

# Local Plan 2016-2036

## Issues & Options Consultation

Winter 2017



# Contents

## Contents

- 1. Introduction –1**
  - 2. Vision & Spatial Priorities –3**
  - 3. Spatial Strategy Options–9**
  - 4. Strategic Development Location: North Keynsham–15**
  - 5. Strategic Development Location: Whitchurch–20**
  - 6. Housing Needs And Student Accommodation–28**
- How To Get Involved & Consultation Exhibitions–32**

# 1. Introduction

## Setting the scene

1.01 Bath & North East Somerset Council is preparing a new Local Plan for its area which covers the period up to 2036. The Local Plan is principally concerned with the use and development of land.

1.02 The new Local Plan is being produced alongside the West of England Joint Spatial Plan. This also covers the period from 2016 to 2036, and provides the overarching strategic planning context for the four West of England local authorities of Bath and North East Somerset, South Gloucestershire, Bristol City Council and North Somerset. It focusses on establishing the housing requirement for the wider area and the job growth ambition, as well as a broad spatial strategy for accommodating growth

1.03 Alongside the Joint Spatial Plan the four authorities have prepared a West of England Joint Transport Study to identify key transport infrastructure measures required to support the growth.

1.04 The B&NES Local Plan will enable the delivery of the Joint Spatial Plan, and will respond to changed local circumstances and new national policy/legislation. It will encompass a strategy to guide development, provide a policy framework for specific site allocations and provide district-wide Development Management policies used in the determination of planning applications. The Local Plan is the means by which the Core Strategy review will be undertaken. Upon its adoption, the Local Plan will replace the Council's existing Core Strategy and Placemaking Plan.

1.05 The B&NES Local Plan will be supported by a range of evidence and the Council will work closely with communities and other stakeholders at various stages of the preparation process. Comments received on the Commencement Document, which was published in November 2016, have been considered. The Council's response to the key issues raised is outlined in the consultation statement.

## Purpose and scope of Issues & Options

1.06 The purpose and scope of the B&NES Local Plan is broad and so to help focus discussion and comment, and to better align with preparation of the Joint Spatial Plan, the Issues and Options consultation is being divided into two broad phases.

1.07 This document represents the first phase of the Issues and Options consultation (Phase 1a) and covers four broad areas:

1. Vision & Priorities – outlining the key challenges facing B&NES and the spatial priorities that the Local Plan should address
2. Strategy – within the context of the Joint Spatial Plan starting the conversation about possible alternative approaches to providing additional homes over and above those being provided in strategic development locations
3. Strategic Development Locations – presenting the emerging proposed approach to development at the strategic development locations at North Keynsham and Whitchurch and raising key questions & issues for discussion
4. University issues - as a key element of housing need initial consideration of University

expansion and possible approaches to providing student accommodation that will need to be considered within the context of the other development pressures and strategy for Bath

1.08 This Issues and Options document is supported by Background Papers explaining the emerging approach for these areas. A number of evidence studies supporting the document have also been published, including a Housing & Economic Land Availability Assessment.

## Issues and Options consultation – next steps

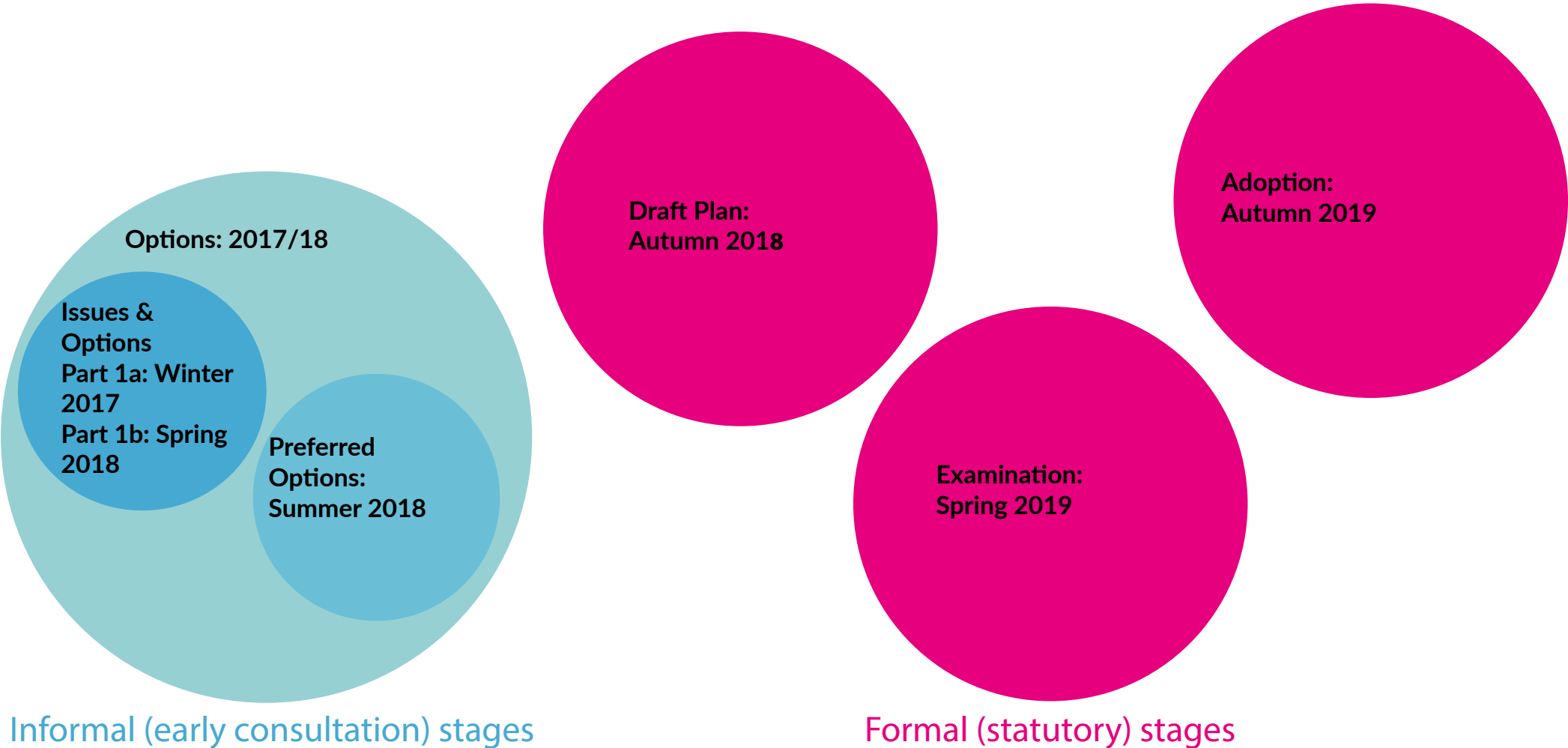
1.09 After this period of consultation there will be a further element of Issues and Options consultation (phase 1b) in spring next year. This will cover other place based issues and Development Management policies. Following consideration of comments on both these consultation phases, as well as further assessment work, the Council will publish its Preferred Options for consultation in summer 2018. This will encompass greater detail on the strategic development locations, as well as smaller site allocations.

1.10 The timetable for these stages of options consultation is represented in diagram 1 below.

## Timetable

1.11 Following extensive consultation on and discussion of options the Council will prepare a Draft Local Plan which will set out the proposed site allocations and policies. The Draft Plan will be subject to formal consultation prior to submission for Examination by a Planning Inspector. The currently anticipated programme for the preparation and adoption of the Local Plan is set out in the Diagram 1.

**Diagram 1: Local Plan consultation stages**



## 2. Vision & Spatial Priorities

### Setting the scene

2.01 In order to ensure an effective strategy, it is necessary to identify the critical issues which the Plan should address and the priorities for responding to these issues.

2.02 The adopted Core Strategy covers the period up to 2029. Its vision and strategic objectives need to be reviewed in light of changed circumstances, including the following:

- Changes in national context: a period of economic recession, followed by relative recovery and a still fragile economy has led to an increasing focus on promoting economic growth, diversity and resilience, as well as delivering new housing. The reduced level of government resources available has also resulted in a changed focus and way of doing things for public sector organisations, including the Council.
- Key challenges facing B&NES: updated information on the key challenges facing the area and its communities now and over the next 20 years.
- Whilst being more specific to B&NES, the Local Plan priorities will need to align with West of England Joint Spatial Plan vision and priorities for the wider sub-region.
- Council corporate strategy & priorities: these reflect the key challenges and changing context within which the Council operates and influence the spatial priorities of the Local plan. The Council's four key priorities (2016-2020) are illustrated in Diagram 2.

### A vision for B&NES

2.03 The JSP sets out a vision for the West of England which focusses on the area being a fast growing and prosperous region with a rising quality of life for all. Environmental character is central to this prosperity and the need to ensure that patterns of development and transport are sustainable and resilient to and reduce impact on climate change.

### B&NES Vision

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

2.04 Within this framework, the Council's corporate 2020 vision is proposed to be taken as the Local Plan vision. This will help to ensure the Local Plan, as a key corporate strategy, helps to deliver the Council's wider aspirations.

Diagram 2: Corporate Priorities



## Key challenges & spatial priorities

### Critical issues

2.05 Drawing on the Sustainability Appraisal Scoping Report and other evidence, the key challenges facing B&NES are suggested in the table opposite.

2.06 As the Local Plan is able to influence spatial outcomes (changes to the use of land and buildings) a set of spatial priorities are suggested below to address these key challenges. The critical issues and priorities identified in the JSP also need to be taken into account and reflected in the Local Plan spatial priorities (see section 3).

2.07 The spatial priorities often inter-relate e.g. prioritising greater walking or cycling helps to address climate change issues, as well as increasing physical activity thereby addressing health priorities. The direct relationship between the spatial priorities outlined below to the Council's four corporate priorities is also referenced to illustrate how the Local Plan and the planning system will help to deliver the Council's broader aspirations.

2.08 The Local Plan's policy framework, including development site allocations, needs to help achieve the identified spatial priorities. In some instances there may be conflict between different priorities and as such 'trade-off' or a balancing process may be necessary. At this stage of Local Plan preparation the Council is outlining a series of options which will need to be tested against the extent to which they achieve one or more of the spatial priorities.

2.09 The Council is seeking your views on the spatial priorities set out.

## Suggested Critical Issues

### Changing local population & housing needs:

- Housing affordability crisis across B&NES and lack of social housing
- Significant increase projected in younger and older age groups
- Considerable recent & projected student population growth
- Increase in the number of second homes in parts of B&NES

### Health

- Health & life expectancy inequalities across B&NES
- 60% of adults over-weight or obese
- Poor air quality in parts of B&NES leads to health problems

### Climate change

- Climate change impacts already being felt both globally & locally
- Technological advances create opportunities for low or zero carbon development

### Economy

- Below average productivity levels & earnings in B&NES
- Retaining an adequate supply of employment land & premises in key strategic locations
- Inequality of employment opportunities

### Environment

- High quality natural, built & historic environment requiring protection and enhancement
- Threat to environment & need for and maintenance of additional green infrastructure arising from development & other pressures

### Transport & Infrastructure

- Severe traffic congestion in some parts of B&NES
- Poor accessibility to national/regional transport network
- Difficulties of providing infrastructure capacity to cope with increasing population

### Financial changes

- Increased pressure on limited public sector resources to meet current & projected Financial changes
- Increased pressure on limited public sector resources to meet current & projected demands

## QUESTIONS

Q1: Have we identified the critical issues facing the District over the next 20 years?

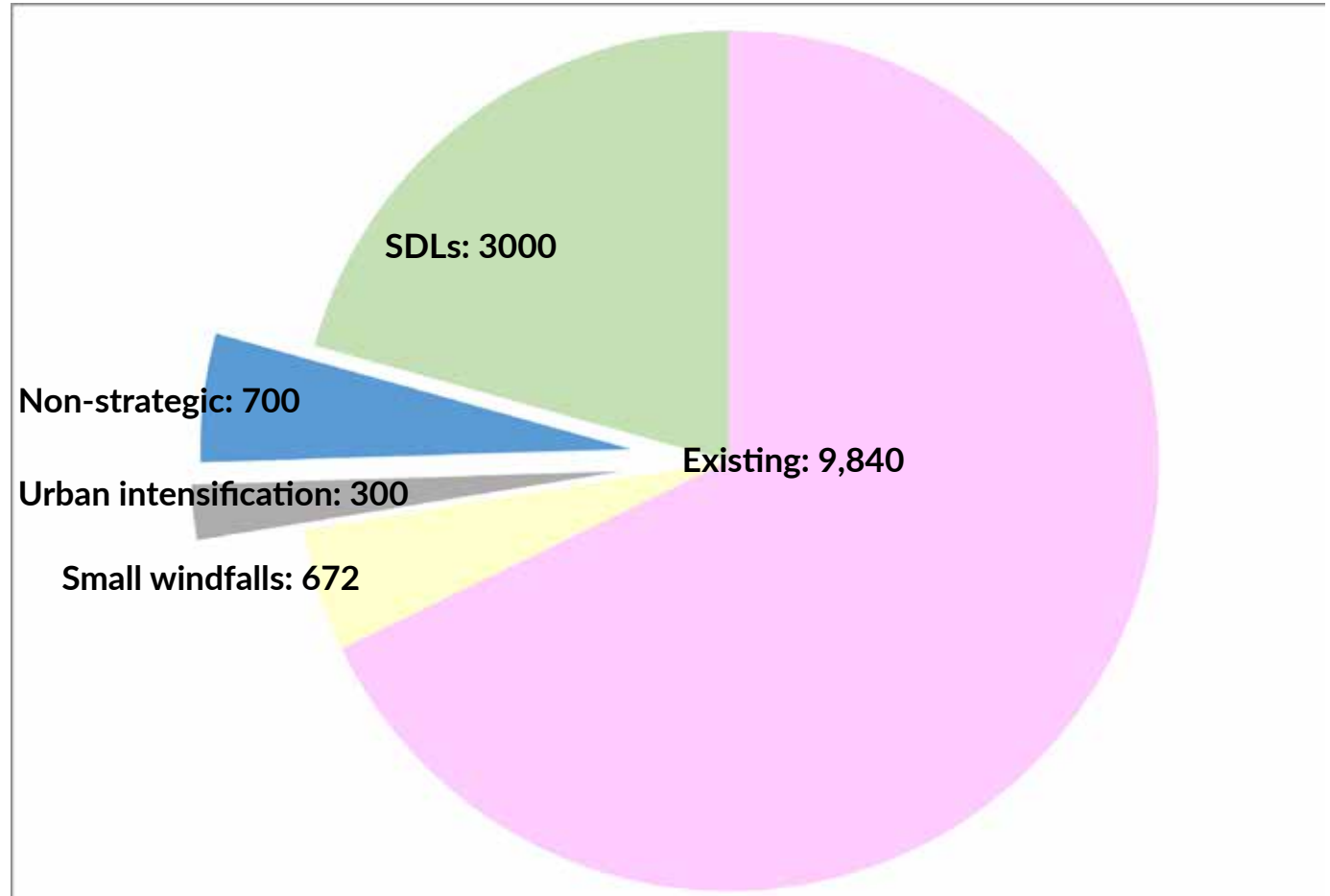
Q2: Are the suggested spatial priorities the right ones?

## The Joint Spatial Plan

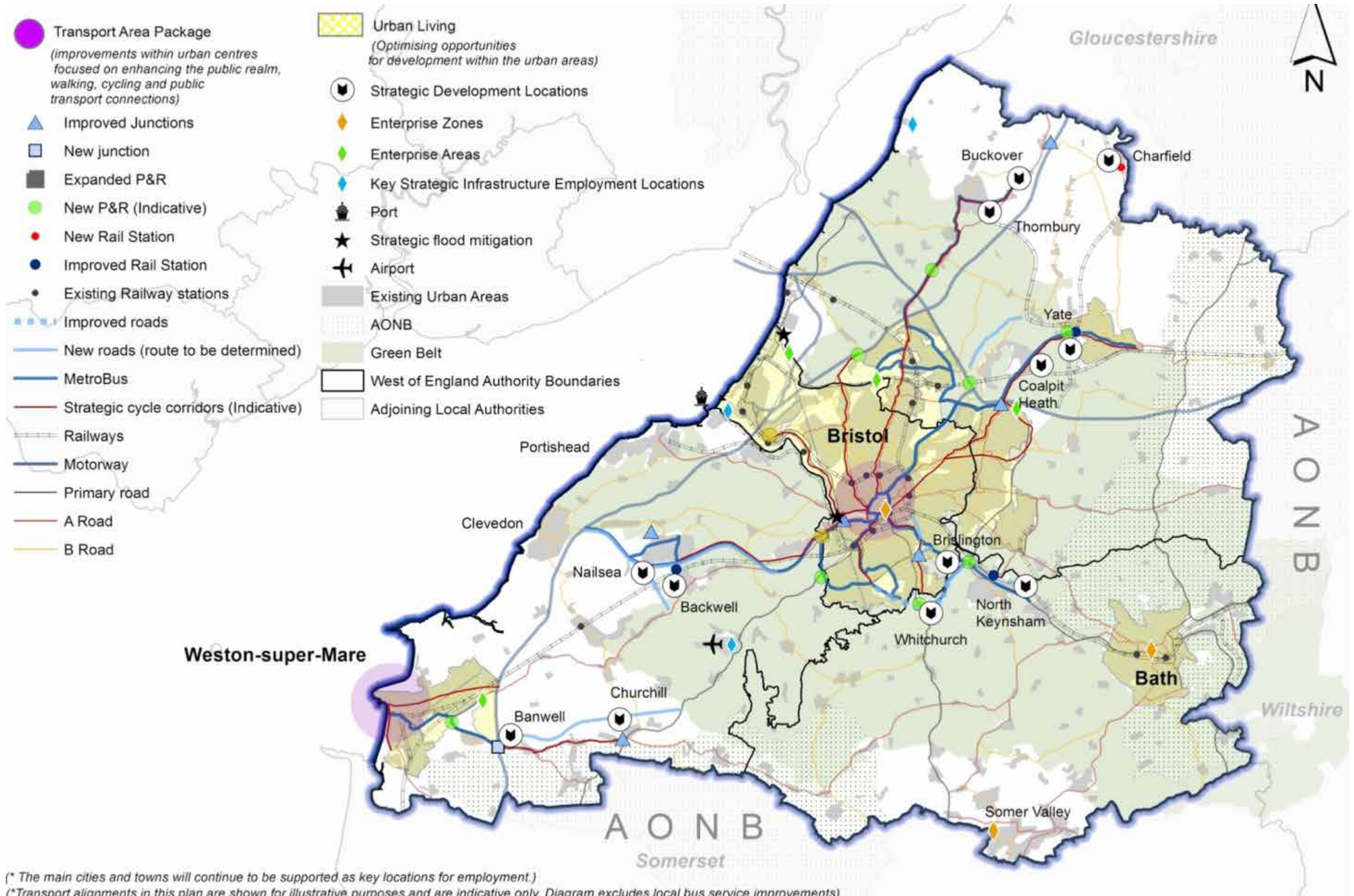
2.10 The overarching proposals for B&NES arising from the Joint Spatial Plan are illustrated in the key Diagram 4 and the housing requirement in the pie chart to the right.

2.11 The New Local Plan must conform with the Joint Spatial Plan, although it is acknowledged that the Joint Spatial Plan could be amended through the examination process. Therefore the new B&NES Local Plan will not be finalised until the outcome of the examination is clear.

Diagram 3: The JSP Housing Requirement for B&NES



**Diagram 4: JSP Key Diagram**



(\* The main cities and towns will continue to be supported as key locations for employment.)  
 (\*Transport alignments in this plan are shown for illustrative purposes and are indicative only. Diagram excludes local bus service improvements)



Spatial Priorities	Council's Corporate Priorities
<p>1) Cross cutting objective: Pursue a low carbon and sustainable future in a changing climate</p> <ul style="list-style-type: none"> <li>• Reducing the need to travel and encouraging sustainable travel through the location and layout of development</li> <li>• Encouraging increased renewable and low carbon energy generation</li> <li>• Promoting sustainable and energy efficient design &amp; construction</li> <li>• Minimise vulnerability and provide resilience to impacts of climate change e.g. flood risk</li> </ul>	1,2
<p>2) Protect and enhance the District's natural, built and cultural environment and provide green infrastructure</p> <ul style="list-style-type: none"> <li>• Ensuring growth &amp; development takes place within the environmental capacity of the District, including prioritising the optimal use of brownfield sites</li> <li>• Maintain and enhance functional and connected high quality GI networks (helps tackle impacts of climate change, sustainable water management, deliver healthy lifestyles, improve local sense of place and attract investment)</li> <li>• Establish and maintain coherent and resilient ecological networks</li> </ul>	1,2,3
<p>3) Facilitate a strong, productive, diverse and inclusive economy</p> <ul style="list-style-type: none"> <li>• Maintain/plan for an appropriate supply of business land and premises in sustainable locations across B&amp;NES that are suitable for &amp; attractive to businesses, focusing on the Bath &amp; Somer Valley Enterprise Zone</li> <li>• Capitalise on innovation opportunities and facilitate growth in knowledge-based high value added sectors</li> <li>• Maintain &amp; enhance city, town, district and local centres as important and vibrant commercial areas</li> <li>• Maintain a strong visitor economy and a strong &amp; diverse retail sector</li> </ul>	1,3,4
<p>4) Meet housing needs arising from a changing and growing population</p> <ul style="list-style-type: none"> <li>• Plan for the delivery of sufficient new homes to meet evidenced needs arising from demographic changes and to support economic development</li> <li>• Facilitate the sustainable provision of accommodation that meets a range of specific needs e.g. older people, young people and those on lower incomes</li> <li>• Enable the most efficient use of the existing housing stock to meet the range of accommodation needs</li> </ul>	1,2,3

<p>5) Plan for development that promotes health and well being</p> <ul style="list-style-type: none"> <li>• Facilitate healthier lifestyles including active modes of travel</li> <li>• Promote/deliver local employment, training &amp; regeneration opportunities contributing to reducing health &amp; social inequalities</li> <li>• Ensuring access to sufficient health facilities for new development (e.g. through provision of social/physical infrastructure)</li> <li>• Reduce risk of hazards to human health including flood risk, improving air quality and designing out crime</li> </ul>	2,4
<p>6) Deliver well connected places accessible by sustainable means of transport</p> <ul style="list-style-type: none"> <li>• Reduce the need to travel and encourage greater use of public transport, walking and cycling through the location and design of new development</li> <li>• Help to manage congestion through the location and form of development</li> <li>• Ensure development helps to provide high quality and attractive public transport and walking &amp; cycling routes</li> <li>• In conjunction with strategic plans/initiatives covering the wider area facilitate enhanced accessibility to and within the District, including rural areas</li> </ul>	1,2
<p>7) Ensure the timely and efficient provision of infrastructure to support growing communities</p> <ul style="list-style-type: none"> <li>• Direct development to those locations well served or capable of being well served by infrastructure in a cost-effective &amp; efficient manner</li> <li>• Ensure the alignment of the development of new housing with the provision of all necessary infrastructure</li> <li>• Facilitate investment in improving social &amp; recreational infrastructure</li> </ul>	1,2,3,4

Note Council's Corporate Priorities: 1 = A strong economy and growth; 2 = Focus on prevention; 3 = A new relationship with customers & communities; and 4 = An efficient business

# 3. Spatial Strategy Options

## Setting the scene

3.01 Alongside the existing commitments, much of the housing growth will be accommodated in the Strategic Development Locations at Whitchurch and North Keynsham and through Urban Intensification in Bath. However, the new Local Plan has a key role in establishing how the 'non-strategic growth' of around 700 new dwellings will be delivered. This figure is in addition to the existing Core Strategy growth requirement and effective from 2016 (the start of the new Local Plan period).

3.02 The approach to development outside Bath and the two JSP Strategic Development Locations will relate to the sustainability of locations in terms of access to employment opportunities, facilities and services, as well as to public transport and the ability to meet infrastructure requirements effectively.

3.03 The Green Belt is a significant constraint on the location of development in the District. Exploring most sustainable locations will also mean considering whether exceptional circumstances exist to warrant removing land from the Green Belt to meet local needs. Options to avoid the loss of Green Belt must be considered first.

3.04 The level of development that rural settlements will be asked to accommodate will therefore depend on a number of factors including access to local schools, services, facilities, employment opportunities, public transport, and infrastructure and environmental constraints as well as Green Belt policy (see above).

## Sites and locations

3.05 As part of reaching a preferred approach for accommodating non-strategic growth, the following issues are being investigated:

- The availability of suitable and deliverable brownfield sites in Keynsham, the Somer Valley and other sustainable locations
- Whether there are any available suitable and deliverable greenfield sites on the edge of the Somer Valley settlements and the rural villages not subject to Green Belt policy
- Whether there is scope and the exceptional circumstances to release land from the Green Belt: from the inner Green Belt boundary at Bath, Keynsham and other Green Belt insets settlements e.g. Saltford, Batheaston, Bathampton, Bathford and Farmborough.

3.06 Investigations are ongoing and iterative. Work on investigating suitable sites and locations is being undertaken in collaboration with Town and Parish Councils. This will be informed by the assessment of the sites in Housing and Economic Land Assessment (HELAA). Following consultation on the strategy options the Council will consult on potential site allocation options next year.

3.07 Diagram 6 illustrates the current level of key services and facilities at each settlement outside the main urban areas including access to local schools, employment opportunities, and public transport provision. This indicates that whilst some settlements are located on or near routes with a good public transport service, much of the District is inadequately served and largely car dependent for access to key services and facilities.

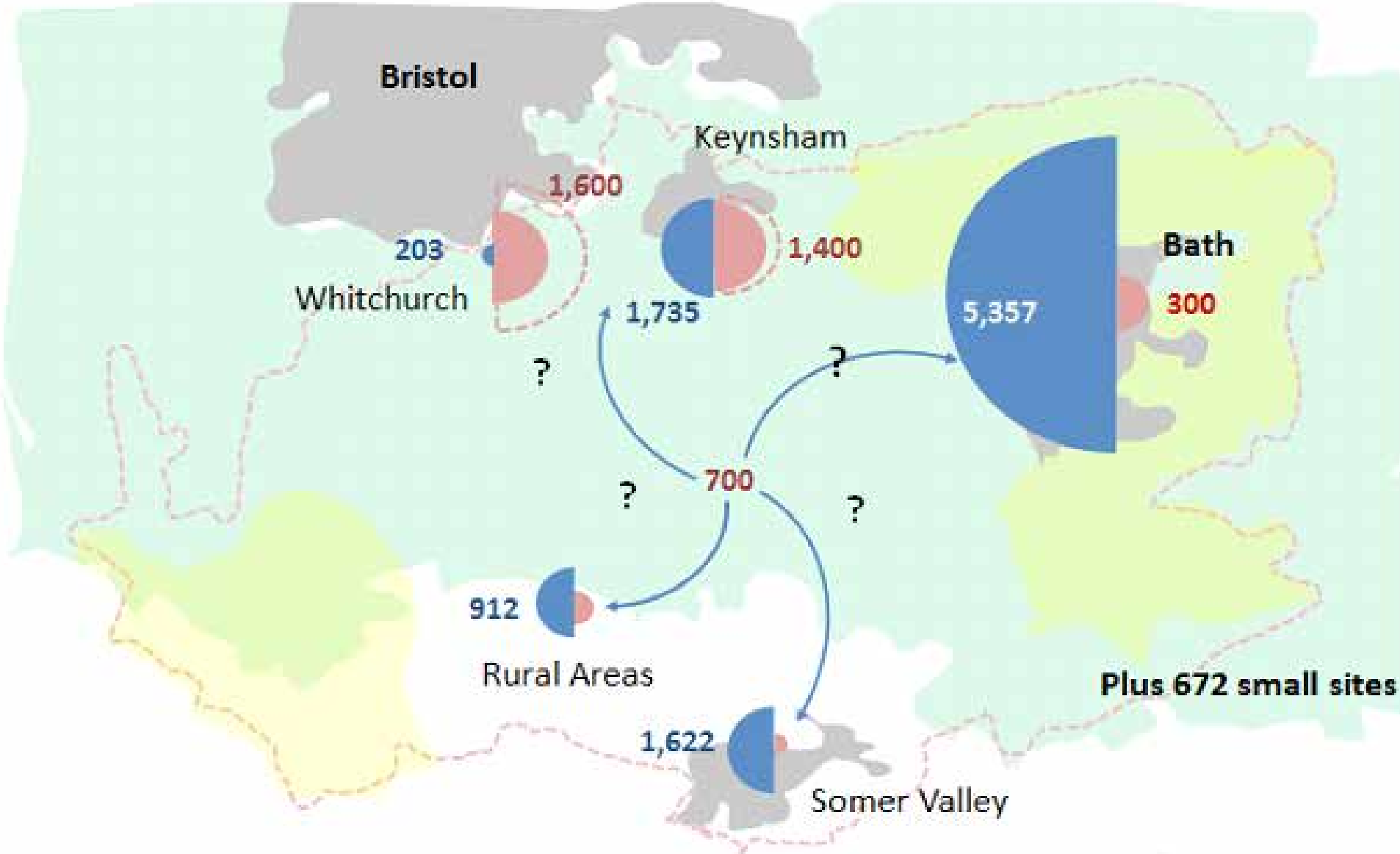
3.08 Given that one of the key sustainability

related and infrastructure requirements for housing proposals in villages outside the Green Belt is the existence of a primary school (as reflected in current policy), diagram 6 provides a snap-shot of which schools are currently at capacity and/or have no physical scope to extend plus those schools predicted soon to be at capacity (spaces to be filled with children arising from approved residential proposals) and with no further physical scope to expand. This is likely to have an impact on whether further residential development can be accommodated even in those settlements with a good level of services and facilities.

3.09 Diagram 7 indicates the physical extent of the Green Belt in B&NES. There are currently five villages 'inset within the Green Belt' (Bathampton, Batheaston, Bathford, Saltford, Farmborough and Whitchurch). It should be noted that Whitchurch is identified as a Strategic Development Location and therefore will not be expected to contribute to the non-strategic growth requirement.

3.10 There are also a number of villages 'washed over' by the Green Belt which have a 'good' or 'reasonable' level of key facilities and services and in other circumstances could be considered as potentially suitable locations for more than just limited infill.

Diagram 5: Existing Housing Commitments and JSP Requirements



B&NES Housing Provision- 14,500 dgs  
AH Target - 3,100 dgs

Existing Supply  JSP

## Planning for non-strategic growth – the options

3.12 There are a number of broad spatial scenarios to be explored before agreeing the preferred approach for accommodating non-strategic growth. Such scenarios will be driven by the outcomes sought in the Vision and Spatial Priorities.

3.13 In all the scenarios presented below no sites would be allocated in the Green Belt (including in villages washed over by the Green Belt) unless it can be demonstrated that exceptional circumstances exist to justify removing land from the Green Belt and there is not sufficient capacity in sustainable locations on land outside Green Belt.

3.14 Provision of housing under any of the suggested approaches will include affordable housing to meet demonstrated needs. The approach to rural affordable housing will be considered through the next stages of Local Plan preparation.

3.15 Three broad options have been identified but others, or a mixture of these three, might constitute the preferred strategy.

### Option 1 - Continue the existing hierarchical approach

3.16 This is where new development will be directed to the most sustainable locations outside the Green Belt where access to employment opportunities, facilities and services, as well as to public transport is best.

3.17 This could include locations on the edge of Bath; and at Keynsham; Midsomer Norton, Radstock and Westfield in the Somer Valley,

then the larger villages (with a primary school with capacity/scope to expand).

3.18 Beyond that, certain larger settlements outside the Green Belt with access to key facilities and services (including a primary school with capacity/scope to expand) and public transport could also be accommodate a proportion of the growth with other smaller non-Green Belt villages accommodating a lower proportion of the growth.

3.19 The drawback of this approach is that it can lead to some dispersal of development resulting in increased commuting and difficulties in providing infrastructure.

### Option 2 - Focussed approach

3.20 In this scenario, all non-strategic development could be focussed at a few key locations, such as on the edge of the towns; or at two or three of the larger villages. These could act as the focal points for future housing development without the need to allocate sites at the smaller less sustainable settlements.

3.21 The benefits of this approach are that it could help to facilitate investment in infrastructure such as schools or open space. However the impact of these levels of growth on a village could be relatively significant.

### Option 3 - Dispersed approach

3.22 A more dispersed approach would mean allowing a range of smaller sites across the District at a greater range of settlements, large and small. This could include sites at all settlements outside the main urban areas. However, this approach is likely to result in increased levels of travel by car, placing additional pressure on

an already congested transport network and additional school transport costs.

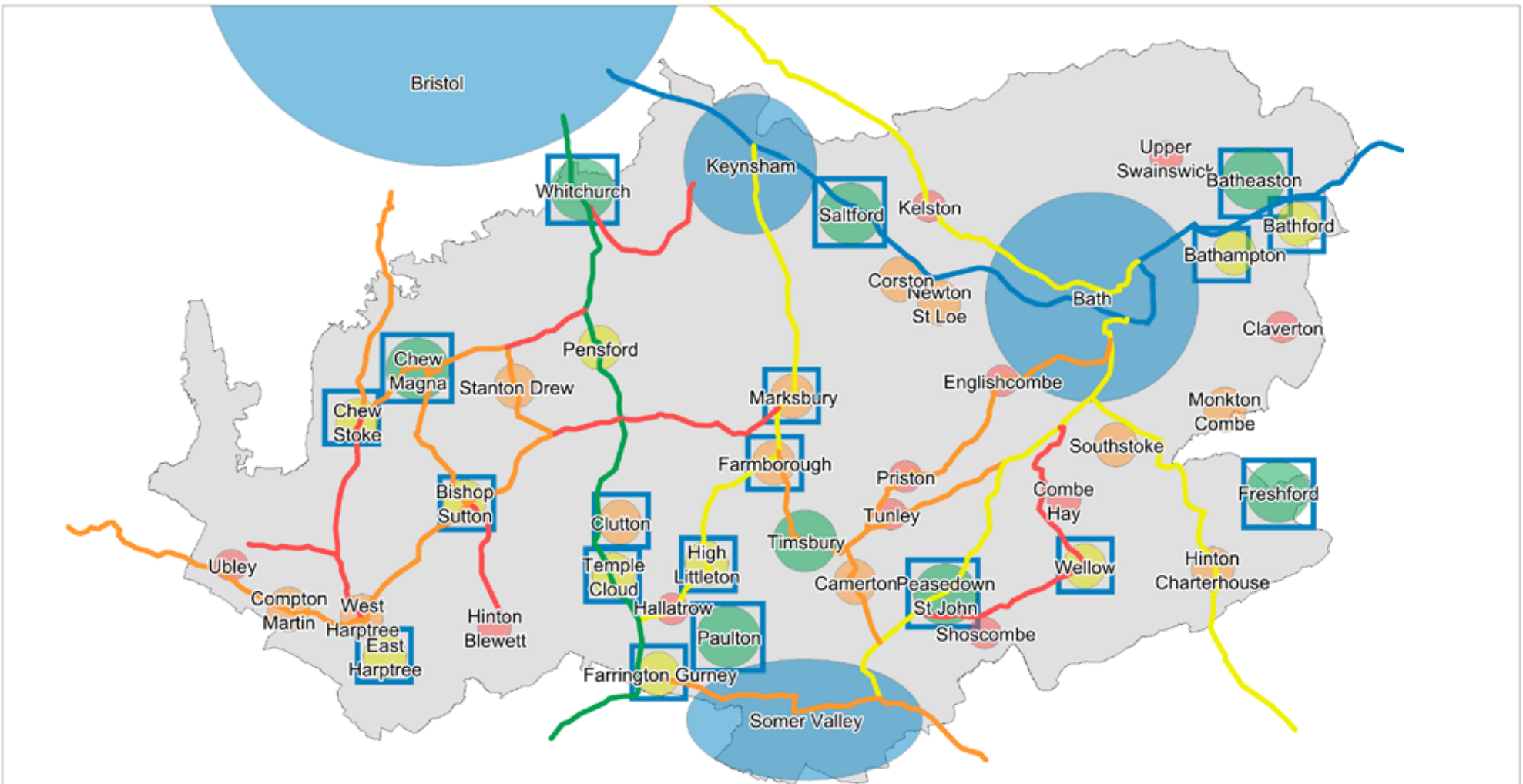
3.23 Diagrams 8 illustrates examples of what such strategies could entail. Please note these are illustrative and are not the Council's strategy. The Council will consider the evidence and comments received and formulate the most appropriate strategy at a later stage in the process

### QUESTIONS:

Q1: Which of the three scenarios do you think best addresses the need to accommodate non-strategic growth? Please give reasons for your answer.

Q2: Are there any other approaches/scenarios you think should be considered for accommodating non-strategic growth in B&NES? Please give reasons for your answer.

Diagram 6: Services and Facilities in Rural Settlements and Public Transport Provision



*The diagram illustrates the current situation and circumstances in individual villages may change.*

**Legend**

Grey outline: Bath & North East Somerset boundary

**Primary Schools:**

Blue square: At capacity and no scope to extend

**Access to key services and facilities:**

- Blue circle: Main urban areas
- Green circle: Broad range
- Yellow circle: Medium range
- Orange circle: Limited range
- Red circle: Very limited range

**Public transport provision:**

- Blue line: Very frequent
- Green line: Frequent
- Yellow line: Reasonable
- Orange line: Limited
- Red line: Very limited

Diagram 7: Green Belt Villages

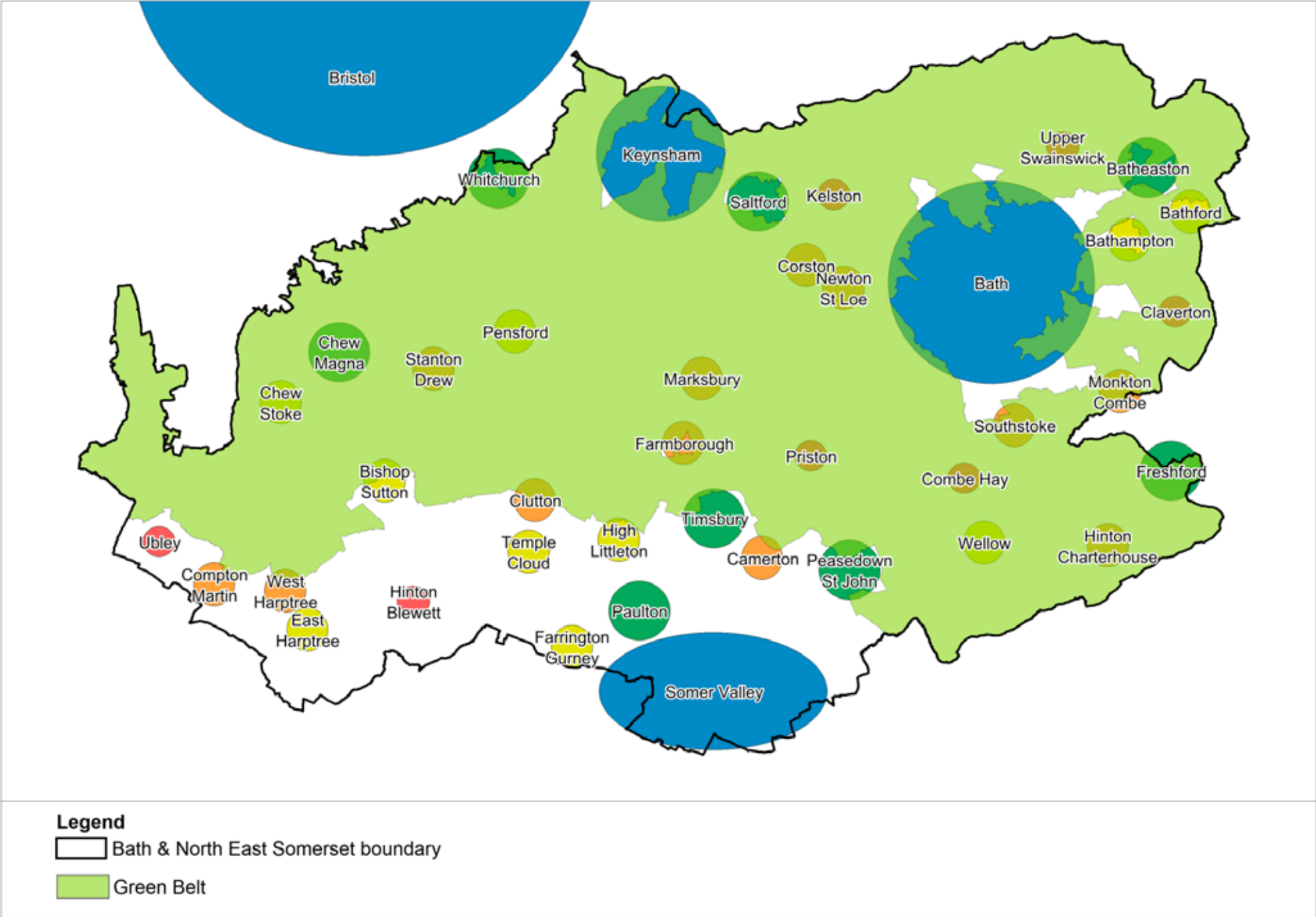
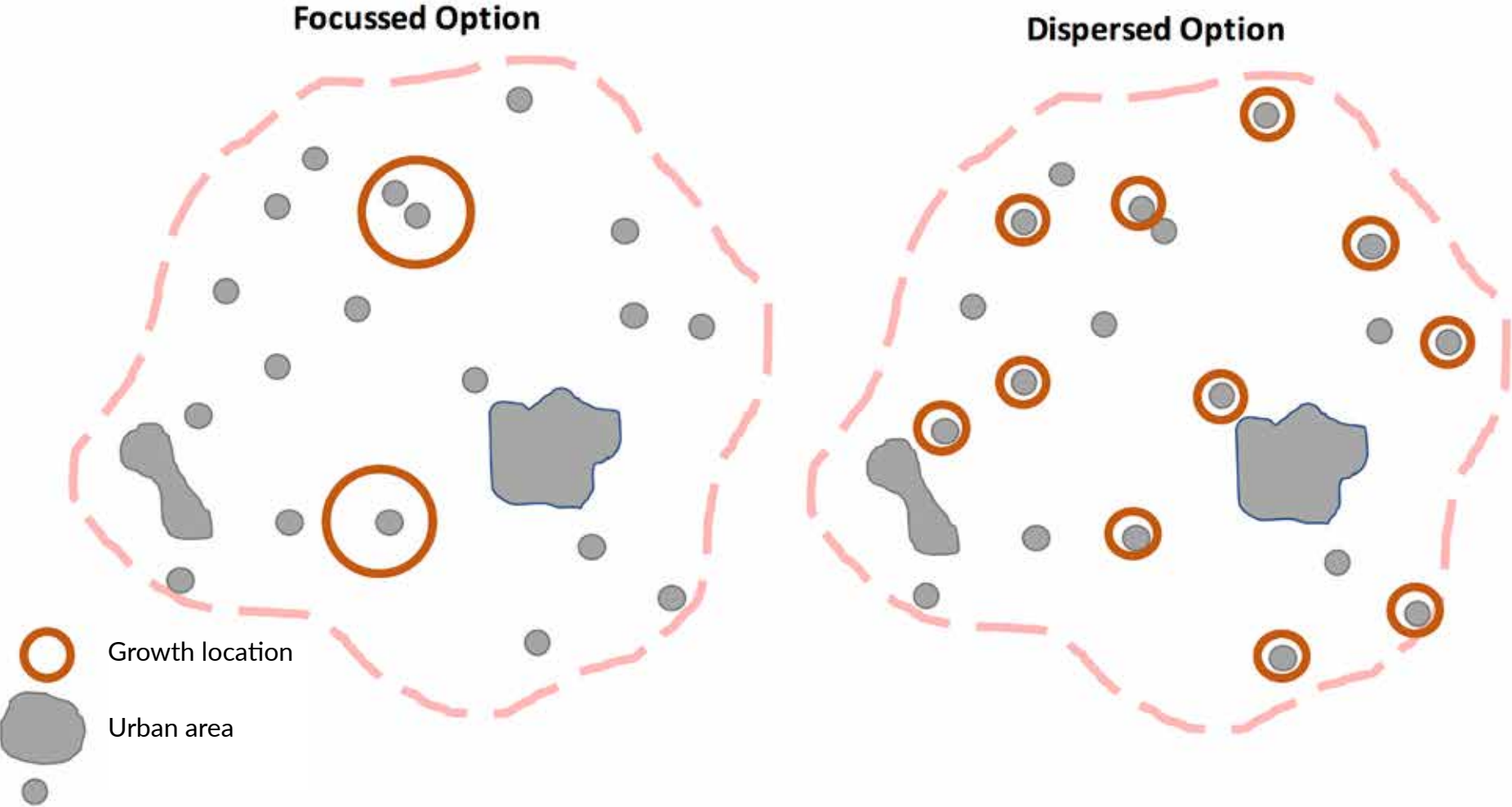


Diagram 8: Example Spatial Strategy Options





# 4. STRATEGIC DEVELOPMENT LOCATION: NORTH KEYNSHAM

## INTRODUCTION

### Site context

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

### Joint Spatial Plan context

4.02 The site is identified within the Joint Spatial Plan as a Strategic Development Location, one which is capable of delivering large scale development which supports the spatial strategy in a sustainable way. Policy 7.1 of the Joint Spatial Plan sets out the bespoke requirements for the site. This forms the starting point for detailed assessment and allocation within the Local Plan.

4.03 In summary the Joint Spatial Plan for North Keynsham requires the development of **1,500 new homes** (including affordable housing provision), **50,000sqm of employment floorspace** (which could provide around 1,600 jobs), **a new school, local centre** and potential for a new **marina**. The development will require the completion of **key transport** infrastructure before the housing development starts including the **North Keynsham multi modal link road** from Avon Mill Lane to the A4, **Keynsham rail station improvements** and a **Metrobus** (high quality public transport) route from Bristol to Keynsham on the A4 corridor. Other transport requirements include **pedestrian and cycle connections** (including to the Bristol to Bath cycle path), a **high frequency local bus service** through the site and off site junction improvements.

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



View from Cotswolds

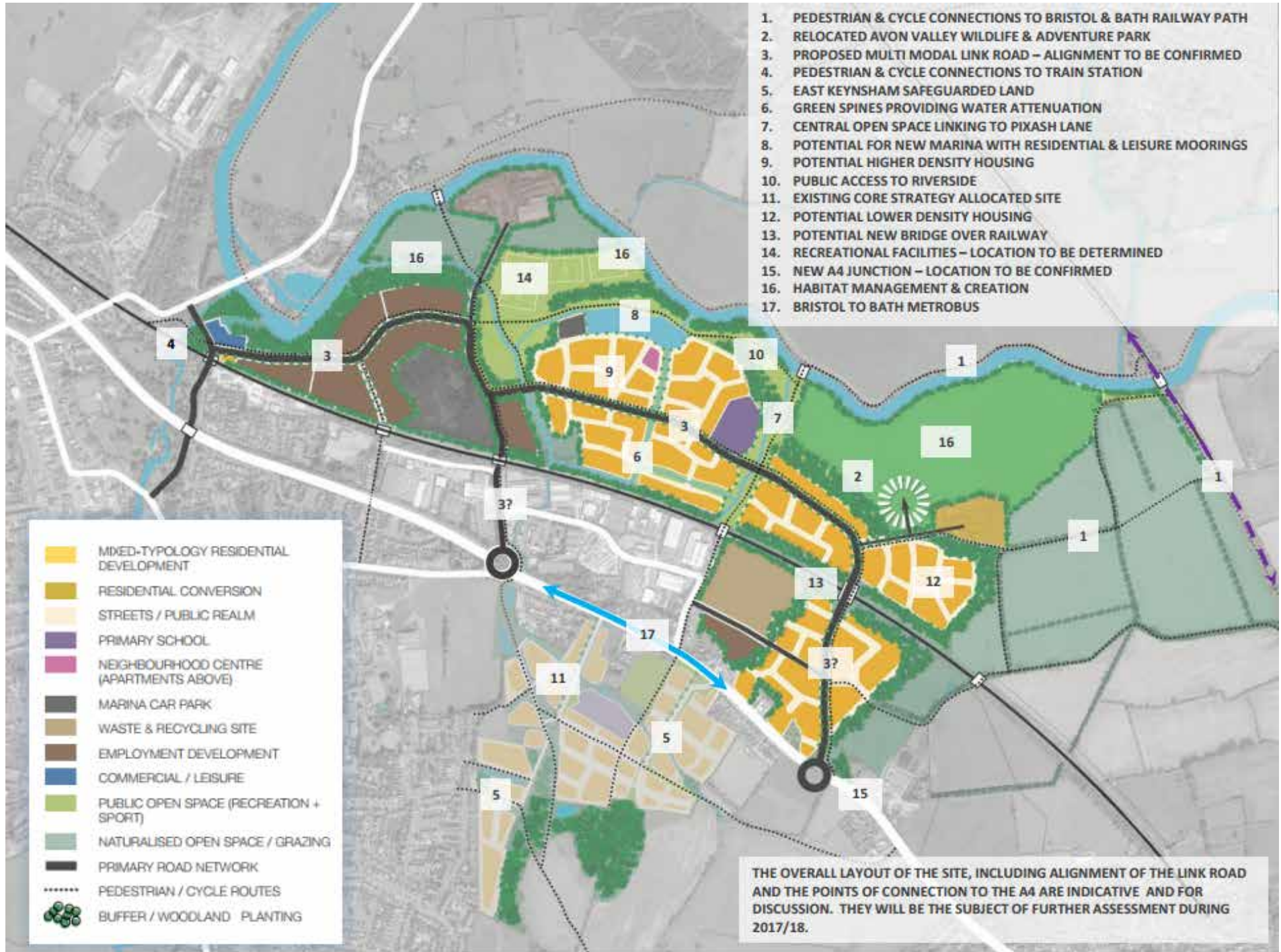


View from Pixash Lane Bridge



View of Paper Mill

Diagram 9: North Keynsham



## EVIDENCE BASE

4.05 The Council has produced a Strategic Planning Framework for the location. This is the primary piece of evidence that underpins the identification of the site as a Strategic Development Location and should be read in conjunction with this consultation document. It demonstrates the potential for a high quality extension to Keynsham which responds to the strong landscape setting. This includes residential-led development focused around a new marina with supporting neighbourhood centre and primary school. Mixed employment development is included with extensive green infrastructure across the site. Diagram 9 is a Concept Diagram based on the Strategic Planning Framework in conjunction with the existing masterplan for the East Keynsham Safeguarded Land. Other pieces of evidence have been completed or are ongoing, including transport infrastructure, landscape, development viability and odour assessments. Your input will inform the next stages of policy formulation.

### QUESTION

1a Have we considered all the issues?

1b What other evidence do you think we need to consider?

## VISION AND OBJECTIVES

4.06 It is important to create a vision for North Keynsham as this will form the foundation of the Local Plan allocation and the subsequent development and type of place that is created. The vision describes the kind of place the area should become and what is needed physically, economically and socially. It will help to shape what happens on the site, giving it coherence and a real sense of identity and place. The vision is accompanied by a set of objectives which are set out in the Strategic Planning Framework.

### Proposed vision

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

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

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

## QUESTION

The vision will be tested and expanded through the plan making process, particularly as the needs of stakeholders and partners are understood with increasing clarity.

2a What are your views on the vision and objectives?

2b What type of place should be created here?

## THE CONCEPT DIAGRAM

4.07 The Concept Diagram (Diagram 9) has been developed from site analysis, the proposed vision and objectives and key urban design principles. It has been adapted from the Strategic Planning Framework and the existing East Keynsham masterplan to illustrate the possible extent of where development might take place (and where it might not). It provides a high level layout and an indication of site capacity. It has been structured to optimise residential and employment development, balanced against the flood risk, landscape sensitivity constraints and the limitations of buffer zones surrounding major utility pipelines. **The Concept Diagram is indicative at this stage.** The point of this Local Plan consultation phase is to explore potential options and encourage and stimulate further discussion and debate. We value your feedback on the Concept Diagram and key issues that it raises.

## KEY ISSUES AND OPTIONS

4.08 The Concept Diagram and Strategic Planning Framework raise a number of key issues that we would like to test through this public consultation:

## Link road alignment

4.09 Access to the northern part of the site is significantly constrained by the railway, the River Avon and by associated capacity constraints on the A4 and connecting roads. Existing lanes through the site are narrow and have constrained crossings of the railway. At present there is no public transport connectivity to the northern part of the site with the nearest services running along the A4 and Keynsham Road. While the site is close to Keynsham Rail Station, pedestrian and cycle access from the site is poor and indirect. The JSP Policy requires a series of strategic infrastructure improvements to be made to the transport network, including the highway, public transport, cycling and walking networks.

4.10 The key part of this strategy is the Avon Mill Lane to A4 Multi Modal Link Road which is required to be built before any dwellings are complete. **The Link Road has to serve two purposes:** it is needed in order to help reduce traffic currently travelling through Keynsham Town Centre, and it also has to access and serve the new development. **The Concept Diagram shows an indicative alignment** through the middle of the site which includes a new railway crossing east of Pixash Lane and options to join the A4 at a new junction and at Broadmead roundabout. **The road alignment and the points at which it joins the A4 are subject to further assessment work which will be complete by spring 2018.**

4.11 Through the site the route should be of an appropriate nature for a mixed-use environment and be designed to passively restrict vehicle speeds while working as a public transport and cycle corridor. Subject to where and how the link road connects to the A4 the

Strategic Planning Framework proposes that some of the existing crossings over the railway line could be downgraded for use of pedestrians and cyclists.

### QUESTION

3a What do you think of the proposed road alignment?

3b Do you have any views on the existing crossing points? Have you got any thoughts on the overall movement strategy?

## Internal street network and wider connections

4.12 The development proposes to adopt a simple, permeable and highly connected street network based on a strong street hierarchy. This would support sustainable and healthy transport options by providing a walkable neighbourhood, strong safe links to the pedestrian and cycle network (including the Bristol to Bath cycle path) schools and facilities and to local public transport connections on the A4 and Keynsham Rail Station. There is potential for new bridge connections across the river to South Gloucestershire.

### QUESTION

4a What do you think of the proposed approach to the street network and wider connections?

4b Do you think it is important to create a healthy neighbourhood by encouraging walking and cycling?

## Landscape impact

4.13 The site is visible from the Cotswolds and in Landscape and Visual Assessment is considered to be part of a continuous swathe of open countryside from the Avon Valley towards the hills. The eastern and riverside areas of the site are considered to be the most visible and least appropriate for development. We propose to respond to this by requiring lower density housing at the eastern edges where the visual impact will be greatest, with the edges of the developed areas also planted up with bands of woodland to around 30m depth to provide visual screening and privacy for residents. The riverside area would remain undeveloped and has significant potential to be made more publicly accessible and enhanced as both an amenity and environmental asset, linked into a wider green infrastructure network across the site. There is significant potential across the site to restore and re-create habitats and biodiversity, including new wetland features, restored floodplain meadows and new woodland.

### QUESTION

5a What do you think of the proposed response to landscape impact, especially considering views from the Cotswolds?

5b How can we improve the Green Infrastructure network through the site?

## Housing mix

4.14 In line with National Planning Policy Framework expectations we propose to plan for a mix of housing needs, including for older and disabled people, affordable housing and self-build and custom build development. This could help establish a strong and unique identity for the site.

### QUESTION

6a What should the housing mix comprise of?

6b Is there any scope for other forms of housing, for example student accommodation?

## Zero carbon development

4.15 Planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy infrastructure. The NPPF states that we should actively plan for new development in ways which reduce greenhouse gas emissions. In response, the JSP requires all new development to minimise energy demand and maximise the use of renewable energy, and where viable meeting all demands for heat and power without increasing carbon emissions. Through the production of the Local Plan, we will be investigating the potential for development at North Keynsham to be built to a Zero Carbon standard (net zero emissions from regulated and unregulated heat and power). If this is achievable, North Keynsham could become a beacon for sustainable development, and in the process provide a healthy environment and a low cost of living for its future residents.

### QUESTION

7a Do you agree with the principle of aiming for a Zero Carbon development?

7b How ambitious should we be? How do you think this aim could be achieved?

## Avon Valley Wildlife & Adventure Park

4.16 As an important local business and tourist attraction, an enhanced Wildlife and Adventure Park will be an integral part of the site. The main facilities are proposed to be relocated to the north-eastern end adjacent to Avon Valley Farm. These should be laid out to minimise visual impact on views from sensitive locations. Larger buildings and structures and any features such as parking should be appropriately screened using planting. Delivering access to the Bristol to Bath cycle path will be a key requirement.

### QUESTION

8a How can Avon Valley Wildlife & Adventure Park be best integrated into the new development?

8b What opportunities are there to minimise visual impact from the Cotswolds?

8c Do you agree with the requirement to link with the Bristol to Bath cycle path?

# 5. STRATEGIC DEVELOPMENT LOCATION: WHITCHURCH

## INTRODUCTION

### Joint Spatial Plan

5.01 As explained in the introduction to this document, the Joint Spatial Plan is the strategic overarching planning framework for the West of England up to 2036. It sets out how the development needs of the area, particularly for housing, jobs and infrastructure are to be met, alongside protecting and enhancing our unique and high quality built and natural environment.

5.02 The Whitchurch site has been identified as a Strategic Development Location, one which is capable of delivering large scale development which supports the spatial strategy in a sustainable way.

5.03 The Joint Spatial Plan contains a number of key policies that will apply to all development within the West of England area. It also contains a strategic policy for each of the Strategic Development Locations. Policy 7.1 relates to Whitchurch and can be viewed on the website.

5.04 In summary the Joint Spatial Plan Policy for Whitchurch requires the development of 2,500 homes (including affordable housing), the provision of new schools, local centres, employment space, and the completion of key transport infrastructure such as a link road connecting the A37 to the A4.

5.05 The development is also required to be of high quality design that promotes active travel, incorporates green infrastructure and responds appropriately to the setting of Maes Knoll, the Wansdyke and Queen Charlton Conservation Area, and protects the landscape character of Stockwood Vale.

### A new link road between A37 and A4

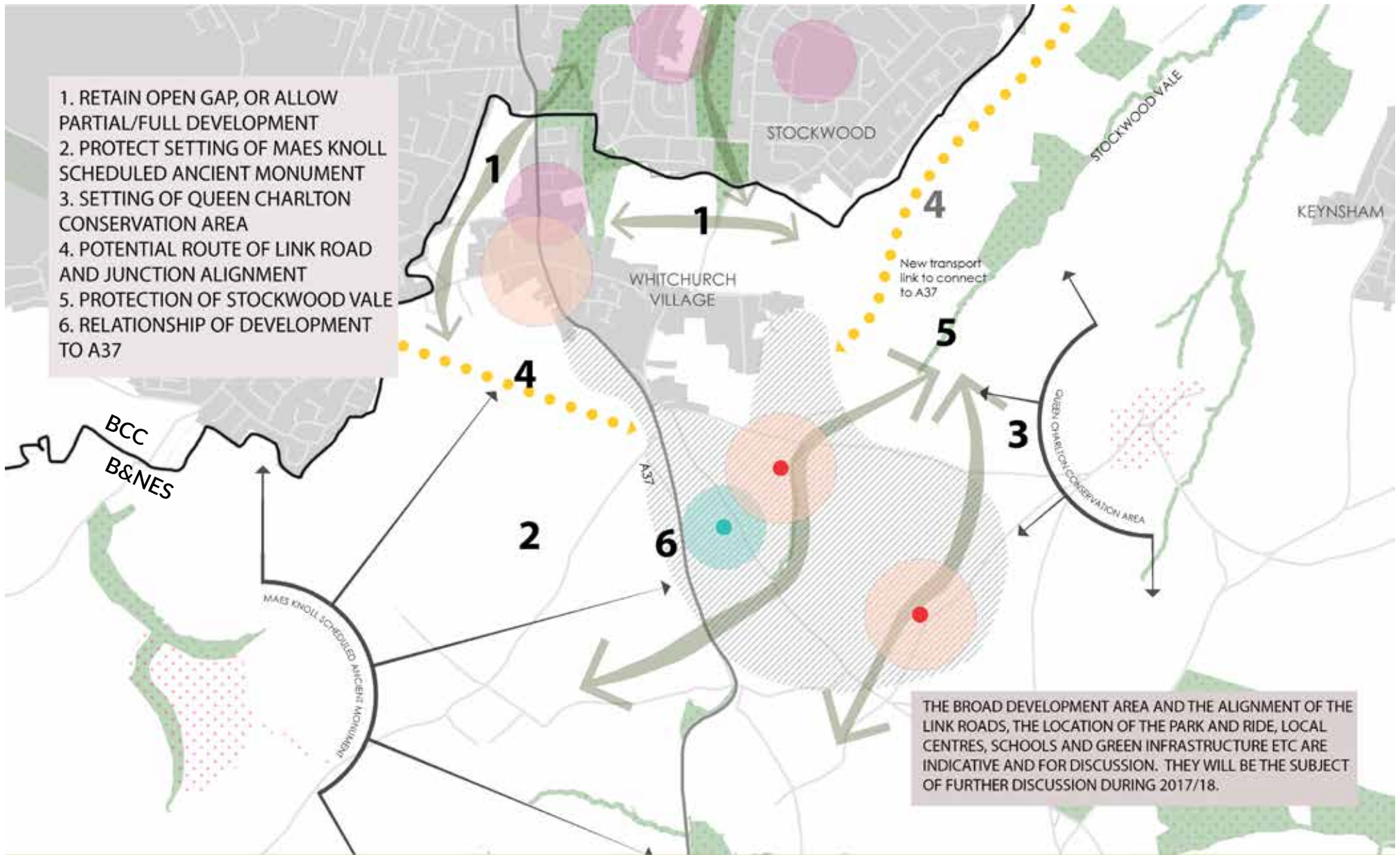
5.06 It is imperative that a new road that links the A37 and A4 is completed before the housing development is started.

5.07 A transport study is currently underway that is exploring the nature of this new link road and a preferred route for it to follow – the alignment of the road has not been identified as yet (although broad options are indicated in the Joint Transport Study). The study now underway will also assess technical deliverability, environmental impact and deliverability in terms of funding. Further consultation will take place on this after Spring next year.



Views from Maes Knoll

Diagram 10: Whitchurch Concept Diagram



Existing		Flood zone and water feature		Heritage assets		Indicative potential development area		Indicative Metrobus route		Indicative Park and Ride site
		Landscape and ecology assets								
Proposed		Urban extent and roads		Existing local centre		Railway improvements		New local centre		

**Whitchurch**

Concept Diagram

Not to scale      October 2017

## Local Plan – Issues & Options document

5.08 The next task following the Joint Spatial Plan, is to explore the vision and detailed policy for the development area, ensuring that the right conditions are established that delivers an exemplary new development that responds to its sensitive environmental context.

5.09 The following vision is put forward to encourage and to stimulate debate:

- What sort of place should this new development be?
- How can we make it as sustainable as possible, for example in encouraging active travel?
- What are the most important elements that need to be delivered?
- How can we begin to recognise the positive aspects of development?
- And how do we ensure that high quality development happens?

### Proposed vision

'The new community to the south east of Whitchurch village will be an exemplar sustainable development and an inspirational place; a high quality, people centred environment that feels safe, sociable and attractive for all. The design of the new development will respond positively to its sensitive and important environmental, landscape and historic context, and will be at least zero carbon.

It will be a residential led community, and will include local centres, two new primary schools and a secondary school, new health and community facilities, a variety of employment workspaces, all integrated with new parks, open space and green infrastructure.

New transport infrastructure will be put in place in a timely way to ensure that it is properly integrated and connected with its surrounding communities, and designed so that sustainable and active travel becomes the preferred option for most trips. The existing network of walking and cycle routes will be extended, public transport will be significantly improved, and a new multi-modal link road connecting the A4 to the A37, and onwards to the South Bristol Link Road, will be constructed prior to development.'

### Questions

9a What additional aspirations would you have here?

9b How can this vision be delivered?

## KEY ISSUES AND OPTIONS

5.10 The Concept Diagram shown above is an indication of what could happen, and the point of this Local Plan consultation phase is to explore the potential options for development. The following questions are intended to encourage and stimulate further discussion and debate. What kind of place could this be? How do we make sure that the impacts of new development are off-set by the creation of a great place?

5.11 In identifying land for new homes and related transport infrastructure at Whitchurch, the Council is suggesting a broad development location that is responsive to landscape and heritage sensitivities, and provides opportunities to enhance green infrastructure provision. This approach is in line with that set out in the [National Planning Policy Framework \(NPPF\)](#).

### Heritage and landscape assets

5.12 This includes responding to the setting of Maes Knoll, the setting of the Queen Charlton Conservation Area, and the valued landscape character of the area such as Stockwood Vale. This approach is informed by evidence which is available on the website.



## QUESTION

10a Is this the right approach?

10b Could some development take place in other areas outside of this broad development location? For example:

- In Stockwood Vale?
- Within the setting of Queen Charlton?
- Within the setting of Maes Knoll?

10c What would be the benefits of this?

10d What evidence is available to support development in these areas?

## QUESTION

11 What should happen with the existing separation between Whitchurch village and Bristol urban area? Should we:

- i. Continue to protect the Green Belt gap & keep the village separate?
- ii. Allow some development, but keep a smaller gap?
- iii. Close the gap with development, and potentially have less elsewhere?

## Local facilities

5.13 An important aspiration is to enhance the role of the existing village centre, and to provide for new local centres, schools and community facilities to support the new residential communities.

## QUESTION

12a How could the existing village centre be enhanced to cater for the needs of an increased population?

12b How do we best integrate new local centre and facilities with the existing communities?

## Green infrastructure

5.14 The provision of green infrastructure such as park and open spaces, allotments, as well as natural environments is very important for our health and wellbeing, and essential for biodiversity to flourish. It is a vital aspect to ensure that the new development becomes a successful place.

## QUESTION

13a How can we improve the quality of green spaces, and ensure that people have better access to recreational facilities and to the natural environment?

13b How could we make more of Stockwood Vale or Maes Knoll as important environmental assets to the local area? Could they form part of a new strategic parkland for the area?

## Sustainable and active travel

5.15 A key emphasis of the Joint Spatial Plan and of the Local Plan is to ensure the delivery of places that enable a greater shift to more sustainable modes of travel and for more active travel.

## QUESTION

14a How can we enhance routes for walking and cycling, for example to Keynsham and towards Bristol?

14b How can we encourage greater use of public transport?

14c How can we encourage people to be more active, more often?

14d What other ideas could be explored to achieve these objectives?

## Employment

5.16 The area has been identified in the Joint Spatial Plan as one that needs to provide for employment, and for this to be determined through the Local Plan.

## QUESTION

15 What sort of employment would be suitable as part of the new development and how much?

# DEVELOPMENT PRECEDENTS

**QUESTIONS** The following images from elsewhere are only for illustrative purposes, but can be used as ideas for the kind of development that we might like to see in the Strategic Development locations of Keynsham and Whitchurch.

16a What are the qualities of these places that could be used in either of the new development areas?

16b What aspects should we seek to avoid? 16c What other precedents would you use?



ACTIVE FRONTAGE TO OPEN SPACES | STRONG BELT OF PLANTING AROUND EXPOSED EDGES OF THE SITE TO MITIGATE IMPACT ON SENSITIVE VIEWS



STRONG NEIGHBOURHOOD CENTRE AS FOCUS FOR COMMUNITY © GOOGLE 2017



OPPORTUNITY FOR SHARED AND COMMUNITY GARDENS AND ALLOTMENTS ALONGSIDE PRIVATE PROVISION AND PLAY / RECREATION SPACE



# DEVELOPMENT PRECEDENTS (continued)



MIX OF HOUSING TYPOLOGIES AND TENURES - POTENTIAL FOR DIVERSITY THROUGH ALTERNATIVE HOUSING MODELS AND CUSTOM-BUILD



PEDESTRIAN AND CYCLE FRIENDLY ENVIRONMENT WITH CONVENIENT, SAFE AND ATTRACTIVE MOVEMENT ROUTES



POTENTIAL TO USE THE MARINA AND SURFACE WATER MANAGEMENT AS A DEFINING FEATURE OF THE SITE, CREATING CHARACTER WHILE BEING FUNCTIONAL AND SUSTAINABLE (KEYNSHAM ONLY)





## DEVELOPMENT PRECEDENTS (continued)



Images showing a range of energy efficient housing types with green spaces, and sustainable urban drainage.



## DEVELOPMENT PRECEDENTS (continued)

Images showing a range of energy efficient housing types with green spaces, and sustainable urban drainage.



# 6. Housing needs and student accommodation

## Setting the scene

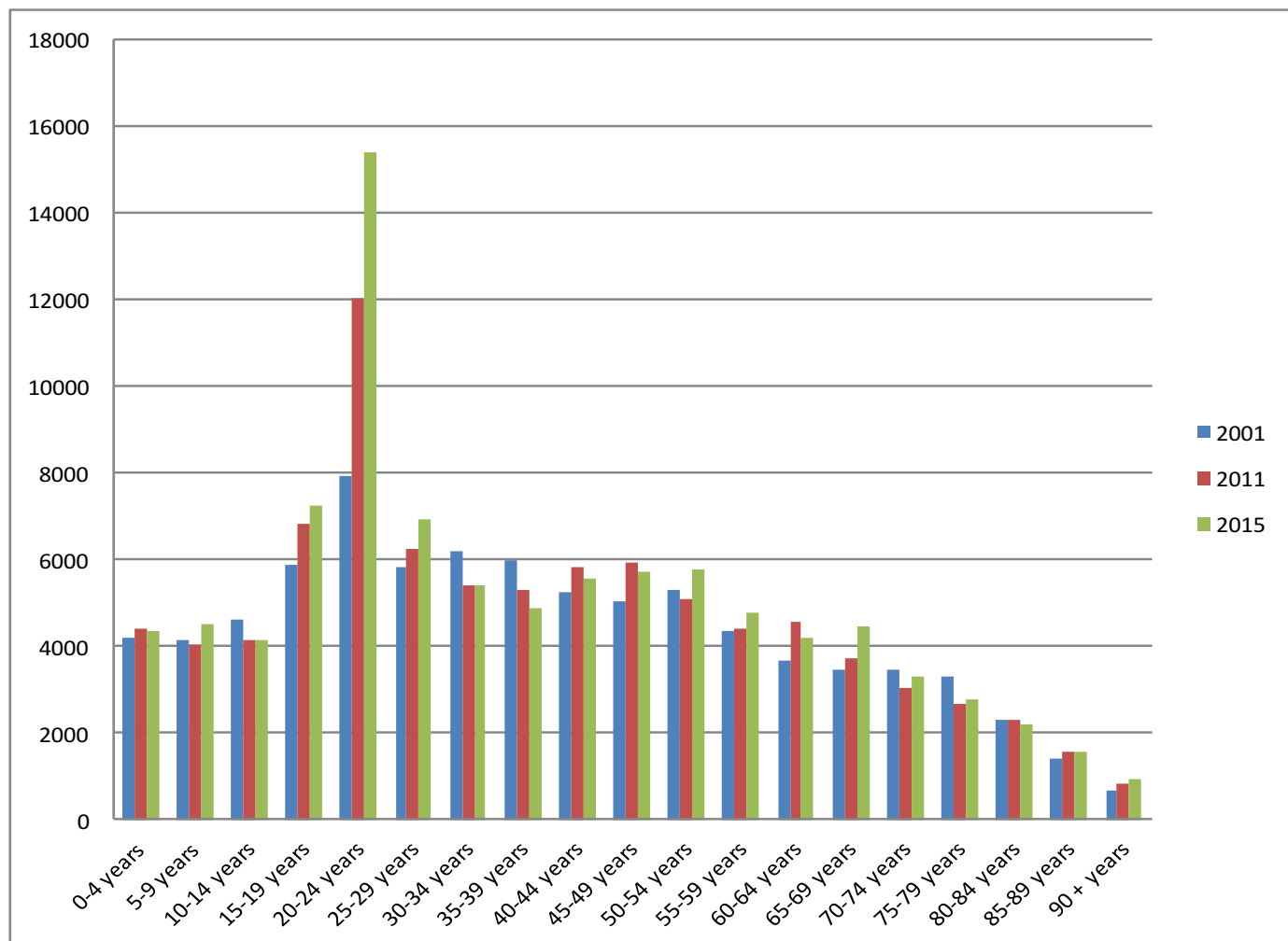
6.01 The JSP requires that provision is made for around 14,500 additional homes between 2016 & 2036. Other sections of this document consider the spatial strategy for accommodating this housing.

6.02 The overall amount of housing to be provided will address a range of specific needs. There is significant growth of population expected in the older and younger age groups within B&NES. As such housing needs relate not only to new family housing, but also focus on those of older persons and younger persons, including students.

6.03 The Council is undertaking further work to quantify specific housing needs and consider how these needs should be met. Options will be further explored in the next stage of consultation. However, given the significant implications of student accommodation pressure this issue is initially considered here.

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

Diagram 11: Bath population change



for development within the city, including the impact on employment land.

6.05 Bath is the main centre of population and jobs in the District and therefore is the primary focus for development for a range of uses and activities. The Joint Spatial Plan requires that, in addition to housing planned for through the Core Strategy, further new homes are provided in the City. Both the JSP and the Local Plan are also facilitating significant job growth, which will to a large extent be focussed on the city, as a strategic employment location for the sub-region, and specifically the Bath Riverside Enterprise Zone. In addition there is pressure for the city to accommodate growth in shops and hotels as a regional shopping and international tourism destination.

6.06 Therefore, the strategy for addressing the academic space and student accommodation requirements associated with both Universities needs to be considered alongside these other development pressures and ensuring the city is able to continue fulfilling its strategic economic role.

6.07 The current strategy set out in the adopted Core Strategy and Placemaking Plan is to prioritise meeting the needs for general housing and employment uses (mainly office space), whilst also seeking to meet forecast demand for additional hotel space. It accepts that longer term retail growth will not be accommodated and the provision of additional purpose built student accommodation is restricted, particularly within the City Centre and Enterprise Zone. The strategy for Bath will be reviewed through the Local Plan and will be considered further in the next stage of the options consultation.

6.08 The Houses in Multiple Occupation SPD

seeks to ensure further high concentrations of HMOs development in the City are avoided.

6.09 There was an estimated population increase of 15,832 between 2001 to 2015 (census mid-year estimate) in Bath and North East Somerset, of which 8,547 is estimated to be from the age group of 20 – 24 years old in Bath, over 50% of the total increase in the District (Diagram 11). If these trends continue, there will be significant changes in the population profile resulting in a more student led mix in Bath.

**Table 1: Student housing and HMOs**

Factor	2016/ 2017	2020/ 2021	Change 2016/17- 20/21
Total student forecast	25,308	29,742	4,434
Total student housing need	17,918	20,836	2,917
Total PBSA bedspaces	6,673	7,633	526
Residual demand 2016/17 baseline	11,245	13,203	1,957
Bedspaces demand from 2016/17 assumed baseline			1,496
HMO equivalent needed (1 dwellings =4 bedspaces)			374

## Universities' growth & student accommodation

6.10 Set out in Diagram 12 below is initial consideration of University growth aspirations and the associated student accommodation requirements, in order to start the process of considering potential alternative approaches moving forward.

6.11 It shows that about 1,496 bedspaces, (equivalent to 374 dwellings based on 1 dwelling = 4 bedspaces), are needed to realise the Universities' growth aspirations published in May 2016. The universities 5 year plans are under review and will inform the Local Plan Preferred Options stage.

6.12 Since that time national trends indicate a changing context. University student applications in 2017/18 from 'Home/EU' are 5% lower than the previous year. There are a range of factors contributing to this decrease such as increased fee level, availability of apprenticeships and Brexit (uncertainty regarding the fee for EU students).

6.13 In addition to levels of growth in student numbers the following issues are important:

- The affordability of student accommodation is becoming a big issue. Recently Purpose Built Student Accommodation has been coming forward as studio units, rather than cluster flats. Significantly higher prices are charged for studio units putting it out of reach for many domestic under graduates.
- Ensuring the needs of 2nd and 3rd year students are met – can and should these needs be met through Purpose Built Student Accommodation focussed on providing cluster flats?

- Student housing is seen as an attractive investment worldwide. Bath is listed in the top tier (high occupancy and rental growth) in the student housing development league table. (Savills 2017)

6.14 Within the changing national context and issues set out above understanding Bath's universities revised 5 Year Plans and the development capacities on campus is essential in reviewing and formulating the strategy for Bath. For example if both Universities maintain admissions numbers at or around their current level, less additional accommodation may be needed. However, even in these circumstances it may be sensible to plan for the provision of further Purpose Built Student Accommodation because providing the right type of accommodation in terms of rental levels, form and the students served may help to take some pressure off the private rented sector and the increasing numbers of HMOs.

6.15 The information above focusses on student accommodation numbers and provision. However, there are links between providing additional academic space as Universities expand and the need or demand for further student accommodation. In some University cities and towns e.g. Oxford, policies are in place that only allow additional academic space to be built if further student accommodation is also provided on campus or other land controlled by Universities. The introduction of such an approach in Bath needs to be considered.

6.16 Set out below are some options to help stimulate discussion.

*Please see Student Numbers and Accommodation Topic Paper for details.*



## Options for responding to the universities' growth and student accommodation demand

Options	Pros	Cons
<p><b>Option 1</b> Current approach: Prioritises homes and jobs in the City Centre/Enterprise Zone No specific Purpose Built Student Accommodation (PBSA) allocations</p>	<ul style="list-style-type: none"> <li>• Some protection for key employment and housing land</li> <li>• Flexibility as applications for PBSA will be considered on their own merits</li> </ul>	<ul style="list-style-type: none"> <li>• Market-led development likely to lead to loss of employment and 'normal' housing land.</li> <li>• Market-led development is likely to lead to a predominance of studio type expensive PBSA.</li> <li>• Does not encourage on-campus development</li> <li>• Pressure on new HMOs continues potentially resulting in dispersing families outside Bath</li> </ul>
<p><b>Option 2</b> Identify and allocate sites in or outside Bath (on and off campus) to meet need for PBSA</p>	<ul style="list-style-type: none"> <li>• Better management of new development</li> <li>• Allows greater protection of employment and housing land</li> <li>• Further academic space will need to be matched with provision of additional student accommodation</li> </ul>	<ul style="list-style-type: none"> <li>• Land suitable for student accommodation is often suitable for residential – could lead to loss of land that could be developed for 'normal' housing.</li> <li>• Does not necessarily encourage/prioritise on-campus development</li> <li>• Bath University: campus capacity not specifically identified. A masterplan is in preparation.</li> <li>• Bath Spa University – limited on campus capacity</li> </ul>
<p><b>Option 3</b> PBSA to meet need (including that linked to new academic space) only allowed on campus, with policies to refuse elsewhere</p>	<ul style="list-style-type: none"> <li>• Enables strong protection of employment and housing land</li> <li>• Additional academic space will need to be matched with student accommodation provision on campus</li> </ul>	<ul style="list-style-type: none"> <li>• Potentially limit or constrain university growth</li> <li>• Bath University: campus capacity not specifically identified. A masterplan is in preparation.</li> <li>• Bath Spa University – limited on campus capacity</li> </ul>
<p><b>Option 4</b> Option 3 plus releasing further Green Belt land to facilitate more PBSA (subject to exceptional circumstances)</p>	<ul style="list-style-type: none"> <li>• Enables strong protection of employment and housing land</li> <li>• Academic space will need to be matched with student accommodation provision on campus or on land released from Green Belt</li> </ul>	<ul style="list-style-type: none"> <li>• Bath University: campus capacity not specifically identified. A masterplan in preparation.</li> <li>• Bath Spa University – limited on campus capacity</li> <li>• Exceptional circumstances to release land from the Green Belt would need to be demonstrated</li> <li>• Loss of Green Belt land and environmental constraints such as AONB, WHS.</li> </ul>

### QUESTIONS

17a Which of the options should be the preferred approach?

17b Are there any other options?

## How to get involved

7.01 The purpose of this document is to facilitate discussion and comment on some of the critical issues facing B&NES and to start to test potential approaches to addressing these issues. We want you to be involved in this process.

7.02 Consultation will commence on 22nd November 2017 with the opportunity to send us your comments up to 10th January 2018. There will be further opportunities to be involved in later stages of the Local Plan preparation and to consider other issues not addressed in this document.

7.03 This consultation will be supported by four staffed exhibitions listed below where you will have the opportunity to come and ask questions and discuss issues with us. The four exhibitions listed will be supplemented by bespoke sessions at the Universities and sessions with town/parish councils and the Bath City Forum.

## Consultation exhibitions

Venue	Date
SOMER VALLEY The Board Room, Bath College Somer Valley Campus	Tuesday 28th November (3pm - 8pm)
WHITCHURCH United Reform Church Hall	Thursday 30th November (3pm - 8pm)
KEYNSHAM Civic Centre Community Space	Monday 4th December (3pm - 8pm)
BATH Brunswick Room, Guildhall	Friday 8th December (3pm - 8pm)

## Your comments...

You are encouraged to submit comments on-line at [www.bathnes.gov.uk/localplan](http://www.bathnes.gov.uk/localplan) or you can send them via email to

[local\\_plan@bathnes.gov.uk](mailto:local_plan@bathnes.gov.uk) or by post to:  
Local Plan Consultation, Planning Policy, Bath & North East Somerset Council, Manvers Street, Bath, BA1 1JG.