

DRAFT CORE STRATEGY
FoBRA Comments
Final – 27 Jan 11

Items raised with B&NES

MATTERS WE COULD SUPPORT

Para 1.26 (p19), 2.28 and Policy B1(1d) (Scale and location of growth)

FoBRA welcomes the priority for growth to be steered towards brownfield land and away from use of green spaces in Bath (ie towards preferential preservation of green spaces, particularly playing fields, in accordance with Planning Policy Guidance 17: “*Planning for open space, sport and recreation*”).

Para 1.27, Objective 3 (p16) and Strategic Issues (3) (p29) (Growth in Bath)

FoBRA is pleased that the existing in-commuting imbalance has been addressed but the document is weak on detail and an understanding of the need to raise economic prosperity on a per-resident basis, not simply to ‘grow the economy’. The Core Strategy is the ideal opportunity to establish ‘priority sectors’ for economic development. Examples could be:

- higher education as an economic sector in itself;
- technology/engineering-based employers of our local graduates;
- the arts as an economic sector in itself;
- perhaps a regional public/private medical centre of excellence;
- perhaps regional professional business services;
- tourism (of course), and
- retailing (of course).]

Policy B1(8) (p35)(Bath Spatial Strategy) and Policy B2(4) (p40)(Central Area Strategic Policy)

FoBRA supports "a new cultural/performance/arts venue within the Central Area". However, if we are looking to expand the creative arts and software industries in the city then a substantial conference centre with associated accommodation would be an excellent additional magnet, as the international reputation of Bath makes it potentially a highly desirable conference venue, and conference delegates would provide valuable high-end business to the local hotel, restaurant and entertainment industries even at relatively unpopular times of the year. This part of the plan needs to be expanded and elaborated.

Policy B2 (p38)(Central area strategic policy)

FoBRA agrees with most of this, though some would see point 3f as provocative (Leisure Centre and Recreation Ground identified as “Key Development Opportunities”), but we should particularly welcome point 2m under the Placemaking Principles (“lived-in feel”). This does not happen just because people happen to live there. It is because they actively care for their premises and make an effort to resist undesirable changes nearby. Visitors like to see a place well maintained. Further, in para 2h there is a missed opportunity for the Council to have a comprehensive plan for the riverside in Bath. Coordinating a long term master plan for the riverside is a

role the Council is uniquely able to play. It needs Council commitment and priority in this document.

Solutions: (a) encourage city residents to maintain and invest in their properties, and (b) develop a comprehensive plan for the riverside in Bath.

Para 2.22 (p48)(MoD sites)

FoBRA welcomes early redevelopment of Foxhill and Warminster Road. However,

- The entry talks only about housing (850 homes). Although suitable for housing, could these sites not be used for high tech industry offices too (no noise, lots of computers, close links to City Centre, good travel links) thereby helping to reduce commuting?
- This is one of the few mentions of the important SHLAA, which indicates where housing might be able to be built in B&NES.

Solutions: (a) Change MoD sites to mixed development and (b) refer to the SHLAA wherever appropriate – for example Objective 5, Policy DW1, Table 3(5) and Policy B1(3).

Para 2.33 (p53)(WHS Architecture styles)

FoBRA supports this wording on architecture styles, though there is a delicate balance to be struck to avoid sins evident in (for example) central Birmingham and Bristol. Most important is to get the scale right – height and massing. Exact but modern copies can be the right approach to infill existing set-pieces.

Para 2.44 (p56)(Transportation)

Good, but commitment to addressing Bath's transport and congestion problem needs strengthening. This should be a fundamental priority as it profoundly impacts residents' quality of life, economic development, conservation, and the environment. As FoBRA policy states, this needs to be radical, comprehensive and urgent. The prevailing priority of the car over public transport, pedestrians and cyclists needs explicitly to be removed before anything can change.

Policy CP9 (p123)(Affordable housing)

The only difference between 'affordable housing' and other housing is a public rental subsidy, which can be applied to any housing and not only to that delivered in new developments. Planning gain can be extracted from developers in other forms and used generally for social housing subsidy. The reality is that Bath, as a preferred place to live, will always attract people who do not depend upon local employment, keeping house prices high in relation to local employment earnings. Adding to the housing supply will only marginally affect this imbalance. The emphasis should be on a long term higher value economic mix (as planned in the Core Strategy) and on promoting a cultural acceptance of house renting rather than ownership (Bath rental costs are much more cost effective and in line with local employment incomes than is home ownership).

Policy CP12 (p128)(Centres and retailing), also Paras 2.23, 6.89 and Table 4

FoBRA supports this policy, though it is entirely reactive, and should be made sharper:

- Para 6.89 is correct that some centres hardly cater for everyday (eg Lansdown Road).
- In many cases, shops have been replaced by take-aways, either licensed or unlicensed, which arguably create vitality, but can become a focus for antisocial behaviour in the evening, and yet such a change of use would be consistent with the policy.
- Local centres have declined because people shop elsewhere (in the London Road one would inevitably shop in Morrisons).
- The 'use them or lose them' principle also applies to pubs, which don't seem to be covered by the Core Strategy.
- Once the Rossiter Road scheme is implemented in Widcombe, vacant premises are expected quickly to be let and rental levels to rise due to increased demand

Secondly, although concerns in this area are real, they are not easily addressed by the town and country planning system, since changes between various kinds of retail outlet are not "material changes of use" and this problem is exacerbated by the Town and Country Planning Use Classes Order. However, B&NES might instead use its landlord powers in Bath city centre, where it has a controlling interest in a high proportion of the stores, to encourage the spread and retention of specialist shops, particularly of high-value and luxury goods, thus reinforcing the magic which attracts shoppers.

Core Policies 6f (p129)(Well connected)

FoBRA supports this policy, and particularly welcomes the following:

Para 6.94 (Transport and Movement): the Council recognises the need for a study to assess an A46/A36 link and it points out the problem of excessive traffic in Bath though this should also be carried through to a commitment to do something about it via a master plan

MATTERS WHICH ARE NOT LEGALLY COMPLIANT

Policy CP4 (p110)(District heating)

FoBRA believes it is neither legal nor sound to proceed with this policy at present. There has been no consultation or discussion on this issue, and the breezy comment about mitigating any negative impacts on vaults in central Bath in para 6.24 is quite inadequate.

Solution: Promote discussion and hold consultation on this issue.

MATTERS WHICH ARE NOT SOUND

Para 1.07 (p9)(Transport Links)

This presents a misleadingly positive picture. Most of B&NES is not well served from the M4/M5 or from Bristol airport. The rail link to London from Bath is good, but very

expensive, thereby discouraging modal shift, and does not conveniently link to the rest of the country. Bristol airport may be rapidly expanding for passengers but carries almost no freight, which has relevance to the region's economic growth ambitions.

Solution: Soundness would be improved if there were better and more competitive transport links, eg (a) a direct bus link between Bath and the airport (which could run right through the length of the district) and (b) a rail link between Bath and a shuttle head for the airport in the Backwell area, which would avoid rush hour traffic congestion for the many who use the airport at peak hours. A study for such routes could be added to para 6.94.

Objective 2 (p15)(Heritage) and Para 2.44 (p56)(Transportation)

None of the 'Key strategies and plans' cited here include plans actually to reduce existing traffic volumes. A master plan for traffic in Bath is required. While the Public Realm and Movement Programme (PRMP) does include measures to reduce traffic in the commercial centre of Bath, it does not cover the bulk of Georgian Bath.

Solutions: (a) Task the Transport Commission for Bath to negotiate a Master Plan for Traffic, including measures to reduce its volume, and (b) extend the PRMP to the whole of the central area between the Holburne Museum and Royal Crescent.

Strategic issues (10) – Congestion (p29)

This should be strengthened to reflect the need for a Master Plan to tackle congestion and pollution in Bath. Alternative wording might be: "Bath suffers from high levels of congestion and air pollution throughout the main road network, including such iconic spaces as Queen Square and The Circus. A traffic Master Plan is required to address the problem. The spatial strategy should make the most of existing public transport infrastructure and planned investment so as to enable people to travel to and around the city with less environmental impact and greater efficiency". (See comment on Objective 2 above.)

Policy B1 (p34)(Bath spatial strategy)

Section 8 should include leisure, and the provision of a new Leisure Centre (whether or not a new rugby stadium goes ahead).

Para 2.16 and Diagram 7 (p37)(The Central Area)

It appears that the central area has been extended north as far as Alfred Street (from a present limit of George Street?) and East as far as Johnstone Street (from a present limit of Pulteney Bridge?). This might have the benefit of preventing the conversion of retail premises to pubs and bars. However, the document's vision for 2026 (diagram 8, p42) shows the Central Area expanding to include (for example) the whole of the Rec. More information is needed on the implications of this, because, if rezoned from residential/green-open-space to city centre/commercial in terms of planning and licensing of any new buildings along the river, residents could thereby lose rights to question these developments.

Solution: More information required.

Policy B2(4h) (p40) (Central Area)

Note that a new stadium is to be accommodated in the central area (para 3f). While it might be possible to justify extension of the central area to include a new rugby stadium and related facilities on the Rec, this should not be allowed to mean that the Rec is generally 'open' for development.

Solution: make clear that any development of a new rugby stadium and related facilities on the Rec would be a 'one-off', because the club is already there, and that there is no intention to apply the land-swap concept to other developments.

Para 2.26 (p49)(RUH)

On-site development must be a good thing, but it should be made sustainable from the transport and parking points of view.

Solution: lay down requirements for public transport, and discourage staff and visitors from parking in nearby streets.

Para 2.32-2.35 (p53)(WHS Setting and Building heights strategy)

Mention of the recently endorsed WHS Management Plan is strangely absent, as is the funding of it. Commitment to preserving, enhancing, celebrating and exploiting Bath's WHS status is weak, and conflicts with major developments (e.g. Western Riverside building heights) are not addressed, nor ensuring excellence in contemporary architecture (e.g. Western Riverside block design) or using WHS as part of the economic development plan. Further, FoBRA took part in the committee to draft the Building heights strategy and hence welcomes it, but the SPD should be framed now, and the Strategy should also apply to Bath Western Riverside.

Solution: Strengthen commitment to and financing of the WHS, and frame the WHS SPD now (para 2.35).

Policy B.5 (p54)(Strategic policy for Bath's universities)

This entry has been provided by Chris Beezley of the Beech Avenue Association:

The Core Strategy Paper (para.2.38) refers to Information Paper 3 which states (at para.4.3) that current student numbers at Bath's two Universities account for the demand for approximately 2,150 Houses in Multiple Occupation (HMOs) across the city, i.e. in excess of university-managed accommodation on-campus and elsewhere. This represents one HMO for every 19 residential properties across the entire city (para.4.3).

Further, at para 2.1, the Information Paper states that the historical average annual growth rate in student numbers at the University of Bath has been 4.82% over the past 15 years. Table 3, however, shows the total University of Bath student population to have increased by 5.9% (from 12,970 to 13,738) between 2008/9 and 2009/10 (the latest actual figures available). Para.2.10 of the Information Paper states that the emerging Masterplan for the University of Bath campus assumes a future student growth rate of up to 3% per annum.

The Information Paper goes on to argue (para.2.12) that only if the future average increase in student numbers at The University of Bath reduces to 2% per annum, and the University builds 2,358 new campus study bedrooms by 2020, will the

existing demand for HMOs from University of Bath students (1,196 from Table 3) be likely to remain at current levels.

Para.2.13 of the Information Paper claims that calculations are presented at Appendix X to show the effects of a 3% and a 1% p.a. increase in University of Bath student numbers. These calculations cannot be found. However, my own calculations show that these two scenarios would result in a demand for approximately 300 more and 200 less HMOs respectively, relative to the 2008/9 level (Table 3). Hence it can be seen that the potential demand for HMOs is highly sensitive to small percentage changes in the student growth rate.

Para.4.8 of the Information Paper shows the effect on demand for HMOs of three scenarios for future student growth. These assume zero growth at Bath Spa University combined with zero, 1% and 2% growth at the University of Bath respectively. No figures are provided for a scenario with the University of Bath expanding at 3% per annum - which would be consistent with its draft Masterplan and significantly less than historical levels. Such a scenario would result in the need for 125 more HMOs than the current estimated total number of 2,150, even allowing for a reduction in demand of 175 from Bath Spa University students.

The estimates provided in Information Paper 3 and hence the draft Core Strategy Paper itself assume that the University of Bath will build 2,358 additional campus bedrooms by 2020/21 at a rate of approximately 240 per annum starting next year (2011/12). Yet no mechanism appears to be in place to link future student numbers to any actual building programme. Table 3 shows the number of University of Bath campus bedrooms to have remained static over the last three years while student numbers have increased by approximately 1,000. If this state of affairs is allowed to continue the Core Strategy aspiration that the 2010 level of HMOs (approximately 2,150 from para.4.3) "will represent the high watermark within the city" will be seriously at risk.

What needs to be done

1. Core Strategy Policy B5 (Strategic Policy for Bath's Universities) should include a control mechanism to limit student recruitment to that which is sustainable taking account of the actual quantity of University-managed student bedrooms available at that time combined with a defined acceptable level of HMOs. The Core Strategy Paper should define clearly what that level is. Universities' aspirations to provide large numbers of student bedrooms in future years should not be relied on.
2. The table at para.4.8 of Information Paper 3 should include the scenario in which there is zero growth in student numbers at Bath Spa University and 3% p.a. growth at The University of Bath, in line with the Universities' Masterplans.

Para 2.48 (p56)(Flood storage area)

The quoted figure (345,000 m³) is equivalent to a staggering 96 football pitches or 3 Royal Victoria Parks at an average water depth of 0.5 m, and correspondingly more if the water was shallower.

Solution: Refuse permission for any development until matching storage area is identified and made ready for use.

Policy CP 13 (p132)(Infrastructure provision)

There is a glaring omission here, and indeed in the Core Strategy generally, that transport matters are delegated sideways to the JLTP3.

Solution. Major developments should only be permitted in conjunction with suitable public transport infrastructure.