

DRAFT FOBRA COMMENTS ON THE LOCAL PLAN RESET (Final)

In April 2024 FOBRA responded to the first Local Plan Options document. The response can be summarised as follows:

1. Lack of strategic transport input to development of a strategy,
2. Green Belt – it was not clear what the assumptions were that led to proposals for land release.
3. There was a lack of quantification of what the capacity of the City might be, thus of how much more development it can absorb,
4. There was no indication of how the demand for housing might be allocated for each of the options.

FOBRA also commented on the length and complexity of the report and the fact that much of the key information, needed to understand the strategic options, was buried in historical documents, some of which were not available on the website.

FoBRA represents over thirty Resident Associations within the city of Bath who meet at full committee quarterly to discuss major developments within the city. Given that Bath has no Parish status we suggest that Bath is particularly vulnerable given the democratic deficit this causes. We would hope that the Local Authority regard FoBRA's comments alongside other statutory Consultees from Parishes outside the city boundary.

COMMENTS ON THE NEW RESET DOCUMENT

Strategy and Transport

We welcome the clear identification of strategic options for the distribution of growth within Bath and North East Somerset, and we are pleased to find that the need for a coordinated approach to development and transport is recognised. Clearly, concentrating new development along the principal transport corridors would enable the additional travel demand to be accommodated within the terms of the Council's objectives on Active Travel. However, all settlements within the District will have a housing need arising from the existing communities, and that needs to be recognised irrespective of how they are located in relation to the principal areas of growth.

We have some concerns that the diagrams showing the strategic options are not backed up by any guide on the levels of development being implied in each of the growth areas identified i.e. how the additional 27,000 dwellings are assumed to be distributed in each of the options. It is difficult for anyone to comment on the likely impacts of these development areas in the absence of a clear understanding of scale.

We have noted the transport analyses that are planned for each of the strategic options, both at the macro and the local level. Consultees are being asked to make judgements between the strategic options without the benefit of proper understanding of transport impacts and the consequences for the transport systems. The impact on Bath's road networks is of particular relevance from FoBRA's perspective. Major developments on the periphery and in areas further away but with connections to Bath, are going to be the origins of additional trips into Bath on networks that are already highly constrained. Some indication of these impacts would be helpful in making comparisons between the options.

The transport network diagrams (*Approach to Transport*) indicate multi-use of the strategic routes into and out of the City with sections of these routes re-assigned in the quest to promote Active Travel. It has yet to be demonstrated how these highly restricted routes will be able to cope with the demands being made upon them. FOBRA is not opposing the aims of the Council in seeking to promote Active Travel, but we are seeking assurances that these aims are practicable, especially with the prospect of additional amounts of development both within and out of the City. The Council emphasises that it is required to take a Vision-led approach. This does not come across in these documents. We suggest that a much clearer and ambitious view of the future transport systems serving the principal urban areas including Bath would provide the basis for a more credible strategy for growth. But alongside this strategy robust modelling is required to ensure that existing residential

areas within the city boundary are not vulnerable to displaced traffic movements from new active travel routes.

Capacity

Comment is made in the Reset document on the constrained capacity of the City. The fact that the City will have a finite capacity is acknowledged but it is still unclear what the additional capacity might be beyond existing development commitments. This, of course, will be related to the sites available for development, but also to the massing and density of the development. Some of the recent residential development in the City, it could be argued, has excessive mass and is overly concentrated. It transgresses the criterion for the World Heritage designation in that it blocks views from the City to the rural periphery. Much of this development also lacks the open space close to it that is a characteristic of this City. There is a danger that cramming new poorly constructed development onto the remaining sites in order to achieve housing targets damages the fabric of the City and thus threatens its World Heritage status.

Cllr. Guy's letter dated September 2024 to the RT Hon Angela Rayner (at the time Secretary of State for Housing, Communities and Local Government), gives some quantification for Bath, but it is not clear what the implication is for development beyond existing commitments. Figures given in the document Need for Housing show the distribution throughout the District of existing commitments including 4444 dwellings in Bath. It also provides an estimate across the District of the requirement for new allocations including students of 19,900 dwellings over the period of the plan, but we can find no indication of how these might be distributed in each of the Strategic Options.

The document Draft Housing and Economic Land Availability (HELAA) 21st May 2025 raises some concern, and also some uncertainty. It identifies sites within or immediately adjacent to the City which have potential for development. We have done a rough count (hindered by the fact that there seems to be some duplication). From that document, by our reckoning, potential sites are identified with a capacity for between 17,000 and 18,000 dwellings. However, if all the sites that are, in part or in whole, within the Green Belt are removed, the capacity reduces to around 3200 dwellings, and many of the sites for these dwellings are constrained by other designations. This seems to confirm that the capacity of the City is highly constrained beyond the completion of the sites already committed, assuming that Green Belt land is not released. We believe that the analysis of the HELAA study could have been used, for example, to clarify the potential additional capacity excluding land in the Green Belt (and possibly other designations). This would have illustrated the level of constraint on capacity and given a logical basis for allocating the anticipated growth to the areas identified outside Bath in each of the Strategic Options.

With regard to the University assessments, student numbers need to be better modelled to link with the longer period of the Local Plan. This requires more work with the two universities and the council. This consultation suggests growth of 7300 (a third of total growth) in the next 20 years but this is far from certain and also may not be sustainable. Bath already has one of the highest proportions of student population. We need quality more than increased quantity which in turn will enhance the role the universities can play in the development of the City.

Green Belt and the World Heritage site

The City of Bath is tightly constrained by the Green Belt designation and by the Area of Outstanding Natural Beauty. These designations both support one of the principal characteristics of the World Heritage Site, the green setting of the City. The 2017 Baner study of the Green Belt around Bath is superseded by the study in 2022 by Land Use Consultants on behalf of WECA. This further study confirms the status of the Green Belt all around Bath as being of significance. It should be noted also that the Council has compromised the integrity of the Green Belt around Bath on a number of occasions in recent years by allowing development on the periphery of the City in a way that causes harm. From this latest appraisal of the Green Belt, it is unclear why areas of Green Belt land are being identified as potential development sites in the HELAA study. How can this be justified, given the high ratings of significance assigned in the analysis by Land Use Consultants?

Three large potential releases of Green Belt land are identified along with multiple smaller areas. The large potential areas for development are identified on the periphery of Bath adjacent to Newton St Loe, in the vicinity of Haycombe and in the vicinity of Weston. All three areas are in the Green Belt and all three are rated as significant in terms of the purposes of the Green Belt including checking unrestricted sprawl of the City, contribution to safeguarding the countryside, and, most significantly, preserving the setting and special characteristics of the historic town. There is concern that development on any of these sites, in particular, will be contrary to the aims of the Green Belt designation and will cause significant harm to the setting of the World Heritage Site. This has particular significance to the City of Bath which requires special consideration of the relationship between the City and the green setting, the WHS Listings imposing a stronger presumption against Green Belt release and requiring a much higher threshold of evidence to justify any release.

We would question sites identified in the HELAA study as having potential for development. The first one is the Sulis site on Claverton Down Road currently used as playing fields supported by a low-rise building. This use is compatible with its Green Belt Designation and the protection of the important Bath Skyline. The suggestion that it could be repurposed to provide student accommodation is not compatible with its role in preserving the open Bath Skyline in this location. The other site is Lyncombe Hill Fields, not in the green belt, but in recent years transformed from an agricultural field to an area for nature conservation as well as open accessible space in the heart of the city. Designation as a local nature reserve is being sought. Although in the HELAA study it is stated that it is unlikely to be available for development within the Local Plan period, it is important to cement its future as public open space beyond the end of the plan period. This principle applies equally to much of the other land identified in the study as being potentially available for development. A number of other very significant sites within the WHS green setting, green belt and ANOB which are identified as potentially suitable and potentially available in the HELAA. On the eastern side of the City this includes some sites partially owned by the National Trust such as Bathwick Meadows, areas in North Road and adjacent to Sham Caste, to the north of the city Primrose Woods and Charlcombe are equally sensitive sites which have various covenants and protected community space designations. These would be highly contentious sites for development and would have significant impact on local residential amenity and on the universal values of the WHS.

The City of Bath has absorbed significant developments in the last 15 years at the three ex M.O.D sites and along Western Riverside at significant density. FoBRA is concerned about the release of Green Belt or other land that could harm the setting of Bath and all of these sites are critically important to the setting of the World Heritage Site. We object to harm to the World Heritage setting that their development would cause. It is of great concern that so much of the Green Belt has been included in this analysis. This demonstrates the need for further analysis of the HELAA study at this stage to demonstrate the restricted capacity within the city boundary.

SUMMARY

FOBRA supports the approach of developing options for the future development strategy for the Banes area. We believe that the options selected are reasonable. The analysis of the options in the Sustainability Appraisal is helpful, but drawing meaningful comparisons between the Options is hampered by a lack of key information, especially on the likely distribution of the anticipated growth. A key criterion in selecting a preferred strategy will be the more detailed and rigorous examination of transport strategy which we hope will be carried out in close cooperation with the land use studies.

FOBRA can see from the text of these reports, that some of the principles and approaches that FOBRA commented on in the earlier consultation have been recognised by the Council. Our concerns are that the sheer volume of the tasks required will hinder the chances of being able to study to the level of detail required. This is particularly so in Bath given its status as a conservation area with two World Heritage Site designations. We are concerned by the identification of potential and significant land releases on the periphery of the City, all of them within the Green Belt and all of them important to maintaining the integrity and protecting the openness and character of the Green Belt surrounding the city. We are also concerned by the absence of detailed analysis of the potential capacity of the City. This is determined not just by the availability of developable land, but by the need to provide open space and to maintain a high quality of urban design. We would have expected there to be a

clearer view, at this stage in the Plan's development, of the limitations in capacity. FOBRA is aware that there is growing concern from areas outside Bath that excess demand from a highly constrained Bath will result in greater land release in their areas and that there will be increasing pressure for land release around Bath. It is important that the random and piecemeal development nibbling away at the Green Belt around the City, that has been happening over the past 10 to 15 years, is resisted.

FOBRA commented on the previous Local Plan Options Report that it was lengthy and overly complex given the large number of documents that comprise the total Local Plan package. This has to be true of this stage of the process, too. There is no harm in having the support documents available, but we feel strongly that key information from the supporting documents should be summarised in the principal Local Plan Reset document. This document should provide a narrative that enables consultees to understand and be able to respond to the consultation without having to search through a multitude of additional reports.

FoBRA November 12th 2025