Local Plan 2016-2036

Options Consultation

Winter 2018

Bath & North East Somerset Council

Contents

1. Introduction

1.1 Background

1.1.1 The B&NES Local Plan will set out a strategy to guide future development, site allocations and district-wide Development Management policies. Along with the West of England Joint Spatial Plan, it will be the primary basis for determining planning applications. It will cover the period from 2016 to 2036. Upon its adoption it will replace the Core Strategy and Placemaking Plan.

1.1.2 The Local Plan must deliver the West of England Joint Spatial Plan and respond to changed local circumstances and new national policy/legislation.

1.1.3 **The West of England Joint Spatial Plan** also covers the period from 2016 to 2036 and focuses on establishing the housing requirement for the area and the job growth to be planned for, as well as a broad spatial strategy for accommodating growth. Alongside the Joint Spatial Plan the four West of England authorities have prepared a Joint Transport Study to identify key transport infrastructure measures required to support the growth.

1.1.4 Preparation of the B&NES Local Plan will be supported by a range of evidence and the Council is working with communities and other stakeholders in preparing the Plan. Public consultation takes place at each stage of preparation and the issues raised are considered and used to inform the Local Plan as it progresses. The Council's response to the key issues raised at each stage is outlined in a separate consultation statement which will be published alongside the Draft Plan.

1.2 Timetable

1.2.1 Preparation of the Local Plan encompasses a series of stages, accompanied by public consultation. The Council published a commencement document in November 2016 outlining the intended scope of the Local Plan. In winter 2017/18 the Council consulted on an Issues & Options document.

1.2.2 The Issues & Options document started the conversation with communities and stakeholders on the issues set out below:

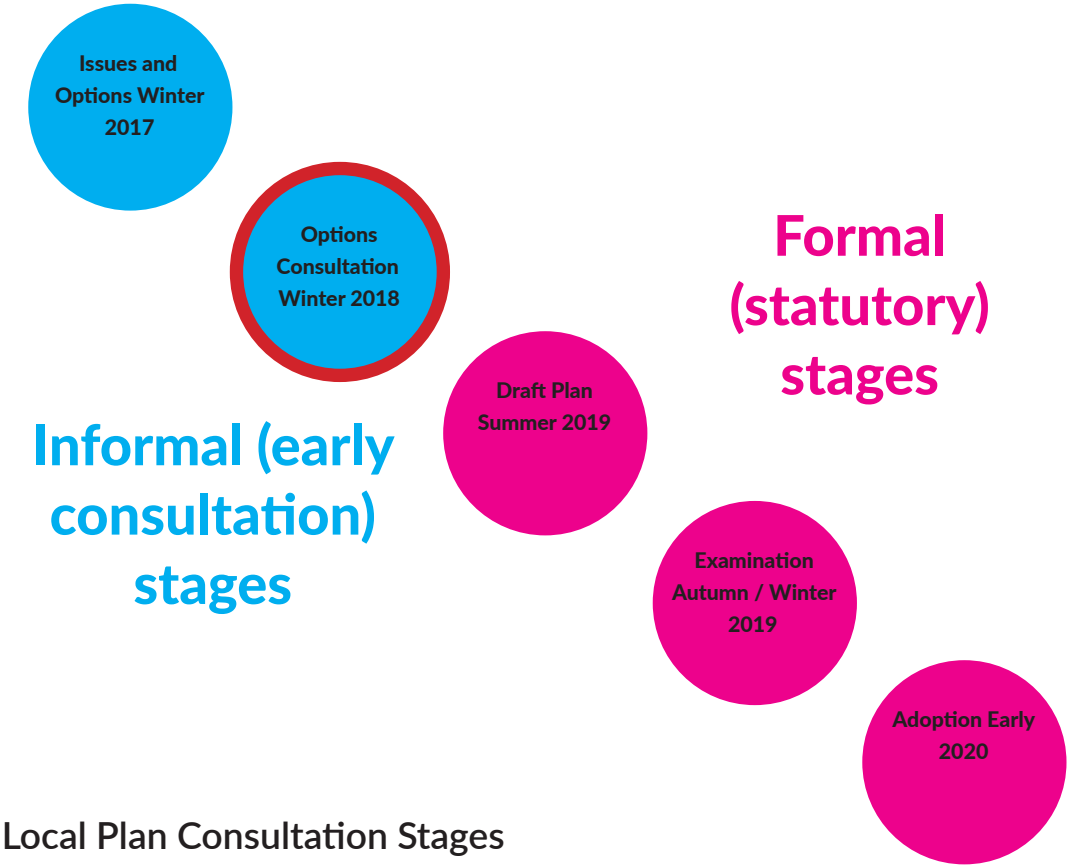
1. Vision & Priorities for the Local Plan
2. Spatial Strategy – high level options for distribution of housing
3. Strategic Development Locations at North Keynsham & Whitchurch
4. Student accommodation – approach options

1.2.3 Since the preparation of the Issues & Options document the proposed subsequent preparation stages have changed.

1.2.4 Following consideration of feedback on this Options document and further evidence base work, the Council will prepare and publish a Draft Plan for consultation. The Draft Plan will set out proposed site allocations and policies. Given the close links with the Joint Spatial Plan the Draft Plan will not be published for consultation until the four authorities have heard from

the Planning Inspectors that are examining and testing the Joint Spatial Plan.

1.2.5 Once the Draft Local Plan has been consulted upon the Local Plan will be submitted for Examination before a Planning Inspector and adoption by the Council. The currently envisaged timetable for this process is set out in the diagram below. However, this may be subject to change dependent on the progress of the Joint Spatial Plan Examination.



Local Plan Consultation Stages

1.3 Purpose and Scope of the Options document

1.3.1 The Local Plan will allocate sites for development and set out a comprehensive policy framework for determining planning applications across the District. This Options document focuses on the issues which need review or significant change within the new Local Plan. Existing policy areas where limited or no change is needed are referenced briefly in this document. The Options document will outline the emerging proposed policy approaches and options, rather than policy wording, to address these issues. Its publication will stimulate further discussion and comment which will be used to inform the Council's policies and site allocations proposed in the Draft Local Plan.

1.3.2 The document is divided into the following chapters:

- Vision and Spatial Priorities
- Spatial Strategy, including non-strategic housing growth
- Bath
- Keynsham, including

North Keynsham Strategic Development Location
- Whitchurch Strategic Development Location
- Somer Valley
- Development Management Policies

1.3.3 Alongside the Local Plan the Council is progressing a number of other closely related projects which are summarised below. Consultation will take place on these projects in parallel with this Local Plan options consultation.

1.3.4 The four Unitary Authorities are consulting on additional information related to the Joint Spatial Plan Examination. B&NES Council will also be consulting on options for transport routes associated with the Strategic Development Locations; transport improvements related to the Somer Valley Enterprise Zone; and improvements to Keynsham High Street. These projects and their linkages with the Local Plan are more fully explained in the relevant chapter of this document

1.3.5 This Options document is supported by Topic Papers explaining the emerging approach for the key areas it is addressing. A number of evidence studies supporting the document have also been published, including a Housing & Economic Land Availability Assessment (HELAA). This information is available on the Council's website at: www.bathnes.gov.uk/localplan

1.3.6 All Local Plans are subject to an examination in public to ensure that they are 'Sound'. The Draft B&NES Local Plan will be prepared taking account of this consultation and is due to be published in mid-2019. An Inspector examining the Local Plan will ensure that the plan is:

- Positively prepared – it should meet the District's needs for development;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective – deliverable over the plan period; and
- Consistent with national policy

1.4 How to get involved

1.4.1 The purpose of this Options consultation is to facilitate discussion and generate comment on the options or potential approaches for addressing some of the critical issues facing Bath and North East Somerset and we would like you to be involved in this process.

1.4.2 The proposed policy approaches and options set out in Chapter 3 - 8 each have a **unique reference number** which should be used when making comments.

1.4.3 The Local Plan Options document and other background information can be found on the Council's website www.bathnes.gov.uk/localplan

1.4.4 Hard copies of the document can be viewed at the following locations during opening hours: Council Offices:

- The One Stop Shop, Manvers Street, Bath
- Civic Centre One Stop Shop, Temple Street, Keynsham

- The Hollies, Midsomer Norton
- All public and community libraries in the District.

1.5 Drop-in events

1.5.1 We will also be holding a number of staffed exhibitions throughout the District (details below), which members of the public are welcome to attend and discuss issues with officers.

Whitchurch

- Monday 19th November
- Large Hall in Whitchurch Community Centre
- 3.30 pm - 7.30 pm

Bath

- Tuesday 20th November
- Guildhall, Brunswick Room
- 3.30 pm - 7.30 pm

Keynsham

- Thursday 22nd November
- Civic Centre Community Space
- 3.30 pm - 7.30 pm

Paulton

- Friday 23rd November
- Village Hall
- 3.30 pm - 7.30 pm

Midsomer Norton

- Friday 30th November
- Assembly Room, Midsomer Norton Town Hall
- 3.30 pm - 7.30 pm

1.6 Your comments

1.6.1 Please submit comments online through the consultation portal www.bathnes.gov.uk/localplan

Alternatively:

- local_plan@bathnes.gov.uk

- Local Plan Consultation, Bath & North East Somerset Council, Manvers Street, Bath, BA11JG

1.6.2 **Comments on the Local Plan Options document must be received by Monday 7th January 2019.**

2. Vision and Spatial Priorities

2.1 Setting the scene

2.1.1 National policy makes it clear that Local Plans have a key role in helping to deliver sustainable development. In order to ensure that it is clear what the Local Plan is seeking to achieve a set of spatial priorities is identified that address the main challenges affecting the area. The Plan's spatial strategy, site allocations and policies must work towards achieving these priorities.

2.1.2 The adopted Core Strategy sets out a vision for B&NES and a set of strategic objectives for both the Core Strategy and Placemaking Plan. These currently cover the period up to 2029. Through the Local Plan it is proposed that this vision and objectives is reviewed and re-focused in light of changed circumstances, including changes in national context; the key challenges now facing B&NES; the objectives set by the West of England Joint Spatial Plan (JSP); and the Council's principles and priorities.

2.1.3 Within this context and the challenges facing B&NES, the Council outlined a proposed vision and set of spatial priorities for the Local Plan in the Winter 2017 Issues & Options consultation document. Responses received to the consultation have been considered in setting out the Vision and Spatial Priorities below.

2.2 Vision

2.2.1 Within the framework of the JSP, which focusses on the area being a fast growing and prosperous city region with a rising quality of life for all, it was proposed in the Winter 2017 consultation document that the Council's Corporate 2020 vision is taken as the Local Plan vision for B&NES. Feedback from the consultation did not raise any significant concerns in relation to using this vision for the Local Plan.

2.3 Spatial Priorities

2.3.1 As the Local Plan is able to influence and help shape spatial outcomes (those that result in or require the use of or changes to places, land and buildings) a set of spatial priorities needs to be identified. The spatial priorities should be read within the context of the Council's overall values, purpose and corporate strategy priorities.

2.3.2 In the Winter 2017 consultation the Council identified seven overarching priorities, each with a set of more detailed sub-priorities. The response to the public consultation did not raise fundamental concerns in relation to the overarching seven priorities, comments focused on the sub-priorities and ensuring delivery.

B&NES Vision

Bath and North East Somerset will be internationally renowned as a beautifully inventive and entrepreneurial 21st century place with a strong social purpose and a spirit of wellbeing, where everyone is invited to think big – a 'connected' area ready to create an extraordinary legacy for future generations

2.3.3 In addition the sustainability appraisal at the Issues & Options stage did not suggest that the overarching priorities needed to be changed. Therefore, it is proposed that the seven overarching spatial priorities previously consulted upon are retained and these are set out below.

2.3.4 There are inter-relationships between the identified spatial priorities, for example prioritising greater walking or cycling helps to address climate change issues, as well as increasing physical activity thereby addressing health priorities.

2.5 Council's Values and Priorities

2.5.1 Local government is increasingly facing an environment of constrained resources. In order to prioritise the use of its resources the Council has adopted the key priorities listed below, which will underpin its corporate planning.

1. Protect and care for our most vulnerable
2. Nurture residents' health, safety and wellbeing
3. Provide ways for everyone in the community to reach their full potential

2.5.2 The Local Plan's spatial priorities should be viewed within the context of the Council's values and key priorities. The relationship between the spatial priorities and the Council's key priorities (as referenced in the table below) demonstrates how the Local Plan and the planning system will help to deliver the Council's broader aspirations.

Spatial Priority for the Local Plan	Council's Priorities
Cross cutting objective: Pursue a low carbon and sustainable future in a changing climate	2
Protect and enhance the District's natural, built and cultural environment and provide green infrastructure	2
Facilitate a strong, productive, diverse and inclusive	3
Meet housing needs arising from a changing and growing population	1, 2, 3
Plan for development that promotes health and well being	2
Deliver well connected places accessible by sustainable means of transport	2, 3
Ensure the timely and efficient provision of infrastructure to support growing communities	1, 2, 3

2.5.3 The Local Plan's policy framework, including development site allocations, will be aimed at achieving the identified spatial priorities. Where locational or policy approach options are identified in this document they will need to be tested against the extent to which they achieve the spatial priorities. In some instances balancing spatial priorities may be necessary.








3. Spatial Strategy including the rural areas

3.1 Setting the scene

3.1.1 The Joint Spatial Plan (JSP) establishes the amount of housing and economic growth that needs to be planned for up to 2036 and a spatial strategy for where it should be accommodated across the West of England. The B&NES Local Plan is being prepared within this context and to support delivery of the Joint Spatial Plan.

3.2 Housing

3.2.1 The targets for new housing and its broad distribution for the new Local Plan are largely set by the JSP (subject to independent examination). For B&NES, the JSP proposes a requirement to plan for 14,500 new dwellings by 2036. The components of housing supply are illustrated in the Diagram 1 and their distribution in Diagram 2 below.

3.2.2 As set out in Diagram 1 and assuming housing on existing committed sites is delivered, the Local Plan needs to plan for the delivery of around an additional 4,700 new homes. These homes will be provided at the Strategic Development Locations (SDLs) at Whitchurch and North Keynsham, through urban intensification in Bath and through what the JSP terms as 'non-strategic' growth across the rest of B&NES, principally in the Somer Valley and rural areas. The JSP housing distribution is broadly indicated in Diagram 2.

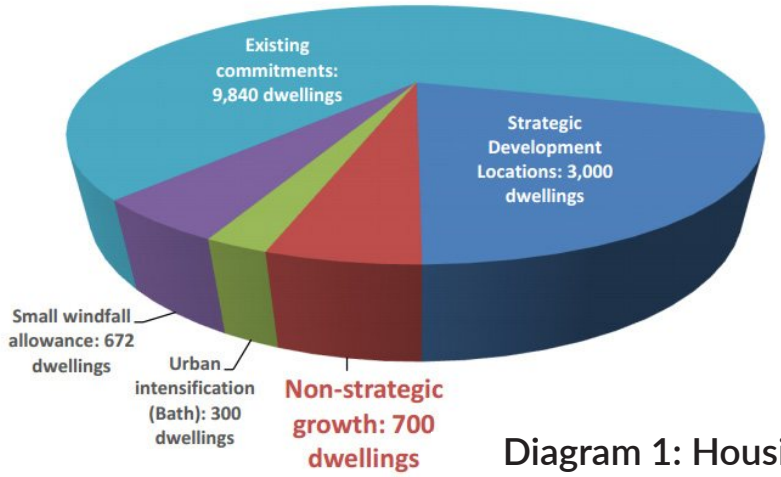


Diagram 1: Housing Supply

3.2.3 Consideration of housing provision in existing commitments, the SDLs and through urban intensification is set out in the relevant place based chapters. This Local Plan has a key role in establishing how the 'non-strategic' growth of 700 dwellings can be delivered and it is this element of the strategy that is dealt with in this chapter.

3.2.4 The JSP defines 'non-strategic growth' as sites of more than 10 homes and below 500 homes to be delivered through Local Plans. It should be noted that the 'non-strategic growth' dwelling figure has yet to be tested through the JSP independent examination and will not be confirmed until the JSP Inspector's Report, which is expected to be published during the latter part of 2019. As such it will be prudent, as the Local Plan preparation progresses,

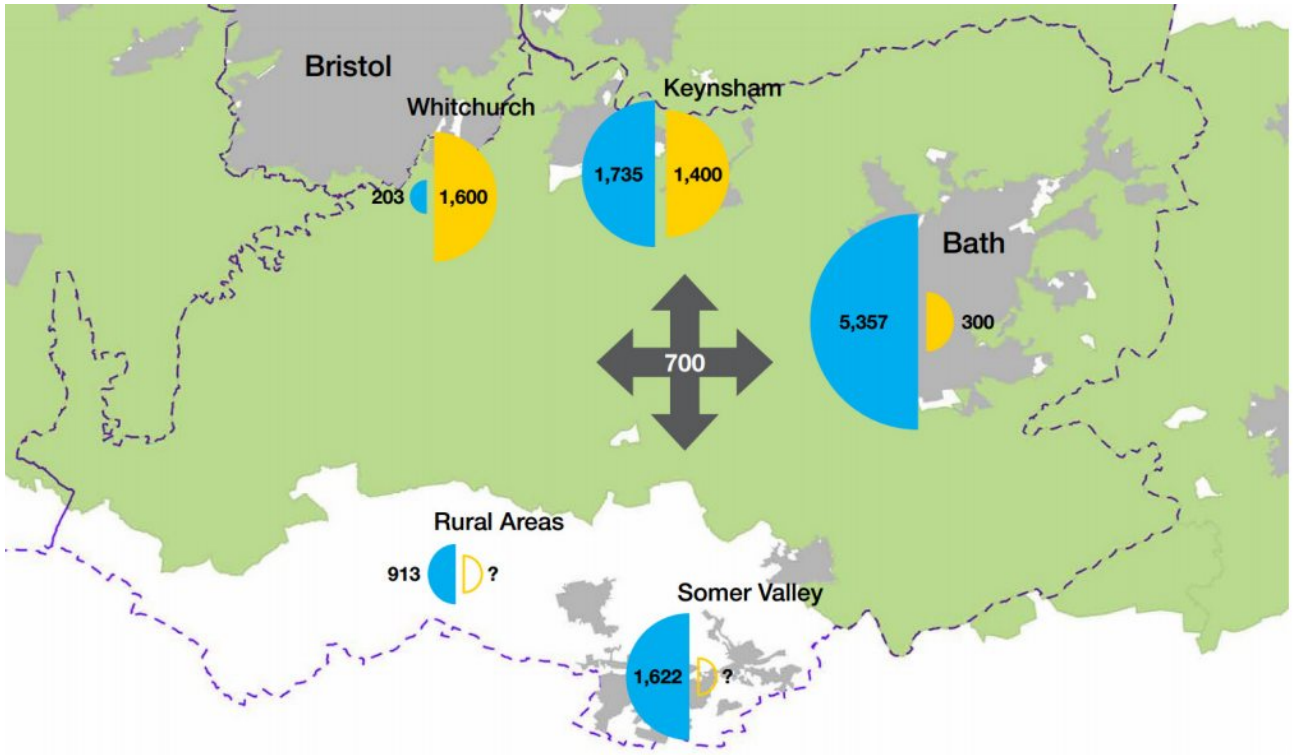


Diagram 2: Joint Spatial Plan housing distribution

to plan for a contingency, which could also address the possibility of potential under delivery on existing commitments. Therefore, the quantum of 700 homes and the distribution options set out in this chapter may be subject to change.

3.2.5 For reasons of ensuring a diversity of housing supply sources and facilitating delivery, the Revised National Planning Policy Framework (NPPF) also requires that 10% of the total housing requirement is delivered on small sites which are less than 1 hectare in area. This equates to 1,450 homes. Based on dwelling completions since 2016, permitted small sites and an allowance for a continuing contribution from small sites, it is anticipated that a total of around 2,650 dwellings will be provided on small sites (of less than 0.5 hectares in area or a capacity of less than 10 dwellings) between 2016 and 2036. This is more than sufficient to meet the NPPF requirement.

3.3 Job Growth

3.3.1 The Draft JSP requires that across the West of England provision is made for 82,500 additional jobs during the plan period (2016-2036). It identifies key locations where

this job growth should take place. In relation to B&NES the locations identified are the Bath City Enterprise Zone, the Somer Valley Enterprise Zone and the SDLs at North Keynsham and Whitchurch.

3.3.2 The Draft JSP does not specify a job provision requirement or target for B&NES. However, based on initial analysis of economic growth prospects and the economic ambitions of the Council, it is assumed that around 14% of additional jobs to be provided for across the West of England should be focused in B&NES. Having regard to the strategic housing requirement set by the JSP it is estimated that provision should be made for around 12,500 jobs (net additional) in B&NES.

3.3.3 Further work needs to be undertaken to support the Draft Local Plan, within the context of reviewing the B&NES Economic Strategy, to assess the key economic growth sectors in B&NES, and to review employment land supply (existing, permitted and allocated) to ascertain whether it is sufficient to facilitate this growth.

3.3.4 Initial work suggests in broad terms that sites currently permitted and land allocated in the Placemaking Plan may be sufficient to support this level of economic and job growth, assuming that losses of existing employment land are restrained.

3.3.5 More detailed consideration of housing and job growth is set out in the Place based chapters of this document.

3.4 Planning for new homes in the Somer Valley and Rural Areas

3.4.1 The Key Diagram from the Core Strategy reproduced below (Diagram 3) shows the **current spatial strategy**

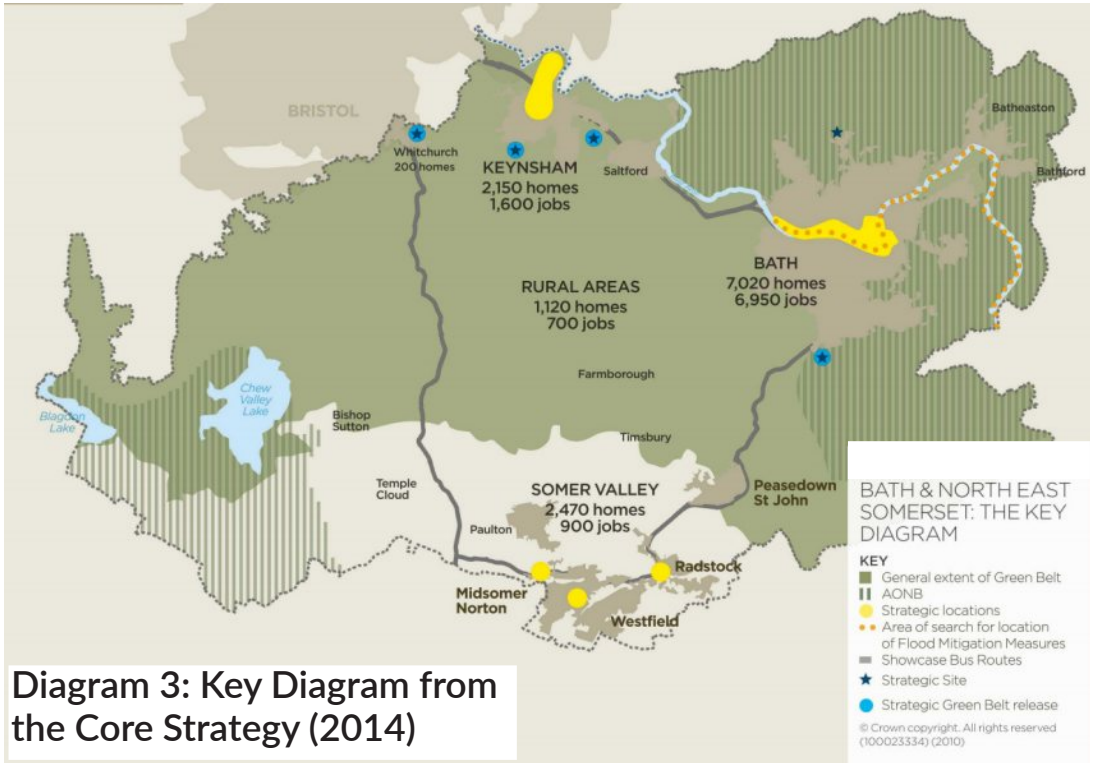


Diagram 3: Key Diagram from the Core Strategy (2014)

for Bath & North East Somerset for the period 2011 - 2029.

3.4.2 Outside Bath and Keynsham the current spatial strategy for the location of new development as established through the Core Strategy and Placemaking Plan is as follows:

- Policy SV1 – around 2,470 homes at Midsomer Norton, Radstock, Westfield, Paulton & Peasedown St John
- Policy RA1 villages - non-Green Belt villages i.e. those villages with a primary school and at least 2 of the following key facilities within the village: post office, community meeting place and convenience shop, and at least a daily Monday-Saturday public transport service to main centres (around 50 dwellings at each village)
- RA2 villages - non-Green Belt villages outside the scope of RA1 (10 -15 dwellings at each village)
- Policy GB2 - Green Belt villages (limited infill only)

3.5 Issues arising

3.5.1 It is becoming increasingly evident that the current strategy is leading to the relative dispersal of development across a wide range of settlements. This is an unintended consequence of the approach outlined above and has led to a number of issues this Local Plan needs to address, the most critical of which is primary school capacity.

3.5.2 One of the requirements of the current policy approach is that a village meeting the Policy RA1 criteria has a primary school with sufficient capacity or ability to expand. Some village schools do not have projected spare capacity to provide additional school places that would arise from future development proposals or scope for expansion within the current school site to provide the necessary places. Through the Local Plan the location of the new 700 homes required needs to re-consider whether further residential development should be encouraged at settlements where there is no reasonable prospect of access to a primary school place.

3.6 Development in the 'right places'

3.6.1 In establishing the distribution of 'non-strategic growth' national planning policy remains clear on the importance of location to sustainability and that a core role of planning is to ensure that development is steered towards the 'right places'. These are described as places which support growth, innovation and the efficient provision of infrastructure; are accessible to a range of local services; encourage the use of public transport, walking and cycling; and help tackle climate change. Local Planning Authorities are required to consider these sustainability criteria when allocating sites within a Local Plan.

3.6.2 As part of the Local Plan consultation last November, the Council started the discussion by suggesting three broad scenarios for accommodating non-strategic growth:

- Scenario 1 - Hierarchical Approach: continuation of the exist¬ing strategy

- Scenario 2 - Focused Approach: focusing new housing at a more limited range of settlements.
- Scenario 3 - Dispersed Approach: spreading the development across a wide range of settlements.

3.6.3 Most of those who responded to the consultation considered Scenarios 1 and 2 to be the most sustainable solutions for accommodating non-strategic growth. Scenario 3 was felt to be unsustainable, as it would increase the need to travel and put excessive pressure on infrastructure. However, some housing in order to assist in retaining the vitality of communities and their services/facilities at a range of villages was supported.

3.7 Locational Options

3.7.1 The Housing and Economic Land Availability Assessment (HELAA) provides the technical basis and starting point to ascertain the suitability of potential development sites. Based on the technical outputs of HELAA, the Council will continue to work closely with Parish and Town Councils on the selection of the most appropriate sites for allocation in the Local Plan within the context of the preferred spatial distribution.

3.7.2 In deriving the options below the following key factors were assessed:

Access to services and facilities

3.7.3 The Rural Facilities Audit provides an indication of the level and range of local services and facilities within or immediately adjacent to each settlement. This provides a broad indication of the level of key services and facilities at each settlement outside the main urban areas including access to local schools, employment opportunities, and public transport provision. It also shows that whilst some settlements are located on or near routes with a frequent public transport service, much of the District is inadequately served by public transport and largely car dependent for access to key services and facilities.

Primary school capacity

3.7.4 As outlined above primary school capacity is a key consideration and there is an obligation on the Council to provide school places for pupils. Given the scale of the issue and in order to avoid pressure on Council resources and unsustainable school travel patterns, the selection of locations for development is directed towards those settlements where there is potential school capacity and /or there is potential scope for the expansion, reconfiguration or redevelopment of a school.

Public transport provision and walking/cycling accessibility

3.7.5 An assessment of public transport provision and frequency serving settlements in the rural areas was undertaken using a range of benchmark indicators (very frequent, frequent, moderate, limited and very limited). This provided an overview of current public transport provision in and through the rural areas. The accessibility assessment was further refined with an analysis of the walking or cycling distance from the candidate

locations (see note on primary school capacity above) to the nearest primary school, bus stop and to other services and facilities. The impact of potential development locations on the highway network was also considered.

Impact on environmental assets

3.7.6 Building on the HELAA the impacts on key environmental assets have been reviewed and refined where necessary. This included landscape sensitivity, heritage assets, ecology, agricultural land and whether significant flood risk management issues had been identified.

3.7.7 The implications of the options for other issues such as Air Quality, including the newly declared Farrington Gurney and Temple Cloud Air Quality Management Areas on the A37, will need further assessment.

3.8 Emerging approach

3.8.1 From the above analysis the options presented below have been derived as the basis for consultation. National policy makes it clear that authorities should seek to accommodate development requirements without using land in the Green Belt. Land can only be removed from the Green Belt and allocated for development if 'exceptional circumstances' are demonstrated. The JSP establishes 'exceptional circumstances' for the strategic removal of land from the Green Belt at two specific locations with B&NES, at North Keynsham and Whitchurch (see chapters 5 and 6). These 'exceptional circumstances' do not apply to the remainder of the District. In terms of non-strategic growth 'exceptional circumstances' will only exist if the requirement cannot be met sustainably on land outside the Green Belt. This includes exploring the potential contribution of land in adjoining authorities through the Duty to Co-operate (see also paragraph 3.8.6).

3.8.2 Two options are suggested for how non-strategic growth could be accommodated on land outside the Green Belt. Also outlined is a third option which includes potential areas within the Green Belt if 'exceptional circumstances' are demonstrated. All options suggested will need to provide 700 dwellings plus allowing scope for contingency.

3.8.3 All options involve directing the non-strategic development to limited key locations at settlements where there is a primary school with capacity or scope for expansion or redevelopment. The locations indicated have been derived from a comparative sustainability led assessment and an analysis of land considered through the HELAA, with a focus on brownfield sites first in the most sustainable settlements outside the Green Belt. As some brownfield sites lie within locations where development is likely to be too harmful, available greenfield sites with least harmful impacts were also considered.

3.8.4 Whilst the locations identified under the options have the scope/ capacity to accommodate housing development, it is acknowledged there could be adverse impacts associated with housing development in some of the locations. The key impacts and issues are outlined after

each option.

3.8.5 Further work will be needed to determine the appropriate level of growth for each settlement and whether sites can realistically deliver the growth suggested for each broad location. The level of growth proposed will need to be supported by the necessary infrastructure and any shortfalls in respect of for instance, health facilities, will need to be addressed before sites are allocated in the Draft Local Plan.

3.8.6 The outcome of this consultation will help to inform the spatial strategy in the Draft Local Plan. The resultant distribution of new homes will provide the basis for defining a housing requirement for neighbourhood plan areas as required by the new NPPF. Specific sites will then be identified and allocated for housing development in the Draft Local Plan or can be allocated through Neighbourhood Plans. It should

SS1 Option 1. Focused approach avoiding the Green Belt

Under this option all non-strategic growth is focused at a few key locations outside the Green Belt in the south of the District. These could act as the focal points for future housing development.

The main benefit of this approach is that it could help to facilitate investment in infrastructure such as schools, health facilities, and open space. However the impact of these levels of growth on a settlement could be relatively significant as outlined below in para 3.9.1.

Midsomer Norton, Westfield and Radstock have a good range of services and facilities to meet the daily needs of residents and workers. Development with appropriate on-site facilities will improve accessibility for new as well as existing communities. Timsbury has a lower level of services and facilities and the public transport links are reasonable but the services are not as frequent as some settlements within B&NES. However, Timsbury does have a primary school, with capacity and/or the potential scope to be expanded or redeveloped. It is acknowledged that without appropriate improvement, cumulative impact of new housing and population growth will put additional strain on existing facilities and services and the road infrastructure.

The diagram below indicates the potential distribution of development under this scenario focusing on locations at Midsomer Norton, Radstock and Timsbury but also allowing a limited number of dwellings (50) to be accommodated in other non-Green Belt villages during the Plan period. These villages/locations will need to be specified in the draft Local Plan due to be published next year. This will be subject to further work, including with the Parish Councils, to derive the most appropriate approach and assess the suitability of potential sites through the HELAA.

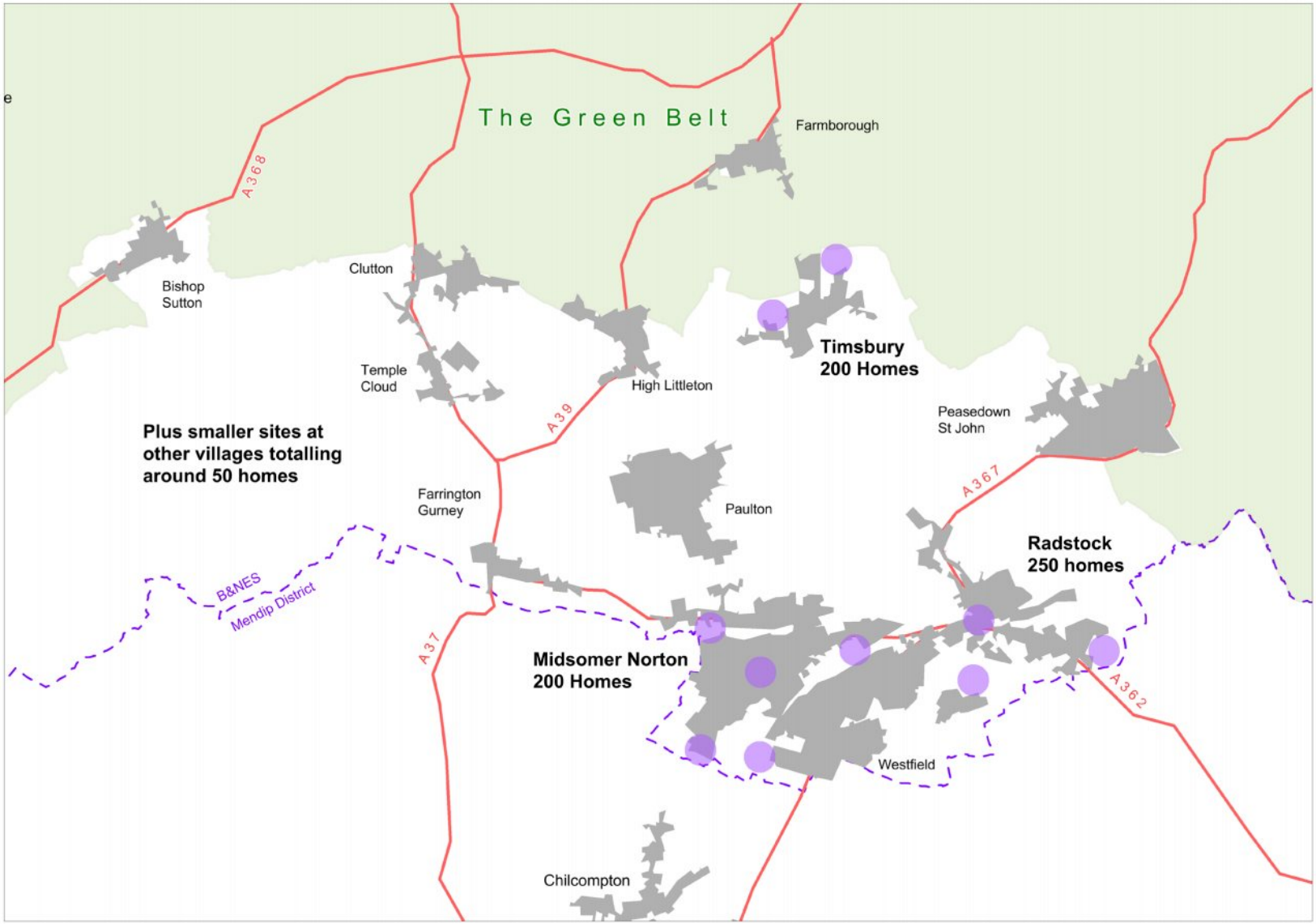


Diagram 4 - Option 1

These are not proposals and the figures are only indicative

be noted that the Council is also in discussion with Mendip District Council with regard to cross-border distribution of growth to the south of Midsomer Norton through the Duty to Co-operate.

3.8.7 The two non-Green Belt options for accommodating non-strategic growth as expressed below will have implications for the emerging strategy for the Somer Valley. This is discussed further in Chapter 7.

3.9 Key impacts and issues

3.9.1 By directing growth to these locations the following issues will need further considerations:

- Suitable mitigation needed to address landscape, ecological and heritage matters
- Flood risk issues for some sites (surface water)
- Delivery of the level of housing proposed at Midsomer Norton is contingent on planning permission being granted for the proposed primary school at Silver Street
- Safe routes to primary schools will need to be created where lacking
- Transport, highways and access issues including the potential increased traffic level and congestion through the junction of B3355/High Street/Station Road and A362/Radstock Road in Midsomer Norton; for Radstock, the cumulative impact of development on A362 and A367 and in the case of Timsbury, the increase traffic levels on the Hayeswood Road/ North Road (B3115) through Timsbury and other rural areas
- Health facilities would require improvement particularly for Midsomer Norton/Westfield and if considered necessary, Timsbury.

SS2 Option 2. More dispersed approach avoiding the Green Belt

The alternate approach would be to distribute the growth across a wider (but still limited) range of settlements. This would result in fewer dwellings at each location. The findings of the analysis indicate that in addition to locations identified under Option 1 (Midsomer Norton, Radstock and Timsbury), still taking into account the primary school issue, there may be some potential for further growth at Clutton and Temple Cloud. Under this option, a greater number of dwellings (100) would also be allowed in other non-Green Belt villages during the Plan period. As with option 1 and following further work these villages/locations will be identified in the Draft Local Plan.

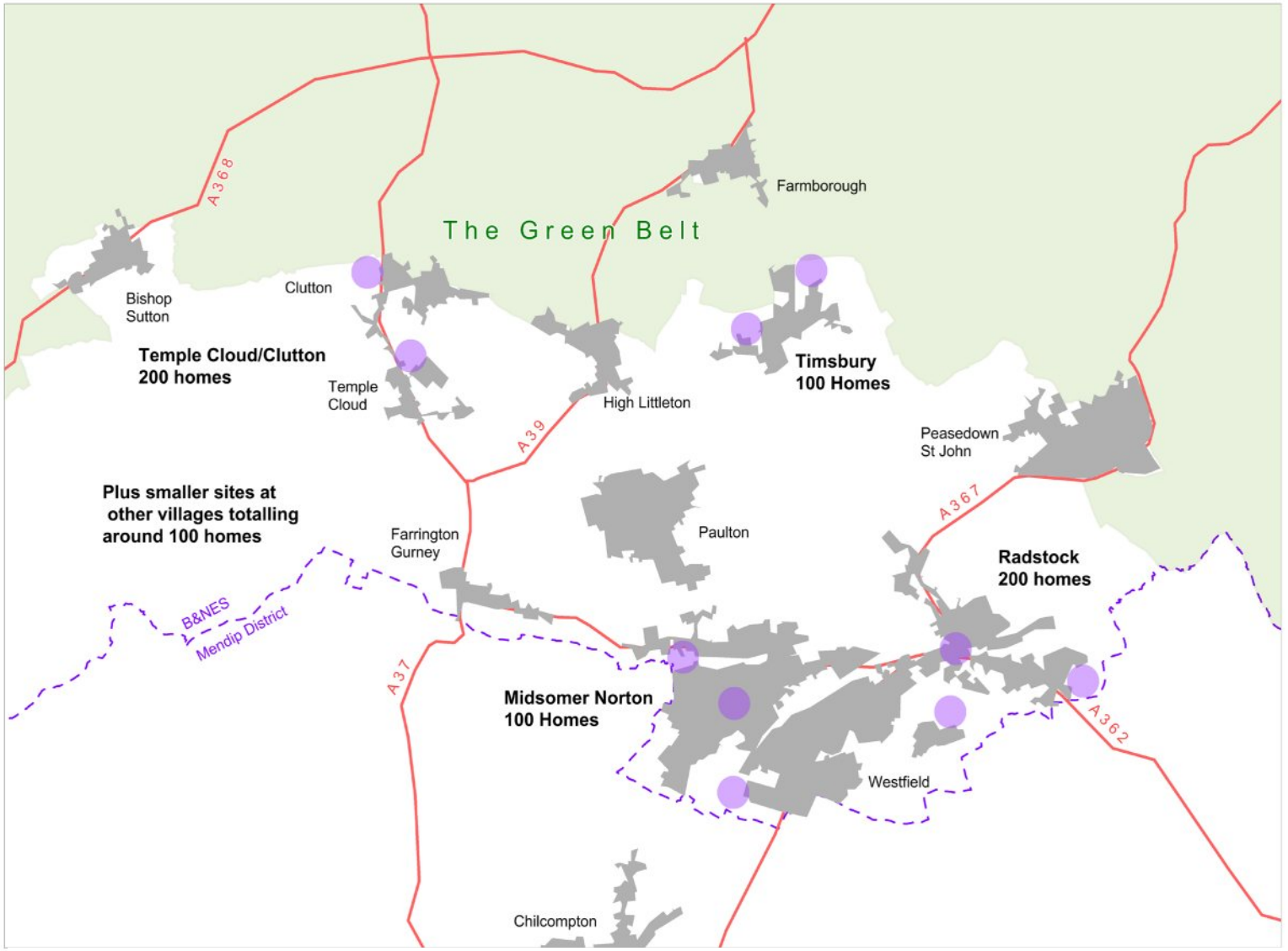


Diagram 5 - Option 2

These are not proposals and the figures are only indicative

3.10 Key impacts and issues

3.10.1 The impacts and issues identified in relation to Option 1 will also apply to this option albeit there would be a lower level of growth directed to Midsomer Norton, Radstock and Timsbury resulting in less pressure on infrastructure and services/facilities in these settlements. The impacts and issues associated with development at Temple Cloud and Clutton are summarised as follows:

- Need to take account of landscape, ecological and heritage issues, including providing suitable mitigation to ensure development does not cause unacceptable harm
- Limited local facilities, however residents could be served by bus services along the A37 corridor to access other centres
- Further investigation is needed to ensure there is sufficient primary school capacity at Clutton and Cameley school to accommodate the required additional school places, or to ascertain whether there are other feasible options
- Safe routes to primary schools will need to be created where lacking avoiding areas of poorer air quality (see below)
- Cumulative effects in developing sites may unacceptably increase traffic levels on the A37 with a resultant impact on air quality. This is especially relevant in the newly declared Farrington Gurney and Temple Cloud Air Quality Management Areas - see plans in Diagram 6.

Diagram 6 - Farrington Gurney and Temple Cloud Air Quality Management Areas

3.11 Other options considered

SS3 Combination of locations outside and within the Green Belt

If the quantum of development at the locations outlined above is undeliverable or found to be unsustainable, and if exceptional circumstances are demonstrated, the Draft Local Plan could identify land to be removed from the Green Belt and allocate sites for development. This approach would only be considered once all other non-Green Belt options had been fully explored and would focus on the most sustainable locations including suitable opportunities around Bath and other more sustainable Green Belt settlements but crucially, will also be dependent on primary school capacity. Diagram 7 illustrates such an approach. Under such an option the Council would need to be able to demonstrate that directing development to these locations would clearly outweigh potential harm to the Green Belt. Given that sustainable and suitable non-Green Belt options would need to be fully utilised first the scale of any development that would be directed to Green Belt locations is not known at this stage.

3.12 Green Belt Villages

3.12.1 NPPF, paragraph 140 states: "If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the

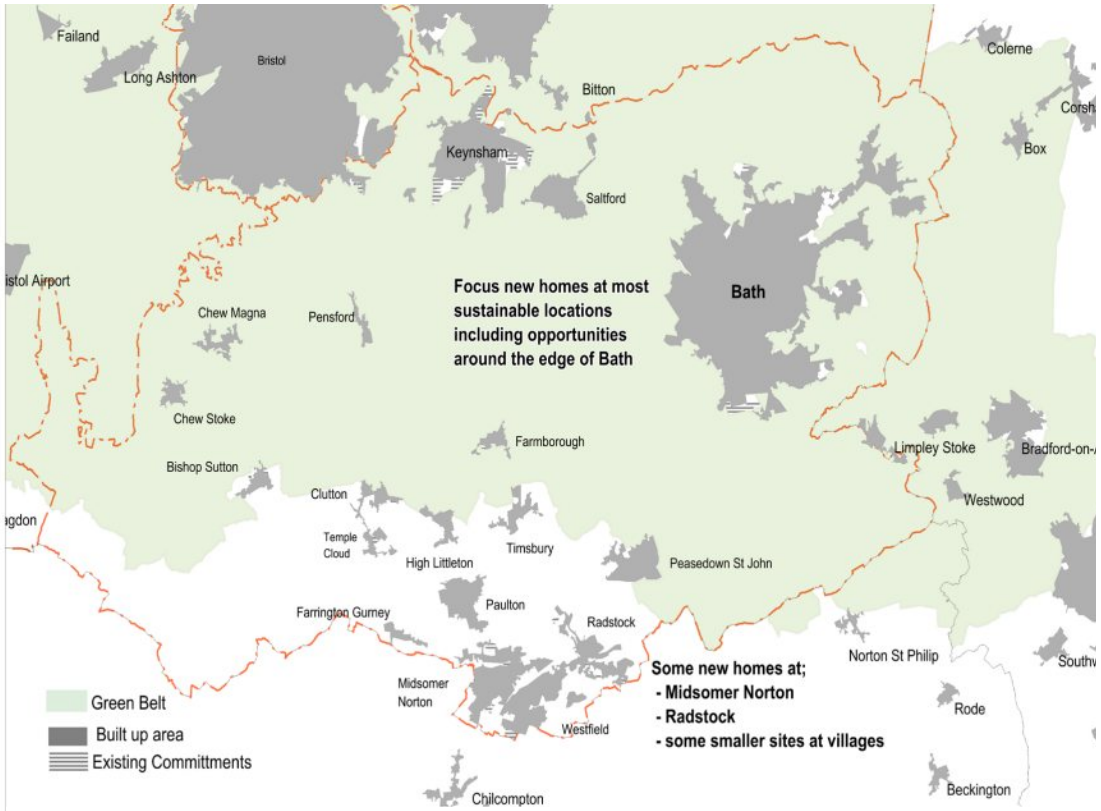


Diagram 7 - Combination of locations outside and within the Green Belt

These are not proposals and the figures are only indicative

village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt."

3.12.2 For villages included in the Green Belt additional residential development is constrained to limited infilling only. Through the Local Plan an assessment will be undertaken to determine whether the villages currently included in the Green Belt still meet the NPPF criteria (see above) or whether any of them should be removed from the Green Belt.

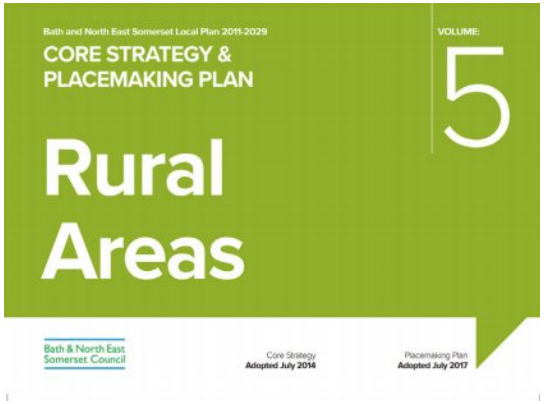
3.12.3 It is intended that this assessment is published alongside the Draft Plan, and should it be recommended that one or more villages are removed from the Green Belt 'inset boundaries' would be defined. The inset boundary to be defined will be influenced by the preferred spatial strategy i.e. whether some growth of a settlement within the Green Belt is necessary and exceptional circumstances having been demonstrated.

3.13 Next steps

3.13.1 Dependent on the outcome of the JSP examination, which sets the planning framework and housing/job numbers, and the feedback from the consultation on the Options suggested above, the preferred approach for 'non-strategic' growth in the Somer Valley and Rural Areas will need to be underpinned by further work on site capacity and whether and how the identified issues can be mitigated and/or addressed before sites are allocated in the Draft Local Plan.

3.13.2 In respect of the **Rural Areas**, a separate Rural Areas chapter is not included in this Options document but will form part of the Draft Local Plan. This will address additional housing provision required, including both through the allocation of specific sites and associated review of **Housing Development Boundaries** for villages in accordance with the preferred strategy as discussed above. This will be undertaken within the context of a review of sites already allocated in the Placemaking Plan (see table at the end of this section).

3.13.3 The Adopted Placemaking Plan **Rural Areas** volume also addresses other issues, including identifying designated **Local Green Spaces** (LGS). As set out in the Development Management Policies chapter of this document it is considered that Policy LCR6A remains fit for purpose and the designated LGS also remain appropriate given they have recently been found sound by the Placemaking Plan Examination Planning Inspector. However, should communities across the District (including as represented by parish councils) wish to propose



additional green spaces that are 'demonstrably special' to the local community for designation as LGS there is an opportunity for them to do so through responding to this Options document and/or the Draft Local Plan.

3.13.4 A number of the parishes within B&NES are in the process of preparing, or have already prepared, a **Neighbourhood Plan**. Diagram 8 below indicates the current status of each Neighbourhood Plan. The preparation of a Neighbourhood Plan is led by the Parish or Town Council and will set out planning policies for a local area. Neighbourhood Plans must have appropriate regard to national policy, including the NPPF.

3.13.5 Once 'made' (or adopted) a Neighbourhood Plan forms part of the Development Plan. However, for a Neighbourhood Plan to be successful it needs to be in general conformity with the strategic policies of the existing development plan for the local area.

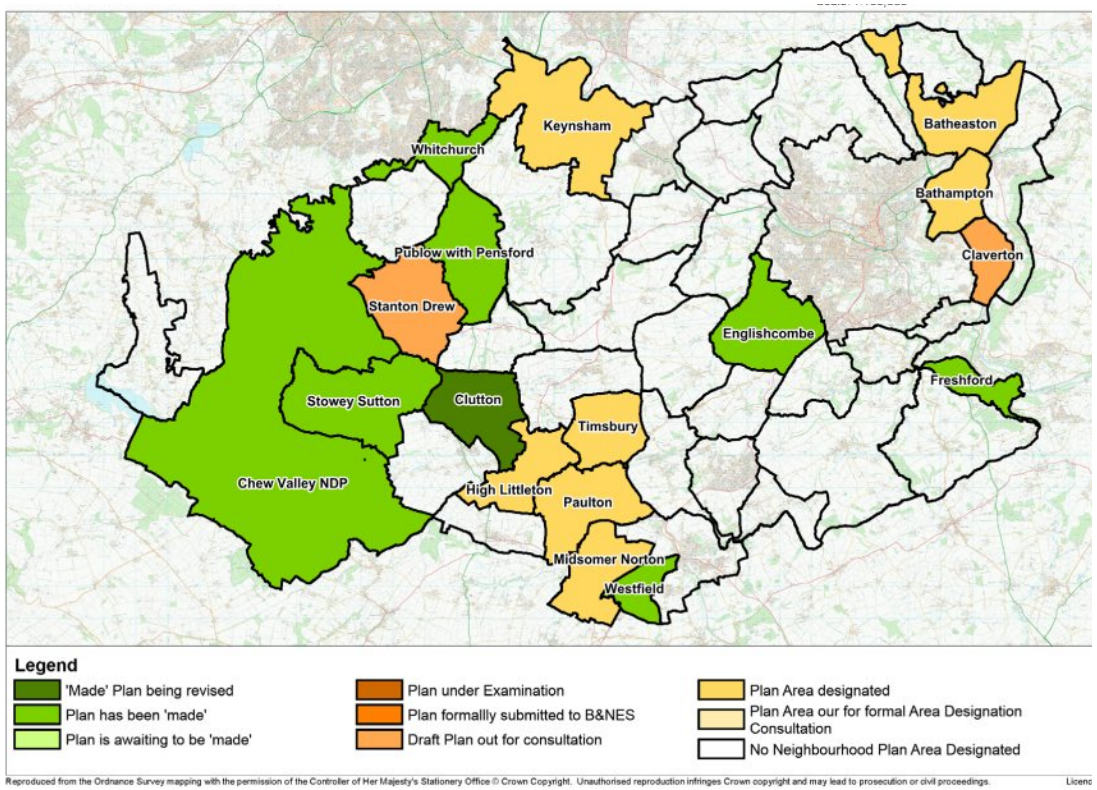


Diagram 8 - current status of Neighbourhood Plans

3.14 Review of existing Rural Areas Site Allocations

3.14.1 The table in SS4 provides an update and review of all the sites currently allocated in the Core Strategy and the Placemaking Plan.
3.14.2 Through this consultation there is opportunity to comment on the proposed approach for each policy (please make sure you specify which site you are commenting on when responding).

SS4 Please make sure you specify which site you are commenting on when responding.

Cameley & Temple Cloud

SR24. Land adjacent to Temple Inn Lane

Scheme completed, therefore this allocation will be deleted from the Local Plan.

Compton Martin

SR17. The Former Orchard

Planning application for 10 dwellings pending decision. Retain allocation.

East Harptree

SR5. Pinkers Farm

Planning application for 8 dwellings approved but scheme not started. Retain allocation.

SR6. Water Street

Planning application for 8 dwellings approved but scheme not started. Retain allocation.

Timsbury

SR14. Wheelers Manufacturing Block Works

Planning application for 26 dwellings and office space pending decision. Retain allocation.

SR15. Land to the East of the St Mary's School

Planning application yet to be submitted. Retain allocation.

West Harptree

SR2. Leafield

Scheme for 17 dwellings under construction. Retain allocation until scheme complete.

Whitchurch

RA5. Land at Whitchurch Strategic Site Allocation

Schemes on parts of the allocated site are under construction. Retain allocation until all schemes are complete.

4. Bath

4.1 Context

4.1.1 The Core Strategy and Placemaking Plan set out the strategic policies to facilitate new development in the city. Bath's outstanding historic, built and natural environment, and its sensitive management, is a key component of the identity, sense of place and future economic, environmental and health and social well-being in Bath.

4.1.2 Bath does not have sufficient land to accommodate all growth pressures in a way that is compatible with its historic, built and natural environmental quality including the World Heritage Site inscription. The capacity is further constrained by the impacts on transport. Therefore, in a city with competing pressures on space, priority is given to housing, employment space and environmental considerations with appropriate transport mitigation measures. The existing strategy reflects corporate objectives of delivering more homes and jobs.

4.1.3 Diagram 9 shows the Core Strategy Spatial Strategy.

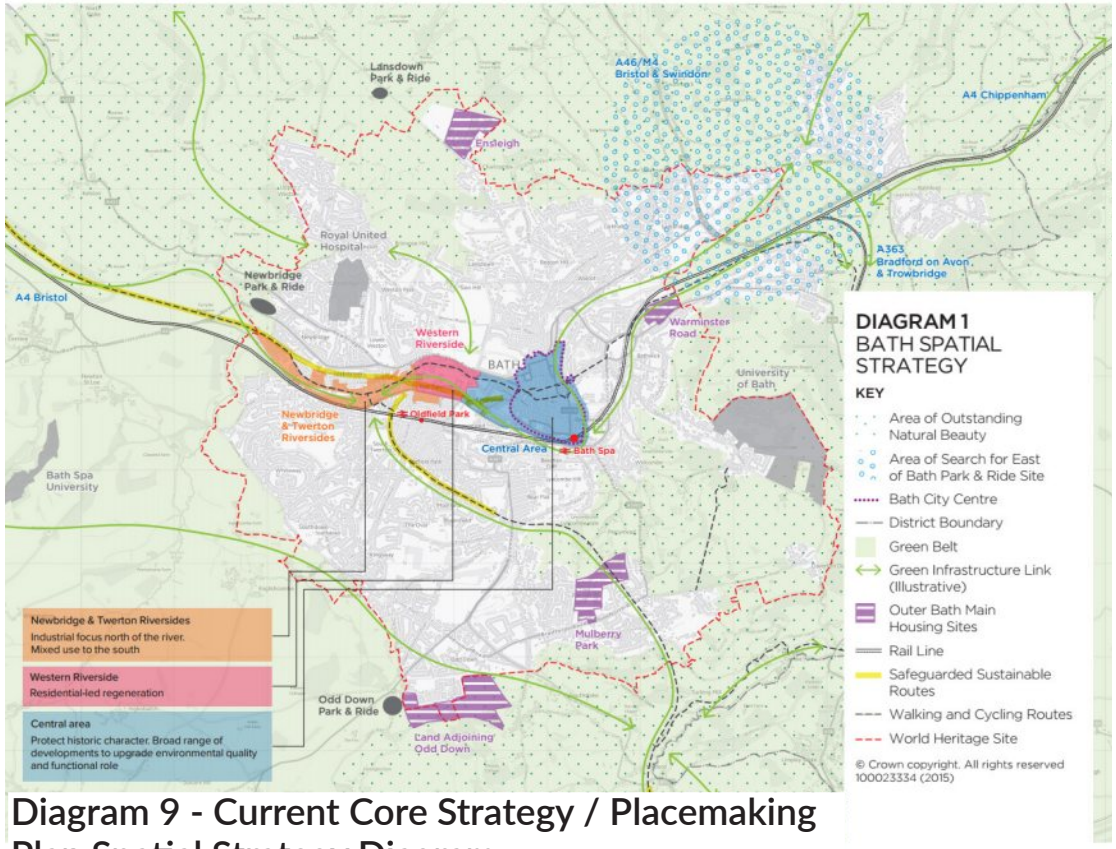


Diagram 9 - Current Core Strategy / Placemaking Plan Spatial Strategy Diagram

4.1.4 Emerging conclusions from updated evidence and monitoring show that the current spatial strategy which prioritises provision of general housing & employment space in the city is still broadly appropriate in terms of addressing the spatial priorities identified, but that some elements of the policy framework need to be strengthened in order to secure strategy delivery. The strategy and policy framework set by the Local Plan will also continue to be driven by the need to ensure the city's heritage and environment is maintained and enhanced.

4.1.5 In this chapter, the **Strategy, evidence and policy review** section sets out the topic based current policy framework, key changes since 2011 and key challenges. The key challenges identified inform **the Priorities** outlined in section 4.10. Within the context of the key challenges and priorities for the city, section 4.11 sets out the **Suggested Policy Approach.** Where it is considered that reviewing the policies is necessary potential options are also presented.

4.2 Strategy, evidence & policy review

4.2.1 The review of the existing strategy/policy entails monitoring the implementation of the Core Strategy and updating the evidence base. The analysis below summarises the key changes that have taken place and updated evidence conclusions to help identify the key challenges & priorities that the new policies should address.

4.3 Housing Provision

4.3.1 The Current Policy:

- An increase of 7,000 additional homes between 2011 to 2029 from the existing stock of around 40,000 to 47,000.
- The need to provide a significant proportion of the District's Core Strategy target of 3,300 affordable homes in Bath.

4.3.2 Changes since 2011:

- By 2018 around 2,000 new homes have been built (e.g. at the Bath Western Riverside (BWR) site and former MoD sites) including 434 affordable homes. However, despite allocating sites in the Placemaking Plan the overall supply of new homes is projected to be marginally less than the 7,000 required by the Core Strategy.
- The housing affordability ratio has significantly worsened.
- Continued growth in Houses in Multiple Occupation (HMO) and Short Term Lets is placing increased pressure on the housing stock.

4.3.3 Key challenges:

- Respond to housing shortages including affordable housing and bring forward a suitable mix of housing types and sizes to meet the range of needs, including from an ageing population, in a timely manner.
- The JSP requires an additional 300 homes to be provided in the city. (See Chapter 2)
- Manage change of use from general residential to HMOs.
- Consider how to manage the growth in the use of dwellings as Short Term Lets.

4.4 University Growth & Student Accommodation

4.4.1 The Current Policy:

- Seek to steer additional student bed spaces to University Campuses.
- Restrict student accommodation in the Central Area, Enterprise

Zone and former MoD sites where this would undermine delivery of new homes and jobs. However, there are fewer controls outside these areas.
- Current policy does not seek to control the type of student accommodation provided.

4.4.2 Changes since 2011:

- Significant growth in Purpose Built Student Accommodation (PBSA). Currently over 7,500 bedspaces are available on and off campuses and a further 500 bedspaces are in the development pipeline with planning permission.
- Recently built private PBSA is largely studio-type and many are built on former employment sites in the city.
- There seems to be an ongoing demand for HMOs as they generally provide cheaper accommodation than PBSA.
- Both the University of Bath and Bath Spa University are reviewing their growth plans including their estate management plans and campus Masterplans.
- JSP Policy 3 seeks a minimum target of 35% Affordable Housing to be delivered through self-contained C2 residential developments, including student accommodation.

4.4.3 Key challenges:

- The 2018 Bath SHMA using trend based evidence suggests significant student accommodation growth of 10,300 bedspaces up to 2036. However, the Universities are indicating lower growth than previously projected. Clear strategy is needed to accommodate university growth in a way that doesn't undermine the delivery of the plan's priorities.
- Ensure appropriate types of accommodation are provided to address student and other needs, and contribute towards reducing the pressure on HMOs.
- Some cities have started to see an over-supply of PBSAs and resultant change of use from PBSA to visitor accommodation. It is worth considering how to manage change of use from PBSAs in case such a situation arises in Bath.

4.4 Houses in Multiple Occupation (HMO)

4.4.1 Current Policy:

- Article 4 Direction requires a planning application for change of use from a dwelling house (C3) to HMO (C4/sui generis).
- PMP Policy H2 sets the criteria for change of use - supplemented by the HMO SPD that sets out the criteria to avoid over concentration of HMOs and addresses amenity issues for neighbours (sandwich policy & 10% threshold).

4.4.2 Changes since 2011:

- Continued demand for HMOs (student & non-student). More properties that are suitable for families (some of which are close to schools) are being converted to HMOs. This is due

to affordability and students preference for living in the city.

- Additional Licensing is to be extended to the whole city in January 2019 i.e. all small and large HMOs will require a license. The licensing regime will help address the safety and quality of HMO properties, as well as help the Council to better understand exact locations and number of the HMO properties.

4.4.3 Key challenges:

- PMP Policy H2 does not apply to new build HMOs, PBSA or extensions to existing HMOs.
- Continued demand for HMOs reduces the availability of family homes.
- Limiting the further availability of HMOs may have a significant impact on certain sections of society such as young professionals and those working within service industries.
- On-street parking issues need to be investigated (see chapter 8).

4.5 Employment provision

4.5.1 The Current Policy:

- A net increase of 7,000 jobs and diversifying the economy by focusing on 'high value' sectors.
- A significant net increase of office premises (40,000m2), focused mainly in the Central Area/Enterprise Zone such as Bath Quays North.
- Allowing for a managed contraction of industrial floor space (net loss 40,000m2).

4.5.2 Changes since 2011:

- Bath Enterprise Area has now been upgraded to an Enterprise Zone with the benefits of incentives and additional funding to facilitate business creation
- A net loss of office floorspace of over 8,000 m2 (largely through permitted development), but the plan is still on track to deliver 40,000 m2 of new office floorspace by 2029. However, this assumes implementation of all existing planning permissions and local plan allocations.
- A net loss of Industrial floorspace at a faster rate than planned. Overall net losses are forecast to be around 60,000 m2, largely due to losses to student accommodation (net loss from 2011 – 2016 is approximately 30,000 m2).
- Employment has increased by 159 jobs (net) between 2011 -2016.
- Continuing buoyant demand for office space and greater demand for industrial space in the city (than was anticipated at the time of preparing the Core Strategy).

4.5.3 Key challenges:

- • Need to investigate whether and how demand for office and industrial space in the city can be met within the context of competing land uses delivering higher values. The new Local Plan will need to be aligned with a review of the Economic Strategy.

- Limited opportunities to make further provision for employment space, therefore protecting both existing & committed office and industrial space in the city will be of high importance.

4.6 Retail and City Centre

4.6.1 The Current Policy:

- Ensure that the shopping core successfully absorbs development and change at Southgate.
- Enable small to medium sized comparison retail development that improves the shopping offer.
- Focus additional convenience retail floorspace within and on the edge of existing centres, before considering out-of-centre sites that could improve the spatial pattern of provison across the city.

4.6.2 Changes since 2011:

- Additional food store floorspace provided along Lower Bristol Road has improved the range and offer in Bath.
- Some limited additional comparison provision (bulky goods) has been delivered.
- Vacancy rates which remain below the national average have increased in the city centre.
- Public Realm and Movement Strategy for Bath city centre was adopted in March 2010 which is founded on the historic development of the city and puts forward an incremental plan for improving the public realm. This is supplemented by the Bath Pattern Book. Within this context some public realm improvement projects have been delivered e.g. High Street, Stall Street and Saw Close.

4.6.3 Key challenges:

- Capacity for additional retail floorspace is reduced from the previous study, but there is still some capacity for a small/ medium size food store. No qualitative need is identified given the existing good range of shops.
- Priority should be to retain existing shops and address vacancies.
- Make sure that the shopping experience offered by the city centre is maintained and enhanced and further redress deterioration of the public realm. The historic built environment is fundamental to the delivery of effective public realm improvements.
- Maintain the city as an important visitor destination and manage the environmental impacts of tourism.
- The recent traders survey shows that independent traders are serving a wide catchment and play an important part in serving the shopping needs of tourists/ visitors. Need to consider how these independent traders could be supported or protected.

4.7 Visitor Accommodation

4.7.1 The Current Policy:

- To manage the provision of 500-750 new hotel bedrooms from 2011 to 2029 to widen the accommodation offer for the city.

4.7.2 Changes since 2011:

- Around 1,126 rooms have been built or are committed (greater than the policy target up to 2029).
- There has been rapid growth in the short-term letting of residential properties placing pressure on the existing housing stock.
- Short-stay bookings through various booking platforms such as Air B&B are impacting on traditional B&B/Guest House sector and some short term let properties (particularly 'group houses) appear to be causing issues including noise and nuisance to the neighbouring properties.
- Some PBSA are available as short term lets to non-students. This may indicate an existing or future over supply of PBSA and there might be a need for considering introducing a policy framework to manage the change.
- Bath hotels generally achieve high occupancy rates with high room rates on Friday/Saturday. However, midweek occupancy is not full. Hotel sector generally continues to perform well and there is continued operator demand for further space.
- Visitor Accommodation Study shows reduced market potential for further hotel development in Bath. Some limited capacity for budget hotels but not before 2021 and no more market capacity for high end hotels during the plan period (low growth) or until the second half of the Local Plan period (high growth).

4.7.3 Key challenges:

- Continued pressure for further hotel space in the city (especially budget hotels in the short term) to be considered in the context of scarcity of land in the city and overall operation of the visitor economy.
- Seek to achieve optimal occupancy of hotels in the city e.g. improving mid-week hotel occupancy by initiatives including encouraging corporate/residential conference market.
- Seek to manage the growth of short term letting of residential properties (although measures are generally outside the scope of the Local Plan).

4.8 Transport

4.8.1 Current Policy:

- Implement improvements to walking, cycling and public transport infrastructure, as set out in the Bath Transport Strategy, to improve connectivity to and from areas of housing, employment and neighbourhood centres.
- Deliver 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 (including managing car parking provision in the city centre and increasing park & ride provision on the edge of Bath).
- Implement the Parking Strategy and the Air Quality Action Plan for Bath.

4.8.2 Changes since 2011:

- 'Balancing Your Needs: A Parking Strategy for Bath and North East Somerset' was adopted by B&NES on 14th September 2017.
- Congestion on parts of the road network within Bath has worsened, especially in the weekday 7:00-10:00am and 3:00-7:00pm periods.
- The Council has determined not to progress sites at Mill Lane for the provision of a new park & ride facility to the east of the city and will continue to explore other options.
- The Air Quality Management Area that was originally designated in 2002 has been most recently expanded in 2013 and now covers most of the principal road network in central Bath. The Council has been directed by the Joint Air Quality Unit (JAQU) to produce a plan by 31 December 2018 on how it will reduce nitrogen dioxide levels in the shortest time possible and by 2021 at the latest. It is consulting on the introduction of a Clean Air Zone which is a designated area within which drivers of designated higher emission vehicles will be charged. Alongside the Clean Air Zone, other supporting non-charging measures are also subject to public consultation, such as the operational extension of Park and Ride sites.

4.8.3 Key challenges:

- The JSP requires the Local Plan to identify and allocate strategic development sites in North Keynsham and Whitchurch, an additional 300 homes in Bath, plus non-strategic sites to accommodate around 700 homes. The transport implications for the city will be carefully considered in assessing potential development sites.
- Managing parking provision within the city. The PMP set parking standards for various uses but the standards for Residential, Purpose Built Student Accommodation and Houses in Multiple Occupation need to be reviewed. (Please see Chapter 8)
- The B&NES highway network remains heavily trafficked, highlighting the need to undertake transport and access improvements and major capital infrastructure projects to facilitate growth in housing numbers and jobs, to minimise the adverse effect of traffic, and to enable environmental improvement particularly in areas of historic significance.
- The need for new development is balanced with minimising traffic congestion and making places more accessible by sustainable modes of transport.
- Need to deliver phased expansion of the existing Park and Ride sites and new Park and

Ride provision to the east of the city.
- Improve air quality.

4.9 Historic and Natural Environment

4.9.1 Current Policies:

- Sustain and enhance the significance of the city's heritage assets, including the Outstanding Universal Value of the City of Bath World Heritage Site and its setting, Listed buildings, the Bath Conservation Area and their settings, archaeology, scheduled ancient monuments, and historic parks and gardens, as well as non-designated heritage assets of local interest and value.
- Core Strategy & PMP policies are supplemented by SPDs and other documents such as the City of Bath World Heritage Site Setting SPD, Building Heights Strategy, World Heritage Site Management Plan, and Conservation Area Character Appraisals.
- Bath's outstanding historic environment, and its sensitive management, is a key component of the identity, sense of place and future economic, environmental and health and social well-being in our area, and the delivery of sustainable development.
- Bath is also surrounded (apart from on its south western side) by the Cotswolds Area of Outstanding Natural Beauty (AONB). The current policy framework protects the AONB and seeks for it to be maintained and enhanced.
- The Bath and Bradford-on-Avon Special Area of Conversation (SAC) which is centred on the Combe Down Stone Mines is designated in order to protect the significant population of European protected species of bats. Development and change needs to avoid a significant effect on the bats, including their roosting and foraging areas.

4.9.2 Changes since 2011:

- Work to complete a character appraisal for Bath Conservation Area is being undertaken by the Council with input from Bath Preservation Trust, Historic England and other local organisations.
- The new NPPF states that the Plan should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.
- The Historic Environment Topic Paper provides an opportunity to consider the importance of the historic environment in the Council's area and the existing & further work by which the planning system can facilitate its conservation, enhancement and enjoyment by all.

4.9.3 Key challenges:

- Continue to assess and protect the significance of all heritage assets, including listed buildings as part of any proposal.

- Sustain and enhance the area's historic environment in allocations sites, drawing particular attention to heritage assets and their setting.
- Continue to protect and restore scheduled ancient monuments as part of development proposals and to protect the setting of scheduled ancient monuments.
- Maintain a strong presumption against development that would harm 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.
- Continue to work with partners to resolve long standing high profile heritage sites at risk (for example, the former King Edward's School and Cleveland Pools in Bath and the Wansdyke) as well as lower profile heritage at risk sites.
- Consider how Design issues (including Building Heights) can be addressed through guidance to inform the submission and determination of planning applications.
- Continue to seek to prepare conservation area character appraisals for Bath Conservation Area
- Greater recognition of local heritage assets.
- Ensure development and change avoids any likely significant effects to the SAC and the protected population of bats
- Manage change and development to ensure it is appropriate within the context of the Cotswolds AONB
- Detailed site allocations for additional 300 dwellings will need to address potential impact the Bath & Bradford on Avon SAC

4.10 Spatial Priorities for Bath

4.10.1 Based on the Core Strategy/ Placemaking Plan and the messages from evidence, the spatial priorities to be addressed in Bath are set out below. These will help inform a reviewed/refreshed vision and strategy.

4.10.2 Key priorities underpinning any options include:

- Maintain and enhance natural, historic and built environmental assets and quality recognising statutory requirements
- Maintain and emphasise the priority for delivering new housing (excluding student accommodation), especially affordable housing in light of tight supply and worsening affordability in the city
- Increase the provision of employment space by delivering the planned additional office floorspace to meet demand and provide greater protection of existing office and industrial space
- Facilitate the delivery of transport infrastructure improvements needed to encourage sustainable travel, tackle congestion, reduce emissions from vehicular traffic and to improve journey time reliability
- Be more directive about on-

campus University growth/PBSA and ensure PBSA meets student demand to help address HMO pressure. Restrict off-campus growth.

- Address parking issues arising from PBSA & HMOs.
- Manage and improve air quality in the city, specifically within the Air Quality Management Areas.
- No planned provision for further hotel growth in short term and investigate managing short term holiday lets growth.
- Consider a broader strategy for the City centre and local centres to enable flexibility to facilitate and encourage a range of uses, including shops, that maintain a healthy city centre (e.g. child care, community centres, vets, cafes etc) and ascertain demand for creative space.
- Maintain or provide appropriate social and environmental infrastructure to address existing deficiency and future requirements.

4.11 Strategy & policy options

4.11.1 The current strategy of prioritising the limited land/sites in Bath for housing (not including student accommodation) and employment space within the context of the City's outstanding natural and built environment continues to be appropriate. However increasing pressure for PBSA, HMOs and visitor accommodation at the expense of other uses, justifies strengthening the existing policy framework to support delivery of jobs and general housing. The section below outlines the proposed policy approach across the issues outlined above and focusses mainly on the issues that require review.

4.12 Employment

4.12.1 The amount of growth in employment floorspace outlined in Core Strategy Policies B1 & B2 will be updated in the Draft Local Plan reflecting the overall level of job growth set by the JSP.

4.12.2 As set out above the plan is still on track to deliver net growth in office space of around 40,000 m2 by 2029, but industrial space is being lost at a faster rate than planned largely due to the construction of student accommodation.

4.12.3 There are limited opportunities to make further provision of employment land within the city and therefore, protecting both existing and committed office and industrial space in the city will be of high importance, especially in the context of losses and pressure from new PBSA development. Provision of industrial land elsewhere in the District is also an important element of the strategy in helping to meet demand for premises in Bath and this needs to be considered when proposing development in the North Keynsham SDL, Somer Valley Enterprise Zone and extensions to exisiting industrial estates in the District.

4.12.4 This would require strengthening of the existing policy framework in terms of protecting office/industrial space. Please see Chapter 8a Proposed Policy Approach DM11 and DM12 the review on

BTH1 Policy approach Options for employment

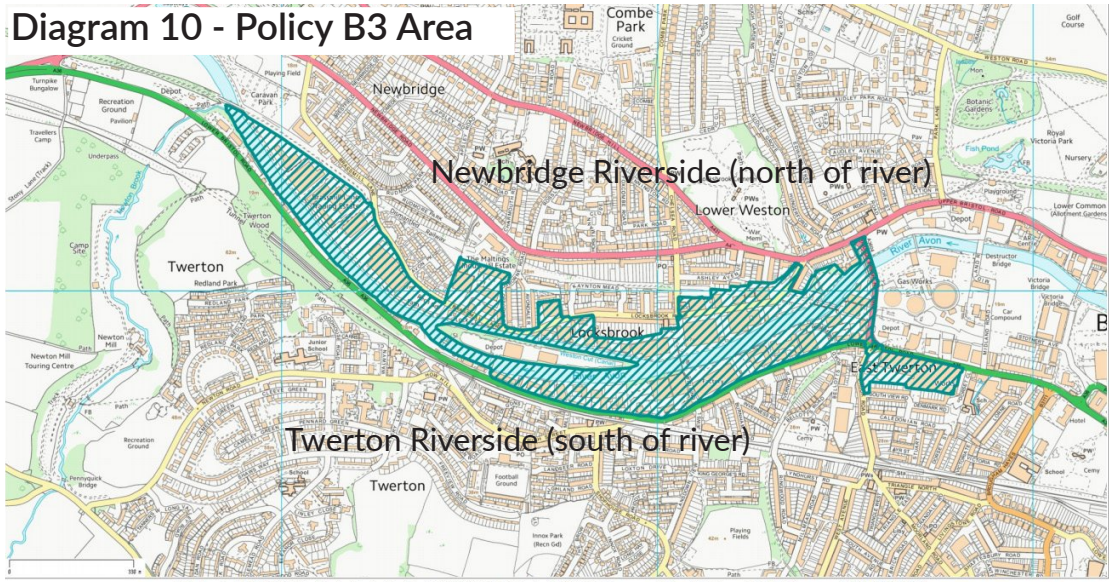
1. Amend Policy B3 for Twerton Riverside so that it more strongly protects the remaining industrial space for industrial uses. This would work in tandem with the proposed strengthening of Policy ED2B (see proposed policy approach DM11 in the Development Management chapter page 145)

2. Maintain current Policy B3 approach but with specific reference to excluding development of PBSA, thereby providing greater flexibility to facilitate a mix of employment space and housing.

economic development policies.

4.12.5 Policy B3 identifies Newbridge Riverside as Bath's primary location for industrial uses and is classified in the PMP as a Strategic Industrial Estate. Therefore there is a presumption in favour of retaining land and premises in the B1,B2 and

Diagram 10 - Policy B3 Area



Date Created: 7-11-2018 | Map Centre (Easting/Northing): 372731 / 165182 | Scale: 1:10700 | © Crown copyright and database right. All rights reserved (100023334) 2018

B8 use class in this area. However Twerton Riverside is not identified as a Strategic Industrial Estate and is indicated in Core Strategy Policy B3 as suitable for a broader range of uses, providing new business premises, including those displaced from more central areas of the city, and housing. Recently much industrial land has been lost to PBSAs reducing the flexibility the Policy is intended to provide.

4.13 Housing

4.13.1 The targets for new housing and its broad distribution for the new Local Plan are largely set by the Joint Spatial Plan. For B&NES, the JSP proposes a requirement to plan for 14,500 new dwellings by 2036. The JSP proposes that around 300 more dwellings (in addition to those currently committed in the Placemaking Plan and through planning permissions) are provided through 'urban intensification' within Bath.

4.13.2 The table on page 52 shows the progress of allocated sites through the development process and related review of the associated PMP policy. Comments are welcome in relation to these sites allocated through the PMP.

4.13.3 The B&NES Housing and Economic Land Availability Assessment (HELAA) 2018 has identified a number of potential development sites that might be suitable for residential or mixed use development. Sites that are currently classified as 'suitability not proven' in the HELAA will be the first focus of further assessment to determine whether they should be allocated for development to include housing. New brownfield opportunities to be considered could include sites such as Twerton Park Football Ground (if it were to be promoted for improvement and redevelopment) or the Bath Community Academy (BCA) site. The future use of the BCA site needs to be considered within the context of its potential to play a continuing role in terms of education provision within the city.

BTH2 Proposed Policy approach for housing

The Draft Local Plan will identify and allocate opportunities to provide an additional 300 dwellings in Bath, which might include:

- New brownfield sites (not already allocated)
- Redevelopment or intensification of existing housing areas including surplus garage sites
- Previously discounted sites
- More intensive use of existing allocations

Due consideration will be given to assessing impact on other elements of the strategy particularly in relation to protecting employment land.

4.13.4 The current broad assessment of potential development opportunities within Bath indicates that 300 dwellings can be accommodated through:

- New brownfield sites (not already allocated)
- Existing housing areas including surplus garage sites.
- Reappraisal of previously discounted sites
- Change of use from offices until Article 4 is implemented
- Review and potentially more intensive use of existing allocation sites.

4.13.5 In providing new homes in the city further assessment will also be undertaken regarding the size, tenure and type of housing that should be provided based on evidence of need.

4.14 Retail

4.14.1 The Retail Study 2018 indicates that the level of choice of shops is considered to be good in Bath.

4.14.2 The Study identified some capacity for additional small/medium size food stores in the short term, but it is not considered necessary

to allocate any specific sites in the Local Plan due to the good range of stores available in the city. In relation to comparison goods shopping, the heritage based attributes of the city, including the large volume of visitors, has enabled the city centre to support a good selection of comparison goods retailers and the Southgate development has, in recent years, been able to offer large modern retail premises which have been lacking in other parts of the city centre. In relation to bulky comparison goods, the Lower Bristol Road area has been seen as a key location for the provision of retail premises to meet this need. Therefore there is no urgent or significant qualitative need for new net additional comparison goods floorspace in Bath.

4.14.3 As such it is considered that the existing policies provide an appropriate framework to facilitate retail development in the city.

4.14.4 Retaining existing shops and addressing vacancies are important priorities moving forwards. In terms of retaining existing shops, Bath has more independent traders than comparable historic city centres across the country and evidence suggests that the independent retail sector makes a significant contribution to the overall retail offer and attractiveness of Bath city centre. Further analysis needs to be undertaken to understand the interrelationship with small/ independent retailers, vacancy rates, rent levels and the size of available units. From this analysis the Council will consider whether the Local Plan can assist in their protection.

4.15 Visitor Accommodation

4.15.1 Given significant recent growth and schemes in the pipeline there is no short term need for further hotel development. The Visitor Accommodation Study shows that the market is unlikely to be able to support additional higher end hotel development before around 2030, however there is likely to be some limited 'market' capacity for budget hotels after 2021.

4.15.2 Within the context of recent growth, hotel provision in the pipeline with planning permission plus the limited space/land available in city, it is not considered necessary or appropriate to identify and allocate any specific sites for hotel development. The allocation of city centre sites for development for other higher priority uses such as residential and offices is a means by which further city centre hotel development can be managed.

4.15.3 Recent growth in properties available as short term holiday lets (both small and large including party houses) has significant implications for the city such as on availability of housing for residents, residential amenity and operation of other forms of visitor accommodation such as guest houses.

4.15.4 There are currently limited ways to manage these short term lets properties, and these lie outside the planning system. In order to exert planning control against the use of these properties as short term lets, a change at a national level to the Use Class Order to create a new use class would be required. More

BTH3 Proposed Policy Approach for visitor accommodation

To not specify hotel bedroom growth targets in the Local Plan policy and to not identify or allocate sites for further hotel development in the city. This approach would be reviewed as part of the 5 year review of the Local Plan and in the context of updated evidence.

effective ways to manage short term lets would be to introduce a licensing scheme, but such licensing is primarily about ensuring tenants' safety rather than controlling the number or location of property type. The Council is unable to introduce a licencing scheme without a change to national legislation.

4.16 Bath's Universities

4.16.1 The University of Bath (UoB) and Bath Spa University (BSU) both play an important role in the economy and life of the city. Whilst both are beneficial to the city, their recent growth and future aspirations have significant implications for the city in terms of the pressure on the existing housing stock through the creation of Houses in Multiple Occupation (HMOs); impact on the communities where HMOs are concentrated; and demand for the limited supply of land which is available for development within the city, particularly affecting employment land.

4.16.2 The previous Local Plan consultation considered various options for responding to the universities' growth and student accommodation demand. Responses included:

- Further PBSAs should only be allowed on the campuses. Priority should be given to creating more jobs and homes for workers, first-time buyers and other aspects of Bath's own population's housing needs. Need to consider the provision of affordable accommodation on campus.
- PBSA development should make a financial contribution for community facilities and affordable housing.
- Additional PBSA can help to address the HMO pressure.
- If PBSA is to be built outside of campus, they should be included in the HMO cap (10% proportion) – so that areas such as Oldfield Park and east Twerton do not get more student accommodation. Social imbalance has already reached unacceptable levels.
- Further academic space must be supported by the provision of additional student accommodation on-campus (including 2nd & 3rd year students) and accommodated within the existing core campus.
- Student numbers should be capped and student accommodation should be kept on campus in order to reduce traffic pollution and make roads less congested without university buses. This will also protect the local community for families and older people who are long term residents and protect office space.
- No further release of Green Belt land.

- Need to recognise the economic contributions made by the universities and the growing association between universities and businesses in terms of education and research, and the importance of that relationship in developing a skilled workforce, job creation, business innovation and growth, and new company formation.

4.16.3 Key challenges are to try to facilitate University success while ensuring the delivery of planned economic and housing growth, within the context of the environmental capacity. Understanding the universities strategies, including growth plans and campus estate plans, is essential to balancing competing needs. The Council has been working closely with both universities and has received their updated growth plans. Both the growth plans submitted show lower growth than previously forecast. This reflects the lower undergraduate intakes in 2018, the difficult operating environment for the Higher Education sector and demographic changes.

4.16.4 Table 1 shows the student forecast and accommodation requirements. The figures are explained below:

- **'Combined student forecast'** is based on both the universities' growth plans.
- **'Combined Housing Need'** - not all students require accommodation as some live at their family home, taking a year out or undertaking 'on-line' courses, therefore it is assumed that 78% of the UoB students and 56% of BSU students require student accommodation.
- **'Total PBSA bedspaces'** takes into account the existing and recently permitted development.
- **'Cumulative residual bedspace demand'** is the cumulative residual figure after taking 'total PBSA bedspaces' from the 'Cumulative combined Housing Needs'. This is presented as cumulative figures, not the need for each year. In 2018/2019, there are 10,822 bedspaces as the residual bedspaces demand. This is an indicative figure and shows that 10,822 students were accommodated in HMOs or other means of accommodation. It is important to note that this is based on an assumed (rather than actual known) proportion of students requiring housing. Even though these figures are agreed by the universities, it is difficult to be accurate therefore it is indicative only.
- **'Cumulative additional bedspaces needed from the 2018/19'** shows cumulative additional bedspaces needed associated with the student growth. It shows 494 bedspaces needed by 2025. If no further PBSAs are built 494 bedspaces would equate to around an additional 124 HMOs (as 1 HMO = 4 students).

4.16.5 The Topic Paper on the Universities sets out further analysis and explains the universities' plans separately. But in summary, the priority for the **University of Bath** is to increase the size of its postgraduate student population and stabilise the size of its undergraduate intake and focus on enhancing the

student experience. As a result, the University forecast only modest growth in its undergraduate population reflecting the pipeline effect of stabilising its undergraduate intake at 2015 levels whilst forecasting growth in its postgraduate numbers. The University has launched the first Master's level degree apprenticeship using a variety of distance-learning techniques and is also working on online programmes due to be launched in 2019 which will not require full time campus attendance. i.e. the proportion of students requiring accommdation may need to be reviewed.

4.16.6 Given the unprecedented levels of uncertainty surrounding the mid to long term future of UK Higher Education funding and recruitment patterns, the UoB is forecasting minus 1.0% to plus 1.0% per annum growth beyond 2022/23. Therefore it is agreed that the Local Plan is based on maintaining numbers at the forecast 2022/23 level through to 2035/36. The forecast will be revisited as part of the 5 year review after the adoption of the Plan.

4.16.7 For **Bath Spa University**, the University is reviewing future

	2016 /17	2017 /18	2018 /19	2019 /20	2020 /21	2021 /22	2022 /23	2023 /24	2024 /25	2025 /26	2035 /36
Combined Student Forecast *	25,149	25,971	25,867	26,089	26,608	26,842	27,007	27,100	27,200	27,300	28,300
Combined Cumulative Housing Need	17,797	18,426	18,362	18,559	18,944	19,099	19,194	19,246	19,302	19,358	19,918
Total PBSA bedspaces	7,176	7,247	7,540	7,633	7,900	8,042	8,042	8,042	8,042	8,042	8,042
Cumulative residual bedspace demand			10,822	10,926	11,044	11,057	11,152	11,204	11,260	11,316	11,876
Cumulative additional bedspaces needed from the 2018/19 baseline				**104**	**222**	**235**	**330**	**382**	**438**	**494**	**1,054**
Cumulative additional HMOs needed if no further PBSAs are built (1 dwellings =4 bedspaces)				26	56	59	82	96	110	124	264

Table 1 - Combined forecast demand for student accommodation based on the Universities' Growth Plans

*This based on the University of Bath modestly growing postgraduate numbers and then maintaining the overall student figures at the 2022/23 level through to 2035/36; and Bath Spa University remaining broadly static until 2022/23 and then increasing slowly by 100 students per year to 2035/36.

growth and its estate management, potentially consolidating its estate & sites presence within the city. Their growth plan shows a reduction of student numbers in the next few years followed by a steady increase. The university has indicated an estimated increase of 100 students per annum from the forecast 2022/23 level through to 2035/36 which equates to an additional 560 bedspaces from 2022/23 to 2035/36. As above, the forecast will be revisited as part of the 5 year review after the adoption of the Plan.

4.16.8 The University Growth Plans submitted are only up to 2022/23, they can only realistically plan for 5 years and given the medium and long term uncertainty in the Higher Education sector, it is proposed appropriate to plan for no more than the first 10 years of the Local Plan period as illustrated in the Table above.

4.16.9 Core Strategy Policy B5 restricts student accommodation within the Central Area, Enterprise Zone and former MoD sites where this would adversely affect the delivery of jobs and homes and PMP Policies SB19 and SB20 set out site specific requirements for the UoB and BSU.

4.16.10 The UoB is in the process of preparing a new masterplan for the Claverton Campus. Subject to further work and evidence demonstrating that environmental impacts (including on AONB) can be appropriately mitigated there may be sufficient capacity on the Claverton Campus to accommodate forecast further growth for both academic space and student accommodation (see section 4.19 below).

4.16.11 BSU is also in the process of commencing work on a new masterplan for Newton Park Campus, to supersede the existing masterplan. The capacity of the Newton Park Campus to accommodate additional development is not confirmed at this stage. (see section 4.20 below)

4.16.12 There are currently over 800 bedspaces provided by private student accommodation providers in the city and this will increase to about 950 bedspaces once all permitted planning applications are implemented. These bedspaces are currently occupied by students from both the UoB and BSU. If additional PBSA is built on the UoB Claverton campus this could 'free-up' some private accommodation bedspaces for nomination and occupation to BSU students.

4.16.13 Given forecast slower future growth rate for both Universities, the initial indications of capacity work for Claverton Campus to accommodate new student accommodation and the flexibility provided within the existing and committed private sector accommodation, it is at this stage considered approprate to prioritise new student accommodation development on campus, rather than making provision elsewhere in the city. This is reflected in the policy options below, which would replace Core Strategy Policy B5.

4.16.14 Core Strategy Policy B5 also restricts teaching space within the Central Area, the Enterprise Zone and former MoD land. It is assumed that much new teaching space will lead to more students, however

both universities also have plans to maintain and upgrade existing buildings. The redevelopment and upgrading of some existing buildings helps achieve operational and student experience improvements, but does not necessarily lead to an increase in student numbers. Understanding whether new academic space improves existing facilities or increases student numbers is essential in determining whether additional student accommodation is required. Where it will lead to increased numbers of students it is proposed that an application for new academic/teaching space must be supported by the provision of additional equivalent student accommodation on campus.

BTH4 Proposed Policy Options for student accommodation and University and academic & research space

3 alternative options are presented

1. New student accommodation and academic/research space to be facilitated on campuses. Proposals for new student accommodation and academic/reserach space within the city outside the university campuses will be refused.
2. New student accommodation to be accommodated on campuses only, but academic/research space can be accommodated in the city where it does not harm the other objectives of the Plan.
3. Focus new student accommodation and academic/research space on campus and only allow such development in the city and elsewhere where it does not harm the other objectives of the Plan, particularly the delivery of housing & employment.

For all 3 options proposals for new academic/research space will need to demonstrate whether it results in additional students and, if so, how and where the new students will be accommodated (within the context of the default option being on the campuses). Also new PBSAs will need to be directly operated by the University of Bath or Bath Spa University or the development must have a nomination agreement for occupation by students of these two universities.

4.17 Affordable student accommodation

4.17.1 Affordability of student accommodation is one of the key issues identified through the previous consultation. Many recently built PBSAs are of the studio type with rental values beyond the affordability of many students.

4.17.2 The right types of PBSA with appropriate rental values in the right locations can address general affordability issues raised by students, as well as help manage the demand for further HMOs. In general, second and third year students prefer to live

in shared housing such as HMOs. This may be due to the experience of sharing a house with friends, but also due to the cost which is generally less than many existing PBSAs. If more affordable student accommodation becomes available it could start to free up existing HMOs occupied by students to non-students such as young professionals, key workers and people working in the services industries. Therefore, in line with the JSP approach, a new policy is proposed to require at least 35% of the accommodation to be available as affordable rent.

4.17.3 The Visitor Accommodation Study identified that some of the PBSAs are available for non-students throughout the year. In order to ensure the bedspaces built for students are avilable for students, the new policy will also set out a relevant criteria in determining an application for a new PBSA.

BTH5 Proposed Policy approach for affordable purpose built student accommodation

New PBSA should provide at least 35% of the accommodation as affordable rent. (The definition of affordable rent is a PBSA bedroom that is provided at a rental cost for the academic year equal to or below 55% of the maximum maintenance loan, which is the rate for students living away from home – outside London set by the Government). New PBSA should be available exclusively for students in term time – (non-student use is only allowed outside term times.)

4.18 Large-scale purpose-built shared living

4.18.1 Evidence suggests that housing affordability has significantly worsened in recent years. The Council has adopted an Article 4 Direction to remove a permitted development rights for conversion from residential use class C3 to HMO C4 in July 2013. Placemaking Plan Policy H2, supplemented by a HMO SPD, sets out criteria and restricts new HMO in areas of high HMO concentration. This might have some negative impact on the availability of lower priced rental properties. 'Large-scale purpose built shared living developments' may provide a housing option for single person households who cannot or choose not to live in self-contained homes or HMOs. 'Large-scale shared living development' is a purpose built cluster flat similar to PBSA but built specifically for the general population. The proposed policy approach is required to ensure that new purpose

BTH6 Proposed policy approach: for large-scale purpose-built shared living

Establish criteria to determine applications for 'large-scale purpose-built shared development' and to facilitate change of use from purpose built student accommodation to appropriate forms of non-student residential.

built shared living developments are of acceptable quality, well managed, and integrated into their surroundings. To ensure this form of accommodation meets its specific housing need, it is important that a minimum tenancy is set to avoid operation as a hostel. (see also the discussion on the policy approach on 'micro housing' in chapter 8.)

4.18.2 Another issue is how to manage a change of use from PBSA to other uses. Some other cities have started to see an over-supply of PBSAs and as a result increased change of use from PBSA to visitor accommodation. It is not necessarily the case that this will occur in Bath, but given the extent of housing need in the city it is considered appropriate to encourage a change of use to general housing rather than to visitor accommodation and to set criteria to assess such applications.

4.19 University of Bath

4.19.1 The Placemaking Plan Policy SB19 sets out key development principles for Claverton Campus and Sulis Club.

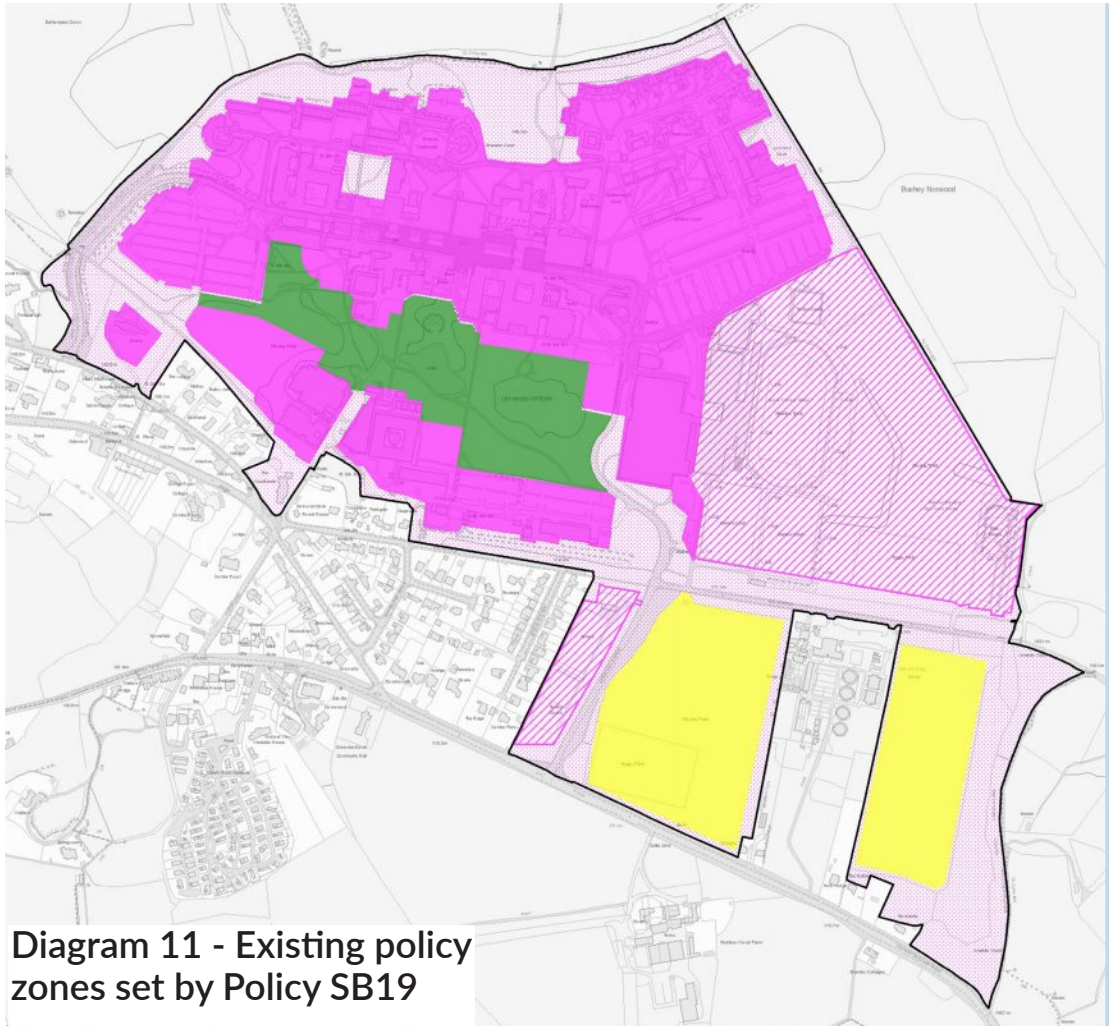


Diagram 11 - Existing policy zones set by Policy SB19

4.19.2 Diagram 11 shows the existing policy zones set by SB19:

- Purple Zones (with no hatching) - areas of pre-existing development where intensification and redevelopment is acceptable in

Diagram 12 - emerging Development Framework with potential development areas identified by the UoB.

principle

- Purple Zones (hatched) – largely sport related development, pitches, tennis courts and a car park within the Cotswold AONB where university related development is also acceptable in principle subject to a full and detailed environmental assessment
- Green Zones – central landscaped area which has an important green infrastructure function.
- Yellow Zones – areas within which proposals for development will be judged against national planning policy within the NPPF on AONB and Green Belt.

Diagram 13 - A Composite Masterplan prepared by the UoB

4.19.3 The Masterplan for Claverton Campus will set out a vision for the University's long term development and define key parameters in terms of:

- The location and scale of developments
- The nature of the supporting Infrastructure required
- The enhancement of its Green Infrastructure

4.19.4 The Masterplan is still at an options stage and is not endorsed by the Council. However it helps to understand the broad locations and subject to further assessment the potential capacity for new development on campus, thereby informing review of the policy requirements set by Policy SB19. Diagram 12 indicates the potential development areas and diagram

BTH7 Proposed policy approach for Bath University Claverton Campus

Maintain broadly the current policy approach to the Claverton Campus while indicating the location and scale of new development within the policy.

BTH8 Policy Options for Bath Spa University Newton Park Campus

1. Maintain the current policy approach to the Newton Park Campus that only allows for development on campus if it does not harm openness of the Green Belt or
2. Remove the campus from the Green Belt if 'exceptional circumstances' are demonstrated to facilitate development that would be subject to satisfactorily addressing heritage and environmental issues.

13 shows a composite Masterplan drawing that highlights the built development opportunities shown in the Development Framework in the context of the high level Access and Movement Strategy and Green Infrastructure Strategy.

4.19.5 The University is preparing detailed ecology, landscape, heritage and transport assessments of the campus.

4.19.6 Subject to the results of these assessments and agreement between the University, the Council and key stakeholders on the appropriate capacity of the campus, it is proposed that the key elements of the masterplan should be embedded in the site requirements within a reviewed campus policy.

4.20 Bath Spa University

4.20.1 Bath Spa University (BSU) is reviewing the future growth and management of its estate, potentially consolidating its estate and sites presence within the city. This includes a current presence on the Bath Community Academy Site in the south of the city (see Housing section above). Their growth

Diagram 14 - Newton Park Campus

plan shows a reduction of student numbers in the next few years followed by a steady increase. The university has indicated an increase of 100 students per annum from 2022/23 through to 2036. However as explained earlier, the Council considers that it is appropriate to plan for the first 10 years of the Plan period in the context of the current uncertainty in the Higher Education sector. Placemaking Plan Policy SB20 currently sets out the site specific requirements for BSU.

4.20.2 The University aspires to consolidate its existing estate and to focus on its Newton Park campus, which would encourage more sustainable patterns of transport i.e. walking between sites on campus rather than travelling across the city or District by car.

4.20.3 Consolidating their operations on Newton Park and a few other sites could allow the release of other university sites in the city over the Plan period for alternative uses such as employment and housing. Further work is needed in order to inform this strategy and the planning policy response to it, including whether the policy approach for the Newton Park campus would need to be reviewed. The campus currently lies within the Green Belt and is subject to heritage and ecological issues, including being within the setting of the World Heritage Site and a registered Historic Park & Garden. This means that limited infilling and redevelopment within the campus is only acceptable if it does not adversely affect the openness of the Green Belt. In order to remove the campus from the Green Belt 'exceptional circumstances' would need to be demonstrated. This would include a thorough assessment of all reasonable alternatives to meeting University development needs

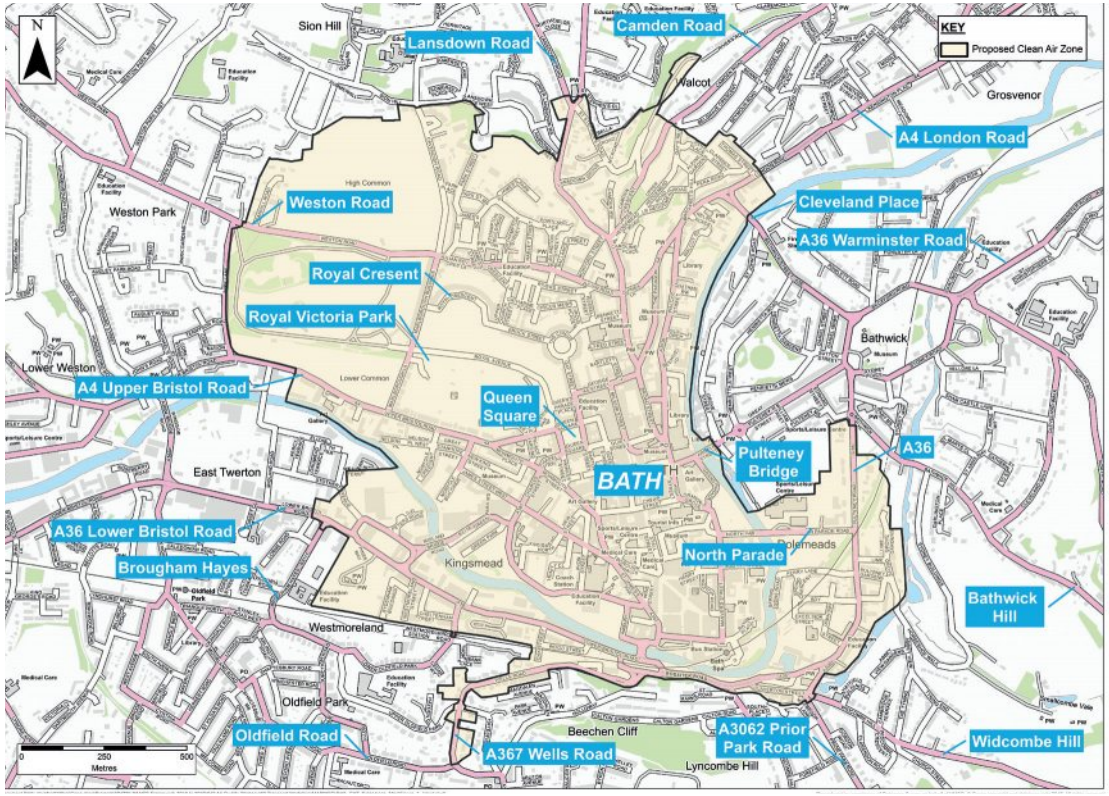


Diagram 15 - Proposed Clean Air Zone for Bath

outside the Green Belt, including brownfield sites within the city.

4.21 Transport in Bath

4.21.1 In order to make places more accessible and help create healthier environments for all, the Core Strategy and 'Getting Around Bath – A Transport Strategy for Bath' emphasise the need to reduce car dependency and promote sustainable modes of transport. This is also necessary in order to mitigate and manage the transport implications of accommodating additional economic growth and housing in the City, as well as improving air quality.

4.21.2 In order to reduce levels of NO2 to acceptable National and European limits by 2021, the Council is consulting on the introduction of a Clean Air Zone (CAZ) in the city, charging drivers of designated higher-emission vehicles to drive in a defined zone (see diagram 15). A range of other measures is also proposed that are designed to sit alongside a CAZ to encourage greener modes of travel, and lessen the impact of a charging zone on residents, businesses and the economy. The introduction of a CAZ and the complementary measures should reduce the number of vehicles entering the city centre.

4.21.3 Setting appropriate levels of parking also forms an important policy control on the volume of traffic generated by new development in the city, particularly those acting as trip attractors in order to discourage additional vehicle trips being made into the congested central area. The B&NES Parking Strategy supports this, with off-street public parking capacity in central areas held at the current level or below.

4.21.4 Traffic generation analysis explained in the Bath Transport Topic Paper concludes that the maximum parking standards for new development set by the Placemaking Plan help to ensure traffic growth will remain within acceptable thresholds in the weekday peak period in the central area of Bath and along the A4-A36 corridor. Restricting parking at the journey destination encourages a greater proportion of new development trips being made by bus, rail, cycling or walking. The strategy of limiting the increase in vehicular trips into central Bath also includes a programme of phased increases and improvements to Park and Ride

BTH9 Policy Options for Bath Park & Ride provision

1. Maintain the current criteria based policy and progress delivery of new Park & Ride development solely through submitting a planning application.
2. Identify specific land for Park and Ride development (expansion of existing sites at Lansdown & Odd Down and new provision East of Bath) and allocate in the Local Plan. This is also likely to require removing land from the Green Belt, but only if 'exceptional circumstances' exist (at Odd Down this could also encompass land for a household re-use & recycling facility – see Diagram 16)

provision.

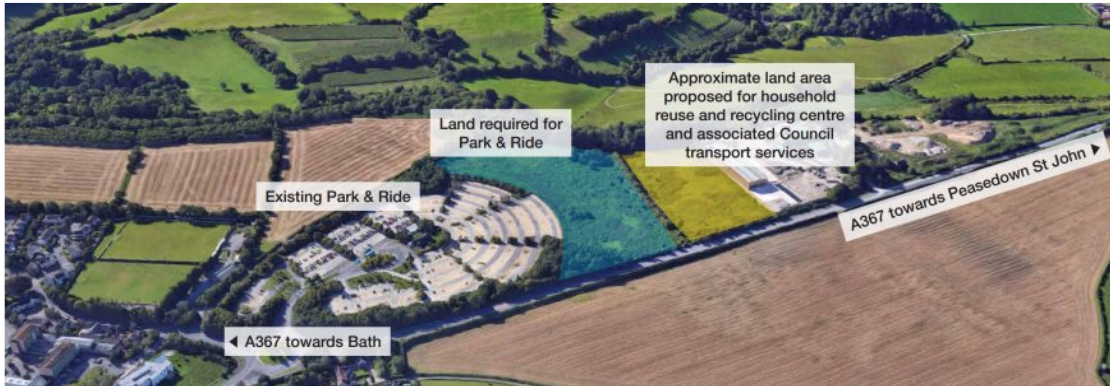
4.21.5 In the Local Plan it is proposed to retain the current policy approach included in the Joint Local Transport Plan and local strategies which facilitates delivery of improvements for walking, cycling and public transport infrastructure, that will enhance connectivity to and from areas of housing, employment and neighbourhood centres.

4.21.6 Options for reviewing the parking standards for residential, PBSA and HMOs are discussed in Chapter 8.

4.21.7 With regard to Park & Ride provision this requires further expansion of the existing Park & Ride facilities at Odd Down & Lansdown, plus new Park & Ride provision to the east of Bath. In planning for additional Park & Ride provision the impact of introducing the CAZ and an increased requirement for spaces will need to be taken into account. Adopted Placemaking Plan Policy ST6 sets out the criteria used to assess applications for Park and Ride development, both extensions to existing Park & Ride sites and new provision to the East of Bath. An independent review of potential sites for a Park and Ride facility to the east of the City was carried out in 2013. The Council has also consulted publically to help identify the most appropriate location. No final decision has been made on a preferred site and investigation of options is continuing. The general area under consideration is indicated on the Bath Spatial Strategy diagram 9 for reference.

4.21.8 Taking into account the important role of the Park and Ride sites in the strategy, the Council is considering two planning policy options (see BTH9), firstly to maintain the current criteria based policy approach or alternatively to seek to identify and allocate the site(s) through the Local Plan. In order to identify and allocate land in the Local Plan the impact of options would need to be thoroughly evaluated, particularly impacts on the Outstanding Universal Value of the World Heritage Site and its setting, the Cotswolds AONB and the Green Belt. Feasibility assessments to ensure that the provision of a Park and Ride site is deliverable in highways and road safety terms would also be necessary. Dependent upon the type of Park & Ride development proposed this is also likely to require removing

Diagram 16 - Potential Park and Ride expansion and household reuse and recycling centre relocation



land from the Green Belt, but only if 'exceptional circumstances' can be demonstrated.

4.22 Replacement Household Reuse and Recycling - for residents

4.22.1 The current public household recycling centre at Midland Road is an outdated facility that needs replacing to provide modern fit for purpose facilities that will improve customer experience and make reuse & recycling easier for residents. The Council is investigating the potential to relocate the household reuse and recycling element to land at Odd Down, to the south of the Park & Ride site. The land-take requirement is approximate at the moment, and a further need for accommodating ancillary Transport services within the same area of land at Odd Down, is also being investigated. Relocating the reuse and recycling facility to Odd Down would also facilitate release of the Midland Road site which can be brought forward for residential development, helping to meet the need for additional housing in the city. Vacating Midland Road also requires the relocation of the Waste and Recycling operations (domestic collections service and transfer station) and it is proposed that they are relocated to Pixash Lane in Keynsham.

4.22.2 The land lies within the Green Belt and more detailed assessment of environmental and traffic impact is necessary in order to ensure that a facility could be acceptably accommodated. Investigations undertaken so far suggest that the expansion of the Odd Down Park & Ride which is required to satisfactorily mitigate the impacts of development & traffic growth in the city (taking into account increased demand arising from the introduction of a Clean Air Zone) can also be accommodated in this location. Reconfiguration associated with provision of a replacement reuse and recycling facility could also enable provision of a new access into the Odd Down P&R site away from the existing roundabout therefore easing congestion at this junction. Environmental impacts requiring further assessment include effect on the landscape e.g. to the setting of the World Heritage Site and the Cotswolds AONB, as well as the need to ensure that it would not significantly harm bats roosting and foraging in the Bath & Bradford-on-Avon SAC. Subject to the results of this assessment and progression of the proposal through the planning process it would be anticipated that

BTH10 Options for the Replacement Household Reuse & Recycling Facility - for residents:

1. Seek to demonstrate 'exceptional circumstances' to remove land from the Green Belt at Odd Down and allocate for a waste facility in the Local Plan
2. Progress delivery solely through submitting a planning application for 'inappropriate development' in the Green Belt (which would need to be justified by 'very special circumstances')

a new facility would be operational in 2021/22.

4.22.3 The location being considered is illustrated in Diagram 16.

4.22.4 Progressing provision of the facility through the planning process could be done solely through submitting a planning application. A waste facility would represent 'inappropriate development' in the Green Belt and would therefore need to be justified by 'very special circumstances'. However, in order to help to facilitate its delivery and expedite the planning process with greater opportunity for public engagement it is an option for the Local Plan to identify and allocate the land for the provision of a household reuse and recycling facility. This would require the land to be removed from the Green Belt and national policy makes it clear that this can only be done if 'exceptional circumstances' exist. The 2018 NPPF outlines that 'exceptional circumstances' includes examining fully all other reasonable options to meet the need, including on brownfield sites.

4.22.5 Further work will be needed to address the issues above if the Council considers that it should seek to facilitate delivery of the facility through the Local Plan. Alternatively progressing the proposal through the planning system could be undertaken solely through submitting a planning application.

4.23 Historic and Natural Environment

4.23.1 All of the existing policies and associated guidance remain appropriate and valid. There is the opportunity to review their promotion, presentation and interrelationships and to consider how best to bring the different elements together within an adopted framework. The Council will also assess and identify gaps within the framework and the opportunities to prepare further guidance as resources permit.

4.23.2 Local Plan policies currently provide and should continue to provide a series of key design guidelines to inform and steer future development within the city. This is necessary in order to ensure that development proposals respond appropriately to the historic and natural environment context and local distinctiveness, including through consideration of location, scale, design, materials and details. New development should add to the sense of place and respect and display a positive relationship with heritage assets and their setting. Further consideration will be given to which elements of the policy framework could be enhanced by the preparation and adoption of Supplementary Planning Documents and how this can best be achieved.

4.24 Review of existing policies for Bath

4.24.1 The table below sets out all Bath policies in the Core Strategy and Placemaking Plan, indicating in bold which policies are subject to review in this document and the proposed approach for the remaining policies. Where there is no change in circumstances to warrant significant policy review, it is proposed to take

BTH11 Review of existing Bath Policies

Please make sure you specify which site you are commenting on when responding.

the policies listed forward - some with amendments for the purposes of clarification (in the light of best practice, updated guidance etc.) as indicated below. The policies will be presented in full in the Draft Local Plan and are also likely to be renumbered at that stage.

Policy B1 Bath Spatial Strategy

Proposed approach: The approach is still effective but it needs to be updated taking into account the latest evidence and trends.

Revised approach is discussed on page 33.

BD1 Bath Design Policy

Proposed approach: No amendments currently proposed - policy remains relevant and fit for purpose.

B2 Central Area Strategic Policy

Proposed approach: The approach is still effective but it needs to be updated taking into account the latest evidence and trends.

Revised approach is discussed on page 33.

SB1 Cattlemarket Site

Proposed approach: No amendments currently proposed - policy remains relevant and fit for purpose.

SB2 Central Riverside & Recreation Ground

Proposed approach: No amendments currently proposed - policy remains relevant and fit for purpose.

SB3 Manvers Street

Proposed approach: The Police Station was bought by Bath University and a change of use was permitted from Police Station (sui generis) to mixed office use (Use Class B1) and Non-Residential Education use (Use Class D1) in June 2015. Therefore the quantum of new development to be accommodated on this site needs to be reviewed.

SB4 Bath Quays North and Bath College

Proposed approach: Outline planning application for comprehensive mixed use redevelopment was permitted subject to s.106 agreement in August 2018.

It is considered that the policy remains relevant and fit for purpose to guide all reserved matters.

SB5 South Quays & Riverside Court

Proposed approach: Riverside Court site: Prior approval request for change of use of the upper two floors in each building from offices (Use Class B1a) to dwelling houses (Use Class C3) (27no. flats) was approved in February 2018. Therefore the quantum of office floorspace and residential development needs to be reviewed once the permission is implemented.

SB6 South Bank

Proposed approach: No amendments currently proposed - policy remains relevant and fit for purpose.

SB7A Green Park Station West
SB7B Sydenham Park

Proposed approach: Pinesgate: Erection of an office building (Use Class B1) totalling 15,348sqm GIA, and a purpose-built educational campus, comprising academic accommodation (Use Class D1) and integral student accommodation (Use Class C2) of 16,491sqm was permitted in May 2016.

Homebase store is due to close in November 2018. Further engagement with key landowners is necessary to ensure the Policy provides an effective framework. The policy requirements also need to be reviewed in light of the sequential approach to town centre uses and updated evidence on hotel demand and development in the pipeline set out in the Updated Visitor Accommodation Study.

SB8 Western Riverside

Proposed approach: 722 homes completed 52 under construction (towers) at 31/3/18. 17/02479/ERES regarding plot B40 (52 flats) was approved in October 2017 for the last parcel of land within stage 1 of the outline permission site.
The Midland Road Waste Recycling Centre needs to be relocated in order to facilitate expected housing and also to improve the waste facilities/services for Bath residents. See Section 4.22 relating to potential relocation to land at Odd Down.

B3 Twerton and Newbridge Riverside

Proposed approach: Twerton Riverside – Strengthen the protection of the employment uses.

Revised approach is discussed on page 34 and 35.

SB9 the Bath Press

Proposed approach: Approval of reserved matters with regard to outline application 06/01733/EOUT for the erection of 97 residential dwellings (blocks B5 and B16), 750m2 of ground floor commercial uses was permitted in December 2014. Development scheme is under construction, however it is proposed to retain this policy until development of the site is successfully completed.

SB10 Roseberry Place

Proposed approach: Mixed-use regeneration comprising the erection of six buildings to accommodate up to 175 flats, flexible business employment floorspace (Use Class B1) (up to 4,500 sq m gross), local needs shopping (up to 1,350 sq m gross) together with all associated development was permitted in Aug 2016.

It is under construction, however it is proposed to retain this policy until the site is successfully completed.

SB11 Former MoD Foxhill /Mulberry Park

Proposed approach: Outline Planning Permission for up to 700 dwellings,

up to 500 sqm retail (Use Class A1, A2, A3, A4, A5) up to 1,000sqm employment (Use Class B1), up to 3,500 sqm community/education (Use Class D1), single form entry primary school, open space and all associated infrastructure was granted in March 2015. 15/02465/RES permitted in Oct 2015. 16/03320/RES permitted in Oct 2016.

No amendments currently proposed - policy remains relevant and fit for purpose.

SB12 Former MoD Warminster Road

Proposed approach: 14/02272/EFUL Demolition of existing buildings, erection of 204 no. dwellings was permitted in March 2015. 16/04289/EFUL - Erection of 6 no. apartment blocks to provide 87 no. new dwellings (Partial revision of application 14/02272/EFUL). No amendments currently proposed - policy remains relevant and fit for purpose.

SB13 Former MoD Ensleigh & Royal High Playing Field

Proposed approach: 314 dwellings and 72 extra care units permitted. 134 dwellings completed at end of March 2018. Planning permission also granted for a 210 place primary school which has now been constructed. The policy remains relevant and fit for purpose with the intention to retain it until development has been completed to ensure adherence to the placemaking principles.

SB14 Twerton Park

Proposed approach: The partial redevelopment of the land is still possible. Therefore the development principles need to be reviewed to inform the draft Plan.

SB15 Hartwells Garage

Proposed approach: No amendments currently proposed - policy remains relevant and fit for purpose.

SB16 Burlington Street

Proposed approach: The current allocation allows student accommodation. The development principles need to be reviewed.

SB17 South of Englishcombe Lane

Proposed approach: 18/01516/REG04 -Pending decision for development of 37 residential dwellings including affordable housing. However, potentially the housing capacity needs to be reduced due to ecology issues (the whole site is within a site of nature conservation interest.

SB18 Royal United Hospital

Proposed approach: No amendments currently proposed - policy remains relevant and fit for purpose.

Policy B5 Strategic Policy for Bath's Universities

Proposed approach: Potentially need to be updated. Revised approach is discussed above.

Policy SB19 the University of Bath at Claverton Down and the Sulis Club

Proposed approach: The University of Bath has published their growth plan

and is progressing the preparation of Masterplan. Revised approach is discussed on page 43.

Policy SB20 Bath Spa University, Newton Park Campus

Proposed approach: Bath Spa University has published their growth plan and reviewing their estate plan. Revised approach is discussed on page 46.

Policy B3a Land adjoining Odd Down Bath Strategic Site

Proposed approach: Further transport assessment needed in respect of transport impacts/access arrangements to deliver total of 300 dwellings.

5. Keynsham

5.1 Context

5.1.1 The market town of Keynsham occupies a strategic location between Bath and Bristol in the north of the District with a population of around 15,500 and is linked to the two cities by the A4 and the mainline railway. The physical geography is influenced by the two rivers that traverse the area, the Avon and the Chew, which converge to the north of the town at Somerdale. Keynsham has a rich history. In Roman times the settlement was known as Trajectus and by the medieval period had evolved into a successful town, dominated by the Abbey. Up until the 18th century Keynsham remained a relatively small place, focused around the linear High Street, but over the last century has expanded rapidly. A large proportion of the growth occurred in the 1950s and 1960s when the town greatly increased in size. Keynsham remained a comparable size until the last decade, when the town has started to grow again.

5.1.2 The existing strategy seeks to enable Keynsham to evolve into a market town fit for the 21st century, becoming a more significant location for business and a more sustainable, desirable and well-connected place to live and work. The existing strategy has allowed changes to be made to the Green Belt boundary surrounding Keynsham to accommodate both employment floorspace and housing, but maintained the key Green Belt purpose of preventing the town from merging with Bristol and Saltford, and helping to preserve its individual character, identity and setting. Attracting more Higher Value Added jobs is a priority of the existing strategy, aiming to reduce out commuting by groups such as professional workers, managers, senior officials and administrative workers, allowing better opportunities to live and work in the town. The important role of the town centre and Somerdale as the main focus for business activity is complemented by the Broadmead/ Ashmead/Pixash Industrial Estate area.

5.1.3 The new Local Plan proposes an evolution of the existing spatial strategy. The fundamental priorities are still broadly appropriate, but the town will continue to grow in size and importance with the introduction of the North Keynsham Strategic Development Location (SDL) through the West of England Joint Spatial Plan. This new expansion of the town will deliver around 1,500 new homes, 50,000 sqm of employment floorspace, a new local centre and a new primary school, with potential for a new mixed tenure marina. This requires the completion of key transport infrastructure and a development that is of a high quality of design that contributes positively to local character and distinctiveness. This new development has the potential to enrich Keynsham and its connections and be a wider catalyst for change for the town.

5.1.4 In this chapter, the **Strategy and Policy review** in section 5.2 sets out the topic based current policy framework, key changes since 2011 and key challenges. These key challenges identified will inform **the Priorities** in section 5.11. The chapter also includes the **Suggested Policy Approach** to be taken in the Local Plan, or where there are still potential options **Strategy Policy Options**.

5.2 Strategy, Evidence & Policy Review

5.2.1 The Core Strategy identified strategic issues and opportunities / objectives for Keynsham, including those set out below:

5.3 Strategic Issues

- Job losses following closure of Cadbury's at Somerdale
- Affordable housing shortage
- Ageing population
- Traffic congestion
- Limited public transport
- Lack of allotments
- Insufficient emphasis given to protecting Keynsham's heritage
- Town 'coasting' since the 1970's, with little development or investment, resulting in Keynsham losing ground economically to neighbouring areas in Bristol
- Poor overall image of town, mainly due to declining town centre which is in need of revitalisation
- Strong element of out-commuting, significantly in professional workers, managers, senior officials and administrative workers

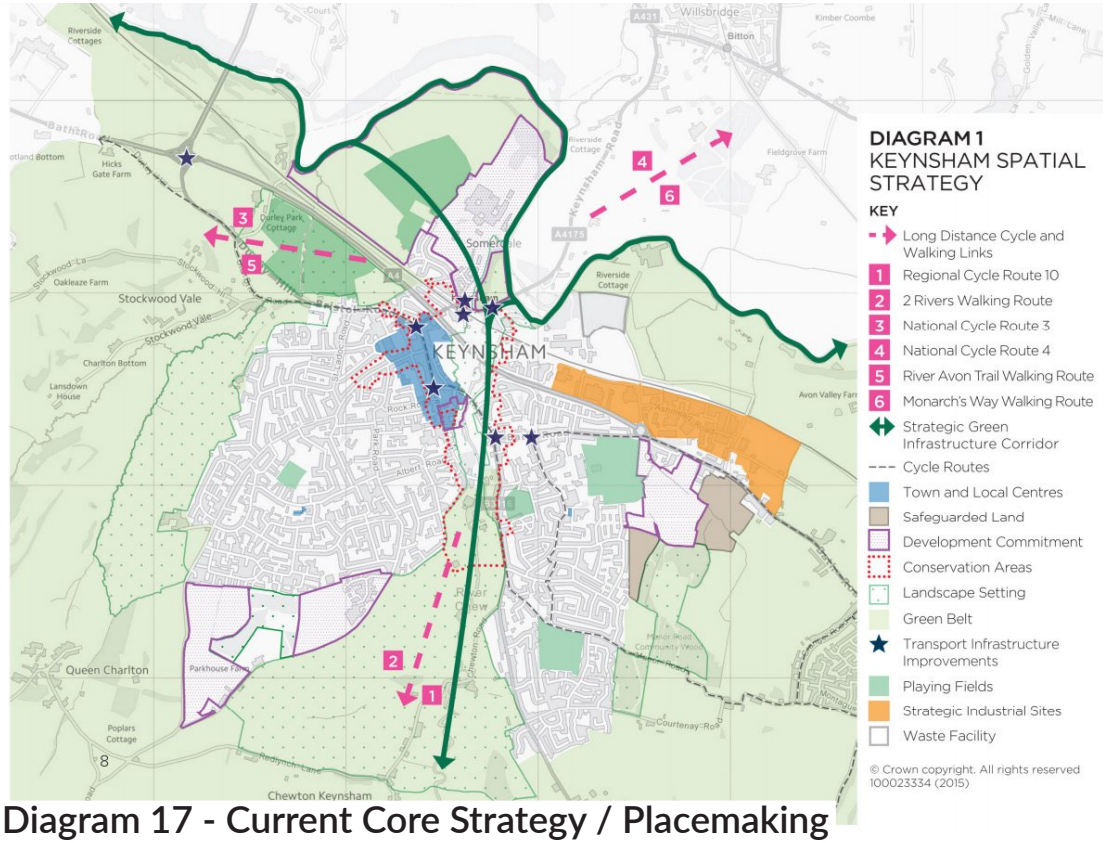


Diagram 17 - Current Core Strategy / Placemaking Plan Spatial Strategy Diagram

5.4 Strategic Opportunities and Objectives

- Embrace the future, developing Keynsham into a thriving, sustainable and safe 21st century market town
- Capitalise on Keynsham's strategic location between Bristol and Bath, with the town

becoming a more sustainable, desirable and well-connected place to live and work
- Enhance the town's considerable assets and unique identity with physical development
- Improve the economy and create new jobs through development, including a focus on regenerating the Town Centre and Somerdale, with Keynsham becoming a more significant location for business
- Remain a proud and independent settlement
- Promote a sense of well-being and community for all, generating pride in the town
- Improve the Memorial Park

5.4.1 The Vision for Keynsham forms the foundation of the Core Strategy and Placemaking Plan (PMP). It was created to describe the kind of place that Keynsham should become, how much change is needed physically, economically and socially, with realistic objectives for development. The vision is being tested through the formulation of the new Local Plan, and will evolve from its current incarnation. There is potential for the new Local Plan and the new Neighbourhood Plan to contain a shared vision.

Current Vision for Keynsham

Keynsham is a historic town that occupies a strategically important location between Bristol and Bath and is therefore well placed to improve and attract investment. It will continue to act as a market town and service centre for the surrounding area. In responding to the loss of a major employer, it will evolve as a more significant business location. Keynsham will expand to accommodate a growing population, ensuring it retains its independence and its separate identity within an attractive rural setting. It will become a more sustainable, desirable and well connected place in which to live and work, with an enhanced town centre inspired by its heritage, cherished rivers, park and green spaces.

5.4.2 The subsequent spatial strategy for Keynsham set out in Policy KE1 aimed to deliver the vision for Keynsham and the identified strategic opportunities & objectives. This allowed for changes to be made to the Green Belt boundary surrounding Keynsham to accommodate both employment floorspace and housing, but maintaining the key Green Belt purposes of preventing the town from merging with Bristol and Saltford, and helping to preserve its individual character, identity and setting. In summary, the strategy for the town as set out in Policy KE1 is to:

- Maintain the Green Belt surrounding Keynsham, but allowing releases of Green Belt land to the east and south west to accommodate employment and housing growth
- Make better use of the existing green and blue infrastructure running through and surrounding the town
- Make provision for around 2,150 new homes (net) and

around 1,600 additional jobs (net) between 2011 and 2029
- Enable development which supports the town to continue to function as an independent market town, with the scale and mix of development helping to increase self-containment and help to develop the town as a more significant business location
- Retain and extend the Broadmead / Ashmead / Pixash Industrial Estates as an area for business activity, complementing the role of the town centre
- Provide larger retail units in the town centre to attract a more varied mix of retailers
- Retain and encourage enhancement of Queens Road and Chandag Road as local centres
- Provide for improvements to public transport and enhance connectivity between walking, cycling and public transport routes
- Implement a reviewed parking strategy
- Enable renewable energy generation opportunities, including a new district heating network within Keynsham

5.4.3 Policy KE2 encompasses the historic core of the town centred on the High Street, the Memorial Park, the Civic Centre, Riverside, train station and Somerdale. Change within this policy area seeks to improve the performance and profile of the town and is focused around establishing an integrated and sustainable town centre and regenerating Somerdale.

5.4.4 Since the Core Strategy was adopted in 2014, the Council has been monitoring its implementation and updating the evidence base. The analysis below summarises the existing strategy/policy approach and key changes that have happened which helps to identify the key issues that the new Local Plan should address.

5.5 Housing Provision

5.5.1 The Current Policy entails:

- Make provision for around 2,150 new homes (net) between 2011 and 2029
- 700 of which to be located within the Town Centre / Somerdale policy area
- Include affordable housing and an appropriate housing mix giving more choice of housing to meet the needs of the local community

5.5.2 Changes since 2011:

- At 1st April 2018 a total of 1,111 new homes (net) have been completed
- At 1st April 2018 an additional 1,010 new homes have planning permission
- In total, 2,121 dwellings have therefore been completed or have permission, and the current housing policy is proving to be effective and delivery is happening as expected.

5.5.3 Key challenges

- Make further provision for housing development at the North Keynsham Strategic Development Location (SDL)

as identified in the West of England Joint Spatial Plan

5.6 Employment space and jobs

5.6.1 The Current Policy entails:

- Make provision for around 1,600 additional jobs (net) between 2011 and 2029
- Make provision for a change in office floorspace from around 13,000sqm in 2011 to about 20,200sqm in 2029 (net increase of 7,200sqm)
- Make provision for a change in industrial/warehouse floorspace from around 52,000sqm in 2011 to about 60,300sqm in 2029 (net increase of 8,300sqm)
- As part of this overall requirement, deliver a new mixed-use quarter at Somerdale to provide significant employment floorspace, and the redevelopment of Riverside for a mix of uses
- Diversification of the employment base in order to offer greater opportunities for the resident population, including a focus on attracting more Higher Value Added jobs to help reduce out-commuting

5.6.2 Changes since 2011:

- At 2016 a net increase of around 300 net additional jobs had been created
- Of the top five employment sectors in 2011, all experienced growth throughout this period except for the education sector
- At 1st April 2018 a total increase of 15,000sqm of B1 floorspace has been completed, mainly as the result of the completion of the office development at the Chocolate Quarter at Somerdale (now occupied by companies such as Pukka Herbs and Independent Vetcare, as well as St Augustine's GP Surgery) and the completion of the Civic Centre
- At 1st April 2018 a total loss of 2,327sqm of B2/B8 floorspace has occured, mainly as a result of the demolition of an industrial unit at Ashmead to build a custody and criminal investigation centre for Avon and Somerset Police

5.6.3 Key challenges:

- Deliver the Core Strategy Employment land allocation at East Keynsham as part of the North Keynsham SDL
- Make further provision for employment development at the North Keynsham Strategic Development Location (SDL) as identified in the West of England Joint Spatial Plan
- Ensuring the delivery of the employment objectives of the Economic Strategy review are achieved where possible, including delivering more Higher Value Added jobs.

5.7 Retail and Town Centre

5.7.1 The Current Policy entails:

- Enable development which supports the town to continue to function as an independent market town

- Provide larger retail units in the town centre to attract a more varied mix of retailers
- Retain and encourage enhancement of the local centres
- Enhance the town centre to make it a more vibrant and attractive area, enabling all members of the community to enjoy it over a longer period of the day

5.7.2 Changes since 2011:

- The 2018 Retail Study update shows that Keynsham has maintained its place in the sub-regional rankings of town centres, comparable with centres such as Frome and Wells
- At 1st April 2018 a total increase of around 650sqm of retail floorspace has been built, mainly as a result of the completion of the Civic Centre scheme within the Town Centre which has delivered new, modern retail units
- The town centre now has a slightly higher percentage of convenience floorspace than the national average, but a slightly lower amount of comparison floorspace.
- The amount of vacant units (10%) is comparable, but slightly lower, than the national average of 11%
- Despite the opening of Sainsbury's in the Civic Centre and the good range of food retail in the town the 2018 Retail Study update identifies that the convenience goods sector in Keynsham appears to have lost market share between 2014 and 2018 (with increasing use of stores in east Bristol including both the Sainsbury's at Emersons Green and the ASDA at Longwell Green).
- The 2018 Retail Study identifies a number of retailer requirements for floorspace within Keynsham, but that overall there is no forecast quantitative capacity for additional retail floorspace
- The quality of the convenience stores in Keynsham is not in doubt and instead the leakage of convenience goods trips is influenced by the close proximity of Bath and Bristol and the opportunities of combining grocery shopping with commuting and other shopping trips
- The range of comparison goods retailers is considered to be good
- Completion of the one-way trial of Keynsham High Street has resulted in an overall reduction of through traffic on the High Street and better air quality (reductions of 22-47% in particulates),
- The identification of North Keynsham as a Strategic Development Location and the requirement within the JSP Policy 7.1 to provide a new Local Centre to serve the new community; the 2018 Retail Study recommends a modest sized convenience store alongside a limited number of other retail units

5.7.3 Key challenges:

- Clawing back some of the leakage in expenditure in convenience goods would

benefit the town; the challenge will be how to do this when there is no identified qualitative deficiency with the existing stores.

- The challenge for comparison goods shops will be how to retain existing retailers at a time when national multiple retailers are generally reducing the number of outlets and concentrating upon large settlements
- The need to concentrate on qualitative improvements to the Town Centre and increasing its wider attractiveness to people is still important (e.g. environmental/public realm enhancement)
- Additionally, the 2018 Retail Study recommends concentrating on encouraging niche goods sectors within Keynsham (i.e. providing something different to the larger centres)
- Integration of the North Keynsham SDL that is connected to, and therefore benefits, the Town Centre
- Make appropriate provision for a new Local Centre at the North Keynsham Strategic Development Location (SDL) as identified in the West of England Joint Spatial Plan, including a modest convenience store that complements but does not compete with the nearby Waitrose store and Town Centre
- Ensure that no other retail floorspace is provided around or near to the Waitrose store (i.e. between the A4 and railway line) in order to provide the best possible conditions for the new Local Centre
- Deliver Town Centre public realm enhancement scheme which will seek to deliver qualitative improvements to the High Street, enabling a town centre for Keynsham that is lively, safe, sustainable and healthy and an enhanced retail environment

5.8 Transport

5.8.1 The Current Policy entails:

- Improve the management of traffic through the town centre and enhance public transport provision
- Enhance connectivity between walking, cycling and public transport routes
- Implement a reviewed parking strategy

5.8.2 Changes since 2011:

- Keynsham Transport Strategy published, with priorities identified to mitigate negative impacts of congestion
- High Street one way trial implemented
- Junction improvements completed, including at Bath Road/Chandag Road, Keynsham Road/Somerdale entrance, Charlton Road/Tesco entrance, Charlton Road/Bilbie Green entrance
- Keynsham Railway Station improvements completed; track lowered in advance of electrification works / MetroWest service upgrade
- Pedestrian/cycle infrastructure improvements completed,

including on the High Street and at Somerdale
- Joint Transport Study completed at West of England level; Options Assessment Reports published to define objectives and identify and assess potential interventions to enable the additional strategic growth proposed through the West of England Joint Spatial Plan

5.8.3 Key challenges:

- Transport is fundamental to the successful economy and wellbeing of Keynsham, its residents and employees. Traffic congestion is causing delays, both within the town and on the A4, affecting the quality of life for residents and making the town centre a less attractive place to visit. Traffic travelling through the town to wider destinations exacerbates these problems, which without mitigation measures will worsen with further development in the town
- Delivering key transport infrastructure to enable and support growth is therefore a priority in order to avoid/ mitigate severe impacts on the road network – this includes individual schemes as set out in the Keynsham Transport Strategy, Joint Transport Study and Options Assessment Reports
- Opportunities to promote walking, cycling and public transport will also be a priority, including provision of high quality walking and cycling networks and supporting facilities
- Emphasis on design - ensuring that patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places

5.9 Visitor Accommodation

5.9.1 The Current Policy entails:

- No specific policy on visitor accommodation

5.9.2 Changes since 2011:

- Keynsham currently only has two small hotels - the 3-star Old Manor House Hotel (10 bedrooms) and 2-star Grange Hotel (13 bedrooms – although this has now received planning permission to convert to residential). Grasmere Court is also a sizeable 4-star guest house in the town with 19 bedrooms.

5.9.3 Key challenges:

- The Visitor Accommodation Study highlights that the economic growth planned for Keynsham (and partly delivered through schemes such as Somerdale) could generate increased corporate demand for hotel accommodation in Keynsham, depending on the types of companies that are attracted and how quickly
- The SDL at North Keynsham is highlighted as having the potential to meet this demand through a small budget hotel (which would require a visible

location). The recommendation is that the SDL also includes leisure uses that an associated hotel might complement
- However, the Visitor Accommodation Study is cautious about the case for any allocations within the Local Plan including the town centre

5.10 Historic Environment

5.10.1 The Current Policy entails:

- Reinforce and enhance the historic character and qualities of the Conservation Area ensuring local character is strengthened by change. The linear pattern and fine grain of the High Street should be maintained and enhanced.
- Improve the quality of the public realm including provision of a new civic space

5.10.2 Changes since 2011:

- Completion of Conservation Area Appraisal and Management Plan in 2016
- Completion of Shop Front and Façade Study (joint project with Historic England and Keynsham Town Council) in 2017
- Completion of new Civic Space (Market Walk) as part of the Civic Centre development

5.10.3 Key challenges:

- Deliver Town Centre public realm enhancement scheme which will seek to deliver qualitative improvements to the High Street, and enhances the Conservation Area.
- Continue to work with Historic England and Keynsham Town Council to progress detailed design guidance alongside a funding and delivery plan to improve shop fronts and building facades and incorporate into the Neighbourhood Plan as appropriate

5.11 Spatial Priorities for Keynsham

5.11.1 Key priorities underpinning the Local Plan are suggested to include:

- Continue to develop Keynsham into a thriving, sustainable and safe 21st century market town, building on the achievements since 2011;
- Capitalise on Keynsham's strategic location between Bristol and Bath, with the town becoming a more sustainable, desirable and well-connected place to live and work;
- Deliver key infrastructure to enable and support growth including strategic transport infrastructure and improvements within the town, including those set out in the Keynsham Transport Strategy, Joint Transport Study and Options Assessment Reports;
- Successfully incorporate the North Keynsham Strategic Development Location as part of Keynsham and ensure that it is an exemplar new garden community of high design quality;
- Enhance the town's considerable assets and unique identity with physical

development;

- Improve the economy and create new Higher Value Added jobs through development, with Keynsham becoming a more significant location for business within the West of England which delivers a more diverse employment base;
- Deliver qualitative improvements to the Town Centre (including the main shopping streets, the Memorial Park and clearer and better quality routes between them) with a focus on improving its environmental quality, image and the overall experience of people who live, work and visit;
- As part of this strategy for the Town Centre, seek to accommodate more diverse retailers to differentiate the Town Centre from nearby competitors, complemented by a greater focus on leisure, food outlets and the accommodation of events to provide a more distinctive retail offer and experience;
- Remain a proud and independent settlement, utilising the Green Belt to ensure physical separation from Bristol and Saltford;
- Conserve and where possible enhance the landscape setting and natural environment of the town, focusing on the river valleys and community woodland;
- Promote a sense of well-being and community for all, generating pride in the town and a healthy community.

5.12 Strategy and Policy Approach Options

5.12.1 The spatial vision will propose the key aims and ideas that will guide the evolution of Keynsham over the coming years. It will be informed by an analysis of the characteristics of the town, the challenges it faces and the priorities of the Local Authority and stakeholders. There is the possibility of developing a shared vision with the Neighbourhood

KSM1 Keynsham Spatial Strategy Proposed Policy Approach

1. Update Policy KE1 to include revised housing and employment objectives, and incorporation of key priorities identified above.
2. Update Policy KE2 to emphasise approach on delivering qualitative improvements to the Town Centre.
3. Create a new Policy to allocate the North Keynsham Strategic Development Location for mixed use development, including a red line boundary, concept diagram and key development requirements / placemaking principles. Identify a new Local Centre at North Keynsham in the hierarchy of centres within the Local Plan.
4. Update the Keynsham Spatial Strategy Diagram accordingly.
5. Update key infrastructure requirements.
6. Consider delegation of some matters of local detail to the Keynsham Neighbourhood Plan.

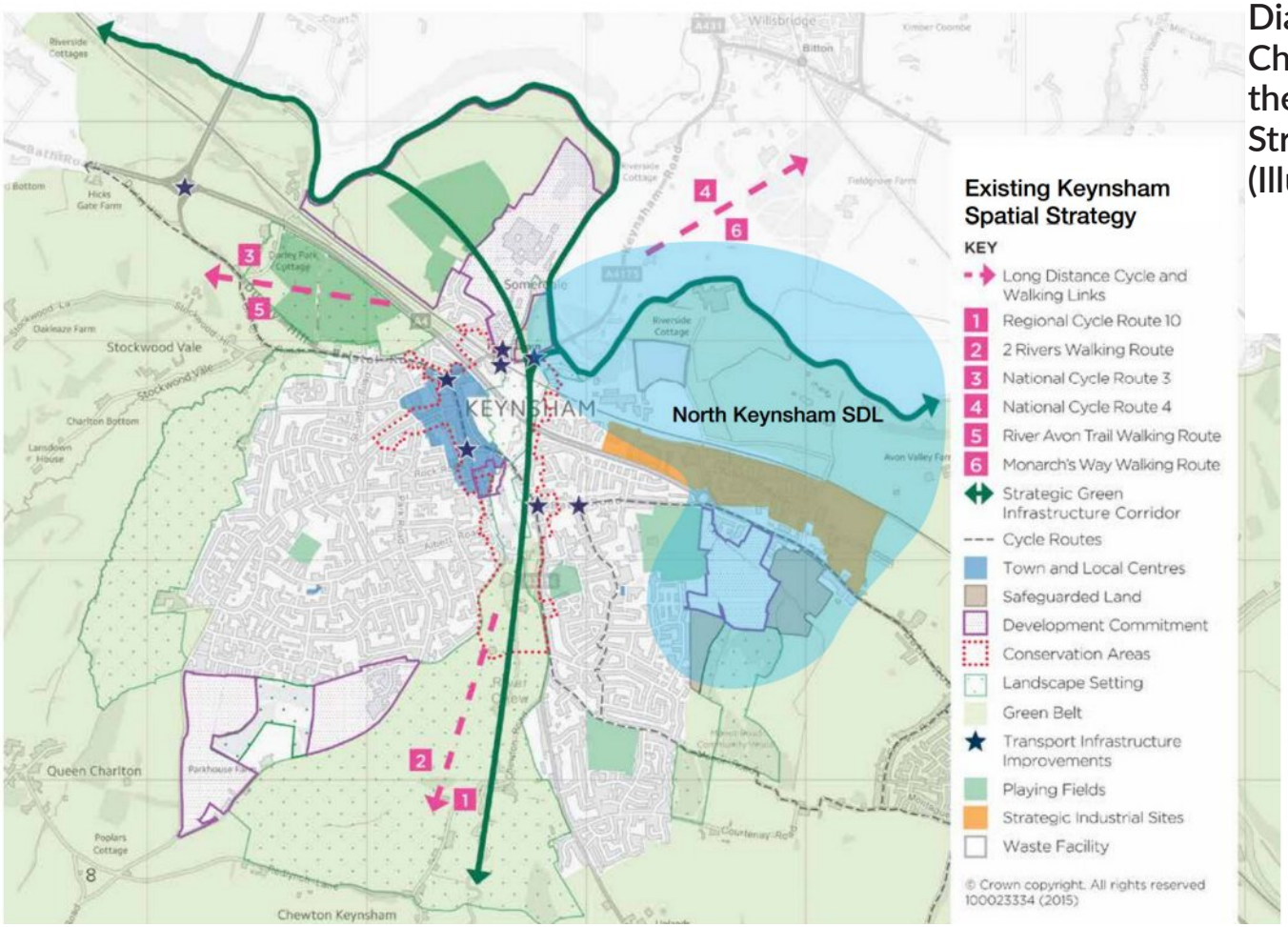


Diagram 18 - Changes Proposed to the Keynsham Spatial Strategy Diagram (Illustrative)

Plan which is being formulated concurrently with the Local Plan by the Town Council and their Neighbourhood Development Plan community groups. As part of this, some detailed policy issues more suited to a Neighbourhood Plan (e.g. local design issues) could be addressed in the Neighbourhood Plan.

5.12.2 The current spatial strategy as articulated in the Core Strategy / PMP continues to be generally appropriate. However, the inclusion of the North Keynsham SDL and the

strategic infrastructure required to deliver it is a major change which the spatial strategy (and vision) needs to take account of. As set out in KSM1, other changes may be required to take into account the key priorities articulated above.

5.13 Review of existing policies for Keynsham

KSM2 Review of existing policies for Keynsham

Please make sure you specify which site you are commenting on when responding.

KE2a Somerdale

Proposed approach: site is currently being delivered. Policy remains relevant and fit for purpose, but will need updating to reflect the dwellings already completed.

KE2b Riverside and Fire Station

Proposed approach: Redevelopment / refurbishment of the Riverside / Leisure Centre site has commenced. Amendments required reflecting the decision to refurbish and extend the Riverside building rather than demolish and redevelop the site. Further consideration of the Fire Station site is required in the policy as a result of this.

KE3a Land adjoining East Keynsham Strategic Site Allocation

Proposed approach: The site has achieved planning permission (18/01307/RES and 18/01308/FUL) and work has now commenced on site for a total of 261 dwellings. The policy remains relevant and fit for purpose with the intention to retain it until development has been completed to ensure adherence to the placemaking principles.

KE3b Safeguarded Land at East Keynsham

Proposed approach: This policy is proposed to be deleted as the two safeguarded sites are proposed to be included within a new site allocation policy for the North Keynsham Strategic Development Location.

KE4 Land adjoining South West Keynsham Strategic Site Allocation

Proposed approach: The site has achieved planning permission (15/04290/FUL and 16/02077/FUL) and work has now commenced on site for a total of 200 dwellings. The policy remains relevant and fit for purpose with the intention to retain it until development has been completed to ensure adherence to the placemaking principles.

K2 South West Keynsham Saved Local Plan Policy

Proposed approach: Development on these two sites is substantially complete. Policy is proposed to continue to be saved until final completion of all required development.

Infrastructure Table 1: Summary of Key Infrastructure in Keynsham

Proposed approach: Table to be updated to reflect the latest Infrastructure Delivery Plan and the strategic infrastructure required to enable and deliver the North

Keynsham Strategic Development Location.

5.14 North Keynsham Strategic Development Location (SDL)

5.14.1 The site is identified within the West of England Joint Spatial Plan as a Strategic Development Location, one which is capable of delivering large scale development which supports the spatial strategy in a sustainable way. Policy 5 of the Joint Spatial Plan outlines key place shaping principles that should be used to inform the development and delivery of high quality and sustainable places. Policy 7.1 sets out the bespoke requirements for the site. These policies form the starting point for detailed assessment of the North Keynsham SDL and allocation within the Local Plan.

5.14.2 The site lies to the north-east of Keynsham, between the town and the River Avon, and also includes the land at East Keynsham that was safeguarded for future development in the Core Strategy. The majority of the site is currently within the Green Belt. The western end of the site lies within 500m of the train station and extends for 2km eastwards towards Saltford. It lies close to the urban fringe of the town but the main part of the site is isolated due to severance caused by the railway line. The site is largely level, sloping downwards to the floodplain and river. It is largely undeveloped but includes a range of uses such as Broadmead Lane Industrial Estate, Wessex Water Sewage Treatment Works and Avon Valley Wildlife and Adventure Park. The site lies in close proximity to the A4 providing direct access to Bath and Bristol by car and public transport, and close to the Bristol and Bath cycle path to the east.

5.14.3 In summary the Joint Spatial Plan requires the development at North Keynsham of 1,500 new homes (1,400 within the Plan period) including affordable housing provision, 50,000sqm of employment floorspace (which could provide

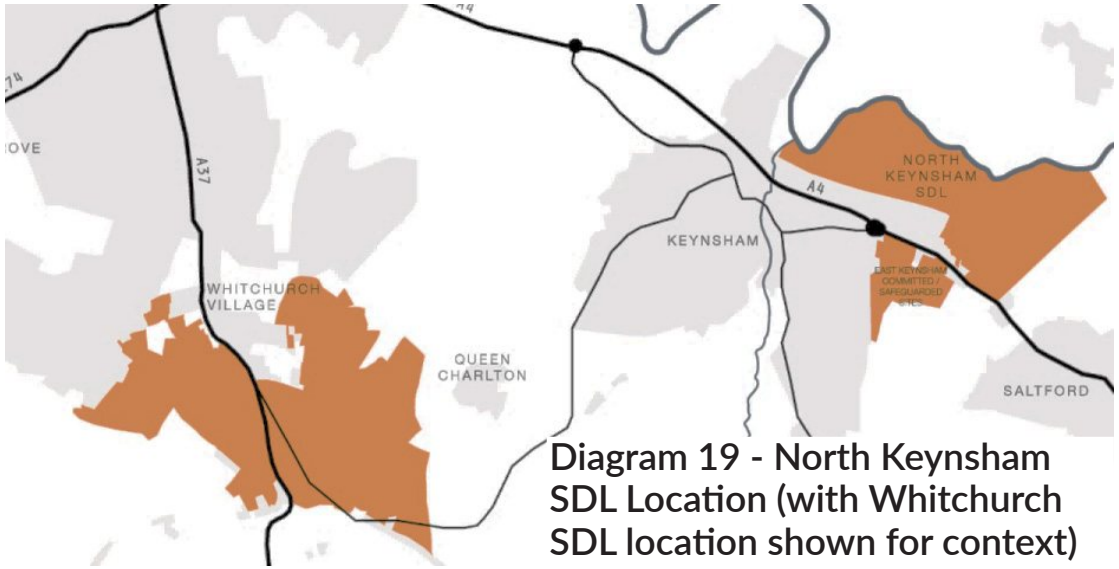


Diagram 19 - North Keynsham SDL Location (with Whitchurch SDL location shown for context)

around 1,600 jobs), a new school, local centre and potential for a new marina. The development will require the completion of key transport infrastructure before new homes are completed including the North Keynsham multi modal link road from Avon Mill Lane to the A4, Keynsham rail station improvements and a Metrobus (high quality public transport) route from Bristol to Keynsham on the A4 corridor. Other transport requirements include pedestrian and cycle connections (including to the Bristol to Bath cycle path), a high frequency local bus service through the site and off site junction improvements.

5.14.4 The development is also required to incorporate a layout and form that produces a high quality of design, contributes positively to local character and distinctiveness, and that mitigates impact on sensitive views (including from the Cotswolds Area of Outstanding Natural Beauty). This should incorporate a well-integrated, multifunctional green infrastructure network.

5.15 North Keynsham Strategic Planning Framework

5.15.1 A Strategic Planning Framework was produced by Arup in 2017 for the North Keynsham site on behalf of the Council. The framework demonstrates an urban extension which responds to the strong landscape setting. The development includes residential-led development of apartments and family housing focused around a new marina with supporting neighbourhood centre and primary school. Mixed employment development is included at the western end of the site with extensive green infrastructure across the site. The scope of the framework is a layout for the site itself with consideration given to the off-site improvements required.

5.15.2 Taking into account the site context, a maximum development envelope has been defined for built development. This takes into account the fixed land uses, protected sites and current floodplain. Access routes, public open space and landscaping may lie outside this area. Within this area there are additional sensitivities that will affect the site layout:

- High landscape sensitivity at northern and eastern edges
- Proximity to Wessex Water sewage treatment works (400m consultation zone)
- Proposed waste services and recycling centre
- Future extent of floodplain following impact of climate change.

5.16 Current Vision and Objectives

5.16.1 It is important to create a vision for North Keynsham as this will form the foundation of the Local Plan allocation and the subsequent development and type of place that is created. The vision describes the kind of place the area should become and what is needed physically, economically and socially. It will help to shape what happens on the site, giving it coherence and a real sense of identity and place. The current vision as consulted upon in 2017 is above.

CURRENT VISION FOR NORTH KEYNSHAM

To open up this currently isolated area to its environs in a sensitive way, creating a new sustainable urban neighbourhood with increased access to the River Avon and connecting Keynsham to strategic walking and cycle routes.

This will be a lively, safe, sustainable and healthy place which reinforces the distinctive character of Keynsham, improves connectivity, enhances our understanding and respect of nature and creates spaces around which a new community can start to form.

The community will thrive and develop within a well-integrated and multifunctional green infrastructure network of new wetland features, restored floodplain meadows and new woodland.

5.16.2 The vision and objectives have been derived from the understanding of the site, its history and geography and suggests how a sense of place can be created and related to what is already there. It is important that the vision is not lost during the development of the design, so as it develops, the plan must be constantly checked against the vision. However, the development of the vision and objectives is also an iterative process and must be shaped through consultation with key stakeholders and the wider community; it will therefore evolve through the Local Plan process.

Diagram 20 - Concept Strategic Framework produced for 2017 Local Plan consultation

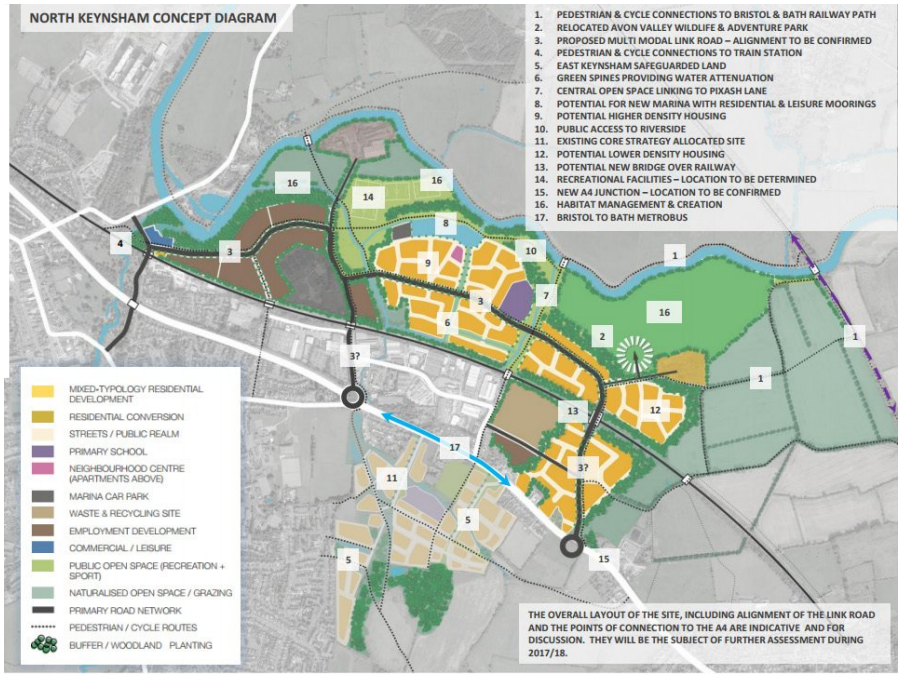


Diagram 21: Current Objectives

5.16.3 A concept framework was produced which responds to the site analysis, vision and objectives which provides a high-level layout and an indication of site capacity. The framework has been structured to optimise residential and employment development, balanced against the flood risk, landscape sensitivity constraints and the limitations of the Health and Safety Executive (HSE) consultation zones around the National Grid gas pipeline. The concept framework was further refined with the help of initial stakeholder engagement (for example through workshops with B&NES Councillors and the Town Council and initial discussions with landowners) to produce the concept framework for the Local Plan issues and options public consultation. The main areas of refinement following the stakeholder and landowner engagement focused around options for the alignment of the link road and incorporating Avon Valley Wildlife and Adventure Park as an integral part of the overall masterplan.

Snapshot of comments made during Local Plan Issues and Options consultation Dec 2017 to Jan 2018.

There was guarded support for the North Keynsham SDL from many of the respondents, with the caveat that growth must be accompanied by appropriate infrastructure that benefits the existing town, as well as enabling the delivery of the new community at the SDL. Some respondents objected to the principle of development here, and a number of key concerns were raised, but many also identified positive opportunities that should be considered – briefly summarised below:

Key concerns included:

- Additional traffic congestion and worsening air quality
- Ensure is provision made for cycling, pedestrians , cars & parking – encourage walking/cycling but balanced & well designed approach needed
- Fragmentation of development by railway line
- Avon Valley Wildlife and Adventure Park – should remain but concerns around noise generation Green Infrastructure strategy needs to be capable of delivery and maintenance
- The proposed development intrudes too close to the river
- Landscape & ecological impacts
- Green Belt must be retained; the SDL reduces the gap between Keynsham and Saltford
- Need to address climate change impacts - zero carbon will be a challenging target to achieve
- Ensure the archaeological sensitivity of the site is fully considered
- Avoid increase in leisure boats on River Avon

Positive opportunities that were identified included:

- Landowner support and integration of the Avon Valley Adventure and Wildlife Park into wider development
- Can create a place that is sustainable; ecologically and environmentally sensitive; safe and encourages healthy lifestyles (e.g. through walking & cycling)
- Deliver a mixed use development with employment land alongside residential – opportunities to meet range of needs within a development of high design quality

- Opportunity to deliver infrastructure, including strategic transport infrastructure , bus priority measures and Metrobus
- Support for the provision of a new river bridge(s) for walking and cycling
- Consider the provision of direct commuter cycle routes to key destinations, including the role of the Bristol-Bath railway path (and links to it) in accommodating sustainable travel
- Continue with aim for achieving a 'net gain' for the environment delivered through a comprehensive green infrastructure plan to deliver multi-functional green infrastructure e.g. ecological, recreation
- Mitigate impact on landscape as best as possible through design, density and planting;
- Opportunities to facilitate river restoration – River could also be part of movement strategy
- Any potential marina should be transformed into a series of canals with moorings for houseboats; this would reinforce the existing community and provide a form of affordable accommodation
- Opportunities to deliver zero carbon development e.g. through Combined Heat & Power (CHP), solar etc. and combine with measures such as provision of green roofs and rainwater harvesting
- Development should include non-commercial community facilities, including at least one multi-use community building (with provision for worship)

5.17 Vision, Strategy Implications & Policy Approaches

5.17.1 The Strategic Planning Framework and the feedback from the 2017 Local Plan Issues and Options consultation raised a number of key issues that required further testing, including the following:

- Link Road alignment
- Street network and wider connections that encourage walking and cycling, creating a healthy neighbourhood
- Landscape impact and green infrastructure provision
- Marina and flood risk
- Potential for a Zero Carbon development

5.17.2 A revised Strategic Planning Framework is in preparation which will be published as evidence to support the Draft Local Plan. The emerging Framework is illustrated below, and is followed by options for the key areas identified above.

5.17.3 The Council proposes to work with the local community and stakeholders to test, expand and refine the vision and objectives for North Keynsham to inform the emerging Strategic Planning Framework and Draft Local Plan. This should focus not just on the quantum of development envisaged, but the kind of place that it should become, so that it becomes the foundation for a more detailed masterplan, Supplementary Planning Document and/or Design Codes.

5.18 Opportunity to create a new Garden Community

5.18.1 As part of the focus on placemaking, a key opportunity is emerging to expand the vision for North Keynsham to create a new community based on Garden City or Garden Community principles. This concept is supported in the NPPF (para 72c) and by the Town and Country Planning Association (TCPA). Most of the principles of a Comunity are also applicable to new communities such as the one being proposed at North Keynsham.

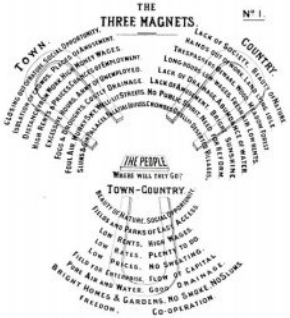
5.18.2 The Strategic Planning Framework already aligns closely with the Garden Community principles. It is proposed that these principles are embedded in the Local Plan so that they become part of the policy framework for the proposed development. This has the advantage of introducing often overlooked elements such as long term stewardship of the land (a key component of Garden Community Principles) as part of the vision, objectives and planning policy framework.

5.18.3 It is suggested to have a policy that provides an overarching context for both SDLs, and that this should reflect the Garden Community Principles as defined by the TCPA.

Diagram 23 - Derwenthorpe Garden Village

Diagram 22 - The Value of Garden Communities

- local community has control in planning
- high quality, affordable housing is delivered to neighbourhoods with character
- both daytime and evening economies offer vibrancy to the streets
- residents and visitors can walk and cycle to local facilities
- self-sustainable lifestyles can be encouraged through community food gardens
- green spaces for people and wildlife are key parts of the community



KSM3 Policy Options for North Keynsham SDL: Garden Community Principles

It is suggested to include a policy that provides an overarching context for the type of development that could be promoted at the North Keynsham SDL. This will help to define the qualities of place that are sought, and will influence the delivery and stewardship arrangements that are required to create successful places. This policy can act as a bridge between the strategic policies set out in the Joint Spatial Plan and the detailed planning policy framework that covers the site allocation.

Option 1: could reflect the Garden Community Principles as adapted from those proposed by the Town and Country Planning Association, and which are re-produced below:

Option 2: An alternative option could be to rely on the existing JSP policy framework, and the site allocation policy that will be developed for the next stage of the Local Plan.

- Land value capture for the benefit of the community.
- Strong vision, leadership and community engagement.
- Community ownership of land and long-term stewardship of assets.
- Mixed-tenure homes and housing types that are genuinely affordable.
- A wide range of local jobs that are relatively accessible by sustainable travel modes from homes.
- Beautifully and imaginatively designed homes with gardens, combining the best of town and country to create healthy communities, and including opportunities to grow food.
- Development that enhances the natural environment, providing a comprehensive green infrastructure network and net biodiversity gains, and that uses zero-carbon and energy-positive technology to ensure climate resilience.
- Strong cultural, recreational and shopping facilities in vibrant, sociable locations, that are walkable or easily accessible via sustainable travel modes.
- Integrated and accessible transport systems to access Bristol, Bath and Whitchurch, with walking, cycling and public transport designed to be the most attractive forms of local transport.

tcpa NEW COMMUNITIES GROUP

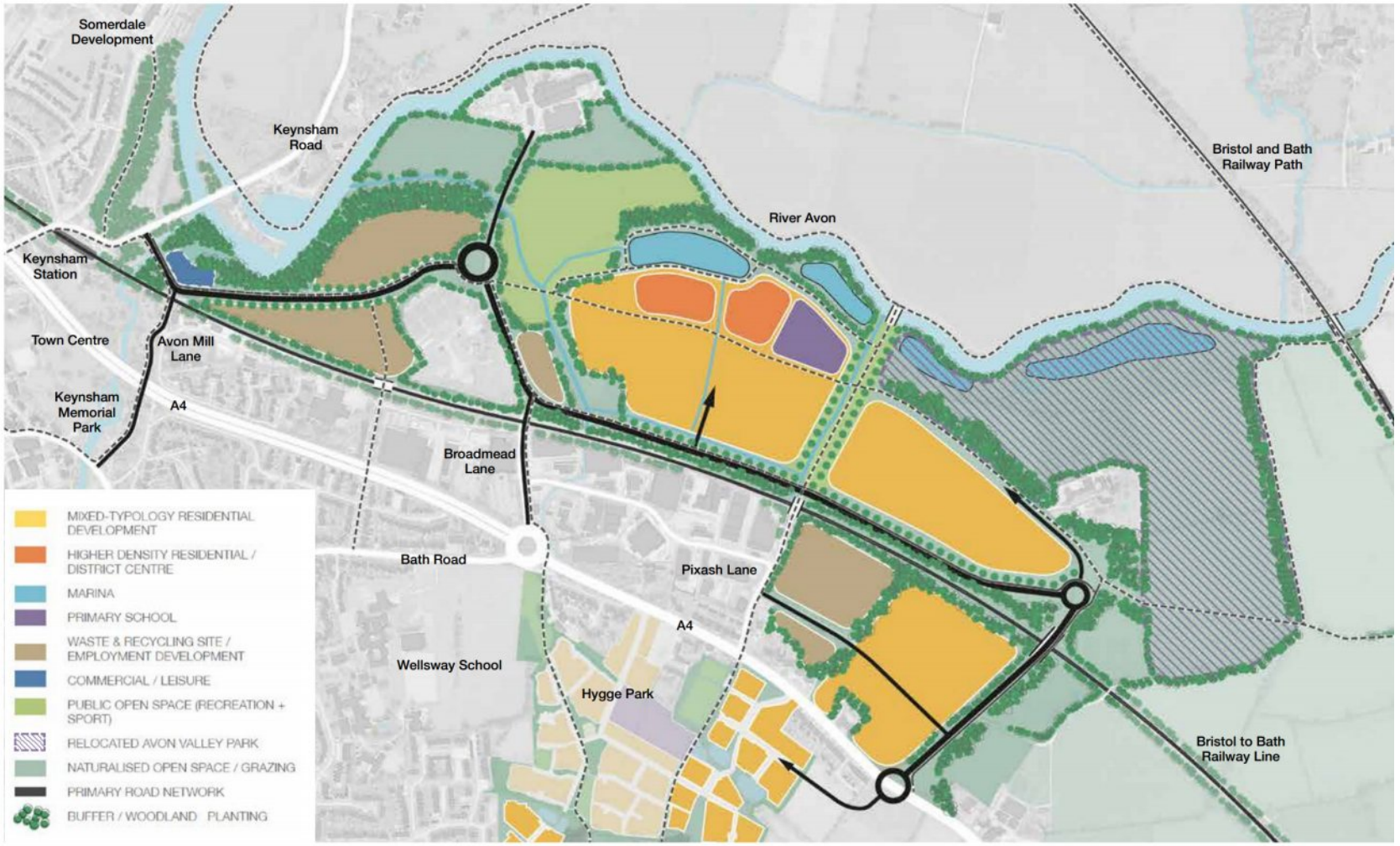


Diagram 24 - Emerging Revised Strategic Planning Framework

5.19 Topic Areas

5.19.1 The following sections set out emerging conclusions from a number of topic specific pieces of work which are feeding into the emerging Strategic Planning Framework and outlines proposed policy approach options.

5.20 Link Road

5.20.1 The West of England Joint Transport Study sets out the strategic transport measures required to address transport issues in the sub-region. Some of the measures were specifically to address the impact of the Strategic Development Locations from the Joint Spatial Plan across the West of England. To support the Local Plan and the North Keynsham SDL, further detail was needed on these measures.

5.20.2 Current traffic congestion in Keynsham is high, journey reliability is poor and the network is saturated. No more development other than that committed through the Core Strategy and PMP can be accommodated without transport interventions. The key strategic transport measure required to support the North Keynsham SDL (including the East Keynsham safeguarded land) is a new road between the A4175 and the A4, which was illustrated in the Strategic Planning Framework concept diagram.

5.20.3 An Options Assessment Report (OAR) for the proposed link road connecting the A4175 to the north of Keynsham with the A4 Bath Road to the east of Keynsham describes the process of analysing the transport challenges, defining link road-specific objectives and identifying and assessing potential interventions to tackle these challenges. This report builds upon the findings of the Joint Transport Study.

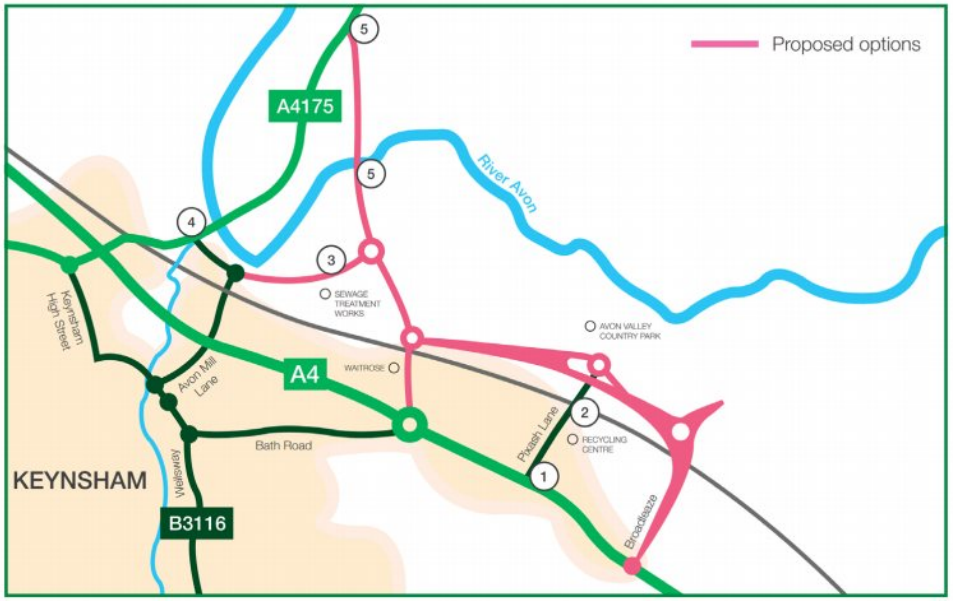
5.20.4 The OAR represents a significant step forward in the development of this strategic transport proposal, but still represents an early stage of option development and assessment. Further scheme development and public consultation will be undertaken during 2018/19.

5.20.5 The OAR demonstrates that sufficient consideration has been given to the case for intervention, assessment of options, technical feasibility, costs, benefits, impacts, potential strength of business case and affordability of the proposed transport scheme. The OARs have been structured and prepared in accordance with the good practice set out by the Department for Transport (DfT). A 'long list' of nine initial alignments was identified as part of this process, with three potential junctions identified on the A4 (Options 1 to 3) and three junctions on the A4175 (Options A to C). The following paragraphs summarise conclusions of the OAR, for full details please refer to the Report.

5.20.6 The DfT Transport Analysis Guidance (TAG) was applied to the nine options, which considered factors such as physical constraints, current land use, deliverability issues, ability to provide access to the SDL, highway access and network impacts. Four options progressed through the initial sifting exercise:

- 2A: Pixash Lane (with new

Diagram 25 - Options for Link Road



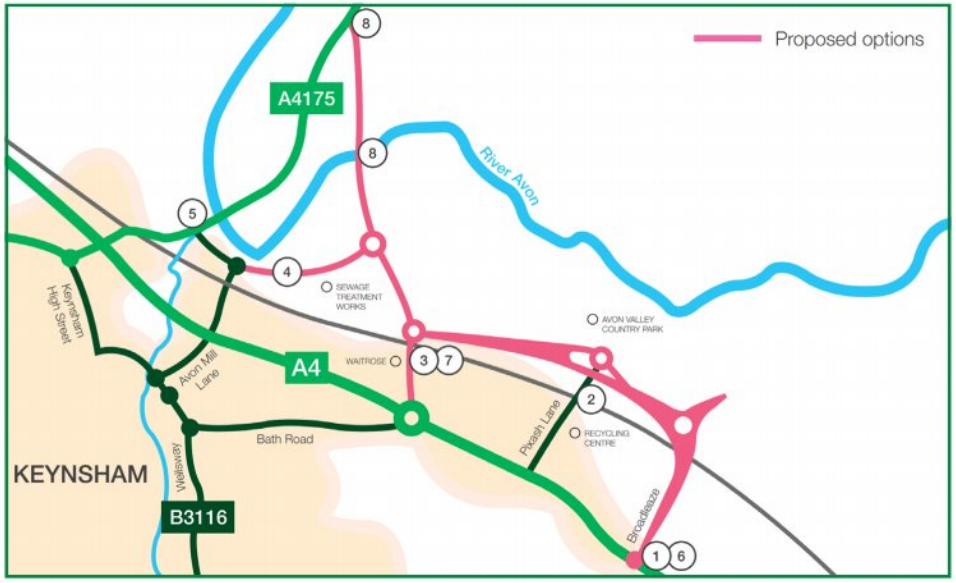
Option 2a: Avon Mill Lane to Pixash Lane

1. Existing A4/Pixash Lane junction improved with traffic signals.
2. A new bridge would be constructed over the railway, just east of the existing Grade II listed bridge that leads to Avon Valley Wildlife Park. The existing bridge would be a pedestrian/cycle shared use path and closed to motorised traffic.
3. A connection to Avon Mill Lane is via a new road adjacent to the north side of the sewage treatment works and through the former Paper Mill site.
4. Includes a signifiant improvement to the Avon Mill Lane/A4175 junction.

Option 2c: New Junction on A4175 to Pixash Lane

As Option 2a, with the following addition:

5. Connection to the A4175 would be via a new bridge across the river and new junction south of Roseneath House.



Option 3a: Avon Mill Lane to A4 Bath Road

1. New junction East of Broadleaze Nursery, with new road connection over railway through land to the east of the Ashmead Industrial Estate.
2. The existing Grade II listed Pixash Lane bridge over the railway would be a pedestrian/cycle shared use path and closed to motorised traffic.
3. Access through the Broadmead Lane bridge would be retained as a one-way vehicular link to the new road.
4. Connection to Avon Mill Lane via a new road adjacent to the north side of the sewage treatment works and through the former paper mill site.
5. Includes a signifiant improvement to the Avon Mill Lane/A4175 junction.

Option 3c: New Junction to A4175 to A4 Bath Road

6. New junction East of Broadleaze Nursery as Option 3a.
7. Access through the Broadmead Lane bridge would be retained as a one-way vehicular link to the new road.
8. Alternative connection to the A4175 with a bridge and new junction South of Roseneath House.

Table 2 - Options Assessment: Scheme costs, network speeds, value for money and key risks

Route	Estimated Cost	Network Average Speed 0700-1000 (mph)	Value for Money	Key Route-Specific Risks
Option 2A: Pixash Lane to Avon Mill Lane	£27.3m	23	High	Implications for delivery of SDL as proposed route would render some parcels of land more difficult to deliver north of the railway. Bridge construction to be agreed with Network Rail. Potential to harm setting of existing Pixash Listed Bridge.
Option 2C: Pixash to new A4175 junction	£50.1m	23	Medium	Implications for delivery of SDL as proposed route would render some parcels of land more difficult to deliver north of the railway. Significant proportion of the alignment through Flood Zones 2 and 3, which may not be acceptable to Environment Agency. Bridge construction to be agreed with Network Rail. Potential to harm setting of existing Pixash Listed Bridge.
Option 3A: A4 new junction to Avon Mill Lane	£23.9m	23	High	Bridge construction to be agreed with Network Rail.
Option 3C: A4 new junction to new junction on A4175	£46.6m	22	Medium	Significant proportion of the alignment through Flood Zones 2 and 3 which may not be acceptable to EA. Bridge construction to be agreed with Network Rail.

bridge across railway) to Avon Mill Lane

- 2C: Pixash Lane (with new bridge across railway) to new A4175 junction (with new bridge across River Avon)
- 3A: A4 new junction (with new bridge across railway) to Avon Mill Lane
- 3C: A4 new junction (with new bridge across railway) to new A4175 junction (with new bridge across River Avon)

5.20.7 The four selected options were modelled using the Keynsham S-Paramics model. This allowed changes to the highway network to be computer simulated to test the effects on traffic flows, speed and delays for specific time periods in a future year (in this case 0700-1000 and 1500-1900, both at 2029). All four options demonstrated a significant saving in overall travel time. In general, the savings with the 'C' alignment to the A4175 performed better than those connecting via Avon Mill Lane ('A' alignment). This is because a new connection to the A4175 avoids interaction with other traffic still using Avon Mill Lane.

5.20.8 However, the 'A' alignments are shown to be better value for money. Scheme costs, network speeds, value for money and key risks are set out in Table 2.

5.20.9 Further work has been undertaken to identify the most appropriate alignment and design parameters to achieve a best fit for the A4 Link Road with a revised Strategic Planning Framework which has required the Council to think about what form the road will take, whether it will run around the development or through it. This exercise has been undertaken based on Option 3A. Two different

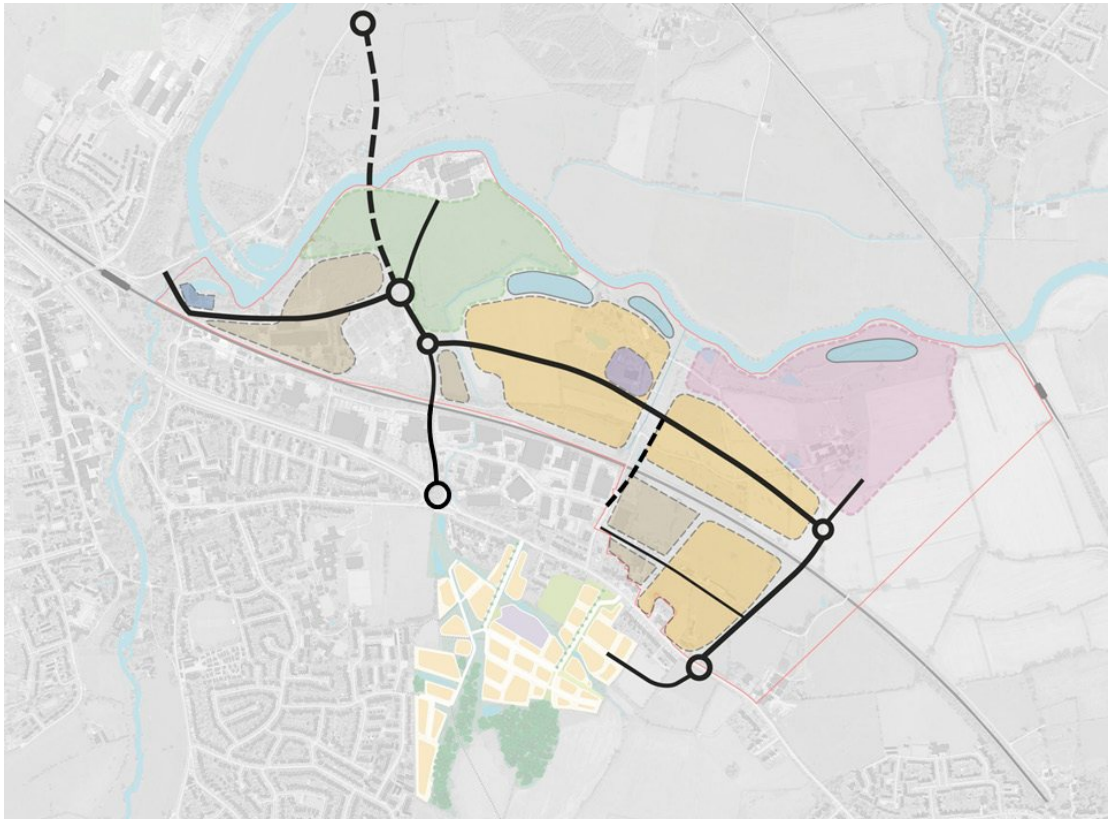


Diagram 26 - Option 3A with Link Road through the SDL

alignment options are shown for the route through the main body of the SDL. Also shown for reference (with dashed lines) are the other alignment options which are also being consulted on (see diagrams 26 and 27).

5.20.10 There are benefits and disbenefits to both approaches. The option for the link road through the SDL was subject to further modelling to test performance. The results showed that the lower threshold speed with a lesser link standard between Broadmead Lane and the GWML bridge makes this section unattractive to 'through' traffic and reduces the attracted flow here (a slower threshold speed can be expected to reduce strategic traffic usage along the affected section by at least 50% and in some cases by nearly 90%). Therefore, although the option for the link road through the SDL has greater benefits in placemaking and urban design terms, it does not perform as well in Highway terms. Therefore, the route parallel to the railway line is proposed to be the preferred alignment within the site.

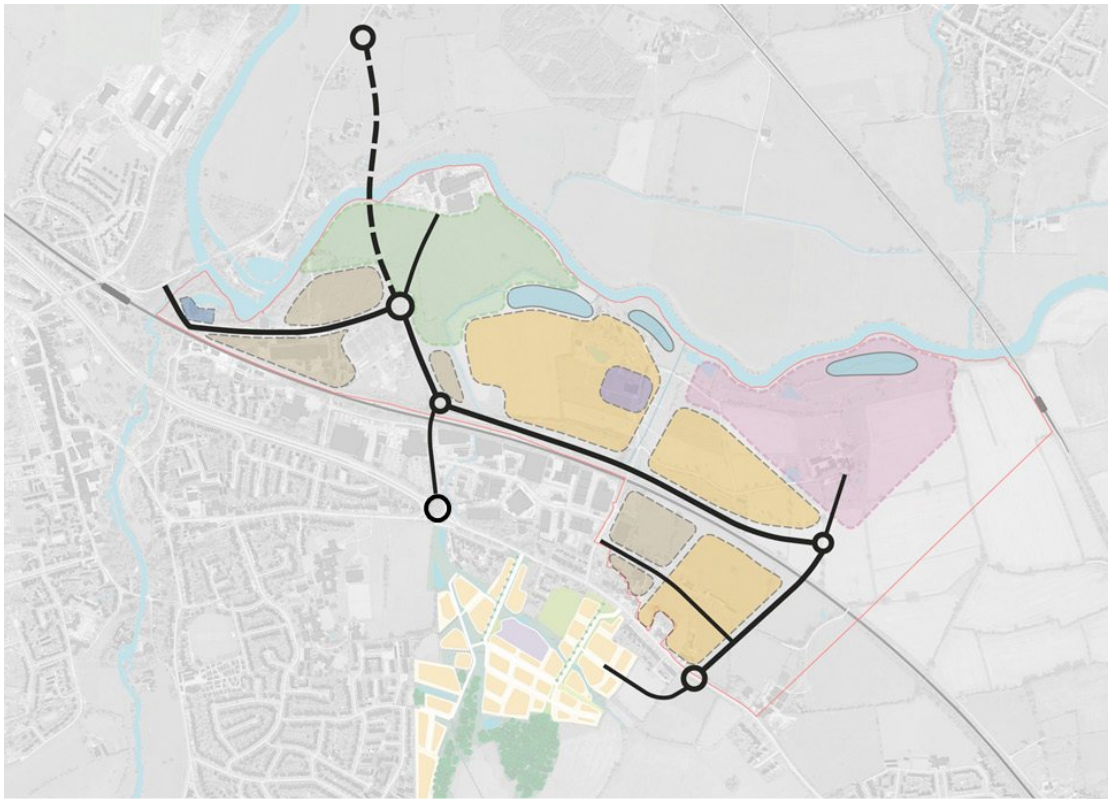


Diagram 27 - Option 3A with Link Road parallel to railway line

5.20.11 The preferred option for the link road alignment will be determined following the Local Plan consultation, after all comments have been taken into account. From a planning and urban design perspective, the next steps after the preferred route is decided would be to focus in more detail on how the development should respond to the link road, in order to deliver the best placemaking outcomes. One suggested approach would be to develop local design guidance which encourages high-quality development and the creation of distinctive places where people want to live.

KSM4 Proposed Policy Options for the Link Road Alignment

The four shortlisted options for the Link Road alignment contained within the Options Assessment Report are all being consulted upon as proposed options.

Option 3A has been used as an example to show the most appropriate alignment of the road within the main body of the site north of the railway line, with the route parallel to the railway line a preferred option.

The Broadmead Lane link under the railway line is proposed to be retained as a one-way vehicular link. Although this route is not being proposed as one of the four shortlisted options for the new link road alignment, there are options regarding the direction of traffic (i.e. north-bound only or south-bound only) which are being consulted upon.

In line with the Joint Spatial Plan, no housing will be completed at the North Keynsham SDL ahead of the Avon Mill Lane to A4 link being completed.

Local design guidance will be developed to focus in more detail on how the development should respond to the link road, in order to deliver the best placemaking outcomes.

5.21 Pedestrian and Cycle connections

5.21.1 Consultation feedback showed strong support for creating a healthy neighbourhood by encouraging walking and cycling. Potential on-site and off-site options to be able to achieve this include the following:

5.21.2 Off-site

- Avon-Mill Lane to Train Station and access to Somerdale: potential routes from the SDL along roadside or across land west of Avon Mill Lane, subject to level changes. Potential enhancements to cycle facilities at the station e.g. bike storage.
- Controlled crossing at Pixash Lane/A4 junction: southbound routes towards community woodland to be provided as part of KE3B build-out.
- North-south link from Keynsham Road to Bath Hill - potential routes along Avon Mill Lane, through Memorial Park (although bylaw currently prohibits this) or along riverside.
- Unity Road pedestrian/cycle link: enhancement of route to Gaston Avenue – improvement to railway and A4 tunnels; further improvements through to Bath Road.
- Cross-river connections to Somerdale: direct route from SDL to south of Sydmead House, across A4175 and Sydenham Mead to Somerdale, connecting to new bridge at Somerdale across to Chequers - would require an additional 2 bridges over River Avon and include part of route within

South Gloucestershire.

- High Street / Station Road/ Bath Hill enhancement: pedestrian and cycle access improvements and public realm enhancements. Partial delivery as part of town centre regeneration scheme

5.21.3 On-site

- East-west cycle route (through SDL from Bristol-Bath Railway Path to Wessex Water site – meets Link Road cycle route through to Keynsham Road)
- Pixash Lane to River Avon route: downgrading existing lane north from Ashmead Road junction to pedestrian/cycle only route; alterations to ramps/ new ramps down to site level to create accessible route, may need to cross link road; onward connection created through site to river; potential footbridge across river – strong network benefit but maintenance implications
- Broadmead Lane: downgrade to one-way; investigate potential to improve pedestrian/cycle provision (but may be difficult to achieve under the narrow bridge)

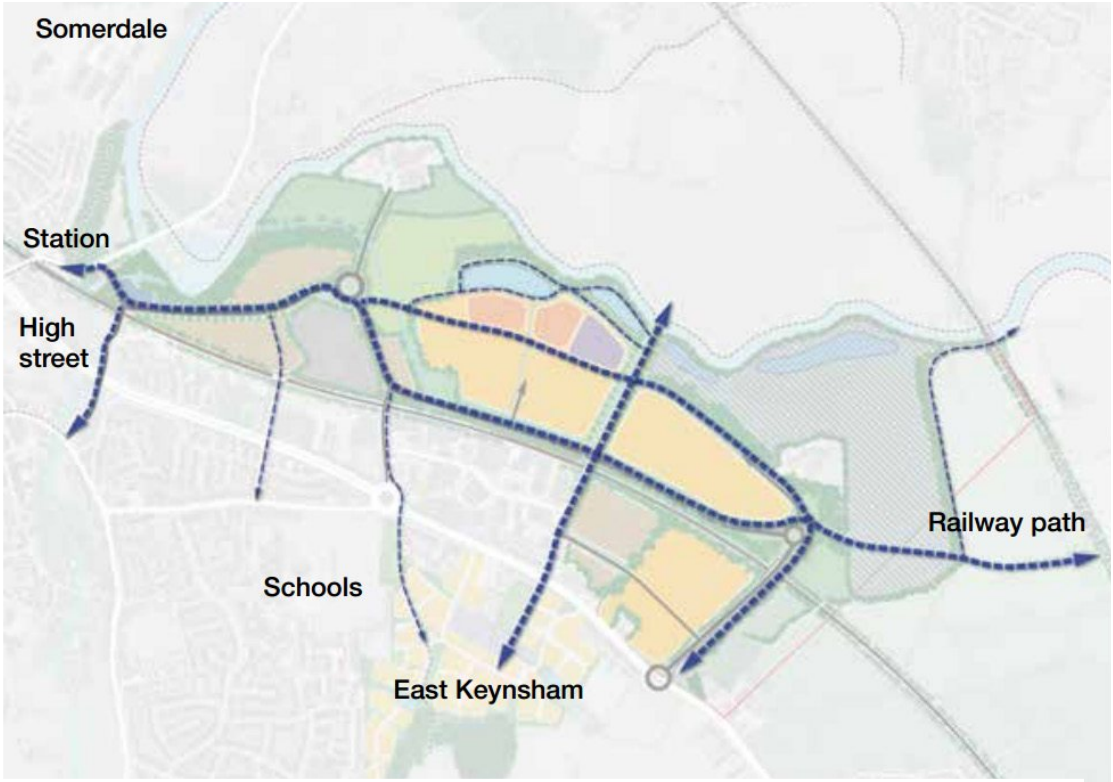


Diagram 28 - Potential strategic pedestrian and cycle connectivity

KSM5 Proposed Policy Options for Pedestrian and Cycle connections

The identified off-site and on-site walking and cycling links above are put forward as options to be considered in order to create a healthy neighbourhood and support modal shift to active travel modes.

The creation of walking and cycling design standards to ensure that all streets created through the development are attractive for walking and cycling is proposed as a preferred option.

- Development of street hierarchy through SDL and creation of walking and cycling design standards to ensure that all streets created through the development are attractive for walking and cycling

5.21.4 These potential pedestrian and cycle connections are illustrated in Diagram 28.

5.21.5 The next steps are to review the above routes, identifying preferred options, outline costs and potential funding mechanisms, and progress with walking and cycling design standards.

5.22 Marina and mooring opportunities

5.22.1 The B&NES Waterspace Study (2017) identifies the benefits of increased mooring opportunities, specifically on the River Avon, to increase activity, natural surveillance and encourage navigation and enjoyment of the local waterways. The demand for moorings relates to all types – 48hr, 14day, trade and residential. Whilst there is no standardised methodology for projecting mooring demand, there is acknowledgement that there is pressure for moorings, with very few visitor moorings along the River Avon, and few on-line moorings that have pontoons. The Waterspace Study shows that the stretch of the River Avon that flows through the North Keynsham site is an area of search for potential additional moorings.

5.22.2 Options for a potential marina(s) as part of the North Keynsham site have been assessed, informed by the findings of the Waterspace Study which identifies that most residential boaters would prefer on-line moorings or small off-line basins. The study looked at the potential for:

- Smaller off-line basins which could provide moorings parallel to the bankside or as bays. This has been identified as the most suitable typology for residential users and likely to need a degree of audio-visual seclusion from the SDL and from passers-by.
- Larger marinas which are likely to consist mainly of fixed bays. These are more suited to leisure users and more appropriate adjacent to the SDL development, potentially as part of a local centre.

5.22.3 A number of options have been identified, illustrated in Diagram 29.

5.22.4 It appears feasible to provide equivalent and greater volumes of additional flood storage by providing marina(s) in the location(s) illustrated. In line with previous modelling at-least equivalent flood risk improvement benefits would be demonstrated, and additional benefits derived from the additional volumes provided at higher flood stages.

5.22.5 Further consideration needs to be given to the potential for commercial delivery, the impacts on level change which may restrict the potential for interaction between the development and the waterside and require a considered approach to landscaping

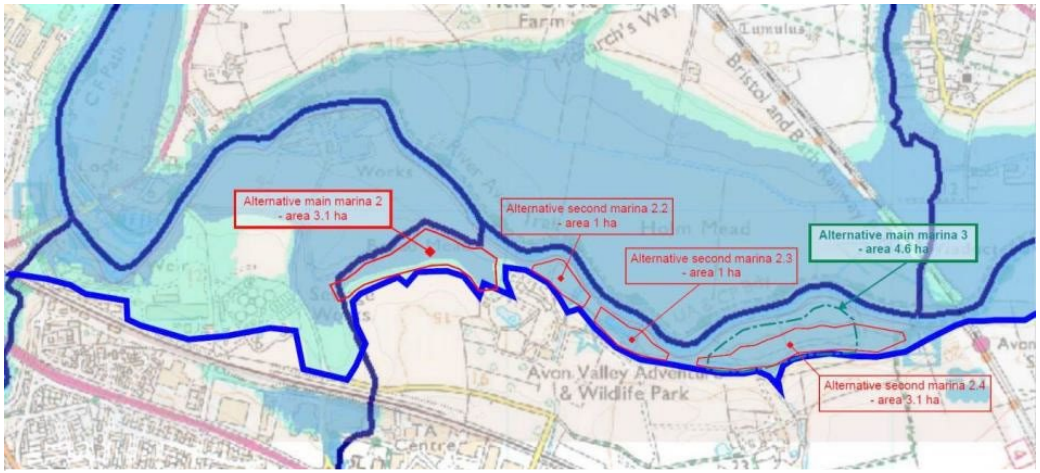


Diagram 29 - Potential marina / new mooring locations

Option	Appropriate Typology	Area	Bankside length	Capacity (approx.)
Main marina 2	Commercial	3.1 ha max.	-	245 moorings
Main marina 3	Commercial	4.6 ha max.	-	300 moorings
Second marina 2.2	Small off-line basin	1 ha	360m	17 moorings (based on 60ft craft / 70ft spacing)
Second marina 2.3	Small off-line basin	1 ha	434m	20 moorings (based on 60ft craft / 70ft spacing)
Second marina 2.4	Small off-line basin	3.1 ha	1099m	52 moorings (based on 60ft craft / 70ft spacing)

KSM6 Proposed Policy Options for potential marina locations

The identified marina locations and typologies (i.e. smaller off-line basins for residential users or larger marinas with fixed bays for leisure users) in Diagram 31 are put forward as options to be considered in order to create new and improved moorings.

5.23 Flooding

5.23.1 The 2018 Strategic Flood Risk Assessment (SFRA) states that development at Keynsham should preferably be located outside of areas shown to be at current or future risk of flooding where possible. The North Keynsham SDL proposes some employment development in Flood Zone 2 towards the east of the site (all residential development is proposed to be outside of the flood zone areas). A Level 2 SFRA will therefore be produced to support the Draft Local Plan.

5.23.2 The Level 1 SFRA assesses

Diagram 30 - Areas of Search for New and Improved Moorings (Waterspace Study)

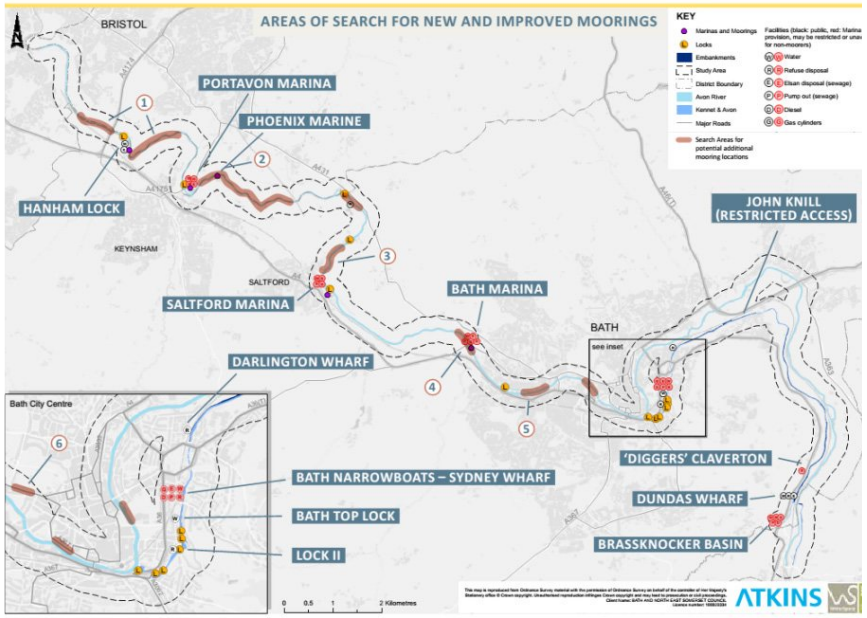
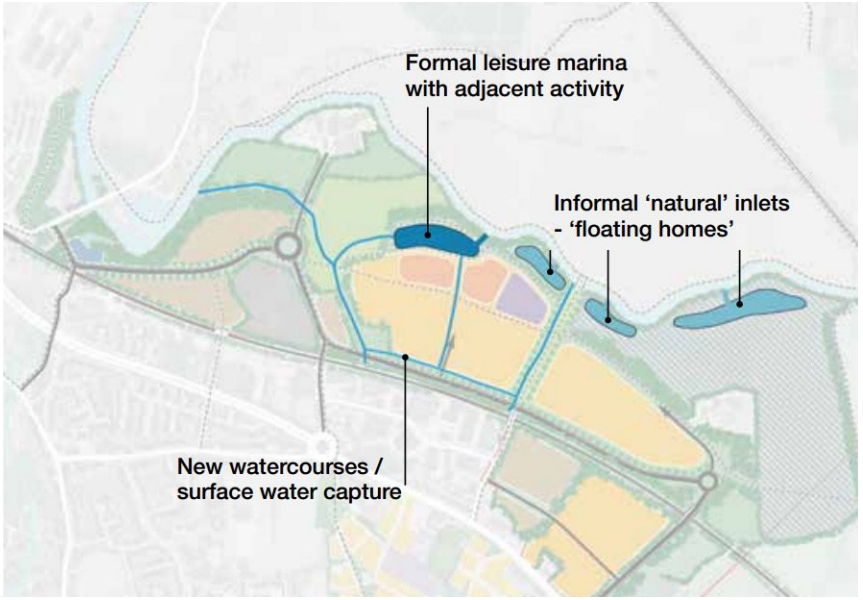


Diagram 31 - Waterside Opportunities:

Potential Marina and SuDS locations



KSM7 Proposed Policy Approach for flooding

Incorporate Sustainable Drainage Systems (SuDS) into the scheme as part of the green infrastructure and flood prevention strategies.

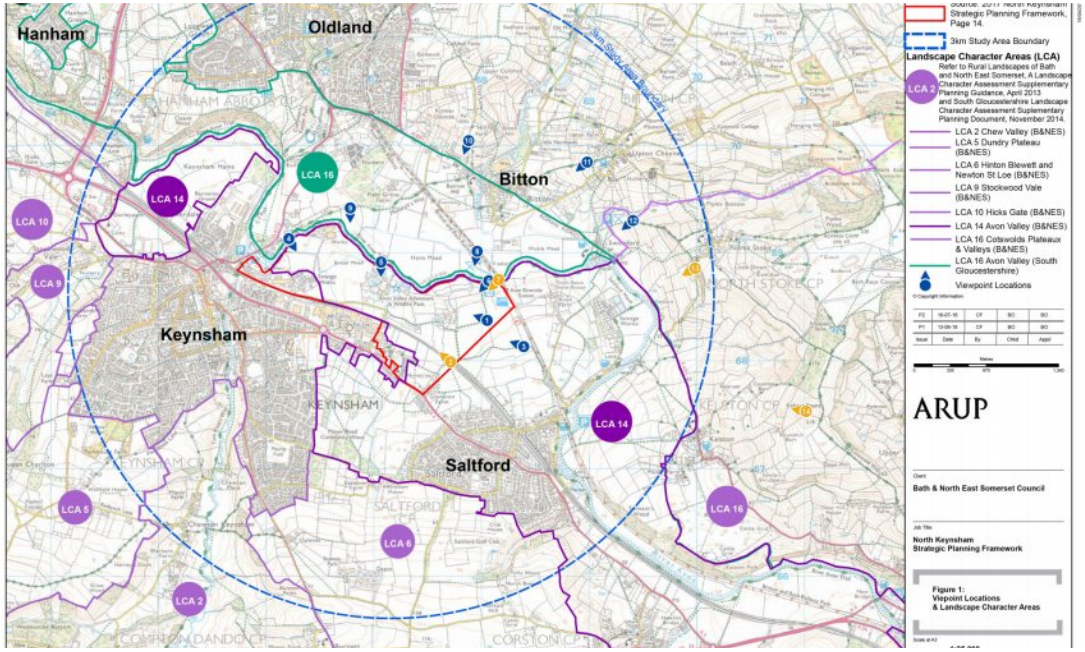
the potential for use of Sustainable Drainage Systems (SuDS) at Keynsham. In areas that are at risk of flooding from surface water, development could provide opportunity to reduce this risk through reduction in impermeable surfaces and use of SuDS. The infiltration potential mapping indicates that most of Keynsham is probably compatible for infiltration SuDS. Areas of historic landfill north of the sewage treatment works and to the south of Stidham lane would require thorough ground investigations as part of a detailed site-specific Flood Risk Assessment to determine the extent of any contamination and the impact that this might have on SuDS.

5.24 Landscape and Green Infrastructure

5.24.1 A full Landscape and Visual Impact Assessment (LVIA) is in preparation which will be completed when a preferred option for the SDL link road alignment is determined, after the Local Plan consultation. The assessment will measure and record the potential for impacts on the character of the local landscape and on views and visual amenity including from the Cotswolds AONB. Mitigation considered necessary to avoid or minimise landscape or visual effects and to link into and reinforce the green infrastructure network will be fed back into a revised Strategic Planning Framework. Character areas, viewpoints etc. to be assessed are summarised in Diagram 32:

5.24.2 A number of general themes/ opportunities have already started

Diagram 32 - LVIA character areas and assessment locations



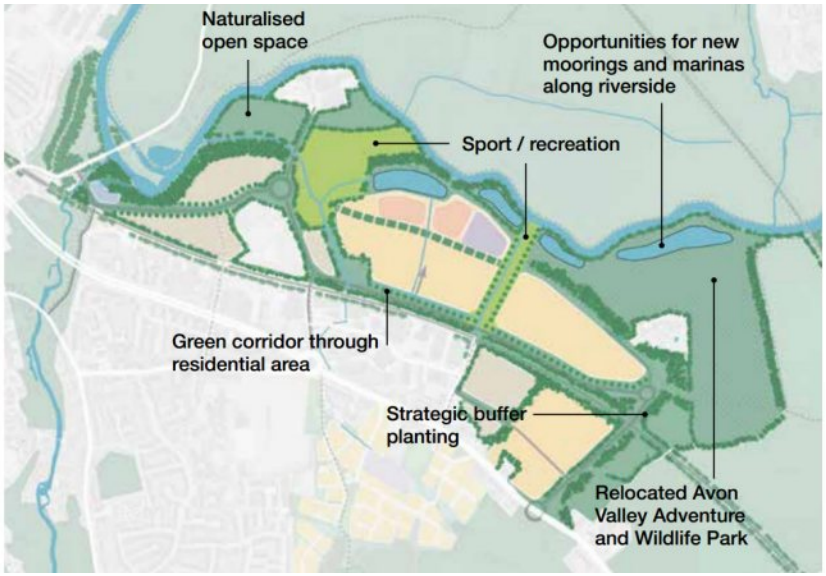


Diagram 33 - Emerging Green Infrastructure Opportunities

to emerge which should feed back into the vision and objectives for the site. These will be expanded upon through the LVIA work and the West of England Green Infrastructure Plan.

5.25 Zero Carbon Development

5.25.1 The planning system supports the transition to a low carbon future in a changing climate. The NPPF states that planning should help to contribute to radical reductions in greenhouse gas emissions and support renewable and low carbon energy and associated infrastructure. Plans are required to provide a positive strategy for energy from these sources, that maximises the potential for suitable development; consider identifying suitable areas for renewable and low carbon energy sources and supporting infrastructure; and identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-ordinating potential heat customers and suppliers.

5.25.2 In response, the Joint Spatial Plan requires all new development to minimise energy demand and maximise the use of renewable energy, and where viable meeting all demands for heat and power without increasing carbon emissions. Through the production of the Local Plan, the Council will be investigating the potential for development at North Keynsham to be built to a Zero Carbon standard (net zero emissions from regulated and unregulated heat and power).

5.25.3 A report has been prepared

to understand the viability of zero or low carbon developments at the SDLs throughout the West of England. The study models how much carbon dioxide would be emitted by both the domestic and non-domestic elements of the development on an annual basis, and investigates the technical routes and associated costs of meeting both definitions of zero carbon development: zero regulated emissions and 'zero total emission'. The findings show that there are routes to zero carbon development that could be applied to each SDL. In summary, this requires improving the building fabric to the equivalent of Code for Sustainable Homes Level 4 (a 19% reduction in regulated emissions from a baseline of Part L 2013) and deploying the maximum possible levels of rooftop solar PV.

5.25.4 To achieve the zero carbon aim, the remaining emissions would need to be addressed by offsite measures, allowable solutions or a higher level of fabric performance. For North Keynsham, the study puts forward options for consideration regarding offsite PV, offsite wind or an onsite heat network combined with offsite PV. The study also noted that there was just under 8.5MVA of grid capacity available which is sufficient to support the offsite renewables required to meet zero carbon emissions. Technically, meeting zero carbon through a wind turbine is possible as there is sufficient unconstrained wind resource within a 2km boundary of Keynsham and Whitchurch.

5.25.5 A District Heating Feasibility Review has been undertaken to provide a high level assessment of the potential for district heating for the North Keynsham SDL. Whilst the potential range of uses across the site make heat demand uncertain at this point, two site specific opportunities for heat supply were identified in the River Avon (which could act as a heat source for heat pumps), and the Sewage Treatment Works (where warm sewage could act as a heat source for heat pumps). Either of these sources could be used to create an ambient temperature heat network, with heat pumps located at building level. This approach would

Opportunities

1. Opportunity for river source heat pumps
2. Saturated ground and open land area suit ground source heat pumps
3. WWTP anaerobic digestion opportunity
4. Sewage heat recovery from WWTP
5. Not in an air quality management area – opportunity for biomass
6. >50 dwellings per hectare at heart of site- high heat density
7. No significant electricity constraints assumed for the site
8. Opportunity to provide private wire connection to WWTP if anaerobic digestion used
9. Expansion of Avon Valley Country Park

Constraints

10. Likely phasing strategy of developing from both ends to centre does not suite heat networks
11. River is a constraint on future expansion of district heating
12. Railway is a constraint on future expansion of district heating
13. Low density adjacent development
14. Unlikely to be significant new development adjacent to the scheme
15. Coordination will be required with sewage mains running through site
16. Gas reinforcement will be required for the site
17. Development already granted outline planning permission so not possible to compel connection to heat network

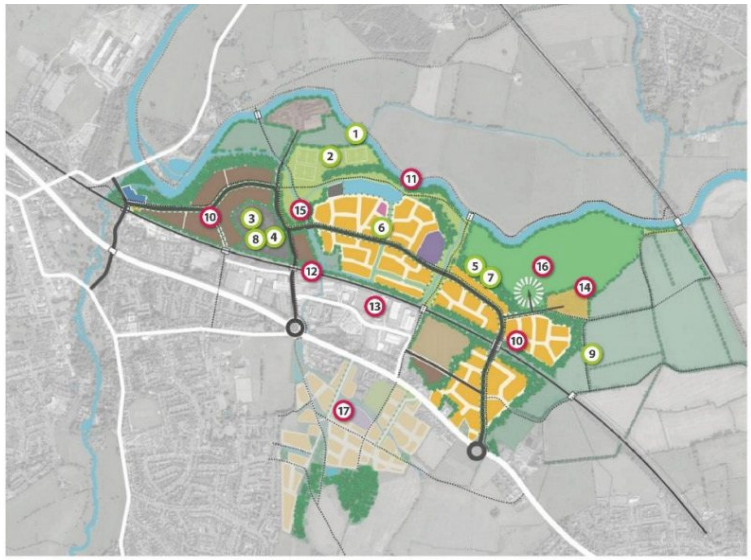


Diagram 34 - District Heating Opportunities and Constraints

reduce the high pipe infrastructure costs and heat losses that are normally problems of heat networks in low density areas. The study recommends that consideration is given to identifying the North Keynsham SDL as a District Heating Priority area. This is recommended to focus on development to the north of the A4, as the development to the south of the A4 might not be able to support a traditional district heating network.

5.25.6 Municipal sewage's temperature is typically between 10°C and 20°C, which, when coupled with a heat pump, can be an efficient heat source for hot water. Two main methods of heat recovery could be considered: at the sewage treatment works itself or from the sewage pipework. Wessex Water have investigated heat recovery at their treatment plants, but have not taken any schemes forward, partly due to lack of heat demand to supply. Further work will be required with Wessex Water to determine their openness to schemes that extract heat directly from a sewer or directly from the treatment works.

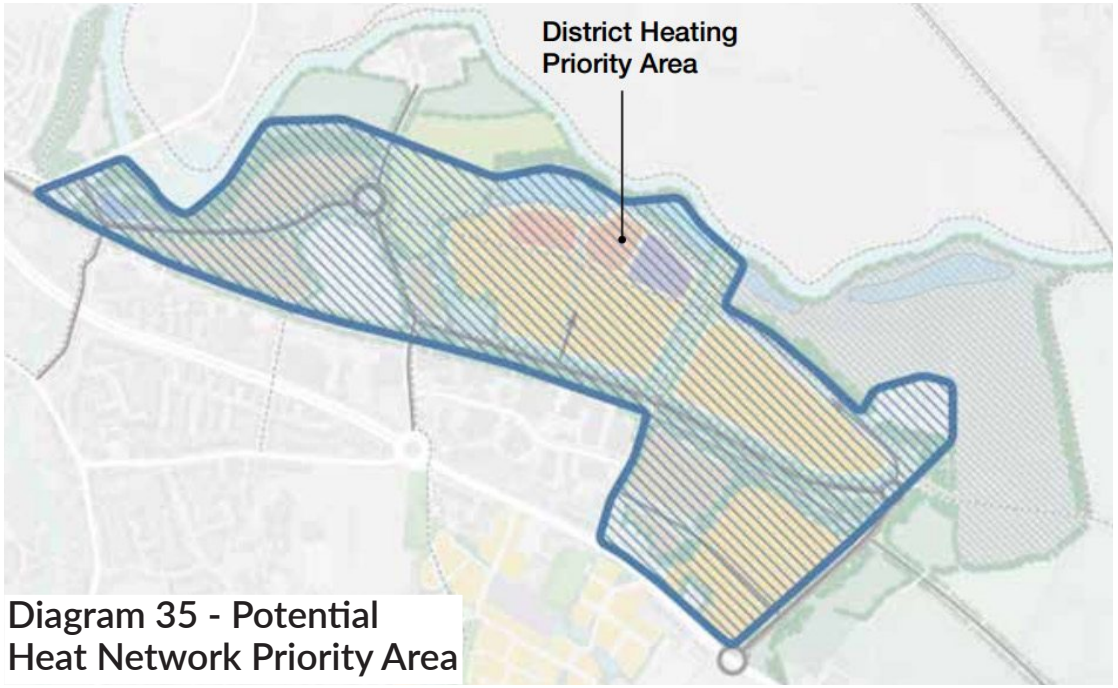


Diagram 35 - Potential Heat Network Priority Area

KSM8 Proposed Policy Approach for a Potential Heat Network Priority Area

Identify the area shown in Diagram 35 as a Heat Network Priority Area, linked to the relevant District Heating policy within the Local Plan (Policy CP4)

5.26 Avon Valley Adventure and Wildlife Park

5.26.1 Avon Valley Wildlife and Adventure Park is an important local business and tourist attraction (the 3rd largest tourist attraction in B&NES and the 10th largest in the West of England). Originally established as a Country park and farm attraction, the park has evolved

KSM9 Proposed Policy Approach for the Avon Valley Adventure and Wildlife Park

Progress the Strategic Planning Framework to fully integrate the future requirements of the Park with the wider development to provide a cohesive and integrated design, ensuring the visual impact on views from sensitive locations is minimised.

Consider the range of uses to be accommodated within the park, including the potential for visitor accommodation.

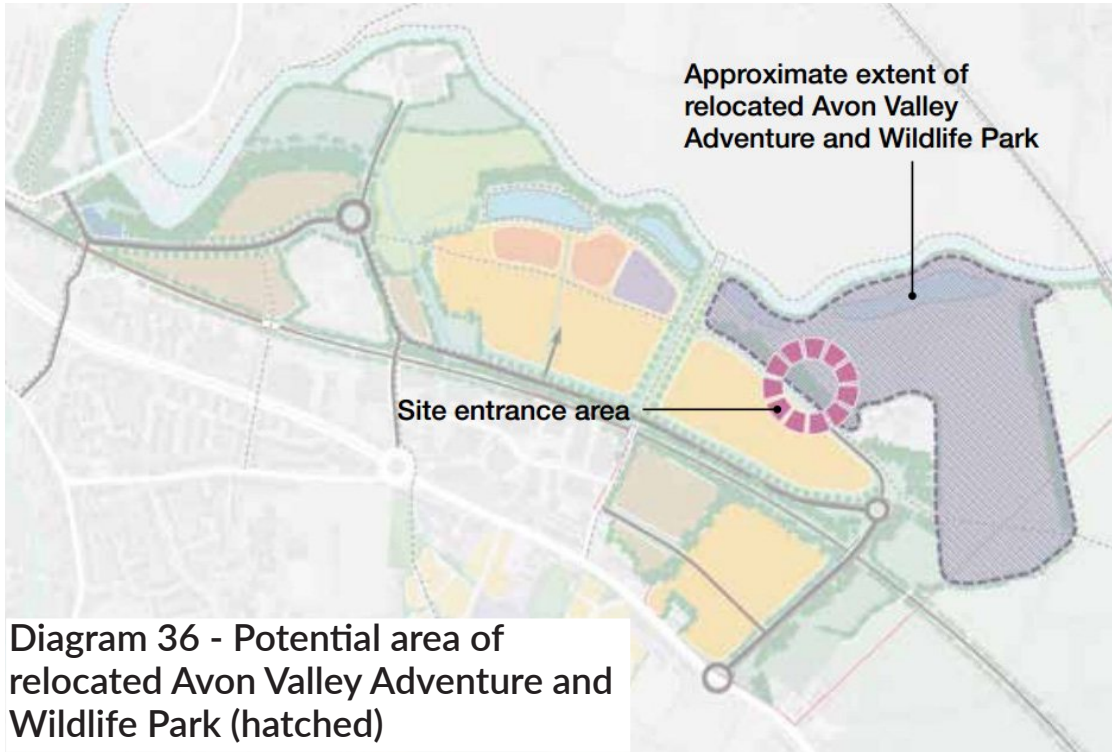


Diagram 36 - Potential area of relocated Avon Valley Adventure and Wildlife Park (hatched)

to offer a variety of attractions and events. An enhanced and relocated Park will be an integral part of the North Keynsham site.

5.26.2 The revised Strategic Planning Framework will seek to integrate the future requirements of the Park with the wider development to provide a cohesive and integrated design. The Park is keen to expand their offer, have better links to the riverside and railway path, improve their sustainability credentials, and include more community facilities (some of which could be 'outside the wire' of the park and therefore unrestricted by access charges). This expanded offer could include visitor accommodation in line with the findings of the Visitor Accommodation Study. The potential for a marina could also be explored.

5.26.3 The main facilities are proposed to be relocated to the north-eastern end adjacent to Avon Valley Farm. These should be laid out to minimise visual impact on views from sensitive locations. Larger buildings and structures and any features such as parking should be appropriately screened

using planting. Potential impact on residential amenity in terms of noise disturbance will also need to be assessed. Delivering access to the Bristol to Bath cycle path will be a key requirement.

5.27 Community Facilities and Education Provision

5.27.1 In addition to the emerging disposition of residential and employment uses across the site, it is important that residents have access to community, recreational and shopping facilities. The Strategic Planning Framework identifies a broad location for provision of a new local centre and a new primary school. This is likely to be a three form entry primary school, which could also be an all through facility taking in the needs of Early Education and Childcare for children under reception age. Existing primary schools in Keynsham may also need to be expanded. The existing Wellsway Secondary School would need to be expanded in order to provide sufficient secondary education capacity for the new community.

5.27.2 Feedback from previous consultation demonstrated support for inclusion of community facilities within the site, with suggestions that this could include the delivery of at least one multi-use community building. One of the key Garden Community principles is to provide strong cultural facilities in walkable, sociable neighbourhoods to create an appealing and vibrant new place in which people will want to live.

5.27.3 The proposed policy approach therefore includes provision of education and community facilities as a site requirement, which needs to be fully integrated into the Strategic Planning Framework.

KSM10 Proposed Policy Approach for Community Facilities and Education Provision

Include provision of education and community facilities within the planning policy framework for North Keynsham as a site requirement.

Progress the Strategic Planning Framework to fully integrate these uses within the site, with a focus on ensuring the delivery of a walkable, sociable neighbourhood in line with Garden Community principles.

Diagram 37 - Potential Development Precedents











6. Whitchurch Strategic Development Location

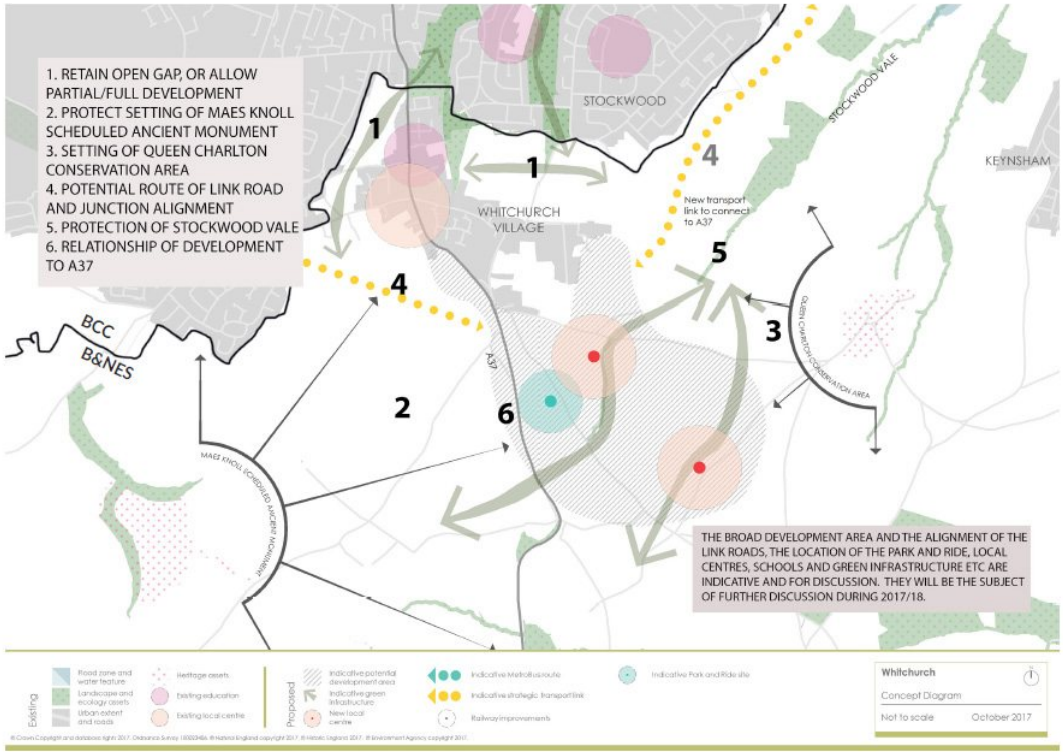
6.1 Aims & objectives

6.1.1 The Strategic Development Location at Whitchurch has been identified in the West of England Joint Spatial Plan (JSP) as an appropriate location for delivering around 2,000 new homes including affordable housing, with 1,600 homes built in the plan period, and employment spaces at a quantum and of a type to be determined. This is to be undertaken in a way which also protects and enhances the area's significant environmental qualities. It is a challenging task, but with the right commitment and policy framework, it is achievable.

6.1.2 One of the aims of the Local Plan, is to enable development to be delivered. It will do this by defining and allocating areas for development (thereby removing the land from the Green Belt and defining a new Green Belt boundary) and then by setting out the development requirements and design principles against which future planning applications will be assessed.

6.1.3 However, the Local Plan is not simply about enabling development, it is an important tool in shaping the quality of our future communities. The Local Plan is about reconciling a range of competing requirements to create a great place. It is about providing the conditions for the communities of the future to flourish; it is about achieving changes that addresses some of our most pressing needs; enabling a shift to more sustainable modes of travel, responding to climate change, achieving a range of homes, securing jobs that support a healthy economy, provision of necessary infrastructure and facilities, ensuring the provision of biodiversity and environmental enhancements to create enriching and inspiring places.

Diagram 38 - Concept Diagram from previous consultation



Snapshot of comments made during Local Plan Issues & Options consultation Dec 2017 to Jan 2018.

Key concerns relate to the:

- negative impacts of new road infrastructure
- increased congestion, noise and pollution.
- severe impact on the character of Whitchurch Village
- negative impacts on tranquillity of Stockwood Vale
- loss of Green Belt
- historic sensitivity of Queen Charlton village
- setting of Maes Knoll

Despite the overwhelming objection to the principle of development, there were some positive opportunities that were identified:

- The provision of an enhanced network of footpaths and cycle routes connecting to Bristol, Keynsham and Chew Valley areas.
- That the development would bring with it sustainable local facilities including employment opportunities
- Important that local centre(s) include a range of facilities e.g. health centre, local shops. Should try and avoid retail park type development.
- Supportive of affordable housing and stressed the need for it to enable local younger people to stay and live locally.
- Need for some smaller houses and flats for both ends of the age spectrum; starter homes for the young and housing into which elderly people could downsize.
- Desperate need for new housing in the area, particularly for affordable housing and housing that was genuinely affordable (not just shared ownership or higher-rent housing association) like more social housing.
- The importance of the orbital route as an alternative to the A37 was referred to, including ensuring it links well to other elements of South Bristol link to the west.
- Importance of biodiversity and green infrastructure
- Importance of Stockwood Vale as valued green infrastructure recognised

6.1.4 The objectives of the Local Plan as they relate to Whitchurch are therefore diverse and complex.

6.2 Previous Local Plan consultation Dec 2017 - Jan 2018

6.2.1 Early stage consultation was undertaken last year on the Local Plan Issues and Options document. This explored various high level issues and options for development in the Whitchurch area, included a Concept Diagram (Diagram 38) and series of questions about the potential development. The table below is a snapshot of the key comments made.

6.2.3 It was clear that most respondents do not want to see this scale of development in this location, with a common response being that there are more appropriate locations to accommodate housing growth. The Whitchurch location has been selected as part of the process of producing the JSP and this will be examined by the Planning Inspectors at the forthcoming hearings. The principle of development in this location is therefore not one that the Local Plan is exploring. Instead, the Local Plan looks in more detail as to the nature of the place that is created.

6.3 Community Engagement

6.3.1 During the process of producing the Local Plan, the Council has had a number of meetings with members of Whitchurch Parish Council and residents who were involved in producing the Whitchurch Village Neighbourhood Plan. These meeting have been without prejudicing or compromising their rights to object to the identification of this area as a Strategic Development Location (SDL) through the JSP examination.

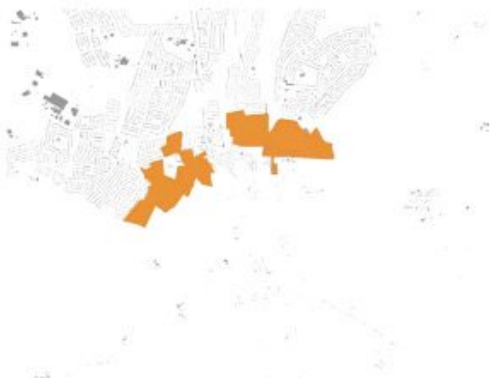
6.3.2 Engagement and consultation with the local community will continue during the production of the Local Plan and beyond to ensure the delivery of a high quality new community within the Whitchurch area.

6.4 An Emerging Strategic Planning Framework

Conceptual Framework

6.4.1 An Emerging Strategic Planning Framework has been produced to explore appropriate spatial options for delivering around 2,000 homes and associated infrastructure and to generate the aspirational policy context that will help to create an exemplar new community in the Whitchurch area. The Strategic Planning Framework forms an important part of the evidence base for the allocation of the development area within the Local Plan, and is available [at the start of the consultation period] via this project website: http://www.bathnes-gardencommunities.co.uk/. It will be used as the basis of further challenge and exploration with the local community and other stakeholders to achieve a high quality new development.

6.4.2 The framework started with a thorough understanding of the



Option 1 - Extend Bristol

Option 2 - Extend Whitchurch

Option 3 - Individual Settlements

WCH1 Policy Options for the Strategic Planning Framework

Whilst the Strategic Planning Framework is suggesting a potential way forward for delivering the requirements set out in the JSP, the principle of exploring reasonable alternative options needs to be explored and tested through the Local Plan process. The Council has assessed the options below, on which comments are invited. The Council's preferred approach is largely based on option 3. The principles and more detailed alternatives based on this option are progressed further later in this section.

- Option 1: Extending Bristol by infilling the existing Green Belt gap between Whitchurch Village and the Bristol urban area
- Option 2: Extending Whitchurch Village to accommodation all the proposed development.
- Option 3: The creation of an individual settlement to the south east of Whitchurch Village itself, complemented with an expansion of Whitchurch Village to the east.

It is important to note that the requirement is to meet the higher level policy context provided by the JSP, and this includes the level of housing requirement. It may well be that a combination of the above options is required to enable this policy to be satisfied.

existing evidence base that was commissioned for the area, and then explored various conceptual ideas about how development should best respond to this context and assessed potential high level locational options for development. The diagrams above show these locational options(see also WCH1):

6.4.3 For the purposes of progressing the Emerging Strategic Planning Framework and the Local Plan, the preferred option that emerged through a consideration of the pros and cons, including the response to the environmental context as well as the emerging alignment of the link road, is largely based on option 3 and the creation of a separate settlement. This reflects the previous consultation and would protect the valued gap between Whitchurch Village and Bristol, help to maintain the village's separate identity, and allow the creation of a new community, connected but distinct from its surrounding context.

6.5 Garden Community Principles

6.5.1 The preferred approach from the Emerging Strategic Planning Framework aligns closely with the Garden City principles as defined by the Town and Country Planning Association (TCPA). It should be noted that most of the principles of a Garden City or Community are also

Diagram 39 - Derwenthorpe Garden Village

WCH2 Policy Options for Whitchurch SDL: Garden Community Principles

It is suggested to include a policy that provides an overarching context for the type of development that could be promoted at the Whitchurch SDL. This will help to define the qualities of place that are sought, and will influence the delivery and stewardship arrangements that are required to create successful places. This policy can act as a bridge between the strategic policies set out in the Joint Spatial Plan and the detailed planning policy framework that covers the site allocation.

Option 1: could reflect the Garden Community Principles as adapted from those proposed by the Town and Country Planning Association, and which are re-produced below:

Option 2: An alternative option could be to rely on the existing JSP policy framework, and the site allocation policy that will be developed for the next stage of the Local Plan.

A Garden Community is a holistically planned new settlement which enhances the natural environment and offers high-quality affordable housing and locally accessible work in beautiful, healthy and sociable communities. The Garden Community Principles are an indivisible and interlocking framework for their delivery, and include:

- Land value capture for the benefit of the community.
- Strong vision, leadership and community engagement.
- Community ownership of land and long-term stewardship of assets.
- Mixed-tenure homes and housing types that are genuinely affordable.
- A wide range of local jobs that are relatively accessible by sustainable travel modes from homes.
- Beautifully and imaginatively designed homes with gardens, combining the best of town and country to create healthy communities, and including opportunities to grow food.
- Development that enhances the natural environment, providing a comprehensive green infrastructure network and net biodiversity gains, and that uses zero-carbon and energy-positive technology to ensure climate resilience.
- Strong cultural, recreational and shopping facilities in vibrant, sociable locations, that are walkable or easily accessible via sustainable travel modes.
- Integrated and accessible transport systems to access Bristol, Bath and Keynsham, with walking, cycling and public transport designed to be the most attractive forms of local transport.

applicable to village communities such as the one being proposed in the Whitchurch area.

6.5.2 It is proposed that these principles, slightly amended to reflect the size and role of the development, are embedded in the Local Plan so that they become part of the placemaking framework for the proposed development. This approach is supported in the NPPF.

6.6 Development Area Definition

6.6.1 The Emerging Strategic Planning Framework identified the following key elements that help to define the development area:

- The broad location of the proposed new orbital route
- The setting of Maes Knoll and Queen Charlton conservation area
- Green Infrastructure link from Stockwood Vale through the development area, via the hedgerow network, to woodland to the south, and west to Maes Knoll.
- An additional development opportunity to the eastern edge of Whitchurch Village.
- A new settlement located south of the new orbital link and east of the A37.

6.6.2 These key elements are illustrated in the sequence of diagrams below:

Diagram 40 - Key elements that will define the development area

1 Orbital zone

A movement zone has been safeguarded for the proposed Orbital link route. A number of links connecting into Bristol are currently being explored. This zone is illustrative only.

2 Green infrastructure

The strategy is to connect existing pockets of green infrastructure through the SDL via new green links. These links are informed by the topography, location of existing green spaces and proximity to the zone of the proposed Orbital route.

3 Key landscape landmarks

Key views to landscape focal points such as Maes Knoll and Stockwood Vale are also retained and enhanced where possible.

The heritage setting of Queen Charlton will also be a key influence on where development occurs and how it relates to the village.

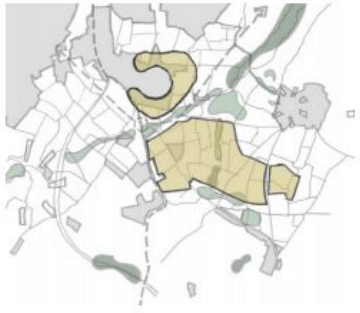
4 Extending Whitchurch Village

There is scope to provide appropriately scaled infill development at Whitchurch Village, which retains the existing character and respects the surrounding countryside.

5 New settlement

A new settlement is proposed east of the A37. It will be clearly defined on its northern edge by the Orbital zone and distinct from neighbouring communities, yet well connected to its context by pedestrian/cycle friendly routes.

6 The Strategic Framework



The combination of reshaping the development area of Whitchurch, and the proposed development south of the Orbital zone will form the strategic framework for development. This will be underpinned by the green and blue infrastructure strategy.

6.7 Strategic Design Objectives

6.7.1 Strategic Design Objectives have been devised to help guide the formulation of the policy framework, ensuring that it is effective in delivering the placemaking aspirations for the new development. They are an evolution of the strategic policies contained in the Joint Spatial Plan, particularly 'Policy 5 Place Shaping Principles' and 'Policy 7.2 – Whitchurch' and are more detailed objectives that would sit within the context of and help to deliver the Garden Community Principles outlined in WCH2.

WCH3 Proposed Policy Approach for Strategic Design Objectives

The Strategic Design objectives set out here will be used to guide the development of the new community. These will inform the planning policy framework of the Local Plan.

A Distinctive Place:

- The new village will contribute positively to local character and distinctiveness. It will take clues and cues from Queen Charlton and Whitchurch Village distinctive characters, as inspiration, but will form a contemporary new neighbourhood with its own character and qualities.
- It will have a clear structure with a mixture of spaces and streets which provide a strong sense of place.
- It will contain a range of densities across the village reflecting the types of street and spaces and reinforcing the urban structure.
- It will have a range of homes for all ages and offer a range of affordable housing.
- It will have community and education facilities offering opportunities for all.

Connected to the Landscape:

- Design and settlement structure should work with the landscape and historic character, and respond appropriately to its setting.
- Building on existing landscape character and features, a new landscape structure of open spaces, hedgerows, tree belts and woodland will be incorporated into the development to improve the environmental quality, create wildlife habitat, complement the landscape setting as well as promoting connectivity for people and wildlife through enhanced walking and wildlife corridors.
- Enhance existing limited wetland habitat and improve hydrological functioning to increase biodiversity and provide resilience for extreme weather events
- Provide a variety of places to explore and play including imaginative play, forest and meadow habitat and formal play areas.

A Sustainable Place:

- The village layout and infrastructure will ensure a high number of journeys take place on foot, by bike or on public transport.
- Development will be expected to be zero carbon- incorporating energy efficient buildings and renewable energy technologies.
- Stipulate that all new building conforms to a sustainable construction code of practice.
- Low carbon individual transport options are to be provided including EV car and EBike charging. Facilities for bike hire are to be included in park and ride areas.
- Grey and rainwater harvesting is to be included, in addition to, best practice in water efficiency measures.

A Connected Place:

- The new village will be integrated with the existing routes to Whitchurch Village, Queen Charlton and Keynsham.
- High-quality walking, and cycling, routes will be provided within the village also enhancing links to surrounding settlements, including the Sustrans Route 3, and new links eastwards, through Stockwood Vale to the River Avon.
- Connections to the new orbital route, from the village, to provide access to improved highway infrastructure and Metrobus facilities.
- Accessibility to new park and ride facilities, proposed at Whitchurch Village as part of the orbital package, which may be located on the new village perimeter, and could be integrated with the local centre.
- Roadways through the site to be designed as attractive streets with integrated landscape design, SUDS, parking and services.

A Healthy Place:

- To combat sedentary lifestyles, walking and cycling will be a natural part of the pattern of daily activities through good infrastructure.
- Encourage healthy living through access to the outdoors and safe green routes to local facilities, schools and amenities and an extending network of public rights of way, cycle paths, footpaths and bridleways into the wider countryside.

- Incorporate outdoor growing areas facilitating healthy eating, community interaction and environmental education.
- Provide sports and leisure facilities scaled specifically to cater for the needs of local and surrounding residents e.g.. tennis courts, cricket pitch, bowling green, skate park, stables.

A Social Place:

- Promoting social interaction through walking and cycling routes within the new neighbourhood with a high quality public realm and landscape.
- The neighbourhood and existing communities to sustain local services such as a primary school, secondary school and a local centre.
- To increase activity, the neighbourhood will be permeable, compact and walkable, with attractive public spaces and a mix of uses.
- Provide new employment opportunities through a mix of uses including small scale co-working and studio space supported by high speed digital connectivity and services.
- Provide a range of commercial and community uses within a higher density local centre at an early phase sufficient to create a vibrant place proportionate to the scale of the village e.g.. retail units, cafe, and community centre.

WCH3a Development sub-options

Two broad sub-options have emerged within the preferred locational option.

The first sub-option (1A) seeks to optimise solar gain with roofs facing south so that buildings can generate as much power as possible from the sun with solar panels. It is more formal in its layout of streets and spaces, whilst the second sub-option (2A) is based on the concept of creating neighbourhood clusters and is a more landscape led approach that results in a more organic, softer urban structure. Both sub-options are intended to stimulate discussion and test ideas about their implications. It is likely that the future preferred option will blend elements from both and include other concepts that address other opportunities. Comments are therefore invited on these two sub-options and consideration of the following questions might help to facilitate or shape comments:

- Which aspects of these sub-options are important?
- What other aspects are missing?
- What other sub-options for development could be considered?
- What considerations need to be taken into account in considering the distribution of land uses?

6.8 Development sub-options

6.8.1 There are also sub-options that principally relate to the distribution of land uses throughout the development. These explore issues such as where the schools go, and where local centre should be located. The distribution of land uses throughout the development will be considered in more detail as the Strategic Planning Framework evolves into a more detailed masterplan for the development of the area.

6.8.2 Together with the Strategic Design Objectives, these options will be used as the basis for further exploration with stakeholders about the proposed boundary of the development area (and therefore the revisions to the Green Belt boundary), the allocation of the site and the planning policies required to achieve the high quality of development that is aspired to. This will inform the next stage of the Local Plan. Further details are provided in the Emerging Strategic Planning Framework.

Sub-option 1A - seeks to optimise solar gain

Sub-option 2A - based on the concept of creating neighbourhood clusters

6.9 Emerging Proposed Policy Approaches

6.9.1 There is a range of emerging policy approaches within the SDL that are explored below. Comments are invited on these emerging approaches. In this context it is important to note that development is not anticipated until approximately 2029 at the earliest, as delivery is dependent on infrastructure being delivered first. Our policy requirements and priorities are therefore likely to evolve over time. So whilst a robust policy framework is essential to ensure we can secure wider objectives, there does need to be sufficient flexibility in the wording to allow this future evolution to be accommodated.

6.10 Housing

6.10.1 A mix of housing types, sizes and tenures will need to be provided in order to best meet the identified housing needs of the wider area and the requirements of a diverse community. The emerging policy approach is outlined in WCH4.

WCH4 Proposed Policy Approach for housing

The new development will comprise a broad range of housing types and sizes to meet both the district wide needs and the requirements of a diverse community, including for self-build housing.

The tenure, housing type and size of the affordable housing provision will be determined in the lead up to a planning application with the Council's Housing Enabling and Development Team. It is expected that affordable housing delivery will include studio, 1 and 2 bedroom apartments, 2, 3 and 4 bedroom houses, specialist provision for older people and /or people with physical disabilities and those with other support needs.

6.11 Economic Development & jobs

6.11.1 Policy 7.2 from the JSP requires employment space at a quantum and of a type to be determined by the Local Plan. It is proposed to include a range of employment floorspace to enable a successful mixed use community that offers opportunity for people to work close to where they live, and which responds to market demands within the wider area.

6.11.2 Whilst it is likely that market demand would support the provision of B2 and B8 employment floorspace, there is also support for the provision of small offices and light industrial workspace with the B1 use class. These uses are considered to be more compatible with the housing led nature of the SDL and environmental constraints of the development area.

6.11.3 There is an opportunity to create a 'digital co-working hub' that provides modern workspaces and meeting rooms for the wider rural community, whilst also providing quick and efficient public transport connections to the larger employment centres. The market acceptability of

WCH5 Proposed Policy Approach for Economic Development & jobs

The proposed policy approach will consider and specify which combination of the following employment uses should be contained within the development area:

- industrial or warehouse/ distribution employment
- small offices and light industrial workspace
- a 'digital co-working hub'

such a concept will depend on the identification of sufficient demand to create a sustainable and viable hub.

6.12 Local Centres

6.12.1 There is a need to ensure the provision of a local centre to support the community and to provide for their day-to-day needs. The Retail Study (2018) identified that a new local centre should be anchored by a modest sized convenience store and the centre should contain between 5-10 units of generally no more than 150sq m gross in size. The Study stated that there should also be a diverse mix of units across Classes A1, A2, A3, A4, A5 and Class D.

6.12.2 The location of the local centre within the development is one that requires further examination. From a commercial perspective there is benefit from a local centre being visible and accessible from the A37 or the new link road to benefit from a wider catchment, however it also needs to be within easy walking distance for different parts of the new community, and for existing communies.

6.12.3 The resolution of this issue will be through the next stage of preparing a masterplan for the wider area which will entail further consideration of the mix and disposition of land uses, and the relationship with the transport measures that need to be implemented. For example, there could be scope to relate the local centre to a redefined Park and Ride, one that is designed to serve local

WCH6 Proposed Policy Approach for Local Centres

Provide a new local centre that is accessible by sustainable modes of transport for the existing communities of Whitchurch Village and Queen Charlton, as well as residents of the new community. The new local centre will either be located within the heart of the new community or be related to the A37 or the new link road between the A37 and the A4.

residents walking and cycling to it, as well as capturing those commuting by car into Bristol.

6.13 Transport

6.13.1 The strategic transport requirements for the development area are set out in JSP Policy 7.2. They are a package of complementary measures that are required to enable development to proceed and to enable a shift to more sustainable

modes of travel. Many of these have been long standing policy commitments that seek to address existing transportation problems in the wider area, whilst increasing capacity in the transport system to enable housing and employment growth to occur.

6.13.2 The new multi-modal link connecting the A4, A37 and the south Bristol link is one of the most significant and sensitive aspects of these requirements, and an Options Assessment Report (OAR) has been produced that looks at the deliverable options for the alignment of this strategic road infrastructure.

6.13.2 It is acknowledged that this route will have a significant impact on local communities, many of whom live in the neighbouring authority of Bristol City Council, but that the strategic benefits to this investment outweigh this impact.

JSP Policy 7.2 (extract)

Provision of key transport infrastructure including;

I. multi-modal link connecting A4, A37 and the south Bristol link road;
II. Park & Ride provision;
III. Metrobus (high quality public transport) route from Bristol on the A4 – A37 link;
IV. pedestrian and cycle connections in all directions which link the site with key services and facilities. These include extending and improving walking and cycling routes to Bristol, Keynsham and to the countryside to the south; and
V. off-site junction improvements including at Hicks Gate.

No dwellings will be completed at the Whitchurch SDL ahead of:

VI. Park & Ride, and
VII. the multi-modal link A4-A37-south Bristol link

The OAR will be available for public consultation durng the same period as consultation on the Local Plan, and there will need to be on-going dialogue with local communities as progress is made.

6.13.3 The strategic road infrastructure is complex and sensitive and will require significant levels of funding to enable its delivery as well as cross boundary working with Bristol City Council. It is a long term project and the timeline below provides an overview of the key stages that need to be undertaken. Its route will need to be safeguarded in the Draft Local Plan to assist in its delivery.

6.13.4 The provision of strategic transport infrastructure is not only a prerequisite for development to proceed, it also has a critical role in placeshaping and in helping to achieve the strategic priorities as set out in the JSP, such as 'ensuring that new development is properly aligned with infrastructure and maximises opportunities for sustainable and active travel' and 'through a place making approach promotes places

of density and scale with a range of facilities and which encourages healthy lifestyles and cultural wellbeing'.

6.13.5 To achieve the wider aspirations for exemplary development it is essential to ensure close collaboration and reconcilliation between transport and planning. This will help to ensure that the eventual site allocation and masterplan for the development is deliverable, achieves the intended objectives, and seeks to mitigate any adverse environmental impacts.

6.13.6 Key challenges that will need to be addressed or reconciled include:

- The importance of avoiding severence between the existing Whitchurch Village and the new community. How do we ensure easy pedestrian and cyclist movement across the new link road without adversely affecting its function as part of the strategic network?
- The opportunity to explore the role and function of the proposed new Park and Ride, and to test the degree to which it is integrated into the new development. Allied to this is the relationhip to Metrobus, and its relationship to the Park and Ride offer. What are their respective roles and the relationship to each other? How do they relate to the communities that they are intended to serve?
- New or enhanced walking and cycle routes are proposed throughout the wider area to encourage a greater shift to active travel and more sustainable travel modes. How can this best be achieved? Is it acceptable to re-prioritise existing vehicular routes in favour of walking and cycling? How do new routes get delivered? What mechanisms or incentives are available to encourage their use?

WCH7 Proposed Policy Approach for transport

The transport proposals proposed in the Local Plan will be a combination of strategic interventions that are required to enable development to proceed, and a number of sustainable transport interventions that seek to enable a greater shift to more sustainable modes of travel.

6.14 Green Infrastructure

6.14.1 One of the key emerging themes that will shape the character and identity for the Whitchuch development is multi-functional green infrastructure.

6.14.2 The area already benefits from a locally highly valued landscape character and biodiverse rich hedgerows and woodlands, which is interwoven with significant heritage assets such as Maes Knoll, the Wansdyke, Queen Charlton Conservation Area, and important medieval and post-medieval field patterns. There are significant opportunties for a wide range of interventions at a variety of scales that can enhance these existing assets and achieve real benefits for people and wildlife, and which will

Green Infrastructure

The concept of green infrastructure (GI) is now firmly embedded in national policy with the NPPF requiring local planning authorities to set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. It defines green infrastructure as a network of multifunctional green space, urban and rural,which is capable of delivering a wide range of environmental and quality of life benefits for local communities.

form a key part of the placemaking framework for the new community. The enhancement of green infrastructure and the extension of access to it, will also be responding to the increased demand placed on our natural open spaces from new development.

6.14.3 Importantly, and unusally for a development of this scale, there is a real opportunity to deliver advanced green infrastructure and environmental projects ahead of built development. This would be subject to securing the necessary resources to undertake such work and achieving community and landowner support.

6.14.4 This opportunity strongly relates to a key aspect of the 'Garden Community Principles' that were outlined above. Undertaken as advanced works before the built development, it helps to set a high bar as to the importance of green infrastructure throughout the development, and raises the level of ambition that we expect the development to attain.

WCH8 Proposed Policy Approach for Green Infrastructure

Multi-functional green infrastructure will be a key theme throughout the new development area, providing significant opportunities to enhance existing assets and achieve real benefits for people and wildlife.

6.14.5 Further work is required to identify the opportunties for green infrastructure interventions, but they would help to achieve the objectives set out in the JSP.

6.15 Education

6.15.1 The education requirement is based on the educational needs generated by the development and an assessment of existing provision, which, as with other infrastructure requirements, will change over time. Based on the provision of 2,000 dwellings at Whitchurch, a new three form entry primary school with 630 places would be required, as will a new 600 place (120 per year group) secondary school with a 160 place (approx.) sixth form. An all through facility taking in the needs of Early Education and Childcare for children under reception age in line with the Childcare Acts of 2006 and 2016 is required.

6.16 Health facilities

6.16.1 The provision of health

WCH9 Proposed Policy Approach for health facilities

Adequate health care provision will be made for the new community, but the location and form of this health care provision is to be resolved.

facilities is an essential consideration when providing the planning policy framework for the new community. However one of the challenges in planning for healthcare needs ten years into the future is that the requirements will change over time. Discussions are underway within the Bath and North East Somerset Clinical Commissioning Group (BaNES CCG) and with colleagues that represent GP and community health facilities in Bristol to ensure that sufficient access to these services is available from the start of any new development and sufficient capacity continues in to the future.

6.17 Zero Carbon & Heat Networks

6.17.1 The development will be a minimum of zero carbon in its energy use, and should aim to feedback energy to the grid. How this is delivered and the technologies available to achieve this will change over the period of policy formulation, scheme consent and then delivery, so it is not possible at this stage to set out the mechanisms through which this is achieved.

6.17.2 Recent technical evidence has identified that there are limited opportunties in the Whitchurch area to support the implementation

WCH10 Proposed Policy Approach for zero carbon

Development in the Whitchurch area will be at least zero carbon, although how this is achieved is yet to be defined as technologies and innovations will change over time.

of a heat network, and there is no opportunity for a zero carbon heat source. The recommended approach is that the carbon savings that cannot be met on site could be delivered through ground mounted renewables in the SDL area, including solar and wind energy. This will be subject to the identification of suitable locations within the area that have capacity to absorb such development.

6.18 Flooding, in particular Groundwater and Surface Water

6.18.1 The key evidence in relation to flooding is the Bath & North East Somerset Level 1 Strategic Flood Risk Assessment Update 2018. This identifies that Whitchurch is located entirely within Flood Zone 1 and is at low risk from fluvial flood risk. Within Whitchurch, areas at surface water flood risk are primarily isolated ponding in open spaces and gardens, though there is some occasional flooding along the road network.

6.18.2 Whilst Whitchurch is located

in Flood Zone 1, developments greater than 1 hectare located in Flood Zone 1 will still require a site-specific Flood Risk Assessment. The flood risk from all sources should also be assessed and mitigated. Development should also be located outside any areas shown to be at current or future risk of flooding where possible.

6.19 Potential for use of Sustainable Drainage Systems

6.19.1 In areas that are at risk of flooding from surface water, development could provide opportunities to reduce this risk through the reduction in impermeable surfaces and use of SuDS.

6.19.2 The SDL is not located within a Groundwater Source Protection Zone and has an area within its boundary designated by the Environment Agency as being a landfill site. It runs along the back of the Witheys and Dene Road. A thorough ground investigation will be required as part of a detailed site-specific Flood Risk Assessment to determine the extent of the contamination and the impact this may have on SuDS. As such, proposed SuDS should be discussed with the relevant stakeholders (LPA, LLFA and EA) at an early stage to understand possible constraints.

6.19.3 Source control techniques are likely to be suitable for this development. The infiltration potential mapping indicates that most of Whitchurch is probably compatible for infiltration SuDS. As areas of the site have been designated as historic landfill, further site investigation should be carried out to assess potential for drainage by infiltration.

6.20 Next Steps

6.20.1 The next steps towards the successful delivery of a new community at Whitchurch is dependent on the resolution and coordination of many complex factors. Without this, it will simply not be possible to achieve the placemaking aspirations set out above. A successful community will only be possible with:

- a strong and clear policy framework,
- a robust delivery and funding programme that ensures that the necessary infrastructure is provided
- the commitment and alignment of landowners and developers
- the support of the local community and key stakeholders
- political and corporate leadership.

6.20.2 To ensure that all of the required infrastructure is delivered and that each development phase contributes to its proportionate share, it is essential that a Comprehensive Masterplan and an Infrastructure Delivery Plan for the whole of the development area is prepared and agreed by the site promoters before any development can be granted planning permission. This is to ensure that all the required infrastructure is delivered in a consistent, cohesive and proportionately fair way, regardless of landownership or phasing.

Brislington Park & Ride

6.21 Relocation of Brislington Park & Ride

6.21.1 The West of England JSP proposes development at a number of Strategic Development Locations (SDLs) in order to help provide the housing required up to 2036. The SDLs include Land at Bath Road, Brislington on land within the Bristol City Council administrative area providing for mixed use development including around 750 new homes. In order to facilitate this development relocation of the existing Park & Ride on the A4 at Brislington is required, thereby releasing the land for development. The JSP proposes that the Brislington Park & Ride is relocated further out from Bristol on land near to the Hicks Gate roundabout. In relocating it the opportunity will be taken to expand the Park & Ride site provision thereby facilitating modal choice and intercepting a greater number of car journeys bound for Bristol city and primarily the city centre.

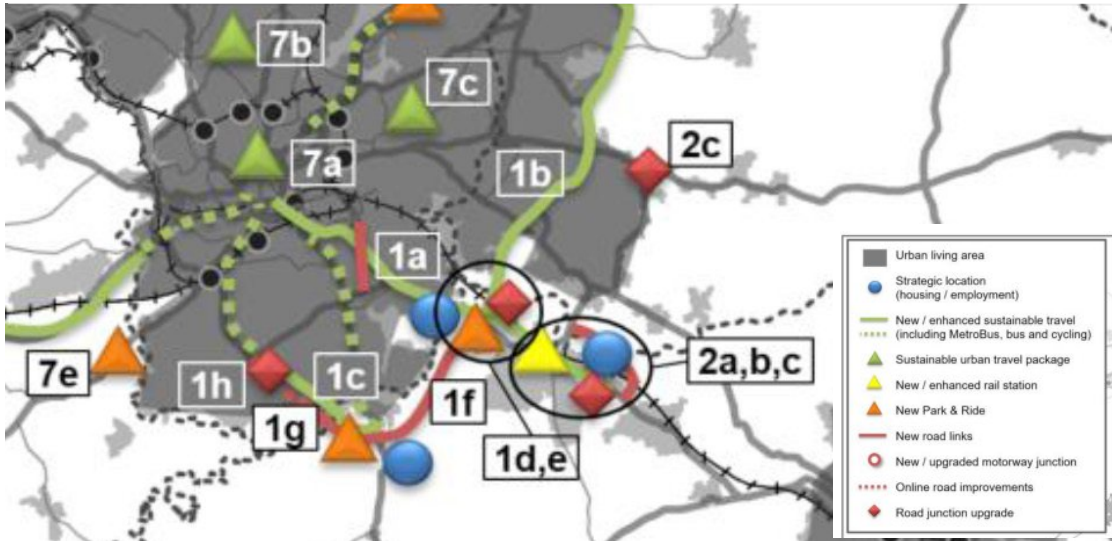
6.22 Strategic Issues

6.22.1 Some initial assessment of potential locational options for the relocated Park & Ride has been undertaken through the South East Bristol and Whitchurch Transport Package Options Assessment Report. Relocation of the Park & Ride is part of an overall package of transport interventions, also including the introduction of MetroBus on the A4, which will manage and mitigate travel demand on this busy transport corridor. These are shown on the diagram below which sets out the strategic transport programme which supports the Joint Spatial Plan.

6.22.2 In the Options Assessment Report the two locational options shortlisted for further assessment are on land to the south west of Hicks Gate roundabout and these are shown on Diagram 42.

6.22.3 The location of the relocated Park & Ride is also related to the route of the multi-modal link connecting the A4, A37 and South

Diagram 41 - West of England Transport Programme (JSP Transport Topic Paper April 2018)



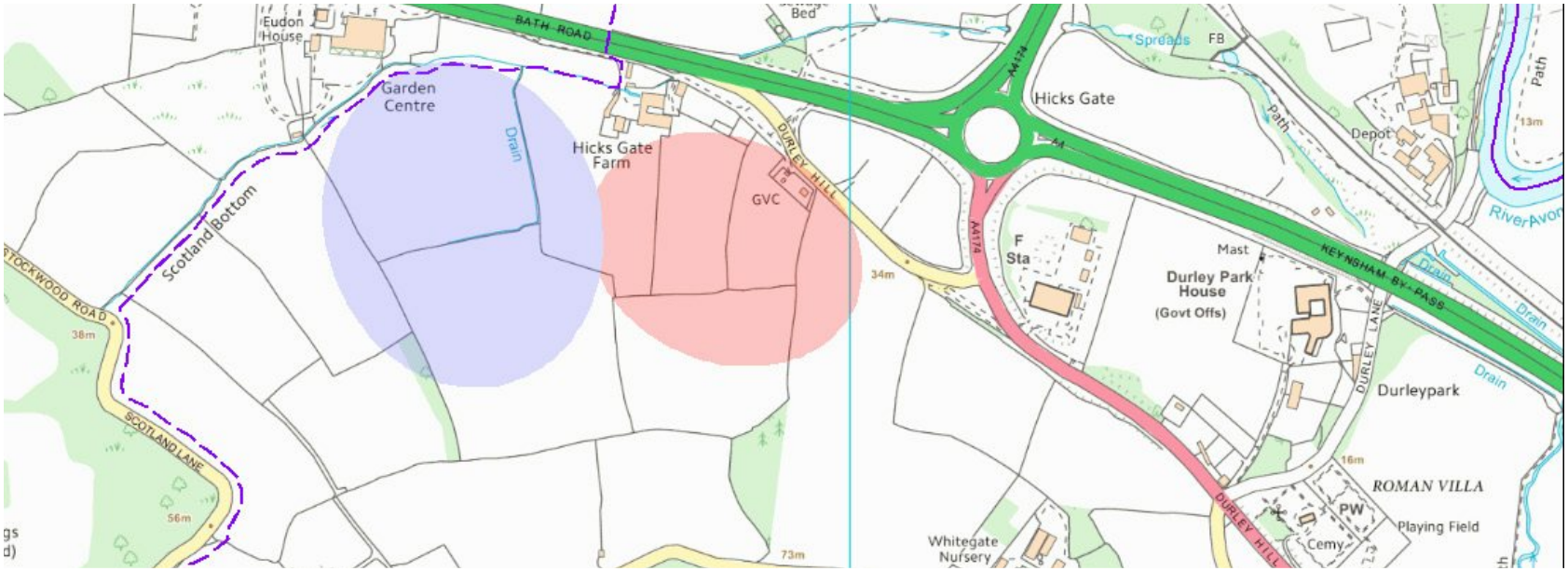


Diagram 42 - Broad Options for the relocated Brislington Park & Ride (Options Assessment Report)

Bristol link road (see Diagram 41).

6.22.4 More detailed assessments will need to be undertaken to determine the most appropriate location for the Park & Ride from an operational perspective and in terms of environmental and other impacts. Appropriate connections to the Brislington SDL, A4-A37 multi-modal link road and Keynsham, including pedestrian and cycle links, will need to be identified. The Joint Spatial Plan establishes the principle and the 'exceptional circumstances' for the need to change the Green Belt boundary to accommodate the Strategic Development Locations but the more detailed impacts on the Green Belt will also need to be considered. The Draft Local Plan will set out a policy framework to facilitate its delivery, whilst also ensuring impacts are properly considered and mitigated.

6.22.5 As set out above the strategic development at Brislington proposed in the JSP lies within the Bristol City Council administrative area. Allocation of this land for development in the Bristol City Council Local Plan will also require land to be removed from Green Belt and new detailed Green Belt boundary defined. Dependent on the location of the new Green Belt boundary it will be defined in the Bristol Local Plan where it lies within the Bristol City Council area, and in the B&NES Local Plan where it lies within the B&NES area. Through

the Duty to Co-operate the two authorities will work closely together on this issue, as well as planning for the SDL and the re-located Park & Ride.

6.23 Policy Approach

6.23.1 Subject to further investigations outlined above and identifying the preferred location the B&NES Local Plan will need to formally allocate a new Park and Ride site, defining its boundary and the revised Green Belt boundary.

WCH11 Policy Approach for the Relocation of Brislington Park & Ride

Identify the most appropriate location to relocate the Brislington Park and Ride and allocate in the Local Plan, including the revised Green Belt boundary

7. Somer Valley

7.1 Context

7.1.1 The Southern part of the District, with its range of distinctive history, characteristics, identities and communities makes a strong contribution to the overall character of the District. The current planning policy framework in the Core Strategy and Placemaking Plan (PMP) for the Somer Valley seeks greater self-reliance, facilitated by economic revitalisation in light of the past loss of employment opportunities and the resultant high levels of out-commuting. Pivotal to this is the designation of the Somer Valley Enterprise Zone to increase employment provision. The area has not been earmarked as an appropriate location for strategic new housing growth.

7.1.2 The Somer Valley Area as defined in the Core Strategy includes Midsomer Norton, Westfield, Radstock, Peasedown St John, Paulton, Shoscombe, Camerton, Timsbury, High Littleton and Farrington Gurney.

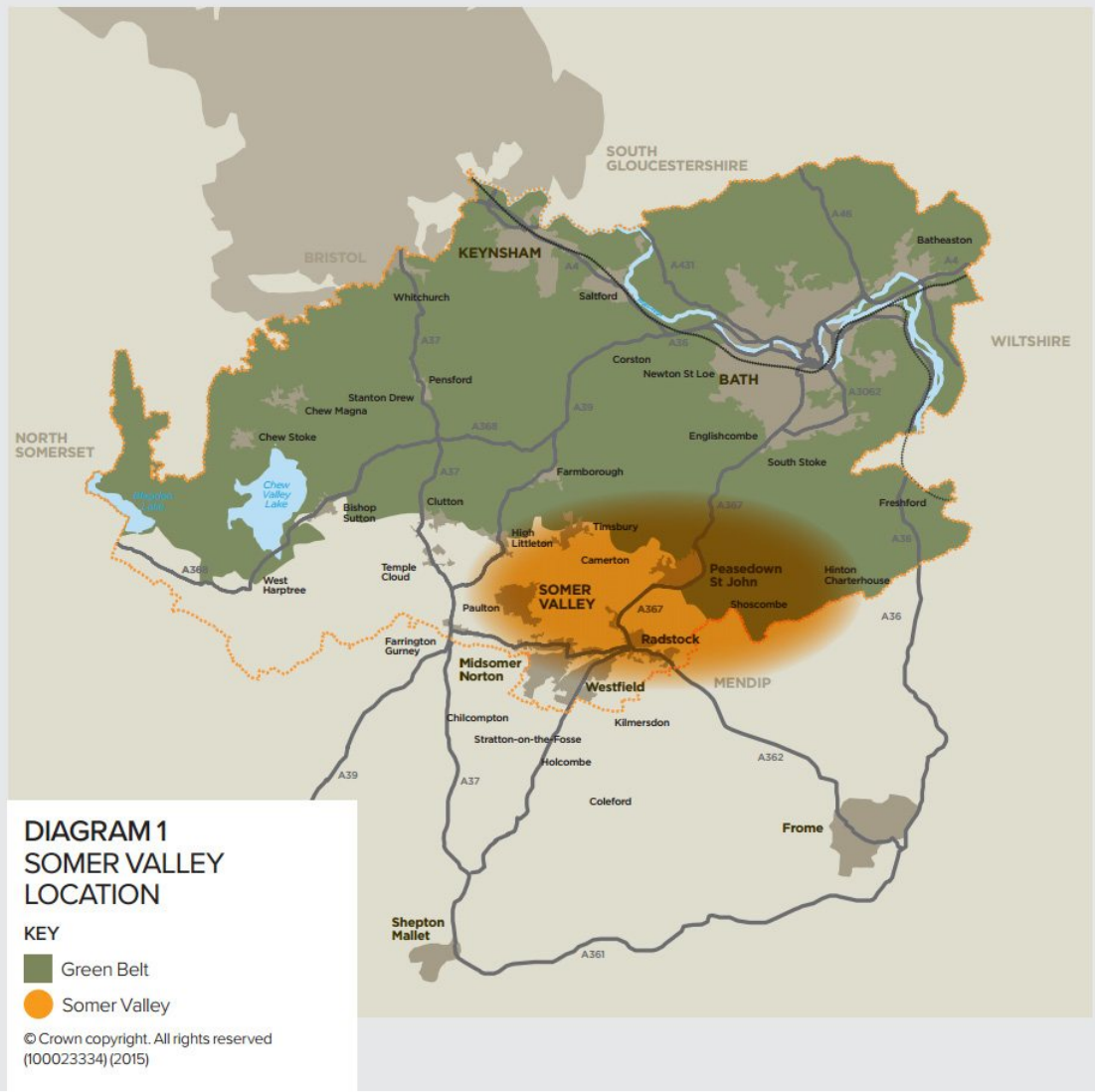


Diagram 43 - Somer Valley Location

Current Vision for the Somer Valley

The southern part of the District will become more self-reliant, facilitated by economic led revitalisation alongside local energy generation, building on its industrial expertise and improving skill levels. Transport connections to other centres, as well as connections between settlements within the Somer Valley area will continue to be improved. The roles of Midsomer Norton and Radstock Town Centres will be complementary, providing key employment opportunities, services and leisure provision to the communities in the Somer Valley area. Midsomer Norton town centre will continue to be the principal centre with an improved public realm and enhanced townscape and a Town Park. Radstock will continue to provide a focal point for local communities and realise its potential for tourism based on its green infrastructure, mining heritage, cycle ways and attractive rural hinterland. Villages of the Somer Valley will continue to provide for the needs of their local communities.

7.2 Strategy, evidence and policy review

7.2.1 The West of England Joint Spatial Plan continues the current approach in the Core Strategy of not identifying the Somer Valley for strategic housing growth in the interests of sustainability. The focus will continue to be on economic revitalisation and encouraging job creation, although some additional housing will be unavoidable as set out in the options in the spatial strategy section in Chapter 3.

7.2.2 In addition, since the adoption of the Core Strategy and PMP, Westfield Parish Council has produced a Neighbourhood Plan which has been adopted as part of the Development Plan by the Council. The Westfield Neighbourhood Plan sets out the vision and objectives for the Parish with associated planning policies. Midsomer Norton Town Council is also preparing a Neighbourhood Plan. The Council will work with the Parish and Town Councils to ensure that the vision and objectives of the Local Plan and Neighbourhood Plans are aligned.

7.2.3 In order to inform the review of the spatial strategy and to help identify the key issues which the Local Plan should address, the section below summarises the existing policy approach in the adopted Core Strategy, outlines delivery to date, updates the evidence and describes subsequent changes.

7.3 Employment land

7.3.1 Current Policy:

- Enable the delivery of around 900 net additional jobs between 2011 and 2029.
- Encourage the retention and expansion of local companies and the growth of new businesses by making provision

for the changes in employment floorspace set out below: Office floorspace: from about 31,000m2 in 2011 to about 33,700m2 in 2029 Industrial/ Warehouse floorspace: from about 126,400m2 in 2011 to about 112,000m2 in 2029.
- New employment floorspace will be focused at the Westfield Industrial Estate, Midsomer Enterprise Park, Bath Business Park in Peasedown St John, Old Mills in Paulton (including Somer Valley Enterprise Zone) and Midsomer Norton and Radstock Town Centres

7.3.2 Changes since 2011

- Employment monitoring shows a net increase of 365 jobs in the Somer Valley between 2011 -2016, the second highest employment growth rate across B&NES.
- A net loss of office floorspace of 486 m2 up to 2017/2018
- A net loss of Industrial floorspace of 7,228 m2 up to 2017/2018
- The area experienced a rebalancing in the labour market with retractions in employment in manufacturing (previously the largest employment sector) which has now been overtaken by retail and health and social care.
- Designation of the Old Mills employment allocation as the Somer Valley Enterprise Zone.

7.3.3 Key Issues

- The Somer Valley Enterprise Zone provides a long term supply of new employment land aimed at increasing employment opportunities in the area challenging the high levels of out-commuting. The delivery of this site is an essential part of the strategy.
- There are other smaller employment sites in and around the Somer Valley area which would benefit from protection from loss to other non-employment uses.

7.4 Housing

7.4.1 Current Policy:

- Enable around 2,470 new homes to be built at Midsomer Norton, Radstock, Westfield, Paulton and Peasedown St John by 2029.

7.4.2 Changes since 2011

- The 2018 B&NES Monitoring Report shows steady housebuilding rates since the start of the plan period in 2011 and there are around an additional 1,120 dwellings currently projected to be built by 2029.
- The redevelopment of Radstock Railway Land is largely complete
- Planning permission has been granted for a new health centre in Radstock town centre

7.4.3 Key issues

- The current policy seeks to mitigate the ongoing increase in the imbalance between jobs and homes by constraining

the scale of new housing development and creating more jobs. However, in light of national policy on the need to increase housing supply and the requirements of the JSP, it is necessary to consider some further housing provision.

- The JSP proposes a requirement for 14,500 dwellings across the district which includes 'non-strategic' growth of 700 dwellings. National policy makes it clear that land can only be removed from the Green Belt and allocated for development if warranted by 'exceptional circumstances'. As over 70% of the B&NES area is covered by the Green Belt, it is necessary to consider the scope for new housing development in the Somer Valley.

7.5 Retail and town centres

7.5.1 Current Policy:

- Strengthen the shopping offer in Midsomer Norton town centre, with a focus on the southern end of the High Street, to serve the Somer Valley by facilitating redevelopment and improving the public realm. This includes allocating town centre redevelopment sites such as at South Road Car Park for retail and the business quarter for mixed use development providing active frontages onto the High Street
- Enable Radstock centre to continue to provide local needs and support specialist shops.
- Protect and enhance the local centres at Westfield, Paulton, Peasedown St John and Timsbury
- Identification and protection of the Town Park site in Midsomer Norton

7.5.2 Changes since 2011

- Midsomer Norton's retail ranking has dropped slightly to 1,325th. The vacancy rate for Midsomer Norton is just over 10% and 16.7% for Radstock compared to a national average of 11%.
- The Retail Study 2018 concludes that there is no longer a combined quantitative need for additional convenience goods floorspace across Midsomer Norton and Radstock. Previously, there was a forecast quantitative need of between 2,000sq m and 3,000sq m net, however this has now dropped to 300sq m – 400sq m net.
- Whilst there is no longer a quantitative need for a large amount of additional convenience floorspace, further provision can help to reinforce the health and attractiveness of Midsomer Norton town centre and generate demand.
- In terms of bulky goods shopping, the household survey indicates a significant level of residents from Midsomer Norton and Radstock travel to stores and centres outside of the B&NES area.
- Implementation of the Midsomer Norton Town Park has begun.

7.5.3 Key issues

- There is a qualitative case and operator demand for a new food store in Midsomer Norton. A Town Centre site is preferable in order to reinforce the health of the town centre. The implications for town centre car parking provision will need to be taken into account
- The existing approach of focusing investment on the southern part of the High Street should be continued and there is scope in particular to investigate opportunities in The Hollies area of the town centre
- A greater proportion of Radstock residents travel to Midsomer Norton for their convenience goods shopping, which is also the case for some categories of comparison goods. However, no doubt heavily influenced by the goods range in the Radco store, Radstock has a reasonably good market share in domestics appliances, household and DIY goods. However, the market share of Radstock town centre for convenience goods continues to fall.
- The need to retain a network of town and local centres remains.
- There is scope to enhance recreational facilities through the designation of a Leisure Park in Midsomer Norton (see map below)

7.6 Historic and Natural Environment

7.6.1 The Current Policy includes:

- Sustain and enhance the significance of the areas' heritage assets and their settings, including listed buildings, the conservation areas, archaeology and scheduled ancient monuments, as well as non-designated heritage assets of local interest and value.
- Strengthen the green links between the two town centres and the rest of the Somer Valley via a cycle and walking link along the route of the former railway as part of the Town Park and Five Arches route proposals.
- Protect and enhance the distinctive character of the area including the landscape setting of the settlements and built and historic environment.
- Conserve the town centre's heritage and unique townscape character in Midsomer Norton
- Protect and enhance heritage assets: The built form should retain its historical and architectural value and development should attempt to integrate these features and carefully consider materials appropriate to the locality and building style.

7.6.2 Changes since 2011:

- The three conservation areas on the Historic England at Risk Register include Midsomer Norton and Paulton. The recent review of the boundary of Midsomer Norton Conservation Area has been undertaken and up to date character appraisals and management proposals prepared, which is the first step in seeking to address this 'at risk' status. The same needs to

be undertaken for Paulton when resources permit.

- The new NPPF states that the Plan should set out a positive strategy for the conservation and enjoyment of the historic environment. The Historic Environment Topic Paper considers the importance of the historic environment in this area and the existing and further work by which the planning system can facilitate its conservation, enhancement and enjoyment by all.
- Midsomer Norton Town Park has started to be implemented

7.6.3 Key challenges:

- Continue to assess and protect the significance of all heritage assets, including listed buildings as part of any proposals.
- Sustain and enhance the area's historic and natural environment in allocating sites for development, drawing particular attention to heritage assets and their setting and also biodiversity.
- Continue to undertake the review and appraisal of conservation areas when resources allow and in partnership with others.
- Continue to work with partners to resolve heritage assets at risk and greater recognition of local heritage assets.
- Protect and enhance areas of visual significance and views to the open landscape, in light of their close relationship with the history of the towns, in particular Radstock.

7.7 Transport

7.7.1 Some of the key issues identified in the **Draft Somer Valley Transport Strategy** include high traffic volumes through built-up areas; high levels of out-commuting; local peak period traffic congestion; narrow footways and limited pedestrian crossing facilities in some areas; relatively long bus travel times and bus fares perceived to be high; no direct access to the rail network; and limited spare parking capacity in town centres. These issues were also raised through community consultation on Westfield Neighbourhood Plan, which highlighted the issues of on-street parking in residential areas and concerns regarding impacts of congestion on the A367 on air quality within the Parish and wider area.

7.7.2 These issues need to be taken into account in the review of the planning policy framework.

7.8 Spatial Priorities for the Somer Valley

7.8.1 Based on the above analysis, the key priorities to be addressed in the Somer Valley are set out below. These will inform a reviewed/ refreshed vision and strategy.

- Increase employment opportunities by delivering the planned additional employment floorspace in the Somer Valley Enterprise Zone and provide greater protection of existing office and industrial space
- Responding to the JSP, identify potential new housing sites to accommodate between 300 and 500 new homes. This could

include options in Mendip District if appropriate.

- Promote, conserve and where possible enhance the distinctive landscape setting and natural environment of the Somer Valley, focusing on the role of the Somer Valley area as a strategic Green Infrastructure link between the Mendip Hills and Cotswolds AONBs
- Maintain the health of town centres for both Midsomer Norton and Radstock. In Midsomer Norton in particular to focus on the southern part of the High Street
- Align planning priorities with those in the Draft Somer Valley Transport Strategy
- Seek to ensure new housing is properly aligned with new infrastructure, both transport and social and community facilities
- Enhance the recreational facilities to meet the needs of the growing population
- Provide a focus for recreational facilities through the designation of a Leisure Park in Midsomer Norton.

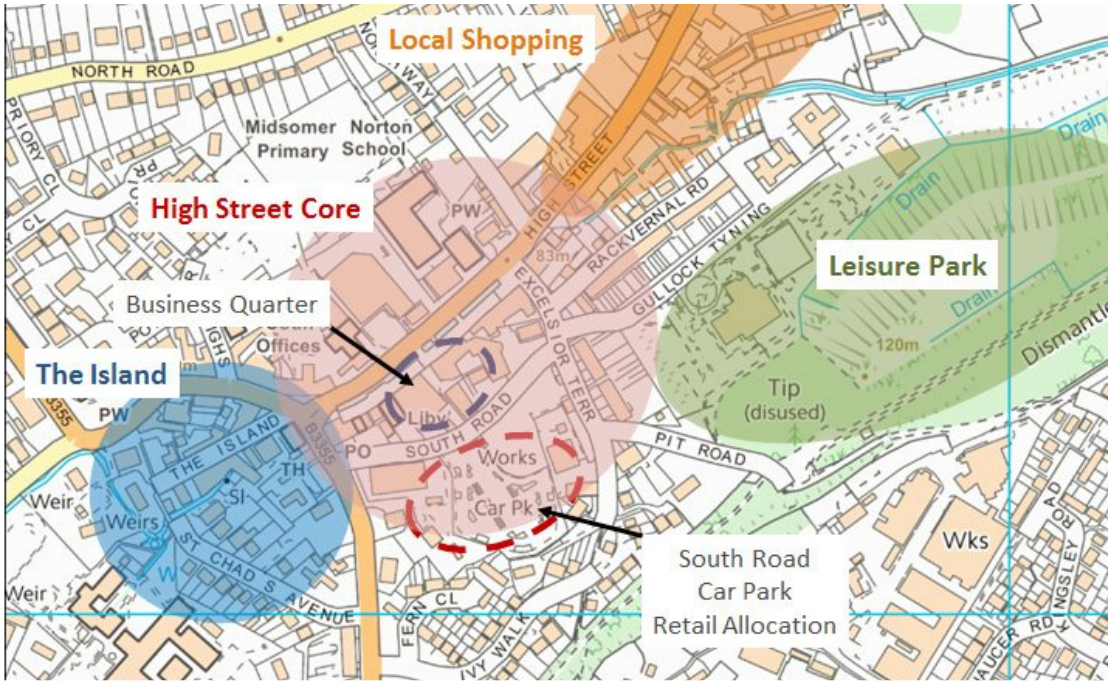


Diagram 44 - Proposed functional Zones in Midsomer Norton Town Centre

7.9 Strategy and Policy options

7.9.1 In light of the above, there are the three broad policy areas to focus on:

- Employment land
- Housing Land
- Retail and town centres

Employment: Somer Valley Enterprise Zone (EZ) Options

7.9.2 Given economic restructuring in the area and high levels of out commuting it is important that the Local Plan maintains present levels of employment through retention of existing key employment sites and

facilitates job growth through the provision of new employment sites. The retention of existing employment sites is addressed in the section on Economic Development Management Policies in chapter 8 of this document.

7.9.3 The Somer Valley Enterprise Zone (EZ) is the flagship development site for promoting and delivering new business space and job growth in the local area. The Council has signed a Memorandum of Understanding with the West of England Local Enterprise Partnership and Central Government

SOM1 Policy Approach for the Somer Valley Enterprise Zone

Extent of the site – land in the south eastern corner of the EZ (marked in red in the diagram below) is currently not included in the site allocation due to previous availability/deliverability concerns. It is likely that allocation of this land would help deliver sustainable transport links and improvements to the A362 which is an important transport link for the Somer Valley. This would assist in achieving full build out of the EZ.

Land use mix – a review of the market suggests that a wider range of commercial uses on the site would have significant benefit for the site's viability. Therefore, including higher value uses, with a road frontage, would help to facilitate to delivery. The current Placemaking Plan policy already references builders merchants/ car showroom uses on the site. Additional land use options to be considered include large format or bulky goods retail (not including a food store), hotel and A3 uses (to support employees/business uses on the site) and an element of A3/A4/A5 roadside uses.

which commits B&NES to 'use all reasonable endeavours to promptly obtain necessary permissions to deliver the Enterprise Zone'. The current approach that focuses solely on delivering industrial uses is no longer commercially appropriate or viable. Delivery would be facilitated through the Local Plan by testing a number of key issues including revisions to the site boundary and a wider mix of uses. In doing this, it is necessary to ensure that the EZ options sit within the context of the wider Somer Valley strategy and implications for other parts of the area.

7.9.4 In considering a wider mix of uses for the EZ (see SOM1) it will be important to assess the implications for and impacts on the existing town and local centres in order to ensure harm to the centres (particularly Midsomer Norton town centre and Paulton local centre) is avoided. Inclusion of other land uses must also ensure the EZ is still capable of delivering the necessary employment/business space required to meet the employment growth needs of the area. In addition the trip attraction/transport impacts of the potential inclusion of retail and other non- industrial uses such as hotel and A3 uses also need to be understood. This might have implications for the Draft Somer Valley Transport Strategy.

Housing

7.9.5 The JSP requires 14,500 dwellings to be accommodated in B&NES up to 2036. This includes a non-strategic component of 700 dwellings. The options to facilitate the non-strategic growth are presented in chapter 3. As the southern part of the District is not covered by the Green Belt, all three options include some level of new housing in the Somer Valley area.

7.9.6 Non-strategic growth is in addition to extant supply of 1,120 new homes. This will entail a review of existing site commitments, as well as investigation of options outside the Housing Development Boundary.

7.9.7 The B&NES Housing and Economic Land Availability Assessment (HELAA) 2018 identifies a number of potential housing sites. The suitability of these sites for development is currently being assessed. The options in Chapter 3 include one which focuses the non-strategic new housing in the Somer Valley (just under 500 dwellings) or includes the Somer Valley as part of a more dispersed approach (around 300 new homes). These are shown in diagrams 4 and 5 in Chapter 3. This would entail;

- Maximising the use of brownfield sites not already allocated
- Intensifcation of existing urban areas where appropriate e.g. redeveloping suplus garage sites.
- Review and more intense use of existing allocation sites.
- New greenfield sites as a last resort

New Housing Policy Options

See Options 1 (SS1) and 2 (SS2) in Chapter 3 of this document.

7.9.8 Any increase in the housing supply in the Somer Valley must be aligned with the necessary infrastructure such as health facilities.

Town centres and retail provision

7.9.9 Nationally, smaller town centres, such as Midsomer Norton and Radstock are under increasing pressure, as many retailers are reducing high street presence and focusing on larger centres and strategic locations.

7.9.10 The 2018 Retail Study suggests the market share of both town centres is reduced. The forecasts of future expenditure to support retail floorpace are also lower than those informing the Core Strategy. It also confirms that Midsomer Norton Town Centre continues to act as the predominant town centre in serving the wider area.

7.9.11 The current strategy is to maintain and enhance Midsomer Norton and Radstock town centres.

At **Midsomer Norton**, which is the market town for the area, the strategy is to focus on the retail core at the southern end of the High Street. In light of the updated evidence on retail need and the ongoing interest in the town centre for further food retail, the current retail allocation at South Road Car Park (SRCP) is proposed to be retained. However, the implications for the Draft Somer Valley Transport Strategy need to be considered in light of its requirement for no reduction in public car parking capacity. This will need to be informed by a car parking survey alongside a review of parking in Midsomer Norton and the Somer Valley as a whole.

7.9.12 Within the context of these car parking issues there may be a need to review allocation of South Road Car Park for food retail. Following the review if the food retail capacity of the site is reduced and the limited quantitative need for further food store floorspace outlined on page 119 above is still to be met, the NPPF sequential test will need to be followed:

- any alternative town centre sites, then
- edge of centre sites and then,
- out of centre options at well connected locations in the area.

7.9.13 Provision of additional high street comparison floorspace would also need to be facilitated on a sequential basis. Other than additional provision in the town centres through more efficient use of existing units/premises there appears to be limited demand or scope to increase supply. For large format or bulky goods retail (not including a food store), it appears that there are no suitable town centre sites, therefore edge of centre and out of centre (e.g. the EZ) opportunities need to be considered.

7.9.14 In **Radstock town centre**, since the adoption of the Core Strategy, there has been an increase in retail floorspace in the town centre (e.g. the Railway Land, Charlton World of Wood site). Planning permission has been granted for the new health centre and there are also proposals to redevelop the Radco store site for a greater mix of uses. There are also other potential town centre

SOM2 Proposed Policy Options/Approach for town centres and retail provision

Midsomer Norton Town Centre
To continue the role of Midsomer Norton Town Centre as the area's principal retail centre with a focus for investment at the southern end of the High Street, retaining the foodstore allocation at South Road Car Park and the Business Quarter allocation. Review car parking provision.

Radstock Town Centre
Facilitating appropriate change in central Radstock whilst ensuring retention of its role as a town centre. Review car parking provision.

Westfield Local Centre
Retain and enhance the local centre at Westfield.

redevelopmet opportuities e.g. library site. Alongside this the 2018 retail study indicates a moderate shrinkage in the demand for retail in the town. The proposed strategy is therefore to retain the role of Radstock as a town centre, although this might entail an adjustment in its offer.

7.9.15 **Westfield** Neighbourhood Plan supports the renovation of the existing local shops at Elm Tree Avenue. The proposed strategy is to continue to maintain and enhance this area as a local centre.

7.9.16 Other policies in the Core Strategy/Placemaking Plan will also need to be reviewed. The table below sets out the existing Somer Valley policies indicating in bold those policies subject to a review in this document and the proposed approach for the remaining policies. Where there is no change in circumstances to warrant significant policy review, it is proposed to take the existing policies forward with only amendments for clarification (in the light of best practice, updated guidance etc.) as indicated in the

SOM3 Review of existing Somer Valley policies

Please make sure you specify which site you are commenting on when responding.

tables below. Policies will be presented in full in the Draft Local Plan and are likely to be renumbered at this stage.

Policy SV1 Spatial Strategy

Proposed approach: Revised approach is discussed earlier in this chapter.

SV2 Midsomer Norton Town Centre

Proposed approach: Approach is discussed earlier in this chapter.

SSV1 Central High Street Core

Proposed approach: Approach is discussed earlier in this chapter.

SSV2 South Road Car Park

Proposed approach: Approach is

discussed earlier in this chapter.

SSV3 Midsomer Norton Town Park

Proposed approach: 14/01020/FUL Application for a change of use from agricultural land to town park was permitted in 2014 and progress has been made led by Midsomer Norton Town Council. 16/05424/RES Planning permission for 35 dwellings was permitted in 2017. Amendment to the Town Park and Housing Development Boundary is necessary.

SSV4 Former Welton Manufacturing Site

Proposed approach: 16/02607/OUT permitted in April 2018. Mixed use redevelopment for employment (including light industrial/office B1 and B2 uses, A1, A3 and A4 retail uses including a convenience store and public house and A5/C1 uses including a hotel); institutional uses (C2 and D1) and residential uses (market and affordable C3 uses) including approximately 3,730 m2 of employment development and 200 housing units and associated car parking, landscaping and roads/links. No amendments currently proposed - policy remains relevant and fit for purpose.

SV3 Radstock TC

Proposed approach: Approach is discussed earlier in this chapter

SSV14 Charlton Timber Yard

Proposed approach: Scheme complete as permitted under application (17/00120/FUL). Therefore, this allocation is proposed to be deleted in the Local Plan.

Ryman Engineering Services

Proposed approach: 17/05597/FUL: 10 dwellings permitted. No amendments currently proposed - policy remains relevant and fit for purpose.

SSV17 Former Radstock County Infants

Proposed approach: No amendments currently proposed - policy remains relevant and fit for purpose.

SSV20 Former St Nicholas School

Proposed approach: No amendments currently proposed - policy remains relevant and fit for purpose.

SSV18 Somer Valley Campus

Proposed approach: Application for skills centre permitted. As the scheme has not been implemented it is proposed thaat the policy is retained at this stage as it remains relevant and fit for purpose.

SSV11 St Peter's Factory site SB7B

Proposed approach: 14/04003/OUT permitted. for the erection of 81 no. residential dwellings. No amendments currently proposed - policy remains relevant and fit for purpose.

SSV9 Old Mills Industrial Estate

Proposed approach: Approach is discussed earlier in this chapter.

8. Development Management

8.1 Setting the scene

8.1.1 The policies in the Core Strategy and the Placemaking Plan provide the principal planning policy framework for determining planning applications and appeals. The preparation of the new Local Plan provides the opportunity to formally combine the adopted Core Strategy and Placemaking Plan into one Local Plan.

8.1.2 The policies in the Placemaking Plan were found 'sound' in July 2017, so the majority of policies can be taken forward into the new Local Plan unchanged or with minor amendments. However, there are a number of policies areas that need reviewing or new policies drafted in the context of the following:

- emerging West of England Joint Spatial Plan which provides the new strategic planning framework for the Local Plan and covers the same period, 2016 - 2036
- changes in national policy guidance or legislation
- problems in implementing a policy
- updated evidence

8.1.3 The policy areas discussed in this section are under the following headings:

Climate Change
Housing
Employment
Fast food takeaways
Parking standards and electric vehicle infrastructure
West of England Green Infrastructure
Plan and Local Plans
Viability

8.1.4 In addition there are other policies that would benefit from some minor wording amendments, clarification or regrouping without materially changing the policy direction and therefore do not necessitate a full review. Annex 1 at the end of this section lists all policies from the Core Strategy and the Placemaking Plan together with a commentary on how these are intended to be taken forward in the Draft Local Plan. Through this consultation there is opportunity to comment on the proposed approach for each policy.

8.2 Next steps

8.2.1 Guided by the outcome of this consultation and any other material considerations, we will be seeking your views on detailed draft policies, including those listed in the Annex, at a later stage as part of the Draft Local Plan.

8.3 Climate Change: Carbon Reduction

Setting the scene

8.3.1 The cross cutting objective of the Local Plan is to pursue a low carbon and sustainable future in a changing climate. Policy 5 in the emerging West of England Joint Spatial Plan (JSP) seeks to 'Minimise energy demand and maximise the use of renewable energy, where viable meeting all demands for heat and power without increasing carbon emissions'. The combined West of England CO2 reduction target is to reduce absolute CO2 emissions by 50% by 2035 from a 2014 baseline.

8.3.2 The JSP recognises the potential for development to be built to a zero carbon standard, that is net zero emissions from regulated and unregulated heat and power. The JSP states that this will be investigated using a consistent methodology across all four Unitary Authorities to inform the production of the new Local Plans and supporting SPDs.

Carbon Reduction Requirement Study

8.3.3 The West of England Authorities have jointly commissioned a study to identify the cost of achieving various levels of carbon reduction to set the strongest viable energy requirements for development to be included in new Local Plans.

Key findings

8.3.4 The study found that reducing regulated emissions to zero through a policy approach which reflects the energy hierarchy (see Diagram 45) would result in a 5-7% cost uplift. Achieving net zero regulated and unregulated emission is likely to result in a cost impact of 7-11% for homes.

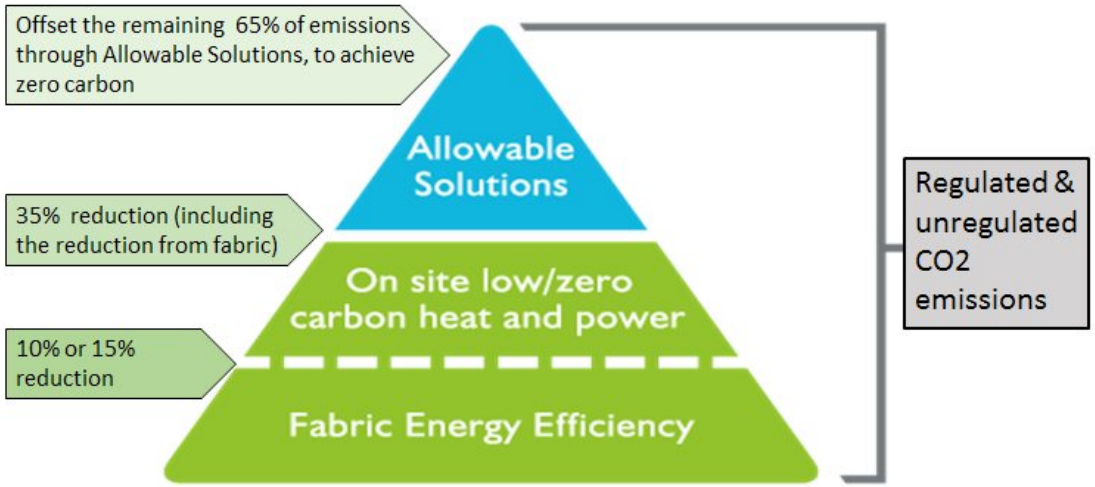


Diagram 45: The Energy Hierarchy

8.3.5 The study also sets out options for reviewing the policy approach in response to the transition of the electricity grid to renewables. In recent years the mix of generation sources used to provide electricity through the national grid has changed significantly. The contribution of renewable energy has risen from under 5% in 2004 to over 30% in 2018. This trend of "grid decarbonisation" is set to continue in the coming decades. Soon, electricity is likely to produce less carbon per unit than gas, which will encourage developers to switch away from gas heating and towards renewable heat. Decarbonisation will require an update to Building Regulations, expected in 2019. Since the proposed carbon reduction approach uses Building Regulations compliance as a baseline, when Building Regulations change the policies will also need to be reviewed.

8.3.6 For major non-domestic development, in addition to carbon reduction requirements,

DM1 Emerging policy approach for carbon reduction:

Development will be required to achieve zero regulated and unregulated carbon emissions from a combination of energy efficiency on site carbon reductions and allowable solutions reflecting the energy hierarchy:

1. **Use less energy: Minimum 10% reduction in regulated CO2 emissions through fabric performance.** Rationale: The best opportunity to improve building fabric is at the development stage. Post-occupation it is more costly and disruptive to improve the fabric. Many building fabric components will last the lifetime of the building providing long term carbon savings. Fabric improvements can deliver higher quality buildings which are healthier to live in and cost less to run. A 15% improvement will be considered for non-residential development since the evidence shows it is more cost effective for non-residential development to achieve energy efficiency savings.
2. **Use clean energy: Minimum overall 35% regulated CO2 reduction through onsite measures including renewable energy and a heat hierarchy to reduce dependence on gas.** Rationale: Generating renewable energy on-site helps meet the renewable energy target in Policy CP3 and can reduce energy bills for building users. Renewable energy can be stored, e.g. with batteries, to support the transition of the electricity grid to renewable energy by releasing energy at times when renewable energy production is low. As noted above, the increasing amount of renewables on the grid means that soon electricity may produce less CO2 per unit than gas. It is important therefore that new development does not "lock in" the use of gas, which will need to be phased out as a heating fuel in order to meet local and national climate change targets. A heat hierarchy policy which expects proposals to use renewable heat will be considered to steer development towards renewable sources (e.g. ground and air sourced heat pumps, solar thermal panels and biomass) whilst referencing the opportunities for heat networks in the areas set out in Policy CP4.
3. **Offset what can't be mitigated on site: Up to net zero carbon.** Rationale: Remaining emissions up to 100% regulated and unregulated CO2 can be offset by payments into a local fund for off-site measures such as renewable energy or energy efficiency in existing buildings. This can include historic buildings (including Listed Buildings) in accordance with the Council's Energy Efficiency & Renewable Energy Guidance For Listed Buildings and Undesignated Historic Buildings (adopted September 2013). Offsetting would achieve the objective of draft JSP Policy 5, mitigating all emissions (regulated and unregulated) arising from heat and power use in the buildings. The Council is considering the option to include offsite renewables and power purchase agreements as mechanisms to offset emissions that cannot be mitigated onsite.

The **BREEAM Excellent** standard is also being considered for major non-domestic development. Exemptions to the policy approach above may be made for **Certified Passivhaus** buildings. Performance **monitoring** post-occupancy is also being considered.

the BREEAM Excellent Standard is being considered since it is a holistic standard that covers many aspects of sustainability that are otherwise not addressed through policy.

8.3.7 The policy will also seek to address the "performance gap", whereby monitoring has shown that new buildings have significantly higher carbon emissions than as expected in their design. Buildings that are certified to the Passivhaus standard could be exempted from some of the carbon reduction requirements above since the quality control required to become Passivhaus Certified has been shown to result in very low energy buildings that perform as predicted in the design. A requirement for the monitoring of energy performance is also being considered to highlight which buildings are achieving the standard following occupation.

Current policy approach

8.3.8 The current Placemaking Plan (PMP) Policy SCR1: Onsite Renewable Energy requires major development to achieve a 10% reduction in CO2 emissions from renewable energy sources. The Sustainable Construction Checklist Supplementary Planning Document (2018) embeds this 10% requirement into a broader benchmark for all scales of new build development to achieve a 19% CO2 reduction for compliance with PMP Policy CP2: Sustainable Construction. Medium scale development on existing buildings is expected to achieve a 10% reduction in CO2 emissions.

Emerging policy approach

8.3.9 The preferred option is to set a zero carbon policy with three elements reflecting the energy hierarchy as below. This is subject to the Council's viability testing showing that this approach is viable. Resultantly, there may be variations in the policy across development type, scale or location.

8.4 Harnessing wind energy

Setting the scene

8.4.1 In order for B&NES to meet its renewable energy targets, the Council will also need to harness energy from other renewable energy sources. Although there is insufficient wind resource for large wind farms, wind is still the largest renewable resource in B&NES.

8.4.2 For some time it has been Government policy for local planning authorities to have a positive strategy to promote energy from renewable and low carbon sources including the identification of suitable areas for renewable and low carbon energy sources.

8.4.3 For wind energy development Local Plans should identify areas suitable for renewable and low-carbon energy development and make clear what criteria have determined their selection, including what size of development is considered suitable in these areas. The revised NPPF (July

2018) states that:

'A proposed wind energy development involving one or more wind turbines should not be considered acceptable unless it is in an area identified as suitable for wind energy development in the development plan; and, following consultation, it can be demonstrated that the planning impacts identified by the affected local community have been fully addressed and the proposal has their backing.'

8.4.4 The preparation of the Local Plan presents an opportunity to reconsider the Council's approach to wind energy development in light of the NPPF.

8.4.5 A study has been undertaken to assess the landscape sensitivity to wind development for small, medium and large wind turbines. It also provides guidance on identifying suitable areas for the location of wind turbines in the formulation of criteria against which specific proposals may be assessed in relation to landscape impact. Further work was undertaken to identify Landscape and Visual Issues for Areas with Technical Potential for Wind Energy Development.

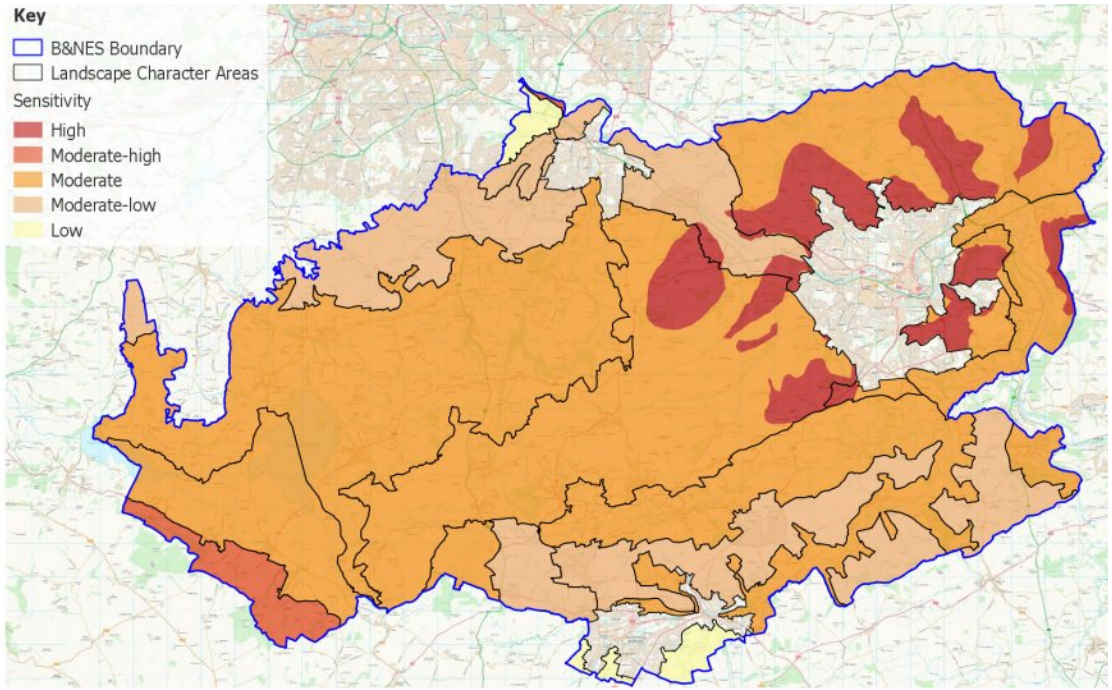


Diagram 46 - Landscape Sensitivity for Wind Energy Development

Emerging policy approach

8.4.6 Although B&NES may not have the resource for large wind farms there are more areas potentially suitable for medium or small turbines which could be better suited to community projects. The diagram above shows the landscape sensitivity analysis for small scale wind turbines.

8.4.7 The suggested approach is to identify areas suitable for wind energy development on the Local Plan Policies Map, based on the landscape sensitivity analysis study and other landscape character and ecological evidence and supported by a comprehensive criterion-based policy. This would give greater certainty as to where such development will be acceptable

provided the impacts identified in the policy can be successfully mitigated. This would also need to take in to account environmental sensitivity.

8.4.8 The findings of the study prepared support the Joint Spatial Plan suggest that offsite wind turbines may be one means of achieving the zero carbon standard on the Strategic Development Locations. This is technically possible given there is sufficient unconstrained wind resource within a 2km boundary of Keynsham and Whitchurch.

8.4.9 In identifying suitable areas for wind energy development the Council would be contributing positively towards increasing the supply of renewable and low carbon energy.

8.4.10 Renewable energy projects, including wind turbines, are not one of the excluded categories from Green Belt policy and therefore would by definition be inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects were to proceed on Green Belt

DM2 Emerging policy approach for harnessing wind energy

It is proposed that the policy framework for wind energy development should cover and address the following considerations:

- Proposals for wind energy development must lie within an area identified as being suitable for this type of development
- Community support for the scheme can be demonstrated and the material planning impacts identified by affected local communities can been adequately addressed
- Minimum separation distance between the proposal and all residential properties in the locality reflects industry best practice and case law
- Satisfactorily address impact on:
  - Residential amenity resulting from noise, vibrations, shadow flicker or visual dominance
  - Landscape character and visual impact including cumulative impacts
  - Landscape and scenic beauty of the Cotswolds and Mendip Hills AONBs
  - Historic environment including Bath World Heritage Site and its setting
  - Biodiversity and ecology
  - Highway safety and aviation
- Applications for the replacement and re-powering of existing wind turbines within the district will be considered, in line with the guidance in the NPPF 2018

locations. These could include the wider environmental benefits associated with increased production of energy from renewable sources. The Council has already published an Informal Guidance Note on renewable energy in the Green Belt to provide greater clarity on this issue.

8.5 Housing

Affordable Housing

8.5.1 The four West of England Unitary Authorities have established their commitment to maximise affordable housing delivery across the sub-region. Affordable housing is therefore given a significant priority in the Joint Spatial Plan (JSP) especially given the scale of the need and historic low delivery rates. Draft JSP Policy 3 provides the context for affordable housing policies in the Local Plans. It also stipulates that the delivery of affordable housing should be in a range of tenure and unit types.

8.5.2 The NPPF encourages local planning authorities to plan for and facilitate the delivery of housing to meet local needs in rural areas, particularly for affordable housing. The Local Plan will also need to address other affordable housing related issues arising from the revised NPPF (July 2018) including:

- Ensuring that 10% of all homes on major development are for affordable home ownership
- Identifying sites and supply of homes for essential local workers
- Specifying size, tenure and type of housing for different groups in the community that require affordable housing
- Ensuring there are sites solely for build for rent (the above 10% requirement does not apply)

8.5.3 How these elements of affordable housing will be addressed through the Local Plan will depend on the level of identified need and the level of flexibility the Council would wish to introduce a policy framework. Further work will be needed to inform the policy approach in respect of these areas.

8.5.4 The following section discusses areas of affordable housing provision where a change in approach is suggested.

Rural Exceptions Sites

8.5.5 One element of affordable housing provision is through 'rural exceptions' sites i.e. affordable housing on those sites which would not normally be used for housing. The revised NPPF also makes it clear that:

Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this.

8.5.6 Preparation of the Local Plan presents the opportunity to consult stakeholders on the appropriateness and scale of affordable housing on sites that would not normally be used for housing development i.e. as an 'exception' to restraint policies that would normally apply both outside and within the Green Belt. This

means on sites outside the Housing Development Boundary (HDB) for settlements.

Issues with the current policy approach

8.5.7 Core Strategy Policy RA4 sets out the current policy in respect of rural exceptions sites that broadly reflects the NPPF policy. The supporting text to the policy currently emphasises that it is imperative that the majority of the scheme must be affordable and that market housing will only be permitted where it is robustly demonstrated it is needed to subsidise the provision of affordable housing.

8.5.8 However, the rural exceptions policy has not delivered any affordable housing so far during the Core Strategy period (2011 - 2029). This is largely due to changes in the affordable housing sector funding and delivery models, but also to the restrictive and overly complex nature of exception site delivery, as well as a relatively imprecise planning policy.

8.5.9 The current policy does not provide any guidance on the scale or size of exceptions site that will be permitted and provides limited clarity on the level of market housing appropriate in cross-subsidising delivery of affordable housing. This lack of clarity is acting as an obstacle to the delivery of affordable housing on exceptions sites.

Site size

8.5.10 The references to 'small sites' in the supporting text to Policy RA4 and 'limited affordable housing' in the NPPF has been interpreted by the local planning authority to mean sites of 10 dwellings or fewer as this is the threshold generally used to differentiate between small sites and large sites.

8.5.11 This scale of development is not generally attractive or financially viable to Registered Providers (RPs). In larger villages, need can significantly exceed 10 units and where open market homes are required to cross-subsidise affordable housing provision, this further reduces the delivery of affordable homes to meet local need. The size and nature of development needs to be appropriate to the settlement, but recognition should be given in the policy that developments larger than 10 units can be appropriate in the case of rural exception sites.

Market housing

8.5.12 Policy RA4 indicates that a small proportion of market housing may be appropriate where it is required to help ensure viability of affordable housing. The supporting text states that the 'majority' of the scheme should be affordable. This is subject to wide interpretation as the level of market housing will vary dependent on the specifics of the site/scheme and the amount of public subsidy that is available. Further clarity on this within the policy would therefore help to facilitate delivery.

Emerging policy approach

8.5.13 It is proposed that many key elements of the existing policy should be retained, including ensuring provision meets a demonstrable need for affordable housing, that homes remain as affordable housing

in perpetuity and local connections test are met. Given that 'exceptions site' developments would be outside controlled/defined areas (i.e. the HDBs), it is considered necessary to emphasise the importance of developments being on sites well related to settlements and appropriate to their context in terms of character, scale and form. In relation to the Green Belt locations the policy should also seek to ensure that 'exceptions sites' are selected in order to minimise harm to the Green Belt.

8.5.14 Reference to the scale of development (size or capacity of site) should also be made in the policy to enable viable delivery and attractiveness for RPs. Discussions with RPs suggest that this would be around 15 – 20 dwellings.

8.5.15 Finally greater clarity on the market housing element/proportion should be provided in the policy. Whilst the element of market housing will be subject to robust viability testing taking account of the level of public subsidy available, evidence suggests that it may be necessary for

DM3 Emerging policy approach for rural exceptions sites:

- As an exception to local policies that restrain housing development including directing development to within HDBs, development of affordable housing (as defined by the NPPF) will be permitted provided that it is well related to a settlement and its scale, character and form is appropriate to its context, and has no adverse impact on internationally or nationally protected species and/or their habitats.
- Exceptions sites within the Green Belt (either limited infill within the HDB or sites adjoining the HDB) must also be selected in order to minimise harm to the openness and purposes of the Green Belt.
- Sites could have a capacity of up to 20 dwellings in total subject to levels of housing need, cross-subsidy requirements and the size of settlement. The affordable housing must meet a demonstrable local need for affordable housing.
- The affordable housing must remain affordable in perpetuity.
- Occupancy of the affordable housing should remain, as a first priority, for those with demonstrable local connections, as assessed by the Council (using Homesearch policy criteria).
- Up to 40% market housing will be appropriate where it can be demonstrated that the market housing is essential to cross-subsidise the affordable housing and that the site would be unviable or undeliverable without this cross-subsidy, taking into account the availability of public subsidy.
- Cross-subsidy market housing could be secured by means of built units or self-build opportunities.

8.6 Regeneration of Social Housing

8.6.1 The case for regeneration of areas of social housing is often based on a concentration of poor quality housing stock, in both larger estates and smaller developments, where a comprehensive programme of repair or refurbishment is not a cost effective or deliverable solution. The other significant driver for regeneration of social housing estates is the correlation between the large concentrations of social housing stock and socio-economic deprivation. In these cases, even large scale investment in existing housing stock may not address the socio-economic challenges or lessen the strain on wider support services across the area.

8.6.2 In some instances redevelopment-led regeneration of social housing may be the most effective means of delivering improvement. Policy H8 in the Placemaking Plan sought to facilitate such redevelopment in order to deliver enhancement to the social housing stock.

Issues with the current policy approach

8.6.3 In seeking to facilitate redevelopment or regeneration of social housing the current policy seeks, as the starting point, to ensure that there is no net loss in affordable housing. However, the current policy caveats this position by stating that it is subject to viability considerations and other social balance considerations. Therefore, it allows the applicant to demonstrate viability or social balance/community mix reasons as to why retaining the existing number of affordable units cannot or should not be delivered.

8.6.4 The need for affordable housing within B&NES and particularly in Bath is significant and therefore, any potential loss of affordable housing through operation of the current policy is of concern.

8.6.5 It is proposed that options relating to the explicit inclusion of viability considerations within the policy should be considered. The alternative means of improving social housing stock through refurbishing

DM4 Proposed policy approach options for the regeneration of Social Housing

1. Where the redevelopment/regeneration of areas of social housing is supported it is required that there will be no net loss of affordable housing subject to social balance considerations
2. Where the redevelopment/regeneration of areas of social housing is supported it is required that there is no net loss of affordable housing subject to social balance and viability considerations. The consideration of viability must take into account the cost of repairing or refurbishing the existing properties

or repairing individual properties also has a financial cost. In operating the policy and considering viability the cost of property repair/ refurbishment should be taken into account. This represents one policy approach option. In addition the 2018 NPPF promotes an approach of viability being tested at the plan-making stage in order to ensure that Local Plan policies are deliverable. Viability should not need to be considered in the course of determining individual planning applications and should only be necessary where the applicant can demonstrate it is necessary due to changed circumstances. This would suggest that the Local Plan policy itself should not explicitly reference viability testing.

8.6.6 In accordance with the factors outlined above it is proposed that the policy should be tightened in respect of achieving no net loss of affordable housing units. There are two options in respect of viability considerations and these are outlined above.

8.7 Self-build (including custom house-building)

8.7.1 The NPPF states that Councils should plan for a mix of housing including for people wishing to build their own homes. The Self-build and Custom Housebuilding Act 2015 introduced a duty on local authorities to keep a register of people who want to build their own homes and to grant permissions for enough serviced plots of land to meet the demand on the register. Self-build permissions are identified using claims for exemption from Community Infrastructure Levy (CIL) payments (self-build dwellings are exempt from CIL).

Issues with the current policy approach

8.7.2 Policy H4 in the Placemaking Plan encourages self-build, but it does not create a policy environment that directly facilitates the delivery of self and custom build housing. Therefore, in order to facilitate the approval of the number of plots required to meet demand, it is considered that further policy intervention is necessary, as sufficient plots are unlikely to come forward without it. Promotion of self-build is also in accordance with the Government's stated ambition of diversifying the housing market (i.e. moving away from a market dominated by large-volume house-builders).

Options for facilitating the delivery of self-build plots

8.7.3 The existing policy framework already allows for single plot self-build schemes to come forward within urban areas and villages (within Housing Development Boundaries), and small numbers are currently being delivered. However, this is unlikely to provide enough serviced plots to meet the duty under the Act.

8.7.4 Other Councils have also introduced requirements for a minimum proportion of large sites to be self-build – for example, Teignbridge and South Gloucestershire have policies requiring a 10% self-build plots on sites over 20 and 100 respectively. Others have gone further still, for example, Cherwell District Council

DM5 Approaches for facilitating the delivery of self-build plots

- include self-build plots as part of the two Strategic Development Locations at North Keynsham and Whitchurch
- include self-build plots as part of larger 'standard' housing schemes
- allow self-build-only schemes (large or small)

has purchased and allocated land for around 2,000 self-build dwellings and expects to make a financial return.

8.7.5 Therefore it is clear there are a number of different policy approaches that could be explored which might help boost the delivery of self-build plots in Bath & North East Somerset. The policy approaches above are presented for purposes stimulating discussion to address facilitating the delivery of self-build plots:

8.8 Extra care housing

8.8.1 The Placemaking Plan currently seeks to enable delivery of housing and facilities provision for the elderly and those with other supported housing or care needs through Policy H1. 'Extra care housing' is recognised as making an important contribution to the District's affordable housing provision and helps increase the choice of housing options.

The issue

8.8.2 The Use Classes Order sets out different categories of residential use and makes a distinction between residential institutions (Class C2) and dwelling houses (Class C3). As a rule of thumb, a residential care home consisting usually of just a bedroom (and possibly a bathroom) but with everything else communal, including meals is Class C2 whereas sheltered housing based on self-contained accommodation with a warden or manager and no direct provision of care is classified as housing, therefore Class C3 .

8.8.3 However it is often unclear how 'extra care housing' should be categorised which has led to uncertainty and contention. Debates hinge on whether a development for older people should be Class C3 and therefore liable to CIL requirements and may be required to include an element of affordable housing within a scheme. This is not the case if the scheme falls within Class C2 and is nil rated in respect of CIL and not currently subject to an affordable housing requirement. The issue arises when a scheme involving self-contained accommodation has been combined with extensive communal facilities and the provision (or availability) of personal care, and often some meals, within the same overall scheme.

8.8.4 It is clear that extra care housing can take a variety of forms which influence whether it is classified as a C2 or C3 use. The Housing Learning and Improvement Network (LIN) explains that 'the term 'extra care' housing is used to describe developments that comprise self-contained homes with design features and support services available to enable self- care and

DM6 Proposed policy approach for extra care housing

Redraft Policy H1 to address the Class C2/C3 issue in respect of 'extra care housing' making it clear that the nature of a scheme will determine whether it comes within category C2 (dwellings houses) or C3 (residential institutions) of the Use Classes Order. The policy should make it clear that schemes will fall within Class C2 and/or Class C3 and that each Use Class will be subject to different requirements as regards financial contributions, location (in the case of Class C3 which will be considered in the same way as other C3 residential uses) and affordable housing. The requirements under each Use Class will then be stipulated.

independent living.' The Council will need to consider the nature and type of accommodation to be provided in each scheme in order to determine this and whether the proposal is either C2 or C3 Use Class or separate elements of the scheme fall under one or other of the these Uses Classes.

8.8.5 Given that Policy H1 as currently written does not provide sufficient clarity for considering applications for 'extra care housing' the approach above is proposed to address this.

8.8.6 It is also recommended that reference to the Department of Health's Extra Care Housing Toolkit (or successor document) is included in the Local Plan which will assist both developer and decision maker.

8.9 Housing standards

8.9.1 Local planning authorities can set standards exceeding the compulsory minimum required by Building Regulations for access and water efficiency. Currently there is no compulsory minimum standard for internal space, but this can be introduced through the Local Plan, known as the nationally described space standard. This approach is supported by the NPPF which states that 'Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified.'

Water efficiency

8.9.2 The Council has already adopted the higher standards relating to water efficiency via PMP Policy SCR5, through which all dwellings will be expected to meet the national optional Building Regulations requirement for water efficiency of 110 litres per person per day. No changes to this policy approach are proposed other than to confirm that all new dwellings will be required to meet the optional standard of 110 litres (see DM17).

Accessibility

8.9.3 The Council has also adopted enhanced accessibility standards. However, this is implemented differently for affordable and market housing. For market housing, this is

DM7 Proposed policy approach for housing accessibility policies

It is recommended that the housing accessibility policies are consolidated within the Local Plan, informed by appropriate supporting evidence.

through Placemaking Plan Policy H7, whereas for affordable housing, it is through the Planning Obligations Supplementary Planning Document (SPD).

8.9.4 This creates an issue principally in terms of the discrepancy in status – a SPD carries less weight than a Development Plan policy. It requires the use of two documents, which reduces the accessibility of the plan to the user. Most importantly, the standards in the SPD were merely rolled forward and are not supported by the required evidence.

8.10 Internal Space

8.10.1 Internal space standards are currently only applied to affordable housing. For market housing, the standard is usually exceeded, but occasionally it is not. There is a significant body of research on the health benefits of adequately sized housing and that housing in the UK is, on average, significantly smaller than housing in Ireland, Denmark or the Netherlands. As with the accessibility standards, the discrepancy between

DM8 Proposed policy approach for space standards

It is recommended that the nationally described space standard be introduced for all housing in B&NES, both affordable and market housing, with the exception of 'micro housing' providing a high quality living environment.

Diagram 47 - Approved Micro Housing at 'Banglo'

affordable and market housing is also considered sub-optimal.

8.10.2 However, 'micro housing' is also emerging as a niche market, which could meet housing needs to an acceptable, albeit smaller, standard, at a lower cost to occupiers. An example of this is the recent permission at 44 Lower Bristol Road, Bath ('Banglo'), which included units that are smaller than the national standard, but are designed in such a way that they provide a good living environment. The possibility of this type of housing should remain open, so if the nationally described space standard is introduced, a suitable exception for appropriately designed 'micro housing' should be included.

8.11 Replacement dwellings outside the Green Belt

The Issue

8.11.1 In order to provide more appropriate residential accommodation to suit household needs or better quality housing it can be necessary or beneficial to provide a replacement dwelling. National policy regards construction of a replacement building (including a dwelling) as appropriate development within the Green Belt as long as it is in the same use as the existing building and is not materially larger than the one it replaces. In areas of open countryside (i.e. outside housing development boundaries (HDBs) defined for settlements) the local policy framework set by the PMP is more restrictive. This is because no policy is included in the PMP relating specifically to replacement dwellings and the principle of residential development is unacceptable outside HDBs. Therefore, in order to facilitate the provision of replacement dwellings (i.e. one new dwelling replacing one existing dwelling) in areas outside the Green Belt and settlement HDBs it is proposed that a policy could be introduced in the Local Plan setting out the criteria against which applications would be determined.

DM9 Replacement dwellings outside the Green Belt

Outside the Green Belt and defined housing development boundaries the provision of a replacement dwelling should be permitted where it is not materially larger than the dwelling it replaces and the creation or extension of a residential curtilage does not harm rural character.

8.12 Housing in Green Belt Villages

8.12.1 The NPPF makes it clear that the construction of new building in the Green Belt is inappropriate development and should not be permitted other than in very special circumstances. It goes on state that exceptions to this (and therefore, not inappropriate development) include limited infill development within villages that are within and 'washed over' by the Green Belt; and limited affordable housing to meet local need

under policies in the Local Plan.

8.12.2 PMP Policy GB2 states that in villages washed over by the Green Belt limited infill housing development is acceptable where it lies within the Housing Development Boundary (HDB). The HDBs are shown on the Policies Map. As such the purpose of Policy GB2 is to provide certainty as to where residential development would be acceptable within such villages. Additionally the supporting text of the Placemaking Plan defines what is meant by the term infill.

Issues with the current policy approach

8.12.3 As set out above the NPPF makes it clear that limited infilling in villages is not inappropriate development. The HDBs defined in the PMP identify those areas in villages where proposals for residential development as limited infilling would be acceptable. However, there are other settlements within the Green Belt where HDBs are not defined e.g. Dunkerton or North Stoke. Therefore, in order to ensure that the extent of areas where infill opportunities exist is fully identified the HDBs require review, to ascertain whether they should be defined for settlements currently without one. In order to be clear about their purposes HDBs within Green Belt villages could also be renamed as 'infill boundaries'. By identifying 'infill boundaries' greater certainty is provided for the applicant and decision maker, not only for infill proposals, but also in respect of opportunities to provide 'limited affordable housing to meet local community needs' as set out in the NPPF which may be appropriate outside infill boundaries.

8.12.4 The alternative approach would be for the Local Plan to no longer define HDBs or infill boundaries for villages within the Green Belt and for it to be

DM10 Proposed policy approach options for housing in Green Belt villages

Options:

1. Limited infilling in villages to be appropriate within defined 'infill boundaries'. The current HDBs would be reviewed in order to ensure they have been defined so as to identify the extent of limited infill opportunities in all villages washed over by the Green Belt where such opportunities exist.
2. Limited infilling in villages to be allowed and for this to be determined at the time of considering a planning application. HDBs or infill boundaries would not be defined for Green Belt villages.

Proposed Approach:
Simplify the definition of limited infill to state 'The filling of small gaps within existing development in an otherwise extensively built up frontage.'

determined whether a proposal represented 'limited infilling' on a case by case basis at the time of considering an application.

8.12.5 The Core Strategy currently defines infilling in relation to housing as 'the filling of small gaps within existing development e.g. the building of one or two houses on a small vacant plot in an otherwise extensively built up frontage, the plot generally being surrounded on at least three sides by developed sites or roads.' For clarification it is proposed that this definition should be simplified as set out above.

8.13 Employment uses

8.13.1 The NPPF requires that Local Plans should give significant weight to supporting economic growth and productivity. The emerging Joint Spatial Plan sets out the overall level of job growth to be planned for across the West of England and identifies key locations for economic investment and development. This Council's Economic Strategy seeks to ensure a sustainable economic future for B&NES residents by focusing on and developing key high value, high growth business sectors and their associated products, services and employment requirements. Alongside preparation of the Draft Local Plan the Economic Strategy will be reviewed in order to ensure it remains fit for purpose. In order to inform this process initial work has been undertaken looking at the key sectors of the B&NES economy within the context of the JSP and economic projections that underpin it.

8.13.2 In planning for economic growth and supporting the needs of businesses and resident workers protecting existing employment land, as well as planning for the delivery of new employment space (see place based chapters), is essential.

Key Issues

8.13.3 The previous NPPF set out a presumption that employment land and premises should be redeveloped for housing, unless there are 'strong economic reasons' as to why this would be inappropriate. The revised NPPF published in 2018 continues to encourage the use of previously developed land for housing, and that using currently unallocated retail and employment land for homes should be supported but only where it does not undermine key economic sectors and would be compatible with other policies in the Framework (including those relating to supporting economic growth and productivity).

8.13.4 Within the context of the previous NPPF and permitted development rights the Adopted Core Strategy and Placemaking Plan set out a policy framework that sought to manage the loss of industrial floorspace, and planned for the delivery of new grade 'A' office accommodation to replace the outdated stock across the area, that is no longer fit for purpose. Evidence shows that since the start of the Core Strategy period in 2011 losses across the District have exceeded the levels set out in the Plan, and the necessary new employment development has not been realised.

8.13.5 Additionally evidence shows

DM11 Proposed policy approach for industrial land

At identified strategic industrial sites allow the appropriate provision of additional industrial space and a strong presumption in favour of retaining existing industrial space.
Other (non-identified) industrial sites across B&NES should be retained in industrial/business use unless the applicant can demonstrate the site is not needed for such purposes.
In applying such a policy approach the Local Plan would need to set out the factors or criteria against which the applicant would need to justify the proposed loss of industrial space. These factors could include:

- quality of the industrial premises and suitability of the site to provide continued industrial or alternative B1a or B1b use;
- the quality and availability of alternative sites or industrial premises to meet demand;
- position against strategic employment land/floorspace targets;
- economic market signals; and
- extent of marketing for industrial use undertaken and associated interest.

Alternative approach
Retain existing policy approach of more strongly protecting identified strategic sites, but reviewing the identified sites to ensure all sites in key locations such as Bath and Somer Valley Enterprise Zones are included.

that demand for industrial space has increased and is greater than was envisaged at the time of preparing the Core Strategy and Placemaking Plan. There are also limited opportunities to provide new industrial land, especially in Bath.

Emerging Policy Approach: Industrial Land

8.13.6 In relation to industrial land the Placemaking Plan identifies strategic sites and includes a policy that facilitates the provision of new industrial space within them and a strong presumption in favour of retaining existing B1/B2/B8 floorspace (Policy ED2A). This policy is considered still to be appropriate and is not proposed to be changed other than ensuring the wording reflects the 2018 NPPF. However, in order to support the Draft Local Plan a further employment land review will be undertaken to confirm whether the strategic industrial sites listed in Policy ED2A also remain appropriate and whether any further sites should now be considered to be strategic and warrant the protection of ED2A. For the non-strategic industrial sites across B&NES Placemaking Plan Policy ED2B reflected the 2012 NPPF presumption in favour of re-using employment land for housing.

8.13.7 Given changes to national policy identified above; the significant losses of industrial land that have occurred since 2011; and the increased demand for industrial accommodation it is proposed that stronger policy protection of non-strategic or other industrial sites should be introduced. The proposed policy approach would seek retention

of non-strategic industrial land for industrial uses, unless it can be demonstrated by the applicant that it is not needed for such uses. This approach would apply to non-strategic industrial sites across the whole District, in order to protect space and jobs across all communities helping to provide local employment opportunities. The alternative option would be to retain the existing approach of most strongly protecting industrial space only in identified key or strategic sites, but reviewing these sites to ensure all relevant sites are included within key locations identified such as the Bath & Somer Valley Enterprise Zones. This approach would maintain and retain key employment areas, but provide some flexibility for other uses, including housing, elsewhere.

Emerging Policy Approach: Office floorspace

8.13.8 Monitoring information shows that there have been significant losses of office floorspace since 2011. In comparison to industrial uses there are greater opportunities to provide new floorspace, including within Bath Enterprise Zone and the Strategic Development Locations at North Keynsham and Whitchurch. Office floorspace losses have increased partly because of the introduction by the government of permitted development rights for a change of use from offices to residential.

8.13.9 Evidence suggests that, as long as key development sites such as Bath Quays North are delivered and losses within the city slow, meeting the Core Strategy target for office floorspace net gains within the city remains on track. In order to help stem office floorspace losses the Council is currently consulting on the introduction of an Article 4 Direction

DM12 Proposed policy approach for office floorspace

Office to residential (C3):
Office space within Bath city centre (as defined in the Article 4 Direction) should be retained in office use unless the applicant proposing residential development (C3 uses) can justify its loss, with reference to the following factors:

- suitability of the accommodation for office use
- how long it has been vacant and the extent of marketing undertaken
- the position in respect of housing, office and other business floorspace against Local Plan requirements
- whether the offices are within a strategic location

Office to C2 & 4 residential/Purpose Built Student Accommodation/mixed-use:
For applications seeking to convert/redevelop office space across B&NES for PBSA; mixed uses; or C2 & C4 residential uses there is a presumption that the office floorspace should be retained, unless the loss can be justified by the applicant with reference to the factors above.

removing office to residential change of use permitted development rights in Bath city centre.

8.13.10 Placemaking Plan Policy ED1B sets out the current policy relating to the change of use or redevelopment of offices to non-student residential (C2, C3 or C4) uses. It is a complex policy that needs simplifying and clarifying. It needs to be amended to reflect current permitted development rights plus the introduction of the Article 4 Direction in Bath city centre and to more closely accord with the 2018 NPPF.

8.13.11 Office floorspace also comes under pressure for redevelopment or conversion for purpose built student accommodation (especially in Bath) and mixed use schemes, which may include a residential element. Given the importance of retaining an adequate supply of office floorspace to meet the needs of the B&NES economy it is proposed to extend the policy approach to these other uses.

8.14 Fast food takeaways

The issue

8.14.1 One of the roles of the planning system is to support 'strong, vibrant and healthy communities' and to 'take account of and support local strategies to improve health, social and cultural wellbeing for all and deliver sufficient community and cultural facilities and services to meet local needs.'

8.14.2 The local planning authority is working with the public health authority to understand and take account of the health status and needs of the local population and information about relevant barriers to improving health and wellbeing in formulating planning policies.

8.14.3 Unhealthy weight, obesity and diet-related disease are key health priorities highlighted in the Joint Health and Wellbeing Strategy, Healthy Weight Strategy and Local Food Strategy for B&NES. The Joint Health and Wellbeing Strategy identifies B&NES' key health and wellbeing priorities as including helping children to be a healthy weight and creating healthy and sustainable places.

8.14.4 The Healthy Weight Strategy provides a framework for action to address unprecedented levels of obesity in Bath and North East Somerset. The strategy recommends action to control exposure to calorific food and drink, including reducing the number of new fast food outlets near educational settings.

Studies

- Evidence indicates that exposure to fast food outlets in home, work and commuting environments is associated with higher consumption of takeaway food, which is generally higher in salt, sugar and saturated fat, and an increased likelihood of being overweight.
- B&NES had 146 fast food takeaways with an average of 70

outlets per 100,000 population as at December 2017 (Public Health England, 2018). A number of wards in B&NES (namely Abbey, Keynsham North, Kingsmead, Midsomer Norton North, Radstock and Walcot) have a higher than national average density of fast food outlets per 100,000 population (greater than the comparable national rate of 88 per 100,000 population).

- Based on information from Public Health England the density of fast food outlets has increased in B&NES from 52 - 63 outlets per 100,000 population in 2010 to 70.3 outlets per 100,000 population in 2015 (to be replaced by 2017 stats).

DM13 Proposed policy approach options for fast food outlets

Option 1: Fast food takeaways and schools
Policy aim: Prevent fast food takeaways from opening near schools and youth facilities
Not permitting A5 uses within a given distance of an existing (or proposed) school, youth club and/or leisure centres but allow A5 uses beyond the given distance threshold with conditions restricting opening during school hours. The only exception to this approach could be where the proposal is within a designated centre and it can be demonstrated that the introduction of such a use will significantly contribute to the vitality and viability of that centre.

Option 2: Overconcentration and clustering
Policy aim: Prevent the overconcentration and clustering of fast food outlets
Proposals resulting in a harmful concentration of A5 uses will not be permitted. When considering whether a proposed fast food takeaway would result in an over-concentration of such uses to the detriment of the vitality and viability of a town or local centre, regard will be had to a number of criteria including the number of existing fast food takeaway units in the immediate area and their proximity to one another and other uses in the area. What would constitute an appropriate concentration of A5 uses would need to be determined.

8.14.5 The key messages from Public Health England's research include:

- There is a clear relationship between the density of fast food and levels of deprivation
- The local environment has a major influence on our behaviours and streets crowded with fast food outlets can influence our food choices
- Local authorities can help to make our local environment more supportive of healthier choices, whether by creating 'healthier zones' (limiting the number of fast food outlets in certain areas) or working with local businesses to help them provide healthier options

Potential policy approach options for Bath and North East Somerset

8.14.6 It is clear from the evidence

summarised above that this is an issue that could be addressed through the new the Local Plan. In recent years over 21 local authorities have successfully developed planning guidance/ policies to prevent the proliferation of hot food takeaways and a range of policies or criteria have been used to control and manage the impact of new hot food takeaways, addressing:

- concentration and clustering of hot food takeaways in town or local centres
- hot food takeaways in close proximity to schools
- restaurants providing a takeaway service
- hot food takeaways in new developments
- residential amenity, such as noise and odour

8.14.7 Based on approaches taken by other local authorities, a policy approach for B&NES Local Plan could be developed around the following two options:

8.15 Parking Standards

8.15.1 Placemaking Plan (PMP) Policy ST7 requires that development proposals provide an appropriate level of car parking in accordance with the standards defined in the schedule accompanying the policy. There is some flexibility for applicants to demonstrate they should provide less parking than the minimum standard where supported by an accessibility assessment or a greater level of parking dependent on the circumstances of the individual proposal. The PMP was adopted in summer 2017 and whilst these parking standards have been implemented for less than a year, circumstances have already changed and issues have arisen warranting the need for an early review of these parking standards. The immediacy of the changed circumstances and information since adoption of the Placemaking Plan may also suggest that the process by which the parking standards are defined should be re-considered.

8.15.2 Three key issues have been identified where parking standards may need to be reviewed:

- Residential Parking Standards
- Purpose Built Student Accommodation
- HMOs

8.15.3 Further assessment work is needed (including surveys of on-street parking) to help inform the review of parking standards in these three areas. This work has not been completed to inform the Local Plan Options document and the approach options presented below should be viewed in this context. The policy and standards defined through the Draft Local Plan will reflect evidence from the assessment work.

Residential Parking Standards

8.15.4 The PMP defines two sets of parking standards for residential development (related to dwelling size) - maximum residential parking standards for central Bath, that take account of the accessibility of this area by sustainable means of transport, and minimum parking standards for the rest of the District.

8.15.5 The minimum standards include a garage and the PMP also defines the minimum dimensions for a garage to ensure it can be used for a car.

8.15.6 The setting of minimum parking standards for residential development outside central Bath is part of the strategy of seeking to manage carefully the use of cars by restricting destination parking as opposed to point of origin parking (i.e. the home). Additionally the parking standards defined were intended to help manage and avoid potential problems of congested on-street parking in new development.

8.15.7 There is evidence that in some new development inappropriate on-street parking is causing problems e.g. impeding access by emergency or delivery vehicles and obstructing footways for pedestrians especially those with limited mobility, wheel chair users or those with pushchairs. This is often due to poor design and may, in part, be caused by households not using garages for car parking allied to high levels of car ownership.

DM14 Policy Options for Residential Parking Standards:

District-wide differentiation

1. Develop and define parking standards differentiated spatially in broad areas or zones across the District reflecting key accessibility characteristics
2. Continue with the current standard minimum parking standards in Bath city centre and uniform maximum parking standards elsewhere in B&NES

Garages

1. Continue to include garages in the residential parking standard
2. Exclude garages from the residential parking standard and review the number of spaces required for different size dwellings

On-street Parking & Highway Design

Proposed to include in the Local Plan policy or a SPD guidance on highway design and on street parking provision.

Car Club Spaces

Proposed to introduce a requirement to provide car club spaces and electric bike hire points in new development, within appropriate parts of the District.

It might also be related to a locality's accessibility by non-car travel modes i.e. in some parts of the District residents are more reliant upon a car to access employment opportunities or services and facilities. A number of parish councils, through work on their Neighbourhood Plans, have and are seeking to provide a greater number of spaces than established through the PMP standards.

8.15.8 The implications for development form of different parking standard options and increasing parking provision will also

need to be considered. For example an increased parking requirement may have implications for the amount of land available for other uses such as Green Infrastructure or for development density and site capacity in the context of making efficient use of land. There are a number of different ways in which parking spaces can be provided, and the requirement for all parking to be provided on-plot can be an impediment to good urban design. In many successful new housing developments car parking is provided in a combination of ways, including on-plot, as well as parking courtyards, car barns and on-street lay-bys. Good urban design is critical to ensure that a high quality residential environment is achieved whilst accommodating car parking requirements. In this way it is possible to mitigate the problems caused by inappropriate and poorly designed on-street parking and consideration will be given as to whether the Local Plan should include policy relating to highway and parking design, including considering impacts on the character of Conservation Areas.

8.15.9 The different accessibility characteristics of different parts of the District may need to be better reflected in residential parking standards as there are instances that, even where accessibility assessments are undertaken, the level of parking still required through the existing standards is making development undeliverable. Additionally, comments are invited on whether residential parking standards should continue to include, or exclude, garages. This needs to be considered within the context of the spatial priority of encouraging sustainable means of travel and the potential role of other initiatives aimed at reducing the need for cars and the space required for parking. A requirement could be introduced to provide car club spaces as a proportion of overall parking spaces and electric bike hire points in new development. This would relate to development schemes in parts of the District with sufficient catchment area population to be served by car club vehicles, currently the urban areas.

Parking Standards for HMOs and Purpose Built Student Accommodation

8.15.10 In the Placemaking Plan no specific parking standard is set for HMOs (Use Class C4) and for Purpose Built Student Accommodation (PBSA) zero parking spaces are required. Anecdotal evidence suggests that typically the conversion of a dwelling into a HMO results in an increased

DM15 Options for defining Parking Standards:

Continue to define parking standards in a schedule within the Local Plan or to define them in a separate SPD.

Local Plan policy to refer to parking being provided in accordance with the standard defined in a SPD or a standard defined in a made Neighbourhood Plan based on robust evidence and it is consistent with the overall parking strategy.

demand for parking spaces which is causing on-street parking problems. The use of some properties as short term holiday lets; although not a different use class and outside the control of the planning system; may also exacerbate on-street parking problems. In addition some students that live in PSBA own and use cars which also appears to be causing on-street parking problems during term time (e.g. streets close to Riverside Court and Twerton Mill PBSA developments on Lower Bristol Road) and therefore, some parking for PBSA provision appears to be required.

8.15.11 It is proposed that surveys of student car ownership and on-street parking will be undertaken to better understand the extent of the problems relating to both HMOs and PBSA. Following this work, options as to how this can be best managed will be assessed and the associated parking standards that should be defined will be set out in the Draft Local Plan. It may be that other, non-planning measures will also need to be considered, especially in relation to HMOs and short-term holiday lets e.g. resident parking controls via permits.

Process for defining Parking Standards

8.15.12 Currently the parking standards for different forms of development are defined in a schedule set out in the Placemaking Plan. This is helpful in ensuring the standards are set out in one document alongside the associated policy. However, as Local Plans are reviewed every five years this is relatively inflexible if they require amendment to reflect changed circumstances. Defining them in an associated Supplementary Planning Document (SPD) would enable greater responsiveness and flexibility in amending the standards as necessary. It may also be possible to prepare parking standards for a greater range of land uses in more detail in a SPD.

8.15.13 In addition and in order to reflect locally specific circumstances Neighbourhood Plans may also seek to define parking standards. If parking standards are defined outside the Local Plan it would also be an option for the Local Plan policy to refer to parking being provided in accordance with standards defined in a Neighbourhood Plan, but only where these standards are supported by clear and robust evidence consistent with the overall parking strategy.

8.16 Electric vehicles infrastructure

National policy context

8.16.1 The Government has pledged to be the first generation to leave the environment in a better state than it inherited. The Road to Zero Strategy (2018) sets out the Government's ambition for at least half of new cars to be ultra-low emission by 2030. As well as significantly reducing greenhouse gas emissions, it is anticipated that the wide-scale adoption of ultra-low emission vehicles (ULEVs) will improve health and quality of life by making the air cleaner in towns and cities (The Clean Growth Strategy Leading the way to a low carbon future (October 2017).

DM16 Emerging policy approach for electric vehicles infrastructure

Overarching principle
Require all development proposals to integrate the provision of infrastructure into the design and layout of the development to enable the charging of electric or other Ultra-Low Emission vehicles

Residential Development:
- All individual dwellings with one or more dedicated parking spaces or garage to include infrastructure for charging electric vehicles.
- Where off street parking is not provided within a development proposal, the design and layout of the development should incorporate infrastructure to enable the on street charging of electric or other vehicles.
- For residential development with communal off street parking provision, at least 20 % of spaces to have active charging facilities, and passive provision for all remaining parking spaces with the layout of the car park ensuring that all spaces can be easily activated with minimal disruption as demand increases.

Active/passive charging
Preferred approach: Require 100% active charging facilities for all residential development (subject to further work).
Alternative approach: At least 20 % of dwellings to have active charging facilities, and the remaining 80% of dwellings to have passive provision.

Rapid/fast charging points
High density and/or large scale residential/mixed use developments to provide at least one rapid charging point clustered with a fast charging point (number per car to be determined) and the provision of an electric vehicle car club, and provide dedicated spaces for the car club with active charging facilities.

Non-residential development:
- In all non-residential developments providing 1 or more car parking bays, ducting to be installed to enable provision of charging facilities for electric vehicles.
- Where 10 or more car parking bays are provided, at least 20% of those bays to provide active charging facilities for electric vehicles, and passive provision for all remaining bays.
- In non-residential development where provision is made for taxis stopping, the taxi spaces are required to include active charging facilities.

Parking Strategy for B&NES:

Developments within Bath and North East Somerset Council should provide electric vehicle charging points in accordance with the following standards:

- Residential developments with shared car parks – active provision for 20% spaces and passive provision for 20% spaces
- Residential developments with individual parking – passive provision within each property
- Commercial developments – active provision in 5% car parking spaces

8.16.2 Planning policy and development management provide important delivery mechanisms to support the increased demand for electric vehicle recharging infrastructure. The revised NPPF (July 2018) states:

"If setting local parking standards for residential and non-residential development, policies should take into account … the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles." (para 105) and that "…..applications for development should … be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations." (para 110)

Local policy context

8.16.3 Placemaking Plan Policy ST7 - which sets out the policy framework for considering the requirements and implications of development for the highway, transport systems and their users - already states that for new development proposals, facilities for charging plug-in and other ultra-low emission vehicles will be sought where practicable. However, the policy does not currently include standards for the provision of electric charging infrastructure.

8.16.4 The recently adopted Parking Strategy for B&NES (February 2018) seeks to address concerns raised in the Bath Air Quality Action Plan (2016) and the Keynsham and Saltford Air Quality Action Plan (2016). Both Action Plans proposed that developments should be required to provide charging points based on the number of standard car parking spaces provided. This is seen as key in helping reduce emissions of nitrogen oxides and improving air quality within Bath City Centre and encouraging the use of low emission means of transport within Keynsham and Saltford.

8.16.5 The standards in the Parking Strategy for 'active' and 'passive' provision are principally aimed at increasing the uptake of electric vehicles within B&NES in order to minimise the impact of vehicle emissions on air quality:

8.16.6 These standards are at the same level as those set out by the 2016 London Plan and are expressed as minimum provisions.

8.16.7 The West of England UAs are now working together to establish a consistent policy approach to the provision of ULEV infrastructure in their respective Local Plans. Work on this is still underway and the UAs are seeking to be as ambitious as possible

in requiring active and passive ULEV infrastructure in all new development proposals. As a result of discussions and a review of best practice the UAs emerging policy approach is being developed with an initial policy approach outlined in DM16.

8.16.8 It may be necessary to provide further technical guidance on the Council's recommended best practice for the provision of electric vehicle charging infrastructure and the recommended minimum specification including who bears the cost of changing from passive to active charging infrastructure. The Council will also be considering whether to stipulate that any EV parking spaces should be included within the maximum parking provision and not in addition to it.

8.17 WoE Green Infrastructure Plan and Local Plans

8.17.1 The West of England (WoE) Authorities recognise the critical role that a healthy, functioning natural environment and multi-functional green infrastructure plays in supporting sustainable growth and communities. The Joint Spatial Plan commits the authorities to develop a WoE Green Infrastructure (GI) Plan and to delivering a 'net gain' for the environment.

8.17.2 The local authorities recognise that green infrastructure needs to be strategically planned, managed and funded like other essential infrastructure and will set out delivery mechanisms for achieving this.

8.17.3 The WoE GI Plan is currently being developed and will provide evidence and guidance to support the preparation of the Local Plans including specific Habitats Regulations Assessment (HRA) / Appropriate Assessment (AA) requirements and green infrastructure standards.

8.17.4 The West of England (WoE) Green Infrastructure Plan will:

- Provide maps to show WoE Strategic GI corridors and opportunities, incorporating the WoE Ecological Network Map (that will link to Ecological Network under Policy NE5, see page 163).
- Provide the evidence base to assess local GI (that will link to Green infrastructure Policies CP7/NE1, see page 156).
- Set out HRA/AA requirements for specific JSP SDLs in respect of the bats and recreational impact (and will link to Policy NE3, see page 162).
- Set out HRA/AA criteria for assessing whether development will be subject to the bat/recreational impact consideration.
- Set out GI standards including access to green space/natural green space drawing on Natural England's ANGst (Accessible Natural Greenspace Standard). This work will also assist the review of the B&NES Green Infrastructure Strategy and Green Space Strategy.

8.17.5 The WoE GI Plan will help ensure the important role the natural environment has in placemaking

is understood meaning green infrastructure is fully integrated in plan-making and the current GI policies are reviewed in line with the new NPPF and the Government's commitment to improve the natural environment (see Policy CP7 in the Review of existing Development Management policies on page 156)

8.17.6 The Government has made a commitment to achieve measurable improvements for the environment – 'environmental net gains' – while ensuring economic growth and reducing costs, complexity and delays for developers through its 25 Year Environment Plan (2018). Actions include:

- producing stronger new standards for green infrastructure;
- exploring potential of district protected species licensing to be expanded and include more species,
- delivering better outcomes for wildlife and a more streamlined process for development; and
- working with interested parties to reduce costs to developers by expanding the net gain approaches used for wildlife to also include wider natural capital benefits such as flood protection, recreation and improved water and air quality - streamlining environmental process, whilst achieving net environmental gains.

8.18 Viability

8.18.1 The 2018 NPPF makes it clear that viability should principally be assessed and tested through preparing the Local Plan, in order to establish that the various policy requirements can be met whilst also viably delivering development. If the Local Plan is supported by an up to date and robust assessment of viability, testing viability in relation to a development proposal at the application stage is not necessary unless the applicant can demonstrate that specific circumstances require it.

8.18.2 National Planning Practice Guidance (NPPG) which accompanies the NPPF also sets out guidance on a more standardised approach to assessing viability, including the setting of development costs and values. There is concern within B&NES (as amplified in the Placemaking Plan) that applicants are seeking to demonstrate that it is not viable for them to meet policy requirements, e.g. relating to affordable housing, primarily because the price at which they have bought the site does not adequately take into account the requirements of the Plan. The NPPG makes it clear that under no circumstances will the price paid for land be a relevant justification for failing to accord with relevant policies in the plan. The Council will ensure that site requirements are clearly articulated in the Plan and land owners and the development industry are fully aware of them. In addition the viability assessment used to inform preparation of the Local Plan will be based on realistic costs and values (including using market evidence). In establishing both costs and values to inform the Local Plan viability assessment the Council will engage with landowners, developers, and infrastructure and affordable housing providers. In addition and based on the NPPF plan-making approach to viability it is proposed

that policies will not generally refer to viability related exemptions to their requirements.

DM17 Review of existing Development Management policies

Please make sure you specify which policy you are commenting on when responding.

8.19 Review of existing Development Management policies

8.19.1 The following section sets out all existing Development Management policies from the Core Strategy (2014) and the Placemaking Plan (2017), together with a commentary on how or whether these are intended to be taken forward in the Draft Local Plan.

8.19.2 Where there is no change in circumstances to warrant significant policy review, it is proposed to take the policies listed forward with some amendments where necessary for the purposes of clarification (in the light of best practice, updated guidance etc.) as outlined in the tables below. This includes the remaining saved Local Plan policies (2007).

8.19.3 Those policies where a change in approach is proposed are highlighted in the commentary box. The proposed approach for each of these policies, with options where suggested, is discussed in the Development Management Policies chapter.

8.19.4 Through this consultation there is opportunity to comment on the proposed approach for each policy (see note below). All policies will be presented in full in the Draft Local Plan and may be renumbered.

8.20 Core Strategy Policies (2014)

SD1 Presumption in favour of Sustainable Development

Proposed approach: The presumption in favour of sustainable development remains central to national planning policy and an important consideration in determining planning applications. No amendments currently proposed - policy remains relevant and fit for purpose.

CP1 Retrofitting Existing Buildings

Proposed approach: Policy CP1 sets out the approach to retrofitting for all existing buildings, including historic buildings. No amendments currently proposed - policy remains relevant and fit for purpose.

CP2 Sustainable Construction

Proposed approach: It is proposed that Policy CP2 is reframed and tightened by removing reference to elements of the policy which are covered by other policies (e.g.

renewable energy: SCR1 and conserving water resources: SCR5) and aligned with the forthcoming Sustainable Construction SPD to ensure that the headline requirements are explicit in the policy, including the thresholds. This will also include reference to overheating and the cooling hierarchy and strengthening the approach to recycling construction, demolition and excavation waste. Consideration is being also given to requiring the applicant to demonstrate that embodied carbon dioxide emissions will be minimised by undertaking an embodied carbon assessment in line with a nationally recognised methodology for schemes over a certain size (to be determined). This is in line with the approach the London Plan Is considering.

CP3 Renewable Energy

Proposed approach: It is proposed that the existing electricity and heat targets are rolled forward and dates extended to 2036 as these are still valid. It is also proposed that the policy should make reference to on-site battery storage as a means of increasing on-site renewable energy consumption, providing in-situ energy demand management which can reduce pressure on the national grid during peak time, and increase the efficiency of energy supply. This is in line with the approach the London Borough of Merton is pursuing in particular, linking battery use to the installation of solar PV.

CP4 District Heating

Proposed approach: Policy CP4 seeks to encourage the use of combined heat and power (CHP), and/or combined cooling, heat and power (CCHP) and district heating. Consideration is being given to a more criteria-based approach for a heat network e.g. use, type and density and a review of the heat hierarchy that expects the use of renewable heat sources and discourages fossil fuelled heating and non-renewable electric heating.

CP5 Flood Risk Management

Proposed approach: The approach to flood risk management as set out in Policy CP5 is consistent with national policy. No amendments currently proposed - policy remains relevant and fit for purpose. The supporting text will be updated to align with the revised NPPF.

CP6 Environmental Quality

Proposed approach: Consideration is being given to amending or disaggregating Policy CP6, a high level policy, to ensure it is suitably aligned with the related Placemaking Plan policies (design, historic environment, landscape and nature conservation) for the purposes of clarity.

CP7 Green infrastructure

Proposed approach: It is proposed to combine Policies CP7 and NE1 into one policy and amend, as necessary, to reflect guidance in the emerging West of England Green Infrastructure Plan This work will also inform any revisions to diagrams and to the Policies Map.
Reference will also be made to the River Avon Park and how best to ensure new development proposals relate to and complement this asset.

CP8 Green Belt

Proposed approach: Policy CP8 ensures that openness of the Green Belt will be protected from inappropriate development in accordance with national planning policy. It is proposed to amend the policy wording to also refer to the protecting the permanence of the Green Belt and the purposes of including land within it. This will help ensure greater clarity and consistency with national policy.

CP8a Minerals

Proposed approach: Policy CP8A sets out the strategic approach to minerals in the District and seeks to ensure that mineral resources within the District continue to be safeguarded. No amendments currently proposed - policy remains relevant and fit for purpose.

CP9 Affordable Housing

Proposed approach: Policy CP9 will be amended to ensure alignment with Policy 3 (Affordable Housing) in the West of England Joint Spatial Plan. Within this context other amendments will be made to reflect the changes to the affordable housing elements of the revised NPPF. Consideration will be given to whether the policy should include the Council's approach to Vacant Building Credit and making the section on sub-division and phasing clearer.

CP10 Housing mix

Proposed approach: Policy CP10 is aimed at ensuring that new residential development provides for a range of housing types and needs. Policy CP10 will be reviewed in the light of the Strategic Housing Market Assessment (SHMA) Part 2. Guided by the SHMA and local needs assessments, consideration will be given to whether the policy could be more specific with regard types of housing mix needed for different geographical areas.

CP11 Gypsies, travellers & travelling showpeople

Proposed approach: Policy CP11 represents a comprehensive framework for considering the merits of traveller site proposals. No amendments currently proposed - policy remains relevant and fit for purpose.

CP12 Centres and Retailing

Proposed approach: Consideration is being given to amending/ strengthening wording of Policy CP12 to address the potential for mixed-use / higher density development; securing a high quality environment; sustainable access; embedding the Healthy Streets approach; local identity and sense of place; barrier-free and inclusive environments; maximising footfall; safety and security. It is proposed to review the list of local centres to ensure list is up to date.

CP13 Infrastructure provision

Proposed approach: Policy CP13 also requires that new development is supported by the timely delivery of physical infrastructure necessary to support that development. No amendments currently proposed - policy remains relevant and fit for purpose.

RA3 Community Facilities

Proposed approach: Policy RA3 supports the development of community facilities within and adjoining all villages consistent with national policy. However, consideration will be given to absorbing this policy into Policy LCR2 as both policies cover proposals for the development of community facilities.

RA4 Rural Exception Sites

Proposed approach: Revised approach is discussed on page 136.

8.21 Placemaking Plan Policies (2017)

SCR1 On-site Renewable Energy Requirement

Proposed approach: Revised approach is discussed on page 130.

SCR2 Roof-Mounted/Building-Integrated Scale Solar PV

Proposed approach: Policy SCR2 sets out guidance for roof-mounted solar photovoltaic (PV) panels in cases where planning permission is required. No amendments currently proposed - policy remains relevant and fit for purpose.

SCR3 Ground Mounted Solar Arrays

Proposed approach: Policy SCR3 provides guidance for planning applications for ground-mounted solar arrays (solar farms/solar fields) that can make a significant contribution to our renewable energy target (Policy CP3). It is proposed to amend clause (a) to make it clear that proposals should avoid the best and most versatile agricultural land and to consider whether it is necessary to make reference to pre-application engagement in the policy.

SCR4 Community Renewable Energy Schemes

Proposed approach: Policy SCR4 aims to support the delivery of community renewable energy schemes and the broader community involvement that they bring in line with the approach set out in the Department of Energy & Climate Change's Community Energy Strategy. No amendments currently proposed - policy remains relevant and fit for purpose.

SCR5 Water Efficiency

Proposed approach: Policy SCR5 sets out the requirements in respect of water efficiency in dwellings. It is proposed, for the purposes of clarity, that the policy is amended to confirm that all new dwellings will be required to meet the optional standard of 110 litres. The supporting text will also be amended to make it clear that this requirement will be implemented via a planning condition and the imposition of such a condition is the means by which the Building Regulations are applied.

SU1 Sustainable Drainage

Proposed approach: Consideration is being given to amending Policy SU1 to provide greater clarity on the type of SUDS infrastructure required. To ensure consistency with the revised NPPF (para 165) the policy also needs to make it clear that major

development should incorporate SUDs unless there is clear evidence it would be inappropriate.

D1 General Urban Design Principles

Proposed approach: Policy D1 sets out the general urban design principles that will be applied at a high level. These are particularly relevant for large development sites or Masterplans, but apply equally to all development scales. Consideration is being given to amending the policy to recommend that Masterplans and Design Codes are developed for major schemes to ensure delivery of high quality design and place making. Reference can also be made to the following in the supporting text:

- Design scrutiny – covering Design and Access Statements and Design Review.
- Maintaining Design Quality – to ensure the design quality of development is retained through permission to completion.
- Consideration will also be given to making it clear (either in the policy or supporting text) that applicants will be expected to demonstrate that they have undertaken early, proactive and effective engagement with the community that will be affected by their proposals and show that their views have been taken into account in evolving designs.

D2 Local Character and Distinctiveness

Proposed approach: Consideration is being given to amending Policy D2 to give greater detail on maximising densities; potential restrictions such as excessive building heights (in particular, referencing the Building Heights Strategy which is likely to be absorbed into an emerging Design SPD) and to cross refer to the green infrastructure policies and local food growing/allotment policies.

D3 Urban Fabric

Proposed approach: Consideration is being given to amending Policy D3 to refer to the importance (in design terms) of providing a range/ mix of housing typologies and tenures on development sites; minimum space standards for residential development; dual aspect versus single aspect dwellings; cross-referring to Policy CP4 and the 'thermal masterplanning approach'.

D4 Streets and Spaces

Proposed approach: Consideration is being given to amending Policy D4 by renaming the policy 'Healthy Streets and Spaces' and reflects the Healthy Streets approach; requiring form and layout should facilitate efficient servicing and maintenance of buildings and public realm; emphasising the importance of delivering the highest standards of accessible and inclusive design.

D5 Building Design

Proposed approach: Consideration is being given to whether Policy D5 needs amending to refer to fire safety considerations within buildings or whether this is sufficiently covered by Building Regulations (e.g. post Grenfell). See also D4 above.

D6 Amenity

Proposed approach: Consideration

is being given to amending Policy D6 (or alternatively Policy PCS2) to introduce an 'Agent of Change' requirement whereby existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established as per the revised NPPF, para 182.

The Council's Waste Services have encountered operational issues associated with providing refuse and recycling collection for new developments in the district. It is therefore proposed that the policy text is amended to make more explicit reference to developments being required to address these issues. Consideration will also be given to updating the policy to refer to access arrangements for waste collection, appropriate highways design, developer responsibility for provision of waste facilities on new development and operational arrangements for waste collections during the construction phase for larger developments. The policy could be accompanied by updated Waste Planning Guidance currently being produced.

D7 Infill and Backland Development

Proposed approach: Policy D7 relates specifically to infill and backland development. It applies to all parts of the district both urban and rural, and emphasises the importance of an approach based on a sound understanding of character and context. No amendments currently proposed - policy remains relevant and fit for purpose.

D8 Lighting

Proposed approach: A minor amendment will be proposed to Policy D8 to reflect guidance in the 'WaterSpace Design Guidance - Protecting bats in waterside development (June 2018)'

D9 Advertisements & Outdoor Street Furniture

Proposed approach: It is proposed that Policy D9 will amended to apply to all advertisements requiring consent rather than just commercial premises to align with national planning practice guidance on advertisements.

D10 Public Realm

Proposed approach: Consideration is being given to amending Policy D10 to give more detail on public realm considerations / requirements and whether this policy should refer to designing out risks to public realm, such as deterring terrorism.

HE1 Historic Environment

Proposed approach: Policy HE1 sets out the circumstances in which development proposals affecting the historic environment will be considered. It reflects national policy and guidance and supports the Core Strategy's strategic policies for the historic environment and its positive approach to the conservation of the District's heritage assets. Consideration will be given to including reference to settings of historic assets in the policy especially in respect of the World Heritage Site.

HE2 Somersetshire Coal Canal and the Wansdyke

Proposed approach: Policy HE2 seeks to protect the physical remains of the

Somersetshire Coal Canal and the Wansdyke and their settings from the adverse effects of development proposals within the context of Policy HE1. No amendments currently proposed - policy remains relevant and fit for purpose.

NE2 Conserving and Enhancing the Landscape and Landscape Character

Proposed approach: It is proposed to amend Policy NE2 so that it also relates to Areas of Outstanding Beauty and consideration will be given to whether it is necessary to include the reference to the Landscape and Visual Impact Assessment as a requirement in the policy as this is already covered in the supporting text and is a matter for the Local Validation Checklist. Consideration is also being given to the requirement for landscape sensitivity assessments for certain development proposals pending publication of Natural England's Landscape Sensitivity Assessment guidance and for photomontages to be required in accordance with the forthcoming Landscape Institute guidance.

Table 6 (Key Factors which Contribute to the District's Distinct Character) will be amended to make reference to other assets including the AONBs and the WHS attributes.
Supporting text to be updated to include reference to 'Bathscape Landscape Character Assessment'. Given the increasing concerns over the cumulative impact of development on the landscape setting of Bath and the World Heritage Site and its setting consideration will be given to making reference to addressing this through the relevant policies in the Local Plan, such as NE2, NE2A and B4.

NE2A Landscapes setting of settlements

Proposed approach: Policy NE2A seeks to protect, conserve and enhance the landscape setting of settlements as defined on the Policies Map. No amendments currently proposed - policy remains relevant and fit for purpose.

NE2B Extension of residential curtilages In the countryside

Proposed approach: Policy NE2B provides specific control over the enlargement of residential gardens in the countryside. No amendments currently proposed - policy remains relevant and fit for purpose.

NE3 Sites, Species and Habitats

Proposed approach: Consideration is being given to moving Policy NE5 to follow Policy NE3. Other minor amendments to Policy NE3 may be necessary for the purposes of clarity, in particular, to make it clear in clause 4. (d) (ii) that 'provision is made for the management of and reporting of retained and created habitat features. Within the context of the emerging Wests of England Green Infrastructure Plan it will necessary for the Local Plan to respond to recommendations and guidance on how to address the impacts from increased recreational pressures and habitat fragmentation resulting from new housing provision on ecological sites, in particular on European sites. Strategic mitigation solutions are being developed and will need to be addressed through the Local Plan.
In view of the changes to the

NPPF regarding strengthening the protection of irreplaceable habitats it will be necessary to review the precise wording of NE3 and consider amending clause 1 to add “and irreplaceable habitats” after “their habitats”. It may also be necessary to review the development capacity of existing site allocations where irreplaceable habitat is known to occur.

NE4 Ecosystem Services

Proposed approach: Consideration is being given to reframing Policy NE4 so that it clearer what is meant by Ecosystem Services and what would be required in order to deliver Ecosystem Services in an effective way.

NE5 Ecological Networks

Proposed approach: See NE3 above.

NE6 Trees and woodland conservation

Proposed approach: Policy NE6 seeks to protect trees and woodland from the adverse impact of development by setting out criteria against which proposals will be assessed. No amendments currently proposed - policy remains relevant and fit for purpose.

NE1 Development and Green Infrastructure

Proposed approach: See CP7 and NE3 above.

GB1 Visual Amenities of the Green Belt

Proposed approach: It is proposed to delete Policy GB1 on the basis that visual amenities of the Green Belt are protected by other policies (NE2, D1, D2, HE1, etc.).

GB2 Development in Green Belt Villages

Proposed approach: Revised approach is discussed on page 143.

GB3 Extensions and Alterations to Buildings in the Green Belt

Proposed approach: Policy GB3 will only allow the extension or alteration of a building in the Green Belt provided that it does not result in disproportionate additions over and above the size of the original building. The justification for this approach is the significant number of householder applications in the Green Belt in B&NES. Where planning permission is required to extend buildings a balance should be taken between the accommodation needs of householders and business against the desire to avoid the gradual erosion of the countryside and identity and character of settlements, contrary to the purposes of the Green Belt.

Consideration will be given to reframing the policy to provide greater clarification regarding matters such as percentage above which extensions are deemed disproportionate additions, and how to deal with detached outbuildings.

Pollution, contamination and safety:

- PCS1 Pollution and nuisance
- PCS2 Noise and vibration

- PCS3 Air quality
- PCS4 Hazardous substances
- PCS5 Contamination
- PCS6 Unstable land
- PCS7 Water Source Protection Zones
- PCS7A Foul sewage infrastructure
- PCS8 Bath Hot Springs

Proposed approach: This suite of policies is consistent with the NPPF in seeking to prevent new and existing development from contributing to or being put at unacceptable risk from, or adversely affected by unacceptable levels of soil, air, water or noise pollution. No amendments currently proposed (other than in respect of Policy PCS2, see D6 above and a minor amendment to Policy PCS1 to insert 'and/or' between clauses 1 and 2 for clarification purposes) - these policies remain relevant and fit for purpose.

The supporting text to Policy PCS6 will be updated to make greater reference to the issue of landslip and development.

H1 Housing and Facilities for the Elderly, People with Other Supported Housing or Care Needs

Proposed approach: Revised approach is discussed on page 140.

H2 Houses in Multiple Occupation

Proposed approach: Houses in Multiple Occupation (HMO) given the large student population. Policy H2 sets out criteria for determining applications for the change of use from residential to a HMO and will be aligned with adopted SPD. Consideration is being given whether policy should apply to new HMOs or extensions to existing HMOs.

H3 Residential Uses in Existing Buildings

Proposed approach: Policy H3 sets out the circumstances in which the sub-division of existing residential properties will be acceptable. It is proposed to update clause 1) to refer to the proposal not having unacceptable impact on highways safety or a severe impact upon residual cumulative impact on the road network instead of referring to a severe transport impact to bring the policy into line with the NPPF.

H4 Self-build

Proposed approach: Revised approach is discussed on page 139.

H5 Retention of Existing Housing Stock

Proposed approach: Given the high demand for housing in B&NES, Policy H5 seeks to protect existing housing stock from change of use, where possible. However, it is proposed to provide clarification in the policy as to what is meant by 'residential accommodation' in the context of this policy i.e. the loss of residential dwellings.

H6 Moorings

Proposed approach: Policy H6 guides proposals for new and additional moorings to the most sustainable locations where there is easy access to necessary services and facilities. No amendments currently proposed - policy remains relevant and fit for purpose.

H7 Housing Accessibility

Proposed approach: Revised approach is discussed on page 141.

H8 Affordable Housing Regeneration Schemes

Proposed approach: Revised approach is discussed on page 137.

LCR1 Safeguarding Local Community Facilities

Proposed approach: Policy LCR1 seeks to safeguard against the loss of valued community facilities. No amendments currently proposed - policy remains relevant and fit for purpose.

LCR1A Public houses

Proposed approach: Policy LCR1A sets out the circumstances in which the loss of a public house to another use might be considered acceptable. Within the context of national policy consideration will be given to whether the policy should apply to all pubs rather than just pubs which are 'valued community facilities' and whether the policy should also be extended to cover developments which directly threaten the viability of a public house.

LCR2 New or Replacement Community Facilities

Proposed approach: Consideration is being given to amending Policies LCR2 and LCR6 to make clear that new facilities should be easily accessible by public transport, cycling and walking. Policy LCR2 will also be reviewed in the context of the revised NPPF, para 84 in considering sites beyond existing settlements, and in locations that are not well served by public transport. However, consideration will also be given to absorbing Policy RA4 into Policy LCR2 as both policies cover proposals for the development of community facilities.

LCR3 Land Safeguarded for Primary School Use

Proposed approach: It is proposed that Policy LCR3 is updated to ensure the list of sites safeguarded for primary school purposes is correct at the time the Draft Local Plan is published.

LCR3A Primary School Capacity

Proposed approach: It is proposed that the approach to determining proposals for residential development as set out in Policy LCR3A will be reviewed once the spatial strategy for non-strategic development is established.

LCR4 Allocation of land for cemeteries

Proposed approach: Policy LCR4 safeguards land for the extension of cemeteries at Haycombe Cemetery and the cemetery at Eckweek Lane to ensure future needs are met. No amendments currently proposed - policy remains relevant and fit for purpose.

LCR5 Safeguarding Existing Sport & Recreational Facilities

Proposed approach: Policy LCR5 safeguards against the loss of recreational space, land and buildings

used for sport and recreation as shown on the Policies Map. No amendments currently proposed to the policy wording which remains relevant and fit for purpose. However, consideration will be given to restricting what is shown on the Policies Map to just those areas subject to the standards set out in the Green Space Strategy used for assessing needs and deficiencies.

LCR6 New and Replacement Sports and Recreational Facilities

Proposed approach: It is proposed to amend Policy LCR6 to ensure reference to natural open space is added to link with the standards in the Green Space Strategy. Add title before final paragraph to ensure developers are clear when contributions are required. See also LCR2 above.

LCR6A Local Green Spaces

Proposed approach: Consistent with the NPPF, Policy LCR6A provides special protection to qualifying Local Green Spaces as shown on the Policies Map. No amendments currently proposed - policy remains relevant and fit for purpose. However, there is an opportunity for communities to submit further green spaces that are demonstrably special to the local community to be designated as LGS.

LCR7 Recreational development proposals affecting waterways

Proposed approach: Policy LCR7 sets out the circumstances in which recreational development affecting waterways would be acceptable. Recreational development proposals should be carefully controlled to avoid the gradual erosion of the inherent character of the River, Canal and Lakes and their immediate environment and are either within the Green Belt and/or the AONBs. No amendments currently proposed - policy remains relevant and fit for purpose.

LCR7A Telecommunications development

Proposed approach: Consideration is being given to amending Policy LCR7A to cover 5G infrastructure. It is also proposed that the policy and/or supporting text is updated to reflect the revised NPPF, para 115.

LCR7B Broadband

Proposed approach: The purpose of Policy LCR7B is to ensure that the suitable broadband infrastructure is incorporated at the design stage of a proposal so that it is fully integrated alongside other service provision. This will not only ensure that the development is able to accept and adopt future technological improvements but also obviate the need to upgrade at a later date. Compliance with Part R of the Building Regulations, on the other hand, will ensure that a new building (or major renovation works to a building) is equipped with a high-speed- ready in-building physical infrastructure (from the service provider's access point to the occupier's network termination point) up to a network termination point for high-speed electronic communications networks.
It is proposed to amend the policy to provide greater clarity of what is required of developers.

Consideration is also being given to whether a guidance note is needed.

LCR7C Commercial riding establishments

Proposed approach: Policy LCR7C sets out the requirements for considering proposals for commercial riding establishment whilst seeking to prevent to ensure that equestrian activities do not have an adverse impact on the appearance of the countryside. No amendments currently proposed - policy remains relevant and fit for purpose.

LCR8 Protecting allotments

Proposed approach: Policy LCR3 seeks to protect against the loss of allotment land. No amendments currently proposed - policy remains relevant and fit for purpose.

LCR9 Increasing the Provision of Local Food Growing

Proposed approach: Policy LCR9 will be amended to remove references to the B&NES Allotment Design Guide and consideration will be given to providing high level design requirements/ guidance within the policy to reflect best practice. Consideration will also be given to making simplifying clause 3 less prescriptive by replacing 'will be expected to incorporate…' with 'should provide opportunities for informal food growing, wherever possible'.

ED1A Office Development

Proposed approach: Policy ED1A will allow office development proposals within city and town centre boundaries, or on sites allocated for this use in principle. No amendments currently proposed - policy remains relevant and fit for purpose.

ED1B Change of Use & Redevelopment of B1(a) Office to Residential Use

Proposed approach: Revised approach is discussed on page 146.

ED1C Change of Use and Redevelopment of B1(a) Office Use to Other Town Centre Use

Proposed approach: Policy ED1C allows the change of use of office space to A1, A2 and A3 uses subject to the terms of Policy ED1B but resists the change of use or redevelopment of office space to other town centre. Policy ED1C will be amended to reflect any changes to Policy ED1B (see page 146).

ED2A Strategic and Other Primary Industrial Estates

Proposed approach: Revised approach is discussed on page 145.

ED2B Non-strategic Industrial Premises

Proposed approach: Revised approach is discussed on page 145.

RE1 Employment Uses in the Countryside

Proposed approach: It is proposed that Policy RE1 is amended to ensure make it clear that it also covers the conversion of existing buildings in the countryside and to ensure consistency with the revised NPPF, para 84. This may include a review of

Policy RE6 to avoid any ambiguity.

RE2 Agricultural development

Proposed approach: Policy RE2 sets out the local circumstances within which proposals for agricultural development would be acceptable. No amendments currently proposed - policy remains relevant and fit for purpose.

RE3 Farm diversification

Proposed approach: Policy RE3 sets out the circumstances within which proposals for farm diversification would be acceptable. It seeks to prohibit activities that lead to the fragmentation or severance of a farm holding or compromise agricultural function. No amendments currently proposed - policy remains relevant and fit for purpose.

RE4 Essential dwellings for rural workers

Proposed approach: Policy RE4 provides the parameters within which Essential Dwellings for Rural Workers will be allowed in line with the NPPF. The policy will be amended to reflect the revised NPPF, in particular, to make reference to those taking majority control of a farm business. Consideration will also be given to whether it is necessary to provide clarity on how successors taking over from retiring famers will be dealt with.

RE5 Agricultural land

Proposed approach: Policy RE5 exists to protect the best and most versatile agricultural land as well as supporting development that enhances local food production and processing. No amendments currently proposed - policy remains relevant and fit for purpose.

RE6 Re-use of Rural Buildings

Proposed approach: See RE1 above. Policy RE6 applies to proposals for the reuse of rural buildings that require planning permission. It is proposed that clarify definition of a rural building (location or use).

RE7 Visitor Accommodation

Proposed approach: Consideration is being given to clarify whether the change of use from a dwelling to visitor accommodation relates to the sub-division of a dwelling to create visitor accommodation.

CR1 Sequential Test

Proposed approach: Policy CR1 reflects the requirements for Local Plan to apply the Sequential Test for retail developments outside centres. It is proposed to amend the policy to reflect changes in the revised NPPF to make it clear that 'availability' in terms of the sequential test is now based on a 'reasonable period' of time.

CR2 Impact Assessments

Proposed approach: Policy CR2 is compliant with the NPPF by requiring an impact assessment for development over a proportionate, locally set floorspace threshold when assessing applications for retail, leisure and office development outside of town centres. No amendments currently proposed - policy remains relevant and fit for

purpose.

CR3 Primary Shopping Areas and Primary Shopping Frontages

Proposed approach: Policy CR3 introduces a flexible approach in relation to Primary Shopping Frontages by allowing the Local Planning Authority to maintain a primary shopping function in the defined frontages whilst allowing other Class A uses which can also add to the attractiveness of, and vitality within, a town centre. Policy CR3 applies to all centres within the hierarchy identified in Policy CP12. Consideration will be given to whether there is sufficient justification to continue defining primary frontages in the context of the revised NPPF.

CR4 Dispersed Local Shops

Proposed approach:Policy CR4 supports proposals for appropriately located small-scale local needs shops and prevents the change of use of an existing local shop unless it can be justified. It is proposed that this policy is amended so that it only relate to small-scale local shops (A1 Use Class).

ST1 Promoting Sustainable Travel

Proposed approach: Consideration is being given to updating Policy ST1 to reflect the Healthy Streets Approach. This puts people, and their health, at the heart of decision making and results in healthier, more inclusive places where people choose to walk, cycle and where possible use public transport.

ST2 Sustainable Transport Routes

Proposed approach: Policy ST2 seeks to prevent development which prejudices the use of routes for sustainable transport purposes as shown on the Policies Map. It will also be clarified that the term 'prejudices' in this context will also include enabling/facilitating the delivery of routes.

Consideration is also being given to removing specific reference to former railway land as this is only one type of route. This could be replaced by referring to routes suitable for sustainable transport purposes to align with the definition of Sustainable Transport in the Glossary which refers to 'Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra-low emission vehicles, car sharing and public transport'. Other key routes such as Kennet & Canal towpath and Bath River Line are also likely to be safeguarded under this policy.

ST2A Recreational Routes

Proposed approach: Policy ST2A seeks to ensure that any publicly accessible routes are not adversely affected by development proposals. No amendments currently proposed - policy remains relevant and fit for purpose.

ST3 Transport infrastructure

Proposed approach: Policy ST3 seeks to ensure that transport infrastructure is designed to the highest standards possible. No amendments currently proposed - policy remains relevant and fit for purpose.

ST4 Rail freight facility

Proposed approach: Policy ST4 safeguards land at Westmoreland Station Road, Bath as a rail freight facility and interchange consistent with the NPPF. No amendments currently proposed - policy remains relevant and fit for purpose.

ST5 Traffic Management Proposals

Proposed approach: Policy ST5 provides specific guidance for traffic management proposals and sets the high level principles within which more tailored traffic management schemes may be devised. No amendments currently proposed - policy remains relevant and fit for purpose.

ST6 Park and Ride

Proposed approach: Policy ST6 will be used to assess any future Park and Ride schemes, both extensions to existing sites and new schemes. No amendments currently proposed - policy remains relevant and fit for purpose.

ST7 Transport Requirements for Managing Development

Proposed approach: Revised approach is discussed on page 149.

ST8 Airport and Aerodrome Safeguarding Areas

Proposed approach: Policy ST8 will not allow development that would prejudice air safety or the optimum use of the facility within the airport/ aerodrome safeguarding areas as defined by the Civil Aviation Authority (CAA). No amendments currently proposed - policy remains relevant and fit for purpose.

M1 Mineral Safeguarding Areas

Proposed approach: Policy M1 clarifies how applications for non-mineral development within Mineral Safeguarding Areas will be considered as required by the NPPF. No amendments currently proposed - policy remains relevant and fit for purpose.

M2 Minerals Allocations

Proposed approach: Policy M2 allocated sites for mineral extraction and sets out the approach for mineral proposals outside these areas and their respective areas of search. No amendments currently proposed - policy remains relevant and fit for purpose.

M3 Aggregate Recycling Facilities

Proposed approach: Policy M3 clarifies the policy approach to considering proposals for aggregate recycling facilities. No amendments currently proposed - policy remains relevant and fit for purpose.

M4 Winning and working of minerals

Proposed approach: Policy M4 sets out the framework for considering proposals for the winning and working of minerals and ancillary minerals development. No amendments currently proposed - policy remains relevant and fit for purpose.

M5 Conventional and unconventional Hydrocarbons

Proposed approach: Policy M5 employs the precautionary principle in setting out a stringent framework within which Development involving the exploration and/or appraisal of oil and gas resources will be considered. No amendments currently proposed - policy remains relevant and fit for purpose.

8.22 Saved Local Plan Policies (2007)

GDS.1 Site requirements

Proposed approach: Policy GDS.1 is the parent policy for the site allocations listed. It is proposed that this policy is retained to support the delivery of the sites listed below.

- Site K2. South West Keynsham
- Site NR2. Radstock Railway Land, Norton-Radstock
- Site V3. Paulton Printing Factory
- Site V8. Former Radford Retail System's Site, Chew Stoke

Proposed approach: An element(s) of these schemes are still to be completed. These site allocations will be retained until such time they are competed to ensure the remaining development of the site takes place in accordance with the site requirements.

9. Glossary

Advertisement

For planning purposes, 'advertisement' as:
'any word, letter, model, sign, placard, board, notice, awning, blind, device or representation, whether illuminated or not, in the nature of, and employed wholly or partly for the purposes of, advertisement, announcement or direction, and (without prejudice to the previous provisions of this definition) includes any hoarding or similar structure used or designed, or adapted for use and anything else principally used, or designed or adapted principally for use, for the display of advertisements.' (Section 336(1) of the Town and Country Planning Act 1990 (as amended)

Active Frontage

Making frontages 'active' adds interest, life and vitality to the public realm. This means:

- Frequent doors and windows, with few blank walls;
- Narrow frontage buildings, giving vertical rhythm to the street scene;
- Articulation of facades, with projections such as bays and porches incorporated, providing a welcoming feel; and on occasion,
- Lively internal uses visible from the outside, or spilling onto the street.

Active Ground Floor Use (within designated centres)

Active ground floor uses within designated centres (defined in Policy CP12) are generally considered those falling within Use Classes A1 to A5 but can also include other town centre uses which are visited by large numbers of people. Residential uses and offices (Use Class B1) would not normally be considered as active uses for ground floors in this context (but could contribute to the active frontage by having a front door to a residential or office use on upper floors).

Aggregates

Sand, gravel, crushed rock and other bulk materials which are suitable for use in the construction industry as concrete, mortar, finishes or roadstone or for use as a constructional fill or railway ballast

Air quality management areas

Areas designated by local authorities because they are not likely to achieve national air quality objectives by the relevant deadlines. [Source NPPF]

Allowable Solutions

This is a mechanism for developers to pay into a carbon reduction fund via the S106 process to install offsite carbon saving measures if it is not viable to deliver the full carbon savings onsite. These funds can be used to retrofit existing housing stock, tackling fuel poverty, or for renewable energy projects.

Authorities Monitoring Report (AMR)

The requirement for a local authority to produce an Authority Monitoring Report is set out in Section 113 of the Localism Act 2011. The Act requires every authority to produce a series of reports containing information on the implementation of the Local Development Scheme, the progress and effectiveness of the Local Plan, and the extent to which the planning policies set out in the Local Plan documents are being achieved.

Brownfield land or site

See previously developed land.

Commercial Leisure

The term 'commercial leisure' generally applies to multiplex cinemas, bingo halls, nightclubs, tenpin bowling, indoor sports facilities including health and fitness centres, pubs, restaurants and casinos. It includes commercial providers of sporting and leisure opportunities but generally excludes public and voluntary sectors and professional sports clubs. These types of commercial developments tend to attract large numbers of people, which can give rise to traffic, parking, environmental and amenity problems.

Community facilities

For the purposes of the Local Plan community facilities comprise a wide range of social, cultural facilities and services necessary to sustain community needs and support healthy lifestyles.

Conservation Area

An area of special architectural and/or historical interest, the character or appearance of which it is desirable to preserve or enhance.

Coal bed Methane

Methane that is extracted from unworked coal seams. The extraction of coal bed methane is usually from one of two sources most commonly directional drilling along a coal seam or drilling vertically into a coal seam (making use of pre-existing fracture patterns). The water in the coal seam is pumped out to the surface with the methane following. Coal bed methane doesn't usually involve fracking as the coal seams are less dense than the shale rock. However, fracking would be required if the gas could not be extracted solely by pumping. To date in the UK there has been no commercial exploitation of coal bed methane.

Core Strategy

The long-term spatial vision and strategy for the area, including the key strategic policies and proposals to deliver that vision.

Developer Contributions

Contributions from development proposals towards the provision of infrastructure or services necessary to serve the development. This is now commonly a standard planning requirement which is typically secured by legal agreements. Contributions may be either financial or by direct provision of works or land by the developer towards facilities such as schools, affordable housing and transport improvement etc. Often referred to as Planning Obligations or Section 106 Agreements.

Embodied energy

Embodied energy is the amount of resources consumed to produce a material. Production includes the growing or mining and processing of the natural resources and the manufacturing, transport and delivery of the material.

Edge of Centre

For retail purposes, edge of centre relates to a location that is well connected and up to 300m of the Primary Shopping Area (where defined). This means that locations within a centre but outside

the Primary Shopping Area are considered to be edge of centre. For all other main town centre uses it relates to a location within 300m of a town centre boundary. For office development, this includes locations outside the town centre but within 500m of a public transport interchange, which includes railway and bus stations.

Electric vehicles

See ULEV infrastructure.

'Fracking'

See hydraulic fracturing.

Green Belt

Areas of land where development is particularly tightly controlled. The purposes of Green Belt are to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns from merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration by encouraging the recycling of derelict and other urban land.

Green Infrastructure

The network of protected sites, nature reserves, greenspaces and greenway linkages. The linkages include river corridors, waterways and flood plains, migration routes and features of the landscape which are important as wildlife corridors. Green infrastructure should provide for multi-functional uses i.e. wildlife, recreational and cultural experience, as well as delivering ecological services such as flood protection and microclimate control. It should also operate at all scales from urban centres through to open countryside.

Gross Internal Area (GIA)

Broadly speaking the whole enclosed area of a building within the external walls taking each floor into account and excluding the thickness of the external walls.

Gross Retail Floorspace

The total built floor area measured externally which is occupied exclusively by a retailer or retailers, excluding open areas used for the storage, display or sale of goods.

Heritage Asset

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing). [Source: NPPF]

Housing Development Boundary (HDB)

The boundary which defines that part of certain settlements within which the principle of residential development will usually be acceptable subject to compliance with policies in the Development Plan and other material considerations.

Housing and Economic Land Availability Assessment (HELAA)

An assessment of land availability identifies a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period. The assessment of land availability includes the Strategic

Housing Land Availability Assessment (SHLAA) requirement. The HELAA forms an important element of the evidence base supporting the preparation of the Local Plan.

Hydraulic fracturing or 'fracking'

This process involves opening and/or extending existing narrow fractures or creating new ones (typically hairline in width) by pumping a mixture of water, sand and additives at a very high pressure down a borehole to induce fractures in the shale rock bed allowing gas (or oil) to be captured.

Infilling

The filling of small gaps within existing development e.g. the building of one or two houses on a small vacant plot in an otherwise extensively built up frontage. The plot will generally be surrounded on at least three sides by developed sites or roads.

Local Needs Shops

Local Needs shops provide goods which need to be purchased on a regular and routine basis for which shoppers would not expect to travel further than their nearest centre. Examples of types of goods and services that would be expected to be available in a local needs shop can include beverages, bread, dairy produce, fish, fruit and vegetables, meat, newspapers, pharmaceuticals, post office services and toiletries. These shops may be operated by multiple or independent traders, and would include market stalls. Local needs shops will vary in size, depending on the characteristics of the local area including the nature of competing facilities. Local needs shops will often be larger in built-up areas in order to meet the day-to-day shopping needs of the local community. Local needs shops are essentially defined by their function as opposed to any rigid size threshold.

Main Town Centre Uses

Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Material consideration

A factor which will be taken into account in reaching a decision on a planning application. It must have relevance to the purpose of planning legislation which is to regulate the development and use of land in the public interest.

Morphology

The structure of urban form or its spatial configuration (Kropf, 2015)

National Planning Policy Framework (NPPF)

A framework which sets out the Government's planning policies for England and how these are expected to be implemented.

National Planning Policy Guidance (PPG)

Web based government guidance for England intended to assist

practitioners. Ultimately the interpretation of legislation is for the Courts but this guidance is an indication of the Secretary of State's views.

Net Internal Area (NIA)

Broadly speaking the usable area within a building measured to the face of the internal finish of perimeter or party walls ignoring skirting boards and taking each floor into account.

Out of centre

A location which is not in or on the edge of a centre but not necessarily outside the urban area.

Policies Map

Previously referred to as the Proposals Map and illustrates geographically the policies and proposals in the Development Plan Documents (DPD) on an Ordnance Survey map. Inset Maps show policies and proposals for specific parts of the district. It will need to be revised each time a new DPD is adopted.

Previously developed land

Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill where provision for restoration has been made through development management procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape. [Source: NPPF]

Primary shopping area

Defined area where retail development is concentrated (generally comprising the primary and those secondary frontages which are adjoining and closely related to the primary shopping frontage).

Primary and secondary frontages

Primary frontages are likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods.

Proposals Map

See Policies Map

Riparian

Relating to or situated on the banks of a river.

Regulated and unregulated emissions

Regulated emissions are those covered by Building Regulations Part L arising from the building fabric and services (e.g. insulation and boilers). Unregulated emissions are those that arise from householder plug-in appliances once the building is occupied

Safeguarded Land

A greenfield site not allocated for

development but excluded from the Green Belt to provide for development needs well beyond the Plan period.

Self-build and custom-build housing:

Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing. A legal definition, for the purpose of applying the Self-build and Custom Housebuilding Act 2015 (as amended), is contained in section 1(A1) and (A2) of that Act. [Source: NPPF]

Setting of a heritage asset

The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral. [Source: NPPF]

Settlement

Collective term for towns, villages and hamlets.

Shale Gas

Methane found in rocks deep below the earth's surface which had previously been considered too impermeable ('tight') to allow for economic recovery. The method of extraction involves hydraulic fracturing or 'fracking'.

Site Allocations

Allocation of sites for specific or mixed uses or development to be contained in Development Plan Documents. Policies will identify any specific requirements for individual proposals.

S/P ratio

Ratio of the luminous output of a light source evaluated according to the CIE scotopic spectral luminous efficiency function, V'(λ), to the luminous output evaluated according to the CIE photopic spectral luminous efficiency function, V(λ. (Source: BS 5489-1:2013)

Strategic Flood Risk Assessment (SFRA)

The SFRA is a high-level assessment of the flood risk and provides essential information for the allocation of land for development and the control of development in order to limit flood risk to people and property where possible and manage it elsewhere. It provides the information needed to apply the sequential risk-based approach required in Planning Policy Statement 25 'Development and Flood Risk'.

Strategic Housing Land Availability Assessment (SHLAA)

A study intended to assess overall potential for housing development in an area, including the identification of specific housing sites with development potential over a 15 year time span.

Strategic Housing Market Assessment (SHMA)

A study intended to review the existing housing market in an area, consider the nature of future need for market and affordable housing and to inform policy development.

Sui generis

In a class by itself or unique. Certain uses do not fall within any use class and are considered 'sui generis', such as betting offices/shops, theatres, houses in multiple occupation, scrap yards, petrol filling stations and retail warehouse clubs.

Sustainability Appraisal (SA)/ Strategic Environmental Assessment (SEA)

A systematic and iterative appraisal process, incorporating the requirements of the Strategic Environmental Assessment Directive. The purpose of sustainability appraisal is to appraise the social, environmental and economic effects of the strategies and policies in a local development document from the outset of the preparation process. This will ensure that decisions are made that accord with sustainable development.

Sustainable transport

Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra-low emission vehicles, car sharing and public transport. [Source: NPPF]

Town Centre

Area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres (as identified in the hierarchy in Policy CP12) but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres. [source: NPPF]

Trade Draw

The proportion of trade that a development is likely to receive from customers within and outside its catchment area. It is likely that trade draw will relate to a certain geographic area (i.e. the distance people are likely to travel) and for a particular market segment (e.g. convenience retail). The best way of assessing trade draw where new development is proposed is to look at existing proxies of that type of development in other areas.

Transport assessment

A comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies measures required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport and measures will be needed to deal with the anticipated transport impacts of the development. [Source: NPPF]

Transport statement

A simplified version of a transport assessment where it is agreed the transport issues arising out of development proposals are limited and a full transport assessment is not required. [source: NPPF]

Travel plan

A long-term management strategy for an organisation or site that seeks to deliver sustainable transport objectives. [Source: NPPF]

ULEV infrastructure

Active provision: parking spaces are fully wired and connected, ready to use from the outset

Passive provision: requires the necessary underlying infrastructure (e.g. capacity in the connection to the local electricity distribution network and electricity distribution board, as well as ducting for cabling to parking spaces) to enable simple installation and activation of a charge point at a future date.

Rapid charging is only available from dedicated charging equipment. A 50kW output DC rapid charger can typically provide an 80% charge in around 20-30 minutes. Regular rapid charging can affect the battery life, but it provides a convenient option to extend the range of an EV on longer journeys.

Fast charging is generally charging at a 7kW. At this power level it usually it takes 4 hours to fully charge an EV with a 24kWh traction battery.

Wind turbines (size)

Small: Hub up to approx. 21m, tip up to 25m
Medium: Hub up to approx. 61m, tip up to 95m
Large: Hub up to approx. 83m, tip up to 139m

Windfall sites

Sites not specifically identified in the development plan. [Source: NPPF]