

West of England Joint Spatial Plan Consultation - Bath Preservation Trust response

Question 1: Does the proposed strategy make adequate provision for the housing needs of the West of England?

Bath Preservation Trust¹ is concerned that the evidence base is inadequate to deal with Student Housing needs. Bath and Bristol are both towns with 2 universities and multiple other colleges. In Bath's case, the student population amounts to as much as 25% of the resident population in term time. Yet the June 2016 Bath SMHA states that the objectively assessed need (OAN) figure assumes that future growth of universities will merely continue over the same rate as the period 2001-2011, and that if there is a difference in the level of growth this 'may impact on the OAN conclusions'. In Bath, there has been substantial student growth since 2011 and it is acknowledged that the Cores Strategy will require revision to deal with this; the projections of both universities include some further growth in both undergraduate and postgraduate numbers. This means there is a clear mismatch between the OAN from the SHMA report and the actual situation.

It is essential that Bath in particular has a strategy to deal with changes in student numbers, and that the spatial plan for Bath reflects this. We suggest that it would be advisable for the entire JWE area to consider a region-wide strategy for the treatment of student populations and to set appropriate policy for the spatial implications of these

¹ Bath Preservation Trust was set up in 1934 to safeguard the historic city of Bath, now the only complete city in the UK afforded World Heritage Status. The purposes of the Trust are to:

- encourage and support the conservation, evolution and enhancement of Bath and its environs within a framework appropriate both to its historic setting and its sustainable future, and;
- provide educational resources, including museums, which focus on the architectural and historic importance of the city.

The Trust does this by:

- Campaigning and providing expert advice and opinion of planning applications, planning policy and legislation, and other matters affecting the World Heritage site and its environs;
- Running museums with specific themes and collections relating to the Georgian period, its economy, its buildings, social life and personalities;
- Providing educational resources, lectures, talks and events for all ages, in particular relating to the Georgian buildings in Bath; and
- Having the active membership of involved and concerned subscribers.
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The Trust is a registered charity supported by over 1400 members, who share a passionate concern and interest in the city. We receive no government funding, but are financially supported by our members, by grants and donations, and by income from our museums.

population whether on or off campus. In the case of Bath's universities we have recommended that planning policy should require the universities to update their campus development masterplans to 2036 and to include within this a student housing masterplan indicating where, physically, they expect students to be accommodated across all years.

Another issue which has a disproportionate effect on OAN and delivery in Bath is the presence of a growing second-home and holiday let market. It is estimated that there are 500 bed-spaces in Bath City Centre which are currently available for let as 'party houses' of 10 or more. The figure would increase considerably if smaller let properties were included. We are of the opinion that this distortion to the market should be accounted for in the OAN and/or rapid changes in planning and enforcement policy imposed to ensure that Bath housing stock does not continue to be diminished in this way. At this stage for the Emerging Strategy it is essential that the evidence base has a means to take these data into account.

The issue of affordable housing is considered below.

Question 2: How can we increase the delivery of homes, including much needed affordable homes in the West of England?

The Emerging Spatial Strategy fails to answer the question of the shortfall in affordable housing delivery. It observes that delivery is falling behind need already and proposes one solution (oversupply of market homes in order to deliver more affordable homes) only to reject it in the same paragraph.

The strategy recognises that this shortfall is a national as well as a regional problem which highlights that it is the entire market and delivery mechanism which is flawed in terms of achieving these targets.

The challenge is compounded in Bath because land values and development costs can be high, which are in turn used by developers as a reason to renege on policy requirements in relation to affordable housing on grounds of viability. Recent examples include the Hope House Development where a 30% provision has now been removed. A commuted payment does not compensate for the loss of affordable homes as there are land shortages in Bath and so there are no obvious sites elsewhere to build alternative affordable accommodation.

We have at least three suggestions (below) as to how the Regional Strategy and the JWE authorities can 'disrupt' the currently failing delivery mechanism.

- Our proposal in Bath (which could be developed region-wide) is that there needs to be a robust policy enshrined in the Strategy which requires an open book viability

assessment process and emphasises that overpayment for land will not absolve developers of planning obligations. Such a policy will require robust legal advice and should draw on the Viability SPD in Islington and any others which have proved defensible at Appeal.

- Another mechanism is to use devolved infrastructure funding (post devolution) to prepare brownfield sites to be 'development-ready' so that development costs are much clearer and less risky, thus encouraging a wider take up by 'non-volume builders'. Such an approach can be found in Holland and other European countries.
- In addition there should be more creative use of land ownership. In Bath, the Council is a substantial landowner but appears to run its property portfolio chiefly as a profit-centre rather than seeking to use its land transformationally to meet affordable housing needs.

Finally (on this topic), it may be necessary for the Bath HMA to turn to west Wiltshire to deliver some of its housing needs. The absence of Wiltshire from the West of England Region is extremely problematic for the proper assessment of spatial or transport planning for Bath. Our suggestion is that the way in which the authorities exercise their 'duty to cooperate' in relation to Wiltshire and to a lesser extent Mendip should be an open process, included in the timetable and with opportunities for open consultation.

Question 3: Does the proposed strategy make adequate provision to address the economic and employment needs of the West of England?

The Economic Development Needs Assessment (EDNA) implies that there is adequate or in some cases over supply of employment provision already planned, while recognising that there are other areas of the country which might be seen as highly competitive to the area in delivering its economic targets. It also highlights the fact that there is pressure from other land uses on land designated for employment. In Bath this issue is compounded by high house prices and demand for student accommodation developments. While the plan suggests (para 53) that 'significant interventions and joint working' will be required to deliver appropriate development it does not describe strategically how this will be achieved, in particular taking into account the strong demand for competing land uses.

The EDNA also only deals with B-class uses. By failing to address the needs of the (very significant) tourism sector, and without ensuring that the spatial plan at worst does not undermine and at best supports, enhances and develops this sector, there appears to be a major element of the economy and associated employment which is ignored.

Question 4: Does the Preferred Spatial Strategy and the locations identified meet the Plan's strategic priorities and vision?

We are not asked to comment on the strategic priorities and vision themselves. However in relation to Bath it is not possible to answer this question without doing so.

The restriction of 'Strategic Priority 3: Environment' to the natural world, excluding the high quality built environment of many towns & villages means that the Plan fails to encompass a whole section of the NPPF (12). This omission should be rectified by an additional bullet point under para 4 of the spatial implications (p9) to emphasise the value Conservation Areas & World Heritage Sites bring to the region & the requirement to 'conserve and enhance' them.

Apart from this, Bath Preservation Trust is pleased that the Emerging Strategy clearly understands the substantial 'physical and environmental constraints' in Bath which mean that, in the words of the Strategy document, 'due to significant environmental constraints there is no scope to further expand Bath outward'. However, the Spatial Vision for the area is undermined by seeing Bath's qualities merely as 'constraints'. Rather it should be seen that the conservation and enhancement of valuable environmental assets (built and natural) mean that Bath should not be expanded outwards.

With the Green Belt featuring as an issue for consideration, the setting of Bath World Heritage Site also needs to be named more generally than in table 2 (which specific reference is welcome).

Taking this into account, the plan is silent on how the area is to respond to proposals brought forward by developers in locations currently not considered suitable (apart from those identified in Table 2). While this may be a matter for individual local plans and LPAs, it would be helpful to clarify how the plan is to deal with (for example) the under-supply of affordable housing leading to the promotion of urban or village extensions in areas not included in the plan.

Question 5: Are there any reasons why this strategy or identified locations could not be delivered?

There is a substantial challenge as mentioned above in existing market models to the delivery of affordable housing in Bath.

Question 6: Is the Preferred Spatial Strategy the most appropriate strategy, when considered against the reasonable alternatives?

We are pleased the plan recognises the limits that the special environmental qualities of the City of Bath place on its overdevelopment. Given this, without consideration of West Wiltshire as a potential strategic location the picture for Bath cannot be considered complete.

BPT is very concerned about certain elements of the emerging Transport Plan and will respond to that consultation separately.

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