

**Bath and North East Somerset Council**  
**Local Plan 2022 – 2042**

**Options Consultation**  
**February 2024**

**Topic Paper: Bath and Environs**

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# 1 Overview

- 1.1 This Topic Paper provides more detailed background information in support of the Bath section of the Local Plan Options document. It is intended to expand upon and provide the rationale for the approach taken in Bath, citing the existing and future evidence base relevant to the issues raised.
- 1.2 Whilst the topic paper does not form part of the Local Plan, it provides an important narrative that supports the policy position, and therefore needs to be read in conjunction with the policy options contained in the plan.
- 1.3 The Local Plan will set out a strategy and planning policy framework to help guide and shape future development and change over the next 15-20 years. It will enable greater climate and environmental resilience, as well as protect and enhance our high quality natural and built environment and key assets. The Local Plan identifies the need for new homes and jobs, and the services and infrastructure to support them, and guides where this development should happen and what form it will take. It does this by:
  - i) Setting out development management planning policies that will shape any development that requires planning permission. These cover a very broad range of themes including housing, employment, design, landscape, ecology, climate change etc.
  - ii) Allocating particular sites for development, through 'site allocations'. These provide specific development and design requirements outlining what the sites should be used for and how they should be developed.
  - iii) Designating land to protect what is special about Bath and North East Somerset, including its unique, high quality and renowned built and natural environment. Examples include Green Belt, landscape setting, conservation areas, local centres, open space or green infrastructure designations, ecological value etc.
- 1.4 The Local Plan is a key tool in managing change and in shaping the future of places. Whilst it does not deliver projects or instigate new initiatives, it does play a fundamental role in setting the context for how these might be formulated and progressed. It provides key policy 'hooks' for projects and initiatives that can deliver the objectives of the Local Plan. Importantly, the Local Plan is informed by a robust and proportionate evidence base.
- 1.5 The Options Document sets out the key issues, priorities and objectives and describes constraints such as the capacity of Bath to absorb its objectively assessed needs. The proposed approach is to evolve and update much of the existing and comprehensive strategic policy framework and the existing site allocations that were established for Bath in the currently adopted Local Plan. These have proven to be reasonably robust in managing change in the city and in the determination of planning applications.

- 1.6 It is also proposed to retain the majority of the existing site allocations, subject to reviewing and updating their content to accord with renewed priorities. Some of the existing site allocations, for example those that have been built out, are no longer required.
- 1.7 In addition, the Options Document considers the potential for more significant changes in policy direction and for specific site allocations, identifying where approaches need to be strengthened, or where more flexibility is justified based on the evidence available. It is an important part of the consultation process to test these approaches and to ensure that the approach taken in the Draft Local Plan is robust and can deliver the intended outcomes.
- 1.8 Additional new opportunities for development have also been considered. The most strategic of these areas has been to the west of Bath, and more detail on this location is provided in the Options document and below.
- 1.9 Other locations on the edges of the city have also been considered but at this stage have been discounted due to the anticipated level of harm that would be caused to issues of acknowledged importance, which is not considered to be outweighed by public benefit. Further information on this is provided in the Housing and Economic Land Availability Assessments (HELAA) and Sustainability Appraisals (SA) sections below.

## 2 Previous Consultation and Engagement Responses

- 2.1 To inform the production of the Local Plan Options document the Council consulted on the Launch Document and has undertaken a series of stakeholder engagement events with representatives of various organisations and with ward, town or parish councillors.

### Launch Document Oct – Nov 2022

- 2.2 The Council undertook public consultation on the Local Plan Launch Document from 4 October 2022 to 15 November 2022. The purpose of the Launch document was to set out the scope and purpose of the Local Plan, the key issues it will need to address and information on its preparation.
- 2.3 Overall, respondents were generally supportive of the Local Plan launch document and the priorities and objectives set out within it. Key themes identified in the feedback included:
- **Housing:** There was a general consensus among respondents that there is a need for more affordable housing in the area, particularly for young people and families. However, there were concerns raised around the impact of new developments on the local environment and infrastructure, and a number of respondents called for more sustainable and environmentally friendly approaches to housing development particularly in light of the Council's climate and ecological emergency declarations.
  - **Transport:** Respondents identified transport as a key issue, with a particular focus on improving public transport links and reducing congestion on the roads. There were also calls for more investment in cycling and walking infrastructure to encourage active travel.
  - **Environment:** Many respondents highlighted the importance of protecting and conserving the local environment, including green spaces, wildlife habitats, and heritage sites. There were calls for more action to tackle climate change and reduce carbon emissions, with a particular emphasis on promoting renewable energy and reducing reliance on fossil fuels.
  - **Economy:** Respondents were generally supportive of the council's objectives to support sustainable economic growth and create job opportunities in the area. However, there were calls for more investment in local infrastructure, such as broadband and transport links, to support business development.
  - **Infrastructure:** Many respondents raised concerns around the capacity of local infrastructure, particularly in relation to healthcare, education, and community facilities. There were calls for more investment in these areas to ensure that local communities have access to the services they need.

## Stakeholder Workshops: January 2023

- 2.4 To inform the preparation of the Local Plan Options document a series of stakeholder workshops took place throughout the district.
- 2.5 For Bath and Environs, the first workshop took place on 30<sup>th</sup> January at Bath Cricket Club and was attended by 33 people. The first part of this event explored what community representatives and key stakeholders valued about their places and their aspirations for the future of these places, whilst the second part explored responses to prompt questions under six themes.
- 2.6 The following highlights some of the emerging values, aims and priorities identified by stakeholders. See the whole report for detailed observations.

### **ZERO CARBON AND CLIMATE RESILIENCE**

- A strategic approach is needed to neighbourhood scale, building and energy retrofit. Where community energy could speed delivery of renewable energy sources.
- Adaptation to climate change should be integrated in design approaches – contributing to city wide flood mitigation and summer shade in streets.
- Decarbonising the city could be made visible through the greening of the city with a stronger connection to nature and through the transition of its movement systems to create a more walkable place with cleaner air.
- Wish to continue to see high energy and zero carbon standards for new builds.

### **MOVING AROUND**

- Streets need to be adapted and designed to prioritise walking and cycling with better storage/parking for cycles.
- The impact of traffic needs to be reduced over a wider area than the city centre.
- Neighbourhoods need more tangible connections between them and to the city centre – walking and night walking maps could develop this.
- Better, cheaper more responsive public transport is needed – with more incentives/rewards for changing behaviour.
- A mix and diversity of activities in neighbourhoods is valued and this can be contributed to by creating multi-functional neighbourhood hubs.
- There is a need to work more strategically enabling systems of movement for visitors, hospital and hospitality staff late at night, last mile deliveries and children travelling to school.

## **NATURAL SPACES AND BIODIVERSITY**

- There is an opportunity to link greener spaces in the city centre to green fingers reaching out into the countryside.
- Public spaces and parks are seen as important for bringing different communities and age groups together – and for providing for children and young people.
- Communities could be involved in the rewilding of underused Council owned spaces, increasing interaction with nature.
- More community gardens, fruit orchards and allotments should be created.
- Food growing, peri urban market gardens and urban agriculture should be encouraged.

## **IDENTITY AND BELONGING**

- There is ambition for ‘a city better than the one we have inherited’ and support for high quality design that is of its time, supported by clear guidance.
- There is an opportunity to push design standards for the integration of cycling, recycling and other facilities in new development and reduce the impact of parking decoupling this from the street.
- There is a role in the design of buildings and public spaces to shape safe places for women, with good natural surveillance and lighting.
- There are opportunities to provide more shared assets or resources alongside homes such as laundry rooms or garden sheds.

## **HOUSING AND SHARED PROSPERITY**

- Well located affordable and key worker housing, and more family housing are important.
- A proactive approach to providing homes for an ageing demographic is highlighted with more provision of Lifetime Homes that are attractive to downsize to and support independence for longer.
- More attractive and purposeful community spaces – are needed including co-working spaces.
- Need to consider climate resilience and access to affordable warm spaces and cool spaces in summer.
- Using land efficiently is necessary because space is limited. Concern about impact of too many Airbnbs.
- Economically consider different business models that foster sharing, caring and cooperating.

## HEALTHY & INCLUSIVE COMMUNITIES

- Synergies can be found in a diverse offering that is attractive to visitors and residents.
- To develop/support a vibrant cultural offer and activities that build on the city's reputation as a place of health and wellbeing.
- Need to consider access to healthcare and the need perhaps for walk in centres and clinics to take pressure off GPs and A&E.
- New and existing neighbourhood community hubs should be developed that are multi-functional, intergenerational and offer indoor and outdoor spaces.
- The aim should be that everyone can feel engaged and connected with their community.
- Here community ownership and management of places is also considered to be important.

Participants were asked to describe in three words what they value about their place. The 'wordcloud' below is a representation of what was said, with the size of the word reflecting how often certain words were mentioned:





## Seldom Heard Groups Engagement: Jan – March 2023

- 2.7 The Council consider it important to speak directly to groups of people who have, in the past, been underrepresented in planning-related engagement and consultation. The planning policy team worked together with colleagues in the public health and sustainability teams to identify groups most likely to be impacted by spatial planning and who are seldom heard in consultation and engagement. These groups comprised:
- Young People
  - People with physical disabilities
  - Black and minority ethnic groups
  - Older people, including those with dementia
  - People from a lower socio-economic background
  - Disadvantaged families with young children
- 2.8 Engagement workshops and conversations were held with a range of groups throughout January to March 2023, with officers attending locations and events that were already taking place, in order to allow for participation of individuals who would not have the time to attend structured workshops.
- 2.9 In relation to Bath the engagement involved the following groups: B&NES Youth Climate Conference, Bath Ethnic Minority Senior Citizens Association (BEMSCA), the Quebec Sheltered Housing Lunch Club, the Bath Romans Basketball Club, and Young Professionals in Bath. A report of these events is available [here](#), and summaries of the key recommendations from each of the sessions is as below:

# Youth Climate Conference

## Overarching themes

Significant changes in **policy, behaviour and education** required to tackle the climate crisis

Working towards **self-sufficiency** a key goal for most participants in relation to **energy and food**

Better, reliable, and cheaper **sustainable transport** required as soon as possible

## Key recommendations

1

Incentives required to persuade shops, businesses, and individuals to be more sustainable.

2

Key focus of Local Plan should be on renewable energy generation, particularly utilising solar.

3

Improvements required to all sustainable transport methods - cost, reliability, infrastructure provision.

4

All new houses should be carbon neutral or carbon positive, well-insulated, built from sustainable materials, and located where they will not be reliant on car use.

5

Key aim to 'see green' wherever you look, i.e. tree planting and small green spaces / areas of rewilding linking larger parks and natural green spaces.

## Bath Ethnic Minority Senior Citizens Association (BEMSCA)

### Overarching themes

Need for **lifecycle inclusive housing**

Value **green space** in Bath but feel it could be improved, especially play areas and benches

The emphasis of Bath as a Roman and Georgian city leads to glossing over the rest of its heritage

### Key recommendations

- 1** Edible landscapes and creation of allotments should be encouraged.
- 2** Community spaces and parks should all be made accessible and suitable for inter-generational use.
- 3** New homes should be designed for the full life course.
- 4** More social housing required, as well as good quality, accessible homes suitable for downsizing.
- 5** The economic impact of the clean air zone on low-income people should be properly considered, particularly in relation to current lack of suitable public transport to replace car journeys.

## The Quebec Sheltered Housing Lunch Club, Twerton

### Overarching themes

High saturation of **students** has damaged the **local identity and sense of community** in

People have become more **reliant on cars** due to **cuts to bus services**

**Housing is increasingly unaffordable** and isn't meeting local needs, particularly

### Key recommendations

- 1** The temporary warm spaces that have been created during the cost-of-living crisis should become permanent community centres.
- 2** Increase and improve access to and quality of public toilets.
- 3** Housing should be provided close to local centres with access to a shop, a post office and bank and new development should include a new local centre.
- 4** Housing should suit the whole life cycle, e.g. downstairs bathrooms and flat access
- 5** Existing social housing stock should be provided with solar panels and better insulation, not just new-build housing.

## The Bath Romans Basketball Club

### Overarching themes

**Make accessible  
the norm**

**Include those  
with disabilities in  
design and  
decision making**

**Design for  
independence  
and dignity**

### Key recommendations

- 1 All new builds to have level thresholds**
- 2 Official accessible stamp/charter, approved by wheelchair users**
- 3 No 'kissing gates' or inaccessible through-routes**
- 4 People with disabilities to be directly included in design**
- 5 Increased prevalence of accessible playgrounds**

## Young Professionals in Bath

### Overarching themes

Living and working in city centre is preferable, but expensive

Quality of walking routes is key to encouraging walking

Easy travel between Bristol and Bath is very important to attract people from Bristol to jobs in Bath.

### Key recommendations

- 1** Better promotion required for existing health and well-being related events and activities.
- 2** Locate new workspaces in areas close to local facilities and easily accessible by public transport.
- 3** Incentivise installation of renewable energy, double glazing and insulation.
- 4** Focus on making walking the preferred method of moving around the city.
- 5** To design inclusive places, the Council needs to diversify its engagement and involve a more diverse set of people in policy-making.

## Stakeholder Workshops: September 2023

- 2.10 A second workshop for community representatives and key stakeholders in Bath and its Environs was held at Bath Cricket Ground on September 11th. The workshop was attended by approximately 25 people. The first half of the workshop explored what community representatives and key stakeholders thought about the proposed Local Plan Responses to what had been said at the previous workshop. The second part explored the key questions, challenges and opportunities that should inform further evidence gathering or policy development.
- 2.11 The workshop was an opportunity to explore in more depth the ideas about priorities for the Local Plan. For stakeholders the role of the local plan in giving order and momentum to strategic adaptation and mitigation in response to the climate and ecological emergencies at a city and neighbourhood scale continued to be a priority. Stakeholders value the green and blue character of the city and want to see that evolve and improve alongside its distinct built and landscape heritage. The need to deliver accessible and walkable streets is thought to be important for visitors and residents alike. The need to make public transport work in the day to day to unlock more sites in the long-term was highlighted. Stakeholders thought there were opportunities to deliver housing that is more affordable and equitable by supporting more diverse delivery and by identifying both small scale, building and neighbourhood scale sites. A stronger development of approaches to mixing uses, localising facilities and recreation designations and supporting 15 minute neighbourhoods cut across the discussions. See the whole report for detailed observations.
- 2.12 In addition to these specific workshops, there has been a series of presentations and discussions with a wider range of other stakeholders, including the Bath Area Forum, the Bathavon Forum and the World Heritage Site Advisory Panel.
- 2.13 The outcomes of this stakeholder engagement have helped to inform the preparation of the Options document.

### **3 Evidence Base**

- 3.1 As outlined in the Local Plan Options document, a broad range of evidence has been commissioned specifically to support and inform the Local Plan and to provide the most up to date information. Examples of this include the Economic Strategy, the Future Economic Needs Assessment and Office and Industrial Market Review and the Local Housing Needs Assessment (LHNA), which are key pieces of evidence that have informed the whole of the Local Plan and as well as providing more detailed evidence for specific places such as Bath.
- 3.2 The Economic Strategy identifies that there is a clear need to provide more affordable housing if a fairer, more prosperous, and sustainable economy is to be achieved.
- 3.3 The Economic Needs Assessment and Office and Industrial Market Review is a key piece of evidence that helps to inform the direction and policy content of the Local Plan. For Bath, given the high demand for employment floorspace, it is resulting in a proposed strengthening of the policy framework that both protects existing sites for employment purposes and enables the development of new employment floorspace. This is an essential role of Local Plans: Once lower value land is lost to other higher value uses, it is unlikely to change back.
- 3.4 The LHNA has identified that the total need for affordable housing, comprised of social rent and low cost ownership, is very significant and represents 77% of total housing need in Bath. This reflects a well known fact that housing in Bath is expensive, but provides new evidence that clearly sets out the scale of the challenge.

### **Options on the edge of the city**

- 3.5 In assessing potential options for meeting development needs, the Council has considered all reasonable alternatives in and around the city. Consideration of options on the edge of the city were undertaken initially through the Housing and Employment Land Availability Assessment (HELAA) and then through the Sustainability Appraisal (SA) process.
- 3.6 The Housing and Economic Land Availability Assessment (HELAA) has taken a range of identified sites in the district (some 600 sites either submitted by landowners, developers, or other stakeholders, or identified by the Council where land in sustainable locations has not been submitted) and assessed their suitability, availability, and achievability.



3.7 The potential development capacity and trajectory of those sites identified as suitable, available, and achievable over the plan period have been considered further by the Council in identifying options for the Local Plan Options Document.

3.8 The Sustainability Appraisal (SA) then considered those sites identified as alternatives through the HELAA process. For Bath, the SA states:

Para 5.36: In terms of its potential to contribute strategically to future growth in the district, Bath is notably constrained by its World Heritage Site status and the surrounding Cotswold National Landscape. Landscape and heritage sensitivity studies are being developed, which will ultimately inform the significance of effects for growth options around Bath (and the potential for growth to align with the NPPF and international objectives), and the SA provides support by exploring wider impacts relating to other sustainability objectives.

3.9 The SA summarised its analysis with the following:

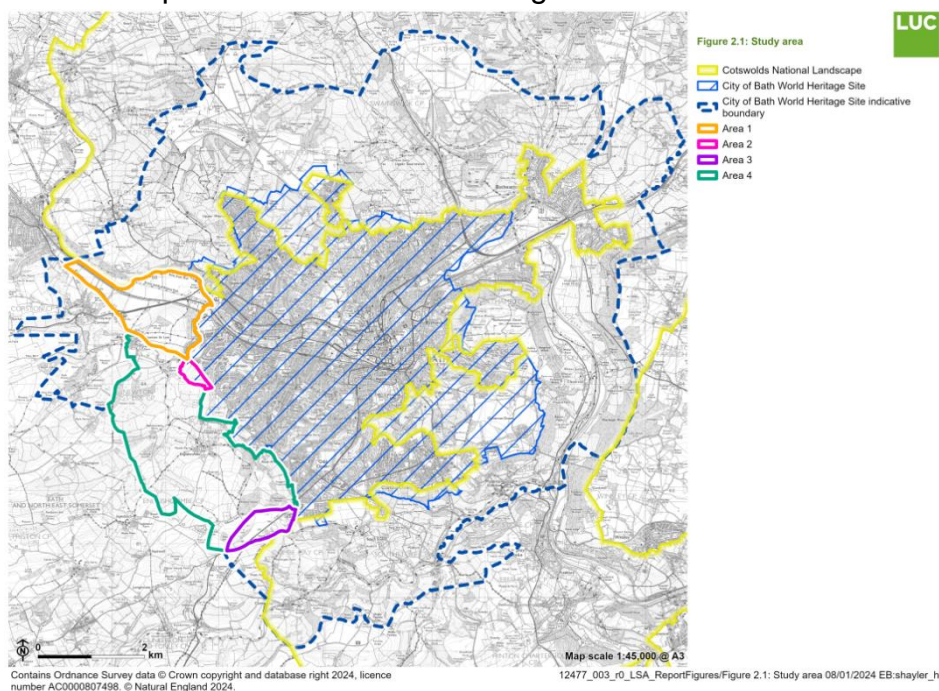
Para 5.89: With regards to Bath City and its environs, the evidence emerging around heritage and landscape impacts shows all options are likely to lead to what constitutes substantial harm, and thus would require the development of a case for 'wholly exceptional' circumstances. This would also lead to the additional risk of an unfavourable impact assessment from UNESCO and potential revocation of World Heritage Site status. At this stage, there is a weak case for wholly exceptional circumstances, recognising the growth opportunities that exist in the wider district, and the risk of strategic development impacting its World Heritage Site status is deemed too high. Bath City and its environs are therefore not considered a reasonable option for strategic growth, although an option for strategic growth west of the city is included in the Options Document for testing with stakeholders ...

3.10 The HELAA and SA have assessed sites and locations surrounding Bath and concluded that strategic development on the edge of the city would likely result in substantial harm to the WHS and the Cotswold National Landscape. At this stage in the Local Plan there are considered to be alternative locations away from, but well connected to Bath which means locations adjoining the city are not considered to be reasonable alternatives.

3.11 It is also important to acknowledge that Bath is surrounded by Green Belt. The National Planning Policy Framework (NPPF) makes it clear that exceptional circumstances must exist to justify changes to Green Belt boundaries. Paras 4.13 – 4.15 of the Local Plan Options document provides more information on the approach to Green Belt, provides a link to the West of England Green Belt Assessment and highlights that a more detailed assessment will be undertaken to support the Draft Local Plan

## West of Bath

- 3.12 One area on the edge of Bath that was considered to *potentially* have some scope for strategic level development is the area to the west of Bath. As the location lies close to the city and is relatively well connected through public transport, development here would result in benefits. In addition and unlike other locations surrounding the city, this area is outside of the Cotswold National Landscape area, although within its setting as well as within the setting of the WHS.
- 3.13 To properly understand the potential effects of development in this location and to inform the position of the Local Plan, the Council commissioned Land Use Consultants (LUC) to undertake a [landscape and historic environment assessment](#) of the potential effects of development. The setting of the World Heritage Site is significant and relates to the WHS attribute of 'the green setting of the city in the hollow in the hills'.
- 3.14 This assessment considered a number of potential development parcels and a range of development typologies across different parcels of land. The area assessed was broadly to the west of the city, see map below. This map shows land ranging from land straddling the A367 (including the Odd Down Park and Ride) through to the floodplain of the River Avon to west of the city.
- 3.15 The assessment by LUC demonstrated that any development in this area would be very likely to cause substantial harm to the WHS. The NPPF makes it clear that substantial harm to the WHS should be 'wholly exceptional'. This means, at this stage, it is unlikely that this location will be identified and allocated in the Draft Local Plan. However, it will be consulted upon to test and understand whether the substantial harm is necessary to achieve substantial public benefits that outweigh that harm.



## Design Issues

3.16 The approach to design is of critical importance in Bath. The adopted Local Plan contains a set of Design Values and a specific Bath Design Policy that were informed by a collaborative process of stakeholder engagement and supported by a broad range of evidence, including the following:

- WHS Attributes
- WHS Setting SPD
- Bath City-Wide Character Appraisal
- Building Heights Strategy
- Conservation Area Character Appraisals
- City of Bath Morphological Study
- Green Infrastructure Strategy
- Public Realm and Movement Strategy and Pattern Book

3.17 Further consideration needs to be given to how the current approach to design in Bath is to be taken forward, to provide the basis for more detailed design guidance and coding, and in updating existing evidence. The Council is keen to engage with stakeholders in this assessment process and to identify which aspects of design policy and guidance are of higher priority given limited resources. The outcome will inform the approach to be taken in the Draft Local Plan, due for completion towards the end of this year, and for any supporting documents.

## 4 Proposed Policy Approach

- 4.1 The proposed policy approach for the new Local Plan Options document covers a range of different aspects, as follows:
- 4.2 It sets out the key priorities of putting the economy and housing first, within the context of managing change within a World Heritage Site and ensuring that the Council address the climate and nature emergencies. This shapes how change should be managed in the city.
- 4.3 It proposes reviewing and refreshing the existing policy approach where it remains robust and relevant, whilst updating it to reflect current priorities and enabling high quality development to be delivered.
- 4.4 It proposes a deeper dive into areas of greater change, specifically the Newbridge Riverside and Weston Island areas. This will assess the potential that these areas have to intensify uses and will inform a policy framework that can effectively manage this change.
- 4.5 In the context of significant development needs associated with the city, particularly for both employment space and housing, it considers the potential for development to meet these needs on the edge of the city, particularly to the west of Bath.
- 4.6 It considers the potential for development further outside the setting of the WHS and test and explore the opportunities that this might present, see South of Burnett.

## Key Priorities for Bath

- 4.7 The Local Plan Options document is proposing to evolve the current strategic priorities of the adopted Local Plan in a number of important new ways. The precise wording of policies and supporting text will be informed by the outputs of the forthcoming consultation and through ongoing discussions that will take place during this coming year. These will be contained in the Draft Local Plan which is due for completion towards the end of 2024.
- 4.8 The key strategic themes that are to be carried forward and modified include:
  - i) Delivering the right homes in the right places and ensuring a greater diversity and choice of high quality, low carbon housing that is more affordable to meet the needs of residents and workers.
  - ii) Protecting and enabling the development of more employment floorspace, whilst supporting the transition to a fairer, more prosperous, innovative and sustainable economy within ecological and environmental limits.
  - iii) Addressing the climate and ecological emergencies.

- iv) Setting out a positive strategy for the conservation, enjoyment and understanding of the historic environment, and sustain and enhance the significance of the city's heritage assets including protecting the WHS and other valued assets such as the landscape setting of the city.
- v) Ensuring policy that supports the delivery of the Health and Wellbeing Strategy, and as a 'Well-Being City', ensure that Bath's built and natural environments facilitate better health and well being for all, with beautifully designed and well-connected streets and spaces that reinforces its aspiration to be Europe's most walkable city, with cycling and wheeling infrastructure for all users.
- vi) Placing a stronger emphasis on local, liveable neighbourhoods, improving opportunities for active travel and generating community energy.
- vii) Identifying that the network of local centres and neighbourhoods support day to day living and foster a strong sense of community engagement and involvement in local projects.
- viii) Recognising that parts of some wards in Bath experience inequalities in health and wellbeing outcomes and that the built and natural environment can play an important role in addressing inequalities.
- ix) Acknowledging that there are existing residents within and outside of Bath who feel disconnected with or do not utilise all that Bath has to offer. The role of the built and natural environment in promoting places that are inclusive to people of all ages and abilities, as well as being health promoting more generally, will be important.
- x) Placing a stronger emphasis in the Options document on the Bathscape Vision and promoting Bath as the 'Landscape City', requiring a transformational approach to deliver nature recovery and climate resilience. Raising the importance of landscape and the natural environment on the quality of the place for both people and nature. And highlighting the essential role of nature recovery to address the ecological emergency and nature based solutions to address issues such as surface water flooding.
- xi) Setting out the need for an ecosystem framework for Bath that will inform the design of development and its integration with ecosystem functions, networks and nature based services.
- xii) Providing more explicit policy that supports the delivery of the GI Strategy and other projects and initiatives that help deliver the framework. This will require a prioritising of a revised GI policy, and investment in green infrastructure on a par with grey infrastructure.

- xiii) Support the diversification and long term sustainability of the University of Bath and Bath Spa University in their transition towards the provision of enterprise and innovation space, and the Locksbrook Creative Quarter.
- xiv) Helping to deliver Bath's Journey to Net Zero Transport Plan (JTNZ) which was adopted in 2022. The JTNZ sets out a plan to tackle some of the biggest challenges our society faces: combating climate change, improving air quality, improving health and wellbeing and tackling congestion. The plan identifies the changes needed to our transport system to create places we want to live and work; with better connected, healthier and genuinely sustainable communities, and alongside the new transport strategies, helps to underpin and support the Local Plan.

## Site Allocations

- 4.9 The site allocations demonstrate how the Council is seeking to address its objectively assessed needs, which are expressed in both qualitative and quantitative terms. The evidence sets out the floorspace requirements of different types of uses, such as offices or industrial, and identifies the types of locations in which they are needed.
- 4.10 In preparing the detail of the site allocations, the Council will undertake a thorough assessment of the overall quantum of different types of uses that the city needs, for example how many homes are needed and of what type, and how much employment space is required and where. It then needs to assess the amount of land available and the capacity of sites to absorb this quantum of development. In addition to this, the site allocations need to have a reasonable prospect of being delivered over the plan period, and as such will be subject to a high level viability assessment to ascertain whether there is a reasonable prospect of development being achieved. The viability assessment is likely to test site typologies and/or specific site allocations to see if policy requirements of the Local Plan can be viably delivered.
- 4.11 As set out in the Options document, the capacity of the city to absorb all of its objectively assessed needs is increasingly limited and the Council has had to prioritise certain uses over others. The detailed work on the site allocations will inform the Draft Local Plan and will demonstrate whether there is sufficient capacity within the city to meet the priority needs and whether there is any additional capacity for other objectively assessed needs that have been identified by the evidence base. These other objectively assessed needs could include Purpose Built Student Accommodation (PBSA) and other land uses.
- 4.12 In addition to reviewing the existing policy position and evidence base, new evidence also needs to be undertaken to inform the Draft Plan. This includes the following area:

## **Newbridge Riverside Reimagined**

- 4.13 This will assess of the potential role of this key employment location and explore the scope for intensifying development capacity, optimising the use of land, integrating ecological networks and sustainable transport routes. It will include Weston Island, currently occupied by First Bus.
- 4.14 The outcomes of this assessment will inform the Draft Local Plan.

## **West of Bath**

- 4.15 Land to the West of Bath has been considered as a potential option for strategic development close to the city. More information is set out in the 'Options on the edge of city' section above (paragraphs 3.12 to 3.15).

## **Other strategic development locations**

- 4.16 Following on from the conclusions of the HELAA and SA, as set out above in the 'Evidence' section, the potential opportunities for strategic or non-strategic development on the edges of city will need to be considered in the context of further technical evidence and sensitivity testing in relation to the historic environment, which will be available to inform the next stage of the Local Plan and SA.

## **South of Burnett**

- 4.17 This location has been identified as a potential long-term opportunity for a standalone development or new community that could help to address objectively assessed needs either towards the end of the Local Plan period or beyond the plan period as part of a longer-term spatial strategy. The council is seeking views on whether stakeholders consider it should be explored.

4.18 It is included in the Options document to assess the potential issues that would need to be considered and whether this area has any merit for further discussion and exploration. The map below indicates a broad area of search. The area is identified as it lies relatively close to Bath and causes less landscape harm to other locations close to the city, although woodland planting would be required in the area to the west as screening to the Chew Valley. It is set out in chapter 5 of the Options document.

