

# Bath Future City: Planning, Development, Sustainability and Community

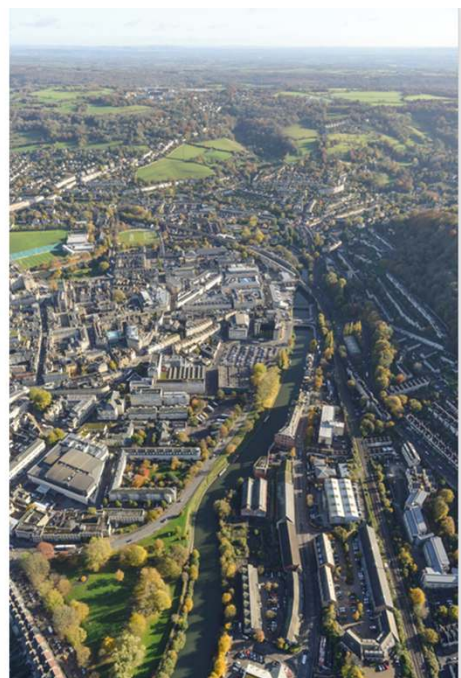


## **Councillor Matt McCabe**

I'm Councillor Matt McCabe. I'm the Cabinet member for the Built Environment, Housing and Sustainable Development, which essentially means planning and housing and B&NES homes.

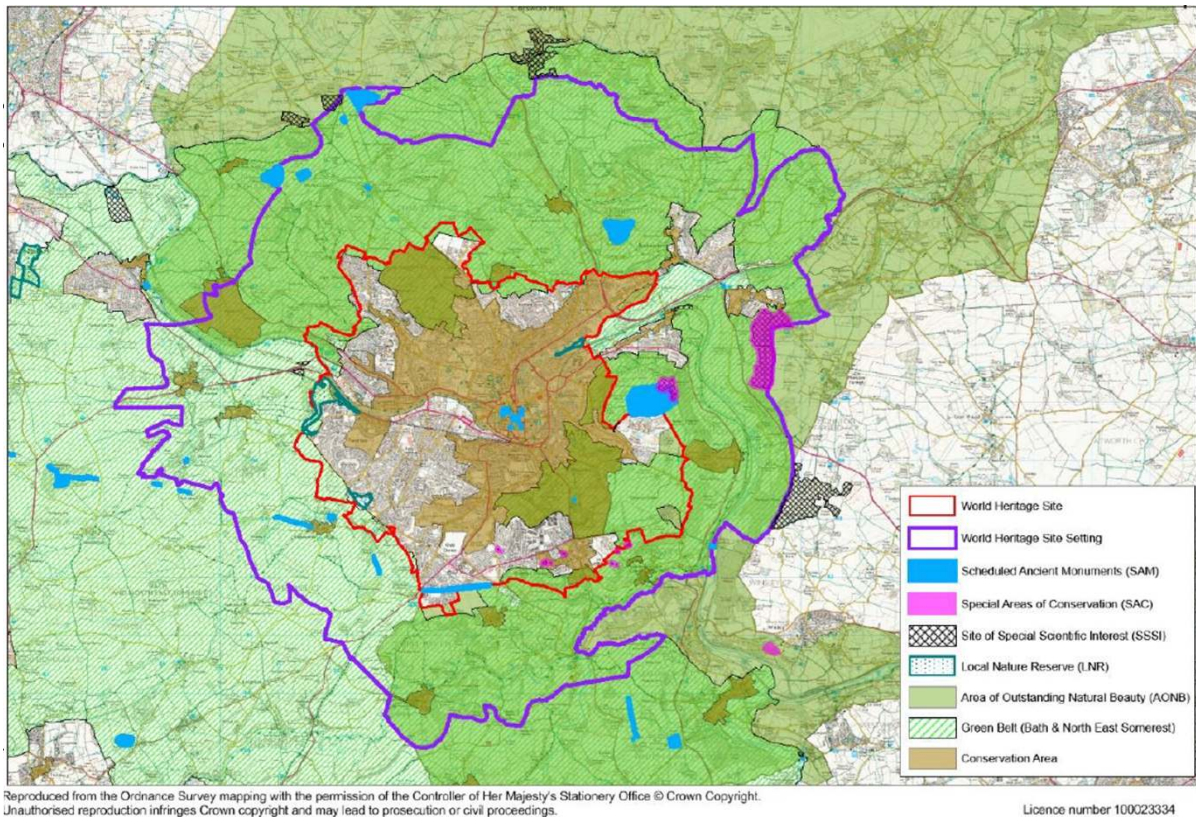
### **Overview**

- State of the City
- Housing Need
- Proposed revisions to the National Planning Policy Framework (NPPF)
- Resetting the Local Plan
- Journey to Net Zero for Bath (Transport Strategy)
- Questions



This is the overview of what I'm going to talk about – the state of the city, the calculation on the housing need, the changes to the NPPF (National Planning Policy Framework),

why we're resetting the Local Plan, what that means and then the Journey to Net Zero, which is the transport strategy.



So this is the state of the city with some with some overlays. So the city boundary is the red one. The brown area is the conservation area, which is pretty big. This purple line really important – That's the green setting for the World Heritage City. And that, as I will point out later, is one of the biggest constraints to the city growing.

And you'll notice, we've got our heritage stuff in the middle, and we've got the Iron Age stuff up on Claverton Down and we've got the path of the Wansdyke. What we have up here is what was called the Area of Outstanding Natural Beauty, which is now the Cotswolds National Landscape, and that comes around to there, and it comes all the way around to here, and then this is Green Belt. The important thing to remember is, despite what the government's saying about relaxing issues around the Greenbelt, actually that's not the issue for Bath.



## Heritage

- We're in good shape
- Architect in Residence
- The new Management Plan has been out for consultation
- Responding to a changing climate
- Visitor number recovering
- Listed Building Consent Orders

So heritage – in the city itself, we're in pretty good shape. I think over the last two or three administrations, the Council's really gone quite strongly on the management of the Heritage City. We have just started a new management plan and it's been out for consultation and that's going down really well with ICOMOS (International Committee on Monuments and Sites).

Underneath UNESCO, who set the standard for World Heritage Sites, their consultative planning body is ICAMOS, and there is ICOMOS International, and ICOMOS UK. So Heritage England deal with ICOMOS. Heritage England obviously oversee us quite well.

We said we'd bring in an Architect in Residence – that was essentially to ask the question about what should be your approach, if you're a developer, what should be your approach to developing in a double listed World Heritage City? And we're very grateful to the university for paying for that post and Bob Allies, who's in post at the moment, he has said he will do the whole of Bath and North East Somerset. So we're looking to raise the standard of applications that are coming forward, and look at some new ideas about how we approach development in the city.

The new management plan, so that's the World's Heritage Site's management plan, was out for consultation last summer. And what was really surprising is that all the stakeholders who were involved with that were concerned about climate change and climate emergency and the nature emergency as well. So a lot of that's gone into the new management plan.

This is the first management plan that covers a World Heritage Site, and a load of other sites. So there's Bath, and then there are the 11 Great Spa Towns of Europe. So it's the

first one that covers all of that, and so everyone's quite interested in seeing it come out, – it's about to be published in a few weeks' time.

What we know is that the heritage element of the city attracts most of our visitors, and visitor numbers are recovering. The other interesting thing we're trying to do is Listed Building Consent orders. If anyone's trying to put double glazing into a listed building or put solar panels on the roof, you'll know that our heritage, our conservation plan, is very anti anything that results in change. However, what they are doing is they're saying, 'Well, look, if you meet these criteria, then you can assume permission. That's what a Listed Building Consent order means. So a lot of people have gully roofs. So whilst the front of the house or the back of the house might be in a prominent view, actually the middle of the roof isn't the same, so if you've got that sort of gully roof, then you can assume permission.

So one officer has been doing it in her spare time, so when will this happen? But we think because government's now taken an interest we can get some resource to bring that forward more quickly. But anyone who lives in a Conservation Area, anyone living in a listed building, is waiting for this to come out, so you can understand exactly what you're entitled to.

## Housing Needs Assesment

BATH CITY 2022-42	Unable to afford Market Rent – Social Rent	Unable to afford Market Rent – Affordable Rent	Affordable Home Ownership	Total Affordable Housing	Total Market Housing	Total Housing
<b>Number of Dwellings</b>						
1 bedroom flats	173	15	303	490	-213	277
2+ bedroom flats	138	53	183	374	-55	319
1-2 bedroom houses	91	35	622	747	-251	496
3 bedroom houses	326	141	204	671	1,118	1,789
4 bedroom houses	120	47	46	213	190	403
5+ bedroom houses	47	18	10	75	-1	74
<b>ALL DWELLINGS</b>	<b>895</b>	<b>308</b>	<b>1,368</b>	<b>2,571</b>	<b>788</b>	<b>3,359</b>
Allowance for C2 provision (equivalised)	-	-	-	-	-	116
<b>TOTAL HOUSING NEED</b>	<b>895</b>	<b>308</b>	<b>1,368</b>	<b>2,571</b>	<b>788</b>	<b>3,475</b>
<b>Percentage of Dwellings (excludes C2)</b>						
1 bedroom flats	5.2%	0.4%	9.0%	14.6%	-6.3%	8.3%
2+ bedroom flats	4.1%	1.6%	5.5%	11.1%	-1.6%	9.5%
1-2 bedroom houses	2.7%	1.0%	18.5%	22.2%	-7.5%	14.8%
3 bedroom houses	9.7%	4.2%	6.1%	20.0%	33.3%	53.3%
4 bedroom houses	3.6%	1.4%	1.4%	6.3%	5.7%	12.0%
5+ bedroom houses	1.4%	0.5%	0.3%	2.2%	0.0%	2.2%
<b>ALL DWELLINGS</b>	<b>27%</b>	<b>9%</b>	<b>41%</b>	<b>77%</b>	<b>24%</b>	<b>100.0%</b>
<b>Affordable Housing Need</b>	<b>35%</b>	<b>12%</b>	<b>53%</b>	<b>100.0%</b>	<b>-</b>	<b>-</b>

So that's the heritage. The next thing is, well, what do we need for the future? So we've done a housing needs assessment – the important number here is 77%. We have a policy that all new housing should deliver 1/3 affordable homes, and thanks to land banking, overpaying for land, cost increases, most developers can come up with a viability study that says they can't possibly do any affordable. So in reality, what the city achieves is somewhere between 15 and 20% affordable. That means we have a big need

for affordable housing, 2571 and an overall need then of 3359, and that means that the affordable need is 77% of all new builds.

There is no way that the market can deliver that. There's no way that the market would even try to deliver that. So we need to find a different way of doing it. So if we could achieve 40% affordable and then deliver 6500 houses in Bath over the next 20 years, at 40% affordable, we would meet our housing need.

One of the things we're doing with our development company Aequus, is trying to ensure that wherever we can, we aim for 40% affordable. Now it is the case that sometimes you have to do things to raise the money to deliver the affordable, and therein lies the problem. So how it works is Homes England will give you money to prepare land. So like the gas works, we've got money to prepare, millions of pounds to decontaminate the land and make it ready for development, and in some cases, they will then also offer some money towards the affordable or the social units.

Government's changing that a bit, so we are just waiting to see how that pans out. But generally, what the market does is it sells market value homes and uses some of the profits to subsidise some affordable units. But if there's a question over what is affordable, if it's 80% of the market, but the market value is enormous, then 80% is still not affordable.

But that's the housing need. We have a great need for housing. So what has the government said?

## Key NPPF Revisions

### Housing Supply

- Local Authorities are required to plan to meet housing need
- Our housing figures have been revised: 104% increase for B&NES from around 14,000 to about 29,000 homes over the plan period
- 5 Year Housing Land Supply requirement re-introduced
- Presumption in favour of sustainable development strengthened
- Strengthened expectation for approving brownfield site housing applications, and should promote uplift in densities in urban areas



The local authorities are required to plan to meet the need. So what's happened for us is that the government has increased our target by 104%, so they've just over doubled the target. So last year, when we launched the local plan, the new Local Plan, we were working towards 14,500 new units, new homes, and that's just gone up to 29,000 over the plan period.

And that's a huge increase, but what the government's done is they've taken out the urban uplift, and they've put an affordability uplift in instead. And when you see that our affordability need is 77% of all new houses, that's why it's rocketed skyward. The other thing is, five year land housing supply has just been brought back in. But of course, doubling our housing target has meant that our land supply has just been halved. So although there is a period of grace, over the run-up to making the next Local Plan, we will not have a five year land supply. We had a six year land supply; it's now a three year land supply, so we need to bring some sites forward as quickly as possible and try and head that off. The other thing we can do is bring lots of other plans forward, like design codes, obligations, planning obligations. Bring those forward as soon as possible to try and head off the challenge.

You've got to show that you have got the land to build your housing numbers on over the next five years. So you say that's your 20 year period. Break that into five year chunks. So one quarter of what we've got to deliver, we've got to show where we're going to put that. So without the land supply, we don't know where we're going to put it, is what the developers will say. If they get refused, they go to appeal, and they say to the planning inspector, 'but the council's got no plan for where it's going to put the houses – we can build on this field, so you need to allow it'. Then the planning inspector will then have to make that judgement about why we've refused planning.

But they come and say a presumption in favour of sustainable development has been strengthened, and that's important, because a lot of our sites are not sustainable – I'll come on to that in a minute – and there's a strengthened expectation for approving Brownfield site housing applications.

Obviously, everyone says Brownfield first – it will save buildings, so reuse existing buildings where you can, Brownfield and then Greenfield. But the Gas Works site is the last of the big brownfield sites in Bath. So that's sites coming forward, and then that's it for big brownfield sites. So the coming years are going to be going to be difficult.

## Key NPPF Revisions

### Strategic Planning

- Greater importance for sub-regional planning
- Duty to Co-operate strengthened with key outcome of better consistency of Local Plans

### Green Belt

- Required to review Green Belt and release land to meet housing need in full – unless undermines overall function
- Introduces concept of 'grey belt': brownfield land, which only makes limited contribution to purposes
- Golden rules: sequential approach of brownfield first, grey belt in sustainable locations and then greenfield sites; 50% AH; improve nature



Strategic planning, obviously with the numbers so big, the spatial planning is really important. Those powers were given to the West of England Combined Authority (WECA) mayor, and unfortunately, the outgoing Mayor wrote to the Secretary of State and handed all the powers back, and said he wasn't going to do the spatial planning strategic planning. So the three authorities had that dumped on them. It's really difficult to plan outside your own area, but we have to try and work with South Glos and Bristol to try and plan together for the future.

We did write to Wiltshire saying, 'Would you like to explore taking some of our houses?' And there's a very snotty response via the press.

So they changed the rules on the Green Belt, but as I said earlier, the issue for Bath is not the Green Belt, it's the green setting. The listing, you know, our World Heritage listing says – remember that purple line all the way around – that's the listing, It is the green setting. And as soon as you touch the green setting, as soon as you try and build in it, every consultant comes in and says, 'Oh, you'll lose your World Heritage status if you try and build'. We talked to government, and they're saying, 'Well, we're telling you, you can look again at the Green Belt and make that assessment. It's not a green belt issue, it's a World Heritage Listing issue.

## Key NPPF Revisions

- Plan for growth in key economic sectors (Government's Industrial Strategy/Local Growth Plans)
- Greater emphasis on social rented housing (lowest incomes) and less emphasis on affordable home ownership – 50% target on green sites
- Greater support for onshore wind and other forms of renewable energy

So it's not just housing – we need to plan for where the jobs go as well. But there is a greater emphasis on social rental. So I think where the government's pushing for more land to be released for housing, they're also saying we want to see a 50% target for social rental – well, affordable, with a larger proportion of social rental, and that's really important. And greater support for onshore wind and other forms of renewable energy. We have done that mapping. The World Heritage listing has 18 protected views, and they very often overlap as you look around the city. And then we've mapped that further out into North East Somerset, so that the tops of windmills don't pop up in in these protected views. So we know where we can put windmills, as well as having a policy to say solar panels need to be on agricultural, freebie grade land, which often helps over 40 years, helps improve the soil anyway.

## Resetting the Local Plan: what does it mean?

- The spatial priorities and many of the proposals from the previous Local Plan Options consultation, as well as the comments received, will remain valid and will inform the Local Plan reset.
- Further evidence work to be commissioned e.g.
  - updated Local Housing Needs Assessment (LHNA) – housing types and tenure etc
  - additional Green Belt review/assessment
  - economic growth assessment
  - transport assessment/modelling
- Re-look at options for development
- Further engagement with communities and other stakeholders in Summer/Autumn 2025.



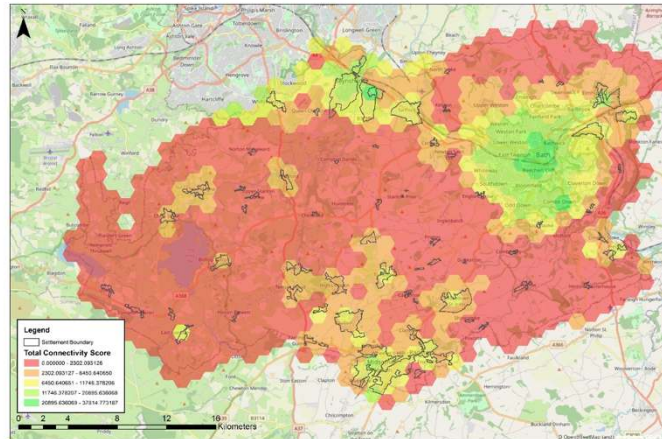
So resetting the Local Plan – well, obviously, having doubled our numbers, we looked at a lot of sites last year, so the evidence we've gathered is still relevant, still current, but we will need to look again. So the housing needs assessment has been updated. We will do the Green Belt review, because that is going to be really important, especially on the A4 corridor Saltford, Keynsham, that Greenbelt review becomes a target. So spatially, when you go back to that spatial planning, WECA is saying that's a really important zone. They're looking at employment in the Somer Valley as well, so there may be the opportunity to put more houses there, But WECA tends to have its focus on Avonmouth and Bristol and the business parks in South Glos. But they are now having a look at us and that features into WECA's economic growth plan. So we need to take account of that.

Transport has not been particularly successful up to this point. With WECA as the Transport Authority, it hasn't gone terribly well. I was talking to somebody the other day, and I said, 'the mayors haven't been terribly successful'. And he said, 'Well, I know all about the mayor.... And I said, Did you know there was a mayor before that? And even though the first mayor was quiet and a bit of a non-entity, actually, he did spend a lot of money on improving the rail links. So there was that – this mayor, I won't say anything further on, because I haven't got anything polite to say.

So further engagement is an important thing.

## District-wide Spatial Strategy

Current **Spatial Strategy** focuses on growth at the most sustainable settlements in the District, using transport connectivity mapping and facilities audit as a starting point.



So the district wide spatial strategy. So the red areas are where people essentially drive to work. The green areas are where people walk to work, and then everything in between is where people use public transport. So the red areas = high carbon cost. Green areas = low carbon cost.

So you would say it makes sense to stick all your new housing right in the middle, but of course we can't, so we then start looking at this corridor where there will be lots of buses running up and down. Potentially on the A367 there is a bus every 13 minutes. So there's lots to look at, but generally this is one of the bits of evidence that guides us. So if you stick a load of houses here, that counts as unsustainable development. So if you were to do a new town and put a lot of houses in one place that would be unsustainable, because the A37 would desperately need upgrading again, and that's where WECA would come in.

So if we were doing spatial planning, or WECA was doing spatial planning, it can say, right, this corridor is extremely important. We're going to upgrade the roads, put in bus lanes, cycle lanes, and we'll create a lot of housing down here. They've still got to do something if the Somer Valley gets more houses. But that's something we've got to work collaboratively on with our colleagues in WECA and the other authorities.

## The Local Plan and the World Heritage Site (WHS)

- The UK planning system is a principal method of protecting the Outstanding Universal Value of the WHS
- The existing Management Plan relies on the Local Plan to deliver some of its objectives
- The Local Plan includes:
  - strategic policies that seek to **sustain and enhance** the significance of the city's heritage
  - A set of **Design Values** that capture the essence of Bath and provide the context for a specific **Bath Design Policy**. This will provide the context and framework for more detailed design initiatives such as **Design Codes**.
  - Detailed **site allocations** setting out development requirements and design parameters.



So there's also the Local Plan – this shows you how the areas of Bath get chunked up. We can't build out because of the green setting, and we can't build up because of the protected views. So what we have to look at is chunks of the city and see if we can improve this area for employment. And then we look at other areas and we say, 'Can we look at that for density?' But essentially, these policies protect the city.

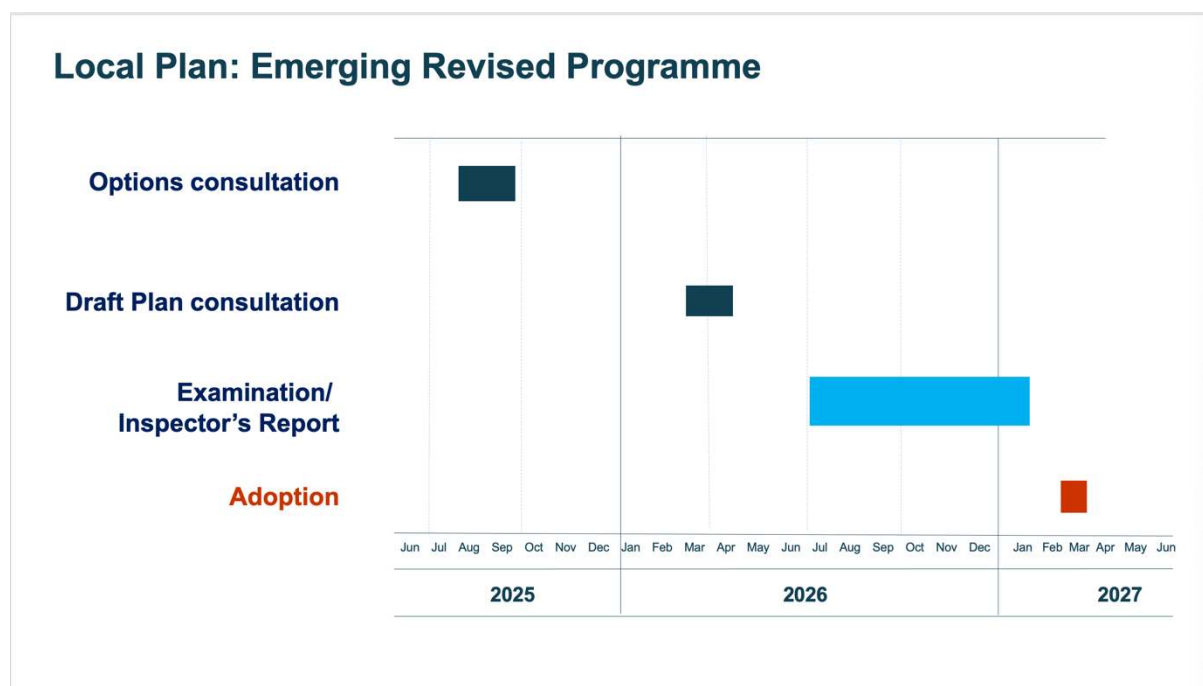
## Locksbrook & Brassmill areas – Bath's Production Quarter

This is an important industrial location that complements the city's central office and workspace core and is critical to the city's economic ecosystem. Working with Fielden Clegg Bradley Studios, we've produced a study to inform the Local Plan and to:

- Identify opportunities to intensify sites, providing space for industrial, trade counters, creative industries, advanced engineering sectors, r&d, biosciences etc
- Enhance the riverside environment, ecological networks and sustainable transport
- Work with Locksbrook Creative Industries Hub and the Fashion Collection Archive



So there you go. That's the Locksbrook & Brassmill areas. So the Local Plan goes into more detail on those.



So this is the revised plan of the timeline. So we start the consultation on the Local Plan, and then move forward to what has been adopted in 2027.

### Community Engagement

- Key role for communities – working with you to inform the Local Plan and how we manage change
- Updating Communications and Engagement Plan
- Lessons Learnt from Previous Options Consultation
- Broad and Targeted Engagement
- Monitoring Engagement Demographics – ensure representative
- Co-ordinate with other Council Consultations



Community engagement. The government sets Reg 18, Reg 19 consultations. And what you can do, as the local authorities is heavily prescribed by the government, how you consult. And most people find it incredibly annoying and incredibly frustrating and really hard to navigate.

So what we've decided to do, having looked at lots of other things, is look at how the rest of the Council consults, and we're going to start an ongoing engagement process. I stood in a hall in Saltford, told people how to respond to the Local Plan consultation, and I was very successful, because we got 900 odd responses to a single plot of land, all of which were empty.

So you know, what the Local Plan – the official government prescribed consultation – does is it allows, once you've got the hang of it, it really does allow you to object in a very strong way, and it's not very good at capturing the people who support elements of it, so we're going to look at that.

I've already spoken to Age UK, where there's some younger people who work in the bars in Bath. Age UK tell us they are saying, 'Don't stick us in old people's camps. We don't want that. We want to be in communities. We like to talk to young people in villages.' They want to say, we want to stay in the village. We want to downsize. But when people build in villages, it's a big, million pound house that nobody can afford. In the city where we're talking to ex bar staff, because there's a group of ex bar staff who currently or have previously worked, most of them have had to move away because they can't afford to live in Bath. So we need to hear voices from people who are priced out of the city. And it's one of those things that in Bath, you're either rich enough to afford to buy a house, or you're poor enough to qualify for social rent properties, and everyone else in the middle gets priced out. So we're going to run an ongoing consultation.

So alongside that is the journey to Net Zero. So if we're building 29,000/30,000 new houses over the next 20 years, that could end up being 60,000 additional car journeys twice a day in the region if we do nothing. So we've got to do something and we've got to make public transport more attractive and more reliable, and we've got to improve it for cyclists and wheelers and people who walk. So that is one of the things that came out of the Net Zero.

## Journey to Net Zero Objectives

- **Reducing vehicle carbon emissions to achieve carbon neutrality by 2030**
- **Improving air quality and health**
- Promoting sustainable mobility
- Supporting and enabling economic growth, competitiveness and jobs
- Widening travel choice

- Widening access to opportunities: jobs/learning/training
- Safeguarding and enhancing the unique historic environment and World Heritage Site status
- Improving quality of life in the city

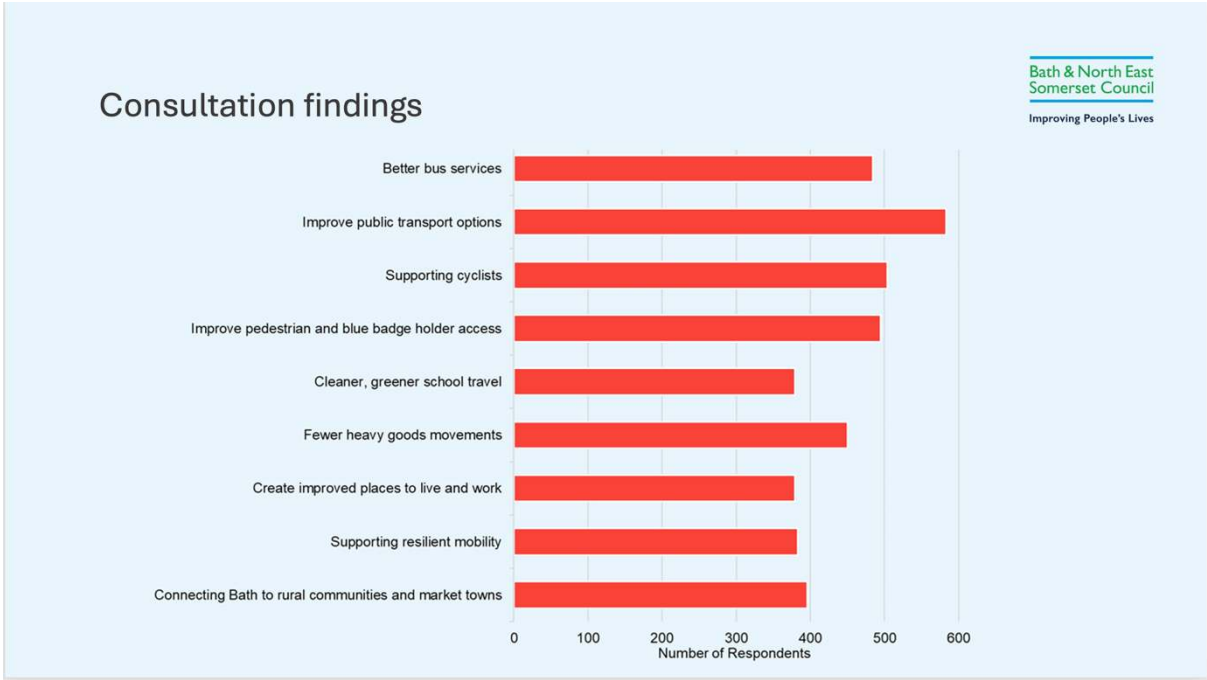
The Plan has been informed by the findings of the *Current and Futures Report* (published in April 2020) and the consultation in early 2021.

Bath & North East  
Somerset Council  
Improving People's Lives



So improve public transport options and then support cyclists. This was local people saying, What do you want from transport? How should we improve things? Actually, better access for blue badge holders came in as strong as better bus services. So it's absolutely the case that we cannot build nearly 30,000 new houses over the next 20 years and do nothing about transport. And it's a very hard ask, because very often you're asking somebody to give up the parking space outside their home for a cycle lane or a bus lane.

And you know, I would be unhappy if I had to park miles away from my house. But if we do nothing, then it'll mean nothing being able to park outside your house, because you're just simply getting your car, pulling out into the traffic and sitting there for half an hour. Because there'll be 1000s more cars on the road, so we have to act on public transport and transport infrastructure alongside where we put the houses. And on that I look forward to working very cooperatively with officers and colleagues in the West of England Combined Authority (WECA), who are the transport authority, and hopefully we can get something that we can find that is a positive solution.



## Philip Haile, Transition Bath

I represent Transition Bath, who do a lot of work in the planning space.

### Shaping the Future City

**Transition Bath: local sustainability charity:**

- **Comments on 300+ planning applications per year**
  - New builds meeting local SCR6,7,8 standards
  - Historic homes: encouraging energy efficiency best practices
  - HMOs: meeting EPC 'C' standard (policy H2)
  - Transport, green spaces
- **Involved in local and government planning consultations** e.g.
  - Local Plans: including appearing at the Planning Inspectorate
  - Government: e.g. Future Homes Standard
- **Objective: using the planning system to ensure Bath has the highest environmental sustainability standards**, including energy efficient homes, sustainable transport and green spaces



We comment on about 300 planning applications per year, roughly split into (first of all) new builds. So we try to ensure that we meet Bath's new build standards – and Bath has the highest new build standards in the country from an energy perspective.

We comment on historic homes. There's been quite sea change with conservation officers in the last two years, in that they're now open to much higher energy standards, whereas probably five years ago, they would block them. The Assembly Rooms planning permission has just gone through recently, involving heat pumps, vacuum glaze windows and solar PV. The same for the Grade 1 listed Francis Hotel just around the corner. There's been a big change, so that's good.

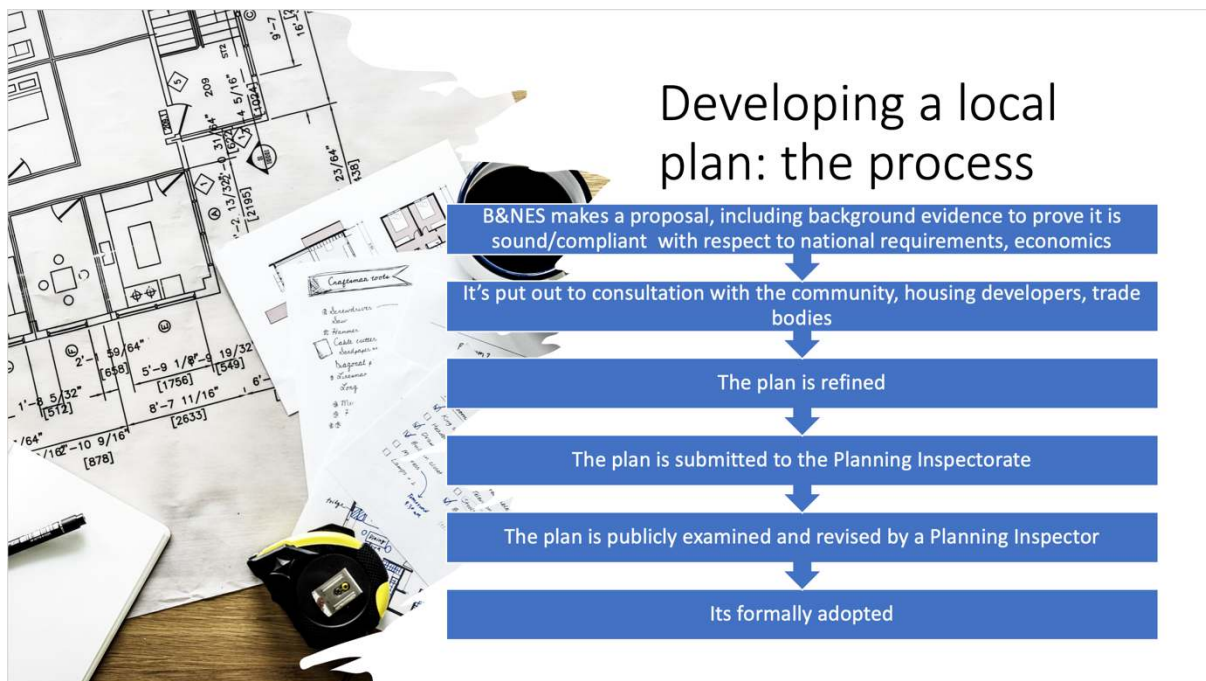
Another bar standard we're quite interested in is HMOs for new license. HMOs have to be EPCC (Engineering, Procurement, Construction and Commissioning) the nationally leading standard. And we're also interested, to some extent, in transport and green spaces, and we get involved in both local and government consultation. So we're trying to use the planning system to make Bath as environmentally sustainable as possible.

# Constraints on Local Planning Policy

- National Planning Policy Framework (NPPF, England only): Housing targets, standards, Local Plans
- Government Primary, secondary legislation and ministerial statements
- WECA Spatial Plan
- Available land
- Funding
- Viability
- Local Plan
- Building regulation
- Planning Inspectorate and Examination



We can't have everything when we're developing a local plan – we're constrained by lots of different things. So with the National Planning Policy Framework, there's government primary, secondary and ministerial statements. There's the WECA spatial plan, available land, funding, viability, which I'll come on to, which is very important, and the Local Plan, building regulation and the building inspector,ate which is a bit of a random subject (in terms of what we can get through the building Inspectorate when we go through a local planning cycle ).



Matt's covered this. So the process is basically B&NES puts up a proposal, goes through consultation, it's refined, lots of documentation is submitted to the plan inspector. It then goes through a quasi judicial process with the plan inspector, and he'll either accept or reject some of the stuff that Bath Council has put together, and then it's formally adopted. So the current Local Plan was formally adopted in January 2023. And we expect another one in another two years time, maybe. So it's typically a three, four year cycle.

## Viability

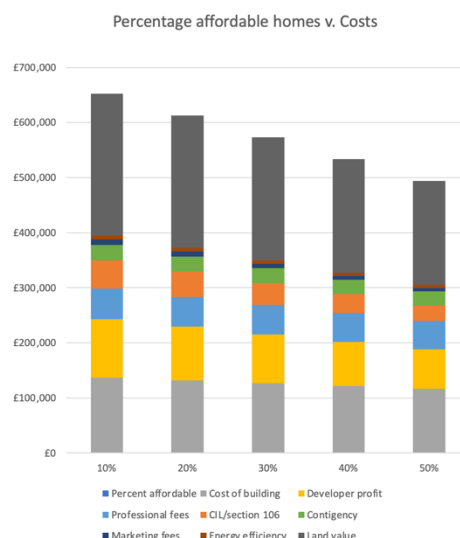
- 'Viability' is the main constraint achieving the highest standards for local housing
- Viability ensures that developments are viable for developers allowing them to make 20% profit, while delivering other benefits:
  - Affordable homes
  - High energy standard homes
  - CIL funding – funding to council to support the increase in population
  - Section 106 funding e.g. schools
- Viability studies are used in both the development of the local plan and new housing developments
- If sites are deemed unviable for developers, they are allowed to drop other commitments e.g. affordable homes



Viability. This is actually very important – it's a bit technical. You can't have everything you want. Developers are allowed to make a 20% profit on all their builds, and there are various rules around land prices which really constrain us from saying 'oh we want 60% affordable homes on development', because the developer would just come back and say 'we can't afford it' – we can't pay our Chief Exec £50M this year [which happened a couple of years ago] because he's going to be very poor otherwise.

## Viability: Affordable homes

- As the percentage of affordable homes increases developers replace 20% market home profits with affordable home 6.5% profits
- If they have already bought the land becomes less valuable
- From a profit and land value perspective they have an incentive to reduce the affordable homes

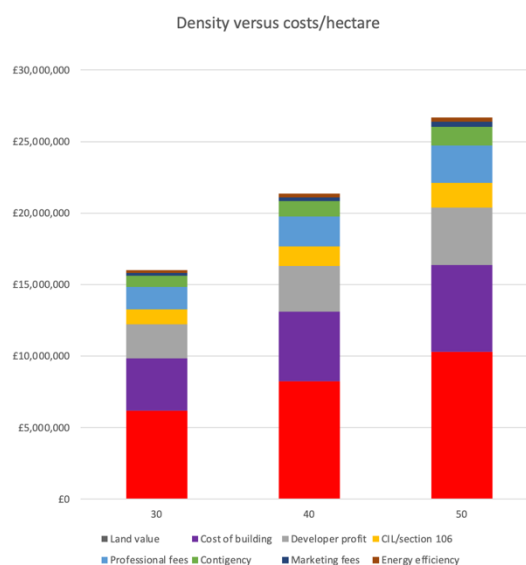


This is the level of affordable homes – as we push them up, developers’ potential profits go down. Because they are allowed to make 20% profit on a market home, but on an affordable home they are only allowed to make 6.5% profit. So they will work really hard to ensure they don't deliver any affordable homes.

And a lot of these big developments are in the hundreds of millions of pounds, and it's very attractive to them to throw expensive consultants at the process to argue their case against the Council. And so viability is really the real problem in this process.

## Viability: Housing density

- As housing density increases the profit and the land values both increase.
- The developer has an incentive to deliver as dense a development as possible within reason
- Higher densities mean less green/open space, fewer gardens
- Higher housing density means less land needs to be built on



Housing density. This is the number of homes per hectare, which is going up. There's an incentive with developers to push up the density of housing, so if there are more houses

on a plot of land, they make more profit. And to some extent, that would suit B&NES, because it has to find less land to build 30,000 homes.

Now the downside of that is you're not going to get green space in homes. At 30 homes a hectare you can sign about 30%/40% of that space as green space, perhaps parkland or trees. But as the densities go up, at this level, you get terraced houses, small back gardens, virtually no green space, and it becomes quite a car dominant landscape. So if you go up to Sulis Manor and look at that, that's relatively low density, but it's not very green. But on the other hand, if you look at the landscape of Georgian Bath, a lot of the terraced properties don't really have very big back gardens, so they were sort of quite dense in a way.

The title of this is the future city and greenness of Bath, but we're not going to get that is probably the answer.



## Viability: Main issues

- Recently developers have been offering low levels of affordability against the 30%/40% target:
  - 600 home Former Bath Gas Works 12%
  - 450 home Homebase/Pines way development 0%
- However, some developers have been proposing delivery:
  - B&NES Former Bath Gas Works: 350 homes 40% affordable
  - Hignett Family Sulis Manor: 300 homes 40% affordable

If this continues rather than needing to build 30,000

So the main issue is that we're not, at the moment, hitting our targets. So 600 homes in the former Bath gas works, with 12% affordable homes. The developer argued that the land was very valuable and they had to pay a lot for it, because they could have put a logistics centre on it – so an Amazon logistics centre in the centre of Bath, which is clearly not very reasonable. But the council accepted that as an argument because of the legislation which sits nationally, and that's a real problem, because we're building 600 homes, but it's not really contributing to our affordable housing targets.

So in terms of the 30,000 homes we've got to build, that's not reducing that 30,000 by 600 because we're not actually delivering many affordable homes. The Pines Way

development, which is replacing Homebase, is 450 homes. At the moment, they're offering no affordable homes. So we're not even we're not really chipping away.

There are some contrasts. B&NES are developing the other half of the former Gas Works, 350 homes for 40% affordable. The Hignett family at Sulis Manor are offering 40% as well, so it can happen. But the more aggressive developers throw a lot of consultants at the process and negotiate these figures down on the Council. And so this is a problem and a challenge for the council, because both of these developments are over £100 million, so it's worth spending a few £100,000 on the best consultants to maximise your profits.

## Viability: Conclusions

If this continues rather than needing to build 30,000 B&NES will need to build 50,000.

We can't have everything we want

Moral: B&NES needs to be more aggressive, turn down any application which doesn't meet a 30% to 50% affordable homes target



Our view is that we're not really reducing the number of target homes because we're not delivering affordable homes. So that's a problem. We'll still need to deliver 30,000 homes in 10 years time, even if we've delivered some affordable. You can't have everything you want because of all these constraints. So we can't have big parks in the middle of housing developments and we generally feel that B&NES need to be more aggressive with developers who aren't delivering 30–50% affordable homes.

# Housing Energy Standards

B&NES has the highest home efficiency standards in the UK



	Average UK Home	Current B&NES Local Plan	Future B&NES Local Plan	Future Homes Standard
Heat Loss kWh/m2/year	110	30	15	40
Annual Energy Consumption kWh/m2/year	160	40	30	70
CO2/kg/year	2400	180	140	920
	gas boilers	heat pumps, high levels of insulation, solar PV	heat pumps, high levels of insulation, solar PV, MVHR	no heat pumps or solar PV, MVHR?

I'm going to talk about housing energy standards. So outside East Lincolnshire, we should be very proud, as B&NES has the highest standards for new builds in the country. So this is the current standard. I'm talking about carbon, so the average home in UK has 2.4 tons of carbon emissions each year. The current standard in Bath is 180 so it's 90% less than your average home, which is very good.

And then for the next Local Plan, it's defined to be 140 which is slightly less, which is good, and almost Passivhaus standards. The government's proposed new standards, the future home standard, is potentially five times higher carbon than what we've got already. So what we really need to do is ensure that in the next Local Plan cycle, the inspector doesn't reject our really high standards. As I said at the beginning, we want to be really proud about Bath and where we are with that.

But this is potentially at risk because in the last planning cycle, when we got it through the planning inspector, Oxford Council put through a very similar proposal, and their planning inspector turned it down. And they are back at building standard, government building standards. And we know, for example, that the big developers are pushing to avoid having to store heat pumps and solar PV in the Net Standard, whereas at the moment, the current bar standard requires heat pumps and high levels of insulation, so PV.

I don't think we need to worry too much about our energy standards, because they're pretty good already, if we can get through a planning inspectorate in the next cycle.

## Embodied Energy: B&NES Policy SCR8

- Current B&NES Standard: 800 kg/m<sup>2</sup>
- Proposed standard: 500 kg/m<sup>2</sup>
- building a home is worth 500 years of its operational CO<sub>2</sub> emissions!
- Large developments currently coming in at 600 kg/m<sup>2</sup>, and using a lot of concrete
- Building 30,000 homes in Bath will add 200,000 tonnes CO<sub>2</sub>, **increasing B&NES CO<sub>2</sub> emissions over the next 20 years by 30%** - just in their construction



So this is a real big problem. This is embodied energy – that's the amount of carbon that goes into constructing homes – and the current Bath standard, which is very unusual (almost no councils, apart from Bath have this standard, which is 800 kilograms of CO<sub>2</sub> in the construction of homes per square meter of floor area.) The new standard, I think, is pushing it down to 500.

But, and this is the big but, the building of a home is equivalent to 500 years of the operational emissions of that home. And so it's a really big number, and we feel that number needs to push down further. But the question is, is that viable? Because that's moving away from concrete homes to wooden homes, which is the easiest way of putting it. But building 30,000 homes will add 30% to our carbon emissions in just the building of them. And so in some ways, this is actually a more important thing than the operation or the efficiency of those homes.

## Other policies

- No Change of Use policy: developments have no local standards to meet
- HMO EPC C requirement for newly license HMOs (MEES)
- Co-living spaces
- Parking: reduces densities, encourages congestion
- Property tax: low occupancy of homes by older generation



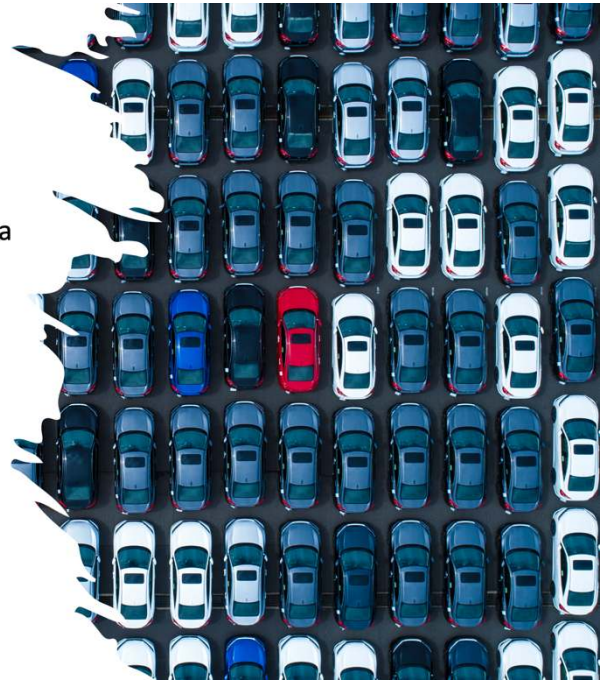
So we don't have a change of use policy in terms of energy standards. So a lot of old office buildings are being converted into homes. B&NES owns a lot of flats above shops in Bath. They're not being insulated particularly well. So that's a challenge. Co-living spaces come up as a consultation at the moment. I think that's probably quite a good idea for dense housing. With co-living spaces, where it's a bit like houses with multiple occupation, you have lots of bedrooms around some sort of common core infrastructure, like kitchens and living rooms, so it provides dense, relatively low cost housing for younger people, let's say.

I think we should be tougher on parking, so we have a parking standard, but if you go to these dense developments, like Sulis Manor, you'll find that probably a third of the area is covered with cars parked outside, because you've got the density of houses and people want cars. The question is, could we develop a standard where people can't have cars? We would put them on suitable bus routes, and there could be car clubs for when they need to use cars. I think we should be pushing that, and that means we can get higher density housing because cars are taking up space that the houses could be built on.

Another tough one is property tax. We have an older audience here and one of the reasons we're having to build more homes is we've got lots of old people living in big homes. Is that an efficient way of managing your housing stock?

## Infrastructure

- B&NES has 85,000 homes; 30,000 additional homes require in next 20 years a 35% increase
- Additional pressure on:
  - Schools
  - Medical facilities
  - Transport
  - CO2 emissions
- Productivity: aging population and lack of improvement in productivity driving need for immigration

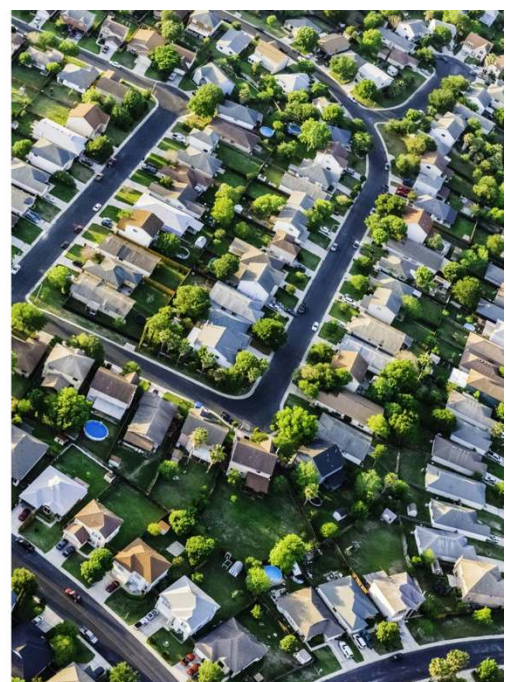


So we've got 85,000 homes at the moment, and as Matt said, we need 30,000. This brings lots of pressure on schools, medical facilities, transport and CO2 emissions, and those all have to be addressed within the planning process.

The underlying issue I feel is productivity and people coming out of the workforce. We've got quite high levels of immigration to keep us all alive when we get older. I think it's probably the easiest way of doing it, and that immigration is putting pressure on housing demand, and that's part of the issue. And if we were a bit more productive and more of us were in work, maybe that would be one way around this problem.

## Conclusions

- Building 30,000 homes in B&NES will be a challenge for finding sites and the impact on local infrastructure
- Energy standards for new builds are very good
- NIMBYism is going to be a challenge
- The council needs your support, feedback but it needs to be realistic
- Need to balance housing density versus green space versus urban sprawl
- Delivering high percentage of affordable homes critical



So, in conclusion, building 30,000 homes is a challenge. I think the energy standards are pretty good, so I wouldn't worry too much about that, apart from the carbon emissions involved in building properties. NIMBYism is a big challenge. We've seen that as soon at Sulis Manor with the Phase 3 and 4 development – it looked like quite a good application, but it got turned down. And it's an obvious place to build, but if we have lots of these and if we can have to build 30,000 houses, then there will always be people not liking them next door. And I can understand that.

The council needs your support and feedback with this process. Part of the reason we got through the last Local Plan with such high standards was with community support. So there were five or six of us turned up at the inspectorate examination and represented supporting the Council, and we need to be delivering a high percentage of affordable homes.

Let's go back to something Matt said, 'Are we actually delivering affordable homes?' Because at the moment, the definition is 80% of market value, and the homes in Sulis Manor are going for a million. So an affordable home up there will be £800,000. That's not affordable! And that is not reducing the government requirement for affordable homes.

**Paul Pearce, Green Infrastructure Programme Manager Bathscape**

*Film: The Landscape City of Bath*

<https://vimeo.com/454710788>



## Bath Future City: A Landscape City

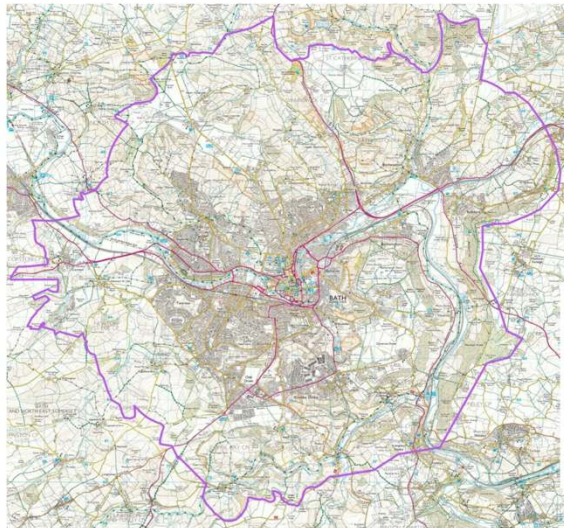
Paul Pearce  
Green Infrastructure Programme Manager- Landscape City  
Bath and North East Somerset Council

Okay, that was a nice, feel good interlude, so hope you all enjoyed that. It's a great reminder of how lucky we are to live here, and of partnership working. I work at Bath and North East Somerset Council. I've recently taken on working on the Bathscape programme and we're now taking that to the next stage and developing an initiative called Landscape City.



How many people have heard of Bathscape here?

Brilliant – so either it's a very well-informed audience, or we're doing our job very well, I don't know, but hopefully a little bit of both. So yes, it's a partnership. It's very much about partnership. It's funded by National Lottery Heritage Fund. It will have been running for seven years by the time it finishes next year. We had a bit of an extension because of that thing called COVID, which meant that we couldn't do all of our community engagements. The partnership is led by B&NES, but we're working with the National Trust, the Avon Wildlife Trust, with the universities, Cotswold National Landscape, and all the rest that you can see up here.



### Restoring

- Improve management of grassland and woodland
- Assessing important viewpoints
- Creating new flower-rich meadows
- Surveying archaeological sites
- Advisory service for landowners.

### Understanding

- Themed walks
- Volunteer /community training
- Rural skills training
- Family nature watch sessions
- Student placements
- Targeting communities of highest need

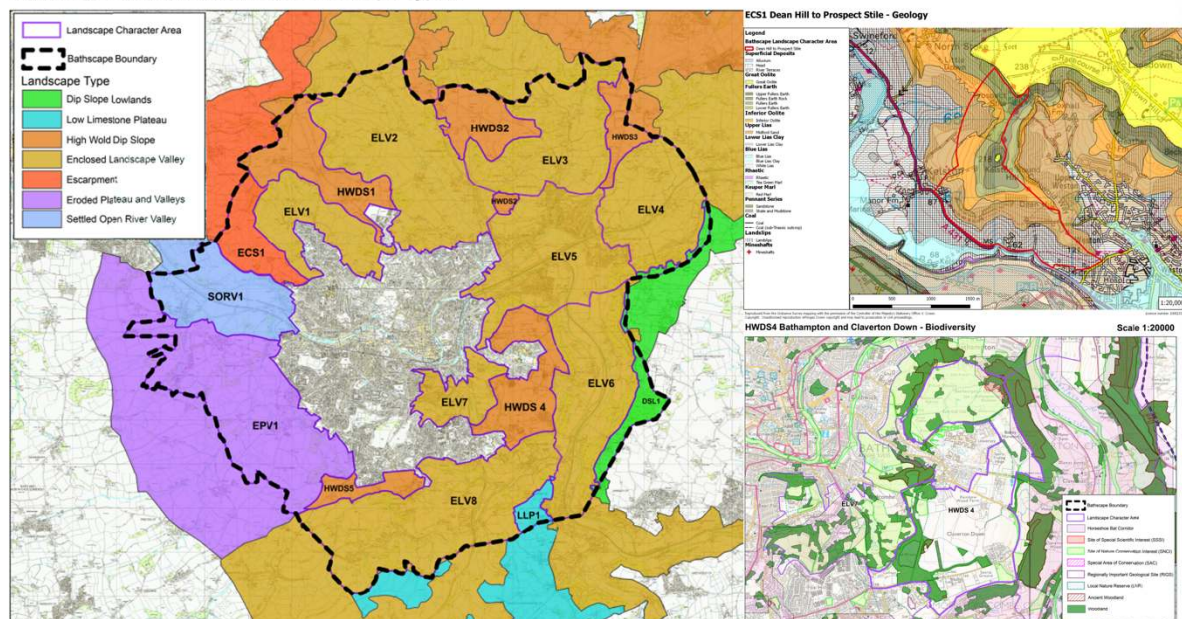
### Exploring

- Improve pathways
- 20 mile circular path
- Activities in parks
- Annual Walking Festival
- Trail guides & video trails
- Weekly guided health walks

There's the purple line, and this covers more than the city centre, from Batheaston, over to Bathford in the East, right over to Corston in the West. And it covers that World Heritage Site setting.

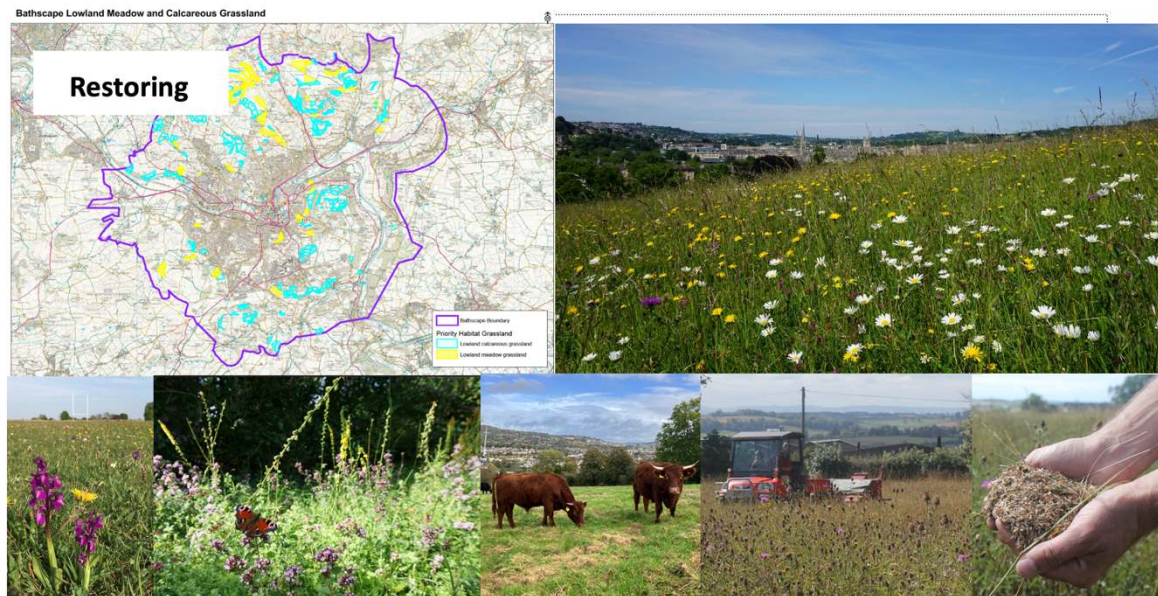
We have three themes. Restoring that landscape, understanding the landscape, and then finally, encouraging people to explore it in new ways.

#### Bathscape Character Areas and Landscape Types



So we all know that the landscape is really important. We all want to live in houses that have views of it, or we all want to spend time in places with views of it. But it really is

special because of the geology and the topography, so that every time you look out of a window in Bath, most windows, anyway, you have a fantastic view, and the landscape really comes down into the city in a way that it really doesn't in many other places.



So under the restoring theme, that limestone geology that we have means that we've got some fantastic grassland sites, calcareous and neutral grasslands that are potentially really rich for biodiversity. And we've been working with landowners to advise them on managing their sites more effectively. We have worked with 69 landowners over the last six years, created 19 new wildflower meadows – but there's still so much more to do. So if you know anybody that's a landowner who has got a bit of grassland they want managing, then talk to us, because there's so much more that we can do.



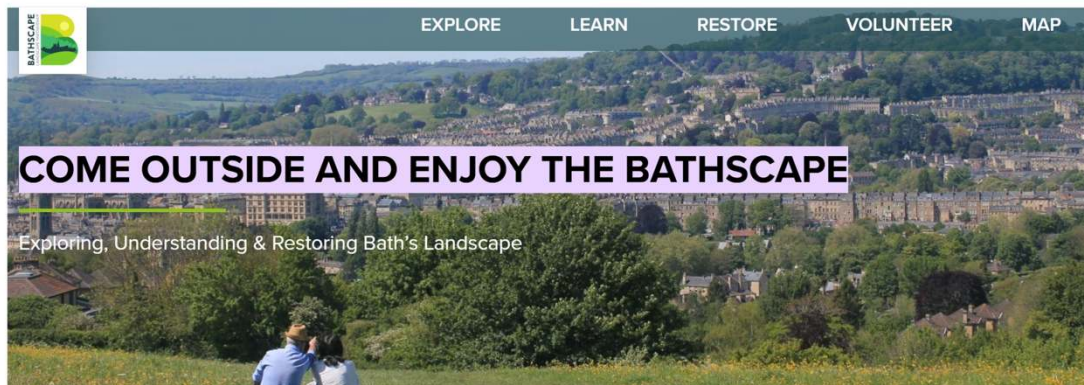
Woodland. So there are more trees in the Bathscape landscape than there probably were 100 years ago. But although that woodland isn't being actively managed, it's not not as good for wildlife as it could be. And we've got new threats. We've got ash dieback, which has arrived in the last couple of years. Back in the 1970s, we lost a lot of trees and areas of woodland because of Dutch Elm Disease. And then, going forward, climate change is going to have a potentially big impact on our woodland landscape. And we've been advising landowners on woodland management.



Understanding – we have a big emphasis on encouraging people to get out and explore and get the benefits from that landscape, particularly in the more deprived areas of Bath. So we've run events, we've run guided walks, we run health walks every day of the week – it's something like 2000-3000 people a year who are involved in our health walks, and all sorts of other initiatives as well. We've had about 20,000 people come to our events over the last six years and lots of conservation volunteering, 180 volunteers and 3000 days.

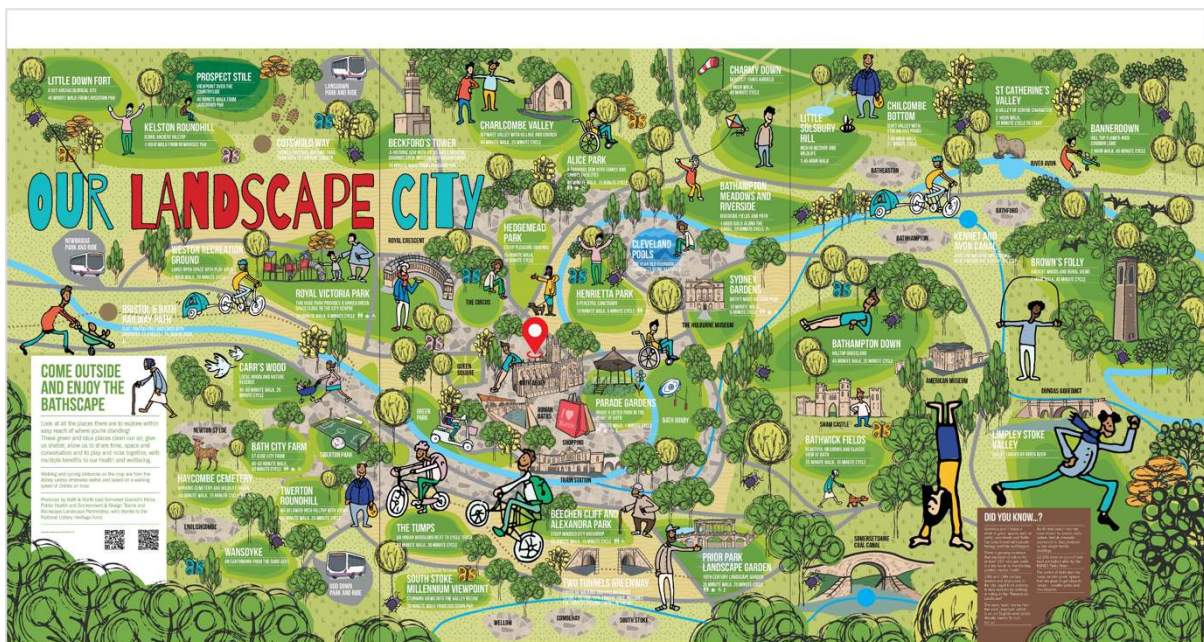


The final theme, exploring. So encouraging people to get out and explore that landscape, and making that easier to do, making that more accessible, so better signage, better access, particularly working with Cotswold National Landscape partners on this. We run the Bathscape walking festival every year, with about 1000 people a year involved in that. And there's a new Circuit of Bath, which will take you all the way around, 20 km, right around the perimeter.



Bath is a landscape city. Rich in geology, wildlife, history and heritage, the Bathscape area is yours to discover and enjoy. Hills, valleys, grasslands and woodlands, there's so much to see, and it's all within easy reach of the city centre.

The Landscape City idea came out of that recognition that the landscape in Bath is as important as the built Georgian landscape. I always try and say rather cheesily that people come to Bath to visit the Roman Baths or the Royal Crescent, but they fall in love with Parade Gardens or the Skyline. And we all know that it's important to the people that live here – it's important for the economy, but it's also very important to the people who live here, for all the sorts of benefits that we get from that landscape.



I touched on partnership, and this is crucial.

This was a map that we produced just after COVID to try and capture all the different partners that are helping to manage the landscape, helping run community projects within the Bathscape area. So, you've got the friends of Alice Park Community Garden up here. You've got Bath City Farm down here. You've got Smallcombe Nuttery down here. So the landscape is very special, but it's extra special because of all of the partners that are helping to nurture and manage and engage people with it.

### The Bathscape Partnership



### Bathampton Meadows



I talked about how Bathscape is a formal partnership that's running projects, but I think it's that partnership approach, it's that recognition of the importance of the landscape that has also helped to foster lots of other initiatives. So for example Forest of Imagination, it's all about art and discovery, focused on nature and the environment.

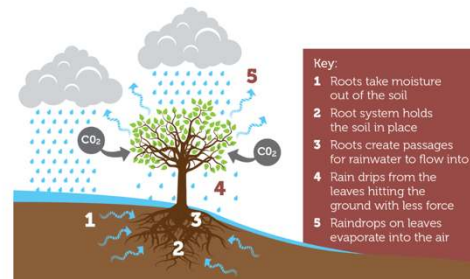
You've got the Bath Preservation Trust's Biophilic Bath talks, which are fantastic. And we've been able to support initiatives like Bathampton Meadows, where the National Trust has taken on the area of meadows, and is now managing it effectively as an Urban Nature Reserve.



### Why is Bath a World Heritage Site?

UNESCO World Heritage Sites are places of cultural or natural significance which are considered to be of importance to all of the global community. We conserve them for this and future generations.

The City of Bath is exceptional in having two UNESCO inscriptions. In 1987 it was inscribed for its Hot Springs, Roman archaeology, Georgian buildings and natural landscape setting.



I touched briefly on the benefits to us of that landscape. The landscape is incredibly important to the local tourist economy. This was an article in The Sun online where Bath was recognised as being one of the top 20 best cities in Europe to visit. There were no other British cities.

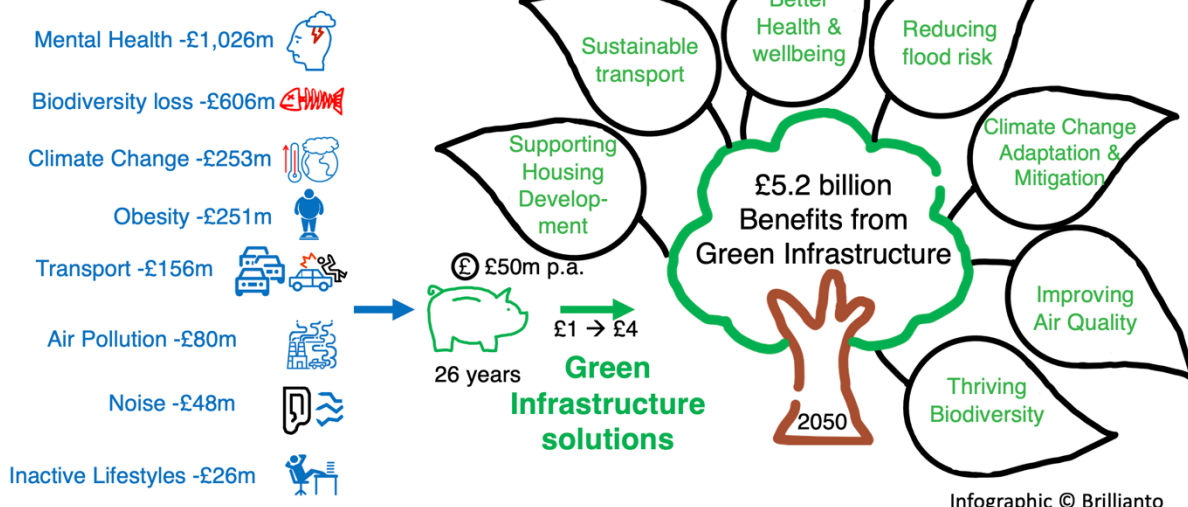
They talked about the cultural scene, the Georgian architecture, but also the countryside walks. So people come to visit the Roman Baths, but then they go on to a walk on the Skyline, or up to Alexandra Park.

You know that landscape is important in terms of climate resilience, in terms of helping mitigate climate change, managing those grasslands properly, and those woodlands storing carbon and all the rest of it, but they're also going to be key in the future, as we have lots more extreme weather events, trees capturing that rainwater, stopping it flooding our streets.

I don't know if you saw when we had the recent spate of heavy rainfall – there were number of incidents over the winter, but Bathampton Meadows was completely flooded, and it did exactly what it was supposed to do, capture all of that and slowly release it into the rivers and prevent that flooding.

### Making the Case for Investment in Green Infrastructure in Bath and North East Somerset

8 sustainability challenges cost  
BANES GDP £2.5 Billion p.a.



We've tried to put a value on those benefits. And I don't need to tell anybody in this room that nature is good for you. But this is our next challenge, to try and make the case for investment protection and investment in that landscape.

We commissioned a study that looked at some of the key sustainability challenges to growth in B&NES. You can argue whether or not growth is a good thing or a bad thing, and I'm not going to get into that argument – but we were able to make the case that there were some key barriers to that growth, and key barriers to the sustainability of the economy, and actually the landscape can play a can play a part in addressing those.

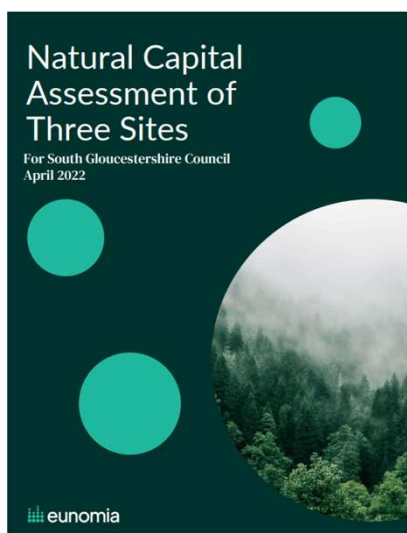
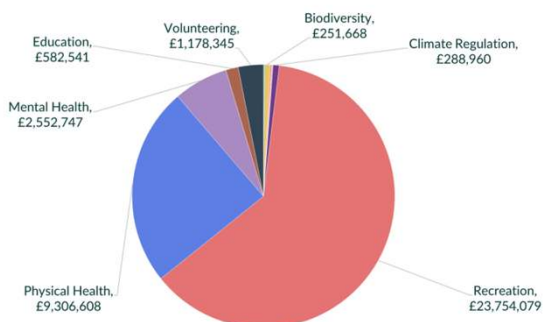


Figure 9 Grimsbury Farm, Monetary Value Future Option 3, NPV 100 years



Natural capital and ecosystem services.

So South Glos Council, a couple of years ago, looked at one of its sites, a place called Grimsbury farm, a community farm. It was costing the council something like £70,000 a year to manage the site as a piece of public open space and it wasn't generating any income. So in a way, it could be seen as a bit of a loss, could be seen as an income drain on the council. So they got some consultants to try and put values on some of those ecosystem services that the site was providing. They looked at the benefits from biodiversity; they looked at the benefits in terms of improving people's health and well-being and reducing the number of hospital visits they would need. They looked at climate regulation, and they found that it was worth far more from all of these benefits, that far outweighed the £70,000 a year that it's costing to run it as a piece of public open space. They were able to make that argument that actually we want to keep this site, and we want to keep investing in it using this ecosystem services approach.



Conduct an Ecosystem Services Assessment (ESA) of the project area to provide information about the services provided by the natural environment - what the services are and the monetary value of those services to nature, public health, climate mitigation, economy etc

- This will enable the council to calculate values into the site masterplans, justify investment in nature based schemes and support funding bids where valuation of benefits is required.
- It will provide evidence for Local Plan policies that support nature recovery.


Through the landscape city we're going to do that. We're going to do that looking at the Bathscape landscape, and starting to quantify those ecosystem services across the landscape.

### Next Steps for Entry Hill

**The former golf course at Entry Hill is an important part of Bath's Green Infrastructure Network.**


We know that its grassland and trees provide essential habitats for wildlife; its open spaces are cherished for fresh air, relaxation and contact with nature and its landscape stores carbon and rainwater and helps create the green setting for Bath's World Heritage Site.

We also know that there are potential partners within Bath and North East Somerset that share our vision for protecting the landscape at Entry Hill while providing new opportunities to discover nature, learn new skills and help tackle the Climate and Ecological Emergencies.



So, we will be inviting potential partners to work with Bath and North East Somerset Council to design and manage a space where people and nature thrive based on the following principles:


- Providing publicly accessible walks and accessible routes for the communities of Bath and North East Somerset.
- Helping protect the landscape and its ecology and contributing to the wider ecological habitat network and species recovery.
- Providing opportunities for learning, discovery and enjoyment.
- Respecting landscape character and protecting the World Heritage Site setting.
- Helping meet the costs of maintaining the site to keep it safe and financially sustainable.
- Helping improve the health and wellbeing of Bathnes residents.



**Proposed Strategy**

**Sculpture / Art in the Landscape**

The special nature of the site and its topography means it is perfect to showcase large scale sculpture in the landscape alongside smaller interventions around the site.




#### World's Largest Lesson


**Key Objectives**

1. To create a large-scale sculpture in the landscape.
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10. To create a large-scale sculpture in the landscape.

**Key Messages**

- The sculpture is a large-scale intervention in the landscape.
- The sculpture is a large-scale intervention in the landscape.
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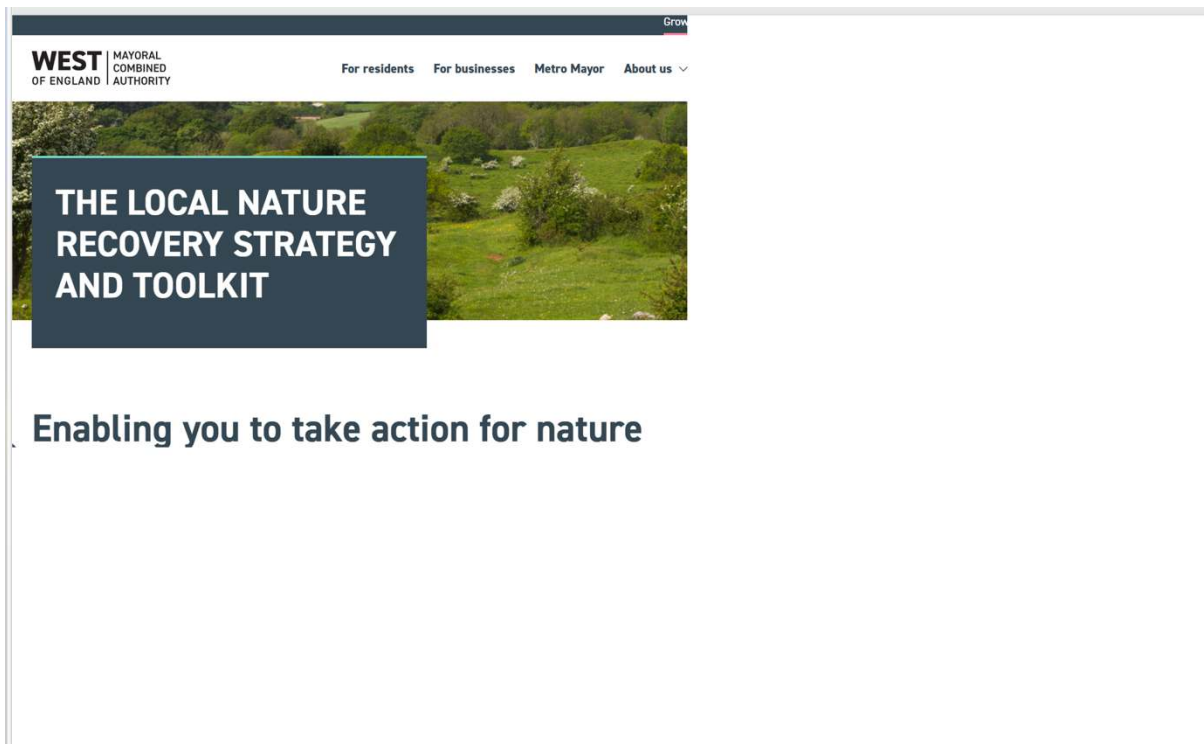
And through Landscape City, we also want to promote the benefits to communities from the open spaces that we have and the landscape. We're looking again at Entry Hill, the former golf course site, and various partners have come forward to us and said, wouldn't it be great if it was a flower farm or a community farm, or could be rewilded, or it could be a center for nature, discovery and art, or part of a cycling route, and all those sorts of things. So what we want to do is look at sites like that.

So we want to look again at some of these sites and create exemplars that help deliver all these benefits that we're talking about.



Partnership. We also want to be supporting partners that are delivering the spaces more effectively. So we will be working with a couple of sites at Charlcombe and hopefully Lincoln Hill Fields to help support those groups, but also look at re branding those sites, or re-designating those sites as local nature reserves, to give them that extra protection, to give them those extra opportunities for funding.

I often think about our closed cemeteries around Bath, and how lots of them have rewilded themselves to some extent and effectively become urban nature reserves. So I'd like to see if we can work with the teams that manage these spaces and the volunteers and the people that use them, so that these sites can be managed bit more sensitively for wildlife, so that they're good for past, present and future generations.



### So Local Nature Recovery Strategy

It's the first Local Nature Recovery Strategy in the country and it covers the West of England. We've done this in partnership with South Glos, with Bristol, with North Somerset, with WECA. And it's mapped all of the priority habitats that we have for wildlife across the district. So it's mapped all the best bits, and it's identified areas where we could be connecting spaces to create larger, better, bigger, more joined up habitats. So it's produced a map and a toolkit. You can look at that online, and it'll show you how you can click on Lyncombe Hill Fields, and it'll tell you what's important about that habitat, and then it will also give you a little bit of advice about how that habitat can be managed more effectively and some of the species that you'll find.

Further down the line, there's going to be a series of eight programmes that will be action plans for delivering this Local Nature Recovery Strategy. There'll be a plan for woodlands, a plan for grasslands. We'll be looking at how we monitor these sites more effectively, and how we support that monitoring through things like citizen science. So, do just Google Local Nature Recovery Strategy.



I wanted to finish on a question, and that is how can the council best support Bath to be a landscape city?

## **Bath Future City – Q&A: a summary of the themes**

The questions and answers, following the main presentations from the three speakers (Councillor Matt McCabe, Philip Haile/Transition Bath, and Paul Pearce/Bathscape), discussed the challenges and solutions for housing and environmental sustainability in Bath.

Key points included the need for better monitoring of new building standards, the impact of developers' practices, and the Council's efforts to build new homes in the region. The conversation highlighted the importance of community involvement in planning, the potential for higher housing density, and the need for national standards to ensure job opportunities in construction. The discussion also covered the balance between housing and nature, the potential for subdividing houses, and the role of ecosystem services in funding green spaces.

## **Outline of questions**

A speaker shared concerns about the quality of new buildings, citing personal experience with a new property at Sulis Manor, and the lack of monitoring post-construction. Criticism was levelled at developers for changing plans without Council approval, leading to significant deviations from the original plans.

Councillor Matt McCabe explained the most recent Local Plan update and the challenges developers face in meeting new standards, including the practice of value engineering to reduce costs.

A speaker provided an example of a developer changing window details to avoid compliance, highlighting the devious tactics used by some developers. Also the use of fake stone in construction, emphasising the lack of environmental concern among developers.

Councillor Matt McCabe discussed the Council's efforts to build social housing and the challenges of land, cash, infrastructure and skills. He mentioned the council's aspiration to own 1000 units by 2033 and the need for national standards to ensure job opportunities in construction education.

A speaker criticised the government for not enforcing higher standards, citing the influence of large developers and the lack of effective rent controls.

Councillor Matt McCabe acknowledged the role of market demand and the need for more rental units to reduce market pressures.

A speaker raised concerns about community involvement in development decisions and the need for societal discussions on trade-offs between housing and environmental values.

Councillor Matt McCabe explained the consultation process for housing and the challenges of balancing public engagement with developer interests.

Also discussed were the limitations of the Local Plan and the impact of high court decisions on public consultation. Also the need for democratic input into the planning process and the potential loss of public discourse due to relaxed planning laws.

Also the lack of biodiversity considerations in Green Belt policy and the importance of local initiatives in sustainable development.

Another speaker argued for higher housing density to avoid building on other fields and the inevitability of denser developments due to government targets.

Another speaker emphasised the importance of quantifying ecosystem services to make informed decisions about landscape management.

Another speaker suggested providing free consultancy on subdividing houses to create more affordable housing, but acknowledged the bureaucratic challenges.

Philip Haile explained the complexities of listed building consent and the need for standardised processes to facilitate subdivision of larger homes.

Another speaker called for a new order of governance that involves local communities in managing their environment and representing all life forms.

Another speaker urged the Council to have a visionary approach to nature recovery, citing the UK's status as a nature-depleted country. Suggested converting Green Belt land into wild belts and creating large-scale nature corridors, inspired by examples from Sussex.

Councillor Matt McCabe compared Hove's high-density housing with mansion blocks to Bath's lack of such developments, highlighting the potential for better urban planning

Another speaker discussed the need for active management of woodlands and other green spaces to enhance biodiversity and community benefits.

Another speaker stressed the importance of including local communities in managing their part of the landscape and the role of partnerships in decision-making.

Another speaker stressed the importance of including local communities in managing their part of the landscape and the role of partnerships in decision-making.

Another speaker enquired about the percentage of new houses in Bath, with Matt McCabe explaining the limited capacity for housing in the city.

Another speaker asked about the Council's powers to restrict tenancy in new developments, with Matt McCabe mentioning the potential for a tourist tax for hotels and Airbnbs and a register of rented properties.

**Thank you to our speakers**  
**& to everyone for coming!**



**Transition Bath**  
climate · community · future