

# Local Plan Options Document 2025

## Chapter 5 - Bath

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### Formatting Note:

The text within this document is based on the 2024 Options Document. New text and sections are added shaded in blue

## 5. Bath

### Why are we consulting again on the Local Plan options?

- 5.1 The council previously consulted on its Local Plan Options Document in the spring of 2024, and one of the key roles of the local plan is to demonstrate how it can meet the objectively assessed needs of future development. An important component of this is the amount of housing and employment space that the council needs to plan for. In late 2024, the government published some important changes to national policy and set out revised, mandatory housing targets for each local authority. The new housing target (known as the standard method figure of housing need) is more than double the previous figure and has increased from a little over 700 homes per year to around 1,500. In total, this changes from 14,000 over the plan period to around 27,000 new homes. The associated jobs growth in order to retain an overall balance between homes and workers within B&NES increases to around 25,000.
- 5.2 As a result of these national policy changes and the increased housing target, the council decided to reset the local plan so that it could undertake further evidence work and assess further options for providing increased levels of development. This Local Plan Options Document primarily sets out options for providing the additional development now required, and the opportunities for Bath to contribute towards the new housing target will be reassessed.
- 5.3 We previously presented options for development to meet a lower level of identified need in the Local Plan Options consultation that was undertaken in spring 2024. The comments received in response to that consultation are still entirely valid but given that we have had to reset the local plan to meet a significant increase in our housing targets, we have not responded to the comments raised at that stage.

5.4 The comments received during this Local Plan options consultation, as well as the comments on the spring 2024 options plus ongoing engagement with communities and other stakeholders, will need to be considered as a whole, and will be used to help shape the Draft Local Plan. It is the Draft Local Plan that sets out the council's proposed site allocations and policies to shape and guide change and development that requires planning permission.

## **Strategy Overview**

5.5 The local plan is an important statutory document that sets out the key issues, the council's emerging vision and priorities, and the spatial strategy for how this should be delivered. There are a number of complex and critical issues and challenges facing Bath, and a range of priorities that have emerged in discussions throughout the council and through a period of stakeholder engagement.

5.6 It is a key role of the local plan to allocate new sites and protect existing sites for particular types of development and this is informed by robust evidence. The local plan will also set out the specific requirements that each site needs to fulfil. This is complementary to content elsewhere in the local plan, particularly the Development Management sections that cover specific subject areas.

## **Options Consultation 2024**

5.7 Comments on the previous options consultation in Spring 2024 are still relevant. These comments will be reviewed and taken into account, together with additional comments received, when the draft plan is being prepared. Below is a short summary of some of the main issues raised in the previous consultation.

## **Bath overview**

**Transport and Connectivity Improvements:** Critique of current public transport with suggestions for better cycling infrastructure, pedestrianisation, and improved connections to reduce car reliance.

**Brownfield vs Green Belt Development:** Focus on brownfield site development while considering the potential release of green belt land, highlighting growth and conservation/World Heritage Site (WHS) concerns.

**Housing Affordability and Diversity:** Call for more affordable housing and various solutions amidst issues of resident displacement due to investment properties.

**Support for Local Amenities and Infrastructure:** Suggestions for ensuring new developments include necessary infrastructure like healthcare, schools, and community amenities.

**Sustainable and Green Development:** Emphasis on ecofriendly housing solutions, green space protection and development plans that incorporate climate resilience.

**Historic Preservation vs Development Needs:** Discussion about balancing the preservation of Bath's heritage with the modern development demands.

**Community Engagement and Social Equity:** Desire for increased community involvement in planning and policies addressing social disparities, such as differential council tax.

**Tourism Management and Economic Diversification:** Recognition of tourism's impact with suggestions for better management and the need to broaden Bath's economic base beyond tourism and education.

## Bath: Site options overview

- **Environmental Conservation vs. Development Needs:** Respondents express a need to balance housing development with conservation of Bath's natural and historical environment, prioritising brownfield over greenfield locations to secure local biodiversity and heritage.
- **Sustainable Urban Planning & Transport Solutions:** Discussions centre on the importance of site selection near to the city to reduce car reliance, integrating sustainable transport, managing congestion, and considering park and ride facilities to mitigate traffic impacts.
- **Heritage, Culture, and Community Wellbeing:** There's a noted tension between growth and preservation of Bath's heritage, proposing developments respect cultural values and repurpose spaces within these constraints without compromising the city's historic character.
- **Housing Crisis and Affordable Accommodation:** The acute need for housing, particularly affordable and student accommodation, is highlighted. Calls for higher density redevelopment of under-used sites and adherence to affordable housing provisions are mentioned.
- **Community Engagement and Policy Revision:** Respondents encourage more community involvement in planning, revising existing site allocations to reflect updated priorities like climate adaptation and ecological preservation.
- **Infrastructure and Public Services Impact:** Concerns focus on the potential strain of new developments on existing infrastructure and public services, advocating for corresponding infrastructural enhancements.
- **Climate Change and Ecological Response:** Some emphasis on aligning housing developments with climate and ecological emergencies, focusing on energy-efficiency, green infrastructure, and sustainable water management practices.

## West of England Growth Strategy

5.8 In addition to the council's Economic Strategy the West of England Mayoral Combined Authority (WECA) is also preparing a Growth Strategy which is responding to the government's ambition to secure sustained growth and increased productivity in all areas of the country. WECA is working in partnership with the four local authorities, including B&NES Council. The Local Growth Strategy will outline how WECA will help to drive growth in the region, building on the area's unique strengths and opportunities to support key growth-driving sectors. It focuses on four geographical areas, with two zones within B&NES that reflect the areas of focus in our Economic Strategy i.e. the Somer Valley Growth Zone and the Bristol and Bath Growth Zone. The emerging Local Growth Strategy will also set an important part of the context for our local plan and we will need to align our planning policy framework and site opportunities to help deliver sustainable economic growth.

### Bristol and Bath Growth Zone

5.9 The Bristol and Bath Growth Zone will develop the strength of partnership working between the council, universities and WECA. This will also enable the benefits of both regeneration and economic growth to be realised. This zone offers a different model of support, will balance economic requirements with meeting housing needs along the Bristol to Bath Corridor, and will deliver the planned infrastructure improvements that are needed.

5.10 Within this zone the priority objectives will focus on:

- Bath Riverside Innovation Quarter/Bath Quays North, developments in North Keynsham and joint work on masterplanning key developments – including the Fashion Museum Bath and Future Fashion Works.
- Exploring the potential to partner with WECA to deliver key employment and housing sites.
- Transport projects especially mass transit and Saltford rail station.

## Place Profile

5.11 Bath is an incredible city, with an international reputation – beautiful, creative, green, compact, well connected – it offers fantastic quality of life. The city has a population of around 94,000 people and a larger catchment population who travel into the city for work and leisure. Despite its strengths the city has become increasingly unaffordable, and increasingly unequal – with house prices now 16 times average earnings and both life expectancy and educational outcomes starkly different for those in our most deprived areas. Our population is aging; and both our university graduates and resident young people are unable to settle here – creating a shrinking resident workforce.

5.12 Economic growth in the last ten years has been sluggish and our lower-than-average wages cannot keep up with escalating costs of local housing. The council's Economic Strategy signals a new approach to local economic development which prioritises meeting the needs of all our residents and places whilst reducing impacts on our natural resources and environment.

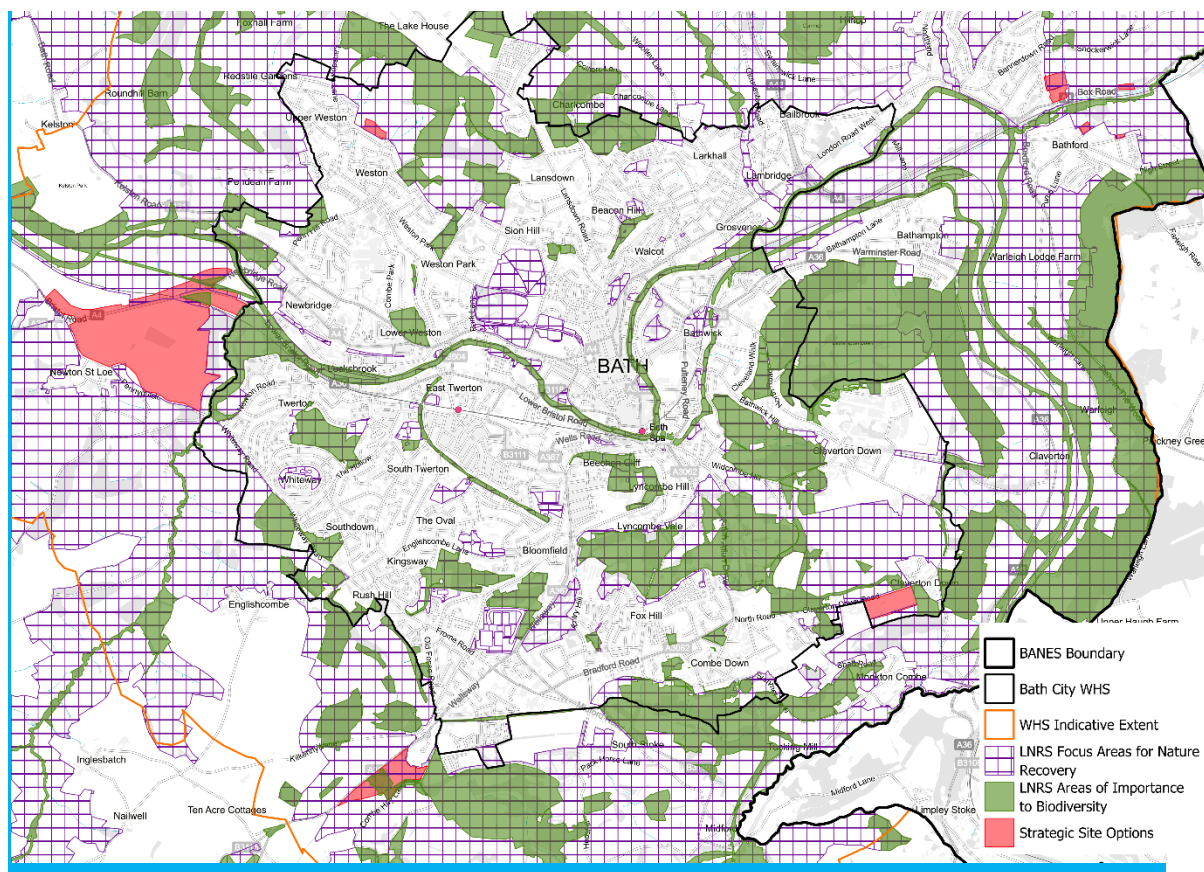
5.13 The city has a vibrant cultural offer which supports its important role as a domestic and international visitor destination that attracts over 6 million visitors annually. It is a successful regional shopping destination, with below average vacancies.

5.14 Bath is a rare double inscribed World Heritage Site, one of 22 of the currently inscribed 1,248 World Heritage Sites globally. This means that Bath is internationally significant and of Outstanding Universal Value (OUV) to the whole of humanity. It is within this context that the local plan manages how the city needs to evolve whilst avoiding harm to OUV. Some examples would be protecting sensitive landscapes such as the green setting, including the indicative setting, from inappropriate development or by controlling the height of new buildings.

5.15 The West of England Local Nature Recovery Strategy and Toolkit (LNRS) was published in November 2024. The LNRS identifies the following areas:

- Areas that are already of importance to biodiversity. These are sites that are nationally designated for their value to nature, such as Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). It also includes sites that are designated as Local Nature Reserves; sites that are locally designated as Sites of Nature Conservation Interest (SNCIs), and/or are irreplaceable habitat including ancient woodland.
- Focus Areas for Nature Recovery. This is where action to recover nature will have the biggest impact and is most feasible. These have been mapped to reflect the priorities for nature recovery, and include all of the mapped measures for nature recovery. The focus areas for nature recovery are referred to as 'areas that could become of particular importance' in regulation.

5.16 Map 9 below shows where these areas are located in Bath, and the relationship between these areas and the Site Options under consideration in this Options consultation. Constraints and opportunities are referenced for each Site Option where appropriate.



*Map 10 showing Local Nature Recovery Strategy sites in and around Bath.*

5.17 There is a comprehensive network of liveable neighbourhoods that support the local needs of the resident population and provide day to day facilities within close proximity to where people live.

5.18 Bath has two universities that together represent approximately 25% of the residential population. The University of Bath is the second biggest employer in the city. Whilst the universities bring many benefits that include a thriving student population that support a vibrant city, the expansion of both the universities creates tensions in other areas of city life. Significant pressures include the effect of this expansion on the existing housing stock and on development sites that need to be prioritised for housing that is affordable, and for meeting the employment needs through new office and industrial development.

- 5.19 Traffic congestion in the city is a major challenge that has affected air quality resulting in an Air Quality Management Area. There is significant in- and out-commuting. Bath benefits from a mainline railway station with a half hourly service to London and frequent connections to Bristol, Keynsham and towns in Wiltshire. Bristol international airport is proximate to the city providing a national and international gateway to the city and region. It is a very walkable city and the city benefits from a number of strategic cycle routes: the Bristol to Bath Railway Path, the Kennet and Avon Canal and the Two Tunnels Greenway.
- 5.20 In formulating the spatial strategy for the city, a sound starting point is to review the existing spatial strategy for Bath and to identify where there are policy gaps, where it needs to be re-written and other areas where it's robust but might need evolving.
- 5.21 As with other places across the district there is a broad range of evidence that informs policy choices including: Climate Emergency Strategy & Ecological Emergency Action Plan, Local Housing Needs Assessment (LHNA), Economic Needs Assessment, Journey to Net Zero Transport Strategy, Health & Wellbeing Strategy, Economic Strategy and Cultural Strategy. Some other strategies are in the process of being commissioned including the Sustainable Tourism and Visitor Accommodation Strategy.

## Key Issues

5.22 Bath is of global importance, recognised by its double inscription as a World Heritage Site. This is an international designation which transcends national boundaries. In addition, the city has over 5,000 listed buildings, and an extensive conservation area that covers two-thirds of the city. It is surrounded by the Cotswold National Landscape around three sides, which is characterised here by a highly complex and often very steeply sloping landform, and also the Green Belt. Whilst these are positive aspects of the city's character, a consequence of this is that there are limited opportunities for outward expansion and there is not enough land available to meet all of the city's objectively assessed needs and so priorities need to be made. One of the key roles of the local plan is to prioritise and set out the spatial distribution of different uses within the city.

5.23 House prices in the city are very expensive and many people who work in the city have to or choose to live elsewhere to meet their housing needs. The Local Housing Needs Assessment (LHNA) identifies 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. The Housing Mission Delivery Board has been established in B&NES to unite organisations from across the housing sector, including anchor institutions, to deliver more affordable housing that addresses needs. It is also important to recognise that whilst short-term lets limit housing for residents, they are an important aspect of the visitor economy

5.24 The Economic Strategy sets out ambitious proposals to address Bath's specific economic challenges and create a fairer, more prosperous and sustainable economy focussing on innovation and creativity. Our strong visitor economy outcompetes health and care sectors - with both sectors increasingly dependent on inward commuting, placing pressure on transport networks and resulting in congestion. There is an identified need for more high quality office space in central locations, and industrial/hybrid business floorspace at a broad range of scales for established, growing and emerging sectors, to meet the city's economic ambitions. As referenced above, central Bristol to Bath has been established as a Growth Zone in the WECA Local Growth Strategy creating new opportunities to diversify our economy, unlocking prime commercial development sites in the city centre benefiting from excellent access to Bath Spa train station.

5.25 The universities jointly represent approximately 25% of the city's residential population. The University of Bath is the second biggest employer in the city. Whilst the universities bring many benefits that include a thriving student population that support a vibrant city, the expansion of both the universities creates tensions in other areas of city life. Significant pressures include the effect of this expansion on the existing housing stock and on development sites that need to be prioritised for housing that is affordable, and for meeting the employment needs through new office, industrial and hybrid business space development.

5.26 The city suffers from significant traffic congestion. 75% of people driving to work in Bath do so from outside of the city resulting in heavy congestion on those key corridors into Bath such as Bathwick Street, London Road, Lower Bristol Road, and the Wellsway. In 2002 an Air Quality Management Area was declared and to improve air quality a Clean Air Zone was introduced in 2021 due to continued exceedances of the legal limits of Nitrogen Dioxide.

5.27 The effects of climate change are expected to bring increased flood risk, surface water run-off and land slip. These need to be planned for and managed, where possible using nature-based solutions.

- 5.28 The role of green space and nature recovery in supporting, invigorating and enhancing the city is critical to address the ecological emergency and providing access for people.
- 5.29 Parts of some wards in Bath experience inequalities in health and wellbeing outcomes, including Twerton, Whiteway and Foxhill, and the built and natural environment can play an important role in addressing inequalities
- 5.30 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, abilities and educational attainment, as well as being health promoting more generally, will be important.

## Emerging Vision and Priorities

5.31 The council is working on an emerging vision and set of priorities for Bath. These priorities reflect and seek to address the issues identified above which have been informed by engagement with community representative groups. The priorities outlined below are broader than those that can be addressed through the local plan.

5.32 Many of the priorities listed can be addressed by new development, and site or policy approach options have been selected to respond to the priorities. However, there are some priorities that won't be addressed through new development but will be addressed through other policies in the local plan, or by strategies or initiatives undertaken by the council or by other stakeholders.

- Ensure that Bath remains a vibrant, attractive and sustainable city – to tackle our affordability crisis; diversify our economy whilst maintaining the success of our visitor economy, and ensure that all residents are able to benefit from its opportunities; and help build a greener, more resilient city for the future.
- Provide the space to help diversify and grow our economy within ecological and environmental limits. This will need to reflect our wide variety of needs from city centre offices and workspaces to larger industrial premises, advanced engineering, R&D and lab spaces.
- More joined up skills and employability support, as well as investment in physical connectivity, will help residents in our less affluent wards to access new employment opportunities in our innovation district, cultural and creative industries and foundational economy.
- Bath is also a city of invention, and reinvention. Rising to the challenge of the climate and nature emergencies, we will continue to be leaders on sustainable living, showing how we can adapt our sensitive heritage assets to be both energy efficient and more resilient to our changing climate.

- Deliver the right homes in the right places ensuring a greater diversity and choice of high quality, low carbon housing that is more affordable to meet the needs of residents. As is the case across the district it is important that we build new homes and to enable greater levels of building retrofit so that they are efficient to heat and that use clean energy, and which are fit for the whole life-course (young people, families, and into older age).
- Enable more young people to stay in Bath, who want to, with access to a wider range of employment and entry level housing options.
- Set 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:
  - The OUV of the doubly inscribed World Heritage Site and its landscape setting, its listed buildings, the Bath Conservation Area and its setting, archaeology, scheduled ancient monuments and historic parks and gardens, and non-designated assets of local interest and value.
  - The double World Heritage Site Inscription of Bath will be embraced and opportunities taken to build on the inspirational qualities of the OUV. We will seek to develop a global reputation for the highest quality, innovative design of a sustainable city which celebrates its unique heritage and landscape setting whilst rising to the challenges of the future.
  - Enhance the role of the city as a place of vibrant, diverse and world class culture, building on its global reputation as a place of leisure and resort and as a wonderful place to live, to work and to visit. Ensure it is welcoming, safe, engaging, inclusive and enriching for all ages and abilities. Investment in our cultural assets and visitor economy will bring benefits for residents, both through economic returns and a richer cultural offer.

- Support the Bathscape vision with policies and supporting guidance to protect, promote and deliver the ambitions for a 'Landscape City'. This requires a transformational approach which will deliver nature recovery and climate resilience. By increasing the extent of land and waterways managed positively for nature and by protecting natural assets through investment in nature based solutions and wildlife friendly interventions that improve ecological network connectivity, the city will address the need to increase the abundance and distribution of biodiversity.
- The delivery of strategic Green Infrastructure and nature recovery projects such as Bath River Line and Bathscape will sustain our position as the original wellbeing city, delivering improved access to green and blue spaces and placing nature at the heart of any development opportunities.
- Ensure policy that supports the delivery of the Health and Wellbeing Strategy, and as a 'Wellbeing City', ensure that Bath's built and natural environments facilitate better health and wellbeing 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. It will provide a diverse range of high quality leisure, cultural, play and community spaces for all ages, cleaner air, and improved access to green spaces and the surrounding landscape.
- 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.
- Provide for a network of local centres and neighbourhoods that support day to day living and foster a strong sense of community engagement and involvement in local projects, and ensure the provision of community infrastructure.

- Make it easier to travel sustainably within Bath as well as from neighbouring cities, towns and villages, by walking, wheeling, cycling and by public transport, as well as improving air quality in the city. Bath's Journey to Net Zero Transport Plan (JTNZ) was adopted in 2022. The Bath Movement Strategy and Active Travel Strategy propose to enable the delivery of integrated transport solutions and promote sustainable mobility throughout the city. Both strategies are aligned with the objectives and funding provided by the current City Region Sustainable Transport Settlement - government funding to improve the West of England's sustainable transport system. Together, these initiatives are intended to encourage modal shift, and improve air quality, building on Bath's established walking, wheeling and cycling network.

## The Capacity of the City

- 5.33 For very good reasons, Bath is a constrained city. Its ability to expand outwards into the setting of the World Heritage Sites without causing substantial harm is very limited and building heights of new development in the city need to ensure that its character and important views are maintained and enhanced. A consequence of this is that the council needs to carefully manage the land that is available and needs to prioritise those land uses that will deliver a city that better addresses the climate and ecological emergencies, is more sustainable in how people travel, more economically prosperous and meets our need for more housing that is affordable.
- 5.34 One of the key roles of the local plan is to seek to sustainably meet objectively assessed needs for housing, particularly affordable housing; economic space and other uses.
- 5.35 Given that Bath's lack of land was previously recognised in the formulation of the Core Strategy and the Placemaking Plan, a decision was taken then to prioritise housing and employment over other needs. The evidence available at the time informed the policy approach and sufficient land was safeguarded to demonstrably meet these priority needs. That meant that a more flexible approach could be taken for other land, notably in the Twerton Riverside area, to accommodate some of the other land use needs such as for Purpose Built Student Accommodation (PBSA).
- 5.36 Most of the PBSA that has been built since the adoption of the Core Strategy and Placemaking Plan has generally not been on land protected for the priority land uses, but on land where there was a more flexible policy approach to land uses i.e. Twerton Riverside, as well as on 'windfall' (or non-designated) sites such as the Bath Cricket Club.
- 5.37 Given the significant scale of development that has been delivered over the past ten years or so, the amount of land left in the city is even more limited than previously. The council has made it very clear that our key priorities are to optimise the delivery of housing that is affordable, and to safeguard existing and

provide new employment space. These uses will therefore be the key priorities for the local plan. local plan.

5.38 Key pieces of evidence that support the council's position are the Local Housing Needs Assessment (LHNA) which identifies what our specific housing needs are for the duration of the plan period, and the Future Economic Needs Assessment Update (May, 2025) which has assessed the performance of different economic sectors and has projected future areas of growth. This latter report is clear that the city needs to protect existing space and deliver a total of 74,000 – 79,000 sqm new office and research and development space (including existing commitments). It also needs to both protect existing and enable the development of between 38,000 - 44,000 sqm of new industrial (including replacement) floorspace, including for advanced engineering purposes, clean tech, health and life sciences, warehousing and logistics. Some of the requirement for additional space will be met on sites that are already committed for employment development (sites with planning permission or allocated in the adopted Local Plan). These existing commitments will need to be reviewed in preparing the Draft Local Plan.

5.39 Given these land use priorities and their spatial needs, we then need to understand what capacity the city has to adsorb these needs: How much land do we have and how do we optimise its use, whilst also ensuring that we enable the coherent delivery of exemplary developments that work together to reinforce the city's important character and identity of the city? This spatial analysis is ongoing and will inform the Draft Local Plan.

5.40 A consequence of this approach is that there is highly likely to be less land available for other uses for which evidence might suggest that there is a need. A clear example of this is Purpose Built Student Accommodation (PBSA). As outlined above, a key role of the local plan is to mediate between different land uses and in doing so, particular land uses will not be permitted in specific locations (see also PBSA policy options in chapter 9: Development Management policies).

5.41 Based on population projections the LHNA suggests a growth in the student population aged 18-23 of around 7,300. This would equate to around 370 student bedspaces per year. As outlined above, challenges exist in accommodating continued levels of student growth within Bath, and across the district, particularly given the priority for accommodating non-student housing and especially affordable housing to meet local need and employment space. Additionally other local plan priorities e.g. relating to green infrastructure provision and protection of the World Heritage Sites, its setting, and other heritage assets also limit the ability to accommodate further PBSA. The council would be supportive in encouraging the universities to invest in appropriate PBSA opportunities outside of the city and recognises that in order to achieve this better transport connections, more green/blue spaces, a better night-time economy and more cultural opportunities elsewhere are required.

5.42 Although it is appropriate to understand the overall student housing need arising from the projected growth of student population based on long term trends, it is also important to ensure alignment with the future growth aspirations of the University of Bath and Bath Spa University. Both universities are updating their future growth strategies, which will impact on student numbers, and required accommodation. The council continues to work with both universities to understand their projected growth plans and therefore, to ascertain more likely future growth in the number of students. This should then form the basis for considering options for providing additional student accommodation. As the universities are historically only able to provide forecasts for the next 5-10 years this element of future requirements and associated strategy will need to be kept under review.

## **Spatial Strategy for Bath**

5.43 The spatial strategy for Bath recognises the different approaches that are required in different parts of the city, from the vibrancy of the city centre, to local neighbourhoods where many day-to-day needs are met, to our treasured and varied green and blue spaces that support health and wellbeing, and which are crucial for climate resilience, mitigation and nature recovery.

5.44 The strategy prioritises the delivery of general housing (especially affordable) and employment uses that help the transition from a low wage to a more productive economy. This priority is essential in a constrained city with a limited supply of land, and with healthy competition for the use of available sites.

### **City Centre**

5.45 The local plan seeks to enable the key characteristics and diverse roles of the city centre to be enhanced, ensuring that it continues to perform as the cultural heart of the city, and the main destination for retail, entertainment, leisure, events and activities. The public realm plays a critical role as the canvas for public life, which needs to be enhanced and properly maintained for the benefit of all users.

5.46 There is a current city centre policy boundary which serves as an important planning tool that helps to prioritise the location of town centre uses. It is supported by a planning policy framework to ensure that the centre remains vibrant. A review of this boundary will be considered as part of the preparation of the Draft Plan.

5.47 The potential of existing unoccupied spaces above retail units and in other central locations needs to be brought forward as bringing people to the heart of city would have significant benefits and would help to meet housing and employment needs.

5.48 The priorities for the city centre are:

- **A visitor economy that works for the city** – capitalising on significant cultural investment in the city through emerging projects such as the Fashion Museum and the Assembly Rooms alongside existing investment in Bath Abbey, the Holburne and the Victoria Art Gallery to drive visitation whilst also exploring further how to make Bath one of the most sustainable tourism destinations in the world.
- **Affordable workspace** – repurposing of upper floors and proactive meanwhile use strategy to unlock space for a range of businesses.
- **More car-free, affordable housing options in the city centre** – including large sites, small windfall sites, and utilising vacant space on upper floors.
- **A pedestrian-oriented city centre** - supported by Bath's Movement Strategy
- **A comprehensive programme of transforming the public realm, making it more climate resilient, whilst providing a world class canvas for public life.**

## **Bath Riverside Innovation Quarter (BRIQ)**

5.49 This area comprises a range of key development sites that are crucial to enable the city to deliver a more vibrant and successful economy. Through a partnership with the University of Bath, building on existing strengths around creative problem solving, engineering design and tech transfer, this area will evolve as a testbed of innovation and new ideas, a place for collaboration and discovery. New businesses will be born here, be nurtured and allowed to thrive and grow, and be supported by an ecosystem of research and development associated with the university sectors, and by more established businesses, small and large.

5.50 These sites will benefit from their close proximity to Bristol and from the frequent rail connections to London and beyond, and our international reputation gives Bath global recognition for inward investment. The sites are readily accessible by sustainable means to the large residential workforce who live in a choice of locations such as Bath, Bristol, and nearby towns and villages.

## **Bath Production Quarter**

5.51 This is a key industrial location comprising of the Locksbrook Road and Brassmill Lane areas and lying adjacent to the river in the west of the city. There is significant potential to intensify economic activity in this area and for it to play an important role in the provision of high quality jobs in a vibrant part of the city. Some of the city's larger businesses such as Rotork and Horstman operate from this area, as do an eclectic mix of smaller enterprises as well as Bath Spa University's exemplary Locksbrook Campus.

## Neighbourhoods and Local Centres

5.52 Bath's networks of neighbourhoods and local centres provide for many of the day to day needs of the city's wide range of communities. They provide a network of nurseries and primary schools, local shops, services and opportunities for local employment, parks and open spaces, meeting places, festivals and events. The local plan can play a key role in shaping change in these areas, helping to protect those aspects that are valued and seeking to create the conditions to enable positive enhancements to take place in the form of development or in changes to the public realm and associated parks and open spaces.

5.53 The priorities for our neighbourhoods are:

- **Support real liveable neighbourhoods**, with accessible, diverse and thriving local centres, with health facilities and employment opportunities
- **Delivering opportunities in Bath's neighbourhoods** – enabling high quality, small scale residential development at appropriate densities. Development can bring investment to improve the public realm, amenities and infrastructure, and support improved public transport and active travel routes.

## Green and blue infrastructure

5.54 The city's rich network of green and blue infrastructure is a hugely valuable resource that contributes significantly to the health and wellbeing of residents and visitors, and is crucial to climate resilience, mitigation and for nature recovery. A number of key projects such as Bath River Line and Bathscape have seen significant investment in the management and enhancement of accessible green open spaces, tree planting and the surrounding countryside – the green setting of the city is one of the six key attributes of the City of Bath World Heritage site.

## Site Options

5.55 Specific site allocations and development management policies that promote new development and protect existing land uses are effective planning tools for managing the use of land. Many site allocations already exist in the current local plan and they have generally proven to be robust in achieving their objectives.

5.56 It must be acknowledged though that some sites have not yet been delivered and this is normally related to the ability of the market to deliver. It is proposed to thoroughly review and modify the existing site allocations to ensure that they reflect renewed priorities of the council, such as the climate and ecological emergencies and to demonstrate that needs are properly planned for.

5.57 The council propose to allocate larger or significant development sites and that other opportunities for smaller scale or organic redevelopment and change (e.g. garage courts, change in local centres, etc) will be supported by a positive and enabling policy framework.

5.58 To help diversify housing supply by encouraging smaller scale developers and self-builders, it is important for the local plan to embrace incremental change rather than expecting comprehensive development at a larger scale. This is often difficult to achieve and may never come forward due to complexities of land ownership. The policy framework will be supportive of incremental change and seek to simplify design and development requirements through design codes and guidance. Where appropriate, such as in the wider public interest, incremental changes will need to accord with wider spatial framework.

5.59 In addition, there could be opportunities to explore potential for improvements to some of the existing housing areas in Foxhill and Twerton in Bath. Working with Curo, who manage much of the social housing stock in these areas, we will explore improving existing housing, including making it more energy efficient (providing carbon emission benefits in line with the climate emergency), more affordable to run and providing more comfortable and better living conditions. This could also offer the opportunity to improve the quality of place and potentially to increase the number of homes, thereby providing additional affordable housing (including social rented housing) which is needed. The overall number of homes also needs to be increased to be able to access Homes England funding.

5.60 Following consultation on these site options, a detailed assessment of the transport impact of each site will be undertaken, to inform selection of sites to be included in the Draft Plan. The cumulative impact of all sites included in the Draft Plan will also be assessed. Any site allocations in the Draft Plan will define the site specific interventions that are required.

5.61 There are a range of **potential** site allocations that are included in the Local Plan Options Document, as follows:

- Existing [site allocations](#) are proposed to be refreshed and refined to reflect updated priorities and to address the climate and nature emergencies.
- In the Options Consultation that was undertaken in the spring of 2024, reference was made to the need to undertake a more fundamental review of the Newbridge Riverside policy area. This has now been undertaken as an important part of the evidence base to inform the future of this area. Called the Production Quarter Masterplan, it seeks to continue to protect and enhance its important employment role, whilst optimising the potential development capacity of the area. This will entail protecting existing floorspace and enabling its evolution as an employment area to focus on industrial, advanced engineering, R&D businesses and the Locksbrook Creative Industry Hub. No residential or PBSA would be permitted.
- Other sites on the edge of or close to Bath:
  - A new site is proposed for employment purposes to the south west of the Odd Down Park and Ride, on the southern side of the A367.
  - Land to the West of Bath is also considered as a potential location for helping to meet the development needs of the city, and a range of options are proposed, including a new option that maximises the development potential of this area. Evidence shows that development here would cause substantial harm to the World Heritage Sites. It is included within this Local Plan Options Document to help ascertain whether substantial public benefits from strategic scale development can be identified that might outweigh this substantial harm and to facilitate continued engagement with government on growing the city.

- The council has assessed the potential of other smaller, non-strategic opportunities on the edge of the city and has identified the Bath Equestrian Centre at Weston as a potential development site. It is included in this document to test whether the need for and benefits of providing housing now outweigh the acknowledged harm to National Landscape (formerly AONB), the WHSs or the conservation area. Other potential opportunities assessed are not identified as options in this document because the significant degree of harm, primarily to the WHS or Cotswolds National Landscape, is considered to outweigh the limited public benefits of development.
- Sulis Club – this site is owned by the University of Bath. An option to consider removing the site from the Green Belt, subject to demonstration of exceptional circumstances, to facilitate development for PBSA and other university related uses is presented.
- A potential development location south of Burnett on the A39 was included in the previous consultation for further exploration and to establish whether this has potential as a longer term location for growth. This concept generated a significant response from the public consultation and this has helped to inform a review of the process for identifying new settlements. New settlements will not form part of this local plan as it cannot be demonstrated that they will deliver housing and other development to meet needs during this plan period. However, one or more new settlements may form part of a longer-term strategy for development. The council is therefore consulting on a 'New Settlement Methodology' to assist in identifying areas for future growth and it is within this context that areas such as 'south of Burnett' may be reconsidered in the future.

## Site Allocations

5.62 A key purpose of this site allocations element of the local plan is to demonstrate how different land uses can be delivered, reflecting evidence and the priorities of the council. Many of the sites/areas within the city set out below are already allocated in the adopted Core Strategy/Placemaking Plan. This local plan will review these allocations and set out our proposed approach. Please note that hyperlinks are embedded into the headings of each site allocation in the Bath section. Please click on these to see the existing site allocation policies for reference.

5.63 The site allocations will also contain key development requirements and design principles to ensure that the development outputs contribute towards the creation of great places, that they seek to optimise the use of land, are properly integrated into and respond appropriately to their sensitive contexts, that they address the climate and ecological emergencies, and improve health and wellbeing.

5.64 In accordance with the National Planning Policy Framework (NPPF) 'the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve'. This contextual approach reflects the existing planning policy framework in Bath, where a set of ['Design Values'](#) has been established and which provide the context for considering the design of new buildings and as a means of creating authentic and locally distinctive and enduring places. These 'Design Values' continue to remain relevant in the consideration of new development proposals and in managing the potential tension between optimising the use of land and ensuring that development makes a positive contribution to local character and distinctiveness.

5.65 For all of the site allocations, it is proposed, where relevant, to update the range of development requirements to include references to the need for a transformational approach to the protection and enhancement of biodiversity. This aims to deliver outcomes that genuinely contribute to nature recovery, whilst enabling new development, improving the relationship to the river, the integration of green infrastructure and the need for lighting in this location to safeguard the dark corridor for bats.

5.66 The new site options towards the end of this section have been evaluated using the Department for Transport's Connectivity Tool, which integrates transport and land use data to produce a national measure of connectivity for any location in England and Wales. This tool assigns each location a grade from A to J, where A indicates the highest level of connectivity within Bath and North East Somerset, and J the lowest. The assessment is based on the current sustainable transport network and existing land uses such as schools and shops, and does not take into account planned or future improvements. The grading from A to J is not an overall ranking of site options and in deciding which sites are allocated in the Draft Local Plan other sustainability criteria and deliverability factors will also be considered.

## **Milsom Quarter:**

5.67 The Milsom Quarter Masterplan is a major regeneration project led by the council that proposes that the area becomes the fashion destination for Bath and the South West. It has identified the Old Post Office as the site for the Fashion Museum, as a city centre cultural landmark, and the development of Broad Street Yards to support creative and entrepreneurial uses, complementing the fashion, interiors and homeware economies in the surrounding streets. It includes the [Cattlemarket Site](#), which is an existing site allocation that was recently updated as part of the Local Plan Partial Update (LPPU). The Milsom Quarter Masterplan also has an aspiration to introduce approximately 180 new homes through new build or through the repurposing of upper floors that are currently vacant.

### **Options:**

- No change proposed to the existing policy covering the Cattlemarket site.
- Introduce other policies or site allocations such as for Broad Street Yard.

## **Bath Central Riverside**

5.68 Acknowledging that there is a planning application for a new stadium on this site that is still being considered, the council has previously committed to review this site allocation, particularly in relation to the development of a new stadium. In the adopted Core Strategy the development of a sports stadium in the city is identified as an important element of the spatial strategy for Bath. Preparation of this local plan provides an opportunity to review the role of a sports stadium in the strategy and if considered still to be important, whether it should be delivered on this site. As such there are considered to be three broad options for consultation. They are outlined below:

### **Options**

- Retain the site allocation policy (Policy SB2) as currently worded.
- Review and amend the current Policy SB2 wording to provide greater clarity on or to change the development requirements and design principles.
- Delete the Policy SB2 reference to this site being appropriate for a new stadium.

## **Manvers Street**

5.69 This is an existing site allocation that forms part of a wider and major regeneration project that is being taken forward by the council. It is anticipated that delivery will broadly reflect the current site allocation policy.

### **Options**

- Retain existing policy requirements
- Update policy requirements to provide more flexibility in terms of the office space requirements by enabling a wider range of hybrid business space to suit start-up business and research & development space to be delivered.

## Bath Quays North

5.70 The redevelopment of this site is one of the council's flagship regeneration projects and is a key part of the Bath Riverside Innovation Quarter (BRIQ), a wider area along the river corridor that will be transformed into the city's main business location to help to redefine the city's economic profile.

5.71 Outline consent was granted for a comprehensive mixed use development in April 2019, but the delivery of this complex site has not progressed. The site will continue to be the key location for office led development but one of the proposed options is to slightly broaden this scope to enable a wider range of hybrid business space to enable start up business and research & development space to be delivered.

5.72 The council has been working with the University of Bath on formulating proposals for the redevelopment of this site. The approach is to continue to meet the existing core policy requirements for this site and assist the university in its transition towards greater investment in enterprise, research and innovation. Delivery of this site is dependent on securing an anchor tenant and this is seen as the catalyst for further investment on adjacent sites, and a revival of Bath's economic performance.

5.73 The proximity of the site to the rail station, its riverside and city centre location, with the facilities and amenities that it provides are key assets that contribute towards its appeal. It is proposed to update the policy to ensure it reflects the council's priorities, including clarifying that Purpose Built Student Accommodation (PBSA) or student accommodation continues to be unacceptable as this will impede the delivery of other council objectives.

## Options

Two options in respect of this site are presented below:

- a) Retain the existing land use mix (primarily office space, Class E(g)(i)) and review and amend the current policy wording to provide greater clarity on or to change the development requirements and design principles.
- b) Whilst ensuring this site continues to play a key role in the future economy of the city provide a greater degree of flexibility in terms of the land use mix required by policy. This could allow a change in the requirement to provide a 'minimum of 20,000 sqm of office floorspace' (Class E (g)(i)) and slightly broaden the scope to allow a wider range of hybrid business space to enable start up business and research & development space (Class E(g)(ii)) to be delivered. Continue to allow a residential element and continue to exclude student accommodation/PBSA.

**Note:** Evidence from the Future Economic Needs Assessment Update (May, 2025) recommends around 74,000 – 79,000 sqm new office and research and development space should be delivered in the city throughout the plan period (in addition to that already committed). To allow a reduction in this important location would add pressure on other scarce sites to meet this need. The existing policy states that 'redevelopment of this site is the council's flagship regeneration project; it will be an area that will be transformed into the city's main business location and will help to redefine the city's economic profile.' Changing the site allocation approach should not undermine this important objective.

## South Quays and Riverside Court

5.74 This is a key development site which was granted planning permission in 2017 and has now delivered approx. 7,900sqm of office and creative workspace. No1 Bath Quays is Bath's first new speculative development for decades. The building provides brand-new grade A and EPC 'A' office accommodation. The refurbishment of Newark Works provides creative workspace that is owned and managed by TCN, a company that own and manage creative workspace. There is outline planning permission for a residential development parcel of around 60 apartments, but this has not been delivered.

5.75 Riverside Court is currently used as offices and there have been a number of applications for changes of use. The most recent application (20/03608/FUL) was refused due to the strong economic reasons demonstrating that the loss of office floorspace would be inappropriate.

### Options

- Review and amend the current policy wording to provide greater clarity on or to change the development requirements and design principles.
- Allow more flexibility in relation to the delivery of the residential element within the existing allocation, allowing the consented floorspace in the South Quays site to change to an employment use. Housing not provided on this site would then need to be delivered elsewhere.
- The current policy for Riverside Court states: 'The redevelopment of Riverside Court should retain as a minimum the existing levels of employment floorspace and be complemented by residential development that contributes towards the city's housing requirements.' Should this policy wording for Riverside Court:
  - remain as it is;
  - be amended to provide more flexibility in terms of land use mix; or
  - be strengthened to require more employment floorspace to be delivered?

## South Bank

5.76 This area lies immediately to the west of the South Quays site and to the east of Sydenham Park. It is under two principal and separate land ownerships; the car showrooms and the Travis Perkins Builders Yard. These uses are important functions within the city, however other uses such as offices and residential that optimise the riverside location, the close proximity to the city centre and the high levels of public transport accessibility, may well come forward within the plan period.

### Options

- Review and amend the current policy wording to provide greater clarity on or to change the development requirements and design principles.
- The current policy for South Bank requires the total development to deliver a minimum of 5,000 sq.m. Gross Internal Area (GIA) of office floorspace, and a minimum of 100 dwellings. If the two parts of the site are to be delivered at separate times, then each part is expected to deliver an approximately even mix of uses. Purpose built student accommodation in this area is not acceptable as this would impede the delivery of other council objectives.

Should this policy:

- remain as it is;
- be amended to provide more flexibility in terms of land use mix; or
- be strengthened to require more employment or more residential floorspace to be delivered? Perhaps keep as is? Sufficient flexibility or options are provided.

## **Green Park Station West & Sydenham Park**

5.77 This is a complex area, with a variety of site ownerships and a diversity of uses. It comprises the following components:

### **Green Park Station West (SB7A):**

Green Park Station, and the units facing James Street West.

Sainsbury's.

### **Sydenham Park (SB7B):**

Bath Riverside East: the former Homebase site and its car park, and overflow Sainsbury car park.

Pinesway: Pinesgate offices and the associated road gyratory.

Pinesway Industrial Estate.

5.78 The existing site allocation acknowledged that this area is complex and had uncertainty in terms of delivery. It rightly anticipated that delivery will be undertaken in a phased or piecemeal manner, with different landowners bringing forward development at different times, as and when their sites become available. It stated that to avoid the delivery of sub-optimal outcomes that do not deliver the wider opportunities in the area, it was crucial for the local plan to provide the urban design framework within which these individual developments could be delivered. This framework was acknowledged as needing to be flexible enough to respond to changing circumstances, yet it also needs to be robust enough to ensure that it can be delivered. It is proposed to review and update this framework to enable development to be delivered that better meets our objectives, and to consider whether creating separate site allocations that better reflect land ownership parcels is a more pragmatic response.

5.79 A planning application was allowed on appeal (September 2021) for the redevelopment of the Homebase site to provide a later living scheme of 288 units and 1,865 sqm of office floorspace. Due to the later living scheme being in the C2 use class it was not possible to secure affordable housing from the scheme. The consent enabled the subsequent demolition of the Homebase building, but the scheme was not progressed beyond this. There is a current planning application for the same site which has yet to be determined. This is proposing to provide a mixed use development, which principally includes residential build to rent dwellings and shared living accommodation.

## Options

- Generally maintain current policy wording and update to better reflect the climate and ecological emergencies and review the alignment of the sustainable transport route through the site, if required.
- Review the proposed land uses on the site to reflect the evidence base and ensure that housing that is more affordable is delivered, that existing employment floorspace is protected and additional floorspace delivered.
- Create separate site allocations for each development parcel.

## **Bath Riverside**

5.80 This large and important site has been delivering new homes for the city for the past fifteen years. It comprises a number of different land parcels, and development on these parcels has largely either been completed, has the benefit of consent, or is subject to a current planning application. The most recent consent which covers the former gasworks site is now under construction and is anticipated to be completed. Changes were made to the existing policy wording to reflect the climate and ecological emergencies as part of the LPPU and there is considered to be little justification for any further changes at this stage.

5.81 It is proposed to devise a separate site allocation policy for the Westmark Site (see below).

5.82 No change proposed to the existing policy.

## **Bath Press**

5.83 This site is finally under construction and subject to this being completed , it is proposed to delete the existing site allocation.

## **Roseberry Place**

5.84 Consent granted for mixed use scheme of Build to Rent residential and office floorspace. The former has been completed, whereas the office element has not progressed despite long periods of marketing.

## **Options**

- No change proposed to the existing policy.
- Amend policy to allow a wider range of hybrid business space to enable start up business and research & development space to be delivered.
- Amend policy as above, but allow for mixed use development to potentially allow other forms of housing that meet identified need i.e. homes that are suitable for those working in the local economy, and not PBSA.

## **Westmark Site, Windsor Bridge Road**

5.85 Currently this site is part of the [Bath Riverside Site Allocation Policy SB8](#).

Given that no progress has been made on the delivery of this site and that planning applications are at an advanced stage on the remaining Bath Riverside sites, it is proposed to generate a separate site allocation for the Westmark Site.

5.86 Based on the 'Future Economic Needs Assessment Update' evidence base, the Victoria Park Business Centre, which forms part of this site, is to be protected from development. For the remainder of the site it is proposed to require a residential led development that includes the provision of specific housing products that better meet local needs. Purpose Built Student Accommodation (PBSA) is to continue to be excluded.

## **Stable Yard Industrial Estate**

5.87 This is an industrial location, which is well occupied and contributes towards meeting an identified need in the city. Based on the Employment Needs Assessment evidence base, the Stable Yard site is to be protected from development.

## **The Production Quarter**

5.88 This location comprises the Locksbrook Road and Brassmill Lane industrial areas and is currently referred to as Newbridge Riverside in the adopted Local Plan. It accommodates a wide range of businesses that perform a crucial role in the diverse economy of the city. Part of this area also includes the Locksbrook Creative Industry Hub (current Policy SB22), a collaboration with Bath Spa University, which relates primarily to the creative arts sector. See below for updated reference to Weston Island, which is now anticipated to continue to be used by First Bus who are expected to invest in the electrification of their fleet and of the island (which they own).

5.89 In the Options consultation that was undertaken in the spring of 2024, reference was made to the need to undertake a more fundamental review of the Newbridge Riverside policy area. This has now been completed and forms an important part of the evidence base to inform the future of this area. The 'Production Quarter Masterplan' involved many conversations with the existing businesses in the area and it seeks to continue to protect the important employment role of the area, whilst identifying opportunities to optimise the potential development capacity and deliver environmental enhancements.

5.90 The Production Quarter Masterplan identifies that there is significant scope to reimagine the economic role of this area and to intensify development opportunities benefitting the city's economy and contributing towards wider ambitions in the Local Growth Plan, as well as ongoing work on the Bristol to Bath Growth Zone, a key component of WECA's Growth Strategy. The Masterplan seeks to respond to the landscape, natural environment and heritage context of this location and generate an ambitious, deliverable, future scenario for how this current employment location could be reimaged. It is anticipating an imaginative and creative response to the untapped development potential of the area, that optimises the existing and planned transport infrastructure, set within an ecologically rich landscape that capitalises on its integral relationship with the river environment.

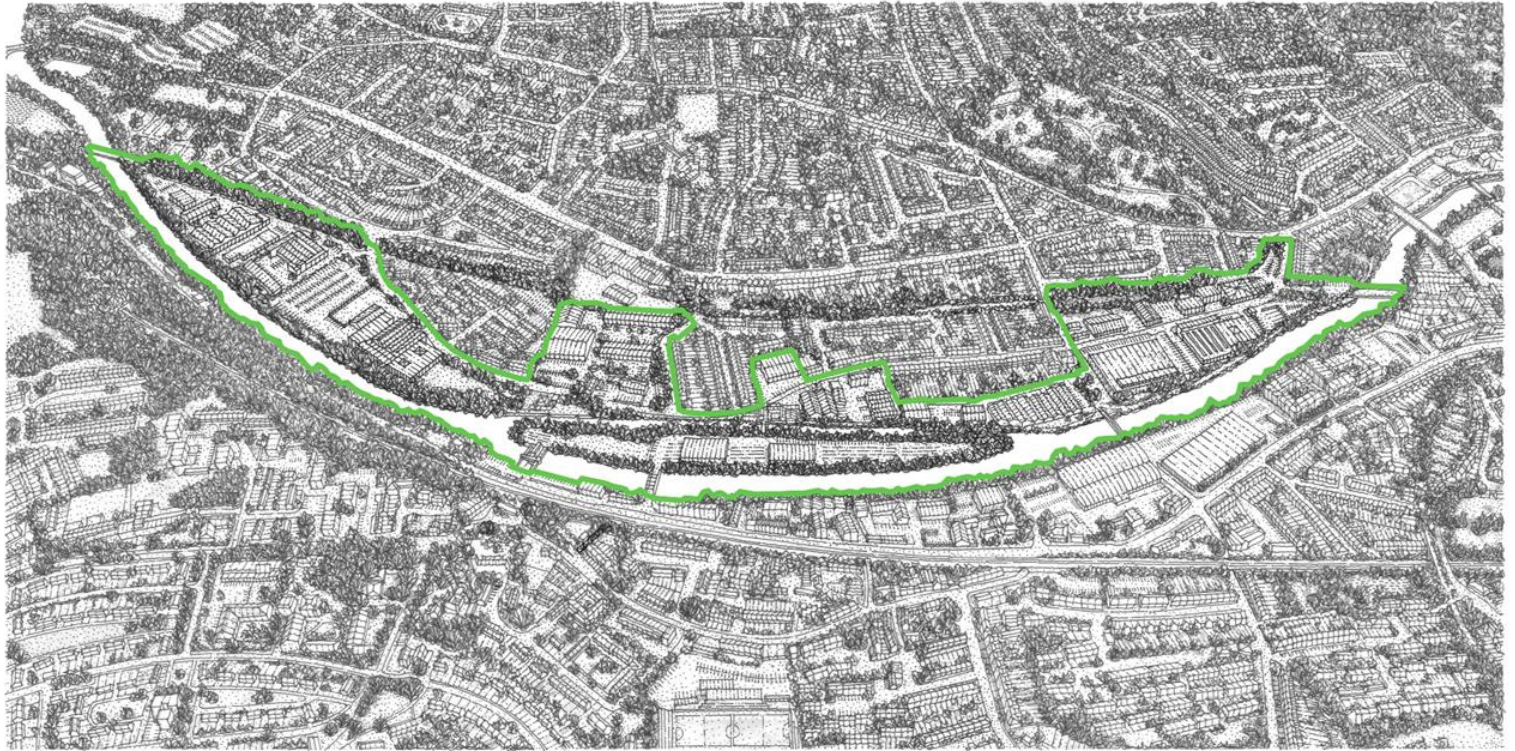
5.91 It is considered that this area has the potential to play an important, even iconic, employment role for the city, reflecting its global recognition, reputation, and history of innovation. Such an approach could complement the city's central office and workspace core and provide a more diverse employment space offer for the creative industries sectors, advanced engineering sector (such as many of the existing anchor businesses), research and development, biosciences, and other sectors that have specific spatial or operational requirements.

5.92 The existing floorspace in the Production Quarter Masterplan area is approximately 50,000 sqm. Subject to existing sites being available for redevelopment, there is a theoretical potential to double this total floorspace to around 100,000 sqm. The ability to achieve this scale of change will require public sector intervention and collaboration with interested parties, as well as significant investment.

Note: This is a theoretical exercise providing initial estimates of potential capacity of sites throughout the Production Quarter. Landowners or businesses within the area have not been consulted specifically on this capacity assessment and much more analysis will be required. The GIA (gross internal areas) have been calculated by measuring the approximate GEA (gross external areas) achievable within the site and a notional 20% reduction assumed.

## Options

- Intensify the development potential of this area, in terms of capacity, and promote the location for a wide range of businesses within the industrial, advanced engineering (such as many of the existing anchor businesses), clean tech, health and life sciences, transport and storage, and creative industries. This option would ensure this area continues to serve as the main location for industrial space within the city.
- Identify those uses that would not be permitted as they will undermine the employment led objectives, i.e. residential (including co-living and PBSA), and more academic teaching space.
- Within a clearly defined landscape and ecological framework and infrastructure plan should the site allocation have a consistent approach across the whole of the 'Production Quarter' area or should it be more granulated and have different approaches in different parts? This could allow a more nuanced approach tailored to the specific characteristics and potential of the different areas. For example:
- **Locksbrook Road:** comprising Horstman, Bath Spa University, the Locksbrook Creative Industry Hub, various operations including trade counters.
- **Central area:** adjacent to Weston Island and comprising of a finer grain of mixed uses including smaller scale employment units, residential and food and beverage outlets.
- **Brassmill Lane:** A mix of industrial type uses and trade counters including the Maltings trading estate, larger employers and manufacturers such as Rotork and Roper Rhodes.



*Figure 3: The Production Quarter Area*

## Weston Island

5.93 First Bus have emerging plans to electrify their Weston Island depot to allow for the ongoing electrification of their fleet. This significant investment is very much welcomed by the council as it contributes to the council's net zero ambitions and results in state of the art electric buses, improved air quality and significant reductions in carbon emissions.

5.94 This investment is a clear indication that First Bus are very unlikely to vacate Weston Island within this plan period. And the implication of this is that Weston Island is not going to be available for other uses that had previously been considered for this site.

5.95 However, given that the proposed electrification works are contained within the eastern half of the sites, there is, subject to agreement from the landowner, a potential opportunity for other uses to be introduced on the western half the site.

5.96 As per Evidence from the Future Economic Needs Assessment Review (May 2025), there are sound planning reasons to retain an industrial focus for this portion of the site. It is also in Flood Zone 3 which precludes residential and other vulnerable uses.

5.97 Notwithstanding the evidence to retain this portion of the site for industrial purposes, there is an aspiration from Bath Art Depot (BAD) to be located onto the site.

5.98 Whilst this concept is supported in principle, there is currently no evidence of how this could be delivered and therefore it is not reasonable, at this stage, for the local plan to seek to allocate land for this purpose. The local plan will however continue to be supportive of the concept, with the potential allocation being related to whether further evidence regarding its deliverability can be demonstrated during the production of the local plan. It should also be borne in mind that the use of the site for these purposes might impede the council's delivery of its other economic priorities, such as reusing the site for industrial purposes. This will need to be explored further in preparing the Draft Local Plan.

5.99 Bath Spa University has an aspiration to deliver and evolve the Locksbrook Creative Industry Hub and there could be potential to utilise Weston Island as part of this. If this concept provides employment floorspace it has the potential to contribute towards the vitality and vibrancy of the wider area. Purpose Built Student Accommodation (PBSA) and teaching space would not be supported.

5.100 One of the specific requirements in the current site allocation policy is to 'Provide a welcoming, spacious and safe public sustainable transport link across Weston Island and its respective bridges and provide high quality public realm.' It then goes on to state that 'there may also be opportunities for more public facing uses such as creative, arts based activities. Such uses could help to animate and overlook this new link'. Therefore, if any employment led development were to come forward on the western portion of the site, or indeed any proposals from Bath Spa University as part of the Locksbrook Creativity Hub concept and/or from Bath Art Depot, there would be a requirement that development provides a positive frontage to this route to help to animate and provide natural surveillance of the new link.

## Options

The western portion of the site is to be protected for industrial uses in line with the Production Quarter area as outlined above.

Whilst industrial uses are the priority, and subject to the space requirements of particular uses, there may be the potential to combine the industrial land use requirements with some or all of the, Locksbrook Creative Industry Hub and Bath Art Depot elements.

## Twerton Park

5.101 This policy was updated in the Local Plan Partial Update.

5.102 No change is proposed to the existing policy.

## Royal United Hospital (RUH), Weston

5.103 The RUH have commissioned a new Estates Strategy for this site. Once this has had final sign off within the RUH Bath NHS Foundation Trust it is the intention, subject to review, to include reference to it and support its delivery, as appropriate, through the local plan.

5.104 There is strong evidence that the lack of availability and affordability of housing is making it difficult for some employers to attract and retain staff. Where these employers control or own land, such as the RUH, there could be opportunities to facilitate the delivery of employer linked housing that is 100% affordable.

5.105 Provided that land will not be required for healthcare or car parking during the Plan period, the council supports the provision of 100% affordable residential accommodation (Class C3) of a range of sizes and types, for use by key workers associated with the RUH.

5.106 Changes to the existing policy will be considered in the context of the new estates masterplan.

### **Hartwells Garage**

5.107 Outline planning permission for a mixed use development comprising up to 104 residential units and the provision of up to 186 student bedrooms site was granted on appeal in March 2021. Delivery has been delayed but is understood to still be progressing.

5.108 No change proposed to the existing policy.

### **Sion Hill**

5.109 Owned by Bath Spa University (BSU) and currently allocated for housing. This site was allocated in the LPPU and the policy is considered to remain fit for purpose.

5.110 No change proposed to the existing policy.

### **St Martins**

5.111 Recently introduced and allocated in the LPPU and the policy is considered to remain fit for purpose.

5.112 No change proposed to the existing policy.

## Sulis Down

5.113 The site was removed from the Green Belt and allocated for development in the Core Strategy. The extent of the site allocation and policy requirements responded to key elements of the evidence base relating to the harm to the Cotswolds National Landscape, the World Heritage Sites and its setting, as well as important heritage assets such as the Wansdyke. Phase 1 of the allocation is nearing completion and there was a recent appeal into the planning application for the comprehensive masterplan and for phases 3 and 4 that would have provided substantially more development than set out in the site allocation in the adopted Core Strategy. This appeal was dismissed on the following concluding grounds:

*127 The proposed development would provide benefits that carry substantial weight in terms of the delivery of housing, including affordable housing. There would also be a range of other benefits that carry moderate and limited weight. Conversely, I (the Inspector) have afforded substantial weight to the adverse effects on the CNL [Cotswolds National Landscape] and the conflict with CS Policy B3a and other local and national policies relating to National Landscapes. The harm to heritage assets carries moderate weight and the conflict with policies relating to mixed use development carries limited weight.*

*128. On balance, given that CS Policy B3a limits development within the site allocation to around 300 dwellings unless all the placemaking principles can be met, which is not the case here, my conclusion is that the adverse effects outweigh the benefits. The proposed development would be contrary to the development plan taken as a whole, and there are no material considerations to indicate that planning permission should otherwise be granted.*

5.114 It is a very sensitive development site and given that the evidence relating to harm has not changed and being mindful of the recent appeal Inspector's conclusions, it is not proposed to amend this site allocation.

5.115 No change proposed and continue to protect the field to the south of the Wansdyke and the field to the east, adjacent to Southstoke Lane.

## **Burlington Street**

5.116 This is an existing site allocation that is considered fit for purpose.

5.117 No change proposed to the existing policy.

## **University of Bath**

5.118 The policy framework for the University of Bath was subject to significant review as part of the Local Plan Partial Update. It was informed by a new Masterplan that provided a vision of the future for the Claverton Campus, enabling the delivery of the development and infrastructure required to address the needs and expectations of its students and staff, and to facilitate the university's sustainable growth in a manner that also enhances the unique beauty and environmental quality of the campus.

5.119 Whilst the existing policy is robust there could be the possibility of exploring whether more PBSA could be provided on campus to help facilitate growth in student numbers without impacting further on the city. This could only be achieved through the review of current car parking provision or through intensifying existing developed areas of the campus (without increasing heights or creating other adverse impacts).

## **Sulis Club**

5.120 This is a sports ground owned by the University of Bath. It is on a gently sloping site on the edge of the plateau in a highly sensitive skyline location on the edge of the World Heritage site, and visible from the surrounding countryside.

5.121 The current adopted policy SB19 states: Sulis Club Outdoor Sports area – Proposals for development will be judged against national planning policy within the NPPF, including that relating to AONBs (now National Landscapes) and Green Belt, as well as the World Heritage Site and its setting and Outstanding Universal Values. For the Sulis Club the adopted policy SB19 enables the appropriate redevelopment of previously developed land, within the parameters set by the NPPF. Through this options document consideration needs to be given as to whether the Sulis Club site should be removed from the Green Belt (subject to demonstrating exceptional circumstances) in order to facilitate development primarily for PBSA.

## Options

- No change to current policy SB19.
- Remove the Sulis Club from the Green Belt (subject to demonstrating exceptional circumstances) and allocating it for the development of PBSA/other university uses. Evidence through the LHNA and ongoing conversations with the University of Bath demonstrate the ongoing need for additional PBSA (both to accommodate future growth in student numbers and potentially to reduce pressure for the creation of new HMOs in the city). This option is subject to further evidence and an assessment of whether the potential development is compatible with the National Landscape designation, the requirement to protect the Outstanding Universal Value of the WHSs, the need to strengthen the important well-treed skyline, and respond to the importance of this area for bats.



Figure 4 Sulis Club

## **Odd Down – land to the south west of the Park & Ride**

- 5.122 This area is located to the south west of the existing Park and Ride, and to the south east of the A367. It is within the Green Belt, within the indicative setting of the World Heritage Sites outside but adjacent to the boundary of the Cotswolds National Landscape, and part of the area is a Site of Nature Conservation Interest. In addition, there are known to be small blue butterflies in the area. It is less than 2 km from the Bath & Bradford on Avon Bats Special Area of Conservation (SAC) designated in part due to its internationally important populations of Horseshoe and Bechstein bats. The area is likely to contain key commuting and foraging/feeding habitats for the bat populations of the SAC.
- 5.123 This area is proposed as an option for development for the first time in this local plan and two different sized site options are proposed and both are identified as potential employment sites. This will assist in serving the city, enabling the regeneration of more central sites, and help to meet evidenced need. Employment uses in this location are on the same corridor as the successful Bath Business Park at Peasedown St John, where options for its extension are set out in chapter 7 as part of the wider strategy for addressing the need for more employment uses.
- 5.124 The land to the north west of the A367 is not proposed to be allocated as evidence indicates that development in this location would be likely to result in substantial harm to the World Heritage Sites and other heritage issues and would result in moderate to high landscape sensitivity. In addition, there are understood to be geological and land stability concerns about development in this area.
- 5.125 Option 1 excludes the existing Bath Waste Recycling business and Option 2 includes it. There has not been any discussion about this potential allocation with the existing business and discussions will need to take place as part of the public consultation. It is not envisaged that the potential allocation would have any direct impact on their current operations.

5.126 A site allocation would provide a clear policy framework that would allow further employment uses to come forward in this area, subject to a set of development requirements and design principles. These are yet to be drafted but they would seek to ensure that any development proposals are responsive to the sensitive context of the site and protect valued assets.

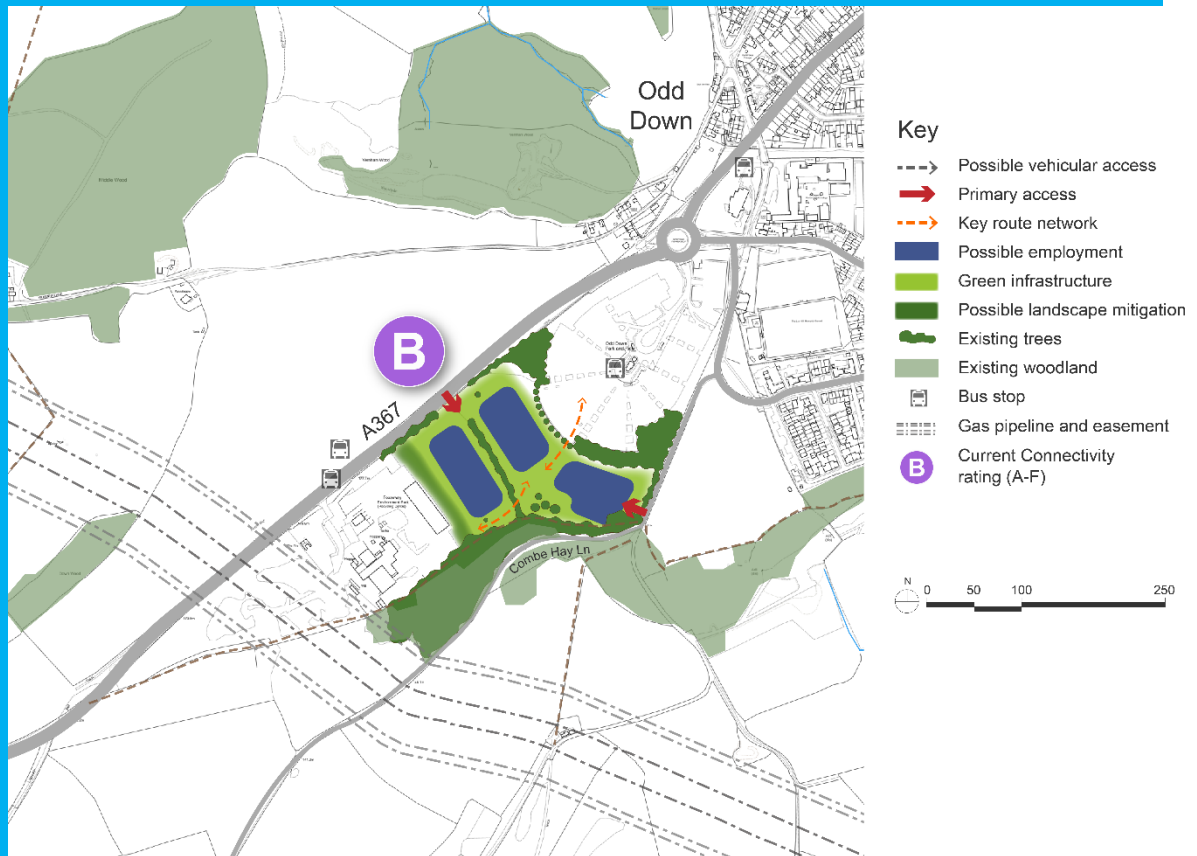


Figure 5: Odd Down Option 1

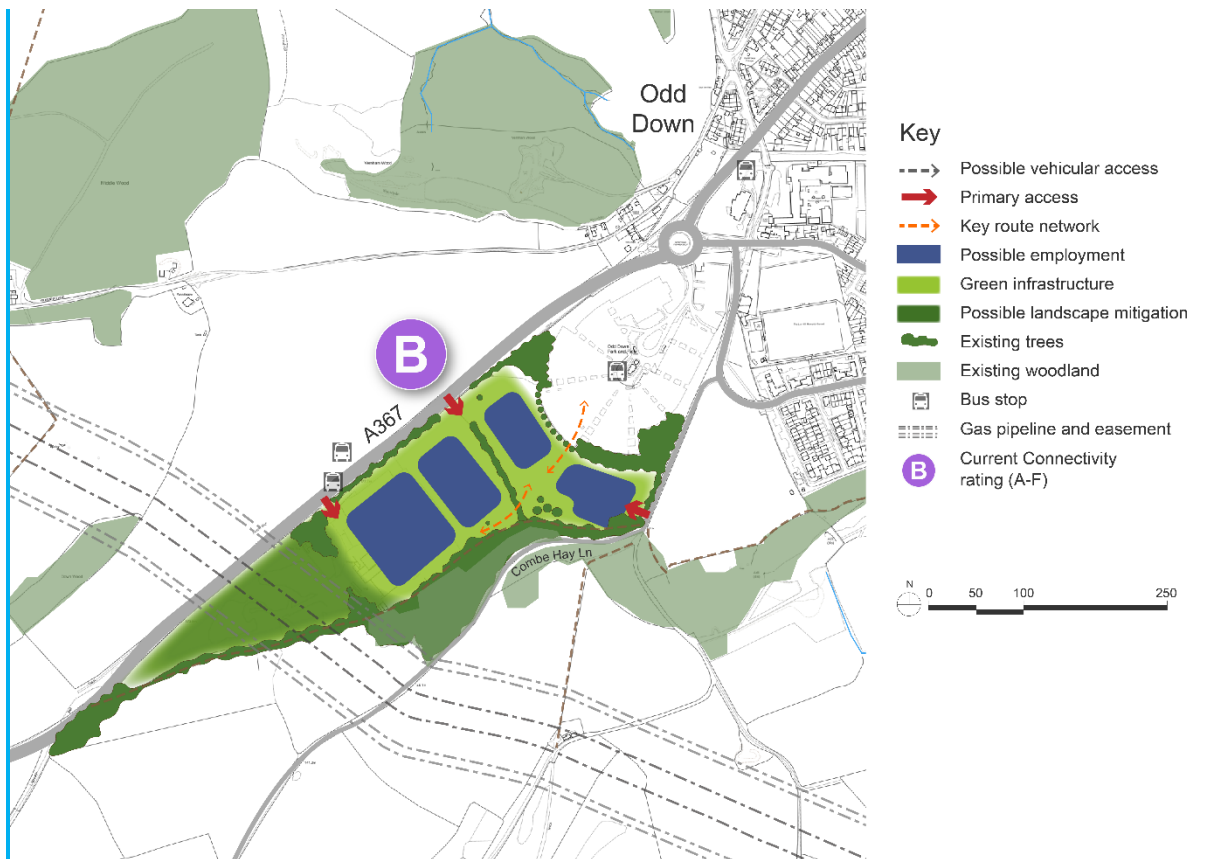


Figure 6: Odd Down Option 2

## **Bath Spa University at Newton Park**

- 5.127 Bath Spa's Newton Park Campus sits within a sensitive historic context including in the core of a registered (Grade II\*) historic parkland 'of outstanding interest' which includes a Scheduled Monument (St Loe's Castle), three Grade I listed buildings (The Manor House, Castle, and Castle Gatehouse); one Grade II\* listed building (the Stables); and one Grade II listed building (the Dairy). The walls to the Italian Garden are also listed (Grade II\*). The wider parkland beyond the campus also contains part of the Wansdyke Scheduled Monument and other listed buildings.
- 5.128 The campus lies in the Green Belt where development potential is constrained i.e. national policy makes it clear that development is inappropriate unless it is either complete or partial redevelopment or limited infilling as long as it doesn't have a greater impact on openness than the existing development
- 5.129 Ecologically the campus hosts a number of lesser horseshoe bat roosts, which forage in the surrounding parkland. Both the campus and the parkland in which it sits are within the Green Belt.
- 5.130 No material changes are proposed to the existing policy, however it will need to be reviewed and updated to reflect the latest terminology and correct references in the NPPF.

## West of Bath

5.131 One of the locational options that is being considered to help address the development needs of Bath is land to the west of the city. This area has potential to provide housing that is more affordable, new office or industrial buildings, or potentially to relocate the existing Newbridge Park and Ride, thereby freeing up the existing site for other forms of development.

5.132 Development should be exemplary with regards to its sustainability and quality, with an efficient use of land, and excellent connections to public transport and active travel which complement the council's aspirations for high quality placemaking. It would be of higher density, include a broad mix of residential tenures, with supporting social infrastructure and access to natural green and blue spaces.

5.133 Development would deliver public benefits and help to address objectively assessed housing and other economic needs, but this has to be weighed against the substantial harm that all the options will cause to the World Heritage Sites and impacts on the setting of the Cotswolds National Landscape. To progress development through the Draft Local Plan we would need to demonstrate that the public benefits outweigh the substantial harm.

5.134 Option 1 offers a potential development capacity of between 850 to 1,150 dwellings and the proposal seeks to achieve partial mitigation in relation to the impacts on the Cotswolds National Landscape.



Figure 7: West of Bath Option 1

5.135 Option 2 provides for a range of about 1,100 to 1,450 homes and would cause greater harm to the setting of the Cotswolds National Landscape than option 1. This scale of development presents the opportunity to provide more social infrastructure such as a primary school and a local shop, which could also benefit the neighbouring communities of Newton St Loe and Corston.



Figure 8: West of Bath Option 2



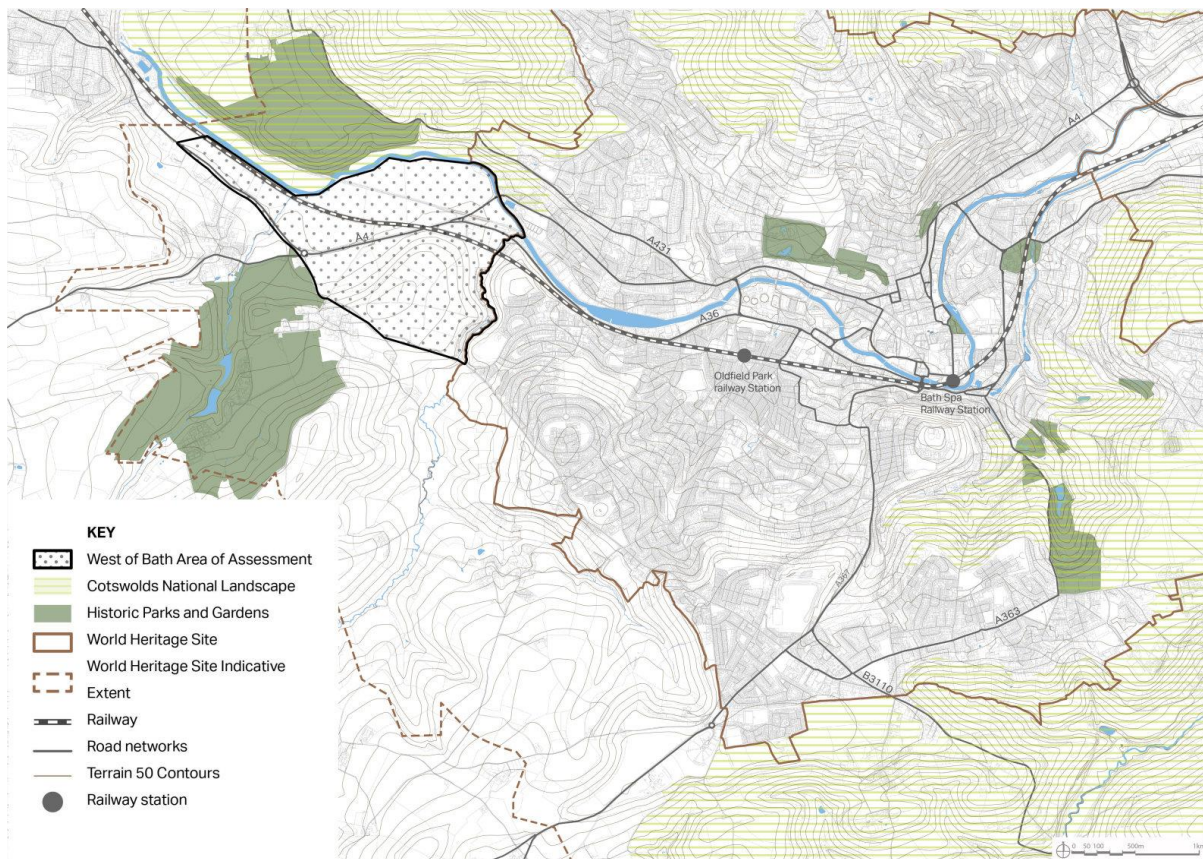
5.136 Option 3 optimises the development opportunities within the area, whilst avoiding flood zones and causes greater harm to the setting of the Cotswold National Landscape than options 1 or 2.

5.137 The benefits of this option are that it could deliver a thriving mixed use community on the western edge of Bath, with a range of around 1,500 to 1,950 homes, a healthy proportion of which would be affordable to help address our pressing housing needs, a new school, and a vibrant district centre. There would be an opportunity for the development of a significant amount of employment floorspace adjacent to the A4 providing a wide range of jobs in innovative sectors. It would be an exemplary development, befitting its sensitive location, with integrated green infrastructure and places for people and nature. It will be connected into Bath and the wider region with high quality public transport and active travel routes.



Figure 9: West of Bath Option 3 – Max development, mixed use, avoiding flood zones

5.138 Whilst development to the West of Bath would have public benefits particularly in terms of providing needed housing and additional employment space, a Landscape and Historic Environment assessment of a range of development typologies in land to the west and south of Bath has been undertaken. The assessment says development is likely to cause substantial harm to the World Heritage Sites (particularly to the attribute of the 'green setting of the city in the hollow in the hills') and that this harm cannot be satisfactorily mitigated. It would also cause harm to the setting of the Cotswolds National Landscape.



Map 11: Map showing West of Bath area from the assessment into potential impacts of development

5.139 The NPPF makes it clear that substantial harm to the WHSs should be ‘wholly exceptional’. In addition, the NPPF makes it clear that protection and enhancement of a heritage asset should be given great weight and that as a WHS is the most significant asset, it should be given the greatest weight.

5.140 Given the technical assessment undertaken and the national policy context it is clear that development West of Bath would face a very high bar and would need to demonstrate substantial public benefits to be included in the Draft Local Plan. Further work will be necessary on the form development might take and to identify the public benefits and harms. This site is included within this Local Plan Options Document to test and ascertain whether public benefits can be identified that would outweigh the harm.

## **Green Belt**

5.141 In addition to identifying whether substantial public benefit of development would outweigh harm to the WHS and its setting, this location also lies within one of the most important areas of the Green Belt and the impact of development on the Green Belt would need to be carefully considered within the context of revised national policy. In order to allocate land in this location for development it would need to be removed from the Green Belt. Exceptional circumstances would need to be demonstrated to justify removing the land from the Green Belt. Whilst such ‘exceptional circumstances’ are site specific this broadly means demonstrating that reasonable alternatives outside the Green Belt have been considered and rejected and that harm to the Green Belt is outweighed by the benefits of development.

5.142 In order to consider harm to the Green Belt, a Stage 1 Assessment needs to be undertaken to understand the contribution of land parcels to the nationally defined Green Belt purposes. This would then be followed by a Stage 2 assessment to identify impacts of development on the Green Belt in this location greater detail. A Stage 1 Strategic Green Belt Assessment is being undertaken by West of England Mayoral Combined Authority (WECA) and the constituent authorities to assess contribution of land parcels to the national Green Belt purposes and to give a provisional indication of land that might meet the definition of 'grey belt'. This is relevant as the revised NPPF makes it clear that land defined as 'grey belt' should be considered for release for development, before other greenfield areas of Green Belt. The Strategic Green Belt assessment work will inform the Draft Local Plan.

## **Corston**

5.143 It should also be noted that if the West of Bath site were to come forward for development and including a primary school then this could open up the potential to consider Corston as a location for further housing led development. At present the village does not benefit from a primary school so an option for development in this location is not currently presented.

## Bath Equestrian Centre

The council has assessed the potential of smaller, non-strategic opportunities on the edge of the city and has identified the Bath Equestrian Centre, located to the north of Weston, as a potential development site with a capacity range of about 50 to 65 homes.

This option is subject to further evidence and an assessment of whether potential development is compatible with the National Landscape designation, the requirement to protect the OUV of the WHSs, and the requirement to preserve or enhance the character or appearance of the conservation area. It is included in this document to test whether the need for and benefits of providing housing now outweigh the acknowledged harm to these important assets. This is consistent with our approach to the West of Bath and for other areas.

Should this site allocation proceed into the Draft Local Plan, it would need to be subject to a set of clear development requirements and design principles that would ensure that any development proposals are responsive to the highly sensitive context of the site and protect valued assets.



Figure 10: Bath Equestrian Centre