Grant in Aid funding.
68. The Environment Agency and the Council are currently working on upgrading and improving Twerton Gate to reduce flood risk to key development sites and existing properties. If this is implemented then this reduces the need for on-site flood mitigation upstream.

The River

69. The importance of the River Avon corridor must be recognised in managing development in this part of the city. The tree lined river corridor is recognised for its landscape and visual contribution to the city and it also supports a variety of wildlife and is designated as an SNCI. As such it is a key component of the District's Green Infrastructure providing benefits for people, place and nature.

70. For much of its length the river comprises a dark tranquil corridor that connects with a network of green spaces and recreational routes in the city. It supports a rich diversity of wildlife, including nationally and internationally protected species for which special protective legalisation applies. The dark; vegetated, and tranquil characteristics of the river are key attributes.
71. The focus for large scale re-development and additional flood alleviation measures in the river corridor brings significant, but not insurmountable, challenges to the planning process and for its long term management and stewardship. Development brings significant pressures for increased lighting and urban public realm and with it the potential for loss of darkness, tranquillity and vegetation. These impacts are managed through the Placemaking Plan policy approach. A **Water Space Study** is also under preparation as a means to guide change, and to provide the framework to deliver sustainable benefits for people, place and nature.
72. The Placemaking Plan addresses the different, and potentially conflicting roles of the river environment, to create a response where the whole is greater than the sum of its parts: A river environment that maintains and enhances its important contribution to the landscape character of the city, that enriches important biodiversity habitats, that transforms our perception of the river as a neglected part of the city, and which is seen by developers and occupiers as an asset to their development sites, and as a key reason to occupy buildings near it. The Natural Environment Evidence Base describes ‘biophilic design’, where incorporation of biodiversity, clean water, and variations in aspect and view can contribute to the wellbeing and productivity of people, thereby resulting in an improvement to the perceived quality of place. In short, the kind of exemplary place that the river environment should be, is good for all of us; good for biodiversity, good for business, good for well-being and good for World Heritage management. This combined approach could best be achieved through the development of a linear river park.

Bath Transport Strategy – ‘Getting Around Bath’

73. Good transport is fundamental to the economic success and wellbeing of the city, and to the ability of residents and visitors to move around. However the volume and impacts of vehicles are undermining the city’s historic fabric and ambience, are detrimental to air quality in parts of the city, and impact negatively on the perception of the place. The historic core of Bath and the city’s key arterial routes in particular, suffer from the intrusion of cars and HGV’s, and the quality of life throughout the city is being adversely affected.
74. In response to this context, the Council adopted the ‘Getting Around Bath’ Transport Strategy in 2014. This sets out the Council’s long term vision for transport, and covers the period up to 2029 to reflect the period for the Council’s Core Strategy and Placemaking Plan.
75. The aim of the Strategy is to support the city’s growth agenda and also improve the environment within the city itself, which can be damaged by the impact of traffic and congestion. The longevity of the Strategy is key to providing a consistent vision for the city and to accommodate the ambitious housing and employment aspirations as set out in this document.

76. The Strategy builds upon existing initiatives, including those delivered through the Bath Transport Package (such as the expanded Park and Ride Sites, Variable Message Signs and improved bus stops with real time information), the EU funded Civitas Renaissance programme (such as Better Bus Area funding), whilst also recognising the importance of Network Rail's electrification programme for the Great Western Main Line.

77. The Transport Strategy for Bath has the following vision:

“Bath will enhance its unique status by adopting measures that promote sustainable transport and reduce the intrusion of vehicles, particularly in the historic core.

This will enable more economic activity and growth, while enhancing its special character and environment and improving the quality of life for local people”.

The reduction of the impact of vehicles is vital in this unique UNESCO World Heritage city and will require a combination of measures. These can be summarised as follows:

- *A walking/cycling strategy to make Bath the UK's most walkable city;*
- *Improved accessibility for people with mobility impairments;*
- *A parking strategy to support the economic growth of the city;*
- *A traffic management plan for the city;*
- *Support for more use of public transport to reduce the number of cars entering the city;*
- *A new Park-and-Ride to the east of Bath, and continuing expansion of the existing Park & Ride (P&R) sites, which can help reduce the demand for parking spaces within the city;*
- *Better management of Heavy Goods Vehicles within the city;*
- *Finding a new location for coaches to park once they have dropped visitors off in the city centre.*
- *Working with the Highways Agency, Wiltshire and other authorities to develop proposals and strategies to remove through traffic and HGVs, in particular, from Bath.*

78. The delivery of the strategy is essential to enable the city to meet its growth objectives and to improve the quality of life within the city. Its delivery will work towards the creation of a city centre that is free of all but essential traffic, and which provides an environment that is attractive for businesses and visitors on which the city's economy relies, as well as for those who live and work in Bath.

79. Its implementation will also help to achieve good air quality; an essential element of an improved environment.

80. The Placemaking Plan seeks to facilitate the ongoing progress made to relocate long stay parking to Park and Ride sites, thus reducing vehicle movements into the constrained city centre. This is a key component of the wider strategy to reduce the impact of traffic in the City, create options for the central area and improve the environment. This works in favour of economic activity and is a more efficient use of scarce space in the centre, presenting opportunities to improve the walking and cycling environment.

81. The Placemaking Plan provides the retention of around 500 spaces within the Central Area which is considered necessary in order to maintain the vitality and viability of the city centre.

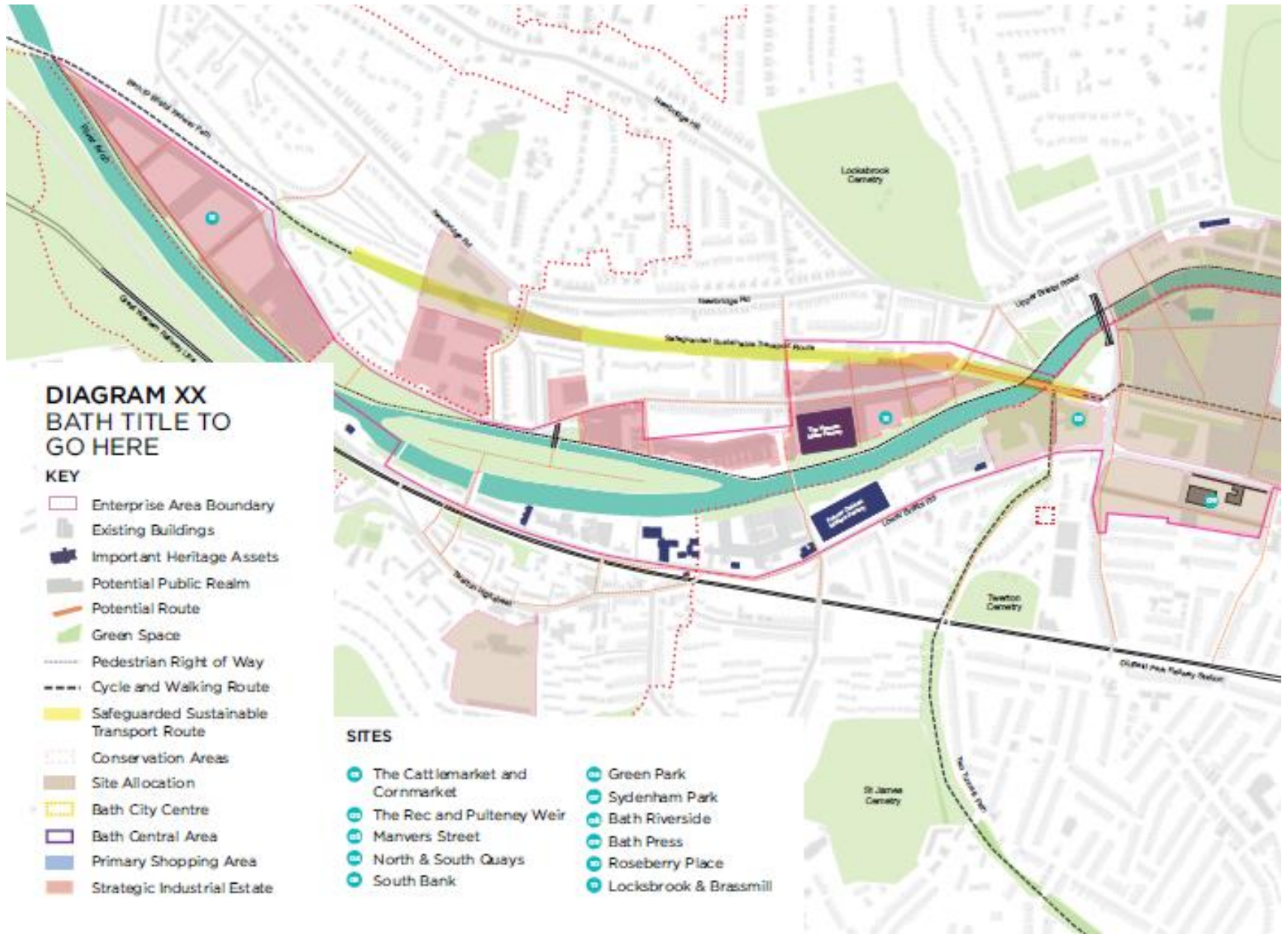
2c The Central Area and Enterprise Area

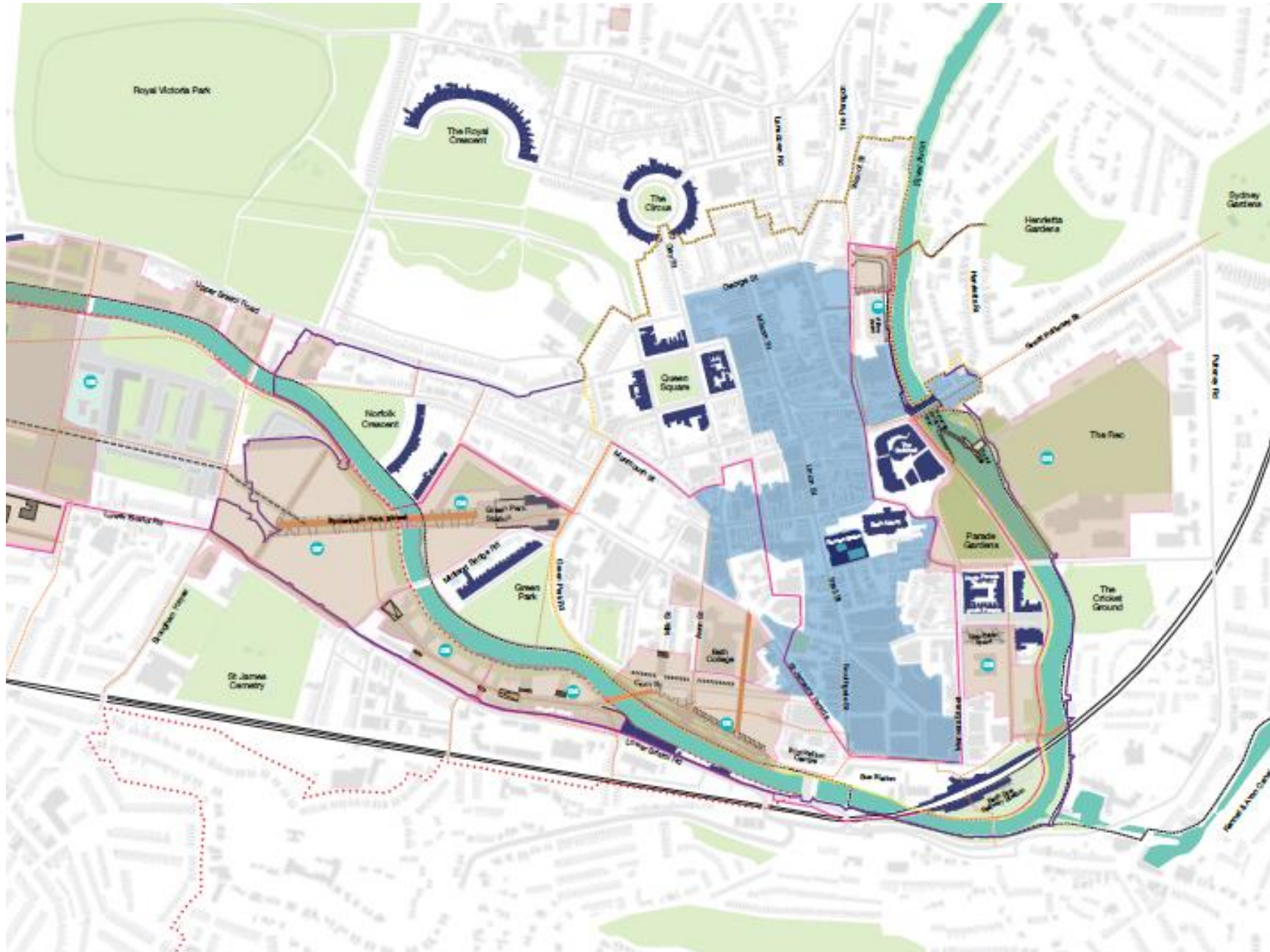
82. The development potential of the Central Area and land either side of the River Avon lying between the Lower and Upper Bristol Roads (A36 and A4) presents the key opportunity for delivering many parts of the vision for the city.
83. The valley floor is the headline development location for Bath; a complex area, where both significant change and conservation is needed. This means realising its economic usefulness and property value whilst protecting heritage assets, responding to character, enhancing recreational potential, managing flood risk, addressing land remediation, improving connectivity and sustaining wildlife habitat.
84. Within this area flood risk is a key constraint which is likely to increase as a result of climate change. A sequential, risk-based approach is taken to the strategy for Bath in accordance with the NPPF. The Central Area and Enterprise Area are regarded as the most suitable location within the District for the scope of activities envisaged. A site specific flood risk assessment must demonstrate that the development within this area will be safe throughout its lifetime without increasing flood risk elsewhere in accordance with the NPPF and Policy CP5 (see infrastructure and delivery section).
85. The Core Strategy identifies strategic policy areas within the valley bottom of the River Avon. It sets out their roles, the scope and scale of change to be achieved and placemaking principles to shape change. The policy areas are:
- The Central Area (comprising the City Centre, South Quays and Western Riverside East)
 - Western Riverside,
 - Twerton and Newbridge Riverside
86. The Core Strategy sets out a clear, firm and enduring vision of change for these areas upon which to base site specific delivery proposals.
87. To support the Core Strategy a Placemaking Plan will be prepared to set out a more detailed planning and design framework for specific sites within the Central Area, the Enterprise Area and elsewhere in the city. This will provide a vehicle for resolving contentious planning issues for key areas where the change is envisaged.

The Placemaking Plan will:

- Establish the potential use of individual sites and set out sustainable design principles
- Resolve conflicting objectives in areas subject to development pressures
- Protect environmental assets particularly sensitive to change
- Help to stimulate development and enable the delivery of planned growth and economic potential
- Act as a focus and a catalyst for key agencies and landowners to work together

Diagram 6, 7, 8A and 9 to be replaced by the Diagram on pages 28 & 29





Text shaded grey is from the adopted Core Strategy not part of the consultation.

The Central Area

88. The Central Area of Bath lies at the heart of the World Heritage site and much of it lies within the Bath Conservation Area. The Central Area comprises the city centre and neighbouring locations to the south and east. A key objective of the plan is for the city centre to expand to encompass the entire Central Area. The precise extent of the city centre boundary is identified on the Policies Map. This boundary will be reviewed every 5 years based on observable change.

POLICY B2 Central Area Strategic Policy

1. The Role of the Central Area

Change within the Central Area should improve Bath's profile and performance as:

a: An important cultural asset for the world.

b: One of the country's most desirable and beautiful places in which to live and work.

c: A more dynamic place for business, enterprise, creativity and innovation.

d: An attractive centre for shopping, leisure and recreation.

e: A spa town that inspires, relaxes and entertains.

f: A visitor destination of international renown.

g: A place that connects people to the natural environment.

h: A place to, and in which people increasingly travel by walking, cycling or by using public transport.

2. Placemaking Principles

Change within the Central Area should reinforce and contribute to the City's unique character and identity.

Assets of the Central Area

The following characteristics combine to provide an exceptional urban environment. Development proposals must demonstrate that they have been inspired and shaped by these characteristics. The Placemaking Plan will set out how the redevelopment of specific sites can respond to these characteristics:

a: There are many areas of exemplary urban design where the relationship between buildings, streets and public spaces presents a high quality environment for people to enjoy.

b: The urban landscape of streets, blocks and plots within the core of the city is of a fine and characteristic grain and contains a high proportion of listed buildings.

c: There are extensive areas of high quality architecture where individual buildings (in terms of height, scale, massing and architectural treatment) combine to form a

harmonious townscape ensemble.

d: The limited palette of materials and the quality, detailing, skill of craftsmanship and authenticity of construction presents a coherent and high quality finish to the urban scene.

e: Many buildings have a proven track record as being adaptable to a range of uses over time.

f: There is a strong visual relationship between the built environment and its landscape setting providing many glimpses and views, out of, within and into the Central Area.

g: The Central Area enjoys good proximity and connectivity to high quality urban parks and waterways for recreation. These also make walking and cycling to and from the Central Area an attractive option.

h: The River Avon and its banks are of nature conservation value and provide important bat foraging corridors and opportunities to connect people to the natural environment.

i: The compactness and continuity of the primary shopping area, high representation of independent, specialist and multiple retailers amongst high incidence of historic shop fronts are key strengths.

j: The prevalence of active street frontages contributes to lively streets and public areas.

k: There are a wide range of uses and activities within a walkable distance from each other and the bus and rail stations.

l: A series of public spaces allow for temporary uses such as festivals, markets and events which contribute to the cultural identity and local economy of the city.

m The city centre maintains a 'lived in' feel due to the number of residences both within and adjoining the city centre.

Risks to the Central Area

The following issues are identified as key risks to enhancing the function and appearance of the Central Area. Development proposals must, where possible, address these issues:

n: There are areas of poor quality post war development which have disrupted and fractured the urban grain. A number of these result in underutilised and poorly connected areas of riverside, within or having a relationship with, the Central Area.

o: There are areas where the river acts as a barrier to pedestrian and cycling desire lines and further crossings would be beneficial in enabling sustainable transport choices and for the enjoyment of the city.

p: The poor quality of much of the public realm has a negative impact on the experience of the city centre, the World Heritage Site and Bath's external image.

q: The volume of traffic harms the environmental quality of a number of streets and spaces and impedes the movement of pedestrian and cyclists. It therefore acts as a barrier to the expansion of a walkable city centre.

r: Whilst the incidence of independent and local retailers remains high compared to other centres, there has been a slow decline in their presence.

s: There is limited capacity on the highway network to absorb increased motorised travel.

t: Congestion reduces the reliability of public transport to and from the Central Area.

u: Parts of the Central Area fall within flood zones 2 and 3a (See 'Infrastructure and Delivery') and this affects a number of key development opportunities (see B1.3)

v: A lack of flexible modern offices and other workspaces and an over reliance on Georgian office space impedes productivity, economic growth and diversification.

w: The building stock of the Central Area is energy inefficient.

3. Key Development Opportunities

Figure 7 illustrates the general extent of the city centre, identifies neighbouring areas with the most capacity for significant change and key regeneration opportunities. The precise extent of the city centre, including that of the primary shopping area is shown on the Policies Map (see Appendix 3). Within the context of the NPPF, economic development led mixed use development proposals at the following locations that accord with parts 1 and 2 of Policy B2 and contribute to the scope and scale of change listed in part '4' of this policy will be welcomed.

City Centre

a: North of Pulteney Bridge (Cornmarket, Cattlemarket, Hilton Hotel, and The Podium).

b: Manvers Street Car Park, Avon & Somerset Police Station and Royal Mail Depot area.

c: Green Park Road (Green Park House).

d: Bath Quays North (Avon Street Car and Coach Park and City College).

e: Kingsmead (Kingsmead House, Telephone Exchange, Plymouth House and land in the vicinity of Kingsmead Square).

Neighbouring the City Centre

f: Bath Quays South (Stothert and Pitt to Travis Perkins).

g: The Green Park Station area.

h: The Homebase area including the Pinesway industrial estate and gyratory.

4. Scope and Scale of Change

The key activities to be accommodated within the Central Area are:

a: Small to medium sized comparison retail development where this retains a compact and continuous primary shopping area.

b: A net increase of about 40,000 sq.m of modern office and creative workspace, to enable the growth of sectors targeted in the Economic Strategy.

c: 2,000 sq.m of convenience shopping space to address the overtrading of existing stores.

d: Manage the delivery of 500-750 hotel bedrooms to widen the accommodation offer of the city, increase overnight stays and the competitiveness of the city as a popular visitor destination.

e: About 500 additional dwellings as part of mixed use schemes on the key redevelopment opportunities that have been identified.

f: A rejuvenated public transport interchange including improvements to Bath Spa Rail Station.

g: A comprehensive programme for public realm enhancement and implementation of a Wayfinding and City Information System.

h: Existing uses within the Central Area that remain compatible with its future role and the scope and scale of change envisaged for it, should, where appropriate, be reincorporated as part of redevelopment proposals, unless this is not viable or would significantly reduce the capacity of the Central Area to accommodate jobs or housing development. In such circumstances reasonable efforts should be made to ensure such uses are relocated elsewhere.

i: A cultural / performance / arts venue.

j: The retention and enhancement of leisure facilities.

k: Major riverside access and habitat enhancements.

The Central Area in 2029

89. The implementation and delivery of this strategic policy over the lifetime of the Core Strategy will mean that the Central Area will have changed by 2029 as set out in Diagram 8. It is anticipated that the extent of the city centre boundary will expand westwards as key development sites within the existing city centre and edge of centre areas are redeveloped to fully optimise their locations and generate more intensive activity.
90. The Central Area is intensified and rejuvenated and the extent of the city centre uses now stretches across the River Avon. The area is perceived as a total composition. New mixed use schemes complement the character and economic function of the core, contributing to lively streets, spaces and riverside areas, creating 'stepping stones' of activity that serve to connect the Central Area with Western Riverside. The historic core of the city centre is seamlessly connected to new development areas to the south and west.
91. The city centre is predominantly car free and is served by an integrated access, movement and wayfinding system. Bespoke projects have upgraded the public realm and combine with high quality new development to enhance the identity and competitiveness of the city as a whole. A network of urban spaces and an expanded set of pedestrian circuits encourage wider circulation within an expanded city centre. This network supports retail and cultural activity and connects to a wider network of heritage and cultural attractions, parks and gardens, and beyond to surrounding residential neighbourhoods.
92. The River Corridor is a key element of the experience of the city. It offers a continuous pedestrian route with frequent access points, a series of new and enhanced pedestrian bridge crossings and a variety of well-connected river corridor spaces and character areas which contribute to the green infrastructure and ecology of the city and offer a range of recreational opportunities.

Diagram 8 – THE CENTRAL AREA in 2029

Walcot Street / Cattlemarket Site



Cattlemarket, Cornmarket & Hilton Hotel

Context

93. Located on a key route into and out of the city centre, the Cornmarket the Cattlemarket site, and at some point in the future, the Hilton Hotel, provide significant opportunities to remodel the fabric of this area, providing a more engaging experience that seamlessly integrates the whole of Walcot Street into the city centre. river and street frontage and their key features are as follows: REF TO CACA

- **Cornmarket:** The two storey former Cornmarket Building is Grade II listed, and is a Building at Risk due to its poor structural condition. It is also vacant. See list description *here*.
- **Cattlemarket:** This former cattlemarket has been used for decades as a surface level car park, and it continues to hold a market use on part of the site every Saturday. It is a complex and diverse site with river frontage, and historic vaults underneath a significant portion of the site which are used by bats, including species linked to the Bath and Bradford on Avon Bat SAC. The archaeology in this area is significant, and there are likely to be contamination and structural issues associated with redevelopment proposals. The site sits at a key ecological node, and is a key section of a dark habitat corridor.
- **Hilton Hotel:** Despite being a very successful hotel, this is a building of poor aesthetic quality with a negative relationship to its context. Its redevelopment has been an aspiration for a considerable time, but its economic value as a successful hotel has worked against the viability of any proposed schemes. However, future opportunities for

redevelopment or remodelling will in principle be supported, and proposals could extend further south to include all or part of the existing library.

Vision

94. For many years, this site has been an eyesore in this part of the city centre. The site benefits greatly from the vibrancy of the weekly Saturday market and by the expansive views over the river towards the hillsides to the east. There is also a healthy footfall from pedestrians coming into the city centre from the east.
95. The imaginative re-use of this site provides a long overdue opportunity to repair the gap in one of Bath's most diverse and visually distinct streets. The historical and ecological interests should drive the form, detail and function of the site. Development should integrate with the historic environment, and make an exceptional response to a challenging and complex site. The repair and re-use of the Cornmarket building is required, and opportunities to reinforce the important role of the vaults as an important bat habitat linked to the river, should be embraced.
96. Walcot Street is well known for its vibrant mix of small scale, independent businesses, which contribute so much to the appeal and identity of this part of the city. The development of this site provides the opportunity to add to this diversity, and provide a mix of business space to support the growth of this important sector. Reference should be made to the Council's Supplementary Planning Document, 'Walcot Street Works'; a Character Assessment and Principles for Development.

Policy SB1: Development Requirements and Design Principles

Development across the whole site will be expected to:

- 1. Provide a fine grained, mix of uses that reflect the diverse and varied nature of Walcot Street, containing units of varied size and tenure. This is to comprise:***
 - a. Retail space that reinforces the important character of Walcot Street;***
 - b. B1 workspace***
 - c. A3 food and drink uses, including creating opportunities for outdoor tables and chairs , which may be particularly suited to the Cornmarket building and associated vaults.***
 - d. A residential element, to include affordable housing.***
 - e. The retention of adequate and suitable space for use by a market, if viable.***
 - f. Other city centre uses that contribute to the rich mix of uses in the area.***

It will not be acceptable for individual elements of the site to come forward where they may prejudice this overall requirement for a mixed use development.

- 2. Repair the broken street frontage of Walcot Street by re-establishing the historic building line. Behind the Walcot Street frontage, developers are invited to provide an engaging and varied architectural response that enhances the diverse built character and riverside setting of the area.***
- 3. Be designed so that the frontage building onto Walcot Street is flanked by two streets, one adjacent to the Cornmarket building, and the other adjacent to the Hilton Hotel. The latter should provide for revised egress from the Podium multi-storey car park, and if feasible,***

service access to and from Waitrose. The streets will provide views of the river corridor and the hillsides beyond, and provide pedestrian access to the riverside walkway.

- 4. Undertake associated public realm works to Walcot Street and the public realm within the site in accordance with the Bath Pattern Book.*
- 5. Respond to the important views related to the site and to the general character of the area. An analysis is therefore required to inform the height, massing and design of buildings. The Bath Building Heights Strategy should be used as part of the evidence base and the starting point for this analysis. This identifies this site as being within zone 1 – the Georgian City, and recommends that for new development ‘the overall height should not be less than or exceed the overall prevailing height of nearby Georgian buildings.’ (Note that this is a recommendation for the general height only and is subject to modifiers). This Bath Building Heights Strategy will apply in particular to the frontage of this site, and the appropriate building heights elsewhere will be informed by the analysis described above.*
- 6. Conserve and retain the whole of the Cornmarket Building, and provide a public space adjacent to it. This public space should relate to, and interact with the ground floor of the Cornmarket building and uses within, and have a positive but sensitive relationship with the vaults beneath part of the Cattlemarket Site, and with the river corridor.*
- 7. Embrace the existing function of the vaults as a bat roost, and deliver imaginative and compatible re-use of the vaults.*
- 8. Explore opportunities to facilitate the redevelopment or remodelling of the adjacent Hilton hotel site (which could in principle extend to include the Podium development), within a comprehensive redevelopment proposal. Should this be achieved then the retention of hotel bedspaces and additional retail floorspace within the wider site and as part of a mixed use scheme, will be supported. The other principles here would also apply.*
- 9. Restore and enhance the biodiversity value of the river and the river edge by retaining and enhancing the green edge to the riverside, and ensuring the provision of a dark corridor to the river to enhance conditions for bats.*
- 10. Provide a riverside walkway that connects to the existing and adjacent riverside walkways. This will enable the provision of a continuous riverside walkway from Pulteney Bridge northwards. It will require sensitive and appropriate lighting solutions to retain the existing dark corridor.*
- 11. The potential of a new pedestrian and cycling bridge over the River Avon to provide additional choice of routes through the city should be explored, and will be supported in principle.*

Central Riverside & Recreation Ground



Context

98. This area immediately to the east of the city centre, comprises open spaces, buildings and uses that are almost exclusively related to sports, recreation and leisure activities. It is in contrast to the more built up and commercial character of the city centre; it is a place where people relax and recharge, take exercise, play sport, or watch rugby.

99. The views available are varied, with certain locations providing spectacular views including from:

- Grand Parade over the river to Widcombe, Bathampton Downs, the folly of Sham Castle, and the green hillsides beyond;
- from North Parade Bridge to Pulteney Bridge and from the river walk, and
- from the Recreation Ground to the Abbey.

100. The iconic view of the formal Pulteney Bridge with the river running beneath is a dramatic example of the contrast between the built and natural environments that is an important aspect of the city's character.

101. This area comprises a wide range of historic and modern buildings, land uses and ownership structures. The Council will work with key stakeholders to help to bring forward individual projects that result in positive change; each contributing to the significant potential of the wider area. Emerging projects will be guided by the relevant development

and design principles that provide the overarching planning policy framework to manage change.

102. The area falls largely within Flood Zone 3a and 3b and functions as an important storage area during flood events. Therefore any built development proposals would need to ensure that proposals coming forward are safe, do not result in a net loss of floodplain, and do not result in an increased flood risk elsewhere.
103. Policy B1(8)b from the Core Strategy has established the policy context for the Recreation Ground, and subject to the resolution of any unique legal issues and constraints, it will enable the development of a sporting, cultural and leisure stadium.

Vision

There are a number of interrelated projects that have enormous potential to re-energise and re-define the important role and function that this area can play as a recreational heart to the city: A place that will have the river at its centre, and will act as a forum for leisure, sport, recreation, wildlife, entertainment and culture. It can comprise of:

- *A 21st century re-interpretation of the historic 'pleasure garden' of Harrison's Walks (now Parade Gardens);*
- *An inspirational setting for the development of a new sporting, cultural and leisure stadium that safeguards the valued assets and attributes of the World Heritage Site, including key views;*
- *The provision of an enhanced green infrastructure throughout the area, including improvements to the important biodiversity role of the river and the riverside;*
- *Potentially, an enhanced role as a point of access into the central area.*

As part of this, there are significant opportunities to transform the visual and physical connectivity of this area to its surroundings and these will be strongly encouraged provided they protect and enhance the Outstanding Universal Value of the World Heritage Site.

Specific measures include:

- *Improving the connections from the streets and spaces of Terrace Walk, Orange Grove and Grand Parade, including the Colonnades into Parade Gardens and to the riverside;*
- *Transforming the existing links from Pulteney Bridge and North Parade Bridge to a remodelled riverside path on the east side.*

Policy SB2: Development Requirements and Design Principles

These will apply to the consideration of development proposals within this area.

Riverside West (Parade Gardens, Terrace Walk, Orange Grove, Grand Parade)

- 1. The creative reuse of the voids underneath Grand Parade and Terrace Walk including the provision of radically improved public access to Parade Gardens and to the riverside.***
- 2. The potential of an appropriate new building for cultural uses in front of Terrace Walk will be considered, subject to a thorough sensitivity analysis, including the importance of the vista to Sham Castle from Ralph Allen's Town House,***
- 3. Improving access to the river edge from Parade Gardens, enhancing the view corridor to***

Pulteney Bridge and reinforcing the biodiversity value of the river edge.

4. Connecting the area underneath Grand Parade to Slippery Lane, subject to the consideration of impact on the character of surviving historic fabric,

The River

1. Working with key stakeholders, delivering the removal of the radial gate and facilitating the creation of a high quality public space that enhances the setting of Pulteney Bridge, improves safety for users of the riverside path, and improves the ecological value and function of the river.

2. Development proposals will be expected to protect existing and where practicable provide for improved habitats, along the river edge.

3. Lighting at this location needs to be designed to be responsive to the important ecological function of the river corridor, particularly in relation to bats.

4. Improving the experience for pedestrians and cyclists along the riverside, ensuring that access is safe, comfortable and enjoyable.

Riverside East (The Rec, including Bath Rugby Club, Bath Sports and Leisure Centre, the Pavilion, and other associated areas)

1. The preparation of a Development Brief, in conjunction with stakeholders, the local community and statutory consultees, will provide the detailed framework which will enable the development of a permanent sporting, cultural and leisure stadium, in accordance with Core Strategy policy B1(8)b.

2. The design will respond appropriately and creatively to its sensitive context within the World Heritage Site, including the importance of open views from Grand Parade, Orange Grove and Terrace Walk to the hillsides beyond, and the iconic view from North Parade Bridge to Pulteney Bridge and Weir.

3. Development proposals will enhance and intensify the leisure offer with more variety and year round use.

4. The safety and convenience of vehicular access to and from the Rec will be improved.

5. Ensuring landscape, tree planting and public realm enhancements along the river corridor contribute positively its character, and that development alongside the riverside provides a positive relationship to it.

6. Where practicable, introduce measures that enhance Green Infrastructure including the biodiversity and character of the river, and the provision of habitats for important species. It is requirement for a biodiversity study to be commissioned to inform the development of a new stadium, and this should consider the impact of lighting, particularly in relation to bats.

7. Providing the opportunity for the leisure centre to be refurbished and improved.

8. In discussion with landowners explore options for parking in this area or on adjacent sites.

9. Ensure no net loss of floodplain storage

Manvers Street



Car Park, Police Station and Post Office sites

Context

104. This area comprises a number of sites extending from the Grade 1 listed South Parade towards the Bath Spa Railway Station, and lying between Manvers Street and the river. It is part of the Enterprise Area, and forms the setting for the Grade 2* listed St John's Church, and contains the listed Old Post Office Sorting Office. The wider area contains other listed buildings such as Bayntun's Bookshop and Manvers Street Baptist Church.
105. It is an area in very close proximity to the train and bus station, and Manvers Street is a key pedestrian route and entrance into the city.
106. There are a number of poorly designed buildings and spaces that detract from the image and identity of the area. This site is partly within FZ1, FZ2 and FZ3a and the risk of flooding will be increased taking into account climate change. Therefore the floor levels have to be raised at the appropriate level taking into account the vulnerability classification informed by the site specific FRA. The mitigation measures are provided through the Bath Quays Waterside Scheme.

Vision

- *This area will be transformed into delivering a new mixed use commercial quarter for the city that optimises the very close relationship to Bath's main public transport interchange.*
- *It will help to positively transform Bath's reputation as a destination for businesses and visitors, and express the city's commitment for delivering its vision. The image and identity of the place must appeal to the target sectors for economic growth as identified in the Economic Strategy.*
- *It will provide a significant new public space, that:*
 - *Creates a new destination for the general public;*
 - *Showcases the architectural significance of South Parade to Bath on a key arrival route into the city;*
 - *Respects and maintains the important setting of South Parade and its relationship with the landscape beyond, including Prior Park and Beechen Cliff.*
 - *Provides an impressive setting for St John's Church*

Policy SB3: Development Requirements and Design Principles

Development proposals, whether delivered individually or comprehensively, are required to comply with the following principles:

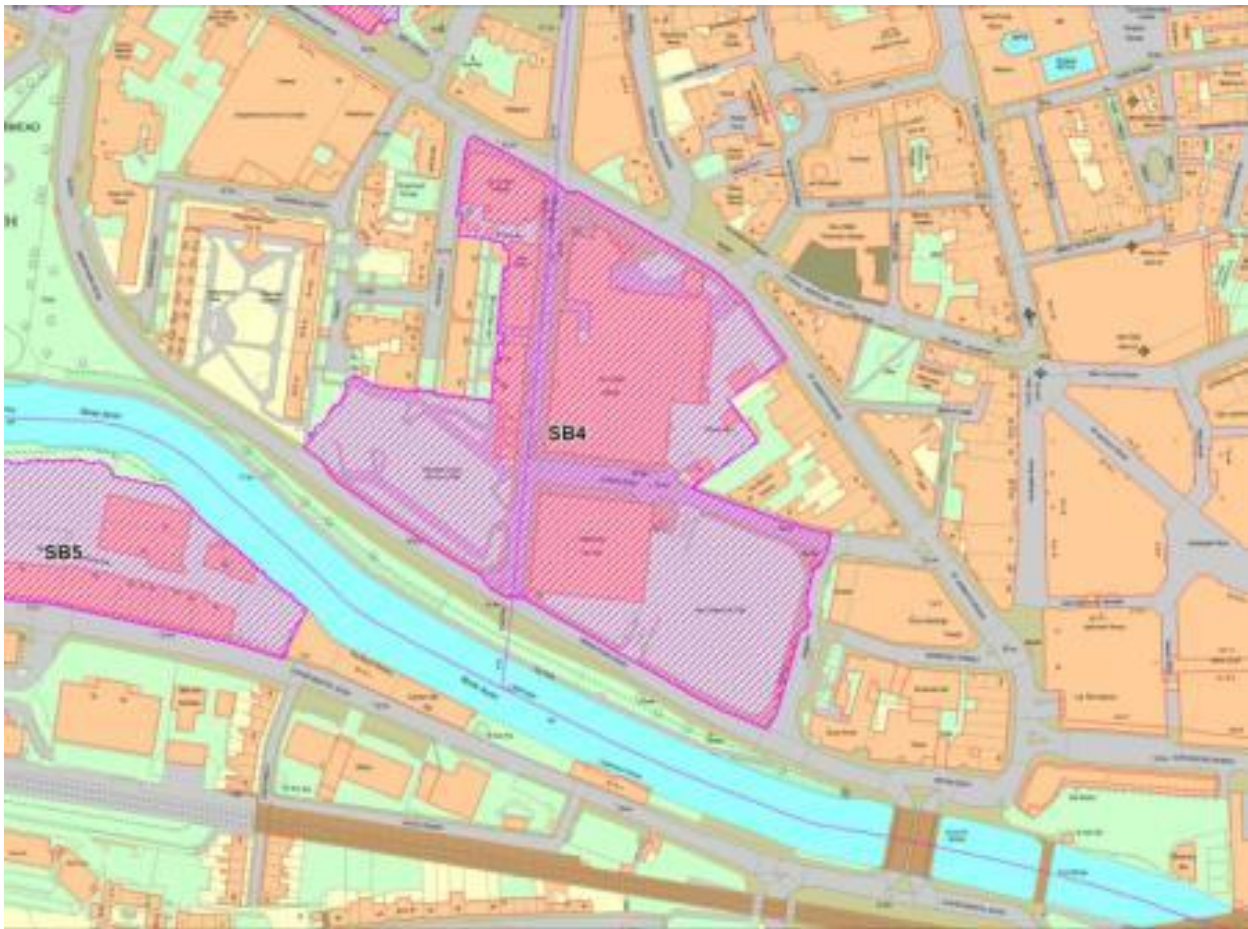
- 1. Provide a varied, mixed use economic development-led area that reflects the diverse and finer grained buildings within the city centre.***
- 2. The mix of uses should contribute positively to the vibrant character of the city centre. Development proposals are expected to contribute towards delivering the city's need for additional employment floorspace, residential uses, with the provision of a new hotel. A minimum of 9,000 sq.m. gross of office floorspace is to be provided across the allocated site, and a minimum of xxx residential units are to be provided. Other uses complementary uses such as retailing and car parking underneath the new public space will in principle be supported subject to their positive response to other relevant policies within the development plan. Student accommodation on this site is not acceptable as it will impede the delivery of other Council objectives.***
- 3. The urban design/architectural approach of development proposals should respond to the variety of contexts within the site:***
 - a) Development must respond to the setting of South Parade, including its relationship to Beechen Cliff and Prior Park, and to the setting of St John's Church. This will result in a public space being formed in front of South Parade, which in turn will inform the design and arrangement of buildings on the site in order to maintain these views. There are opportunities, subject to archaeological considerations and any risks to the Bath Hot Springs, for below ground level development and/or low height pavilion buildings on the existing Manvers Street Car Park.***
 - b) Fronting Manvers Street and South Parade: The priority is to repair the image and identity of Manvers Street. New development needs to add to the character and grain of this part of the city centre, whilst repairing and reinforcing the sense of Manvers Street as a street. This is likely to lend itself to buildings that tend to be fairly formal or regular, and which are based on an ethos of simplicity and pared back design that reflects the design ethos of John Wood's Parades. There is also scope for***

exceptional individual buildings to add to the architectural variety that already exists in the street such as Bayntun's and Manvers Street Baptist Church. Active uses should front onto Manvers Street and the new public space.

- c) Within the site and facing the river and railway line there is the capacity for a contrast of architectural expression, with a strong potential for a different approach to appeal to different users/occupiers. This needs to be within the confines of the dominant building height of South Parade, and creating a positive response to the townscape and public realm.**
- 4. Buildings should mend the broken townscape rather than be 'landmark' buildings; simplicity of plan layout and development form are key principles.**
 - 5. The design of the development, in particular its roofscape must be sensitive and responsive to its prominence when seen from Beechen Cliff and from other surrounding hillsides.**
 - 6. Design should respond to the important views related to the site and to the general character of the area.**
 - 7. The building height of South Parade, and the relationship of South Parade to the wider landscape, will strongly influence the appropriate building height of new development and its location. An analysis is required to inform the height, massing and design of buildings. The Bath Building Heights Strategy should be used as part of the evidence base and the starting point for this analysis. This identifies this site as being within zone 1 – the Georgian City, and recommends that for new development 'the overall height should not be less than or exceed the overall prevailing height of nearby Georgian buildings.' Note that this is a recommendation for the general height only and is subject to modifiers.**
 - 8. Bath stone should be the dominant building material in the area to respond to the homogeneity of the city centre.**
 - 9. A north-south street must be provided through the development area that is aligned to Duke Street and which is directly connected through to Railway Place. To improve circulation and access this is to be designed as a shared space that can also allow limited vehicular access to the Railway Station.**
 - 10. An east-west axis should be provided that connects the current Royal Mail route from Manvers Street to the riverside to improve visual and physical connections to the river edge.**
 - 11. A new pedestrian and cyclist bridge should be considered that connects this site with the residential community beyond.**
 - 12. Secondary (more intimate) public spaces/streets should be created within the site, particularly on the riverside.**
 - 13. The design of the streets and spaces associated with the development is to respond to the Bath Pattern Book, and will be implemented by the developers of the sites.**

- 14. Measures should be introduced that enhance Green Infrastructure, taking into account the potential of extending and creating new green infrastructure networks, including measures to restore and enhance the biodiversity value of the river and the river edge, and retaining a dark corridor for bats. It is a requirement for a biodiversity study to be commissioned to inform the development of the site.***
- 15. The finished floor levels of development will need to be raised to above safe flooding levels taking into account the vulnerability classification informed by the site specific FRA This will require careful design solutions to maintain appropriate relationships between buildings and the adjacent public realm.***

Bath Quays North & Bath College



Bath Quays North and Bath College Sites

Context

107. Lying immediately to the south west of the city centre, just outside the former city walls, this prime development area represents a significant opportunity to provide an expanded city centre to meet the demands of a growing city. It is currently occupied by a number of sites including one of Bath and North East Somerset Council's main public car parks, the Council's main coach park, and Bath College. It has an enviable river frontage, overlooking the former wharf buildings and with the striking backdrop of Beechen Cliff, and is a few minutes' walk away from the city's main railway station.

108. As a result of its history, the nature of its redevelopment during the 1960s, the dominance of poor quality buildings and the highly visible car and coach parks, it is an area that feels fragmented and cut off from the city's core. It currently fails to make the most of its assets and contributes negatively to the character of the conservation area and to this part of the world heritage site.

Bath Quays North

109. The redevelopment of this site is the Council's flagship regeneration project; it will be an area that will be transformed into the city's main business location, and will help to redefine the city's economic profile.

110. A new pedestrian and cyclist bridge is being commissioned that promises to be a beautiful addition to Bath's cityscape. It is to be located and orientated to optimise pedestrian and cyclist movement between the city centre, this site and the regeneration opportunities and neighbouring communities south of the river. This significant regeneration investment is also being funded using West of England Local Enterprise Funding.

Bath College

111. The newly merged Bath College has set out its ambition and vision for the future of its city centre campus. Relevant extracts from their Estates Strategy (2015-2020) as they relate to the development opportunities on the Bath College site are reproduced below, and the full document is available here [INSERT HYPERLINK]. Their vision is closely aligned to the wider aspirations of the Council, and in particular to the development potential and placemaking considerations related to the regeneration of the Bath Quays North site. It is therefore in principle, fully supported by the Council.
112. This site is partly within FZ1, FZ2 and FZ3a and the risk of flooding will be increased taking into account climate change. Therefore the floor levels have to be raised at the appropriate level taking into account the vulnerability classification informed by the site specific FRA. The mitigation measures are provided through the Bath Quays Waterside Scheme.

Vision

Redevelopment will deliver a new mixed use quarter that connects the heart of the city to a vibrant and remodelled riverside environment, whilst respecting the sensitivity of its wider urban context. Its proximity to the city centre, its backdrop and south facing orientation make this one of the most exciting riverside regeneration opportunities in the region.

A key requirement for this wider area is for it to be stitched back into the city centre; repairing its damaged urban grain. It will form part of an expanded centre with the social, cultural and economic activity and ambience that this entails. It will provide a pedestrian dominant environment that connects the city centre directly through to the riverside edge and beyond to the surrounding communities via a beautiful new pedestrian and cycling bridge. To achieve this effectively requires skilful placemaking and partnership working with adjoining landowners, notably Bath College, to create the conditions for its regeneration and its successful operation as part of an expanded centre.

Bath College

113. In accordance with their vision, it is anticipated that development of parts of the Bath College site will come forward during the plan period. This provides the opportunity to deliver up to 16,000sqm of floorspace related principally to teaching, learning and skills development, in addition to business floorspace. Redevelopment of their car park and the existing single storey element of their site will enable the provision of the key pedestrian route through the site that connects the city centre to the Bath Quays North site and the remodelled riverside.

Policy SB4: Development Requirements and Design Principles

Development proposals will be subject to the following development requirements and design principles:

On Bath Quays North deliver an employment led mixed use development that

contributes positively to the vibrant character of the city centre. Development proposals are expected to deliver around 30,000 sq.m. (gross) of new floorspace which will contribute towards delivering the city's need for additional employment floorspace and residential uses in particular. A minimum of 20,000 sq.m. gross of office floorspace is to be provided across the allocated site, and a minimum of 70 residential units are to be provided. Student accommodation on this site is not acceptable as it will impede the delivery of other Council objectives.

Other complementary uses such as retailing (A1), A3 and A4, and below ground car parking will in principle be supported subject to their positive response to other relevant policies within the development plan.

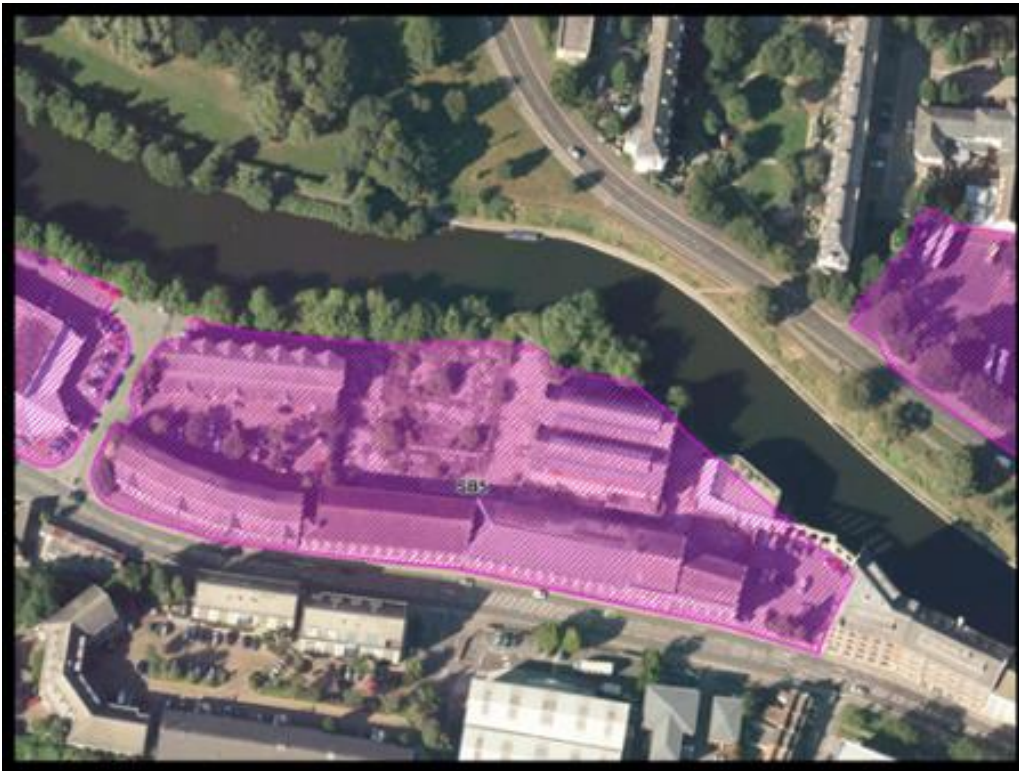
The Bath College site is protected primarily for educational purposes, although opportunities for business accommodation that reflect the aspirations of the college to integrate the campus into Bath's Enterprise Area, and which help to enable delivery of the principles as set out above, will be supported. Should it be demonstrated that parts of the site are no longer required for educational or related purposes, the site will be expected to deliver mixed use development appropriate to its proximity within an expanded city centre. Active uses are required to be provided alongside the key route through the site.

- 1. The network of streets and spaces throughout the wider site should be experienced as a natural extension of the city centre. They should be legible, pedestrian and cycling friendly, connecting the city centre to the riverside path and cycle route, and directly aligned to enjoy views of the hillsides beyond. Therefore a new street pattern is to be established throughout the area that connects the existing streets and spaces within the city centre directly to the riverside. This will require a new street to be created through the Bath College site. The number of streets through the area is to be maximised to provide a pedestrian friendly environment whilst enabling appropriately sized development blocks.**
- 2. Development must have a positive relationship with the adjacent public realm at ground floor level, especially on key routes through the area. The number of main entrances onto streets must be maximised in order to create an active, human scale public realm. The Concept Diagram illustrates the network of streets to be provided.**
- 3. New streets and spaces throughout the area are required to be implemented by the developer/s, and are to be in accordance with the relevant typology as set out in the Bath Pattern Book.**
- 4. The development of this area must comprise of mixed use blocks. To successfully integrate into the city centre, the developments must also accommodate a range of city centre uses, particularly on the ground floors**
- 5. Development will generally be of a finer grain, reflecting the dominant characteristics of the wider city centre, including mix of tenures and ownerships. Development will be designed to host a wide range of businesses, and a rich mix of uses. Developments must present an active and engaging street frontage, particularly on key routes. This is in contrast with the larger format buildings in the immediate vicinity of the site, which typically contrast with these characteristics of the city centre.**
- 6. The design of new development, including materials and visual appearance, should**

resolve the considerable challenge of creating a confident and contemporary identity for this area, one that:

- a. responds positively to the existing, varied architectural character of adjacent sites;**
 - b. responds to the valued characteristics of the city centre, and to the wider context of Bath as a World Heritage Site as expressed through its Outstanding Universal Value.**
- 7. Development should not detract from important views over the site and should respond appropriately to the general characteristics of buildings heights within the city. An analysis is required to enable an appropriate response, and to influence the height, massing and design of buildings. The Bath Building Heights Strategy should be used as part of the evidence base and the starting point for this analysis. This identifies this site as being within zone 1 – the Georgian City, and recommends that for new development ‘the overall height should not be less than or exceed the overall prevailing height of nearby Georgian buildings.’ The nearest Georgian buildings are located on St James’s Parade and at Green Park. Note that this is a recommendation for the general height only and is subject to modifiers.**
 - 8. The design of the development, in particular its roofscape must be sensitive and responsive to its prominence when seen from Beechen Cliff and from other surrounding hillsides, including during hours of darkness. There are opportunities for roofs to be used for rainwater storage and capture, for solar cooling, power and for edible gardening, and this mix of functions can help to reduce a monolithic appearance.**
 - 9. The creation of an enhanced riverside environment associated with the implementation of flood conveyance measures provides the context and the opportunity for development to make this into a key city centre destination. Imaginative responses that integrate, and contrast, the qualities of the natural environment with the built should be proposed, including opportunities to enhance biodiversity habitats and connections by linking the river bank and flood defence scheme with Green Park. The lighting of buildings and the associated public realm will be a key consideration in relation to bats.**
 - 10. Car parking – assess the number of car parking spaces to be retained on this site as part of the analysis of the need to retain 500 public parking spaces within the Enterprise Area to maintain the vitality of the City Centre economy and to encourage modal shift, as proposed in the Transport Strategy.**
 - 11. Cycling – each individual development block should provide well designed, secure, convenient and easy to access cycle parking and storage for the use of their occupants**
 - 12. The redevelopment of this site requires the current coach parking and drop off facility to be provided in an alternative location. Should this not prove possible, then a coach drop off area will need to be provided as either an interim measure, or as part of the redevelopment of the wider area.**
 - 13. The finished floor levels of development will need to be raised to above safe flooding levels taking into account the vulnerability classification informed by site specific FRAs. This will require careful design solutions to maintain appropriate relationships between buildings and the adjacent public realm.**

South Quays & Riverside Court



South Quays and Riverside Court

Context

114. Located to the south west of Bath City Centre, this area comprises the vacant South Quays site and the Riverside Court office site. They lie between the River Avon to the north and the Lower Bristol Road to the south. There are important views through and over the sites from many directions. The area and its immediate context is made up of a variety of buildings and built forms, which are of different ages. They are typically of larger scale, massing and at a range of heights, and typically contain a variety of commercial uses. Beyond the site to the south, lie the residential areas of Oldfield Park, Holloway, and Bear Flat.
115. Buildings in the vicinity tend to form bold relationships with their surroundings; butting up to the river's edge at the eastern end of the South Quays site, and forming a strong edge along the Lower Bristol Road. Many of these represent an important part of Bath's industrial heritage, notably the Grade II listed Newark Works, curtilage listed buildings such as the Foundry, and the associated public realm. This site was previously occupied by innovative crane manufacturers, Stothert and Pitt.
116. There is a variety of landscape treatment to the river edge in this area; from the softer vegetated river edge by Riverside Court, the open hard quayside edge related to the historic industrial uses at Newark Works, to the hard edge formed by a series of buildings and walls further to the east.

117. Flood mitigation measures to be undertaken in this area as part of the Bath Quays Waterside Project, will involve the construction of new flood walls and the raising of existing river walls. This is to be funded using West of England Local Enterprise investment.
118. A new pedestrian and cyclist bridge is being commissioned that promises to be a beautiful addition to Bath's cityscape. It is to be located and orientated to optimise pedestrian and cyclist movement between this and adjacent regeneration opportunities, neighbouring communities and the city centre. It will serve to better connect, physically and psychologically, the development site in to an expanded city centre. This significant regeneration investment is also being funded using West of England Local Enterprise Funding.

Vision

119. The area's variety of architecturally bold and robust buildings is unusual in Bath and should inform the architectural response to new buildings on the site. Imaginative, contemporary architecture should contrast with the sensitive conservation of historic buildings and the public realm, as well as responding appropriately with the wider context of the World Heritage Site. Development should create new buildings and remodelled historic buildings in an even mix of commercial and residential uses that might reflect the spirit of innovation that the site is historically associated with.
120. These sites provide the opportunity to create a variety of new routes through the area, as highlighted in the concept diagram. These are expected to:
- Improve pedestrian and cyclist connections from the residential neighbourhoods to the city centre via a beautiful new pedestrian and cycling bridge;
 - provide a number of public accesses from Lower Bristol Road to the riverside, and deliver a pedestrian route close to the river edge;
 - deliver a new route through the middle of the Riverside Court site to connect and allow access to the South Quays site. This route will eventually continue through to Midland Bridge Road when other sites come forward for development. This new east-west route will help to unlock to regeneration of these riverside sites. See concept diagram *[to be inserted]*.

Policy SB5: Development Requirements and Design Principles

Development proposals will be subject to the following design and development principles:

Bath Quays South & Riverside Court

The Bath Quays South area should deliver approximately 9,500 of B1 office space, to include a significant proportion of creative workspace within the former Stothert and Pitt buildings. Around 70 dwellings should be delivered, as well as supporting A3 uses that will help to animate this key riverside location, and important new route into the city centre.

The redevelopment of Riverside Court should retain as a minimum the existing levels of employment floorspace and be complemented by residential development that contributes towards the city's housing requirements.

Routes

- 1. Separate delivery of development of Bath Quays South and Riverside Court is acceptable on the basis that emerging development proposals for both sites deliver the key east west route as indicated on the concept diagram. This route will eventually provide a pedestrian and cycling connection from the new pedestrian and cycling footbridge to Midland Bridge Road.**
- 2. There should be other publicly accessible pedestrian and cycling routes through the sites, connecting the bridge to the other development sites and to the residential communities in the south. Additional pedestrian, cycling and vehicular access points onto the Lower Bristol Road should be provided. There should be public access to the riverside, and alongside the river's edge.**

Built Form

- 3. In response to the context of the site, it is important that new and refurbished buildings and associated landscape treatment create a strong visual and cultural identity to ensure the commercial success of the development. The overall built form should be varied to reinforce the existing built context, and it should enhance the wider cityscape and views along the river. The group value of the buildings on the South Quays site (particularly the Grade II listed Newark Works, curtilage listed buildings such as the Foundry, and the associated public realm) is important as a legacy of the city's less well known industrial heritage. Any proposals for the site will need to be supported by an appropriate assessment of the historic, cultural and architectural value of the heritage assets. Proposals will need to demonstrate that the significance of heritage assets and their setting are preserved or enhanced or, in the case of demolition, that the harm arising is outweighed by public benefits arising from the proposals.**
- 4. The riverside building at the eastern end of the South Quays site (whether new or whether the Foundry building is reused) should present a bold frontage to the river.**
- 5. Development proposals on the western portion of the South Quays site and at Riverside Court must be set back from the river's edge to protect, reinforce and provide space for a tree planting close to the river edge. This will enhance the biodiversity value of the river edge and reinforce its important contribution to wider cityscape views.**

Views, Character, Building Heights

- 6. Development should not detract from important views over the site e.g. from Wells Road towards the Royal Crescent, and looking south, towards the backdrop of Beechen Cliff, and development should respond appropriately to the general characteristics of buildings heights within the city. An analysis is required to enable an appropriate response, and to influence the height, massing and design of new buildings. The Bath Building Heights Strategy should be used as part of the evidence base and starting point for this analysis. This identifies this site as being within zone 3 – the Valley Floor, and recommends that for new development 'building shoulder height should be 4 storeys. One additional setback storey within the roofscape is likely to be acceptable'. Note that this is a recommendation for the general height only and is subject to modifiers.**
- 7. The design of the development, in particular its roofscape must be sensitive and responsive to its prominence when seen from Beechen Cliff and from other surrounding hillsides, including during hours of darkness. There are opportunities for roofs to be used for rainwater storage and capture, for solar cooling, power and for edible gardening,**

and this mix of functions can help to reduce a monolithic appearance.

Response to Flooding

- 8. The finished floor levels of development will need to be raised to above safe flooding levels. This will require careful design solutions to maintain appropriate relationships between buildings, the adjacent public realm and the riverside environment.**
- 9. The flood mitigation measures to be undertaken in this area as part of the Bath Quays Waterside Project will involve the construction of new flood walls and the raising of existing river walls. The construction of these will affect the relationship of the development site to the river. The design treatment of the public realm will need to take this into account, ensuring a positive relationship between the public realm and the river is achieved, and that the objectives of maintaining the quayside character and achieving new tree planting are delivered.**
- 10. Additional on or off-site flood mitigation and/or conveyancing measures (over and above those provided by the Bath Quays Waterside Project) that optimise the opportunities to improve the city's flood conditions, are also required to be put in place.**
- 11. A sufficient margin along the river edge should be provided to enable access for the Environment Agency. The required specification will be arrived at through early engagement with the EA.**

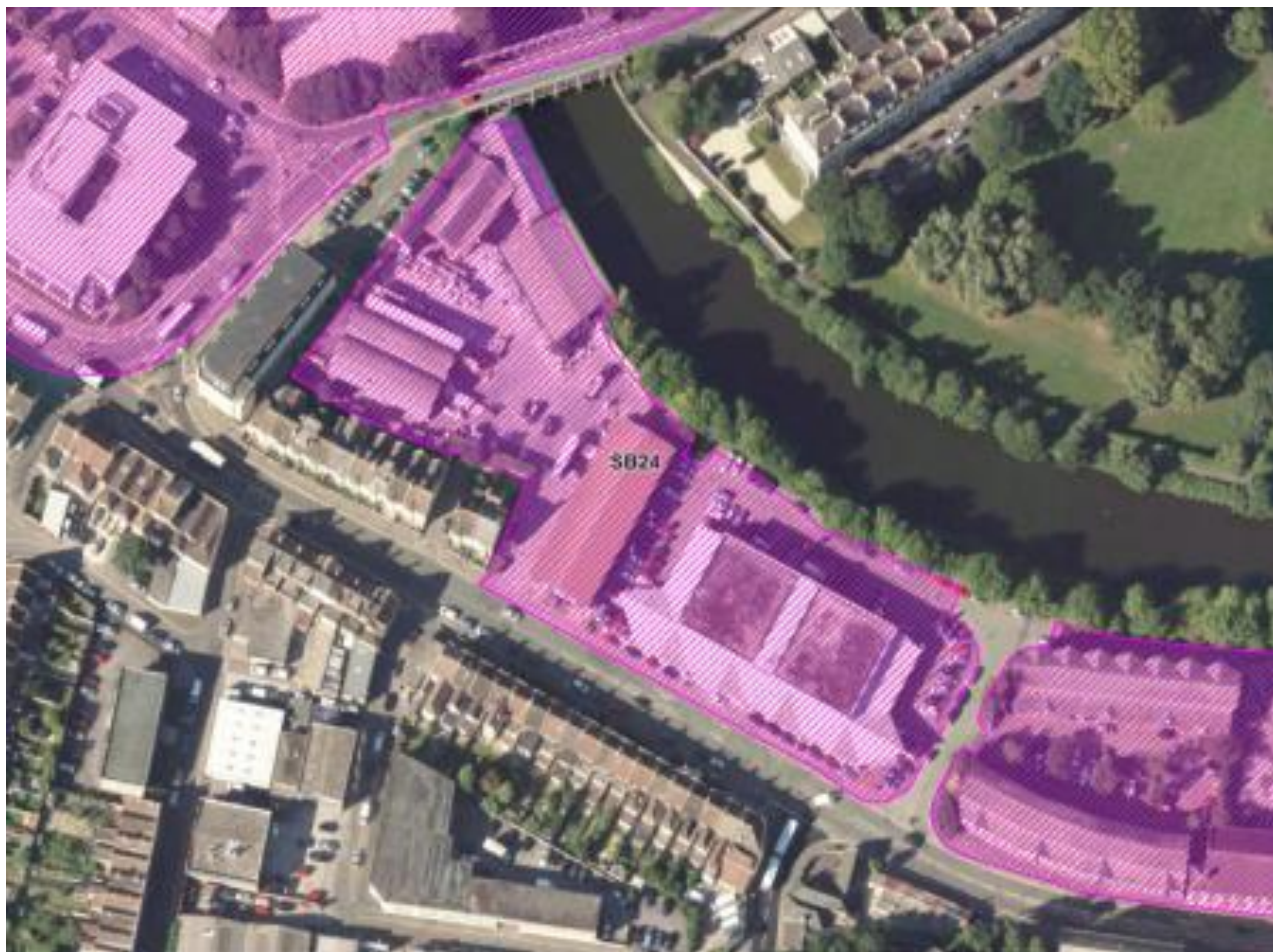
Public Realm

- 12. In relation to the South Quays site, materials, design and specification of the public realm must respond to its historic assets, character and context,. It is envisaged that the public realm will predominantly be hard surfaced, utilising sustainable urban drainage, and maintaining its historic quayside character, whilst also integrating tree planting that reinforces the important green edge to the riverside. Valued street furniture and artefacts such as rail tracks and setts should be retained.**
- 13. Measures should be introduced that enhance Green Infrastructure, taking into account the potential of extending green infrastructure networks, including measures such as wall/edge planters, trailing planters and vegetation rafts to restore and enhance biodiversity value of the river and the river edge, including the retention of a dark corridor for bats. It is a requirement for a biodiversity study to be commissioned to inform the development of the site. This should include an assessment of the impact of lighting.**

Cycle and Car Parking

- 14. Development is required to provide well designed, secure, convenient and easy to access cycle parking and storage for the use of occupants**
- 15. Car parking on the sites is to be in accordance with the Council's parking standards**

South Bank



Car Dealerships and Travis Perkins sites

Context

121. Situated to the south of Green Park between the Lower Bristol Road and Midland Bridge Road, the area is immediately to the west of the South Quays site and to the east of Sydenham Park. It is under two principal and separate land ownerships, and currently comprises car showrooms and the Travis Perkins Builders Yard. These uses are important functions within the city, however other uses such as offices and residential that optimise the riverside location, the close proximity to the city centre and the high levels of public transport accessibility, may well come forward within the plan period.
122. This site is primarily FZ3a. The Bath Quays Waterside project is undertaking flood mitigation measures in the area, with the construction of new flood walls and the raising of existing river walls. It is to be funded using West of England Local Enterprise investment. This will affect the relationship of the development site to the river, and the design treatment of the public realm will need to take this into account.
123. A new pedestrian and cyclist bridge is being commissioned that promises to be a beautiful addition to Bath's cityscape. It is to be located and orientated to optimise pedestrian and cyclist movement between this and adjacent regeneration opportunities, neighbouring communities and the city centre. It will serve to better connect, physically and psychologically, the development site in to an expanded city centre. This significant

regeneration investment is also being funded using West of England Local Enterprise Funding.

Vision

124. The delivery of the new pedestrian and cyclist bridge over the river will significantly improve the accessibility and commercial attractiveness of this area, and assist in its regeneration. There are significant opportunities within the wider area for incremental development to provide a series of mixed use buildings that deliver employment floorspace and new homes
125. The river and the riverside environment will be enhanced as a key landscape and biodiversity asset to the city and as a positive setting for proposed development.

Policy SB6: Development Requirements and Design Principles

- 1. Subject to the appropriate response to the context of the site, the total development in this area should deliver a minimum of 5,000 sq.m. of office floorspace, and a minimum of 100 dwellings. If the two parts of the site are to be delivered at separate times, then each part is expected to deliver an approximately even mix of uses.***
- 2. Prior to any redevelopment of the site, the relocation of the existing uses to appropriate alternative locations elsewhere in the city is required, unless it can be demonstrated that there is no longer a need for these uses within the city. It is recognised that it is not obvious which sites may be available and suitable for this relocation, and therefore this site may not come forward for redevelopment within the plan period or comprehensively.***
- 3. As a result of its mixed ownership, it is likely that development will be delivered separately. This is accepted on the basis that each part of the site delivers a mixed uses scheme (or that the land owners work together to deliver a joint scheme) and that an east west pedestrian and cycling route is delivered. This route will connect with the route provided at Riverside Court, providing an attractive connection from the new pedestrian and cycling footbridge at Bath Quays South, through to Midland Bridge Road.***
- 4. Additional pedestrian, cycling and vehicular access points onto the Lower Bristol Road should be provided, including public access to the riverside, and alongside the river's edge.***
- 5. Development should not detract from important views over the site and should respond appropriately to the general characteristics of buildings heights within the city. An analysis is required to enable an appropriate response, and to influence the height, massing and design of buildings. The Bath Building Heights Strategy should be used as part of the evidence base and starting point for this analysis. This identifies this site as being within zone 3 – the Valley Floor, and recommends that for new development 'building shoulder height should be 4 storeys. One additional setback storey within the roofscape is likely to be acceptable'. This is a recommendation for the general height only and is subject to modifiers. It could be, following analysis of the context of the area, that a lower height building is considered more appropriate.***

- 6. The design of the development, in particular its roofscape must be sensitive and responsive to its prominence when seen from Beechen Cliff and from other surrounding hillsides, including during hours of darkness. There are opportunities for roofs to be used for rainwater storage and capture, for solar cooling, power and for edible gardening, and this mix of functions can help to reduce a monolithic appearance.**
- 7. Development proposals must be set back from the river's edge to protect, reinforce and provide space for a tree planting close to the river edge. This will enhance the biodiversity value of the river edge and reinforce its important contribution to wider cityscape views.**
- 8. Measures should be introduced that enhance Green Infrastructure, taking into account the potential of extending green infrastructure networks, including measures such as wall/edge planter, trailing planters and vegetation rafts to restore and enhance biodiversity value of the river and the river edge, including the retention of a dark corridor for bats. It is requirement for a biodiversity study to be commissioned to inform the development of the site. This should include an assessment of the impact of lighting.**
- 9. The finished floor levels of development will need to be raised to above safe flooding levels. This will require careful design solutions to maintain appropriate relationships between buildings, the adjacent public realm and the riverside environment.**
- 10. The flood mitigation measures to be undertaken in this area as part of the Bath Quays Waterside Project will involve the construction of new flood walls and the raising of existing river walls. The construction of these will affect the relationship of the development site to the river. The design treatment of the public realm will need to take this into account, ensuring a positive relationship between the public realm and the river is achieved, and that the objectives of maintaining the quayside character and achieving new tree planting are delivered.**
- 11. Additional flood mitigation and/or conveyancing measures (over and above those provided by the Bath Quays Waterside Project) that optimise the opportunities to improve the city's flood conditions, are also required to be put in place. These can either be on or off site.**
- 12. A sufficient margin along the river edge should be provided to enable access for the Environment Agency. The required specification will be arrived at through early engagement with the EA.**

Cycle and Car Parking

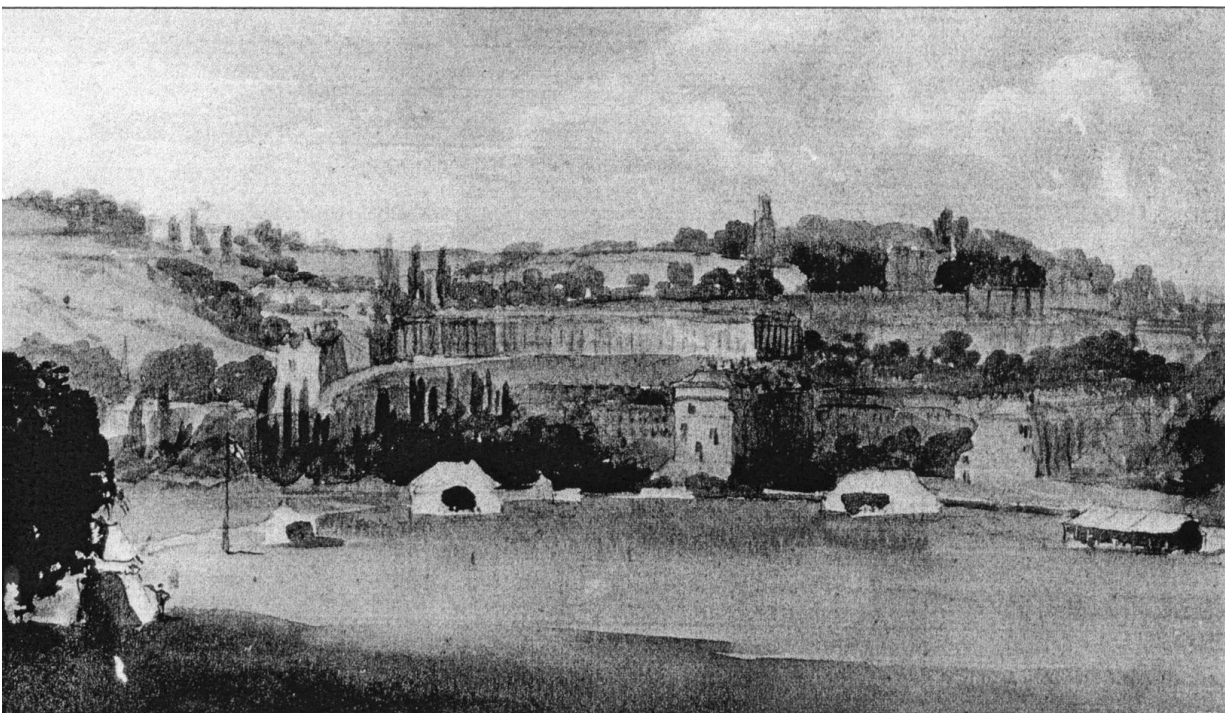
- 13. Development is required to provide well designed, secure, convenient and easy to access cycle parking and storage for the use of occupants**

Green Park Station West &

Sydenham Park

(incorporating: Bath Riverside East: Homebase, and associated car park;

Pinesway: Pinesgate offices and the associated road gyratory; Pinesway Industrial Estate.



Above: The Sydenham Cricket Ground looking north, from a water-colour by Nicholas 'Felix' Wanostrocht, a noted member of the All-England team who played here in the mid-19th century.

Context

This area comprises

Text shaded grey is from the adopted Core Strategy not part of the consultation.

- **Green Park Station West:**
 - Green Park Station, the units facing James Street West, Sainsbury's
 - **Sydenham Park*:**
 - Bath Riverside East: Homebase, its car park and overflow Sainsbury car park
 - Pinesway: Pinesgate offices and the associated road gyratory
 - Pinesway Industrial Estate
 - *A note on the name: An historical study was commissioned into this area which identified that it was previously called Sydenham Meadow. It was where the 'Sydenham Cricket Ground' was located and on which one of the world's most famous cricketers, W.G. Grace, played several times. The name 'Sydenham Park' is proposed to capture that area currently occupied by a variety of uses and buildings, and which currently lacks a clear identity as a place. The 'Park' is a reference to the neighbouring 'Green Park' and 'Oldfield Park', whilst creating a strong green identity for the area, emphasising the importance of enhancing the green infrastructure throughout.*
126. This is a complex area, with a variety of site ownerships and a diversity of uses. Some of the uses are on leases that are due to expire before the end of the plan period. There is a great degree of uncertainty over whether leases will be renewed, or whether certain businesses such as Sainsbury's will remain in their current location or seek to relocate as suggested by their planning application in 2011, which was subsequently withdrawn. What is clear is that the Bath Riverside development has raised the prospect of more development within this area during the plan period.
127. Due to this complexity and uncertainty, it is anticipated that delivery will be undertaken in a phased or piecemeal manner, with different landowners bringing forward development at different times, as and when their sites become available. However, to avoid the delivery of sub-optimal outcomes that do not deliver the wider opportunities in the area, it is crucial for the Placemaking Plan to provide the urban design framework within which these individual developments can be delivered. This framework is acknowledged as needing to be flexible enough to respond to changing circumstances, yet it also needs to be robust enough to ensure that it can be delivered.
128. Developers and landowners are required to ensure that their individual development phases contribute positively to the delivery of this urban design framework and enable the vision for the wider area to be achieved. The affected landowners will need to work jointly to enable delivery, and to undertake a masterplan as appropriate. This should respond to the requirements set out here, and to the Bath Western Riverside SPD (2008).
129. This area falls partly within FZ2 and 3a. The sequential approach to site layout is required to be informed by a site specific FRA. Black & Veatch Bath Flood Risk Management Project Technical Note Addendum has considered the impact on peak water levels and flood risk of the ground raising within this site and concluded that the impact of site raising on flood levels is negligible. However it identified that there is a potential to reduce peak water levels benefitting a wider area in undertaking channel profiling work at this site.

Vision

130. The wider area represents an exciting opportunity to create a new city destination, with a mix of uses and events that responds to the bold architectural presence of Green Park Station; a new city quarter that complements the new residential development of Bath Western Riverside and represents a confident new stage in the evolution of the city. A place that delivers zero carbon development, with integrated green infrastructure, a vibrant community of varied businesses, and an extension of a riverside residential environment. It is a location that would benefit from a clear identity and point of differentiation, one with a strongly defined built environment that responds creatively yet sensitively to the broader context of the World Heritage Site.
131. The architectural form and alignment of Green Park Station provides the inspiration for the provision of a vibrant and significant linear public space – Sydenham Park Street – that provides a focus for development in the area, and provides an enticing tree-lined route that connects the adjoining residential communities to the city centre.
132. The riverside environment will be enhanced as a key landscape and biodiversity asset.

Policy SB7: Development Requirement and Design Principles that apply to wider the Green Park Station and Sydenham Park sites

- 1. Responding to strategic viewpoints into and across the sites and to the character and sensitivity of valued assets within the World Heritage Site, this area has a significant opportunity to provide a distinct and contrasting built character to the city centre. This includes the potential of introducing different building forms or typologies, and different building materials that can [respect / complement / respond to] the visual homogeneity of the city.***
- 2. Sydenham Park Street will be the central public realm feature of the new development, as highlighted on the concept diagram. It is required to perform a number of functions that with careful and clever design can co-exist:***
 - a. It will be a key green infrastructure corridor within the area, connecting directly through from Green Park Station through the existing avenue of trees at its western end, to connect with the junction at or related to Brougham Hayes. to***
 - b. It will serve as a safe and high quality pedestrian and cycle route, to include an improved and safer junction with Brougham Hayes.***
 - c. It will also be designed to act as a potential public transport corridor, providing a direct and preferential public transport route through the site to Green Park Road.***
 - d. It will be required to maintain vehicular access to Sainsbury's (assuming it stays in its current location).***
 - e. Development will need to present an active frontage at ground floor level to create an attractive, interesting and safer environment. Development should respect and be subservient to the architectural presence of Green Park Station.***
- 3. To facilitate pedestrian and cyclist movement, streets and spaces must be designed and orientated to provide safe and direct links through the site, as indicated on the concept diagram.***

- 4. The design of the public realm within this area should be informed by the Bath Pattern Book and by the agreed public realm typologies implemented at Bath Western Riverside. Improvements to the public realm are to be undertaken by the respective developers as an integral part of their development schemes.**
- 5. The river corridor should be treated as key component of the area, creating a destination and providing public access and activity along the riverbank and at key points along it. The trees along the riverbank should be retained and enhanced, as appropriate, to strengthen and reinforce its biodiversity and landscape value, and its role as a vital part of the city's green infrastructure, including its role as a dark corridor for bats. A biodiversity study must be commissioned to inform the development of the site, and to resolve any potential tension between the design details of public access and habitats for bats.**
- 6. The provision of a green infrastructure corridor that is aligned between Norfolk Crescent Green and the entrance to St James's Cemetery, as indicated on the concept diagram, is encouraged.**
- 7. The sequential approach to site layout is required to be informed by a site specific FRA. As minimum, the floor levels have to be raised at the appropriate level taking into account the vulnerability classification informed by the FRA.**

Green Park Station area

The Council would in principle support Sainsbury's relocate to the Sydenham Park area if it is feasible. Such a move would act as a catalyst for the remodelling of the Green Park Station area, providing an opportunity to remove the surface level car parking that serves as the setting to the listed Green Park Station. This site has the potential to deliver a regeneration solution that can enhance the wider offer of the city centre to include additional and speciality comparison retail floorspace that can complement the city centre.

The Green Park Station West element of the wider regeneration area is dependent on the aspirations of Sainsbury's and their ability to ensure delivery. Should they remain in their current location with associated surface level car parking, then there is considered to be little scope for much physical change over the majority of this area.

Subject to reviewing the management of Sainsbury's car parking area, particularly in the immediate vicinity of Green Park Station, introduce an expanded programme of temporary events and activities, or the construction of temporary pods, , that could house specialist and small scale employment, retail or market activities. A more engaging use of the area underneath the canopy of Green Park Station itself would in principle be strongly supported by the Council.

If Sainsbury's relocate to Sydenham Park (or indeed elsewhere), then this area has potential to be designed as a mixed use environment, providing for smaller scale uses that complement the city centre environment and help to serve the needs of the new residential community at Bath Riverside.

Development Requirement and Design Principles that apply to Green Park Station West

- 1. There are potential opportunities for development at the periphery of the site, and**

development, including building height, materials and development form will need to respond appropriately to this part of the conservation area, to neighbouring buildings and to the relationship with established planting.

- 2. The height and position of new buildings must preserve the view corridor to Green Park Station, and development should respect and be subservient to the architectural presence of Green Park Station.*

Development should not detract from important views over the site and should respond appropriately to the general characteristics of buildings heights within the city. An analysis is required to enable an appropriate response, and to influence the height, massing and design of buildings. The Bath Building Heights Strategy should be used as part of the evidence base and the starting point for this analysis. This identifies this site as being within zone 1 – the Georgian City, and recommends that for new development ‘the overall height should not be less than or exceed the overall prevailing height of nearby Georgian buildings.’ Note that this is a recommendation for the general height only and is subject to modifiers.

Sydenham Park

The Sydenham Park area has been divided into a number of different sites reflecting the principal site ownerships and in anticipation of development being delivered in phases – see land ownership diagram. In order to ensure that the broader benefits are achieved, each site will be expected to contribute to, help deliver and respond to the urban design framework as illustrated in the concept diagram. The affected landowners will need work jointly to enable delivery, and to undertake a masterplan as appropriate.

Delivery of a mix of land uses within the broader Sydenham Park area which reflects its location between a large residential population and the city centre. Residential development is expected to make up a significant proportion of floorspace (over 500 units), which will be complemented with employment floorspace (around 14,000sqm), retailing (of around 7,000sqm, subject to it not competing with the retail offer of other centres as defined in CP12), a hotel (of around 150 beds) and complementary food and drink establishments. Purpose built student accommodation in this area is not acceptable as this would impede the delivery other Council objectives.

Homebase

The existing store plays an important role in the city, providing a large scale DIY, home and garden offer. Retention of this type of retailing within the wider Sydenham Park area is supported, although it is acknowledged that its current format (a large retail shed with surface level car parking) does not sit comfortably with the vision for Sydenham Park.

The Placemaking Plan is seeking the delivery of mixed use development within the wider Sydenham Park area. This includes an expectation, subject to it not competing with the retail offer of other centres as defined in CP12, that around 7,000sqm of retailing floorspace is achieved. With creative design, this could have the potential to include units that may be suitable for a smaller scale DIY offer.

The retention of a DIY store on this site is covered under Policy B2 4(h) in the Core Strategy. This relates to the reincorporation of existing uses as part of redevelopment proposals. In specific circumstances it also requires that ‘reasonable efforts are made to ensure that such uses are relocated elsewhere’.

It is anticipated that the different landowners will need work jointly to enable delivery of an appropriate retail element.

Pinesgate

The Council is seeking to ensure the delivery of a mixed use scheme that includes a minimum of 10,000 sq.m. of new office floorspace. Other uses would be appropriate that contribute to the vitality of the area.

Development Requirement and Design Principles that apply to Sydenham Park area

- 1. Focused on Sydenham Park Street, this area will be designed as a pedestrian and cyclist friendly environment, facilitating easy, safe and comfortable movement through the area. This is not to preclude vehicular access to serve the existing or relocated supermarket, other development blocks, or the potential provision of public transport.***
- 2. Active uses are expected adjacent to Sydenham Park Street.***
- 3. The height and position of new buildings must preserve the view corridor to Green Park Station, which should remain dominant in views and height to new development.***
- 4. Development should not detract from important views over the site and should respond appropriately to the general characteristics of buildings heights within the city. An analysis is required to enable an appropriate response, and to influence the height, massing and design of buildings. The Bath Building Heights Strategy should be used as part of the evidence base and the starting point for this analysis. This identifies this site as being within zone 3 – the Valley Floor, and recommends that for new development ‘building shoulder height should be 4 storeys. One additional setback storey within the roofscape is likely to be acceptable’. Note that this is a recommendation for the general height only and is subject to modifiers.***
- 5. There should be a clearly defined frontage to the Lower Bristol Road.***
- 6. Development proposals are required to provide a positive frontage to the Pinesway gyratory and implement improvements to the public realm to deliver a more pedestrian and cycle friendly environment. The gyratory is an important part of the highway network, and its existing vehicular capacity is likely to need to be maintained.***
- 7. The sequential approach to site layout is required informed by a site specific FRA. As minimum, the floor levels have to be raised at the appropriate level taking into account the vulnerability classification informed by the FRA. Provide conveyancing provision to mitigate impact either on site or through other appropriate improvements such as to Twerton Gate.***

Western Riverside

Role in the Spatial Strategy for Bath



Core Strategy Diagram 8A: Western Riverside

Western Riverside

133. The area formerly occupied by the Stothert and Pitt engineering company and adjoining land has been earmarked for a major programme of residential-led regeneration for a number of years. Western Riverside ~~is~~ was first allocated for residential led development in Policy GDS.1/B1 of the Bath and North East Somerset Local Plan (October 2007). This policy ~~is~~ was supported by a Master Plan Supplementary Document (March, 2008). This is a complex site that has, inter alia, required flood mitigation and remediation works to decommission and remove the Windsor Gas Holder Station. However, but significant planning development management and implementation progress has been made with the delivery of phase I commencing in December 2010. Much of the land is derelict or vacant but other parts are occupied. Not all areas within the Western Riverside zone may be regenerated during the Pan period e.g. part of the Lower Bristol Road frontage where there are car showrooms that are successfully trading and investing in their estate. However, should such land become available the strategy is to enable residential-led redevelopment. The estimated housing potential of this area for the plan period is around 2,200.

134. ~~In order to fully deliver Bath Western Riverside, land remediation work to decommission and remove the Windsor Gas Holder Station will be needed.~~

Extent of Western Riverside

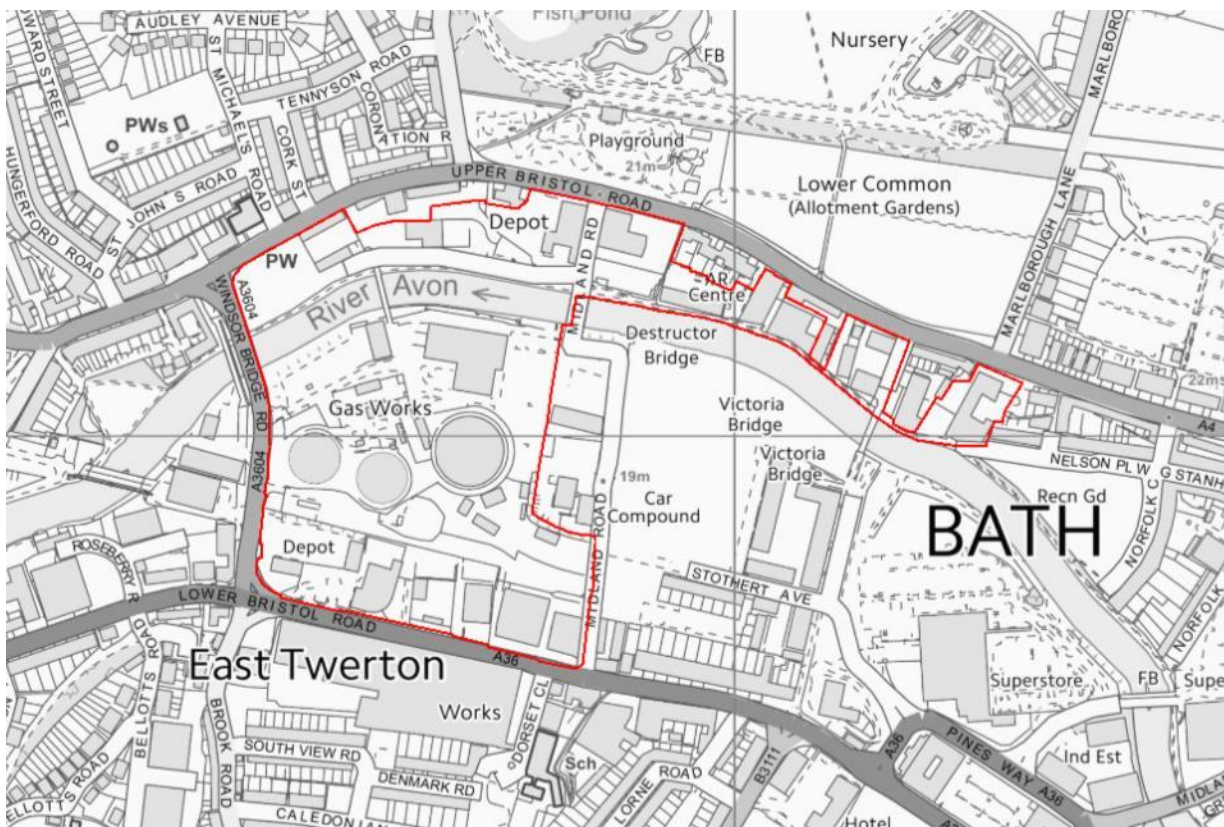
135. The Core Strategy Western Riverside policy area is a smaller area than that to which the 2007 Local Plan Policy (GDS.1/B1) and its accompanying SPD applies. It does not include

the majority of the area referred to as Western Riverside East aside from the area covered by the approved outline planning permission to the north of the Homebase car park. Western Riverside East is now conceptualised as forming part of the Central Area because of the commercially led mixed use emphasis being sought for this area.

Western Riverside Policy Approach

136. The spatial strategy retains the planning principles that have been established for this area within Local Plan Policy GDS.1/B1 for Western Riverside continues to apply to the area shown in Diagram 8 and is saved as part of the Development Plan. For Riverside East, Policy GDS.1/B1 and the BWR SPD will apply alongside Policy B2 until CIL is adopted to supersede extant planning obligations guidance and the Placemaking Plan is adopted to supersede extant other guidance in the BWR SPD. Policy GDS.1/B1 of the Bath and North East Somerset Local Plan (October 2007) and the 2008 Masterplan SPD. The principles of GDS.1/B1 are rolled forward into Placemaking Policy SB.XX. The 2008 Masterplan SPD will continue to give further guidance in respect of the implementation of this policy.

Placemaking Plan Site Allocation



Context

137. That part of the strategic policy area that has yet to be redeveloped is allocated for residential redevelopment and associated social infrastructure. Whilst much of the area benefits from outline or full planning permission (notably for majority of the land to the south of the river and the civic amenity site/ waster transfer station), the retention of a policy allocation will secure the strategy for this area. The extent of this area may change during the examination phase on Draft Plan and therefore need to evolve (contract) to reflect change on the ground. The estimated housing potential of the allocated area during

the plan period is around 1,500 (after taking into account what has been or is substantially under construction)

Vision

As set out in the Core Strategy and Bath Western Riverside SPD

Development Requirements and Design Principles

As set out in Policy XX and the Bath Western Riverside SPD

Policy SB8: Western Riverside

Development requirements for the whole site

- 1. Residential redevelopment including around 1,500 dwellings, not including student accommodation.***
- 2. High density urban form***
- 3. A primary school***
- 4. On and off site transport infrastructure including an integrated transport system***
- 5. Public access to and along the riverside***
- 6. Any planning application will need to demonstrate that it is consistent with and contributes to the delivery of the comprehensive development of the whole site by reference to Bath Western Riverside SPD.***
- 7. Existing businesses within the site will be permitted to continue to invest in their estates for business purposes insofar as this does not prevent necessary vehicular access to the core of the site. Any associated non-business related development as part of the reorganisation of an estate, including building above the primary business shall be for residential use.***

Additional Requirements for land within the North Bank

- 1. Provide an active building frontage with building entrances onto Upper Bristol Road, Windsor Bridge Road, and the riverside***
- 2. Create an appropriate townscape that relates to the scale of the Upper Bristol Road /this key route into the city, rather than seeking to create a 'gateway' or landmark buildings.***
- 3. Ensure that development does not detract from important views over the site. An analysis of viewpoints is required to enable an appropriate response, and to influence the height, massing and orientation of buildings.***
- 4. The siting of development should optimise vehicular access to neighbouring sites.***
- 5. Enhance the GI network for people and wildlife, including where practicable measures to restore and enhance biodiversity value of the river and the river edge, including the retention of a dark corridor for bats, and improve access to the river for maintenance purposes.***
- 6. The sequential approach to site layout is required informed by a site specific FRA. As minimum, the floor levels have to be raised at the appropriate level taking into account the vulnerability classification informed by the FRA***

Twerton and Newbridge Riversides

These areas are characterised by their contribution to Bath's industrial history and present day employment structure. The Core Strategy presents a policy framework to shape change in these areas so that they can continue to contribute to the economic vision for the city. The area is well placed to enable sustained transport choices to be made and planning policy seeks to further enhance those assets.

POLICY B3: Strategic Policy for Twerton and Newbridge Riversides

1. Role of Newbridge and Twerton Riversides (including the Bath Press)

These locations form the western extent of the City of Ideas Enterprise Area

- Newbridge Riverside will function as Bath's primary location for industrial enterprise, providing about 12 ha of land at Locksbrook Road, Brassmill Lane and the Maltings for a range of activities including advanced manufacturing. There is therefore a presumption in favour of retaining land and premises in the B1, B2 and B8 use class where identified on the policies map as being within a Strategic Industrial Estate under policy ED.2A ~~where this remains a viable use of land and is supported by market signals that there is demand for continued occupation that cannot reasonably be accommodated elsewhere.~~ Proposals for other uses will be subject to the application Policy ED.2B,*
- Twerton Riverside has contracted as an industrial location in recent decades. This area is suitable for a broader range of uses and there is scope to redevelop the area to provide new business (B1a, b and c) premises and housing. The area presents an opportunity to host business that is displaced as a consequence of the residential led development of Western Riverside and the growth of the intensification of the Central Area into BWR East. Whilst Newbridge Riverside will remain the core industrial location, Twerton Riverside can provide additional flexibility. It will therefore be necessary to maintain an appropriate level of land in this area for B1c uses alongside office uses and housing.*

2. Placemaking Principles

Assets of Newbridge and Twerton Riverside

Development proposals must be informed and shaped by the following characteristics

- a. The eastern part of Twerton Riverside lies close to Western Riverside which will experience a significant uplift in its environmental quality and will act as a catalyst for investment in the wider area.*
- b. There are a number of heritage listed and non-designated heritage assets in the area pertaining to its industrial past, including Brunel's Great Western Railway, the façade of the Bath Press and two 1960/70s industrial buildings of innovative construction and offering adaptable accommodation for a range of industrial users*
- ~~c. Views in and out of the area e.g. from higher ground at Newbridge Hill and Bath City Farm~~*
- d. The river including its banks and open land at the western section of the area are an important wildlife resource. Measures should be incorporated to restore and enhance the biodiversity value of the river and the river edge, including the retention of a dark corridor for bats.*
- e. There is good, yet not fully realised connectivity with the city centre and the Two Tunnels*

Greenway via the shared riverside walking and cycling route, which is narrow in places.

f. The ~~intensification~~ of Twerton Riverside ~~as area~~ is an accessible location due to its the proximity to ~~of~~ Oldfield Park station

Risks to Newbridge and Twerton Riverside

The following issues are identified as key risks to the success of these areas that should be addressed in development proposals:

a. An excessive loss of industrial space would harm Bath's mixed economic profile.

b. There are areas of conflict between industrial activity and residential areas - particularly with regard to the movement of heavy goods vehicles in the Newbridge Riverside area.

c. Much existing development has a poor relationship with the riverside. Pedestrian access is poor, crossing points are limited and open space is fragmented.

d. There is a danger that ~~redevelopment~~ will fail to connect to the riverside path or, the Two Tunnels Greenway and the sustainable route that follows the alignment of the former Midland Railway and miss the opportunity to enhance walking and cycling routes,

e. There is risk that development will detract from important views over the site and consequently affect the significance of the Bath WHS or the Bath Conservation or its setting. A landscape and visual impact assessment is required to enable an appropriate design response to this issue. The World Heritage Site Setting SPD and Bath Building Heights Strategy should be used as part of the evidence base for this analysis.

e. In places Twerton Riverside presents a poor frontage to the Lower Bristol Road, which is a key approach to the city centre.

f. The Upper Bristol Road (A4) and Lower Bristol Road (A36), including the Windsor Bridge Road junctions become congested at peak times.

g. Parts of this area are at risk from flooding.

3 Key Development Opportunities

Development proposals in this area that accord with the provisions of this and other relevant policies ~~policy~~ will be welcomed.

Key regeneration opportunities in the area include:

- **The Bath Press**
- **Roseberry Place**

138. Weston Island is not included in this policy area but development (subject to the obvious relevance of planning policy of flood risk) could provide a very special opportunity to improve the image and identity for this part of the city; enhancing the ecological role of the island, improving pedestrian connections between north and south. However, given that an alternative site would need to be identified for a bus depot (notwithstanding any lease arrangements currently in operation), it is not likely that this site will come forward for development during the plan period.

The Bath Press



Context

139. The former Bath Press site presents a dominant and landmark frontage to the Lower Bristol Road. It is in very close proximity to the residential community of Oldfield Park, the emerging community at Bath Riverside and is located just to the north of Oldfield Park train station.
140. The site is predominantly within Flood Zone 1. But the Lower Bristol Road is within Flood Zone 2. The sequential approach should be taken within the site and avoid locating more vulnerable uses on the area affected by flood risk.

Vision

141. The site will deliver a mixed use development that creates a positive identity for this area, and optimises its close proximity to Oldfield Park Train Station, and to nearby pedestrian and cycle routes.
142. The building's historic significance will be retained in any redevelopment proposals, and will be imaginatively integrated with contemporary, zero carbon development that integrates and connects to existing and new green infrastructure.

Policy SB9: Development Requirements and Design Principles

- 1. Mixed use redevelopment comprised of employment (minimum of 1,500 sq metres of office floorspace) and residential development (at least 200 flats), potentially complemented by opportunities within the leisure sectors.**
- 2. Retention of the 1920s factory façade and the historically important elements of the building in recognition of their value as a local asset. They should be considered as an integral part of an urban design response which will enhance the Lower Bristol Road, the surrounding area and the development itself.**
- 3. Protect northerly views across the site through the identification and retention of key view corridors.**
- 4. Development should not detract from important views over the site and should respond appropriately to the general characteristics of buildings heights within the city. An analysis is required to enable an appropriate response, and to influence the height, massing and design of buildings. The Bath Building Heights Strategy should be used as part of the evidence base and the starting point for this analysis. This identifies this site as being within zone 3 – the Valley Floor, and recommends that for new development ‘building shoulder height should be 4 storeys. One additional setback storey within the roofscape is likely to be acceptable’. Note that this is a recommendation for the general height only and is subject to modifiers.**
- 5. Consider the provision of larger scale building typologies that can offer a different format of business space compared with the more centrally located sites. The intention is for the city to offer a broad range of employment spaces throughout the city.**
- 6. Ensure that the built form creates a more engaging and pedestrian friendly response to the key streets surrounding the site, including an active edge to Lower Bristol Road and Brook Road. The development should help to redefine the identity of the junction of Windsor Bridge Road and Lower Bristol Road.**
- 7. Provide new streets and spaces through the site that improve pedestrian and cycling connections to Oldfield Park Railway Station, Moorland Road District Centre, and Victoria Park for neighbouring residential communities.**
- 8. Implement improvements to the pedestrian and cycling experience along the Lower Bristol Road and at the junction with Windsor Bridge Road**
- 9. Provide a new green infrastructure link that connects to the green link within the approved scheme of phase two of the BWR development. This will provide a green corridor from Royal Victoria Park, the river, through Western Riverside, via the Bath Press Site and associated streets, into the Oldfield Park area. It will link strategic and existing pocket green spaces to create a green corridor for the benefit of people and wildlife. This could include the potential for green roofs on some elements of the Bath Press site.**
- 10. The development must provide cycle parking and storage that is covered, secure, convenient, easy to access and well designed.**

Roseberry Place



Context

143. Forming the corner of Lower Bristol Road and Windsor Bridge Road, and lying to the south of the River Avon, this area is in a prominent location on a key route into the city. The site is currently occupied by a range of industrial buildings, workshops.
144. Its riverside location has been identified as an 'Ecological Node' in the Natural Environment Evidence Base [link] commissioned to inform the Council's Masterplan for the Enterprise Area. An 'Ecological Node' is defined as an area 'where wildlife corridors intersect and/or there are features of particular ecological value in the river channel'.
145. This site falls mainly within Flood Zone 2, partly within Flood Zone 3 and increase flood risk with climate change. Black & Veatch [Bath Flood Risk Management Project Technical Note Addendum](#) has considered the impact on peak water levels and flood risk of the ground raising within this site and concluded that the impact of site raising on flood levels is negligible.
146. Stable Yard lies to the north of Roseberry Place. It is a trade business park, and is occupied by a variety of businesses that perform an important role in the city's economy. This site is not currently available for development.

Vision

147. There is significant scope for the remodelling of this site to provide a development that:
- Redefines the image and identity of this key site on an important entrance route into the city;
 - Reinforces its important role as 'ecological node';
 - Accommodates a diverse range of business spaces, including potentially the relocation of displaced businesses from the central area;
 - Provides homes that help to meet the city's housing needs and provide for more activity during the day and evening;
 - Enables direct connections to an extended Bristol / Bath Shared Use Path and to the Two Tunnels Cycle Route, together with new pedestrian and cyclist connections across the Lower Bristol Road and Windsor Bridge Road. There is potential for these connections to be provided as bridges over these main roads, which could also serve as a key Green Infrastructure routes.
 - An engaging and active frontage to the river, with potential for river related activities.

Policy SB10: Development Requirements and Design Principles

Development proposals will be expected to deliver:

- 1. A mix of uses which include around 200 residential units and a minimum of 6,000 sq.m. of B1 employment floorspace. Other complementary uses to enable a more diverse and engaging environment, such as small scale local needs retail will be permitted where these do not adversely impact on existing retail centres.***
- 2. A well-defined and active frontage to Lower Bristol Road and Windsor Bridge Road to enhance this key entrance into the city.***
- 3. A collection of buildings that respond positively to the important views over the site and the valued character of the area. An analysis is required to enable an appropriate response, and to influence the height, massing and design of buildings. The Bath Building Heights Strategy should be used as part of the evidence base and the starting point for this analysis. This identifies this site as being within zone 3 – the Valley Floor, and recommends that for new development 'building shoulder height should be 4 storeys. One additional setback storey within the roofscape is likely to be acceptable'. Note that this is a recommendation for the general height only and is subject to modifiers.***
- 4. Green infrastructure and a cycle link that connects Linear Way (two tunnels cycle route) to the safeguarded sustainable transport route (extension of the Bristol/Bath shared use route). This will be enabled by facilitating connections across Windsor Bridge Road and Lower Bristol Road.***
- 5. Measures that enhance green infrastructure and the 'ecological node' that this site forms part of (see Natural Environment Evidence Base [link]). Such measures should take into account the potential of extending green infrastructure networks, including measures to restore and enhance the biodiversity value of the river and the river edge, including the retention of a dark corridor for bats. It is requirement for a biodiversity study to be commissioned to inform the development of the site.***

6. ***Flexible and robust building forms that enable changes of use over time.***
7. ***An appropriate response to the character and context of the area. There is considerable scope for a wider variety of building typologies and materials to be used, responding to its mixed use character whilst respecting the homogenous character of the whole city.***
8. ***Carriageway improvements to the junction, including implementing the road widening required to improve the efficiency and safety of the highway capacity at this junction, and to facilitate pedestrian and cyclist movement.***
9. ***The development must provide cycle parking and storage that is covered, secure, convenient, easy to access and well designed.***
10. ***The sequential approach to site layout is required informed by a site specific FRA. As minimum, the floor levels have to be raised at the appropriate level taking into account the vulnerability classification informed by the FRA.***

Bath's Neighbourhoods

148. While the Central Area and Enterprise Area is the headline delivery location for Bath, it is the outer neighbourhoods that make up the majority of the physical extent of the city and where the most people live.
149. The suburban workings of the city are important to the spatial strategy. During the 30 years before the First World War, Bath suburbs expanded significantly and incorporated neighbouring rural parishes that have since been progressively infilled. Its Victorian, inter-war, post war and modern neighbourhoods host a sizable population which requires access to goods, services and facilities both locally and beyond. Attractive neighbourhoods with successful local centres, good schools, a well-managed green infrastructure network, valued heritage and sustainable transport choices are necessary for economic success, quality of life and social and cultural vitality.
150. It is beyond the scope of the Core Strategy to consider local aspects of change within outer Bath. This can be achieved through Neighbourhood Planning and by the Placemaking Plan. Core Strategy Policy in relation to a number of generic matters /topics is covered in the Core Policies section. The spatial strategy focuses on key areas or issues requiring strategic guidance. Crucially, suburban Bath is expected to yield about 2,800 new homes on large sites and will account for the majority of the 1,000 units forecast to come forward on small sites throughout the city. Outer Bath will therefore make a significant contribution to the overall target of around 7,000 new homes for the city and contains a district centre and local centres that need to be identified as part of the retail hierarchy.

Ministry of Defence Land

151. Within Bath's outer neighbourhoods the most significant opportunities for housing development within the city are the three former Ministry of Defence (MoD) sites, including former Royal High playing field land adjoining Ensleigh. The sites were sold at the start of the plan period and the MoD has mostly vacated all areas and will do so in full by

2018. Planning permission was granted for residential-led development on all three MoD sites during 2015, including new primary school at Foxhill. An outline application for the former Royal High land was submitted in August 2015 for housing and a primary school. The land in question will yield around 1,300 dwellings, two new primary schools, 750 sq.m. retail and 1,000 sq.m. office space, broken down as follows

- Foxhill – up to 700 dwellings, a new primary school, 500 sq.m. retail and 1,000 sq.m. office space permitted in outline (of which 276 dwellings in full)
- Warminster Road – 204 dwellings permitted in full
- Ensligh – 290 dwellings permitted (of which 220 in full) and 250 sq.m. of local needs retail
- Royal High Ensligh 95 dwellings and a primary school applied for in outline

152. Curo has indicated its intention to pursue regeneration of its affordable housing stock in the Foxhill area adjoining the former MoD site. As set out in the District-wide chapter the Council is generally supportive of such regeneration, where it is justified, and will seek to protect against the net loss of much needed affordable housing stock, while also allowing for enhancements to that stock (see Policy H9).

153. ~~Outside the river corridor the Ministry of Defence have sold and are in the process of vacating Foxhill (Odd Down), Ensligh (Lansdown), and Warminster Road (Bathwick). Together the sites amount to some 36ha in area. These have been purchased by housing providers and private developers. In advance of the sale of the sites the Council prepared concept statements setting out its aspirations in respect of what it expected each area to deliver. The Strategic Housing Land Availability Assessment identifies that these sites can deliver well in excess of 1,000 new homes. Drawing on this strategic assessment the Placemaking Plan and/or Development Management process will refine the optimum housing capacity of these sites and consider their overall prospects in more detail, including the scope for business space and measures to enable sustainable travel to the city centre and local centres. For the purposes of the Core Strategy it is sufficient to confirm their suitability and availability of the MoD sites for redevelopment and to observe that delivery within the plan period is an achievable prospect.~~

District and Local Centres

154. The spatial strategy seeks to secure and enhance the vital role that Moorland Road (a District centre) and a collection of local centres play as part of Bath's neighbourhoods. Moorland Road and local centres provide proximity to a range of goods and services. As well as providing for everyday shopping needs these centres contribute to economic and cultural diversity and opportunity by hosting small, local and independent shops and businesses. In most cases these can be reached within a relatively short walk or cycle. There is however, an uneven pattern of provision across the city and variety in the health and offer of local centres.

155. The most characterful of the local centres have evolved from the centres of outlying villages that became absorbed during the 20th suburban century expansion of the city (e.g. Weston, Larkhall and Twerton) or are embedded within the Georgian city (e.g. Widcombe Parade). Equally vibrant are Chelsea Road and Bear Flat situated within Victorian suburban development. Elsewhere there are more modest post-war centres and standalone units

(including supermarkets and petrol stations associated convenience retail) that contribute to the spatial coverage of local facilities.

156. Moorland Road district centre and the local centres are shown on Diagram 10 and are listed in Table 4. Policy CP12 sets out the strategic approach for managing change within and likely to affect, district and local centres. Local Plan policies protect the centres from changes of use or out of centre threats that would harm their vitality and viability. Some centres have potential for significant enhancement; others are more constrained or are already trading successfully. The Placemaking Plan will consider the extent to which local centres can further support sustainable neighbourhoods in more detail.

Royal United Hospital

157. Located in Weston the Royal United Hospital is a major sub-regional healthcare facility serving
158. 500,000 people within the District and beyond. The Trust has prepared an Estate Strategy that sets out its proposals for future investment in the site. The Strategy seeks to secure first class facilities for the delivery of healthcare at the site.
159. The Council will support investment in the development of the hospital to meet the needs of health care infrastructure. ~~The Council also observes that part of the site may become surplus to the Trust's requirements and be available for alternative uses during the Core Strategy period.~~
160. Bath City Football Club, who own Twerton Park football stadium is in the middle of a community Buyout process, the outcome of which will not be known until well into 2016. Previously it has stated that the site will be available for redevelopment during the Plan period, that it intended to leave Twerton Park and sell it or facilitate a land swap elsewhere in B&NES on which it can build a new facility. The site will may therefore be available for redevelopment as part of a residential/mixed-use scheme during the Plan period. ~~The details of any such scheme can be determined through the Placemaking Plan.~~ Any scheme should preferably benefit or at least not adversely affect the local centre at Twerton. There is considerable uncertainty and the Council does not currently 'budget' for any development occurring here is endeavouring to assist the Football Club to identify a suitable alternative location and this can be progressed in the Placemaking Plan. A site allocation is made so that there is no site specific gap should the site become available.

School places

161. Housing and population growth within and on the edge of the city will create additional demand for primary and secondary education places across the city. In some instances the impact will be particularly significant and localised, e.g. areas with a high capacity to deliver family housing.
162. The Council's education service has recently completed reviews of primary and secondary school provision within the city and this has taken account of the spatial strategy and in site allocations. The Infrastructure Delivery Programme provides more information on the relationship between housing development, population growth and school places

Insert Table 4 – District and Local Centres

A well-managed network of open spaces and green corridors

163. Green infrastructure assets and designations across Bath are shown in detail on the Policies Map and will be maintained, protected and enhanced in accordance with relevant core policies and development management policies.

Two Tunnels Route

164. The Two Tunnels walking and cycling route represents a major addition to the Green Infrastructure network and will connect the south of the city and beyond to national cycle route (NCN 24).

Nature Conservation

- 2.29 Nature Conservation designations within outer Bath are shown in detail on the Policies Map and will be maintained, protected and enhanced in accordance with relevant core policies and development management policies.

The Bath/Bradford-on-Avon Special Area of Conservation (SAC)

165. This European site is designated because of the presence of bat populations. European and UK legislation seek to protect the integrity of the site, bat roosts and foraging areas.

Sustainable Transport Choices

166. Improvements to pedestrian, cycling and public transport routes will be made to enhance links between the neighbourhoods of Bath Oldfield Park Station, the city centre and the Enterprise Area.

Insert - DIAGRAM 10 BATH'S NEIGHBOURHOODS

Former Ministry of Defence sites at Foxhill, Warminster Road and Ensleigh (including former Royal High playing field)

167. Despite the planning history pertaining to these site they are allocated in the Placemaking Plan as they have not yet been developed to any significant degree. The developers of Ensleigh (Bloor and Linden) and Foxhill (Curo) are known. However, the initial buyer of the Warminster Road site was the land developer Square Bay, and the onward purchaser on the planning permission that they have been granted has yet to be revealed. Further the applicant for the Royal High land is also a land developer and the site will be sold-on. It is deemed necessary to secure the housing and other aspirations for these sites in the Development Plan to safeguard their optimum future contribution to Bath's development requirements

Former MoD Fox Hill / Mulberry Park



Context

168. This 19ha site is located to the north of Bradford Road, east of Fox Hill and west of Priory Close. To the southeast of the site is the Backstones open space and residential properties fronting Bradford Road. To the west the site is bounded by residential properties on Fox Hill and the road itself. To the east is the Combe Down Rugby ground accessed off Bramble Way and then residential properties on Stonehouse Lane and Trinity Road. To the east the

site is bounded by Pope's Walk with residential properties on Priory Close beyond. To the north of the site there is a treed escarpment with a number of residential properties dotted along it. The site is relatively flat with a gentle slope from south to north. It is located on the plateau above the City with the land to the north of the site falling steeply down to Perrymead. The trees both on and adjoining the northern boundary of the site form part of the tree lined edge to the 'bowl' within which the City of Bath is located.

169. The site was formerly occupied by low rise MOD buildings most of single storey but some of 2 storey, large areas of surface car parking and landscaping. The trees on the site are subject to a Tree
170. Preservation Order (TPO) (Ministry Of Defence Foxhill, Combe Down, Bath No. 298) made in 2013
171. Vehicular access to the site is currently achieved from Bradford Road (former primary access to the MOD site) and Foxhill Road (former secondary access). There is no other vehicular access to the site.
172. The site lies within the City of Bath World Heritage Site (WHS), the southern part of the site also lies within the Bath Conservation Area. The north of the site lies adjacent to the Cotswolds Area of Outstanding Natural Beauty (AONB) and Green Belt, which washes over the 'Perrymead' area, extending to the north and east towards the City.
173. There are no listed buildings on the site. Greendown Terrace and a Jewish Cemetery both lie opposite the application site on the southern side of Bradford Road and are Grade II listed. A small stone bridge over Pope's Walk to the north east corner of the site is also Grade II listed. Prior Park, a Grade I Listed Building and an Historic Park and Garden is located to the east of the site, separated from the site by existing residential development on Priory Close and Ralph Allen Drive.
174. The site has outline permission for up to 700 dwellings and full permission for the first phase of 276. The purpose of the site allocation is to 'lock-in' the principles established in the outline permission within the Development Plan should circumstances in respect of delivery change.

Vision

175. In accordance with the Council's adopted Concept Statement, a major new residential neighbourhood within the Combe Down area which provides its own primary school, and local scale retail and employment space, integrates with the existing Fox Hill estates and is of skyline issues in respect of the World Heritage Site

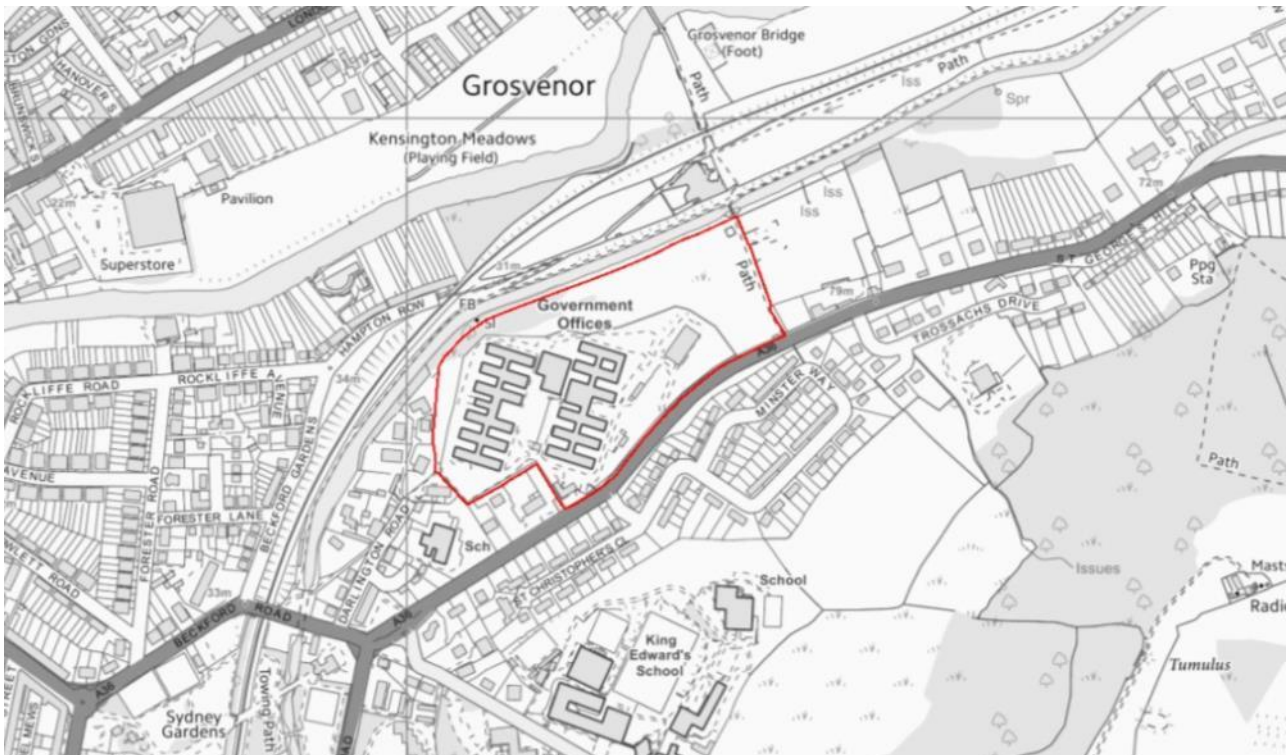
Policy SB11 Former MoD Fox Hill

Development Requirements and Design Principles

- 1) ***14.5ha developable area for around 700 residential dwellings and areas for employment, community use and retail development, 1.1ha identified for a primary school site and with the remainder of the site identified as green space (formal and natural).***
- 2) ***1000sqm of B1 space and 500 sq.m. of retailing space***

- 3) **1.5ha of natural green space and 2.1ha of formal green space to be provided within the site**
- 4) **The maximum scale of development shall be a mix of predominantly 2 and 3 storey development across the site, with some areas in the centre of the site rising to a height capable of accommodating 4 storey development. Based on AOD levels, the maximum height of development on the site will be 176m AOD.**
- 5) **An 'advance planting plan' identifying a comprehensive tree planting proposal accompanied by management proposals on the northern part of the application site.**
- 6) **Great weight will be given to maintain the significance of assets, in particular in relation to views of the site and its illumination in respect of the Bath WHS and setting of the Bath Conservation Area. The Bath WHS Setting SPD should be used to assess development effects.**

Former MoD Warminster Road



Context

176. A 7.0 ha site occupying a highly prominent location between the Warminster Road (A36) to the south and the Kennet and Avon Canal to the north. The A36 is a key approach route to the city. At present the site contains a number of single storey office blocks with associated vehicular circulation and parking contained within a security fence, plus undeveloped natural areas to the north and east. The land slopes steeply down from Warminster Road to the canal. This topography and a prominent undeveloped gap at the eastern end of the site allow commanding panoramic views across the City to Lansdown, Larkhall and Walcot on the opposite side of the valley. A Public Footpath runs steeply down the hill at this point to a pedestrian bridge across the canal at the bottom. Immediately to the east of the site is Hampton House, a Grade II Listed Building. Beyond to the east is inter-war and post-war

ribbon development along the Warminster Road. To the west of the site the road is more enclosed by mature street trees, and the buildings consist predominantly of large detached Victorian villas set in large, well vegetated plots. On the southern side of Warminster Road, the full length of the site is developed as a suburban estate of detached properties.

177. Whilst the buildings within the site are functional in character, the site is prominent in citywide views and is highly sensitive and heavily constrained in terms of planning designations. The site lies within the World Heritage Site and the Bath Conservation Area. Several buildings lying outside the site are Listed. The undeveloped land outside the security fence comprises a Site of Nature Conservation Interest. To the east of the site lies the Green Belt.
178. In May 2014 a full planning application for 189 dwellings was submitted. During the determination process the number of dwellings increased to 204 and the application was permitted in March 2015. The applicant is in the process of selling-on this opportunity.

Vision

179. In accordance with the Council's adopted Concept Statement residential redevelopment in the C3 use class that works with the topography of the site to present an attractive new area of townscape that is conscious of its wide field of visibility and heritage and ecological significance of its context.

Policy SB12 Former MoD Warminster Road

Development Requirements and Design Principles

- 1) Provision of at least 150 residential dwellings to enable the efficient use of the developable area.***
- 2) Removal of the existing disused buildings which are utilitarian in appearance and detract from the setting of the World Heritage Site and the character and appearance of the Conservation Area.***
- 3) Development should be almost entirely focused on the previously developed area but there is scope for some very minor fringe development outside the fence line.***
- 4) A design response that enhances the setting of the World Heritage Site and the character and appearance of the Conservation Area. Achieving the most appropriate design approach will require detailed examination of the site context. Applications will be expected to demonstrate, through character appraisal and a thorough understanding of the evidence base, how their proposed scheme responds to the site. Key issue include***
 - a) the sites important location within the World Heritage Site;***
 - b) sloping topography;***
 - c) important views over, out of and into the site;***
 - d) the landscape and ecological value of the green canal corridor;***
 - e) significant trees within the site and significant trees and grassland in the open area***

adjacent the canal corridor;

- 5) *Provision of land and others funds to enable the expansion of the adjoining primary school to meet the educational needs of development*
- 6) *Creation of walkways through the undeveloped part of the site to formalise and improve public access to the Site of Nature Conservation Interest, lying beyond the fence line.*
- 7) *Protection the amenity of neighbouring residential properties*

Former MoD Ensleigh



Context

180. The former Ensleigh site is approximately 10.35 hectares in size and is located on the east side of Lansdown Road, bounded to the south/east by Granville Road and to the west and north by school playing fields and farmland. To the south the land falls away towards Bath and the escarpment rising up from Charlcombe, and to the east towards the Woolley/Swainswick valley. To the north the land is flat, forming the plateau area that comprises part of the wider setting for the city. The site comprised a range of predominately single storey buildings used for office purposes, a number of which have been demolished. Those that have not will be vacated by 2018. Surface car parking was provided within the site, with vehicular access from Granville Road and with an unused access from Lansdown Road.
181. The site is located within the boundary of the City of Bath World Heritage Site and adjoins the Cotswold AONB and Green Belt to the north, with the City of Bath Conservation Area boundary located on the west side of Lansdown Road. To the north/west of the site is Beckford's Tower (a Grade I listed building and which provides panoramic views across Bath and the surrounding countryside) and the grounds of a consecrated Victorian cemetery on Lansdown Road with listed cemetery gates (Grade II*). Ensleigh House

(situated on Granville Road) is a Grade II Listed Building. Further to the north west of the site are playing fields, Lansdown Park & Ride site and Bath Racecourse.

182. The site is subject to two planning permissions, one to the south of Granville Road for 39 dwellings and another on the main part of the site for 251 dwellings.

Vision

183. In accordance with the Council's adopted Concept Statement, development that together with that on the neighbouring former Royal Playing field provides a new community, sensitively designed given its exposed position and which benefits from its own on-site primary school

Policy SB13 Former MoD Ensleigh

Development and Design Principles

- 1) **Up to 300 dwellings**
- 2) **The development of the former MoD site shall be determined against the same principles established within Core Strategy Policy B3b for the extension to the former MoD Ensleigh Site on the Royal High playing field land.**

Royal High Playing Field

Policy B3b Extension to former MOD, Ensleigh

Land adjoining Ensleigh MOD site as shown on the Key Diagram is identified for the development of around 120-100 dwellings during the Plan period. ~~The Placemaking Plan will allocate a site for comprehensive residential led mixed use development comprising the Ensleigh MOD site and the land adjoining it.~~ The planning requirements relating to the land adjoining the Ensleigh MOD site are set out below.

- a Residential led mixed use development of around 1200 dwellings ~~in the plan period.~~**
- b ~~Be developed to a~~ Enable the comprehensive Masterplan for redevelopment the wider Ensleigh MOD site ~~and in accordance with the Council's Concept Statement for the MoD Ensleigh site.~~ The wider site should be more self-contained with its own local facilities. Development should reflect best practice as embodied in 'By Design' (or successor guidance) ensuring that it is well integrated with neighbouring areas.**
- c Development phasing should start with the current MoD Ensleigh site.**
- d Ensure that the principles and benefits of Green Infrastructure contained in the Green Infrastructure Strategy and other guidance and best practice are embedded in the design and development process from an early stage. Key requirements include provision of habitat connectivity through the retention and enhancement of the existing high valued habitat; provision of well integrated green space (formal, natural and allotments); provision of well**

integrated Sustainable Urban Drainage Systems; and provision of cycle and pedestrian links through the site connecting to the existing network particularly towards Bath city centre and Weston and Larkhall local centres.

- e Appropriate site assessment and ecological surveys to be undertaken to inform site master planning with particular attention to the SNCI and potential impacts to Bradford-upon-Avon bats SAC.*
- f Identify and assess the landscape character, landscape features and significant view points and the likely effects of development on them. Protect and enhance these aspects and mitigate to avoid or minimise the effects. Significant aspects of landscape include the Cotswold AONB; the World Heritage Site and its setting;
Bath Conservation Area and its setting; the character of the Lansdown plateau; trees including ancient woodland, tree belts, hedges and field patterns; Lansdown Road and its open rural character; and tranquillity. Significant viewpoints include local properties; Upper Swainswick; Beckford's Tower; Lansdown Road; and local Public Rights of Way.*
- g Assess and evaluate any direct or indirect impacts on designated heritage assets and their visual/landscape settings. Prepare and implement management schemes (including avoidance or physical separation) in order to mitigate the impacts of development and ensure the long-term protection and enhancement of the designated heritage assets and their settings. Designated heritage assets potentially affected by development at this location include Beckford's Tower (Grade I), Enleigh House and Lansdown Cemetery Gates (Grade II), Bath Conservation Area and Bath World Heritage Site.*
- h Assess and evaluate any impacts on non-designated heritage assets. The degree of harm to or loss of non-designated heritage assets will be balanced against the positive contribution made by the development and the extent to which harm/loss can be mitigated. Non-designated heritage assets of equal significance to designated heritage assets will be subject to the same considerations as designated heritage assets. Non-designated heritage assets potentially affected by development at this location include Bronze Age barrow cemetery, Roman road and roadside burials, and medieval settlement and chapel.*
- i The assessment and evaluation of the above designated and non-designated heritage assets should also consider their cumulative or collective "group value" and also understand the heritage assets' relationship to other environmental considerations.*
- j Ensure good public transport provision.*
- k Development should scope potential for and incorporate renewable energy.*
- ~~l Educational needs generated by the development must be met; a primary school is to be provided on the former Royal High Playing Field site comprising the Enleigh MOD site and the land adjoining it, unless an alternative solution can be found and agreed with the Education Authority.~~*
- m Provide integrated waste management infrastructure.*
- n Ensure that displaced playing pitches are re-provided at an appropriate and suitable location.*

Twerton Park



Context

184. This site is currently occupied by Bath City Football Club. The adjacent car park is also used for the weekly.

185. Twerton Market. The future of the Club has been uncertain for a while but the pursuance of a Community Buyout Scheme is on-going

Policy SB15

Vision

That the Club maintains its presence on its current site whilst being able to pursue the partial redevelopment of its land holdings. This could include the redevelopment of the stands to the north of the pitch, to include retail, commercial space and of housing, as well as facilities for the football club as required, or simply a partial development of part of the car parking area.

Development Requirements and Design Principles

Any change within Twerton Park should seek to enhance the facility and Twerton High Street as a local centre, where possible, by enhancing local retail or commercial leisure provision. There is also significant scope for the associated residential redevelopment of the site.

Hartwells Garage, Newbridge



Context

186. The site is just under 1.7ha and is currently occupied by Hartwells of Bath garage and Hanson Aggregates concrete batching plant. It is situated in an old quarry and is formed of two parts distinguished by a very sharp level change of 7 metres. The upper portion of the site, fronting Newbridge Road is occupied by the Hartwells Citroen showroom. The lower portion of the site contains associated workshops for vehicle servicing, repairs and MOT testing and also provides overspill parking associated with the garage; the west portion of the lower area contains the aforementioned concrete plant. The south of site is constrained by sewer main easement and is also prorated as part of the alignment of a protected sustainable transport route (formerly the route of the Midland Railway).
- 187 Planning permission was granted for a replacement car showrooms and workshops at Bath Business Park, Peasedown St. John, in December 2013 and January 2014. These have not yet been implemented yet there is a reasonable prospect that the Newbridge site will be redeveloped in the plan period. Indeed, the Group submitted a planning application for 264 student bedrooms on this site in that was withdrawn in November 2014. The site was also subject to a Certificate of Appropriate Alternative Development for residential development in 2009.

Policy SB16

Vision

Residential redevelopment, not including student accommodation, that makes the most of the sites location on sustainable transport routes , is sympathetic to the Victorian context of

terraced housing on the Upper Bristol Road and conscious of its appearance from higher ground.

Development Requirements and Design principles

- 1. Residential development of around 80-100 dwellings, which could include specialist older persons housing. Alternatively nursing home bedrooms could also form part of the residential mix but not student accommodation.***
- 2. On the upper part of the site, the Upper Bristol Road street frontage should be filled with a house typology (which could be arranged as houses or flats inside) and the articulation of facades and roofs should help to help these buildings integrate with the surrounding context.***
- 3. An apartment typology would be appropriate for the lower part of the site and enable efficient use of it. This typology should have a comfortable scale with the surroundings, both existing and proposed. The view of the site from Kelston View amongst others is an important consideration in relation to the setting of the Conservation and the impact on the OUV of the WHS.***
- 4. A design response that recognises the importance of the disused railway line as a connective habitat particularly as dark corridor for bats.***
- 5. Ease of access to any upgrade of the disused railway line as a cycle route.***
- 6. If development is phased then the design response on phase 1 (likely the garage) should not prejudice the achievement of goods design and the efficient use of land within phase 2 (likely the concrete batching area)***

Former St Mary's School, Burlington Street



Context

187. This is a site of 0.13 ha on the southern end of the west side of Burlington Street that is currently used as car parking for St Mary's Church. A horse chestnut tree protected by a preservation order fills part of the frontage of the site.
188. Burlington Street is on a slope rising northwards from Julian Road and is on a central axis with Portland Place which is located at the head of the street. The west side of Burlington Street consists of a late Georgian terrace of four houses which are 'typical' in their form and materials with three storey and a mansard roof and dormers and basements. The northern end of this terrace returns at 45 degrees to form one of the southern elevations of Portland Place. The east side of Burlington Street is a complete terrace running the full length of the street stopping short of Julian Road. This terrace is similar in form and scale but the treatment of the elevations are different. All of the Burlington Street buildings and the southern part of Portland Place are Grade II listed. The northern section of Portland Place on the high Pavement is Grade I listed.
189. There is no evidence that the existing terrace Burlington Street was ever completed. There was a riding school on the site in the 18th Century, built around a central courtyard and the site was subsequently bought by the Church. However, the tooth edge to the ashlar at the southern end of the terrace indicates that at the time of building there was an intention to extend the terrace

Policy SB17

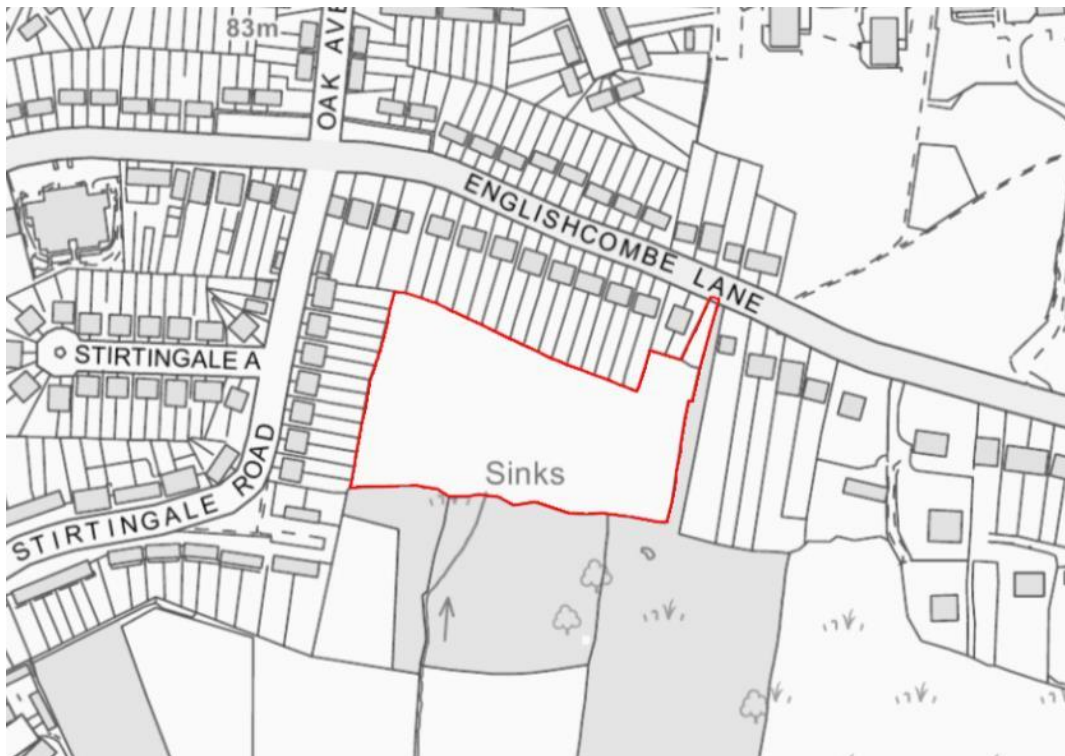
Vision

An extension of the terrace within the constraints of the site and its setting, which include the position of the mature tree (which makes a positive contribution to this part of the conservation area), and the degree to which the existing terrace can be extended without comprising the character of the original terrace. There is also scope to use part of the site for a community hall linked to the church and to investigate the potential for a small amount of mews style /coach house development with the car park, whilst retain sufficient parking for the church.

Development Requirements and Design Principles

- 1. Residential development, which on this site can include student accommodation.***
- 2. Provision of community space if required by the Church***
- 3. Protection of Horse Chestnut tree (TPO)***
- 4. An extension of two buildings would protect the horse chestnut street and not dominate the original terrace.***
- 5. Special attention should be paid to be taken the treatment of all the elevations.***

South of Englishcombe Lane



Context

190. This is an undeveloped plot of around 1.4ha to the north of Stirtingale Farm SNCI and to the rear of Englishcombe Lane and Stirtingale Road. The site is secluded from most public views and is subject to topographical, geotechnical, and ecological issues.

Policy SB18

Vision

Suburban residential development that makes efficient use of the site

Development and Design Principles

- 1. Around 40 dwellings***
- 2. Vehicular access from between no.s 87-89 Englishcombe Lane, retaining as many trees as possible and replacing those that is lost, elsewhere within the site.***
- 3. Retention of hedgerows along the boundaries of the site.***

Royal United Hospital

191. Located in Weston, the Royal United Hospital (RUH) is a major acute hospital and sub-regional healthcare facility serving 500,000 people within B&NES, Wiltshire, Somerset and South Gloucestershire. It is managed by the Royal United Hospitals Bath NHS Foundation Trust, which acquired the Royal National Hospital for Rheumatic Diseases (RNHRD) located in the centre of Bath, in February 2015. It is now managing all the services offered by this specialist provider.
192. As well as being the main provider of healthcare services it is also the largest employer in Bath & North East Somerset with around 5,000 staff.
193. Research and development continues to underpin the high quality, evidence-based care delivered both at the RNHRD and the RUH. The recent affiliation of both research teams has served to create a significant health research resource in the City of Bath, and one of the largest R&D portfolios in the country strengthened further by its links to other local research institutions such as the University of Bath. This supports the Trust's strategy to develop its R&D and be 'best in class' and provides additional income generating opportunities.
194. Future housing and population growth as planned within the sub-region and other demographic factors such as an ageing population places increased demands upon acute healthcare infrastructure and services.
195. The Trust has carried out a comprehensive review of its estate and agreed a strategic plan (known as the Estate Strategy 2014). The purpose of this is to direct investment and estate renewal, to improve the quality and standard of accommodation, respond to changing service needs for patients and staff alike and to comply with the necessary legislative standards.
196. The Trust's priorities are to provide fit for purpose accommodation, demolishing unsuitable and outdated buildings, improving the sustainability of the Estate, co-locating functions to cluster complimentary uses, delivering a parking strategy that will improve on-site parking, improving wayfinding throughout the site, reducing off-site parking impacts and encouraging the use of sustainable modes of travel.
197. Central to delivering the Trust's long term vision and objectives is an overarching car park strategy for the campus that improves the current parking arrangements across the site (numbers, rationalisation of car parks and sign posting) and supports the vision as set out in the Estate Strategy.
198. The Estate Strategy (2014) [INSERT HYPERLINK] specifically sets out the proposed RUH North Redevelopment programme over the next five years supported by a phased masterplan. These phases are as follows:-

Phase 1:
 - a) Proposed new replacement pharmacy with aseptic services
 - b) Provision of new visitor and patient car park located immediately adjacent to the front

entrance (Gate 1)

Phase 2: A new Integrated Rheumatology and Therapies Centre including hydro pool and gym

Phase 3 A new Cancer Centre - a new state of the art facility set within an enhanced greenspace for the campus”

199. The Council will support investment in the development of the hospital to meet the need for healthcare infrastructure, and endorses the approach adopted in the Estate Strategy. Beyond the time period of the current Estate Strategy, the Council will safeguard land within the campus of the RUH for future healthcare infrastructure, unless it can be demonstrated that the RUH can successfully provide its services and operate its site from a smaller land area.

RUH Green Infrastructure Plan

200. The RUH has also produced a Green Infrastructure Plan that supports the Estate Strategy by setting out a high level vision or framework for the site. This vision is to create a high quality, accessible ‘place’ with Green Infrastructure as an intrinsic element, for the benefit of staff, patients and visitors. This recognises the well-established benefits to health and well-being provided by access to natural green space. The Green Infrastructure vision is based upon the existing Estate Strategy masterplan and establishes a set of principles to inform the design of each phase. The GI Plan identifies green infrastructure including:

- specific landscape
- amenity and biodiversity opportunities
- the types of places that can be created to improve the quality of environment and maximise the health and wellbeing benefits for staff, patients and visitors.

201. Specifically, the Trust identified a number of considerations including:

- 1) Providing enhanced green infrastructure to improve the quality of care and clinical performance
- 2) Increasing biodiversity opportunities and habitats within the site linking into the wider surrounding green corridors
- 3) Investigate potential sustainable urban drainage features within the site
- 4) Creating a legible hierarchy of interesting, linked, usable, wildlife friendly and quality landscaped spaces opportunities for staff, patients and visitors alike
- 5) Create accessible open spaces with a range of micro-climates i.e. shaded areas in hot weather.
- 6) Encouraging exercise within the site and improving the connections between existing pedestrian and cycling routes through the site and to GI assets beyond the site.
- 7) Maintain, improve and expand the existing external ‘destination’ spaces
- 8) Identify opportunities to integrate The Trust’s art strategy
- 9) Consider the cost effectiveness of future Estate maintenance

[INSERT CONCEPT DIAGRAM / GREEN INFRASTRUCTURE PLAN FROM RUH]

201. This approach responds to the placemaking objectives of the Council, and its approved Green Infrastructure Strategy [LINK] and is therefore broadly supported by the Council.

POLICY APPROACH SBxxxx

- 1. The Council supports the improvement of this essential healthcare facility, including the principles and proposed building programme, and proposals for car parking, as set out in its Estate Strategy 2014.**
- 2. Development proposals will be expected to respond to and to implement the Green Infrastructure Plan as highlighted above.**
- 3. Proposals for non-healthcare uses on former RUH land should provide evidence that the land will not be required for healthcare provision or parking during the Plan period.**

2f Bath's Universities

~~2.36 The Council seeks to enable the continued success of The University of Bath and Bath Spa University and the contribution they make to the city's identity and profile.~~

~~2.37 The development of new academic space and student accommodation are matters that require policy direction in the Core Strategy. The Council is mindful that the growth in student numbers during the last decade has not been accompanied by sufficient on-campus study bedrooms and that the associated expansion of the student lettings market has diminished the 'normal' housing stock of the city. This is particularly significant given the relatively small size of Bath as a host city for two universities. The proliferation of Houses in Multiple Occupation (HMOs) in the Oldfield Park/Westmoreland area is the most visible consequence of the mismatch between the growth in students and on-campus development.~~

~~2.38 The Council also understands that each institution needs to invest in its academic estate in order to continue to provide high standards. The approach of the Core Strategy is to enable the realisation of a better balance between the aspirations of each university, the concerns of communities and the overall functioning, performance and environmental quality of the city and its setting. The University of Bath's and Bath Spa University's work in preparing and consulting on estate and campus masterplans demonstrates the value of proceeding on a strategic basis and provides a framework for future development. The Information Paper on student numbers and accommodation considers the issues in more detail, provides a full assessment of the evidence that has led to the following policy approach and its likely impact.~~

~~2.39 It is anticipated that this policy will enable the delivery of new on-campus study bedrooms to 2020/21 at a rate which broadly matches the growth of the student population. Based on estimated forecasts of growth, it will enable a modest increase in the student population (compared to rates experienced since 1997), enable all first years to be offered a place in managed accommodation, and potentially lead to a small contraction of the student lettings market—subject to accommodation preferences. To achieve a more significant contraction in the student lettings market would require significant amounts of valuable land within the city to be developed for student accommodation. In order for the vision for Bath to be realised this land will be needed for 'normal' housing and other commercial uses.~~

~~2.40 It is envisaged that this approach could mean that 2012/13 levels of HMOs will represent the high watermark within the city. The Council has declared an Article 4 direction in relation to HMOs to manage the student lettings market in the south west part of the city and elsewhere. The Council cannot apply HMO powers retrospectively.~~

~~2.41 Growth beyond 2020 will require additional on and off campus capacity to be identified. No alterations to the Green Belt boundary beyond that previously made in the Local Plan are envisaged during the Core Strategy period. However, the nature of exceptional or very special circumstances is that they cannot be predicted and the Council will need to consider such circumstances, on their merits, at the time they are presented.~~

202. As part of the Placemaking Plan process the Council has reviewed and updated Section 2F of the adopted Core Strategy (2014), which, has already become out-of-date in respect of the evidence base on the growth aspirations of the Universities, the consequent demand for accommodation and the potential impacts thereof if realised. Whilst the planning strategy remains the same as previously, its anticipated outcome is unlikely to enable that which was previously supposed. The cumulative growth aspirations of the Universities and the related implications for student accommodation have increased since the adoption of the Core Strategy.
203. The Council seeks to enable, as far as possible, the continued success of The University of Bath and Bath Spa University and the contribution they make to the city's identity, profile and employment base. They also make a wider contribution to the UK economy by contributing to the maintenance of a skilled workforce. Provision of student accommodation is a high priority for the Universities and the Council also understands that each institution aspires to invest in and spread its academic and administrative estate in order to continue to provide high standards, in what is becoming an increasingly competitive higher education market.
204. However, their development requirements and aspirations form part of a whole suite of demands on a highly constrained city, which is a relatively small as a host for two universities and with a limited land supply for meeting its overall development needs. Thus difficult choices need to be made.
205. At the time of the preparation, examination and adoption of the Core Strategy in 2013/14 it was thought that the combined published growth forecasts/corporate plans of both institutions (which in combination were somewhat 'cooler' than the growth rates achieved prior to 2011), and the student accommodation needs so generated could be met alongside the city's other objectively assessed development requirements and priorities (via a combination of mainly on-campus development, supplemented by some additional off-campus development) and without the need for the already high proportion of student HMOs to increase (albeit student accommodation preferences might result in an actual increase). The extent of the challenge was a need for around another 2,400 bedspaces, most likely needed by September 2020. The significance of attempting to hold 2011 levels of student HMOs as a high watermark is explained later in this section.
206. Those needs related primarily to the growth of the University of Bath. The evidence for Bath Spa University was that it would remain at about the same size and would thus not generate any further pressures for student accommodation. It was recognised that to achieve an actual contraction in the baseline student HMO market (to redress past expansion) would require significant amounts of scarce and valuable land within the city to be developed for post first year student accommodation. In order for the vision for Bath to be realised it was clear that such land would be needed for the delivery of 7,000 additional 'normal' dwellings and other commercial uses, not least office space to provide employment opportunities for population growth – not only in Bath but across the District and due to functional linkages, its environs.
207. Since the adoption of the Core Strategy combined enrolment aspirations have

increased markedly, as set out in detail in the annually updated Student Numbers and Accommodation Study (November 2015 update). In particular, the lifting of the student admissions cap by Government means that Universities can now recruit as many students as they like and both aspire to respond to this freedom. This means that the challenge of accommodating the associated need for student accommodation has also increased. The increased challenge relates primarily to a new programme of growth for Bath Spa, but the University of Bath's aspirations and forecast accommodation needs (including an increasing rather than stable ratio of students in need of accommodation to total students) have also been revised upwards.

208. Moreover, only aspirations to the beginning of September 2020 have been provided in evidence from each University. That is not unreasonable as few institutions plan corporately based on the full timeframes of a Development Plan, but it is quite possible that further growth beyond 2020 will be aspired to, if aspirations to that point, or thereabouts are achieved. The numbers to 2020 present enough of a challenge without speculating to 2029, although for comprehensiveness the conclusion of long range projection of history trends are presented as part of the data below.

209. Summarising a snapshot of the combined position set out in the Student Numbers and Accommodation Study (2015) is difficult as there are discrepancies between publically available HESA data (which is presented in a consistent format) and the data provided by the Universities during the preparation of the Plan. Further Bath Spa's plan evidence is set out in the form of on FTEs rather than actual students.

- Based on the data provided in evidence, at **2011/12** there were around 14,000 registered students at Bath University and around 6,000 FTE students at Bath Spa (most likely equating around 8,500 actually registered students). That is around **22,500 registered students**. The more important number from an accommodation perspective is somewhat less than this due to deductions that are made for a number of reasons e.g. distance learners, industrial placements and 'writing up', and full or part timers living with parents or with spouses. Each institution has a different profile related to these matters. Based on the evidence analysed a residual figure of around **15,700 students emerges as being in need of accommodation** (in a dedicated accommodation block or in an HMO in Bath during term time). That is around 70% of registered students.
- As of **2014/15** (the latest academic year for which data is available for UoB) there were around 15,500 registered students and UoB. At BSU there are around 6,600 FTE students (most likely around 8,200 total students based on HESA data for 2013/14 (with 2014/15 not yet released). The ratio for BSU has increased to 80% since 2011/12 due to a significant reduction in part time registered students). In combination that is around **23,700 registered students** (+1,200). The **accommodation requirement** falling out of this has increased to around **17,600** (+1,900 – and more than the total increase due to the changing composition of enrolment re full and part time). That is around 75% of total registered students. Moreover, 17,600 students represent around 20% of the population and that is high compared to other centres of higher education. Bath as a city can be said to be doing a lot already in enabling the success of the higher education sector relative to its size

and circumstances. For example neighbouring Bristol's two Universities have around 47,000 students in 2013/13, yet the 2014 mid-year population estimates for the urban area of Bristol (i.e. Bristol City Council and two thirds of the South Glos population) was 622,00). If 80% of the students are in need of accommodation (37,600), that is only 6%.

- For the **2020/21** academic year The University of Bath aspires to increase registered students to 19,300 (5,300) and Bath Spa University aspires to increase FTEs to around 10,500 (+4,500) (probably equivalent to around 13,000 registrations, again +4,500). The combined aspirations are therefore for **registered students to increase to around 32,300** by 2020/21 and this would see numbers rise by 9,800 or 43% on 2011/12 levels). Although the Universities aspire to reach these levels by 2020, they would of course settle for eventually getting there as soon as possible thereafter, rather than not at all. If achieved this would see annual accommodation needs for UOB increase to 15,000 (+4,700) and for BSU the need would increase to around 9,800 (+4,400). In combination the need would increase to **around 24,800** (9,100 and +58%).
- The Council has taken into account dedicated new supply (on and off-campus) that has been built since 2011, that which is under construction or is permitted, and estimated additional capacity of not more than 1,000 within specific areas currently shown for accommodation development in the University of Bath masterplan (2014 update). In total this yields around 3,900 bedspaces (2,100 to UoB and 1,800 to BSU). Whilst some new bedspaces are available exclusively to BSU, a further 885 bedspaces that are built, under construction or permitted are currently available to any student, and it is assumed that each institutions students claim a half share. Property deals could change that assumption.
- This leaves a residual need of around 5,200 bedrooms (split evenly between each institution) in relation to 2020/21 aspirations.

- That is equivalent to a need for:
 - around 1,300 HMOs to September 2020, or if that is to be avoided
 - around 11 more city centre type Green Park House developments (461 beds in 13,500 sq.m. i.e. 148,500 sq.m. overall) or,
 - around 15 more out-of-centre type Twerton Mill Developments (327 beds on 8,700 sq.m. i.e. 130,000 sq.m. overall)
 - that is an opportunity cost of around 1,700-1950 normal apartments or 60,000 sq.m. of office space and 900-1,150 apartments, and the affordable housing component could be secured

- These numbers would of course increase significantly if the trajectory of aspiration continues to 2029. For the University of Bath alone it would increase by a further 5,500 bedspaces (1,375 HMOs or a further 12 Green Park House Developments) of the long term annual rate of growth of around 4% is projected forward.

210. The development of new academic space and student accommodation are clearly matters that require policy direction in the Local Plan at a strategic and site specific level. The Council is mindful that the growth in student numbers has not been accompanied by sufficient on-campus study bedrooms but that the associated expansion of the student lettings market (which the PPG allows as part of the

solution to student housing issues) has diminished the 'normal' housing stock of the city, cancelling out, in part, gross additions to the stock. Whilst a student HMO sector is a common feature of University towns its current size in relation to Bath is already a cause for concern and the idea of it increasing exacerbates concern to many interest groups including residents associations and those seeking to secure a house to rent or buy. The issues relate to the retention of mixed neighbourhoods in the city and also the maintenance of the housing stock of conventional stock of residential properties from a strategic perspective.

211. In presenting this analysis it is crucial to understand that the District's housing requirement of 13,000 and the quantum that is to be delivered at Bath (7,000) relates to non-student dwellings only. Whilst the NPPG states that student housing can count towards a housing requirement, that is only logically the case, as recognised by the Core Strategy Inspector, when that requirement itself includes a component of student housing (as a bed space equivalent). In B&NES that is not the case. Student housing needs are a separate component of specialist demand in the form of bedspaces and on the evidence above are clearly volatile.

In-city Student Accommodation Blocks

212. Whilst the PPG also states that student accommodation can be counted based on the amount of housing that is released, that only holds true if the Universities are not growing and not using that new accommodation to achieve that growth. Where this is the case, new accommodation to enable more recruitment can simply 'fan the flames' of the HMO housing market by generating ever increasing demands for follow-on accommodation (i.e. more demand for HMOs or further accommodation blocks). There is currently no evidence of the HMO sector in Bath contracting as a result of the development on in-city accommodation blocks. There is always an opportunity cost of allowing student accommodation blocks with the city. Up to a point this cost is manageable as it does not impact upon the achievement of the city's overall development programme as set out in Policy B1 of the Core Strategy. However, beyond a certain point, the opportunity cost of developing too much land in the city for student accommodation blocks becomes harmful. A number of in-city private sector accommodation projects have been permitted since 2011, but prior to the adoption of Core Strategy Policy B5.

213. The risk identified is not helped by the fact that student accommodation is currently perhaps the most lucrative form of real estate investment and is therefore often the most commercial attractive option to landowners . There is a risk that without a suitable planning policy framework, this sector will squeeze out the achievement of other requirements and that change in Bath will become focused too much on housing a transitory learning population (not all of which will go on to use their skills within the UK economy) than housing a more permanent and working population and achieving employment space and affordable housing outcomes. Further, even if a new accommodation block did measurably (as opposed to in theory) release some HMOs back to the stock this would not be a release of affordable housing, and the affordable housing that could have been provided on the student accommodation site will have been forgone.

214. In the Council's analysis there is not the land within the city ('city' does not include on-campus land) to enable the aspirations of the Universities without significant negative effects on other priorities – hence the approach set out in Policy B5 of the Core Strategy. This is not a blanket moratorium on further student accommodation blocks within parts of the city to which it relates, but these will be limited to windfall sites that are not identified for other uses in the HELAA or allocated in the site allocations section of the plan. The site allocations section of the Plan identifies a number of sites that will change during the plan period within and outside Policy B5. Very few of the site allocations policies identify student accommodation as part of the land use mix – and other interested parties as well as the Universities, for example Bath City college or language schools, may be interested in that land. The LPA cannot control who secures the land.

215. This policy framework of prioritising the achievement of targets for other land uses will implicitly result in significant containment in respect student accommodation. It will likely direct even more attention to the further growth in student HMO market as a source of supply and to on-campus options. However, that too is constrained.

Houses Multiple Occupation

216. Relative to other places the proportion of the housing stock that has already been converted to student HMOs is very high, higher even than in Oxford. The proliferation of Houses in Multiple Occupation (HMOs) in Victorian terraces in the Oldfield Park/Westmoreland area is the most visible consequence of the mismatch between the growth in students and dedicated on-campus and off-campus accommodation development.

217. In July 2013 an Article 4 Direction was made to require a planning application for the change of use of a C3 dwelling to a C4 HMO in Bath. An accompanying SPD current applies a 25% threshold for streets/neighbourhoods in the city, after which permission will be refused. The existing concentration of HMOs in the Oldfield Park area has now reached that threshold (in many cases the threshold was already breached prior to the Article 4 Direction being made). Variations to the SPD can be made outside the Development Plan process to loosen or tighten the application of the Article 4 Direction in a targeted or city-wide way. Whilst there are HMOs in other parts of the city it is not clear whether landlords can/will increase their portfolios at the rate required to enable the Universities aspirations to be met. It seems unlikely that the unprecedented rate of increase that the Universities would require would take place given that the hotspot (Oldfield Park area) has no further headroom for growth and when it would require the market to colonise areas with housing type profiles and asking prices that are very different to the Oldfield Park area. Neighbourhoods on the edge of the hotspot are already nearly at the 25% threshold. Some further HMOs can be expected to be permitted. There have been 78 more HMOs permitted in the 29 months from July 2013 (32 per annum). That is far below the rate that would enable the Universities aspirations to be met.

218. Nevertheless, the conversion of a C3 dwelling to a C4 HMO is to be counted as a loss of a C3 dwelling housing in respect of monitoring net additional housing supply for the plan period and in respect of 5 year housing land supply, and these losses will

require corrective action at plan review if the 7,000 net dwellings target for the city is at risk. The SPD can be varied to manage the extent of change and the risk of that happening.

219. A significant increase in student HMOs in Bath to 2020/21 or beyond would put the achievement of 7,000 net additional dwellings at risk and put considerable pressure on 5 year housing land supply for the District. The Council would not view it as sustainable to make corrective action for 1,300 HMOs. It does not see any options for corrective action on the edge of Bath, not simply just for Green Belt reasons but in respect of the significance of the World Heritage Site. Further, making corrective action for that level of development further afield is significantly less sustainable than retaining that supply within the city itself. The situation will be monitored and the SPD for the Article 4 Direction reviewed and as deemed necessary.

On-campus Development

220. Site allocations polices have been made for the University of Bath campus at Claverton Down (including the Sulis Club) and for Bath Spa University campus (but not including Sion Hill for which generic development management policies will be used to manage change). The University of Bath's and Bath Spa University's work in preparing and consulting on estate and campus masterplans demonstrates the value of proceeding on a strategic basis and has provided part of the evidence base to inform planning policy for future development.

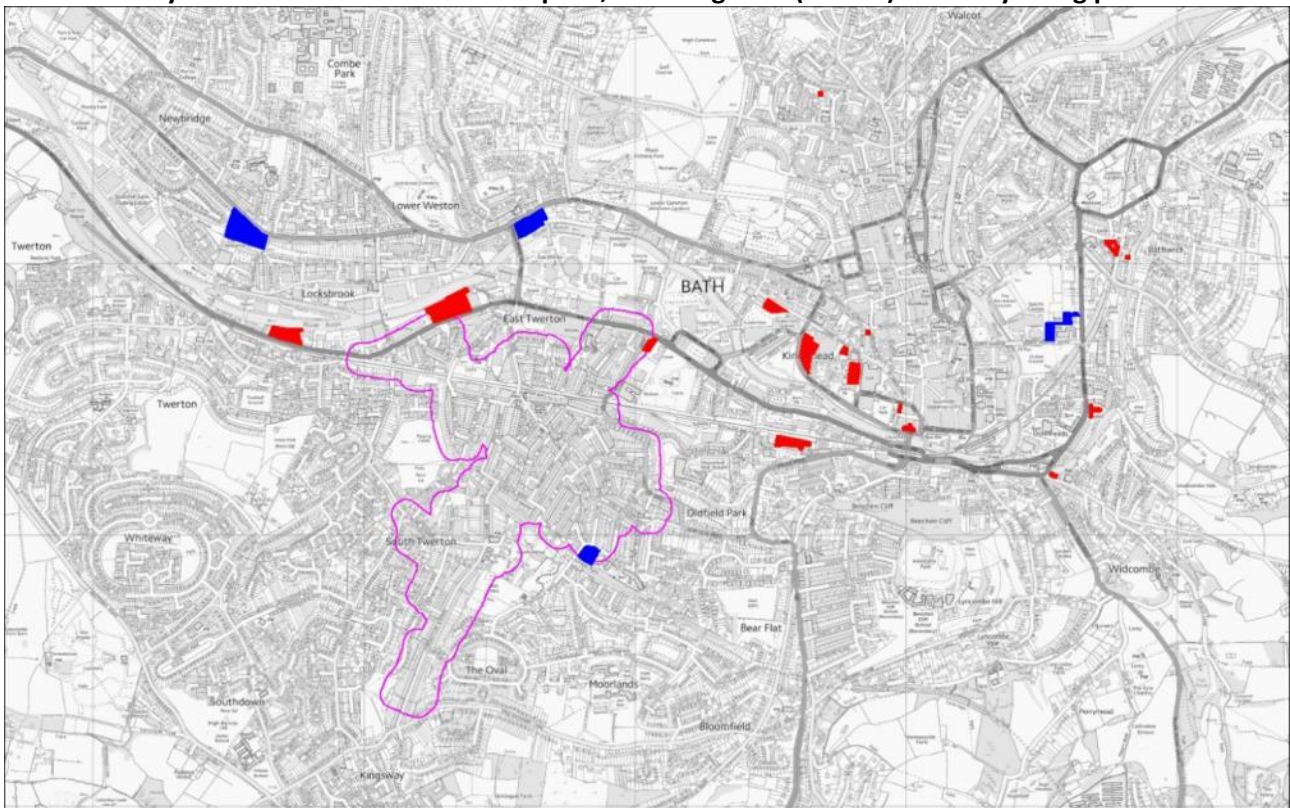
221. The University of Bath has it in its gift to utilise land that was removed from the Green Belt in 2007 , together with land within the core parts of the campus to enable it to achieve its aspirations for growth (in terms both of student accommodation and academic space). In respect of student accommodation beyond that which has been identified the masterplan, the site allocations policy enables significant change, but it is for the University itself to determine the balance it wants to achieve between non-green belt playing pitch provision and growth , and the rate of growth.

222. Bath Spa has less control over its future in respect of securing net additional student accommodation at Newton St Loe for the reasons set out in the site allocations policy. Further net additions to housing supply at Newton Supply (to that built since 2011) is unlikely although older stock can be replaced within the confines of NPPF:89. Whilst Bath Spa University has secured much of the purpose built housing that developers have had permitted in the city, this will not fully accommodate the growth envisaged for all year groups. No site specific deliverable solutions to enable further increases in housing supply specifically for Bath Spa can be identified in the Development Plan at this time. Any proposals would be dealt with on their merits via generic development management policies in association with Policy B5.

223. No alterations to the Green Belt boundary beyond that previously made in the Local Plan are envisaged during the Core Strategy period. However, the nature of exceptional or very special circumstances is that they cannot be predicted and the Council will need to consider such circumstances, on their merits, at the time they are presented.

224. The approach of the Local Plan is to enable the realisation of a sustainable balance between the aspirations of each university, the concerns of communities and the overall functioning, performance and environmental quality of the city and its setting. The city currently over performs as a host to higher education yet under performs in relation to employment space and conventional housing. These are the Plans priority land uses.
225. The overall strategy of the Development Plan is to enable the Universities to fulfil their ambitions, as far as possible, without those ambitions having a negative impact on the realisation of the Council’s wider strategic planning requirements for the city, nor an unacceptable environmental impact on the University campuses or their environs, nor an impact on the existing normal housing stock of the city. Whilst a number of in-city accommodation blocks have been permitted since 2011, the residual supply of land to 2029 dictates that further supply must be controlled in specific parts of the city where necessary (though not absolutely), otherwise the housing , affordable housing and economic strategies will not be deliverable. This also applies to teaching space. Bath is a compact city and there a few places that can be regarded as unsuitable in transport terms in respect of windfall student accommodation beyond the Enterprise Area and Central Area (albeit these are the most sustainable areas). There will be some further increase in HMOs within the city, and as a consequence of this, if the target of 7000 dwellings for the city is put at risk, compensatory housing provision would be needed at full Plan Review (2019/20) based on actual recorded changes in the stock of HMOs. The SPD accompanying the Article 4 Direction will be used to manage the growth of HMOs.

Current in-city student accommodation footprint, including sites (in blue) currently being promoted

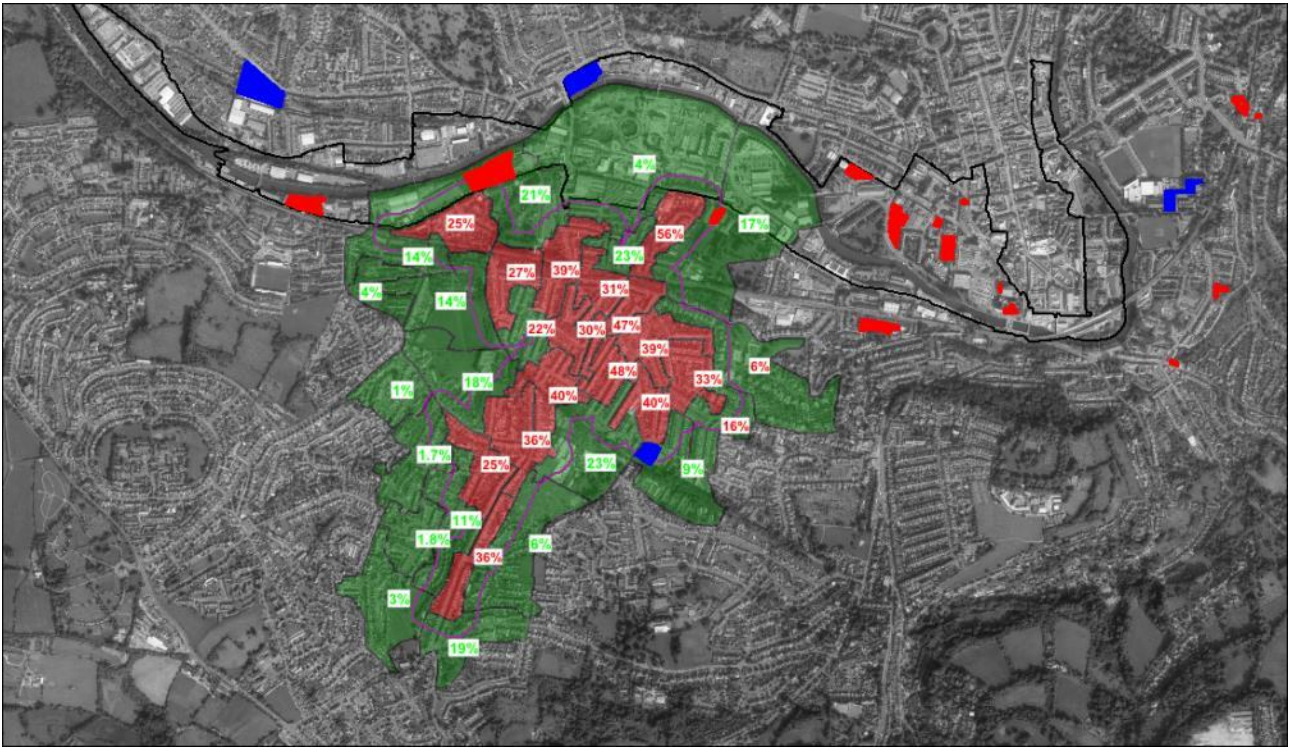


Red polygon – confirmed accommodation block

Blue polygon – current proposal

Purple line - Stage 2 test area for 25% HMOs exceedance. Permissions unlikely within.

Core HMO area (% HMO by lower SO area) – Nov2014 (to be updated to Nov 2015)



Policy B5 Strategic Policy for Baths Universities and their impacts on the Housing Market

Overall Approach

Planning decisions should enable, as far as possible, the aspirations of the University of Bath and Bath Spa University to be met, within the context of environmental sustainability and the need to deliver the full spectrum of other development requirements for the city, in the city.

University of Bath – Claverton Down Campus

The development and expansion of the University of Bath the strategy seeks, in accordance with saved Local Plan Policy GDS.1/B11 the development of about 2,000 study bedrooms and 45,000 sq.m. of academic space at the Claverton campus site allocations

Bath Spa University – Newton Park Campus

Within the context of a strategic framework for the University's entire estate the strategy seeks the redevelopment and intensification of the Newton Park campus to provide additional study bedrooms and academic space. Through the Placemaking Plan the Council will be reviewing whether the Campus should continue to be designated as a MEDS and, if so, its boundary. Proposals should accord with the NPPF, paragraph 89 and future local planning policy in the Placemaking Plan and seek to optimise opportunities for educational use and student accommodation within the current boundary of the campus or boundary of the MEDS if so defined in the Placemaking Plan before seeking to justify very special circumstances for development beyond them or a change to the development boundaries. In all circumstances regard should be had to the sites environmental capacity, the significance of heritage assets and the optimum development of the campus in this regard.

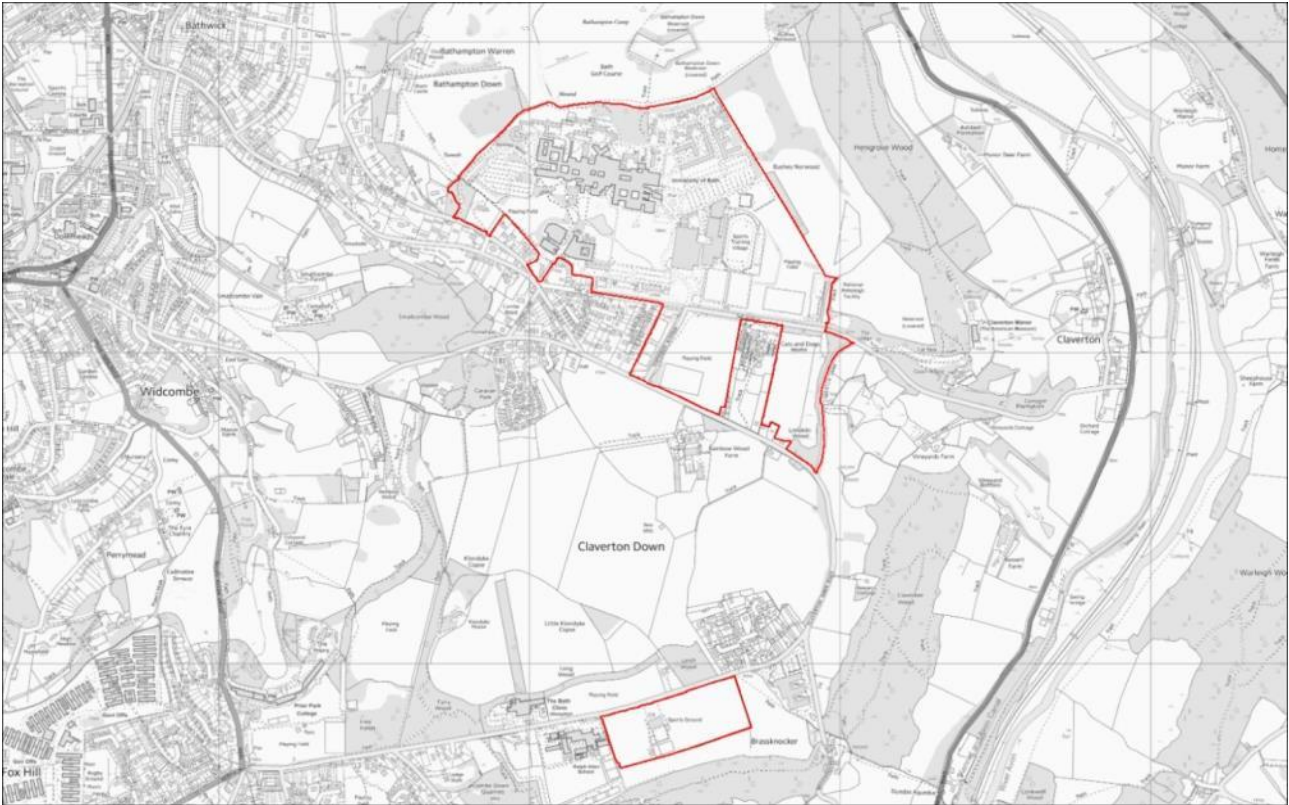
Off-campus Student Accommodation and Teaching Space

Proposals for off-campus student accommodation (whether in the form, C2, C4 or sui generis residential units) or teaching space will be refused within the Central Area and the Enterprise Area where this would adversely affect the realisation of the vision and spatial strategy in relation to for delivering housing, and economic development (in respect of office and retail space)

Housing Market Impacts

Between 2011 and full Plan review the number of C3 dwellings converted to C4 Houses in multiple occupation will be monitored and compensatory provision will be made if the achievement for 7,000 net additional dwellings for the city is at risk.

The University of Bath at Claverton down (including the Sulis Club)



Historical Context

226. Following the Robbins Report of 1963, which recommended immediate expansion of universities, the Bristol College of Science and Technology began to look at gaining university status. With the college rapidly expanding and no suitable site available in Bristol, the college was provided with a new home in Claverton Down, Bath. The first building on campus was completed in 1965 just a year before the Royal Charter was granted. It has since grown into a top flight British University for teaching, research, the overall student experience and has a strong international profile.

Environmental and Policy Context

The Main Claverton Campus

227. The main Claverton Down campus is within The City of Bath World Heritage Site. Its western fringes adjoin the Bath Conservation Area as it extends to the top of North Road and Bathwick Hill. The slightly detached University medical centre is within the Conservation Area itself. The very extreme eastern tip of the campus (the bobsleigh training facility) adjoins the Claverton Conservation Area, and the Claverton Manor (Grade II) historic gardens and pleasure grounds. Directly to the north is Bathampton Camp

Scheduled Monument, an early Iron Age hill fort of which the University campus forms part of its setting. The extensive Bathampton Down SNCI flows into the north fringe of the campus and a small geological SSSI exists along Quarry Road (the western approach to the campus). Other notable ecological issues relate to the Universities location close to the Bath SAC. Bushey Norwood (to the east) provides very important foraging for bats of many species, including those protected by the SAC designation and bats use routes around the universities perimeter. To the south, the University neighbours residential areas at The Avenue, North Road, Woodland Grove, and Beech Avenue.

228. Further, the campus is almost completely surrounded by the Cotswolds AONB, which in places flows into the campus itself. The Cotswolds AONB was extended in 1990 to include the valleys and plateaux around Bath. The wider topography and landscape of the Claverton Down/Avon Valley area is typical of the “Cotswolds plateaux and valleys” sub-type identified in the B&NES landscape character assessment SPD. The university campus was once an open plateau landscape firmly within this sub-type. However, with the progressive development of the university the character of this part of the plateau has been transformed. Moreover, since the extension of the AONB the character and appearance of the campus north of The Avenue has been subject to further heavy modification by construction of the buildings and enclosed pitches comprising the Institute for Sport as well as by the additional student accommodation just to the north of the AONB. This severely limits its present contribution to the qualities of the wider AONB.
229. The AONB within the campus contains the buildings of the Sports Institute, a running track, playing pitches (both to the north of The Avenue and to the south at St John’s Field and Lime Kiln Field), a car park and tennis courts. In his report, The Inspector examining BANES Local Plan (2007) observed that *“none of the areas exhibit the classic qualities of the AONB, although the playing pitches St John’s Field and Lime Kiln Field make a greater contribution to the AONB since they have a more apparent undeveloped nature and greater affinity within the open plateau sub type of the AONB”*. Indeed, in respect of openness, St John’s Field and Lime Kiln Field are that part of the main campus that remains within the Green Belt. Where the Green Belt designation was retracted in 2007 (to exclude the sports facilities and pitches to the north of the Avenue and the tennis courts to the west of Norwood Avenue) the examining Inspector also found exceptional circumstances (set out paras 9.35-37) for allowing University related development within the AONB within these locations. However, despite that in-principle backing, he advised that it was imperative that development within the campus be appropriately designed and landscaped in order to respond to the qualities of the wider of AONB. In particular, the design response would need to provide a sensitive edge to the campus in respect of Bushey Norwood and that a “landscape-led” approach should be a crucial guiding principle.
230. Within the core of the campus is a central landscaped area/parkland that is part of the original design concept and which is at the centre of a multi-functional green infrastructure network that flows through and around the campus. The whole campus is subject to a Tree Preservation Order, and some of the hedgerows on the site have been identified as important under the Hedgerow Regulations.
231. The main University campus is thus surrounded by a landscape of high environmental quality in terms of its natural beauty, historical context and setting, visual attraction and nature conservation value. Although the campus cannot be seen from the centre of Bath,

its hilltop setting means that it is visible from a number of vantage points in the World Heritage Site and Conservation Area (e.g. from Alexandra Park). Extensive tree cover surrounds the campus and therefore, much of it still appears in harmony with its landscape setting. Given its topographical setting and generally harmonious relationship with the landscape there is significant sensitivity to the visual impact of any new developments on both long distance views and also from the Bath Skyline Walk, which passes through AONB/National Trust land at Bushey Norwood on the eastern boundary of the campus. Residential areas of the city also adjoin the campus, particularly to the south and there are amenity issues to consider when making planning policy. This context and sensitivity presents an environmental capacity for the further development of the main campus

232. Indeed, the University's 2014 masterplan (see below) states that *"The vision for Claverton Campus is to ensure that landscape and ecology issues are intrinsic to any development which will take place as part of the future expansion of the campus, and that, this will serve to further enhance the University's reputation as a sensitive and diligent custodian of its landscape environment."* The University has also prepared a Strategic Landscape and Ecological Management Plan categorising existing and proposed landscape assets, setting out a methodology for their establishment and maintenance, and proposing a long-term vision for their management. It is therefore important that the Development Plan for B&NES includes policies that secure this ambition.

The Sulis Club

233. The Sulis Club is a 'satellite' recreational ground on the edge of the Claverton plateau with pitches, tennis courts and a clubhouse. It is also wholly in the World Heritage Site, Cotswolds AONB and Green Belt. It is neighboured to the east and west by the institutional buildings of Ralph Allen Secondary School and the HQ of Wessex Water. It also adjoins the Brassknocker SNCI. It was purchased by the University after the adoption of the B&NES Local Plan (2007), thus increasing playing pitch capacity from the 2007 baseline, which was a threshold for retained supply under that Local Plan. The purchase of the Sulis Club enabled the University to reduce playing pitch provision elsewhere on the non-green belt part of main campus site if it chose to do so. To date this has not yet occurred to any significant degree,

Previous Statutory Planning and Master planning

234. Historically the University of Bath prepared non-statutory master plans (in 1965, 1977, 1996, 2001, and latterly in 2009, further updated in 2012 and 2014) to guide the development of its estate. Not all development has been planned in advance, for example the Sports Training Village for English Institute of Sport was developed in response to an opportunity that arose, showing that not all change can be master planned in detail in advance and also that the appropriate level of policy direction needs to be flexible enough to respond to changing circumstances – often generated by funding opportunities. There was no site specific statutory planning policy for the campus until the adoption of B&NES Local Plan of 2007. Neither the Bath City Plan (1990) nor the Bath Local Plan (1997) contained any site specific policy reference in respect of the Claverton Campus.
235. The B&NES Local Plan (2007) was prepared and adopted at the same time that the University was preparing its 2009 masterplan. This looked at retrospective development

needs (taking into account a deficit in the academic floorspace per student ratio that had emerged over time) and longer term requirements, into the 2020's (whereas the Development Plan itself now looks to 2029). It was concluded by the examining Inspector that the, as then, non-Green Belt part of the campus was unlikely to have the environmental capacity to deliver the space that was needed. He utilised the findings of the Universities Environmental Capacity Report (2000), the views of statutory consultees and other interested parties at the examination and his own judgement based on a number of site visits. It was also concluded that Government's priorities for higher education, the Universities legitimate aspirations in that regard, the spatial requirements for meeting those aspirations and the lack of genuinely available or operationally suitable off-campus non-Green Belt land, amounted to exceptional circumstances for removing land from the Green Belt and developing in the AONB.

Green Belt (hashed line) and non-Green Belt (solid line) parts of the campus pre and post 2007



236. Policy (GDS.1/B11) of the former B&NES Local Plan (2007) set out that the Universities requirements should be met within the enlarged non-Green Belt part of the campus. It was high level in nature, and embedded a requirement for planning applications to be submitted within the context of a comprehensive scheme within a university-wide masterplan (hence the 2009 masterplan and subsequent updates, which of themselves were non-statutory, but material considerations to be given weight in respect of its degree on conformity with that policy). The content of the 2009 masterplan and 2012 and 2014 iterations/updates have not been fully tested by the LPA.

Placemaking Policy approach

237. Since 2007 Government's aspiration for Higher Education participation have increased (e.g. the removal of the admissions cap), the Council has introduced an Article 4 Direction which has constrained the growth of this sector (for follow-on student accommodation) and the land resource of the city has become ever more valuable and a diminishing asset in achieving the full spectrum of development objectives e.g. for conventional housing and employment space. The need to enable development on campus to avoid follow-on student accommodation demands having a detrimental impact on the city as a whole has come more sharply into focus. It is therefore considered that the judgements made by the

B&NES 2007 Local Plan inspector remain credible in respect of exceptional circumstances for amending the Green Belt and endorsing the principle of development within the AONB. His further conclusion that it was *imperative that development be appropriately designed and landscaped to respond to the qualities of the wider AONB* also remains valid.

238. The Placemaking Plan gives the opportunity (post NPPF) to improve the statutory approach to Development Management affecting this area. It achieves this by embedding within the Development Plan a suitably detailed framework for the development of the campus that includes a framework plan and an associated suite of design principles. It will mean that the most important decisions, that were previously devolved to a non-statutory master planning exercise (itself not subject a process of formal LPA approval) have been consulted on, examined and adopted under the full gaze of the statutory plan-making process. This will give a greater degree of certainty for all parties (The University, The Council, neighbouring residents and other interested parties) concerning future development.
239. Policy SB.26 is designed to be largely self-sufficient in enabling planning applications to be determined. It does not require a comprehensive supporting master plan to show where all individual future development projects can take place. The Development Framework plan of Policy SB.26 will provide a sufficient steer for that purpose. However, the undeveloped land within the AONB (to the north of the Avenue) is a special case and here, at least an outline application setting out a plan for the integration of this area in to the main body of the University campus and how effects on the AONB will be moderated, will be need to be permitted before individual projects can be determined. Within this context the University will continue to refine and develop the detail of its overall estates plan / masterplan, as it has always done, within the parameters of the policy framework, to explore differing ways of meeting its needs in response to changing circumstances. This work can be presented as part of supporting materials to planning applications. The greater the match between such a plan and the components of policy SB.26 regarding the placement of development in space, the greater the weight can be given to it as a material consideration. The detailed planning of the estate will also be useful as a means of presenting supporting evidence in an integrated way (for example in relation to the relationship of an individual project to the ecological, landscape and traffic management of the campus).
240. The Development Framework Plan identifies the general extent of the Claverton Down campus policy area (which comprises the core estate and a satellite site at the Sulis Club). It also identifies development zones within which further University related development may take place and areas that shall remain undeveloped. This Development Framework Plan together with the accompanying design principles, and the Development Plan as a whole, sets the context for the University to develop its plans for the evolution of its estate. The Framework Plan is not a rigid masterplan (as history shows that the detail of plans for the estate change over time) but rather provides a long term steer for change that can endure and within which there is flexibility.
241. All applications for major development would benefit from early engagement with the LPAs Development Team pre-application process. The pro-active planning of the campus between the LPA and the University will likely result in the most efficient and sustainable outcomes, not only for the campus itself, but for its setting and the city as a whole.

242. Should the University wish to pursue a future very special circumstances or exceptional circumstances case in respect of further development in the Green Belt or Green Belt release, this would need to be evidenced, in part, by a thorough and comprehensive three dimensional evaluation of non-Green Belt capacity, which is best presented in a detailed three dimensional master planning exercise, exploring the options that are available. This would need to be presented, tested, and examined within a subsequent phase of plan review or as part of a planning application process. Further Green Belt release is not regarded by the Council to be a legitimate argument at present due to that fact that the land that was released from the Green Belt in 2007 has not yet been utilised to any significant degree.

Policy SB.26 University of Bath at Claverton Down

Development Framework Plan

Claverton campus



Note: *dashed blue sites* represent development that has been completed since 2007 or in construction since 2007 that is not yet shown on an ordnance survey base map. These are not policy areas.

Sulis Club



The campus and policy area boundary is identified with a white line and the policy zones within it comprise:

- 1. *Purple Zones (with no hatching)* - areas of pre-existing development, including car parking, or fringe areas of the current central landscaped area, where redevelopment or new development for university-related uses is supported in principle. University related uses include space for learning, research and allied business incubation and knowledge transfer, conferences, university administration and IT and sports, health, creative arts, social, recreational and catering purposes and additional student residential**

accommodation.

2. **Purple Zones (hatched)** – largely sport related development, pitches, tennis courts and a car park within the Cotswolds AONB where university related development is also acceptable in principle, but where, to the north of the Avenue, at least an outline planning application will first need to be approved to establish a comprehensive platform for change (establishing the acceptable form and quantity of development and setting out how any negative AONB impacts will be moderated and how development will be integrated into the core of the campus, and its green infrastructure network) before detailed applications for specific projects are determined. This should be guided in part by the Cotswold AONB Management Plan, where relevant.
3. **Green Zone** - the long term future extent of a precisely defined central landscaped area (the University Park), which has an important green infrastructure function and provides the setting to many developed parts of the campus, shall itself remain as an undeveloped yet enhanced open space as the remainder of the campus intensifies.
4. **Yellow Zones** - areas within which proposals for development will be judged against national planning policy within the NPPF on AONB and Green Belt, as relevant.
5. **Clear Zones** - other undeveloped areas within the Claverton campus but outwith the University Park that shall remain free of development because of their multi-functional contribution to green infrastructure. This includes a 'hole' in the purple zone to the north of Wessex House. It will be necessary for clear zones to be established in respect of development affecting the purple hatched areas, guided by the general and area specific development principles, most notably in respect of the perimeter of the campus and the role this plays for protected species of bats. Linked to new development the clear zones should be invested in to maintain habitats and enhance their function.

General Development Principles

- a) Development on campus should contribute to the full spectrum of the University's needs, including academic space, all the accommodation space that is needed for the growth in the intake of first years, and a significant share of the accommodation space that is needed for their subsequent years of study.
- b) In all circumstances, development should optimise the efficient use of developable land within the campus to maximise its floorspace within the constraints that are present, and whilst achieving good design. The siting, orientation, height, scale and massing of buildings, the landscaping response and the design of the spaces between buildings shall be determined having regard to the criteria in this policy and of other relevant policies in the Development Plan. The flexibility and adaptability of buildings will also be assessed in determining the overall quality of design
- c) In all circumstances development will be assessed to determine the degree to which it affects the significance of the Bath World Heritage Site (by reference to the Bath World Heritage Setting SPD), the Bath Conservation Area, the Claverton Conservation Area, the Claverton Manor Historic Garden and the Bathampton Down Scheduled Ancient Monument (including by affecting their settings) and great weight will be given to

their conservation and enhancement.

- d) In all circumstances where development would be visible to views from within the Cotswolds AONB (at Bushey Norwood, Bathampton Down, and Claverton Down, or from within the Limpley Stoke Valley at places such as Warleigh and Conkwell), it should respond to this context and its visual impact shall be moderated with a suitable design response including suitable (immediate and longer term) mitigation measures, including any opportunities to enhance the AONB. Effects on the AONB will need to be evidenced in an LVIA, the scope of which should be set out in consultation with the LPA, Natural England and the Cotswold Conservation Board.*
- e) If under the terms of the NPPF in respect of Green Belt and AONB, development were to be evidenced as being acceptable in principle within the Green Belt or AONB through the demonstration of very special circumstances at St Johns Field, Lime Kiln Field or at the Sulis Club (the yellow zone), all general design principles will continue to apply in order to achieve good design and mitigate harm.*
- f) In all circumstances the design response should be evidenced as contributing positively to a campus wide strategy for green infrastructure, landscape and ecology (particularly in respect of protected species of Bats). These matters should be intrinsic to development, which should enable the creation protection, enhancement and management of networks affecting the campus. If it is necessary to cause harm to a network, this should be minimised and suitable compensatory measures must be made elsewhere on the campus.*
- g) In all circumstances development should enable sustainable transport choices to be made including bus use to and from the campus/estate and pedestrian and cyclist circulation to, from and within the campus/estate. This includes retaining but not increasing an operational level of car parking of not more than 2,000 spaces so as not to harm the patronage of sustainable transport modes, their viability, or cause additional car trips to and from the campus.*
- h) Decked parking as part of any reorganisation of parking supply and/or optimising development capacity should meet the design related criteria of this and other policies.*
- i) The loss of publically accessible playing pitch capacity to other type's development will only be permitted if that capacity is replaced elsewhere within the city or its immediate environs. Any reduction in non-publically accessible capacity is a matter for the University as it weighs this resource against its overall institutional and campus priorities.*
- j) In all circumstances lighting shall be designed to minimise the amount of night time illumination on the campus and light spill from the campus to moderate the impact of development on the AONB, the significance of the World Heritage Site and protected species of bats.*

Area Specific Development Principles

- k) Buildings sited between the Chemistry Building, Quarry Road and the West Car Park, or*

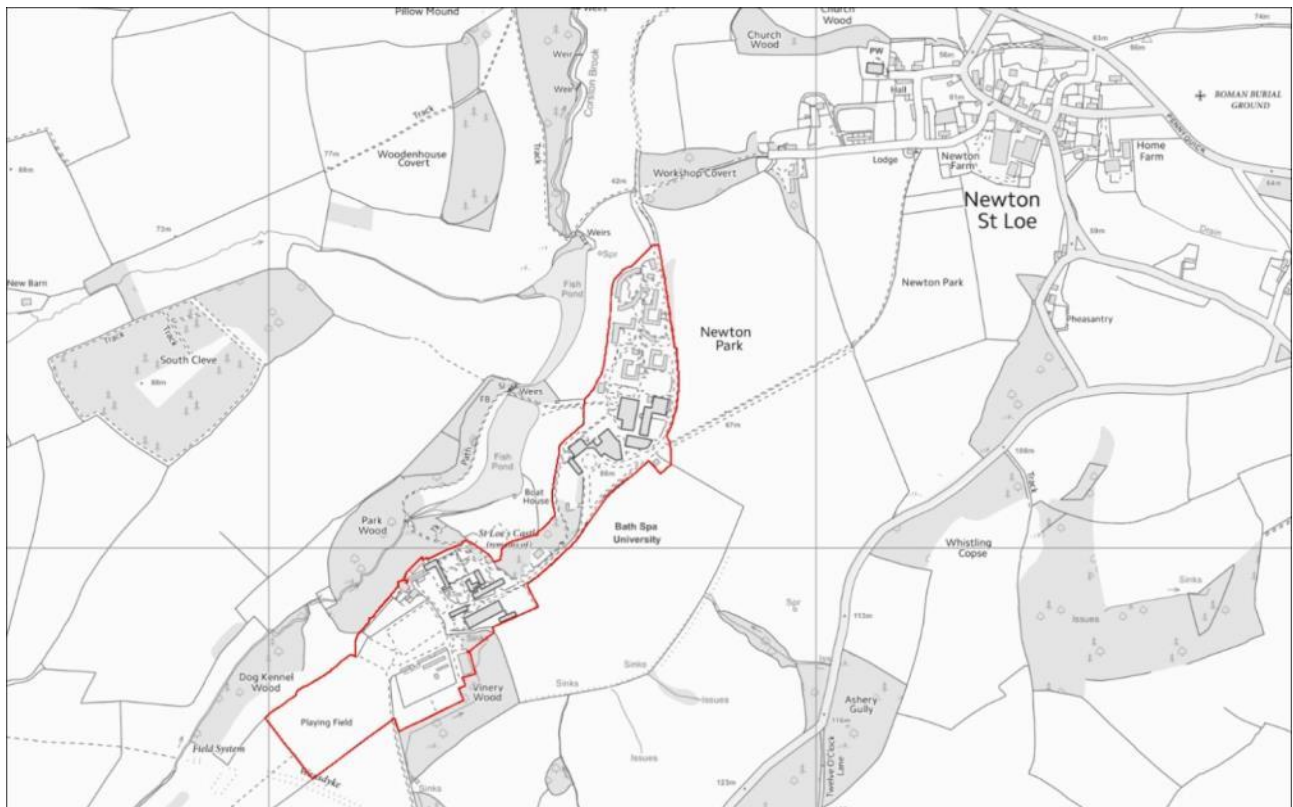
on it, shall be sited and designed to address this area's elevated location on the edge of the escarpment. Further, the design response should not adversely affect the residential amenity of properties to the south on North Road and should positively address the proximity of the Bath skyline walk, by retaining an attractive visual edge to the campus. This is currently an extensive, tranquil, green and pleasant corner of the campus and thus special regard should be had to general principle (e) and the maintenance of GI links between it, the central landscaped area and Sham Castle Field.

- l) Whilst the green bank opposite the Sports Institute is not unattractive, it contributes to a weak and confined sense of arrival. The Development Framework shows that the northern part of this bank, leading into the eastern end of the core structure the bus terminus and the east car park has development potential. The potential of this whole area should be maximised and an improved image and sense of arrival departure created around the optimum location of the bus terminus. In association, to the south of this area (beyond the purple zone) the southern part of the green bank opposite the Sports Institute should be opened up to create views to the University buildings across the central landscaped area to the main structure beyond.*
- m) Between the Chancellors Building and the areas of student accommodation is an undeveloped area that provides visual relief. This is not a hole in the purple zone but the placement of any structures within in will need to have special regard to general development principle (a) and the need for the campus to provide areas for informal recreation and visual relief from high density development.*
- n) Development on the southern car park should not adversely affect the residential amenity of properties to the south and special design regard should be had to the changing appearance that development in this area could cause to views from The Parade and from outside the campus.*
- o) The Tennis Courts on Norwood Avenue, if redeveloped, are only suitable for development of a height and use that respects and is compatible with the amenity of residential properties on Beech Avenue. That amenity does not include the maintenance of residents' views from Beech Avenue over the AONB as this is not a material planning consideration. The Norward Avenue approach should remained tree lined.*
- p) Further to the provisions for policy area (2) the design of development on the eastern playing fields should be landscape-led given its largely undeveloped nature and location within and potential to affect the qualities of wider AONB. Special attention should be paid to addressing general criteria (d) and (f), and boundary treatments, paying partially regard to the impact of development on protected species of bats and views from the wider Cotswold AONB.*

Other Matters to be addressed

- q) Proposals for further first year student accommodation should set out how the University expects the consequent follow-on accommodation needs so generated will be met and how this is compatible with the overall sustainable development of the city.*

Bath Spa University at Newton Park



Context

243. The occupation of the Newton Park campus for educational purposes began in 1949, when The Manor House became home to the Bath Teacher Training College. This subsequently merged with the Bath College of Domestic Science in the 1970s to form Bath College of Education. Subsequently, in the early 1980s the Bath Academy of Art also became part of Bath College of Higher Education. In 1992 the College was granted degree-awarding powers and in 1997 it became Bath Spa University College and in 2005 Bath Spa University when it was granted full university status. The University leases its campus land from the Duchy of Cornwall, which itself purchased Newton Park Estate in 1949. That the University does not own its campus land places an additional complexity in relation its future development. The landowner, legitimately, has a view on the extent to which new development should be countenanced.

Environmental and Policy Context

244. Bath Spa's Newton Park Campus sits within the core a registered (Grade II*) historic parkland 'of outstanding interest' and includes a Scheduled Monument (St Loe's Castle). There are three Grade I listed buildings (The Mainor House, Castle, and Castle Gatehouse); one Grade II* listing building (the Stables); and one Grade II listed building (the Dairy). The walls to the Italian Garden are also listed (Grade II*). The wider parkland beyond the campus also contains part of the Wansdyke Scheduled Monument and other listed buildings. Ecologically the campus hosts a number of lesser horseshoe bat roosts, which forage in the surrounding parkland. Both campus and the parkland within which it sits are within the Green Belt.

Bath Spa Development Framework

245. In addition to its environmental sensitivity and Green Belt status the other key aspect forming context for recent and future change on the campus are Bath Spa University's (now partly implemented) development aspirations for the estate.
246. In 2010 Bath Spa University prepared a Strategic Framework to identify its academic and accommodation deficiencies and requirements and aspirations for the future. This also set out the development potential and proposals for each of the sites that it occupies. This led to the production of a Development Framework and subsequent Campus Masterplan for the period 2010-2030, which set out three phases of development.

Phase 1 relates to **The Commons Building**, which involved the redevelopment of 2,300 sq.m. of administrative space and student accommodation (82 bedrooms) within in the northern part of the campus to achieve 8,500 sq.m. of academic space (net increase of around 6,200 sq.m.). This was permitted in August 2011 and completed opened in June 2014.

Phase 2 – relates to **561 student bedrooms** to the south of the campus (opened September 2014) and the associated removal, replacement or disposal of unsympathetic buildings and facilities to enhance the significance of heritage assets (ref: 12/02141/FUL).

Phase 3 – the **replacement of residential accommodation** (at the north of the campus), and is an intended future phase.

247. Although this programme was initially set out against an anticipated consolidation of student numbers to at least 2020/21, Bath Spa has more recently embarked on a programme to attract up to 1,500 international students (via its Shorelight programme) and since the lifting on the cap on student recruitment it has announced that it also aspires to increase other sources of students by a further 3,000 by 2020/21.
248. Due the constrained nature of the Newton Park campus it is unlikely that this will play a role beyond the 3 phases of development identified above. Even if there were exceptional or very special circumstances for developing in the Green Belt, the landowner would still have to be agreeable to development beyond the current footprint, which currently seems unlikely in respect of its view on what is acceptable in respect of protecting the heritage significance of the historic parkland. If the University is to achieve its aspirations then 10,000 sq.m. of additional teaching space will be required and there will be pressure on HMOs for follow on accommodation needs (the University having already secured much of the supply its requires to increase the intake of first years e.g. at Twerton Mill and Green Park House) . At this time no solution has been confirmed via the planning system in relation to the search for more teaching space with sites of interest to the University already earmarked for other uses to enable the delivery of housing, office space and the retention of industrial floorspace.

Policy approach

249. The majority of the previously developed part of the campus was previously defined as a MEDS (Major Existing Developed Site in the Green Belt) in the B&NES Local plan (2007).

The NPPF does not retain this terminology, but paragraph 89 retains the concept of the acceptability of developing on previously developed land in the Green Belt. The general extent of the campus is identified on the proposals map plan (an inset of which is reproduced below) but this is not all previously developed land. The determination of whether a specific area within the campus is previously developed will be made at development management stage and this issue should be raised at pre-application stage.

POLICY SB1- Bath Spa University, Newton Park Campus

- 1) Proposals for the redevelopment of previously developed land at the Newton Park Campus will be determined against of paragraph 89 of the NPPF. This enables***
 - the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;***
 - the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;***
 - 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.***
- 2) Development on undeveloped land in the Green Belt will require very special circumstances to be demonstrated. These should be presented with the context of a strategic framework for the University's entire estate and should show that there is no reasonable and deliverable alternative outside the Green Belt, as well as assessing the degree of harm that would be caused to the Green Belt.***
- 3) In all circumstances development proposals should have regard to the Development Plans policies on conserving and enhancing the historic environment. Where the use of Green Belt land would enable a rearrangement of uses within the estate (including via demolition) that would better reveal the significance of its heritage assets, this may form part of a very special circumstances case.***
- 4) Development on the campus should pay due regard to the presence bat (including lesser horseshoe bats) for which there are roosts within the campus, and great crested newts.***

Development on the edge of Bath

250. In order to meet the need for additional housing within the District during the Plan period development needs to take place at two locations on the edge of Bath: on land adjoining Odd Down and MoD, Ensleigh, Lansdown. At Odd Down, land is removed from the Green Belt. Policy B3A allocates land here for residential led development and a revised detailed Green Belt boundary is defined. Policy B3A also outlines the place-making principles to be met in delivering the development. The place-making principles are illustrated on a concept diagram for the site.
251. National planning policy makes it clear that when altering Green Belt boundaries a long term view needs to be taken to ensure that boundaries endure beyond the plan period. Where necessary this can include plans identifying areas of safeguarded land to meet longer term development needs. At Odd Down environmental sensitivity and the need to minimise harm means that there is no scope to identify safeguarded land for the longer term.

Land adjoining Odd Down, Bath Strategic Site Allocation

Policy B3a: Land adjoining Odd Down, Bath Strategic Site Allocation

Land is removed from the Green Belt as shown on the Key Diagram and Policies Map and allocated for residential development and associated infrastructure during the Plan period. The requirements that need to be met to enable development are set out in the Placemaking Principles, Core Policies and indicated on the Concept Diagram. The Placemaking Principles, being site specific, take priority over the Core Policies.

Placemaking Principles:

- 1 Residential led mixed use development (to include 40% affordable housing) of around 300 dwellings, in the plan period. The site should be developed at an average density of 35-40dph. The figure of 300 dwellings is not a cap on development if all the placemaking principles can be met***
- 2 Preparation of a comprehensive Masterplan, through public consultation, and to be agreed by the Council, reflecting best practice as embodied in 'By Design' (or successor guidance), ensuring that it is well integrated with neighbouring areas.***
- 3 Provision of Green infrastructure including multifunctional green space (formal, natural and allotments); well integrated Sustainable Urban Drainage Systems and habitat, pedestrian and cycle connectivity within the site and to the surrounding area.***
- 4 Include new Public Rights of Way and provide enhanced public access within the site and connecting well to the surrounding area.***
- 5 A Landscape and Ecological Mitigation Strategy and Management Plan is required, as part of the Masterplan, to ensure satisfactory mitigation and protection to include:***

Ecological Requirements

- **Protection of dark skies to the south and east of the location including zones of no artificial light adjacent to the protected tree belt and other ecological features retained or created within the site and in adjacent grazing lands. Light spill should be limited to no more than 1 lux (equivalent to a moonlit night)**
- **Retention and cultivation of planting features and off-site habitat including the retention of hedgerows and tree belts, as indicated on the Concept Diagram**
- **Safeguard skylark interest, through adequate mitigation or off-site compensation**
- **New woodland planting along the southern boundary of the plateau, particularly to the east of Sulis Manor (i) within the site and (ii) off-site within the plateau in order to strengthen bat foraging and flight links with Horsecombe Vale**
- **A recreational strategy to minimise harm to adjacent grazing regimes and habitats**
- **Particular attention is to be given to ensure satisfactory mitigation and or compensation as appropriate of protected species and their habitat (including Priority Species).**
- **Particular attention is to be given to ensure satisfactory mitigation and or compensation as appropriate of protected species and their habitat (including Priority Species).**

Landscape Requirements

- **Retention and protection of existing trees and significant hedgerows by inclusion within public open space and enhance hedgerows by provision of additional planting**
- **Protect the tree belt on the southern edge of the site and enhance with additional planting to ensure visual screening of the site from views to the south**
- **Avoid or minimise detrimental impacts on (and provide enhancements to important landscape features and significant views):**
 - **the Cotswolds AONB**
 - **South Stoke Conservation area and its setting**
 - **The character of the Cam Brook valley and Sulis Manor Plateau**
 - **The character of South Stoke and Combe Hay Lanes**
 - **Midford Road and the Cross Keys junction including maintaining open rural views over the plateau**
 - **The Wansdyke Scheduled Monument**
 - **Medium and long distance views such as Upper Twinhoe and Baggridge Hill.**

6 Seek to conserve the significance of heritage assets. As part of the Masterplan the following should be addressed:

World Heritage Site

- **The Southern boundary of the site should remain undeveloped to limit the visibility of development in wider views. An acceptable southerly extent of development and appropriate building heights will need to be established as part of the Masterplan.**
- **The Easterly extent of development and appropriate Eastern boundary treatment should be established as part of the Masterplan.**
- **Control light pollution to protect the visual screening of the site from views to the south.**

Wansdyke Scheduled Monument

- **Within the allocation, avoid built development in the field immediately to the south**

of the Wansdyke. To mitigate impacts, tree planting should be retained as indicated on the Concept Diagram.

- *A Management Plan setting out a strategy for the long-term and effective management of the monument including detailed measures for its positive enhancement will be developed in consultation with English Heritage and form part of any development proposals. This should include a recreational and movement solution which serves the new community and minimises harm to the Scheduled Monument.*
- *Limit development height and density in more prominent areas, such as higher ground and development edges.*
- *Limit lighting column heights to that of the development to minimise vertical features within the view from the Wansdyke.*

South Stoke Conservation Area

- *Limit the height and/or density of development closest to South Stoke Conservation Area to avoid harm to its setting.*
- *Provide a sensitively designed and improved pedestrian/cycle link, following the desire line to Cranmore Place/Frome Road to allow access to Threeways School and the Supermarket.*

Sulis Manor

- *Incorporate Sulis Manor and garden into development sensitively, retaining the framework of trees, and considering the conversion/retention of the Manor House and/or a low density development*

7 In relation to transport, the following apply:

- *Provide vehicular access, and junction enhancement, to facilitate access to the site from Combe Hay Lane.*
- *Provide an additional access for emergency vehicles.*
- *Provide pedestrian and cycle links with Sulis Meadows Estate and Sulis Manor; limited vehicular access from the estate is acceptable (subject to detailed design and location) but is not a requirement.*
- *Links to the National Cycle Route 24 and Two Tunnels should be facilitated.*
- *Provide a sensitively designed and improved pedestrian/cycle link, following the desire line to Cranmore Place/Frome Road to allow access to Threeways School and the Supermarket.*
- *Provide a safe and attractive pedestrian/ cycle link to the Odd Down Park and Ride from the site.*
- *Ensure sufficient car parking in the vicinity of St Gregory's School to meet the school's needs*

8 Contributions will be required to facilitate the expansion of St Martin's Garden Primary School.

9 The provision of additional local employment will be supported at Manor Farm, through conversion and redevelopment.

10 Retain and/or enhance the Odd Down Football Club (Football Pitches, Clubhouse and

changing facilities, play area, local market and car park) either:
(i) in its current location; or
(ii) by re-providing the Football Club with
an equivalent facility within the area

11 Localised areas of land instability must be either avoided or addressed with appropriate remediation.

Insert CONCEPT DIAGRAM FOR LAND AT ODD DOWN STRATEGIC SITE ALLOCATION

Infrastructure and Delivery

Infrastructure

152. The delivery of the Bath spatial strategy will need to be supported by the provision of necessary infrastructure. The key infrastructure requirements as identified in the B&NES Infrastructure Delivery Programme (IDP) are summarised in table 5. These are supplemented by infrastructure requirements included in the District wide sections. The IDP also includes a number of desirable infrastructure items (see paragraph 2.49) Infrastructure planning involves an ongoing process of dialogue and communication with infrastructure providers and as further evidence is developed and future funding is secured additional items may be added to the IDP or their status may be upgraded or altered.
153. In order to successfully realise the development potential of the Central Area and the Enterprise Area, parallel enabling investment will be needed. Transportation and flooding and land remediation are three key areas requiring specific mention.

Transportation

154. The Council's Transport Strategy for Bath is one of reducing the use of cars for travelling to and within the city, by progressing improvements to public transport and making walking or cycling within the city the preferred option for short trips. This will be achieved through a variety of measures including:

- Bath Transport Package - comprising a range of measures including three extended Park & Ride sites; upgrading nine bus routes to showcase standard including upgrades to bus stop infrastructure and variable message signs on key routes into the city displaying information about car parking availability
- Improvements to the bus network through the Greater Bristol Bus Network major scheme including key routes from Bristol and Midsomer Norton,
- Rail improvements, such as the electrification of Great Western Railway mainline by 2016; the new 15 year GWR franchise (including the Greater Bristol Metro Project); and increasing the capacity of local rail services travelling through Bath Spa rail station, improving ease of access to and attractiveness of rail travel to and from Bath

- The West of England authorities (including B&NES) have been awarded Local Sustainable Transport Fund key component funding for a number of measures and also been invited by the Department for Transport to submit a major bid to the Local Sustainable Transport Fund for £25.5 million.
- Creating a more pedestrian and cyclist-friendly city centre through the introduction of access changes on a number of streets and expansion and enhancement of pedestrian areas.
- Other improvements to walking and cycling infrastructure through the Councils Integrated Transport annual settlement and the implementation of 'Smarter Choices' for transport e.g. Proposed Change Reason for change through the development of travel plans for new and existing sites and the expansion of car clubs.
- Seeking to reduce nitrogen dioxide levels in Bath by, for example, reducing the level of heavy goods vehicle (HGV) traffic in the city through:

- i the continued support & promotion of the Council's Freight Consolidation Centre for deliveries to central Bath; and
- ii by implementing traffic management measures.

- Creation of one or more Park & Ride sites on the eastern side of the city to reduce commuter traffic.
- The disused rail line between Brassmill Lane and Windsor Bridge, Bath is safeguarded as a Sustainable Transport route for non-motorised forms of transport (with the exception of mobility scooters). It will provide a high quality and safe cycling and pedestrian route through to Western Riverside that extends the Bristol to Bath Railway path, the Two Tunnels Greenway, and provides a wider choice of sustainable transport routes for local communities to efficiently connect to the city centre and to Bath's Enterprise Area.
- The provision of this route will be complementary to the current riverside path. It will help to reduce pressure and potential conflict between cyclists and pedestrians, and enable the riverside to be properly enhanced as an environmental asset and an important part of the city's green infrastructure network. This will help to redefine the image and identity of the Western Corridor as an economically prosperous area that complements the offer of the Central Area, is set within a high quality natural environment, and is accessed by a comprehensive sustainable cycling and pedestrian network.

155. To complement these public transport and cycling/walking improvements the Council will update its Parking Strategy for Bath which will broadly maintain central area car parking at existing levels in the short term and continue to prioritise management of that parking for short and medium stay users. This is necessary in order to discourage car use for commuting and provide sufficient parking to help maintain the vitality and viability of the city centre as a shopping and visitor destination. It will also result in a relative reduction in the amount of central area parking that is available as the economy grows, jobs are created and demand increases.

156. The proposals set out above will help to enable the programme of development set out in the spatial strategy to be delivered in a way that minimises travel related environmental and air quality harm whilst providing convenient and sustainable access within the city.

Flood Risk Management for the Central Area and the Enterprise Area.

157. A number of potential development locations fall within Flood Zone 3a and 2. A Flood Risk Management Strategy has concluded that there is no comprehensive strategic solution for reducing peak flow through Bath which is both technically and economically viable. Measures assessed included the raising of defences along the river channel and deepening of the river channel.

158. Following the Flood Risk Management Strategy, the Hydraulic Modelling (Bath Flood Risk Management Project Feb 2013 by Black & Veatch) was prepared. The impact of raising the key development sites in the Central Area and the Enterprise Area in Bath is a loss of conveyance, rather than a loss of flood storage. It recommends, where necessary, to raise all the development sites and the access/egress routes (or raise defence walls) and implement conveyance mitigation measures.

Land Remediation in the Central Area and Western Corridor

159. Addressing land remediation within the Central Area and Western Corridor in relation to industrial and utilities uses, including the decommissioning and removal of the Windsor Gas Holder Station is an essential prerequisite to the redevelopment of Bath Western Riverside and its environs.

The desirable infrastructure items of importance to the city include:

- Green infrastructure: river corridor, formal and informal green spaces and allotments.
- Safer and improved routes for pedestrians and cyclists.
- Smarter Choices Measures, including measures such as:
 - Travel Plans - new development to be required to contribute to improvements identified by School Travel Plans
 - Community Transport
 - Encouraging car sharing e.g. via car clubs
 - Working from Home
- Re-provision of any sports pitches or other facilities where triggered by development.
- District heating infrastructure
- Delivery

160. The Council working in conjunction with West of England partners, the Homes & Communities Agency, and other agencies, has developed a Delivery & Infrastructure Investment Framework for the subregion covering the period 2010–2020. A Delivery & Infrastructure Investment Plan for 2010/11 has been agreed. This process has been known as the "Single Conversation".

161. The Central Area plus Western Riverside (referred to as Bath City Riverside) is identified as an important location for delivering the aspirations for the West of England. Investment

needs to be made into a number of key infrastructure schemes including flood alleviation, land assembly, remediation and affordable housing. In total £27.6m of public investment will be needed to ensure that these matters are addressed.

162. Delivery of the strategy and infrastructure required to support it will be facilitated by the planning framework summarised below:

- Planning Obligations SPD
- Placemaking Plan
- Community Infrastructure Levy

Insert:

Table 5: Summary of Key Infrastructure in Bath