

**Bath and North East Somerset Council Local  
Plan (Core Strategy and Placemaking Plan)  
Partial Update Examination**

Hearing Statement submitted on behalf of St  
William Homes LLP in relation to Matter 3 –  
Housing Land Supply

Policy SB8 Bath Riverside

June 2022

# Contents

---

1.	Introduction	3
2.	Response to Inspector's Questions	7
3.	Concluding remarks	9

---

**Appendix 1:** Draft Statement of Common Ground between St William and BANES

---

Tim Burden  
tim.burden@turley.co.uk

**Client**  
St William Homes LLP

**Our reference**  
STWR3004

June 2022

# 1. Introduction

- 1.1 This Hearing Statement has been prepared on behalf of St William Homes LLP ('St William') in response to Matter 3 (Housing Land and Supply) of the Bath and North East Somerset ('BANES') Council Local Plan Partial Update ('LPPU') Examination.

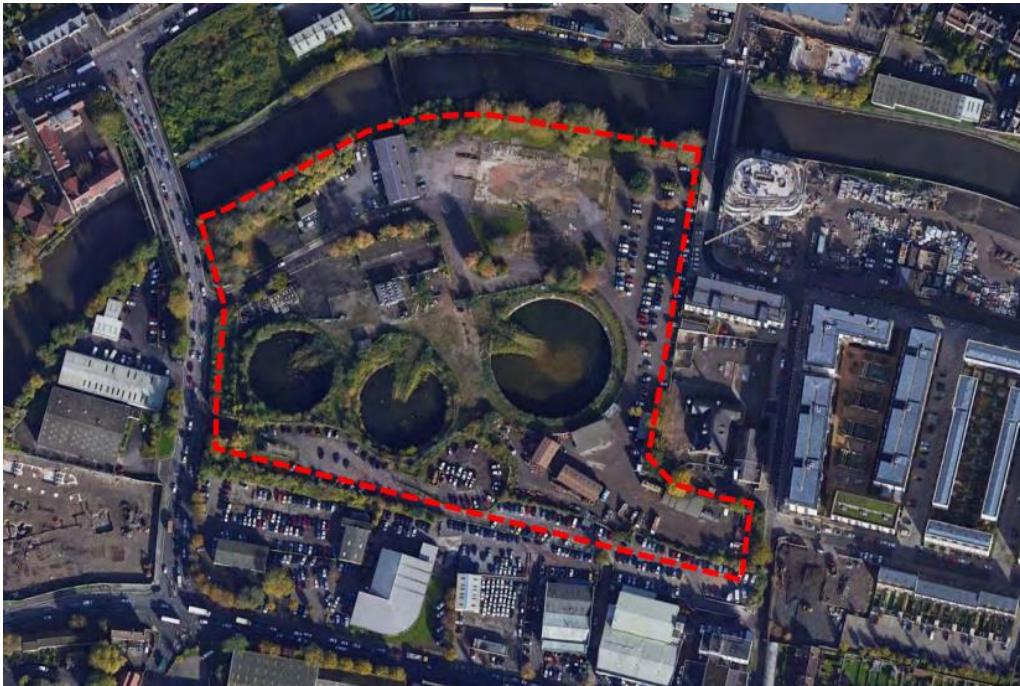
## **About St William**

- 1.2 St William was formed in 2014 as a joint venture between the Berkeley Group and National Grid to regenerate underutilised gasworks and gasholder sites, including Bath Gasworks.
- 1.3 St William has unrivalled experience in successfully regenerating sites of this nature and transforming them into places where people want to live, work and spend time. This experience includes an acute awareness of the technical complexities and costs that redeveloping former gasworks sites entail.
- 1.4 St William is the majority landowner for the remainder of the Bath Riverside allocation and are therefore the key partner in completing the long-anticipated regeneration of BWR.

## **About Bath Gasworks**

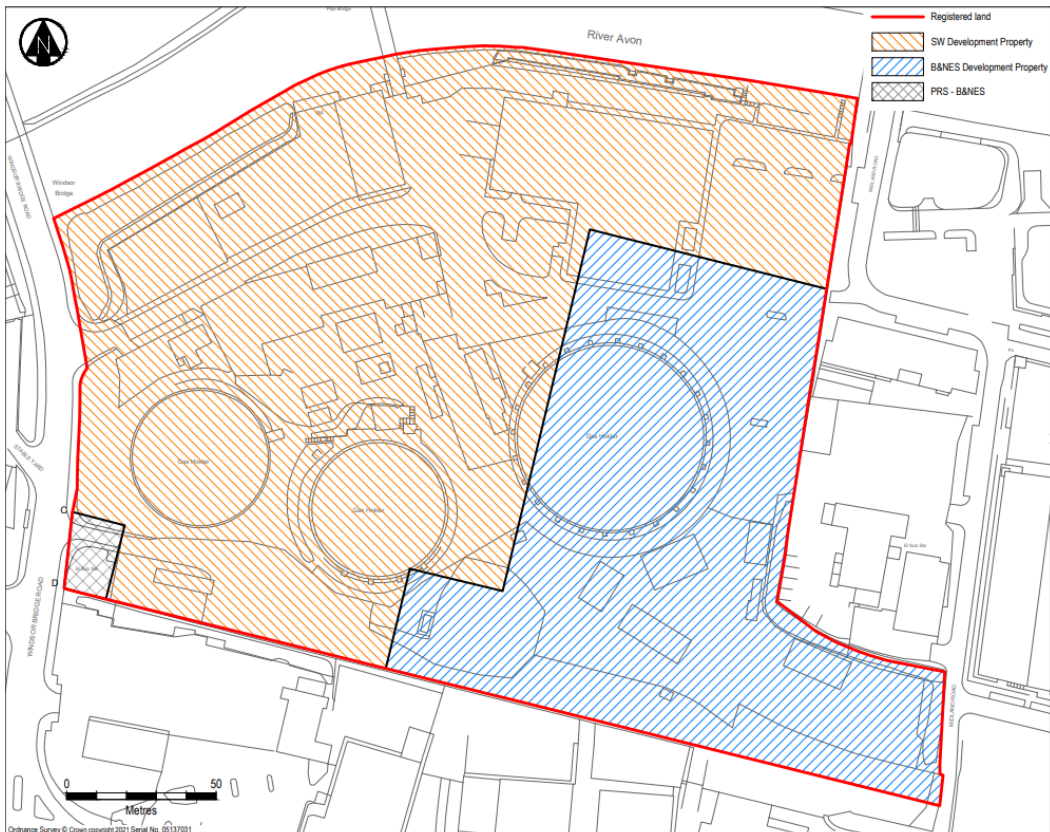
- 1.5 Bath Riverside forms the largest development site within the wider Policy SB8 allocation. The site is jointly owned between St William and BANES Council reflecting the former operational gas infrastructure of Wales & West Utilities and the legacy gasworks site.
- 1.6 The Council have just completed a comprehensive programme of gas pipework rationalisation, relocating the main Bath supply pipework and relocating gas infrastructure to facilitate development.
- 1.7 St William and the Council have contracted to swap land to regularise development land for both parties in order to deliver development.

**Figure 1: Wider Bath Gasworks site**



- 1.8 St William owns land ('Bath Gasworks') which forms part of the wider Bath Western Riverside ('BWR') site, which is currently allocated for redevelopment under Policy SB8 of the Placemaking Plan (adopted July 2017), and is subject to proposed amendments.

**Figure 2: BANES and St William's land interests at Bath Gasworks**



- 1.9 The St William development land is approximately 3.33 hectares in area located at the former Bath Gasworks located to the west of Bath City Centre.
- 1.10 The Site is bound by the River Avon to the north and the Wellsway Garage development (ref: 20/03071/EFUL) and the A36 to the south.
- 1.11 Midland Road and Windsor Bridge Road form the eastern and western boundary respectively.
- 1.12 The Council controls the adjoining development land which is approximately 1.8 hectares. The Council plot is bound by the Wessex Water Pumping compound to the east, and existing Brunel Ford/Kia dealership to the South and connects to the completed development phase of Bath Western Riverside by Crest.
- 1.13 The wider allocation land comprises of brownfield land in a variety of different ownerships, part of which is controlled by the Council.
- 1.14 The wider BWR site was subject to an application submitted by Crest Nicholson in 2006 and which was granted outline planning permission on 23 December 2010. St William was not party to this application but that application did include their landownership.
- 1.15 This approved description of development is as follows (Application Ref. 06/01733/OUT):
- “A new residential quarter including up to 2281 residential homes and apartments (Class C3); up to 675 student bedrooms and associated communal areas (Class C3) (or alternatively up to 345 student bedrooms (Class C3) and a primary school (Class D1)); local shops, restaurants, and other community services and facilities (within Classes A1, A2, A3, A4, A5, D1); construction of new bridges, roads, footways and cycleways; associated infrastructure and facilities; accommodation works; and landscaping”*
- 1.16 Development has now been completed on the Crest Nicholson part of the site delivering 840 new dwellings. There have been a variety of reserved matters applications and amendments to the outline application over the intervening period including the consent for 184 dwellings to the north of the river on the Council waste recycling centre and the consent for the residential led redevelopment of the Dick Lovett site, situated to the east of Windsor Bridge Road and the north of Lower Bristol Road. St William and the Council both intend to submit new full planning applications for the redevelopment of their controlled elements of the Gasworks site.
- 1.17 The Westmark site to the east of Windsor Bridge Road and immediately to the south of Upper Bristol Road is also part of Policy SB8.

### **Context**

- 1.18 The proposal for an updated site-specific allocation policy for the remaining elements of Bath Riverside in the LPPU, Policy SB8, which responds positively to the balance of the existing allocated site, is supported in principle by St William.

- 1.19 As has been noted in St William's Regulation 19 representations, it considers that the existing policy is based on out-dated national policy, an evidence base that is now well over a decade old, and out-dated local circumstances surrounding land availability, viability and infrastructure need and requirements. There have been clear material changes in circumstances since the original granting of outline permission for the wider site, the site's existing allocation in the saved policies of the 2007 Local Plan, and more recently the site-specific policies in the Core Strategy and the Placemaking Plan.
- 1.20 Several meetings have been held between St William and the Council over the period since 2018. St William is committed to collaborative partnership working with the Council in order to realise development on this site and see the delivery of much needed new homes. Two public exhibitions were held in February 2022 and May 2022 respectively (see [bathgasworks.com](http://bathgasworks.com)).
- 1.21 St William welcomes the opportunity to participate in the Matters 3 and 4 hearing sessions taking place on 21 and 22 June respectively.

## 2. Response to Inspector's Questions

- 2.1 This section sets out our response on behalf of St William to the questions that have been raised by the Inspector in his Matters, Issues and Questions Paper issued on 14 April 2022. We provide written responses to questions Q14 and Q15.

### **Matter 3: Housing Land and Supply**

**Q14) The Council has confirmed in its letter of 7 March 2022 (B&NES 1) that the intention of the Plan is to provide a five-year supply of housing sites on adoption. What is the evidence that there would be a five-year supply of deliverable housing sites on adoption of the Plan as per the requirements of the NPPF?**

- 2.2 The Council's ability to successfully deliver an ongoing demonstrable housing land supply will depend on it securing optimum delivery of new homes on allocated sites. A rolling five year supply will be needed throughout the plan period, and indeed, is one of the reasons that the LPPU has been prepared.
- 2.3 The Bath Riverside site is a key part of the Council's spatial strategy and will underpin the Council's housing land supply, as it has been through the delivery of the early phases.
- 2.4 The wider Bath Riverside allocation of around 1,750 new dwellings is a significant component of the overall housing land supply proposed in the LPPU. Policy B1 (Bath Spatial Strategy) proposes some 7,020 new homes over the Plan period within Bath, with the SB8 site representing some 25% of that total. It represents some 13.5% of the overall District housing requirement identified in the Plan, which seeks to deliver about 13,000 dwellings across the administrative area (Policy DW1).
- 2.5 There are site specific challenges given the historic uses and brownfield nature but St William and the Council are wholly committed to progressing this development, to help shape a new neighbourhood alongside the existing community. This will bring with it a suite of important benefits for the city, not least remediating a contaminated Gasworks site which is underutilised and a visual blight.
- 2.6 It remains the intention for St William to submit a full planning application for their site in summer 2022. Good progress has been made towards achieving this with a full consultant team now in place, and the Environmental Statement has been subject to a Scoping exercise.
- 2.7 Beyond this, and subject to the time it takes to determine the planning application, the aspiration is to begin redevelopment on the site in summer / autumn 2023. New homes could, therefore, be ready for occupation on the St William site before 31 March 2025 if the development management process facilitates a swift decision.
- 2.8 It is consequently noted that the delivery of the vast majority of our homes will fall into the remainder of the Local Plan period.

Within the draft SoCG, amendments to the policy were agreed with the Council to reflect the importance of the SB8 site, that the development principles relate to the

whole site, and to reinsert the words 'high density' to reflect the wording of the currently adopted version of policy SB8 and the net additional 250 dwellings proposed on the site.

***“Development Requirements and Design Principles***

***Collectively, across the entire SB8 area, development proposals will:***

*1 Deliver **high density** residential development of around 1,750 dwellings across the whole site. Proposals for Purpose Built Student Accommodation shall not be permitted.”*

**Q.15 Do strategic policies include an up-to-date trajectory illustrating the expected rate of housing delivery over the plan period as per NPPF paragraph 74?**

- 2.9 This is a matter for the Council to respond to. The importance of the ongoing ability of the Bath Riverside site to deliver over the long term cannot be underplayed.
- 2.10 There is a pressing need to make sure development now comes forward on this site, given the contribution of Bath Riverside to overall housing supply.



### **3. Concluding remarks**

- 3.1 St William remain committed to working with the Council to deliver this important site. We hope that the aforementioned comments assist the Inspector in relation to his specific questions.