

Pre-submission Draft Local Plan (Regulation 19)

Chapter 2 – Bath



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Chapter 2 - Bath

Context

- 2.1 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, however, 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 increasingly priced out – creating a shrinking resident workforce.
- 2.2 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.
- 2.3 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.
- 2.4 Bath is a rare dual inscribed World Heritage Site, one of 22 of the currently inscribed 1,273 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 by protecting the World Heritage Site's green settings of sensitive landscapes from inappropriate development or by controlling the height of new buildings.
- 2.5 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.

2.6 Map 9 below shows where these areas are located in Bath, and the relationship between these areas and the site allocations. Constraints and opportunities are referenced for each allocation where appropriate.

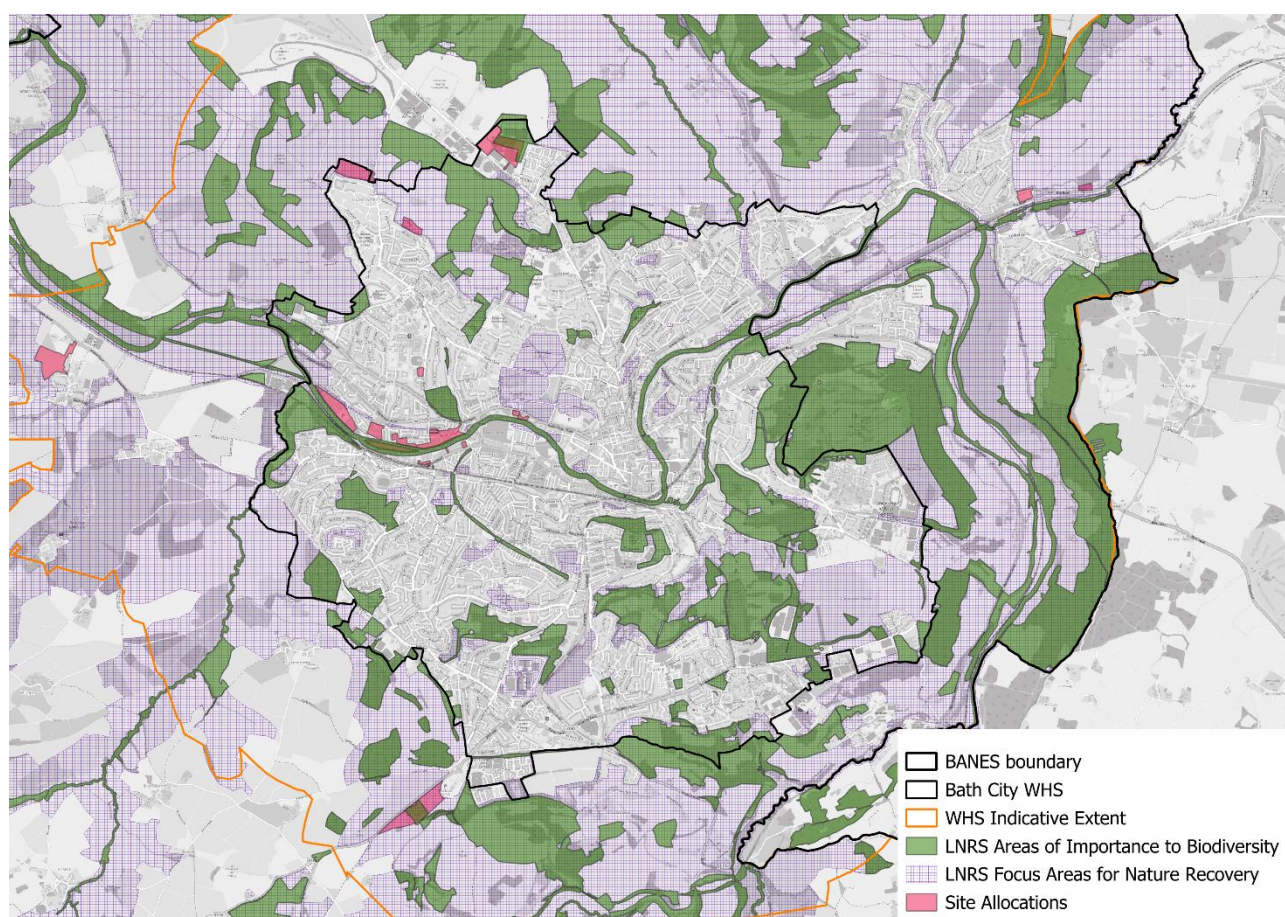


Figure 2.1: Local Nature Recovery Strategy sites in and around Bath.

- 2.7 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.
- 2.8 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, and hybrid commercial development.
- 2.9 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. Bath 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.
- 2.10 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 is robust but might need evolving.
- 2.11 As with other places across the District there is a broad range of evidence that informs policy choices including that referable to: Climate Emergency Strategy & Ecological Emergency Action Plan, the Local Housing Needs Assessment (LHNA), the Economic Needs Assessment, the Movement Strategy for Bath, the Journey to Net Zero Transport Strategy, the Health & Wellbeing Strategy, the Economic Strategy and the Cultural Strategy. Some other strategies are in the process of being commissioned including the Sustainable Tourism and Visitor Accommodation Strategy.

Key Strategic Issues

- 2.12 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 also surrounded by the Green Belt and is bordered by the Cotswold National Landscape on three sides, a National Landscape which is characterised by a highly complex and often very steeply sloping landform.
- 2.13 Whilst these are positive aspects of the city's character, a consequence of these important designations is that there are limited opportunities for the city's outward expansion. As there is not enough land available to meet all of the city's objectively assessed needs, important decisions as to land use priorities need to be made, and one of the key roles of the Local Plan is to prioritise and set out the spatial distribution of different uses within the city.
- 2.14 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 Addendum) identifies that the total requirement for affordable housing, comprised of social rent and low-cost ownership, is very significant and represents 61% of total housing need in Bath based on the Local Plan requirement for 22,000 homes across the District. 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
- 2.15 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.

- 2.16 As above, the two universities bring substantial benefits to the city, but also add to significant city-wide pressures. 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.
- 2.17 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.
- 2.18 The role of green space and nature recovery in supporting, invigorating and enhancing the city is critical to address the ecological emergency and providing easy access to green space for people.
- 2.19 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 these inequalities. Planning for healthy places can help tackle these inequalities by addressing the wider determinants of health such as education, employment, housing, the environment, and access to vital community services and infrastructure.
- 2.20 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.

Key Strategic Objectives

2.21 The objectives for development in Bath are below. It is important to note that whilst many of these can be addressed by policies in the Local Plan, other strategies or initiatives undertaken by the Council or by other stakeholders are also required to ensure that these key priorities can be realised.

- 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 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, keep cool 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, collaborative and engaging strategy for the conservation, enjoyment and understanding of the historic environment, and sustain and enhance the significance of the city's heritage assets including:

- Protect and enhance the OUV of the dual-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 dual-inscribed 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 high-quality and 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 vision 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 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. The Movement Strategy for Bath and Active Travel Masterplan 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

- 2.22 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 carefully to manage the land that is available and 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.
- 2.23 One of the key roles of the Local Plan is to seek sustainably to respond to objectively assessed needs for housing, particularly affordable housing; economic space and other uses.
- 2.24 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 demonstrably to 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).
- 2.25 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.
- 2.26 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 be the key priorities for the Local Plan.
- 2.27 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 (June, 2026) 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 69,000 – 70,000 sqm new office and research and development space (including existing commitments). It also needs to both protect existing industrial floorspace and enable the development of between 35,000 - 41,000 sqm of new industrial (and 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).

- 2.28 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).
- 2.29 Based on population projections the LHNA suggests a projected 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 all required.
- 2.30 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 to ascertain the likely future growth in the number of students. This should then form the basis for considering options and the strategy 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. In addition, the University of Bath is working on a longer-term strategy for the future that, once complete, will inform the next, new-style Local Plan.

Spatial Strategy for Bath

- 2.31 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.
- 2.32 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

- 2.33 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, and needs to be enhanced and properly maintained for the benefit of all users.
- 2.34 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.
- 2.35 The Council will support measures required to unlock the opportunities for utilising empty or underused sites, buildings and spaces throughout the city centre, including spaces above shops. It is a key principle that all space should be in productive use as bringing people to the heart of city would have significant benefits and would help to meet housing and employment needs.
- 2.36 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 and elsewhere.
- A pedestrian-oriented city centre - supported by the Movement Strategy for Bath
- 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 District

- 2.37 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, and 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.
- 2.38 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

- 2.39 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

2.40 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. This can be in the form of changes to the public realm, associated parks and open spaces, and through being supportive of the smaller scale development opportunities.

2.41 The priorities for our neighbourhoods are:

- Supporting 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 optimum densities, typically on vacant or underused sites. 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

2.42 The enhancement and proper management of the city's rich network of green and blue infrastructure is critical to ecological health and to the 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, and the green setting of the city is one of the six key attributes of the City of Bath World Heritage site.

Local Nature Recovery Strategy

2.43 Bath's distinctive topography, characterised by the River Avon corridor and the wooded valleys, hillsides and plateaux that surround and integrate with the city, creates a rich network of interconnected habitats supporting wildlife movement across the urban area and beyond. The city and its hinterland are shaped by a

mosaic of internationally, nationally and locally important ecological assets, which contribute fundamentally to Bath's character, landscape setting and sense of place.

- 2.44 As one of the few places in the world inscribed as a UNESCO World Heritage Site for both its cultural significance and exceptional landscape setting, Bath's natural environment is inseparable from its internationally recognised heritage value and forms a key component of its Outstanding Universal Value.
- 2.45 Within the context of the district-wide Ecological Emergency and the priorities established through the West of England Local Nature Recovery Strategy, Bath presents a particularly sensitive and distinctive environment for growth. Figure 2.1 above demonstrates the relationship between development opportunities and Local Nature Recovery Strategy Focus Areas, highlighting the importance of integrating nature recovery into the design of new development from the outset.
- 2.46 Development within Bath must therefore respond not only to site-specific ecological considerations, but also to its contribution to wider ecological networks, strategic nature recovery objectives and the environmental qualities that define the city and its setting.
- 2.47 A key consideration is the presence of the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC), components of which are located in and around the north-eastern part of the city. The SAC supports internationally important populations of Greater and Lesser Horseshoe Bats and relies upon a connected network of roosts, foraging habitats and commuting corridors extending across the wider landscape.
- 2.48 The River Avon and its associated green infrastructure network form one of Bath's most significant ecological corridors. Designated as a Site of Nature Conservation Importance (SNCI), the river and its riparian habitats provide supporting habitat for SAC bat populations and function as an important route for bat movement, dispersal and foraging throughout the city. The corridor also supports a diverse assemblage of protected and priority species, including otter, beaver, kingfisher and migratory fish species, making it a key component of Bath's wider Nature Recovery Network.
- 2.49 Consequently, the management of artificial lighting and the avoidance of light spill and habitat disturbance are critical considerations for development proposals, particularly where they may affect river corridors, woodland edges, watercourses

and other habitats that contribute to the maintenance of dark, connected flight lines used by bats and ecological connectivity for a wide range of species.

- 2.50 Growth within Bath must therefore protect and enhance this ecological network, maintaining dark corridors, safeguarding key natural features and delivering habitat enhancements that strengthen connectivity between the urban area and the wider landscape. Through the delivery of high-quality green infrastructure, accessible natural and semi-natural greenspaces, and measurable biodiversity enhancements, development should contribute positively to the objectives of the Local Nature Recovery Strategy and the recovery of internationally important bat populations and other priority species. In doing so, development can support nature recovery and climate resilience whilst also conserving and enhancing the landscape qualities that underpin Bath's Outstanding Universal Value.

Bath Transport Strategy

- 2.51 The city faces a unique combination of opportunities and challenges. Whilst Bath remains an attractive place to live, work and visit, its constrained transport network experiences high levels of congestion, traffic-related emissions, severance and pressure on public spaces. These impacts affect quality of life, limit transport choice, reduce network resilience and detract from the city's exceptional historic environment.
- 2.52 The Council's transport strategy for Bath is guided by the Movement Strategy for Bath, the Journey to Net Zero Strategy, the Active Travel Masterplan and the wider West of England Transport Vision. Together, these strategies provide the framework for accommodating planned growth whilst supporting the transition to a low-carbon, healthier and more accessible city. The transport strategy plays a central role in enabling sustainable development, delivering climate objectives and enhancing Bath's special character.
- 2.53 The transport strategy recognises that continued growth cannot be supported through increased highway capacity. Instead, it seeks to improve the range and attractiveness of sustainable travel options, enabling more journeys to be made by walking, wheeling, cycling and public transport whilst ensuring the road network continues to function efficiently for essential trips, servicing, freight and those who rely on private vehicles. This approach supports economic growth whilst reducing

transport emissions, improving air quality and creating more people-focused streets and spaces.

The transport vision for Bath is:

“Bath will enhance its unique status by adopting measures that promote sustainable transport and decision making, whilst reducing carbon dioxide emissions and the intrusion of vehicles, particularly in the historic core. This will improve the quality of life for local people, unlocking sustainable economic growth by improving access to jobs, housing and key destinations across Bath and the wider West of England, while enhancing the city’s unique historic environment.”

2.54 The transport strategy is built around three objectives:

- Create great quality places by improving the public realm, creating greener and healthier streets, enhancing accessibility, and reducing the adverse impacts of traffic on communities and heritage assets.
- Improve travel choices by investing in better walking, wheeling and cycling networks, improving public transport connectivity and reliability, and providing accessible alternatives to private car use.
- Reduce vehicle traffic volumes by managing travel demand, making efficient use of transport interchanges and parking, and encouraging a shift towards sustainable travel for appropriate journeys.

2.55 Delivery of the strategy will focus on creating a connected network of high-quality active travel routes, improved bus services and priority measures on key corridors, enhanced public realm, and a network of transport interchanges and travel hubs. Existing Park and Ride facilities will be developed as wider multi-modal transport interchanges, providing opportunities to transfer between different modes and reducing the number of vehicle trips entering the city centre.

2.56 The strategy promotes a place-based approach to movement, recognising that different streets and routes serve different functions. Within the historic core and neighbourhood areas, priority will be given to walking, wheeling, cycling and the creation of attractive public spaces. On public transport corridors, measures will be introduced to improve bus reliability and journey times. Strategic routes will continue to accommodate essential movement into, out of and through the city whilst supporting more efficient use of limited road space.

- 2.57 The Local Plan supports delivery of the Movement Strategy for Bath by directing growth to locations that can be served by sustainable transport and by requiring development to contribute towards improvements to active travel, public transport, transport hubs and associated infrastructure. New development will be expected to support high levels of walking, wheeling and cycling permeability, provide access to public transport, and incorporate measures that reduce car dependency.
- 2.58 Through the implementation of the spatial and transport strategies, Bath will become a more accessible, healthier and better-connected city. The strategy will support the delivery of new homes and jobs whilst improving public spaces, reducing transport-related emissions, improving air quality, enhancing the experience of residents and visitors, and protecting the outstanding heritage and environmental qualities that make Bath unique.

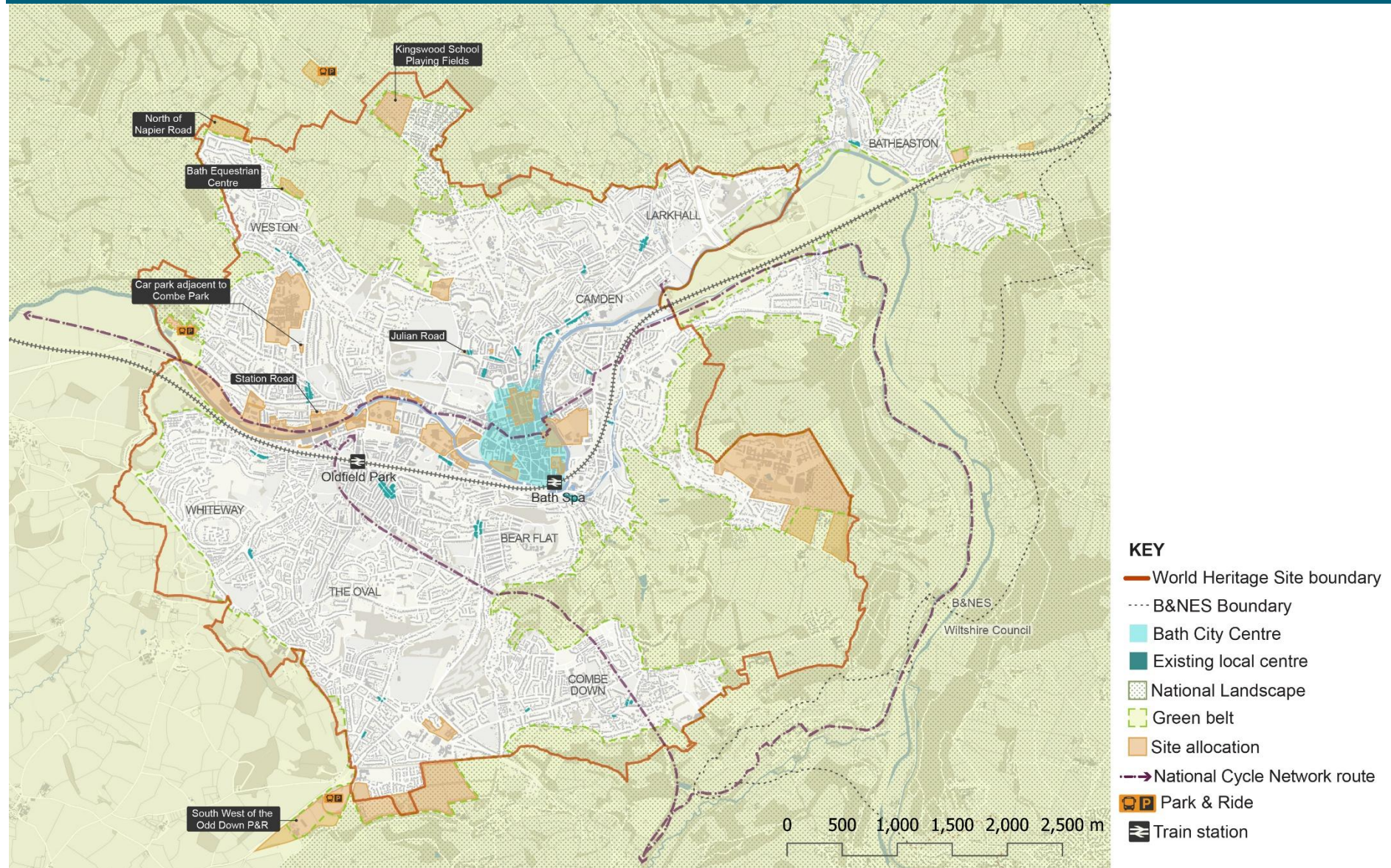


Figure 2.2: Spatial Strategy for Bath

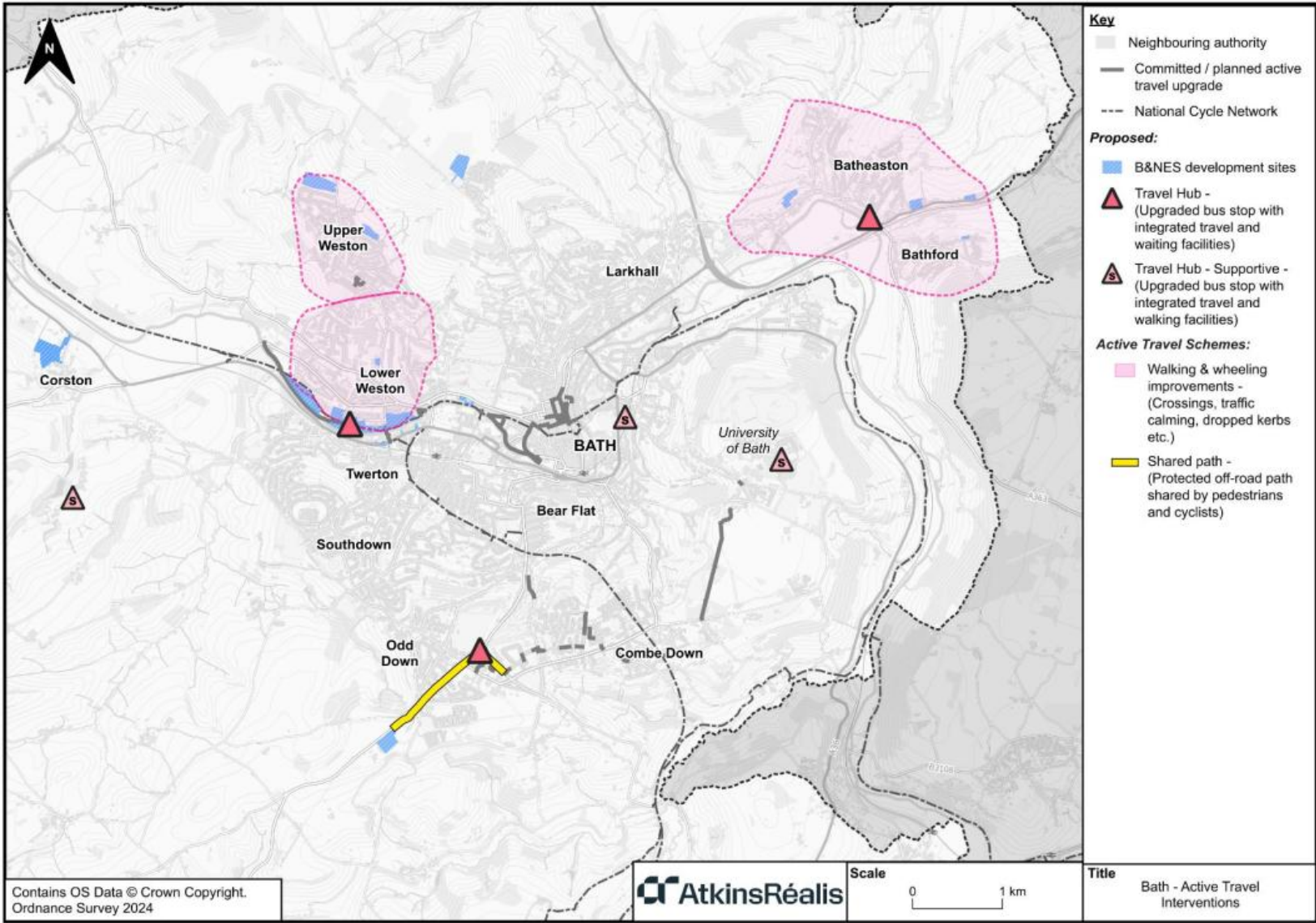


Figure 2.3: Proposed active travel improvements in Bath

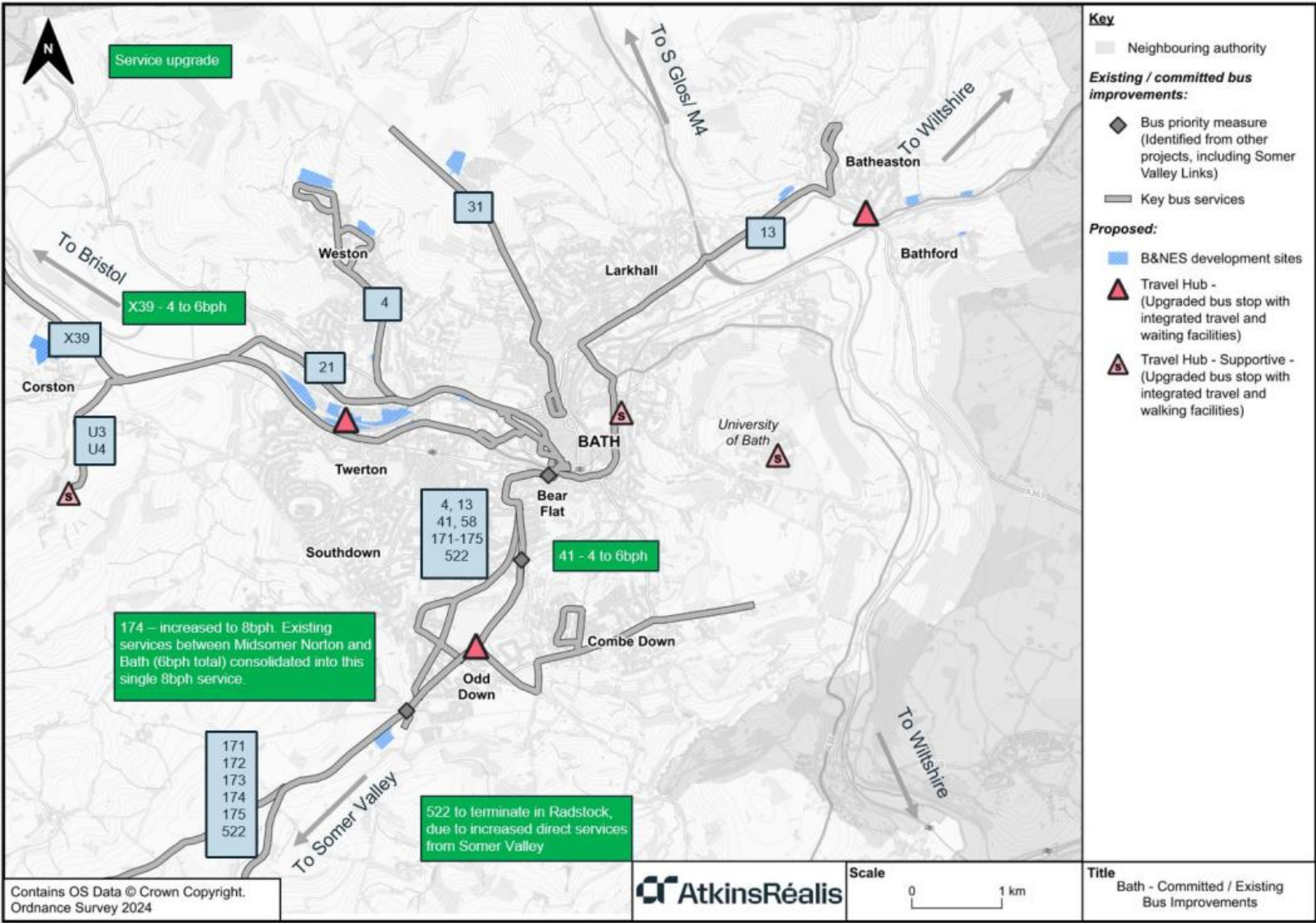


Figure 2.4: Proposed bus services, transport interchanges and travel hubs in Bath

Site Allocations

- 2.59 The remainder of this chapter sets out the site allocations that comprise the strategy for development throughout Bath. Site capacities are expressed as ‘around’ a specified number of dwellings or quantum of employment floorspace. These figures are indicative and are based on the evidence available at the plan-making stage. They are not intended to act as a cap on development. Where proposals demonstrate that a higher number of homes or employment floorspace can be delivered whilst complying with all relevant Local Plan policies, site allocation requirements and standards, a higher site capacity may be supported. The final capacity of each site will be determined through the planning application process, having regard to site-specific circumstances and the need to secure high-quality, sustainable development. Site allocations set out the key development requirements and design principles to ensure that the development outputs contribute towards the creation of great places, optimise the use of land, are properly integrated into and respond appropriately to their sensitive contexts; address the climate and ecological emergencies, and improve health and wellbeing.
- 2.60 In accordance with the 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 is reflected in the ‘Design Values for Bath’ which provide the context for considering the design of new developments in the city and creating authentic and locally distinctive and enduring places. These ‘Design Values’ are to be used 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. Saved Policy BD1 sets out how development proposals need to respond to these design values.
- 2.61 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. A key purpose of the site allocations element of the Local Plan is to demonstrate how different land uses can be delivered, reflecting both evidence and the priorities of the Council.
- 2.62 For all of the site allocations, there is a 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.

- 2.63 The Local Plan allocates larger or significant development sites, and other opportunities for smaller scale or organic redevelopment and change (e.g. garage courts, change in Local Centres, etc) are supported by a positive and enabling policy framework.
- 2.64 To help diversify housing supply by encouraging smaller scale developers and self-builders the Local Plan will support incremental change (given that comprehensive development at a larger scale is often difficult to achieve due to complexities of land ownership) and, to these ends seek to simplify design and development requirements through design codes and guidance. Where appropriate, and in the wider public interest, incremental changes will need to accord with wider spatial framework.
- 2.65 There are also opportunities 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, the Council will explore improving existing housing stock, 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 offers 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).
- 2.66 There are a range of different types of site allocations that are included in the Local Plan, as follows:
- Existing site allocations have been refreshed and refined to reflect updated priorities, to address the climate and nature emergencies and to identify additional opportunities for further development to meet objectively assessed needs. Note – some existing adopted site allocations have not been amended and are therefore, proposed to be saved policies (as referenced below).
 - A more fundamental review of the Newbridge Riverside policy area has been undertaken. 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 continues to protect the

existing floorspace and enables its evolution as an employment area focusing on industrial, advanced engineering, R&D businesses and the Locksbrook Creative Industry Hub. No additional residential or PBSA is permitted as this would undermine other corporate objectives.

- Subject to detailed ecological assessment, a new site is allocated employment purposes to the south-west of the Odd Down Park and Ride, on the southern side of the A367.
- The following sites are allocated as new development sites to contribute towards meeting housing needs:
 - Bath Equestrian Centre
 - Land north of Napier Road
 - Part of Kingswood School Playing Fields
 - Site on Combe Park
 - Station Road
 - Julian Road (rear of St James's Square).

Milsom Quarter:

2.67 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, 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. 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.

For information, see saved policies:

SB1: WALCOT STREET / CATTLEMARKET SITE

SB2: CENTRAL RIVERSIDE & RECREATION GROUND

SB3: MANVERS STREET

Bath Quays North & Bath College

Context

- 2.68 Lying immediately to the south-west of the city centre, just outside the former city walls and a few minutes' walk away from the city's main railway station, this prime development area represents a significant opportunity to provide an expanded city centre to meet the demands of a growing city. It is partly occupied by Bath College and overlooks the former wharf buildings, with the striking backdrop of Beechen Cliff. Its river frontage has been significantly remodelled to provide a new public space adjacent to the river, a new pedestrian and cycling bridge over to Bath Quays South; and flood mitigation that allows these sites to be brought forward for development.
- 2.69 As a result of its history, it is an area that feels fragmented and cut off from the city's core. With the exception of its rejuvenated riverside environment, it currently fails to make the most of its assets and contributes negatively to the character of the Conservation Area and to this part of the World Heritage Site.

Bath Quays North

- 2.70 The redevelopment of this site is one of the Council's flagship regeneration projects and is a key part of the Bath Riverside Innovation District (BRID), 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.
- 2.71 Outline consent was granted in April 2019 for a comprehensive mixed-use development with a combined floorspace of up to 38,000sqm. The delivery of the whole site has not progressed but plots 6 and 7 from the consented scheme are anticipated to be developed for residential purposes in the near future.
- 2.72 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 upon securing an anchor tenant, and this is seen as the catalyst for further investment on adjacent sites, and to help revive Bath's economic performance.

- 2.73 The proximity of the site to the rail station, and its riverside and city centre location - with the facilities and amenities that this provides - are key assets which contribute towards site's appeal. A new pedestrian and cyclist bridge has now been delivered which significantly improves pedestrian and cyclist movement between the site, and the regeneration opportunities and neighbouring communities south of the river.

Bath College

- 2.74 Bath College plays a vital role as the principal provider of further and technical education in B&NES and the College is central to delivering the Local Skills Improvement Plan priorities in health, care, creative industries, construction, engineering, and digital technologies.
- 2.75 The College is a key anchor institution within B&NES, collaborating with schools, universities, employers, the NHS, and the Council to tackle skills gaps and drive inclusive growth. The College's partnerships with anchor employers – such as hospitals, engineering firms, and hospitality groups – underpin curriculum co-design, work experience opportunities, and knowledge exchange.
- 2.76 It's central location within Bath and its close proximity to the bus and rail station means that it is accessible to a wide section of the local population.
- 2.77 Redevelopment will deliver a new mixed-use quarter that connects the heart of the city to a vibrant and remodelled riverside environment. Whilst respecting the sensitivity of its wider urban context, its proximity to the city centre, its backdrop and south facing orientation make this one of the most exciting riverside regeneration opportunities in the region.
- 2.78 A key requirement for this wider area is for it to be stitched back into the city centre; repairing its damaged urban grain. It will form part of an expanded city centre with the social, cultural and economic activity and ambience that this entails. It will provide a pedestrian dominant environment that connects the city centre directly through to the riverside edge and beyond to the surrounding communities via the new pedestrian and cycling bridge. To achieve this effectively requires skilful place shaping and partnership working with adjoining landowners, notably Bath College, so as to create the conditions for its regeneration and its successful operation as part of an expanded centre.

- 2.79 It is anticipated that those parts of the Bath College site which are not required for educational purposes could come forward for development during the Plan period, providing the opportunity to deliver up to 9,000sqm (GIA) of mixed-use floorspace related principally to employment and residential, with the potential of other city centre type uses of part of the ground floors and an expanded city centre. Redevelopment of the College's car park and the existing single storey element of their site will enable the provision of the key pedestrian route through the site that connects the city centre to the Bath Quays North site and the remodelled riverside.
- 2.80 The provision of new buildings on the Bath College site will not only assist in meeting development needs but will also help to repair the part of the city's urban fabric. It will do this by:
- a) Addressing the negative impact on the city's townscape of some of the existing buildings;
 - b) Improving the quality of important views over the site;
 - c) Helping to physically assimilate the college campus into the city centre; and
 - d) Improving the quality of connections through to Bath Quays North, the riverside and beyond.

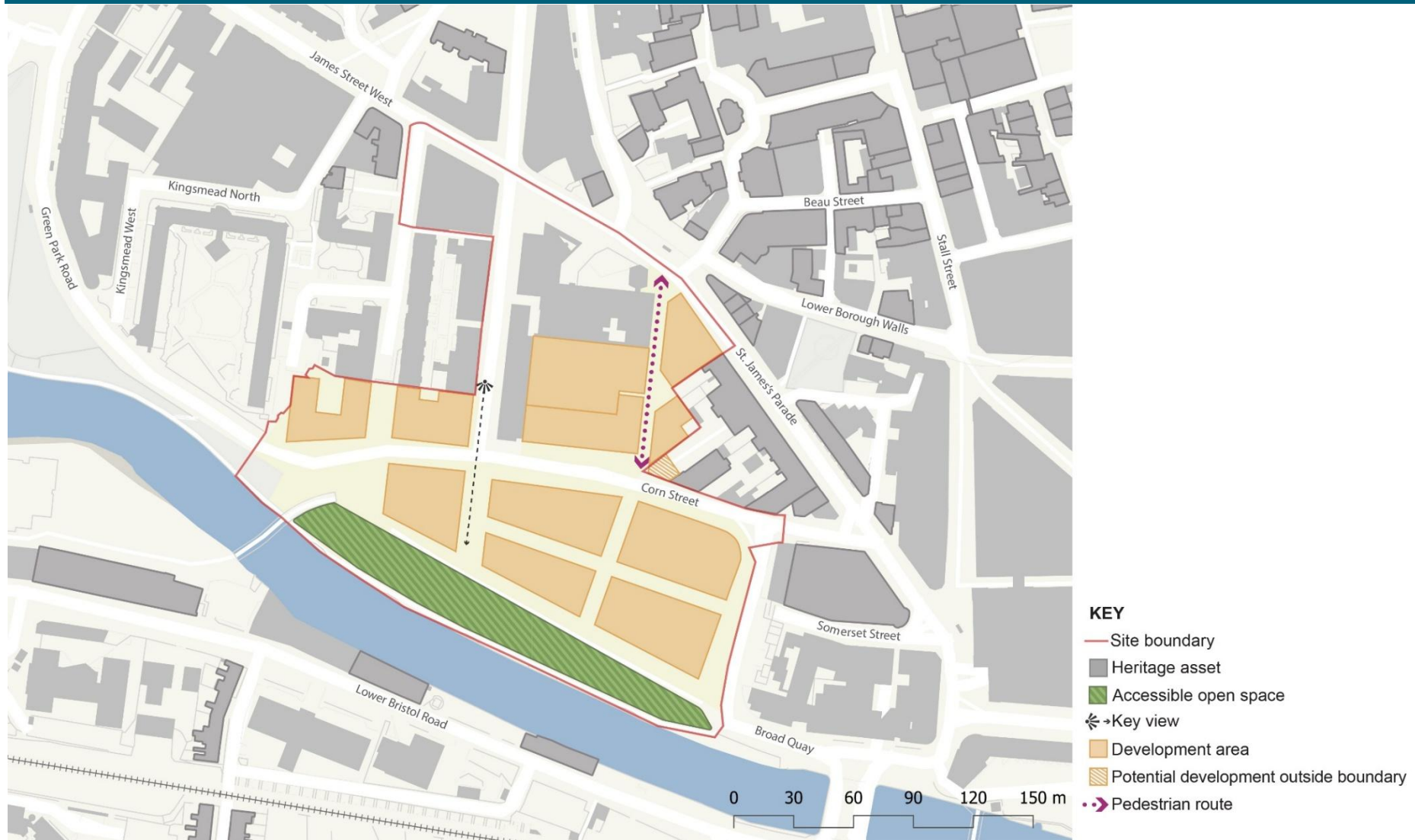


Figure 2.5: Bath Quays North & Bath College. This diagram is illustrative. It supports the site allocation policy text, illustrating how site requirements could be achieved.

POLICY 2.1: Bath Quays North & Bath College

Development Requirements and Design Principles

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

1. On the Bath Quays North site, deliver an employment led mixed-use development that contributes positively to the vibrant character of the city centre. Development proposals are expected to deliver around 38,000 sq.m. (GIA) of new floorspace which will contribute towards delivering the city's need for additional employment floorspace and residential uses in particular. A minimum of 20,000 sq.m. gross of office floorspace (Class E (g)(i)) is to be provided across the allocated site, and this can include an element of hybrid business space to enable start up business and research and development uses (Class E (g)(ii)). A minimum of 70 residential units are to be provided. Student accommodation or PBSA on this site is not acceptable as it will impede the delivery of other Council objectives.
2. Other complementary uses such as retailing and below ground car parking will in principle be supported subject to their positive response to other relevant policies within the development plan.
3. The existing Bath College floorspace is protected for educational purposes, although opportunities to reconfigure and improve the quality of this provision are supported. Should it be demonstrated that parts of the site are no longer required for educational or related purposes or that opportunities for intensification of the site are identified, then mixed-use development, subject to conformity with other policies of the Local Plan, is supported. This is anticipated to deliver:
 - a) Around 60 residential flats. Student accommodation or PBSA on this site is not acceptable as it will impede the delivery of other Council objectives; and
 - b) Around 4,500sqm of employment floorspace (within Class E). This is to include active uses on the ground floor of the key route through the site.
4. On both the BQN and the Bath College sites, deliver 20% affordable housing on-site, subject to viability and with a tenure split as set out in Policy 6.13

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

- a) Responds positively to the existing, varied architectural character of adjacent sites; and
 - b) Responds to the valued characteristics of the city centre, and to the wider context of Bath as a World Heritage Site as expressed through its Outstanding Universal Value.
11. Development should not detract from important views over the site and should respond appropriately to the general characteristics of buildings heights within the city. An analysis is required to enable an appropriate response, and to influence the height, massing and design of buildings. The Bath Building Heights Strategy should be used as part of the evidence base and the starting-point for this analysis. This identifies this site as being within zone 1 – the Georgian City, and recommends that for new development ‘the overall height should not be less than or exceed the overall prevailing height of nearby Georgian buildings.’ The nearest Georgian buildings are located on St James’s Parade and at Green Park. Note that this is a recommendation for the general height only and is subject to modifiers.
12. The design of the development, in particular its roofscape must be sensitive and responsive to its prominence when seen from Beechen Cliff and from other surrounding hillsides, including during hours of darkness. There are opportunities for roofs to be used for rainwater storage and capture, for solar cooling, power and for edible gardening, and this mix of functions can help to reduce a monolithic appearance.
13. The creation of an enhanced riverside environment associated with the implementation of flood conveyance measures provides the context and the opportunity for development to make this into a key city centre destination. Imaginative responses that integrate, and contrast, the qualities of the natural environment with the built should be proposed, including opportunities to enhance biodiversity habitats and connections by linking the riverbank and flood defence scheme with Green Park.
14. The light spill from buildings and associated public realm will be designed to enable the retention of a dark river-based corridor for commuting and foraging bats.

15. Car parking – assess the number of public car parking spaces to be retained on the site as part of a wider assessment of parking supply and demand. The assessment should support the vitality of the City Centre economy while enabling a reduction in public parking provision where appropriate, encourage modal shift, reduce vehicular traffic and accord with the Council's transport strategy.
16. Cycling – each individual development block should provide well designed, secure, convenient and easy to access cycle parking and storage for the use of their occupants
17. The redevelopment of this site requires the current coach parking and drop off facility to be provided in an alternative location. Should this not prove possible, then a coach drop off area will need to be provided as either an interim measure, or as part of the redevelopment of the wider area.
18. The finished floor levels of development will need to be raised to above safe flooding levels taking into account the vulnerability classification informed by site-specific FRAs. This will require careful design solutions to maintain appropriate relationships between buildings and the adjacent public realm.
19. Undertake a detailed historic environment assessment, and where necessary evaluation, in order to identify and implement appropriate mitigation.

Delivery and Implementation

20. In formulating plans for development, adjoining landowners, developers or promoters are expected to work collaboratively to ensure that the development of their sites is complementary.
21. Given the sensitive heritage and landscape context, and the potential requirement to integrate parcels in multiple ownerships, development proposals shall be subject to independent design review prior to submission.

For information, see saved policies:

SB5: SOUTH QUAYS & RIVERSIDE COURT

SB6: SOUTH BANK

Green Park Station West & Sydenham Park

Context

This area comprises:

Green Park Station West (Policy 2.2A):

- Green Park Station, the units facing James Street West,
- Sainsbury's

Sydenham Park (Policy 2.2B):

- Bath Riverside East: Homebase, its car park and overflow Sainsbury car park
- Pinesway: Pinesgate offices and the associated road gyratory
- Pinesway Industrial Estate
- Sainsbury's Petrol Filling Station

2.81 This is a complex area, with a variety of site ownerships, leases and a diversity of uses. Due to this complexity, it is anticipated that delivery will be undertaken in a phased or piecemeal manner, with different landowners bringing forward development at different times, as and when their sites become available. However, to avoid the delivery of sub-optimal outcomes that do not deliver on the wider opportunities in the area, it is crucial for the Local Plan to provide the overarching spatial framework within which these individual developments can be delivered. This framework is acknowledged as needing to be flexible enough to respond to changing circumstances, yet it also needs to be robust enough to ensure that successful development can be delivered.

2.82 Developers and landowners are required to ensure that their individual development phases contribute positively to the delivery of this spatial framework and enable the vision for the wider area to be achieved. Landowners will need to work jointly to enable delivery, and to undertake a Masterplan as appropriate.

2.83 Planning permission was granted in November 2025 for the redevelopment of the former Homebase site to provide a mixed-use development comprising 275 build-to-rent dwellings, 179 Shared Living Units, 1,126sqm of flexible retail and/or office floorspace, and public realm, landscaping and associated works.

2.84 In addition, significant refurbishments and retrofit works have recently been undertaken to Pinesgate West to introduce energy efficiency measures and to

revitalise its facade improve its thermal performance. The creation of the new façade presents a new confident aesthetic for the site and this should help to encourage further investment, including the potential for a new building in the centre of the site.

Vision

- 2.85 The wider area represents an exciting opportunity to create a new city destination, with a mix of uses and events that responds to the bold architectural presence of Green Park Station; a new city quarter that complements the new residential development of Bath Riverside and represents a confident new stage in the evolution of the city; a place that delivers zero carbon development, with integrated green infrastructure, a vibrant community of varied businesses, and an extension of a riverside residential environment. It is a location that would benefit from a clear identity and point of differentiation, one with a strongly defined built environment that responds creatively yet sensitively to the broader context of the World Heritage Site.
- 2.86 Additional development opportunities have been identified within the Sydenham Park allocation that if delivered would assist in optimising development capacity in this area, contribute towards meeting the need for more residential and employment floorspace and provide the opportunity to improve the quality of the townscape in this area. These potential opportunities have not been discussed with landowners at this stage and the Local Plan is not reliant on them being delivered within the Plan period, however such windfall sites could come forward at some point, and it is prudent for the Local Plan to provide a policy framework should they come forward for development. These potential opportunities are as follows:
- The potential redevelopment of the Pinesway Industrial Estate with the retention of the same sqm of employment space as existing and the appropriate utilisation of the airspace above.
 - The possible insertion of an additional employment building to be provided in the centre of the Pinesgate site, currently used for car parking.
 - The potential redevelopment of the Sainsbury's Petrol Filling Station to utilise the airspace above.

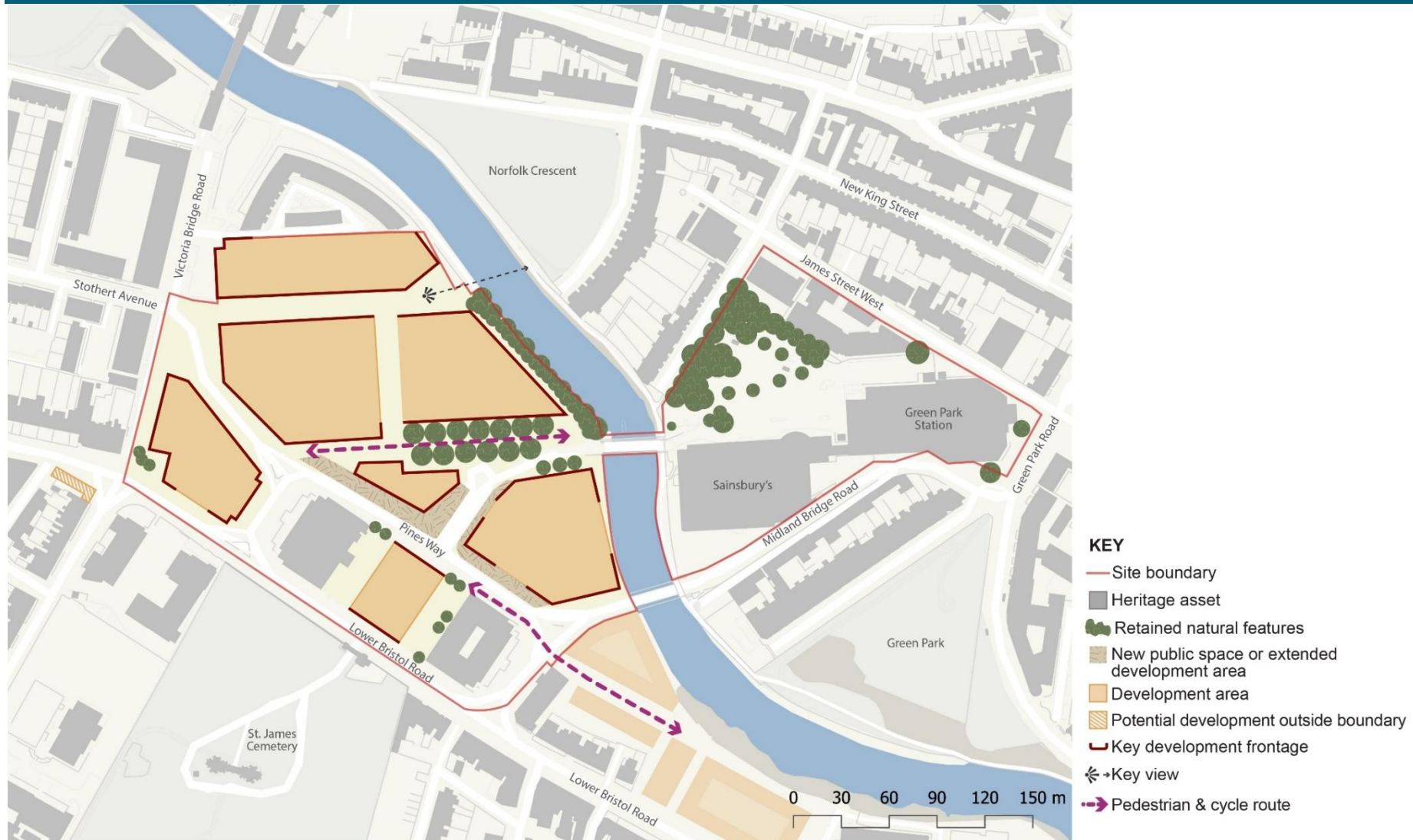


Figure 2.6: Green Park Station (A) And Sydenham Park(B) Sites. This diagram is illustrative. It supports the site allocation policy text, illustrating how site requirements could be achieved.

POLICY 2.2: Green Park Station (A) And Sydenham Park(B) Sites

Development Requirement and Design Principles that apply to the whole site of Green Park Station West (A) and Sydenham Park (B)

1. Mixed-use development comprising employment, residential and retail uses as set out below in greater detail.
2. Deliver 20% affordable housing on-site, subject to viability and with a tenure split as set out in Policy 6.13.
3. Responding to strategic viewpoints into and across the sites and to the character and sensitivity of valued assets within the World Heritage Site, this area has a significant opportunity to provide a distinct and contrasting built character to the city centre. This includes the potential of introducing different building forms or typologies, and different building materials that can respond to the visual homogeneity of the city.
4. Sydenham Park Street will be the central public realm feature of the new development, as highlighted on the concept diagram. It is required to perform a number of functions that with careful and clever design can co-exist:
 - a) It will be a key green infrastructure corridor within the area, connecting directly through from Green Park Station through the existing avenue of trees at its western end, to connect with the junction at or related to Brougham Hayes.
 - b) It will serve as a safe and high-quality pedestrian and cycle route, to include an improved and safer junction with Brougham Hayes.
 - c) It will also be designed to act as a potential public transport corridor, providing a direct and preferential public transport route through the site to Green Park Road.
 - d) It will be required to maintain vehicular access to Sainsbury's (assuming it stays in its current location).
 - e) Development will need to present an active frontage at ground floor level to create an attractive, interesting and safer environment. Development should respect and be subservient to the architectural presence of Green Park Station.

5. In order to facilitate pedestrian and cyclist movement, streets and spaces must be designed and orientated to provide safe and direct links through the site, as indicated on the concept diagram.
6. The design of the public realm within this area should be informed by the Bath Pattern Book and by the agreed public realm typologies implemented at Bath Western Riverside. Improvements to the public realm are to be undertaken by the respective developers as an integral part of their development schemes.
7. The river corridor should be treated as a key component of the area, creating a destination and providing public access and activity along the riverbank and at key points along it. The trees along the riverbank should be retained and enhanced, as appropriate, to strengthen and reinforce its biodiversity and landscape value, and its role as a vital part of the city's green infrastructure. A biodiversity study must be commissioned to inform the development of the site, and to resolve any potential tension between the design details of public access and habitats for bats.
8. Lighting at this location must be designed to safeguard the important ecological function of the river corridor, to include the retention of a dark corridor for bats.
9. The provision of a green infrastructure corridor that is aligned between Norfolk Crescent Green and the entrance to St James's Cemetery, as indicated on the concept diagram, is encouraged.
10. The sequential approach to site layout is required to be informed by a site-specific Flood Risk Assessment (FRA). As minimum, the floor levels have to be raised at the appropriate level taking into account the vulnerability classification informed by the FRA.
11. Undertake a detailed historic environment assessment, and where necessary evaluation, in order to identify and implement appropriate mitigation.

Green Park Station area (A)

It is not anticipated that Sainsbury's will vacate from their current site and it is highly likely that they will continue to require the surface level car park adjacent to their store. However, opportunities to remove the surface level car parking from underneath and in the vicinity of the canopy of Green Park Station would be strongly supported. This would provide opportunities to introduce more vibrant and active uses such as an

expanded programme of temporary events and activities, or the construction of temporary pods that could house specialist and small-scale employment, retail or market activities.

Sydenham Park (B)

In order to ensure that the broader benefits are achieved, each part of the Sydenham Park site will be expected to contribute to, help deliver and respond to the spatial framework as illustrated in the concept diagram. The affected landowners will need work jointly to enable delivery, and to undertake a Masterplan as appropriate.

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

Development Requirement and Design Principles that apply to Sydenham Park (B) area

12. Focused on Sydenham Park Street, this area will be designed as a pedestrian and cyclist friendly environment, facilitating easy, safe and comfortable movement through the area. This is not to preclude vehicular access to serve the existing or relocated supermarket, other development blocks, or the potential provision of public transport.
13. Active uses are expected adjacent to Sydenham Park Street.
14. The height and position of new buildings must preserve the view corridor to Green Park Station, which should remain dominant in views and height to new development.
15. Development should not detract from important views over the site and should respond appropriately to the general characteristics of buildings heights within the

city. An analysis is required to enable an appropriate response, and to influence the height, massing and design of buildings. The Bath Building Heights Strategy should be used as part of the evidence base and the starting-point for this analysis. This identifies this site as being within zone 3 – the Valley Floor, and recommends that for new development ‘building shoulder height should be 4 storeys. One additional setback storey within the roofscape is likely to be acceptable’. Note that this is a recommendation for the general height only and is subject to modifiers.

16. There should be a clearly defined frontage to the Lower Bristol Road.
17. Development proposals are required to provide a positive frontage to the Pinesway gyratory and implement improvements to the public realm to deliver a more pedestrian and cycle friendly environment. The gyratory is an important part of the highway network, and its existing vehicular capacity is likely to need to be maintained.
18. The sequential approach to site layout is required to be informed by a site-specific FRA. As a minimum, the floor levels have to be raised at the appropriate level taking into account the vulnerability classification informed by the FRA. Provide conveyancing provision to mitigate impact either on site or through other appropriate improvements such as to Twerton Gate.

Other Development Opportunities

Pinesway Industrial Estate

19. The Pinesway Industrial Estate provides important trade counter floorspace that supports the city’s economy. Redevelopment of the site is supported in principle subject to the retention of the same sqm of employment space as existing and the appropriate utilisation of the airspace above that contributes towards meeting the need for more residential and employment floorspace. Purpose built student accommodation in this area is not acceptable as this would impede the delivery other Council objectives.

Pinesgate

20. Given the recent refurbishment works that have taken place to Pinesgate West it is considered very unlikely that a comprehensive redevelopment of the entire site will take place over the Plan period. Instead, similar refurbishment works could

take place to Pinesgate East to improve its energy efficiency, thermal performance and aesthetics, and these are supported.

21. In addition, it is considered that there is potential for an additional office building to be provided in the centre of the space currently used a car park. As well as providing employment floorspace, such an intervention in this location could, subject to a comprehensive reconsideration of traffic movements and access requirements around the current gyratory, act as a further catalyst to transform the character and identity of this part of the city and create a high quality, people focussed environment. Purpose built student accommodation in this area is not acceptable as this would impede the delivery other Council objectives.
22. The principle of this would be supported subject to compliance with the following as well as other relevant policies within the plan:
 - a) transform the quality of the public realm and the relationship of Pinesgate to the Sydenham Park area, including the planting of large species trees;
 - b) provide a positive building frontage to Pinesway and the A36;
 - c) Provide a north south pedestrian route through the site to improve permeability; and
 - d) significantly improve the quality of pedestrian and cycling routes through the wider area.

Sainsbury's Petrol Filling Station

23. Whilst there are no known plans for the redevelopment of this site, there is a theoretical potential for a new development that utilises the airspace and provide more productive floorspace, improve the quality of townscape and the relationship of development to the public realm. Subject to compliance with relevant policies within the plan, such a proposal will be supported in principle. Purpose built student accommodation in this area is not acceptable as this would impede the delivery other Council objectives.

Delivery and Implementation

24. In formulating plans for development, adjoining landowners, developers or promoters are expected to work collaboratively to ensure that the development of their sites is complementary.

25. Given the sensitive heritage and landscape context, and the requirement to integrate parcels in multiple ownerships, development proposals shall be subject to independent design review prior to submission.

For information, see saved Policy SB8: BATH RIVERSIDE

North Bank, Bath Riverside

- 2.87 This policy supplements the Bath Riverside saved policy SB8 and provides clarification on the requirements should these opportunity sites come forward in the Plan period. Many of these sites contain important community or employment floorspace and given the evidence demonstrating the high demand and lack of supply, it is a requirement that this floorspace is retained or re-provided in any redevelopment of these sites.
- 2.88 The Local Plan is not relying on these sites to come forward in the plan period and they have not all been promoted by their landowners or other parties, nevertheless they are included in the Local Plan to provide a positive planning policy framework enabling mixed use residential and commercial development should circumstances change and development proposals emerge.

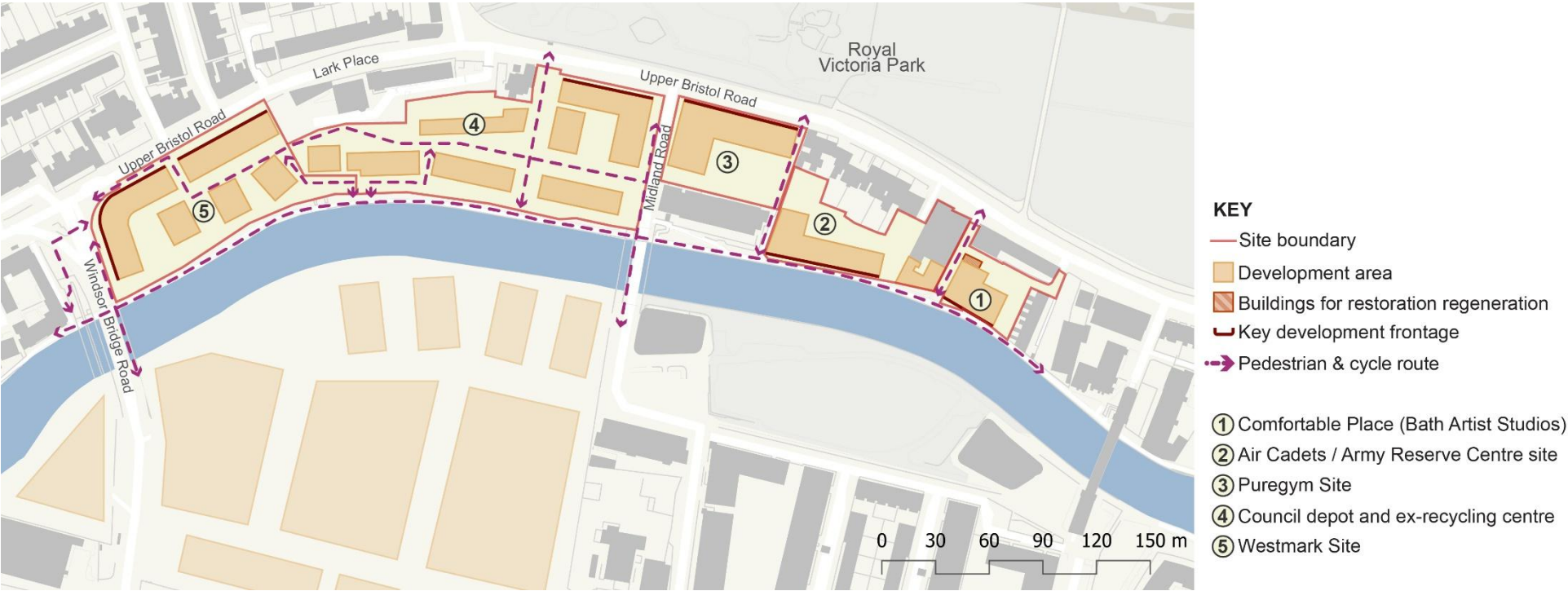


Figure 2.7: North Bank, Bath Riverside. This diagram is illustrative. It supports the site allocation policy text, illustrating how site requirements could be achieved.

Policy 2.3: North Bank, Bath Riverside

This policy supplements saved Policy SB8.

COMFORTABLE PLACE

This site has been used by Bath Artists Studios for a considerable period of time and is an invaluable resource for the city. Whilst the site has recognised potential for redevelopment, it will be a requirement that:

1. The existing quantum of commercial floorspace is retained
2. Residential floorspace on the upper floors. Purpose-Built Student Accommodation (PBSA) will not be permitted.
3. 20% affordable housing on-site, subject to viability and with a tenure split as set out in Policy 6.13, will be delivered.
4. A positive relationship to the river edge is achieved, and
5. Improve the quality of the existing pedestrian route between the riverside and Upper Bristol Road.

AIR CADETS/ARMY RESERVE CENTRE

There has been no indication that this site would be available for redevelopment or reuse over the Plan period, but should it come forward then the following is required:

6. An assessment of the opportunities to reuse and retain the existing buildings and of their heritage value
7. The retention of the existing quantum of commercial floorspace
8. Residential uses on the upper floors. Purpose-Built Student Accommodation (PBSA) will not be permitted.
9. 20% affordable housing on-site, subject to viability and with a tenure split as set out in Policy 6.13, will be delivered.
10. A positive relationship to the river edge
11. Respond to the site's location within SAC Bat consultation zones (Greater Horseshoe Bat A; Lesser Horseshoe Bat C) including careful consideration of lighting to sustain key commuting routes for SAC bat populations.

PUREGYM SITE

There has been no indication that this site would be available for redevelopment over the Plan period, but should it come forward then the following is required:

12. The retention of the existing quantum of commercial floorspace
13. Residential uses on the upper floors. Purpose-Built Student Accommodation (PBSA) will not be permitted.
14. 20% affordable housing on-site, subject to viability and with a tenure split as set out in Policy 6.13, will be delivered.
15. A positive relationship to the Upper Bristol Road and Midland Road
16. Respond to the site's location within SAC Bat consultation zones (Greater Horseshoe Bat A; Lesser Horseshoe Bat B) including careful consideration of lighting to sustain key commuting routes for SAC bat populations.

COUNCIL DEPOT AND FORMER RECYCLING CENTRE

This site has planning permission for the erection of 176 dwellings and works have commenced.

WESTMARK SITE

This site is on a prominent corner of Upper Bristol Road and Windsor Bridge Road and has largely been vacant for a considerable period of time. Its redevelopment is strongly supported subject to the following requirements:

17. The retention of the existing quantum of commercial floorspace
18. Residential uses on the upper floors. Purpose-Built Student Accommodation (PBSA) will not be permitted.
19. 20% affordable housing on-site, subject to viability and with a tenure split as set out in Policy 6.13, will be delivered.
20. A high-quality scheme with well-defined and positive frontage to Upper Bristol Road and Windsor Bridge Road to enhance this key entrance into the city.
21. A positive relationship to the river edge is achieved.
22. The creation of pedestrian connections through the site to connect the surrounding routes to the riverside.

Delivery and Implementation

23. In formulating plans for development, adjoining landowners, developers or promoters are expected to work collaboratively to ensure that the development of their sites is complementary.
24. Given the sensitive heritage and landscape context, and the potential requirement to integrate parcels in multiple ownerships, development proposals shall be subject to independent design review prior to submission.

Twerton Riverside

Twerton Riverside, located to the south of the river, was originally intended to be a location where a broader range of uses could be developed, including new business premises, but instead the area has changed significantly and now comprises of a range of schemes including Roseberry Place, which provides homes for rent, the Mero Retail Park which is anchored by Lidl, the Weston Lock Retail Park, and a range of Purpose-Built Student Accommodation (PBSA) developments. The Roseberry Place scheme was initially consented to deliver a mixed-use scheme comprising residential and business floorspace, but this latter element has not come forward, despite evidence demonstrating its need.

There are still a number of important, but smaller scale opportunities within the Twerton Riverside area that, once delivered, will help to improve the townscape and frontage to the Lower Bristol Road and Windsor Bridge Road, enhancing their role as key routes into the city. These development sites will be limited to general housing or employment to contribute towards meeting the objectively assessed needs. The quantum of existing employment floorspace on these sites is protected and would need to be re-provided as a minimum in any redevelopment. PBSA or co-living will not be acceptable.

Key Development Opportunities

2.89 Key regeneration opportunities include:

- The Stable Yard Industrial Estate
- The remaining land parcel at Roseberry Place
- The cluster of smaller development sites on the frontage of Lower Bristol Road which have been identified as having the potential to come forward at some point in the future.

2.90 These sites are allocated in the Local Plan and are subject to site-specific development requirements and design principles.

Stable Yard Industrial Estate

- 2.91 This site is located to the west of Windsor Bridge Road, bordered by the river on its north-western edge, and to the north of the proposed sustainable transport route which will eventually use the former Locksbrook Railway Bridge.
- 2.92 This site currently performs an important economic function, is well occupied and contributes towards meeting an identified need for employment floorspace. The Local Plan is not relying on this site to come forward in the plan period, nevertheless it is included in the Local Plan to provide a positive planning policy framework should circumstances change and development proposals emerge.



Figure 2.8: Stable Yard Industrial Estate. This diagram is illustrative. It supports the site allocation policy text, illustrating how site requirements could be achieved.

Policy 2.4: Stable Yard Industrial Estate

The site has recognised potential for redevelopment and any proposals will be expected to deliver:

1. The reprovision of the existing quantum of commercial floorspace in any redevelopment of the site.
2. Residential or employment floorspace on the upper floors. Purpose-Built Student Accommodation (PBSA) will not be permitted.
3. 20% affordable housing on-site, subject to viability and with a tenure split as set out in Policy 6.13.
4. A high-quality scheme with a positive relationship to the river edge and a well-defined and positive frontage to Windsor Bridge Road that enhances this key and prominent location.
5. Buildings respond positively to the important views over the site and the valued character of the area. An analysis is required to enable an appropriate response, and to influence the height, massing and design of buildings. The Bath Building Heights Strategy should be used as part of the evidence base and the starting point for this analysis. This identifies this site as being within zone 3 – the Valley Floor, and recommends that for new development ‘building shoulder height should be 4 storeys. One additional setback storey within the roofscape is likely to be acceptable’. Note that this is a recommendation for the general height only and is subject to modifiers.
6. Measures that enhance green infrastructure and protect biodiversity interests are implemented. Such measures must safeguard the value of the site and the adjacent river corridor and should take into account the potential of extending green infrastructure networks, including measures to restore and enhance the biodiversity value of the river and the river edge. It is a requirement for a biodiversity study to be commissioned to inform the development of the site.
7. Lighting at this location must be designed to safeguard the important ecological function of the river corridor, to include the retention of a dark corridor for bats.
8. Flexible and robust building forms that enable changes of use over time.

9. An appropriate response to the character and context of the area, responding to its mixed-use character whilst respecting the homogenous character of the city.
10. The development must provide cycle parking and storage that is covered, secure, convenient, easy to access and well designed.
11. The sequential approach to site layout is required informed by a site-specific FRA. As minimum, the floor levels have to be raised at the appropriate level taking into account the vulnerability classification informed by the FRA.
12. Undertake a detailed historic environment assessment, and where necessary evaluation, in order to identify and implement appropriate mitigation.

Delivery and Implementation

13. Given the sensitive heritage and landscape context development proposals shall be subject to independent design review prior to submission.

Roseberry Place

Context

- 2.93 The site, with an area of approximately 4,270 sqm, lies on the north side of Lower Bristol Road, at the western corner of the Roseberry Place site and is currently used as a temporary fire station. It is in a prominent location fronting onto the Lower Bristol Road, a key route into the city.
- 2.94 Planning permission was granted in 2016 for a mixed-use regeneration comprising of six buildings to accommodate up to 175 flats, flexible business employment floorspace (Use Class B1) (up to 4,500 sq m gross), local needs shopping (up to 1,350 sq m gross).’ The residential and retail elements have been completed, but the employment element has not progressed despite long periods of marketing.

Vision

- 2.95 The remaining part of the original site allocation is at a key location and development here needs to provide a positive frontage to the street and reinforce the role of this key route into the city.
- 2.96 It is accepted that the site has been marketed for a reasonable period of time for an office building and it has been demonstrated that at this time there is no commercial interest in the site for that purpose.
- 2.97 In addition to the need for the Local Plan to meet general housing needs, evidence also clearly demonstrates that there is a substantial unmet demand for employment floorspace. A more flexible approach in terms of the permitted land uses is therefore considered appropriate, but one that still strives to address the land use needs of the city.



Figure 2.9: Roseberry Place. This diagram is illustrative. It supports the site allocation policy text, illustrating how site requirements could be achieved.

POLICY 2.5: Roseberry Place

Development Requirements and Design Principles

Development proposals will be expected to deliver:

1. A mixed-use scheme that delivers residential accommodation that meet general housing needs and a minimum of 1,000 sqm of flexible Class E(g) floorspace. In addition, other complementary uses such as retail will be permitted where these do not adversely impact on existing retail centres. Purpose-Built student accommodation in this area is not acceptable as this would impede the delivery other Council objectives.
2. 20% affordable housing on-site, subject to viability and with a tenure split as set out in Policy 6.13.
3. A high-quality scheme with well-defined and positive frontage to Lower Bristol Road to enhance this key entrance into the city.
4. Buildings that respond positively to the important views over the site and the valued character of the area. An analysis is required to enable an appropriate response, and to influence the height, massing and design of buildings. The Bath Building Heights Strategy should be used as part of the evidence base and the starting point for this analysis. This identifies this site as being within zone 3 – the Valley Floor, and recommends that for new development ‘building shoulder height should be 4 storeys. One additional setback storey within the roofscape is likely to be acceptable’. Note that this is a recommendation for the general height only and is subject to modifiers.
5. Measures that enhance green infrastructure and protect biodiversity interests are required. Such measures must safeguard the value of the site and the adjacent river corridor and should take into account the potential of extending green infrastructure networks, including measures to restore and enhance the biodiversity value of the river and the river edge. It is a requirement for a biodiversity study to be commissioned to inform the development of the site.
6. Respond to the site's location within SAC Bat consultation zones (Greater Horseshoe Bat A; Lesser Horseshoe Bat B) including careful consideration of lighting to sustain key commuting routes for SAC bat populations

7. Flexible and robust building forms that enable changes of use over time.
8. An appropriate response to the character and context of the area. There is considerable scope for a wider variety of building typologies and materials to be used, responding to its mixed-use character whilst respecting the homogenous character of the whole city.
9. Carriageway improvements to the junction, including implementing the road widening required to improve the efficiency and safety of the highway capacity at this junction, and to facilitate pedestrian and cyclist movement.
10. A riverside path that connects to the existing provision to the east and west, and provides for walking and cycling.
11. The safeguarding of a route along the frontage of the site for a potential public transport corridor. Tree planting should be provided along this frontage.
12. The development must provide cycle parking and storage that is covered, secure, convenient, easy to access and well designed.
13. The sequential approach to site layout is required informed by a site-specific FRA. As minimum, the floor levels have to be raised at the appropriate level taking into account the vulnerability classification informed by the FRA.
14. Undertake a detailed historic environment assessment, and where necessary evaluation, in order to identify and implement appropriate mitigation.

Delivery and Implementation

15. Given the sensitive heritage and landscape context development proposals shall be subject to independent design review prior to submission.

Lower Bristol Road Group of Sites

- 2.98 A small cluster of development opportunities has been identified in the vicinity of Avon Buildings and Argyle Terrace on the Lower Bristol Road, as shown on the concept plan below. These sites are included in the Local Plan as they have the potential to come forward for redevelopment or intensification at some point in the future and could therefore help to contribute towards meeting the general housing or employment needs of the city. In addition, some of these sites currently present a poor or ill-defined frontage to Lower Bristol Road and there is an opportunity to improve the quality of townscape on this key route into Bath through appropriate development that responds positively to its context.
- 2.99 Some of these sites are in active and productive use and may well be subject to leases, whilst other sites are underused or vacant. The Local Plan is not relying on these sites to come forward in the Plan period and they have not been promoted by their landowners or other parties, nevertheless they are included in the Local Plan to provide a positive planning policy framework should circumstances change and development proposals emerge. The sites included in this policy are as follows:
- McDonald's site: a relatively compact site, with a currently very popular use, adjacent to a listed building. Whilst opportunities may be limited, there could be the potential to reconfigure the wider site and identify additional built capacity.
 - Avon Buildings: this is made up of a variety of buildings and empty plots with a dominant presence at a slight bend in the road. Collectively or through incremental development, there are opportunities to provide a stronger and more positive frontage to the Lower Bristol Road, with more productive uses.
 - Bathwick Tyres site: this site currently occupied by a thriving business and is in active use, but should circumstances change, there is the potential for this site to be redeveloped and for the use of the site to be intensified.
 - Costa Coffee building: this is a relatively recent building built in the style of the neighbouring Grade II listed 'Former Cabinet Makers Factory', currently occupied by Lidl. It is occupied by a successful business but should circumstances change there is an opportunity to review the development potential of this site, again potentially optimising the airspace above and improving the relationship to the Lower Bristol Road.



Figure 2.10: Lower Bristol Road Group of Sites. This diagram is illustrative. It supports the site allocation policy text, illustrating how site requirements could be achieved.

Policy 2.6: Lower Bristol Road Group of Sites

The sites included in this policy are recognised as having potential for redevelopment, and any proposals will be expected to deliver:

1. The reprovision of the existing quantum of commercial floorspace on each individual site.
2. Residential or employment floorspace on the upper floors. Purpose-Built Student Accommodation (PBSA) will not be permitted.
3. 20% affordable housing on-site, subject to viability and with a tenure split as set out in Policy 6.13.
4. High-quality development with a well-defined and positive frontage to the Lower Bristol Road that enhances this key and prominent route into the city.
5. Buildings respond positively to the important views over the site and the valued character of the area. An analysis is required to enable an appropriate response, and to influence the height, massing and design of buildings. The Bath Building Heights Strategy should be used as part of the evidence base and the starting point for this analysis. This identifies this site as being within zone 3 – the Valley Floor and recommends that for new development ‘building shoulder height should be 4 storeys. One additional setback storey within the roofscape is likely to be acceptable’. Note that this is a recommendation for the general height only and is subject to modifiers.
6. Measures that enhance green infrastructure and protect biodiversity interests are required. Such measures must safeguard the value of the site and the nearby river corridor and should take into account the potential of extending green infrastructure networks. It is a requirement for a biodiversity study to be commissioned to inform the development of the site.
7. Respond to the site's location within SAC Bat consultation zones (Greater Horseshoe Bat A; Lesser Horseshoe Bat C) including careful consideration of lighting to sustain key commuting routes for SAC bat populations.
8. Flexible and robust building forms that enable changes of use over time.
9. An appropriate response to the character and context of the area. There is scope for a variety of building typologies and materials to be used, responding to its

mixed-use character whilst respecting the homogenous character of the whole city.

10. The development must provide cycle parking and storage that is covered, secure, convenient, easy to access and well designed.
11. The sequential approach to site layout is required informed by a site-specific FRA. As minimum, the floor levels have to be raised at the appropriate level taking into account the vulnerability classification informed by the FRA.
12. Undertake a detailed historic environment assessment, and where necessary evaluation, in order to identify and implement appropriate mitigation

Delivery and Implementation

13. In formulating plans for development, adjoining landowners, developers or promoters are expected to work collaboratively to ensure that the development of their sites is complementary.
14. Given the sensitive heritage and landscape context, and the potential requirement to integrate parcels in multiple ownerships, development proposals shall be subject to independent design review prior to submission.

The Production Quarter

Context

- 2.100 This Production Quarter is located to the north of the river and functions as Bath's primary location for industrial enterprise, providing 12 ha of land at Locksbrook Road, Brassmill Lane and the Maltings. 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. Weston Island is anticipated to continue to be used by First Bus who are investing in the electrification of their fleet and of the island, which they own.
- 2.101 The 'Production Quarter Masterplan' is an important part of the evidence base that has informed the site allocation approach for this area. This will continue to protect the important employment role of the area, whilst identifying opportunities to optimise the potential development capacity and delivery transformative environmental and biodiversity enhancements.
- 2.102 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. It will contribute towards wider ambitions in the West of England's Growth Strategy and is a core part of the Bristol to Bath Growth Zone. The Masterplan seeks to respond positively to the valued 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.
- 2.103 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.

- 2.104 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, although the Local Plan is assuming a more modest increase of 25,000 sqm over the plan period. The ability to achieve this scale of change will require public sector intervention as well as significant investment and collaboration with interested parties. To date, 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.
- 2.105 There is an aspiration to 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.

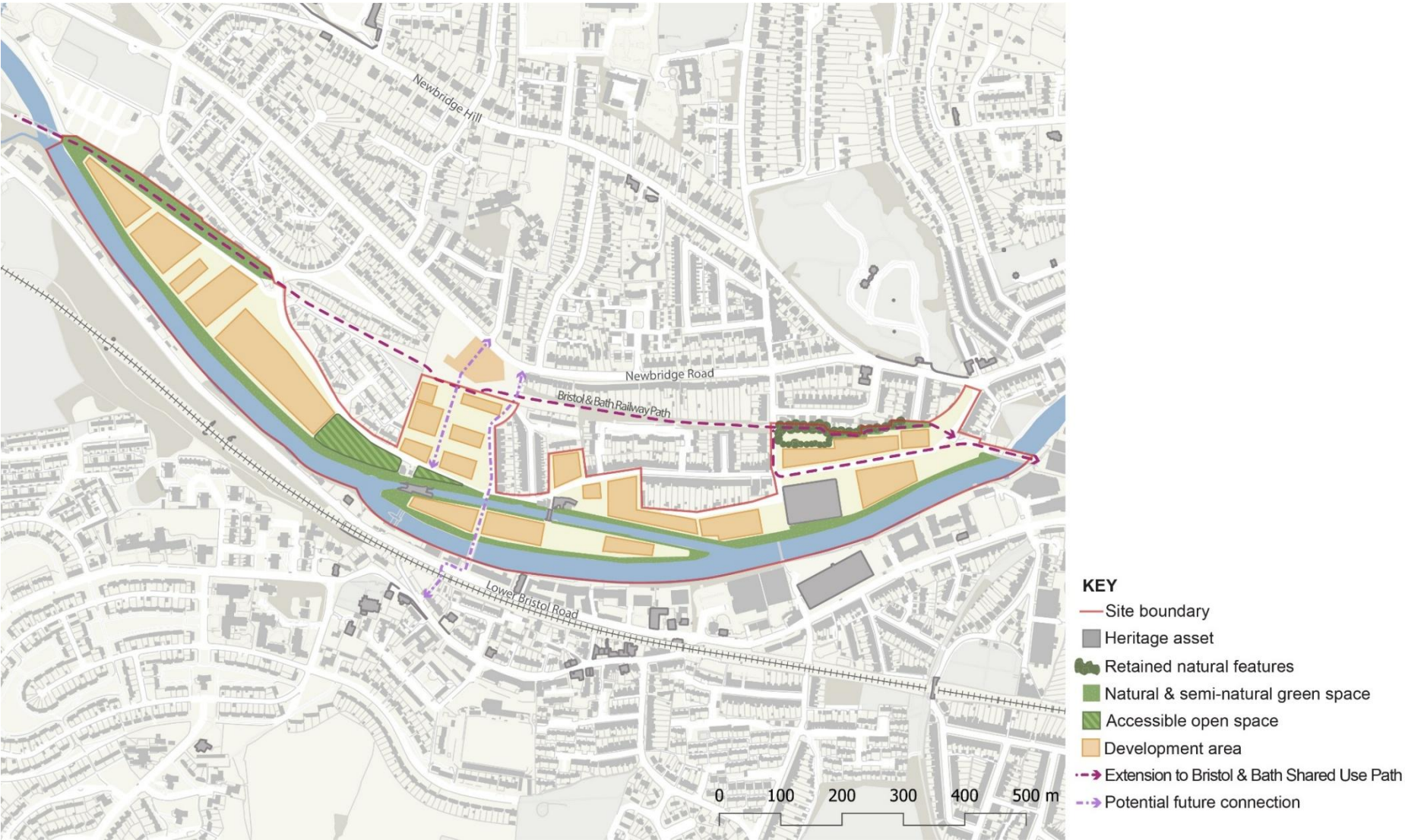


Figure 2.11: The Production Quarter

Policy 2.7: The Production Quarter

Development proposals will

1. Safeguard existing employment floorspace and seek to provide a net increase in business space within Use Classes E(g), B2 and B8 of around 25,000sqm GIA. PBSA, residential accommodation or more academic teaching space will not be permitted except in compliance with Policy SB22 Locksbrook Creativity Hub;
2. Encourage a finer grain of mixed-uses including smaller scale employment units and complementary food and beverage outlets in the areas adjacent to key north-south pedestrian and cycling routes through the area, in particular Station Road through to Lidl and in the vicinity of Weston Island.
3. Respond to the existing varied context of the area and provide a range of building typologies that can more flexibly respond to occupier and/or market demand. Provided these buildings respond positively to the public realm, respect important views through and over the sites, and respond to other issues of acknowledged importance, there is scope for architectural freedom.
4. Respond positively to short and long-distance views having regard to its location within the World Heritage Site and its Outstanding Universal Values including the green setting of the city, the Conservation Area, and respond to the surrounding Listed Buildings and structures. An analysis is required to enable an appropriate response, and to influence the height, massing and design of buildings. The Bath Building Heights Strategy should be used as part of the evidence base and the starting point for this analysis. This identifies this site as being within zone 3 – the Valley Floor and recommends that for new development ‘building shoulder height should be 4 storeys. One additional setback storey within the roofscape is likely to be acceptable’. Note that this is a recommendation for the general height only and is subject to modifiers.
5. Retain and enhance green infrastructure and habitats along the riverside edge, providing a biodiversity led approach towards the treatment of this area. This area of green infrastructure could be used for informal public open space but must retain a habitat function, a light shielding function, and improved access to the river for maintenance purposes. Built form must respond appropriately to this habitat buffer.

6. Create an ecologically rich and biodiverse natural environment, improve the relationship of the built environment to the riverside, improve pedestrian and cyclist permeability.
7. Undertake a detailed historic environment assessment, and where necessary evaluation, in order to identify and implement appropriate mitigation
8. Provide lower cost workspace to support a broader economic offer to the city.
9. Make improvements to pedestrian and cycle routes to and from surrounding communities, including the Local Centres of Chelsea Road and Twerton High Street.

Delivery and Implementation

10. In formulating plans for development, adjoining landowners, developers or promoters are expected to work collaboratively to ensure that the development of their sites is complementary.
11. Given the sensitive heritage and landscape context, and the requirement to integrate parcels in multiple ownerships, development proposals shall be subject to independent design review prior to submission.

For information, see saved Policies:

SB 22: LOCKSBROOK CREATIVE INDUSTRY HUB

SB23: WESTON ISLAND

SB14: TWERTON PARK

SB15: HARTWELLS GARAGE, NEWBRIDGE

SB16: BURLINGTON STREET

SB18: ROYAL UNITED HOSPITAL

SB24: SION HILL

SB25: ST MARTIN'S HOSPITAL

B5: OFF-CAMPUS STUDENT ACCOMMODATION AND TEACHING SPACE

SB19: UNIVERSITY OF BATH AT CLAVERTON DOWN

SB20: BATH SPA UNIVERSITY, NEWTON PARK CAMPUS

B3A: LAND ADJOINING ODD DOWN, BATH STRATEGIC SITE ALLOCATION

SB26: PARK AND RIDE SITES

New Site Allocations

Julian Road

2.106 This is a narrow site with a direct frontage onto Julian Road, backing onto the southern terrace of St James's Square. Approximately half of the site contains employment floorspace occupied by a range of small businesses, and the remainder comprises of garages with hardstanding in front.

2.107 This is an opportunity site that has similarities to other small-scale sites across the city. The Council encourages appropriate development proposals to come forward on these sites to help deliver more homes and jobs throughout the city.



Figure 2.12: Julian Road. This diagram is illustrative. It supports the site allocation policy text, illustrating how site requirements could be achieved.

Policy 2.8: Julian Road (rear of St James's Square)

Development Requirements and Design Principles

Development proposals will:

1. Re-provide the existing quantum of employment floorspace in any redevelopment of the site. This excludes any business use of the garages or the hardstanding.
2. Optimise density across the site, while ensuring that the scale, form and character of development respond positively to the site's context.
3. Deliver 40% affordable housing on-site, subject to viability and with a tenure split as set out in Policy 6.13, will be delivered.
4. Ensure that the built form provides a positive frontage to Julian Road and the surrounding context.
5. Be informed by a comprehensive understanding of the sensitive heritage and landscape context in which the area sits, including undertaking a detailed historic environment assessment, and undertake detailed evaluation and assessment, in order to inform design and to identify and implement appropriate mitigation.
6. Evaluate the potential for archaeological remains across the development site and ensure appropriate mitigation where required.
7. Respond to the site's location within SAC Bat consultation zones (Greater Horseshoe Bat A; Lesser Horseshoe Bat B) including careful consideration of lighting to sustain key commuting routes for SAC bat populations.

Kingswood School Playing Fields

- 2.108 This site is located on the Lansdown plateau to the north of the city, on the route of the Lansdown P&R bus service, and adjacent to the recent Ensleigh development with a local shop and open spaces. The Abbot Alphege Academy primary school opened with that development, but falling pupil numbers meant that the school has had to close. It is likely to be re-opened for specialist educational uses.
- 2.109 The site is within the World Heritage Site, opposite the Grade I listed Beckford's Tower and surrounded by the Cotswold National Landscape. It is in a very sensitive and highly visible location on the edge of the built-up area of the city.
- 2.110 The site has long been used for a range of sports activities by the Kingswood School. These activities include cricket, football, tennis, hockey and athletics and the site allocation ensures that suitable and equivalent provision is made. A new sports pavilion was built on the site less than 20 years ago.
- 2.111 The site will need to be defined through a landscape-led Parameter Plan, with retained landscape features and open land forming the primary framework for any residential layout. It can then deliver a high-quality, carefully contained, lower-rise residential development that is well related to the existing settlement on the edge of the city, the cricket pitch to the west, and is set within a robust and well treed landscape framework to mitigate against the visual sensitivity of its location.
- 2.112 Residents will have good access to the Park and Ride service that runs on a regular basis into Bath and will need to have direct walking and cycling access into the adjacent Ensleigh development to be able to easily access the local shop, other open spaces and the wider route network.



Figure 2.13: Kingswood School Playing Fields. This diagram is illustrative. It supports the site allocation policy text, illustrating how site requirements could be achieved.

Policy 2.9: Kingswood School Playing Fields

Development Requirements and Design Principles

Land Use and Infrastructure

Development proposals will:

1. Deliver residential development of around 90 homes, including a mix of dwelling types and sizes in line with requirements in the Local Housing Needs Assessment. This quantum is subject to a more detailed understanding of the site capacity which will be informed by the Heritage Impact Assessment (HIA), the Landscape and Visual Impact Assessment (LVIA) and a thorough understanding of the potential impacts on the SNCI.
2. Deliver 40% affordable housing on-site, subject to viability and with a tenure split as set out in Policy 6.13.
3. Ensure the re-provision of suitable and equivalent playing pitches, and the retention of the existing sports pavilion, securing its enhanced use as multi-functional community space, with potential to be used for local youth provision, family hub, food hub, and support services. The issue of potential overlooking from the elevated terrace of the existing pavilion into the new housing needs to be resolved through good design.
4. Provide adequate utilities infrastructure to support the scale and phasing of development, through liaison with all relevant utilities' providers.
5. Deliver comprehensive advance planting of key landscape mitigation (trees and woodland) prior to any development phases commencing to ensure delivery of effective mitigation function at the earliest possible stage.

Be supported by the submission of a Green Infrastructure Plan demonstrating how the proposal will:

6. Deliver open space in accordance with the standards set out in appendix 2 of the Local Plan.
7. Retain, enhance, create and restore wildlife rich habitats, having regard to the priorities of the West of England Local Nature Recovery Strategy.

8. Integrate green infrastructure provision with other relevant policy requirements, including the delivery of Biodiversity Net Gain; and
9. Set out a stewardship strategy for all green infrastructure, detailing how it will be managed, maintained, funded and monitored in perpetuity, and how local communities will be engaged in its ongoing management and use.
10. Deliver a comprehensive, nature based sustainable drainage strategy (SuDS) to manage surface water through natural processes. The strategy should prioritise features such as rain gardens and the use of private gardens, seeking to return water to the environment as close as possible to where it falls, and enabling its reuse for non-potable purposes. SuDS must be integrated with the site's green infrastructure network and include robust measures for soil management and the control of surface water runoff during construction, in order to prevent sedimentation and pollution of on site or adjacent watercourses.

Access and Movement

Development proposals will:

11. Provide a safe, direct vehicular access to and from Lansdown Road and ensure that safe, legible and accessible walking routes to bus stops are provided.
12. Deliver the route network and route hierarchy as set out in the concept plan, which provides physical connections and views to Beckford's Tower, the cricket pitch and the neighbouring Ensleigh development.
13. Respond positively to this route network.
14. Ensure that this network of routes is safe, well-lit, overlooked and provides step free walking, cycling and wheeling routes throughout the site and which are integrated into the surrounding area. This includes the route into the neighbouring Ensleigh site, at other points where possible, and to all adjacent public footpaths. No ransom strips are permitted.
15. Prioritise active and inclusive movement, ensuring that everyday journeys are safe, attractive and accessible for people of all ages and abilities.

Climate and Nature

Development proposals will:

Be informed by a comprehensive understanding of the site's ecological context, in particular the SNCI and the need to protect the orchid field to north of the northern boundary as indicated on the concept diagram. A long-term management plan is required to secure protection. This will require the preparation of a detailed Ecological Impact Assessment. Mitigation measures across the site will:

16. Deliver a minimum 20% biodiversity net gain, secured either on-site or through appropriately located off-site measures. Proposals must demonstrate that the mitigation hierarchy, as set out in Articles 37A and 37D of the Town and Country Planning (Development Management Procedure) (England) Order 2015, has been applied.
17. Achieve dark corridors through the site.
18. Retain and protect existing field trees within the site, with buffers extending 5m from the outer edge of the root protection zone or canopy edge, whichever is greater.
19. Provide and maintain a minimum 20m buffer to any Site of Nature Conservation Interest (SNCI) within or adjoining the site. The buffer must comprise habitat of demonstrable ecological value which will be informed by an assessment of the SNCI and the impacts of development on this. There is a requirement for appropriate measures and management to compensate for any loss and impacts and to protect remaining.
20. Incorporate biodiversity enhancement features, including the provision of a minimum of one integrated nest or roosting feature per residential unit. This should be delivered through built in bird and bat boxes (such as swift bricks and bat bricks) within new buildings and, where appropriate, supplemented by standalone features within the public realm (including swift towers and bat walls). Development must also provide a range of additional habitat features, such as log piles, insect hotels, bee bricks, green and brown roofs or walls, and measures to support hedgehog connectivity. Garden boundaries should be designed to be permeable to hedgehogs.
21. Respond to the site's location within the SAC Bat consultation zones (Greater Horseshoe Bat B; Lesser Horseshoe Bat C) including retention, protection and/or provision of key commuting and foraging habitats for SAC bat populations.

Design quality and placemaking principles

Development proposals will:

22. Be informed by a detailed heritage impact assessment (HIA) which assesses the sensitive heritage and landscape context of the site and its effects on development, including cumulative impacts. The assessment will undertake a detailed evaluation and assessment of the Grade I listed Beckford's Tower, the dual-inscribed World Heritage Site, the setting of the Bath Conservation Area and any other heritage assets and their settings in order to inform design and to identify and implement appropriate mitigation.
23. Be informed by a comprehensive Landscape Visual Impact Assessment (LVIA), taking into consideration potential impact on the dual-inscribed World Heritage Site, the Cotswold National Landscape and other sensitive landscape features. The scale and extent of development should be defined through a landscape-led parameter plan, with retained landscape features and open land forming the primary framework for any residential layout. Mitigation across the site will include:
 - a) Planting lines of large-growing deciduous trees along the northern, western and southern boundaries of the site as well as between the housing and the cricket pitch, as indicated on the concept plan. Along the boundary with the orchid field the tree line must be set back from the stone wall by 25m to prevent negative impacts of shading. The tree lines should replicate the visual effect created at maturity by the existing tree lines within and around the adjacent Ensleigh development to the east. The provision of tree buffer of along the north and west boundaries of the site is required.
 - b) For each line of trees there will need to be a minimum 10m minimum area of accessible open space either side of the trunks, to enable large canopy spread. Along the western boundary create a larger accessible open space area
 - c) Introduce a north-south running line of large growing trees with associated 20m wide open space, through the core of the development to replicate that within the adjacent Ensleigh development
 - d) Introduce a clump of trees into the north-west corner of the site
24. Evaluate the potential for archaeological remains across the development site and ensure appropriate mitigation where required.

Delivery and Implementation

25. Given the site's sensitive heritage and landscape context development proposals shall be subject to independent design review prior to submission.

Bath Equestrian Centre

- 2.113 The site is north of Eastfield Avenue in Weston. It is within and at the foot of the Cotswold National Landscape escarpment, with the escarpment extending to the north, west and (on the south side of Weston) to the south.
- 2.114 The site contains an assortment of larger and smaller, single storey buildings as well as an open area related to its former use as an equestrian centre. Access is via Weston Farm Lane, a narrow adopted road with few passing places. It is currently well vegetated so the existing equestrian centre development is only apparent from a limited number of viewpoints. The visibility of development on the site is likely to increase significantly with a new housing development, but this would be viewed in the context of the adjacent urban area.
- 2.115 The site is currently located in the Green Belt. Exceptional circumstances exist to justify the release of the site from the Green Belt, as set out in supporting evidence.
- 2.116 The exceptional circumstances that justify why development is proposed within the National Landscape are: the need for development, the limited harm to the NL and the extent to which harm can be moderated.
- 2.117 It is allocated as a small-scale housing site set within a well treed context to respond to its sensitive context. However, a key challenge for this site is being able to demonstrate adequate access to service the development. Whilst the principle of development is accepted there are significant highway concerns that would need to be investigated and overcome before a scheme could be approved. The capacity of the site will be determined to some extent by the resolution of the highway access issues.



Figure 2.14: Bath Equestrian Centre. This diagram is illustrative. It supports the site allocation policy text, illustrating how site requirements could be achieved.

Policy 2.10: Bath Equestrian Centre

Development Requirements and Design Principles

Land Use and Infrastructure

Subject to the appropriate resolution of ensuring appropriate highways access, development proposals will:

26. Deliver residential development of around 40 homes, including a mix of dwelling types and sizes in line with requirements in the Local Housing Needs Assessment.
27. Deliver 40% affordable housing on-site, subject to viability and with a tenure split as set out in Policy 6.13.
28. Provide adequate utilities infrastructure to support the scale and phasing of development, through liaison with all relevant utilities providers.
29. Deliver comprehensive advance planting of key landscape mitigation (woodland) prior to any development phases commencing to ensure delivery of effective mitigation function at the earliest possible stage.
30. Be supported by the submission of a Green Infrastructure Plan demonstrating how the proposal will:
 - a) Deliver open space in accordance with the standards set out in appendix 2 of the Local Plan.
 - b) Retain, enhance, create and restore wildlife rich habitats, having regard to the priorities of the West of England Local Nature Recovery Strategy.
 - c) Integrate green infrastructure provision with other relevant policy requirements, including the delivery of Biodiversity Net Gain; and
 - d) Set out a stewardship strategy for all green infrastructure, detailing how it will be managed, maintained, funded and monitored in perpetuity, and how local communities will be engaged in its ongoing management and use.
31. Deliver a comprehensive, nature based sustainable drainage strategy (SuDS) to manage surface water through natural processes. The strategy should prioritise features such as rain gardens and the use of private gardens, seeking to return water to the environment as close as possible to where it falls, and enabling its

reuse for non-potable purposes. SuDS must be integrated with the site's green infrastructure network and include robust measures for soil management and the control of surface water runoff during construction, in order to prevent sedimentation and pollution of on site or adjacent watercourses.

Access and Movement

Development proposals will:

32. Provide safe vehicular access from Weston Farm Lane, unless alternative routes can be realised.
33. Ensure that the route network allows for the future potential to connect into the land to the west of the site by considering alignment and avoiding ransom strips.
34. Deliver a connected network of walking, cycling and wheeling routes throughout the site, integrating into the surrounding area.
35. Connect into the existing public footpath adjacent to 77 Eastfield Avenue and provide suitable improvements in lighting, width and overlooking to ensure that this route is safe and attractive to use.
36. Contribute towards sustainable travel improvements in the local area as determined by Transport Assessment.

Climate and Nature

Development proposals will be informed by a comprehensive understanding of the site's ecological context. This will require the preparation of a detailed Ecological Impact Assessment. Mitigation measures across the site will:

37. Deliver a minimum 20% biodiversity net gain, secured either on-site or through appropriately located off-site measures. Proposals must demonstrate that the mitigation hierarchy, as set out in Articles 37A and 37D of the Town and Country Planning (Development Management Procedure) (England) Order 2015, has been applied.
38. Retain, restore and enhance key boundary hedgerows and tree lines. A minimum 10m habitat buffer shall be provided to all retained hedgerows, measured from the hedge centre line or 5m from the outer edge of the root protection zone or canopy edge of any hedgerow trees, whichever is greater. The location of utilities within the site should take account of buffers to trees and hedgerows Then:.

- a) Strengthen / plant (native species) hedgerows along the entire boundary – these hedgerows should be outside the curtilage of individual properties and should be managed for wildlife as well as to screen the site. The northern and eastern boundaries need particular attention.
- b) Conifers and other that don't make a meaningful contribution to the screening of the site should be removed and replaced with native, locally characteristic species.
- c) Avoid and minimise lighting to the extent that is reasonably practicable and apply best practice guidance, and achieve dark corridors through the site.

- 39. Achieve minimal breaks through retained hedgerows, including for access and embedding habitat connectivity into the design.
- 40. Retain and protect existing field trees within the site, with buffers extending 5m from the outer edge of the root protection zone or canopy edge, whichever is greater.
- 41. Incorporate biodiversity enhancement features, including the provision of a minimum of one integrated nest or roosting feature per residential unit. This should be delivered through built in bird and bat boxes (such as swift bricks and bat bricks) within new buildings and, where appropriate, supplemented by standalone features within the public realm (including swift towers and bat walls). Development must also provide a range of additional habitat features, such as log piles, insect hotels, bee bricks, green and brown roofs or walls, and measures to support hedgehog connectivity. Garden boundaries should be designed to be permeable to hedgehogs.
- 42. Respond to the site's location within the SAC Bat consultation zones (Greater Horseshoe Bat B; Lesser Horseshoe Bat C) including retention, protection and/or provision of key commuting and foraging habitats for SAC bat populations.

Design quality and placemaking principles

This is a very sensitive, sloping site on the edge of Weston, within a dual-inscribed World Heritage Site and within the Cotswold National Landscape. Parts of the site are well vegetated with numerous trees within the site and along the site boundary. New development must:

- 43. Plant woodland on the northern slopes in accordance with the concept plan. Species should be both appropriate to the local context and climate resilient"

44. Be designed to fit within and be subservient to its well vegetated context.
45. Deliver low key and simple built forms and roof treatments and use natural materials to assimilate development into the landscape.
46. Optimise density across the site, while ensuring that the scale, form and character of development respond positively to the site's context, including heritage assets and landscape character.
47. Be informed by a comprehensive Landscape Visual Impact Assessment, taking into consideration the potential impacts on the dual-inscribed World Heritage Site and the Cotswolds National Landscape, and other sensitive landscape features.
48. Be informed by a comprehensive understanding of the sensitive heritage and landscape context in which the area sits, including undertaking a detailed historic environment assessment, to include assessment of the effects of development proposals on the WHS and the Conservation Area, and undertake detailed evaluation and assessment, in order to inform design and to identify and implement appropriate mitigation.
49. Evaluate the potential for archaeological remains across the development site and ensure appropriate mitigation where required.

Delivery and Implementation

50. Given the site's sensitive heritage and landscape context development proposals shall be subject to independent design review prior to submission.

North of Napier Road

- 2.118 This site is located to the north-west of the city in Weston and to the west of Lansdown Lane which connects Weston village to Lansdown Road. The site is in agricultural use on a prominent and sensitive hillside within the dual-inscribed World Heritage Site and within the Cotswold National Landscape. It is adjacent and to the north of the development surrounding Napier Road, and to the south of Heather Farm.
- 2.119 Subject to the resolution of challenging highway issues the site has the potential to deliver a high-quality residential development with significant tree planting to the west that helps to soften the edge of built development in this very sensitive location.
- 2.120 The site is currently located in the Green Belt. Exceptional circumstances exist to justify the release of the site from the Green Belt, as set out in supporting evidence.
- 2.121 The exceptional circumstances that justify why development is proposed within the National Landscape are: the need for development, the limited harm to the NL and the extent to which harm can be moderated.



Figure 2.15: North of Napier Road. This diagram is illustrative. It supports the site allocation policy text, illustrating how site requirements could be achieved.

Policy 2.11: North of Napier Road

Development Requirements and Design Principles

Land Use and Infrastructure

Development proposals will:

1. Deliver residential development of around 40 homes, including a mix of dwelling types and sizes in line with requirements in the Local Housing Needs Assessment.
2. Deliver 40% affordable housing on-site, subject to viability and with a tenure split as set out in Policy 6.13.
3. Deliver adequate utilities infrastructure to support the scale and phasing of development, through liaison with all relevant utilities providers.
4. Deliver comprehensive advance planting of key landscape mitigation (woodland) as shown on the concept plan prior to any development phases commencing to ensure delivery of effective mitigation function at the earliest possible stage. This landscape mitigation will establish the new robust, readily recognisable and defensible Green Belt boundary.
5. Be supported by the submission of a Green Infrastructure Plan demonstrating how the proposal will:
 - a) Deliver a woodland of primarily native, climate resilient trees and understorey shrubs in the western edge of the site as indicated on the concept plan. Land area approx. 1.8ha.
 - b) Deliver large growing tree species to the north of the site and throughout the development to reinforce existing character and increase screening to mitigate Cotswold views.
 - c) Deliver open space in accordance with the standards set out in appendix 2 of the Local Plan.
 - d) Retain, enhance, create and restore wildlife rich habitats, having regard to the priorities of the West of England Local Nature Recovery Strategy.

- e) Integrate green infrastructure provision with other relevant policy requirements, including the delivery of Biodiversity Net Gain; and
 - f) Set out a stewardship strategy for all green infrastructure, detailing how it will be managed, maintained, funded and monitored in perpetuity, and how local communities will be engaged in its ongoing management and use.
6. Deliver a comprehensive, nature based sustainable drainage strategy (SuDS) to manage surface water through natural processes. The strategy should prioritise features such as rain gardens and the use of private gardens, seeking to return water to the environment as close as possible to where it falls, and enabling its reuse for non-potable purposes. SuDS must be integrated with the site's green infrastructure network and include robust measures for soil management and the control of surface water runoff during construction, in order to prevent sedimentation and pollution of on site or adjacent watercourses.

Climate and Nature

Development proposals will be informed by a comprehensive understanding of the site's ecological context. This will require the preparation of a detailed Ecological Impact Assessment. Mitigation measures across the site will:

- 7. Deliver a minimum 20% biodiversity net gain, secured either on-site or through appropriately located off-site measures. Proposals must demonstrate that the mitigation hierarchy, as set out in Articles 37A and 37D of the Town and Country Planning (Development Management Procedure) (England) Order 2015, has been applied.
- 8. Achieve dark corridors through the western undeveloped parts of the site.
- 9. Protect the proposed new woodland within the western parts of the site through provision of:
 - a) A minimum 20m buffer, measured from the outer edge of the root protection zone (RPZ) or canopy edge, whichever is greater. The inner 10m of this buffer should be designed to facilitate the establishment of woodland edge habitat and must remain free of built development and hard infrastructure.
- 10. Incorporate biodiversity enhancement features, including the provision of a minimum of one integrated nest or roosting feature per residential unit. This should be delivered through built in bird and bat boxes (such as swift bricks and

bat bricks) within new buildings and, where appropriate, supplemented by standalone features within the public realm (including swift towers and bat walls). Development must also provide a range of additional habitat features, such as log piles, insect hotels, bee bricks, green and brown roofs or walls, and measures to support hedgehog connectivity. Garden boundaries should be designed to be permeable to hedgehogs.

11. Respond to the site's location within the SAC Bat consultation zones (Greater Horseshoe Bat B; Lesser Horseshoe Bat C) including retention, protection and/or provision of key commuting and foraging habitats for SAC bat populations.

Access and Movement

Development proposals will:

12. Provide safe vehicular access from Lansdown Lane.
13. Prioritise active and inclusive movement, ensuring that everyday journeys are safe, attractive and accessible for people of all ages and abilities. This includes:
 - a) Delivering highway improvements to provide safe and non-hazardous walking and cycling route access to existing schools.
 - b) Providing a permeable route network throughout the site and allowing for potential connections, avoiding ransom strips, into the current employment area to the north. These should be designed so that they can be used by vehicles, pedestrians and cycles.
 - c) Explore the potential to provide active travel connections into Napier Road.
14. Improve connectivity to the bus stops on Lansdown Lane, Napier Road and Leighton Road, including continuous side road crossings.
15. Extend the existing of speed limit of Lansdown Lane and contribute towards sustainable travel improvements in the local area as determined by Transport Assessment.

Design quality and placemaking principles

Development proposals will:

16. Optimise density across the site, while ensuring that the scale, form and character of development respond positively to the site's context, including heritage assets, landscape character, and the form of the existing settlement.

17. Be informed by a comprehensive Landscape Visual Impact Assessment, taking into consideration potential impact on the dual-inscribed World Heritage sites and Cotswold National Landscape, and other sensitive landscape features. Mitigation across the site will include:
 - a) A woodland provided as indicated on the concept plan to prevent development being visible from PROWs including Cotswolds Way and also any views from Kelston Roundhill.
18. Be informed by a comprehensive understanding of the sensitive heritage and landscape context in which the area sits, including undertaking a detailed historic environment assessment, to include assessment of the effects of development proposals on the double-inscribed World Heritage Site and adjacent listed building, and undertake detailed evaluation and assessment, in order to inform design and to identify and implement appropriate mitigation.
19. Evaluate the potential for archaeological remains across the development site and ensure appropriate mitigation where required.

Delivery and Implementation

20. Given the site's sensitive heritage and landscape context development proposals shall be subject to independent design review prior to submission.

Car Park adjacent to Combe Park

- 2.122 This site lies to the south of Lansdown Cricket Club and the RUH, and is sandwiched between St John's Combe Park, a residential development for the over 65s to the west and Combe Park to the east. There is a strip of hedges, shrubs and a number of mature trees protected by TPOs along the frontage with the road.
- 2.123 The site is currently used as a small car park which is leased to the RUH, but presents an opportunity for a high-quality, small-scale residential development that complements the existing St John's Combe Park development and enhances the relationship to Combe Park.



Figure 2.16: Car Park adjacent to Combe Park. This diagram is illustrative. It supports the site allocation policy text, illustrating how site requirements could be achieved.

Policy 2.12: Car Park adjacent to Combe Park

Development Requirements and Design Principles

Land Use and Infrastructure

Development proposals will:

21. Deliver residential development of around 30 homes, including a mix of dwelling types and sizes in line with requirements in the Local Housing Needs Assessment.
1. Deliver 40% affordable housing on-site, subject to viability and with a tenure split as set out in Policy 6.13.
2. Provide adequate utilities infrastructure to support the scale and phasing of development, through liaison with all relevant utilities providers.
3. Be supported by the submission of a Green Infrastructure Plan demonstrating how the proposal will:
 - a) Deliver open space in accordance with the standards set out in Appendix 2 of the Local Plan.
 - b) Retain, enhance, create and restore wildlife rich habitats, having regard to the priorities of the West of England Local Nature Recovery Strategy.
 - c) Integrate green infrastructure provision with other relevant policy requirements, including the delivery of Biodiversity Net Gain; and
 - d) Set out a stewardship strategy for all green infrastructure, detailing how it will be managed, maintained, funded and monitored in perpetuity, and how local communities will be engaged in its ongoing management and use.
4. Deliver a comprehensive, nature based sustainable drainage strategy (SuDS) to manage surface water through natural processes. The strategy should prioritise features such as rain gardens and the use of private gardens, seeking to return water to the environment as close as possible to where it falls, and enabling its reuse for non-potable purposes. SuDS must be integrated with the site's green infrastructure network and include robust measures for soil management and the control of surface water runoff during construction, in order to prevent sedimentation and pollution of on site or adjacent watercourses.

Access and Movement

Development proposals will:

5. Provide safe vehicular access from Combe Park
6. A financial contribution towards public transport improvements.

Climate and Nature

Development proposals will:

7. Be informed by a comprehensive understanding of the site's ecological context. This will require the preparation of a detailed Ecological Impact Assessment.

Mitigation measures across the site will:

- a) Deliver a minimum 20% biodiversity net gain, secured either on-site or through appropriately located off-site measures. Proposals must demonstrate that the mitigation hierarchy, as set out in Articles 37A and 37D of the Town and Country Planning (Development Management Procedure) (England) Order 2015, has been applied.
 - b) Achieve dark corridors through the site.
 - c) Incorporate biodiversity enhancement features, including the provision of a minimum of one integrated nest or roosting feature per residential unit. This should be delivered through built in bird and bat boxes (such as swift bricks and bat bricks) within new buildings and, where appropriate, supplemented by standalone features within the public realm (including swift towers and bat walls). Development must also provide a range of additional habitat features, such as log piles, insect hotels, bee bricks, green and brown roofs or walls, and measures to support hedgehog connectivity. Garden boundaries should be designed to be permeable to hedgehogs.
8. Retain, restore and enhance the existing planted area between the development site and Combe Park, ensuring suitable buffers between development.
 9. Respond to the site's location within SAC Bat consultation zones (Greater Horseshoe Bat B; Lesser Horseshoe Bat B) including careful consideration of lighting to sustain key commuting routes for SAC bat populations.

Design quality and placemaking principles

Development proposals will:

10. Optimise density across the site, while ensuring that the scale, form and character of development respond positively to the site's context, in particular the dominant building lines and building height along Combe Park.
11. Enhance the well vegetated frontage to Combe Park
12. Be informed by a comprehensive understanding of the sensitive heritage and landscape context in which the area sits, including undertaking an appropriate historic environment assessment, to include assessment of the effects of development proposals in order to inform design and to identify and implement appropriate mitigation.
13. Evaluate the potential for archaeological remains across the development site and ensure appropriate mitigation where required.

Delivery and Implementation

14. Given the site's sensitive heritage and landscape context development proposals shall be subject to independent design review prior to submission.

Land East of Station Road

- 2.124 This site lies to the east of Station Road and comprises two long rectangular land parcels next to each other. The northern most parcel, along which ran the former Midland Railway (Bath Branch) that connected Bath and Bristol via Mangotsfield, is very densely treed and forms part of a nature rich corridor that along the former railway line. The southern most parcel comprises a hardstanding and is largely open, bordered by trees along its edge. The site is largely unused except for some storage.
- 2.125 The site is sandwiched between existing residential development and garages along Ashely Road to the north, and the existing site allocation of Locksbrook Creative Industry Hub to the south. This latter site is owned by Bath Spa University, and they are planning to redevelop this site to provide student housing, employment space, and dedicated academic facilities
- 2.126 Part of the site is safeguarded for an extension to the sustainable transport route as set out in Policy ST2.
- 2.127 The Station Road site is to be allocated for high-quality, low carbon housing to help address housing need, and to potentially provide an extension of the Bristol to Bath shared use path.
- 2.128 The availability and use of the garages to the north of the site is unknown, and the extension of the site into this area, either for more residential development or/and for access would be supported in principle, subject to the protection of valued trees and an appropriate response to the existing residential amenity.

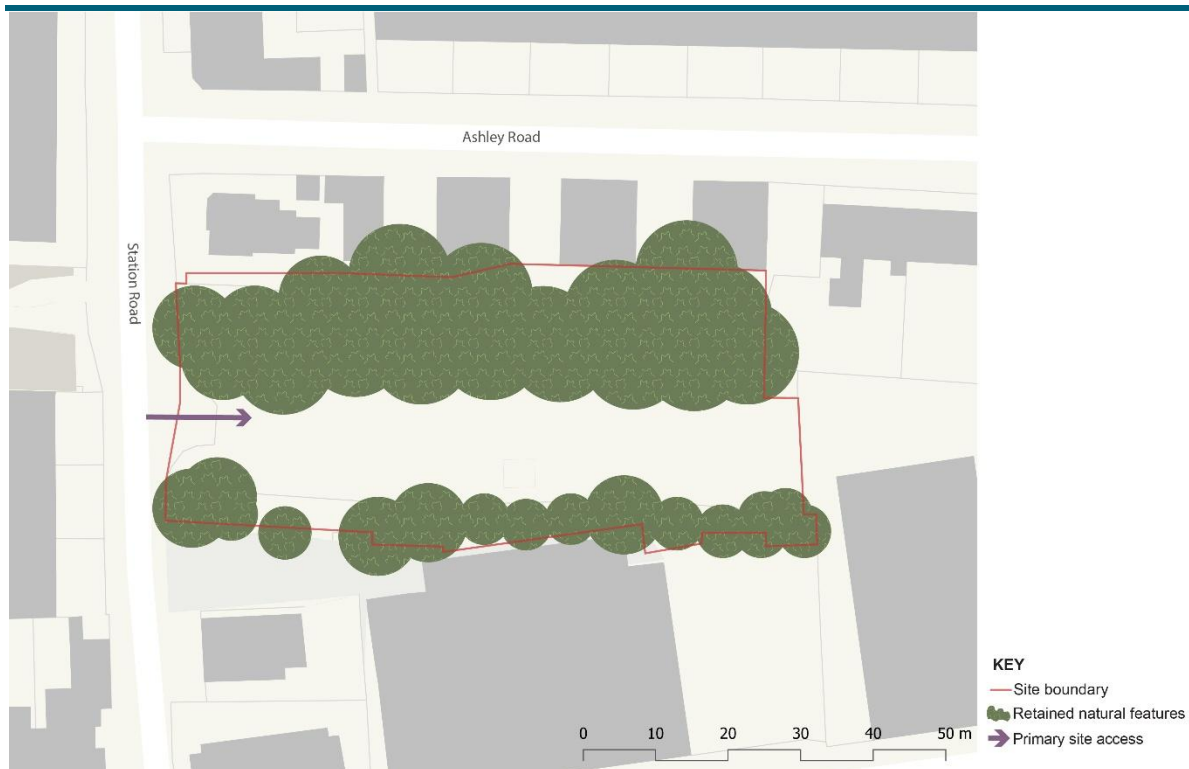


Figure 2.17: Land East of Station Road. This diagram is illustrative. It supports the site allocation policy text, illustrating how site requirements could be achieved.

Policy 2.13: Land East of Station Road

Development Requirements and Design Principles

Land Use and Infrastructure

Development proposals will:

1. Deliver residential development of around 20 homes, including a mix of dwelling types and sizes in line with requirements in the Local Housing Needs Assessment.
2. Deliver 40% affordable housing on-site, subject to viability and with a tenure split as set out in Policy 6.13.
3. Provide adequate utilities infrastructure to support the scale and phasing of development, through liaison with all relevant utilities providers.
4. Be supported by the submission of a Green Infrastructure Plan demonstrating how the proposal will:
 - a) Deliver open space in accordance with the standards set out in appendix 2 of the Local Plan.

- b) Retain, enhance, create and restore wildlife rich habitats, having regard to the priorities of the West of England Local Nature Recovery Strategy.
 - c) Integrate green infrastructure provision with other relevant policy requirements, including the delivery of Biodiversity Net Gain; and
 - d) Set out a stewardship strategy for all green infrastructure, detailing how it will be managed, maintained, funded and monitored in perpetuity, and how local communities will be engaged in its ongoing management and use.
5. Deliver a comprehensive, nature based sustainable drainage strategy (SuDS) to manage surface water through natural processes. The strategy should prioritise features such as rain gardens and the use of private gardens, seeking to return water to the environment as close as possible to where it falls, and enabling its reuse for non-potable purposes. SuDS must be integrated with the site's green infrastructure network and include robust measures for soil management and the control of surface water runoff during construction, in order to prevent sedimentation and pollution of on site or adjacent watercourses.

Access and Movement

Development proposals will:

- 6. Provide safe vehicular access from Station Road.
- 7. Provide for the extension of the Bristol and Bath shared use path through this site. Pending the availability of the other safeguarded land further to the east and subject to further route assessment and collaboration with adjoining landowners, there is the potential for an interim route to follow an alternative alignment.

Climate and Nature

8. Development proposals will be informed by a comprehensive understanding of the site's ecological context. This will require the preparation of a detailed Ecological Impact Assessment. Mitigation measures across the site will:
- a) Deliver a minimum 20% biodiversity net gain, secured either on-site or through appropriately located off-site measures. Proposals must demonstrate that the mitigation hierarchy, as set out in Articles 37A and 37D of the Town and Country Planning (Development Management Procedure) (England) Order 2015, has been applied.
 - b) Achieve dark corridors through the site.

- c) Assess the existing trees and their biodiversity value and provide appropriate mitigation and a buffer to ensure their continued protection and enhancement.
- d) Incorporate enhancement features, including the provision of a minimum of one integrated nest or roosting feature per residential unit. This should be delivered through built in bird and bat boxes (such as swift bricks and bat bricks) within new buildings and, where appropriate, supplemented by standalone features within the public realm (including swift towers and bat walls). Development must also provide a range of additional habitat features, such as log piles, insect hotels, bee bricks, green and brown roofs or walls, and measures to support hedgehog connectivity. Garden boundaries should be designed to be permeable to hedgehogs.
- e) Respond to the site's location within SAC Bat consultation zones (Greater Horseshoe Bat A; Lesser Horseshoe Bat B) including careful consideration of lighting to sustain key commuting routes for SAC bat populations.

Design quality and placemaking principles

Development proposals will:

- 9. Optimise density across the site, while ensuring that the scale, form and character of development respond positively to the site's context.
- 10. Ensure that built form responds positively to Station Road and responds positively to the building line of no. 16 Station Road.
- 11. Be informed by a comprehensive understanding of the sensitive heritage and landscape context in which the area sits, including undertaking a detailed historic environment assessment, and undertake detailed evaluation and assessment, in order to inform design and to identify and implement appropriate mitigation.
- 12. Evaluate the potential for archaeological remains across the development site and ensure appropriate mitigation where required.

Delivery and Implementation

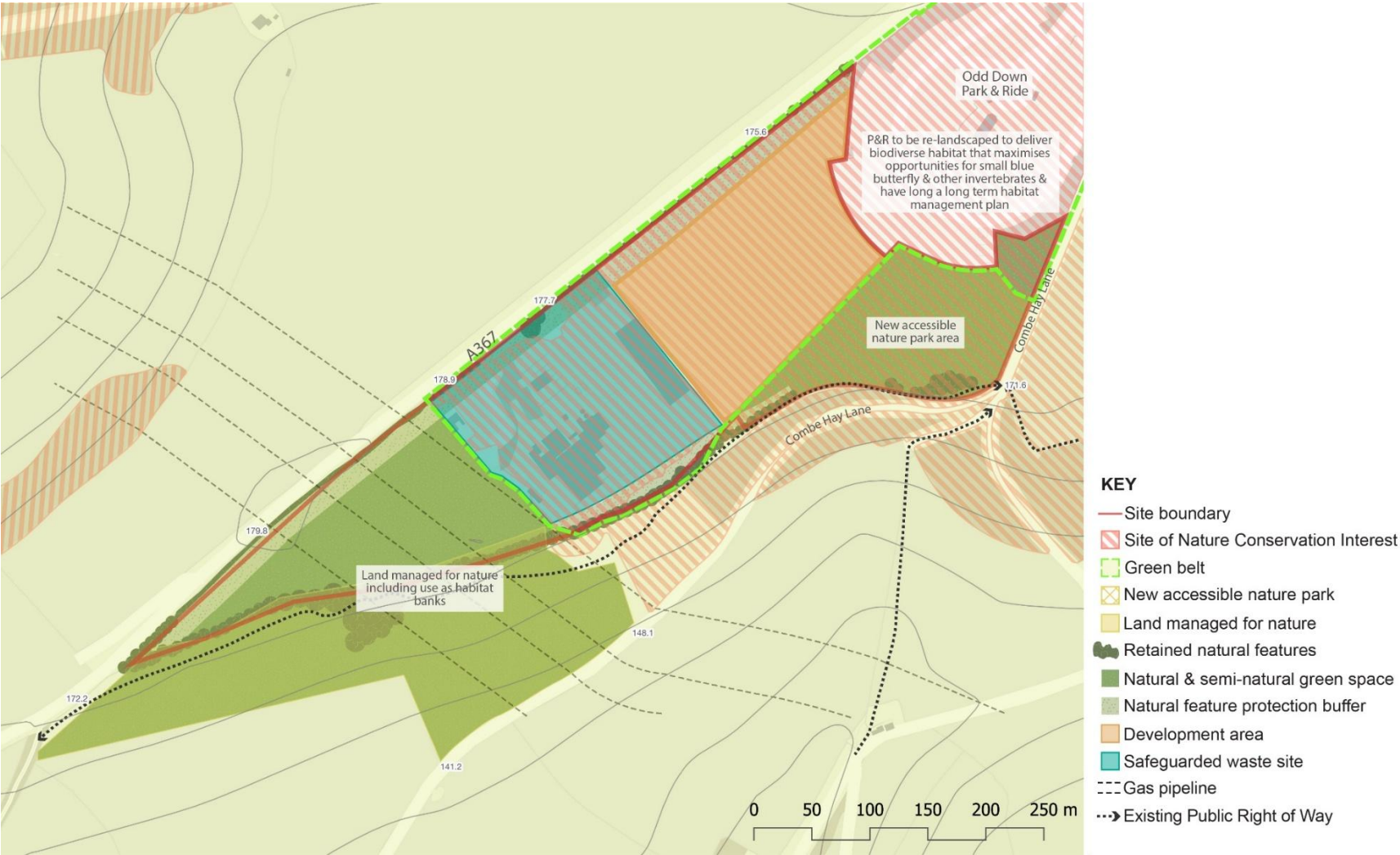
- 13. In formulating plans for the development of the site, the landowner, developer or promoter is expected to work collaboratively with Bath Spa University who own the adjacent site to ensure that the developments of their sites are complementary.

14. Given the site's sensitive heritage and landscape context development proposals shall be subject to independent design review prior to submission.

South-West of the Odd Down Park & Ride site

- 2.129 The Odd Down site is located adjacent to the A367, the old Roman road Fosse Way, and to the south-west of the Odd Down Park & Ride (P&R).
- 2.130 The whole area is a Site of Nature Conservation Importance (SNCI) and the majority of the site is an important grassland/scrub habitat with some areas known to be habitat for small blue butterflies. It is also likely to contain key commuting and foraging / feeding habitats for the bat populations of the Bath & Bradford Bats Special Area of Conservation (SAC), located less than 2km away.
- 2.131 The site is within the setting of the dual-inscribed World Heritage Site and the majority of the site is outside the Cotswold National Landscape (CNL), with the existing woodland to the south-east of the recycling site, within the National Landscape. There are two groups of trees with TPOs which are situated on either side of the access road into the waste site. The site is currently located in the Green Belt. Exceptional circumstances exist to justify the release of the site from the Green Belt, as set out in supporting evidence.
- 2.132 Development on the site has the potential to impact on views from Coombe Hay Lane (part of which is used by the 'Limestone Link' walk) and from the footpath that runs through the Cotswold National Landscape section of the site (PROW BA7/1). Landscape mitigation is required.
- 2.133 The existing waste facility is currently in active use and this will be safeguarded throughout the Plan Period.
- 2.134 First and foremost, this whole area is a designated SNCI, an operational waste site and the P&R is an essential piece of strategic transport infrastructure. Opportunities to provide additional and much needed employment floorspace that help meet objectively assessed needs and to help facilitate the redevelopment and regeneration of existing sites within Bath must be brought forward and considered within this context. Any employment uses that do come forward must not prejudice the operational use of the safeguarded waste site (see Agent of Change principles).

- 2.135 Subject to detailed ecological assessment, there are opportunities to create a biodiversity and employment park, providing jobs and boosting the economy, whilst enhancing its designation as an SNCI and providing an invaluable resource for people and nature.
- 2.136 There is also the potential of providing an additional access to the P&R site from the A367. This will help to alleviate traffic from the roundabout at the current entrance to the P&R.



Policy 2.14: SW of the Odd Down Park & Ride site

Development Requirements and Design Principles

Prior to any planning applications being considered for development in the area between the existing P&R and the operational waste site, a detailed and comprehensive ecological assessment must be undertaken. This will identify the most appropriate ecological management for the site and its hinterland and shall be undertaken in accordance with a brief agreed with the Council's Ecologists.

The waste facility is currently in active use and this will be safeguarded throughout the Plan Period.

Land Use and Infrastructure

Development proposals will:

1. Subject to a detailed ecological assessment, deliver employment floorspace set within nature rich landscaping, including biodiverse green roofs. The capacity and extent of employment development will be determined by the ecological assessment.
2. Ensure that employment uses do not prejudice the continued operation of the waste facility and only uses within B2 (general industrial) and/or B8 (storage and distribution) will be acceptable in principle on the land immediately adjacent to the existing recycling business. Between this portion and the P&R site, a wider range of employment uses within Class E(g) such as R&D and light industrial will be permitted, subject to 'Agent of Change' principles.
3. Provide for a potential extension to the existing Odd Down Park and Ride facilities should future evidence demonstrate the need.
4. Submit a Green Infrastructure Plan, setting out how a development will:
 - a) Deliver green infrastructure in accordance with the green infrastructure standards and green infrastructure outcomes
 - b) Take account of the Local Nature Recovery Strategy and the creation and restoration of wildlife rich habitats
 - c) Integrate with other relevant policy requirements including provision of Biodiversity Net Gain (BNG).

- d) Set out the stewardship strategy for the green infrastructure, setting out how it will be managed, maintained and monitored in perpetuity, including its governance, funding model, and community engagement
- 5. Provide a comprehensive, nature based sustainable drainage strategy (SuDS) that manages surface water through natural processes, integrates with the site's green and blue infrastructure network, and includes robust measures for the management of soils during construction to prevent sediment runoff and maintain water quality.
- 6. Ensure adequate utilities infrastructure to support the scale and phasing of development, through liaison with all relevant utilities providers.

Access and Movement

Development proposals will undertake an access strategy for the development of the whole site. It is anticipated that this will:

- 7. Utilise the existing access into the recycling site from the A367 and extend this to the adjoining land parcels, and potentially a new access into the P&R site; and/or
- 8. Provide an additional vehicular access directly from the A367 to access the employment allocation, with the potential for this route to provide an additional access and egress to the Odd Down Park & Ride. Any new access should not impede the established access to the existing recycling site.
- 9. The delivery of walking, cycling and wheeling routes throughout the site, and integrating into the surrounding area, including connections to Odd Down Park and Ride and to Combe Hay Lane.
- 10. The provision of the following public transport enhancements:
 - a) Pedestrian and cycle access to Odd Down Park and Ride from the development sites.
 - b) A covered bus stop on the A367 with real time information

A contribution to transforming the Odd Down P&R to a transport interchange.

Climate and Nature

Development proposals will

- 11. Be informed by a comprehensive understanding of the site's ecological context. This will require the preparation of a detailed Ecological Impact Assessment to

identify the most appropriate ecological management for the site. Mitigation measures across the site may include requirements to:

- a) extend the area of woodland cover (with species that are found in the SNCI woodland); and/or
 - b) manage the land as habitat for small blue butterflies;
 - c) Depending on the most appropriate management option for enhancing biodiversity, it may be appropriate to plant a hedge along the north-western and northern boundaries of this section.
 - d) Require the re-landscaping of the P&R site to deliver a biodiverse habitat that maximises the opportunity for small blue butterfly and other invertebrates and have a long-term habitat management plan.
 - e) Provide a new accessible nature park area to the south-west of the existing P&R.
 - f) Identify land to be managed for nature including use as a habitat bank.
12. Deliver a minimum of 20% biodiversity net gain, secured either on-site or through appropriately located off-site measures. Proposals must demonstrate that the mitigation hierarchy, as set out in Articles 37A and 37D of the Town and Country Planning (Development Management Procedure) (England) Order 2015, has been applied.
13. Retain, restore and enhance key existing internal and boundary hedgerows. A minimum 10m habitat buffer shall be provided to all retained hedgerows, measured from the hedge centre line or 5m from the outer edge of the root protection zone or canopy edge of any hedgerow trees, whichever is greater. The location of utilities within the site should take account of buffers to trees and hedgerows.
14. Ensure that where buildings are adjacent to hedgerows and or woodlands and their buffers, the amount of space required between building elevations and hedgerow or tree canopy edge is carefully designed so as to create well-proportioned, pleasant, functional places for humans which also support and encourage the wildlife within the hedgerow network.
15. Achieve minimal breaks through retained hedgerows, including for access and embedding habitat connectivity into the design.
16. Achieve dark corridors through the site.

17. Protect existing woodland adjacent to the site through provision of a minimum 20m buffer, measured from the outer edge of the root protection zone (RPZ) or canopy edge, whichever is greater. The inner 10m of this buffer should be designed to facilitate woodland extension and the establishment of woodland edge habitat through natural succession or planting and must remain free of built development and hard infrastructure.
18. At development edges where readily recognisable physical features do not currently exist, development shall provide substantial structural planting, landscaping and multifunctional green infrastructure along the outer edge of the allocation to establish a robust, readily recognisable and defensible Green Belt boundary.
19. Provide a management programme/regime for the SNCI woodland within the CNL section and any additional woodland that is planted, to maximise benefits for biodiversity.
20. Respond to the key commuting and foraging/feeding habitats for the bat populations of the SAC.
21. Provide integrated bird and bat boxes within new buildings, and/or as standalone features within the public realm, such as bat walls and swift towers. Additional features such as log piles, insect hotels, bee bricks, hedgehog connectivity measures and green and brown roofs / walls are also required. All new boundaries should be permeable for hedgehogs.
22. Respond to the site's location within the SAC Bat consultation zones (Greater Horseshoe Bat A; Lesser Horseshoe Bat B) including avoiding direct or indirect loss of and/or harm to juvenile foraging habitats and the retention, protection and/or provision of key commuting and foraging habitats for wider SAC bat populations.

Air quality

23. An air quality assessment is required to assess the effect of the development on pollutant concentrations to ensure there is no detrimental impact. The assessment will need to include the cumulative impacts of nearby sites and provide air quality mitigation measures to ensure no increase in pollutant concentrations at the site or at nearby sensitive locations.

Design quality and placemaking principles

Development proposals will:

24. Be informed by a comprehensive understanding of the sensitive heritage and landscape context in which the area sits, including undertaking a detailed historic environment assessment, to include further assessment of archaeology and the effects of development proposals on the double-inscribed World Heritage Site and the setting of the Cotswold National Landscape, and undertake detailed evaluation and assessment, in order to inform design and to identify and implement appropriate mitigation.
25. Be informed by a comprehensive Landscape Visual Impact Assessment, taking into consideration potential impact on the setting of the Cotswold National Landscape and the setting of the World Heritage Sites, and other sensitive landscape features. Mitigation across the site will include:
 - g) An enhancement of the well treed frontage of the site with the A367 using large growing species to provide both GI nature-based solutions and structural landscaping to break up extensive massing of buildings.
 - h) development to be of low height, using appropriate materials, screened from the Cotswolds National Landscape to the south and minimises any impact on the World Heritage Site setting.
26. Evaluate the potential for archaeological remains across the development site and ensure appropriate mitigation where required.
27. Ensure that light spill is reduced to a minimise impacts on dark skies, on important views and bat corridors.

Delivery and Implementation

28. In formulating plans for development, adjoining landowners, developers or promoters are expected to work collaboratively to ensure that the development of their sites is complementary.
29. Given the site's sensitive heritage and landscape context, its prominent position along a key transport corridor, and the requirement to integrate parcels in multiple ownerships, development proposals shall be subject to independent design review prior to submission.

West of Bath

- 2.137 The West of Bath area is one of the locational options that has been considered to help address the development needs of Bath and it was included in the Local Plan Options consultation.
- 2.138 It was identified as an ideal location within close proximity to the city to provide around 2,000 homes as well as employment uses. Development was envisaged to 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 would 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.
- 2.139 Whilst development in this location would undoubtedly deliver public benefits and help to address objectively assessed housing and other economic needs, this had to be weighed against the substantial harm that development would cause to the dual inscribed World Heritage Site and impacts on the setting of the Cotswolds National Landscape.
- 2.140 A Landscape and Historic Environment assessment of this area was undertaken as part of the Evidence Base to inform the Local Plan. The assessment identified that 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.
- 2.141 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.
- 2.142 To progress this development location through the Draft Local Plan, the Council would need to demonstrate that the public benefits of this proposal would outweigh the substantial harm. Given the technical assessment undertaken, the national policy context, as well as responses to the options consultation from statutory heritage advisers, the West of Bath site is not allocated for development in this Local Plan.

2.143 However, it is considered that the wider area to the West of Bath does have potential for longer-term development as part of a strategy to enable the growth needs of the city to be met sustainably. This potential will be explored as part of the longer-term strategy being established through the WECA Spatial Development Strategy and preparation of a new-style Local Plan for B&NES. This course of action has strong political support within B&NES and will involve continuing dialogue with government and statutory heritage advisers, reviewing issues relating to harm to the WHS, and the public benefits of development in this location. This can then support a future allocation in the new style Local Plan.

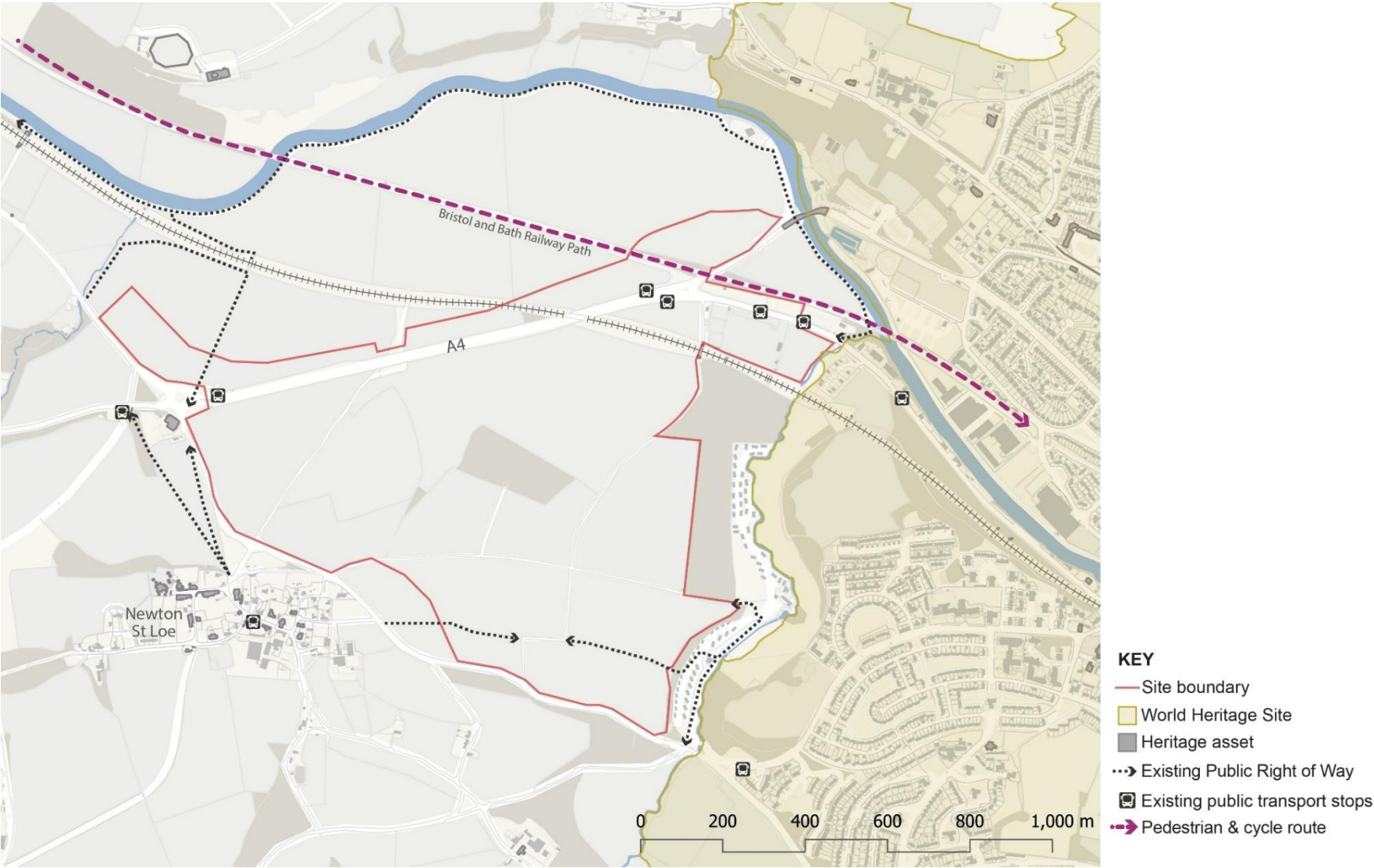


Figure 2.19: West of Bath

