



BATH RESIDENTS
Federation of Bath Residents' Associations

15 August 2019

Mr Gwilym Jones
Consultant Planner
Development Management
Bath & North East Somerset Council
Bath
BA1 1LG

Cc: Development Management

Dear Mr Jones

Arena 1865 EIA Scoping Report (19/03133/SCOPE)
Comments by Federation of Bath Residents' Associations (FoBRA)

In your letters of 1 August 2019 to both the Pulteney Estate Residents' Association (PERA) and the Widcombe Association (WA) you have stated that the agents Turley, on behalf of Arena 1865, was misleading in suggesting that the Local Authority may consult with a range of organisations, not just statutory consultees, that may include these two RAs and their umbrella association, the Federation of Bath Residents' Associations (FoBRA). In our view, Turley was absolutely right to make this suggestion because it is important that the residents of Bath, especially those closest to the Rec, can consider and comment on the efficacy and accuracy of the submitted EIA Scoping Report. This is a unique situation: no development proposals in Bath have taken place under the current EIA regulations in a location that so affects the Georgian centre of the WHS city of Bath and its setting.

We recognise that the scoping report should identify all the potential environmental effects of the plan to re-develop the Rec and is not the full planning application; thus the comments that follow are restricted strictly to the scoping report that will inform the EIA.

PERA has submitted a comprehensive and compelling forensic analysis of Arena 1865's EIA Scoping Report and FoBRA fully endorses their view that their comments should be fully considered by Council officers, not least taking account of public interest in having an EIA carried out diligently, comprehensively and effectively in this highly sensitive and important site in the City of Bath that was inscribed as an exceptional World Heritage Site in 1987.

PERA's findings highlight significant general omissions and deficiencies throughout the submitted EIA Scoping Report and these are then clarified chapter by chapter. It is noteworthy that the submitted report has been compared unfavourably with a corresponding EIA document relating to the development of a stadium at Stamford Bridge in Chelsea, London, which is similarly a site within a city location having nearby residential properties, but not with the huge heritage significance of Bath.

From the perspective of wider Bath, one of the most obvious concerns noted by PERA and endorsed by FoBRA is the consistent underplaying of the value, susceptibility and sensitivity of various views, and our understanding is that, if the applicant's proposals on

this are accepted, it would have consequences for the weight that is then given to these views in the examination of the full planning application.

The major shortcomings are numerous but some of the highlights detailed in the PERA report are the complete absence of any detail about the uses other than rugby (even though the 680 space capacity car park use will effectively be 365 days a year as compared with 15 to 20 for rugby); the complete absence of any mention of the temporary facilities which have been much trailed; and the silence as to the pitch - which we understand is likely to be hybrid. The absence of such detail in the scoping report means that the EIA process would be practically meaningless and lack any proper framework. FoBRA's concern is that the EIA scoping report manifestly downplays the importance or susceptibility of certain views and receptors, not to mention the proposed use of the current temporary stands as the baseline for the EIA, rather than the 2015 stadium heights and capacity. The need for the use of appropriate methodology for assessment of air and water pollution and traffic impact must be required for the EIA

FoBRA supports Historic England's suggestion of erecting balloons/cranes in situ to demonstrate the impact of the building on sight lines etc. This would surely be extremely helpful in allowing all parties to make a proper assessment of impact on views.

In summary FoBRA supports PERA's concerns and believes that their comments are a valuable contribution that must be considered both by the applicant and the Local Authority. We consider the submitted EIA Scoping Report to be seriously deficient and needs to be revised thoroughly to ensure the EIA itself is appropriately designed and carried out. It should go without saying that if a scoping report is either drawn too narrowly, or has omissions or inaccuracies in detail, any subsequent EIA will in itself be flawed and will not be fit for the purpose intended.

Yours sincerely

Nicholas Tobin
Vice-Chairman
FoBRA