

## FoBRA Planning Report December 2022

The Planning Group have been concerned with two city wide issues since our last committee meeting. We submitted a response (sent out to all members 14<sup>th</sup> November) to the consultation relating to the new Local Plan approach. In addition we have continued to learn more about the gas works outline planning application on Western Riverside. On this matter there are two issues which Graham raised at previous committee meetings as being of concern to FoBRA in relation to the current local plan, lack of clarity on affordable housing provision and quality of public amenity space.

### 1. **FoBRA response to consultation: Approach to B&NES Local Plan 2023**

Key issues FoBRA would like to be considered as part of the Local Plan approach:

#### 1. **Be consistent with and “in line with” adopted Council policies**

- This is particularly relevant to ensure that new schemes consider impacts on both the development site and the wider neighbourhood context they sit within to ensure that such developments enhance rather than detract from existing neighbouring areas within Bath.
- Ensure that individual developments comply with current policy but not just within a site silo. This can be to the detriment of the immediate neighbourhood and create a situation for the pre-existing neighbourhood which is inconsistent with the Council’s own adopted policies. While the site allocation themselves may be in line with certain policies the adverse effects of that site on the wider locale should require scrutiny, and mitigation if required via an impact assessment of the site allocation on the existing neighbourhood.
- Ensure that planning and transport impacts are more closely considered and consistent with adopted policies, within the municipal boundary not only the small city centre core.

#### 2. **Be consistent with and “in line” with Bath’s World Heritage Management Plan**

- The Local Plan should protect the World Heritage site of Bath as a whole as advised in NPPF which states World Heritage status should be a key material consideration for planning applications.
- The city is recognised as a place of Outstanding Universal Value for architecture, town planning, landscape and archaeological remains
- The inscription covers the whole city, the boundary is the municipal boundary
- The wider landscape setting lies beyond the site boundary “(2.4) it offers effective protection as a “buffer zone”
- Ensure outstanding universal value of the World heritage site of Bath (architecture/town planning/landscape/archaeological remains is understood, protected and sustained (1.6 aims) should be one of the key objectives of the new Local Plan . Bath’s trees and landscapes are an integral part of the OUV and protection and replanting are critical for both bio diversity but also world heritage.
- Key sight lines are established as part of the OUV of Bath city these should be detailed
- These key site lines should be reinforced and protected in any emerging tall building strategy
- To ensure the OUV of emerging architecture and development a design code should be established for schemes within the municipal boundary

- Extend the historic/heritage core boundary to encompass and protect major conglomerations of heritage assets, many of which are cited in the UNESCO inscription

### 3. Address the statutory consultee deficit that Bath city residents experience.

- Consider that the City of Bath has no Neighbourhood plan which sits below the Local plan whereas the areas surrounding Bath have Parish Councils to ensure full impacts on their area are understood, conveyed and dealt with in the formation of the plan.
- Ensuring that a forum of democratically elected councillors from the city of Bath have the ability to scrutinise the plan on the basis of Bath city interests could be a way to address this.
- Engagement with a multitude of special interest groups , (some may even be self-appointed rather than elected) is not the best way to represent the residents who live in Bath.
- Parish Councils, (as the process is currently set out) will have a disproportionate quality and quantity of consultation vs. residents of Bath. Bath City needs to have equal quality and quantity of consultation.

## **2. Former Gasworks, Windsor Bridge Road, Twerton, Bath, Bath And North East Somerset,**

- **22/03224/EFUL** The demolition of existing buildings and decontamination/remediation of the site to facilitate redevelopment for a residential-led mixed-use development, comprising residential dwellings (Class C3 Use) and provision of Class E floorspace (Class E(b) and (f) Uses), together with associated infrastructure, landscaping, and car and cycle parking, engineering works (on site and to associated areas) and access and works to the existing river wall, infrastructure and gasholder voids.
- This application seeks permission for the scale, appearance and landscaping of residential mixed-use development to provide 616 new homes, 234 car parking spaces (residential and nursery/early years), 1,029 dedicated cycle parking spaces and 64 further cycling parking spaces on external stands; commercial areas including a nursery/early years facility and associated open space, a micro coffee counter and a commercial unit proposed for use as a food and beverage venue; and new public spaces in the form of a new public square and public balcony; and landscaping to provide a river park and private gardens.
- The site of proposed development is the old Gasworks site, located within the Bath World Heritage Site and the immediate indicative townscape setting of the conservation area. The site forms part of the allocated Bath Western Riverside site under Policy SB8 of the Core Strategy and Placemaking Plan. An outline application for the development of up to 2281 residential homes and apartments and up to 675 student bedrooms **was permitted in 2010** (see 06/01733/EOUT). The site was in use as the Bath Gasworks by the mid-19<sup>th</sup> century, although the company was first established in around 1818. The site was cleared of buildings associated with the Gasworks post-1975, and the final gasholder was demolished in 2016. Surviving built structures associated with the site's original industrial use are concentrated along Upper Bristol Road (Kelso House and Kelso Villa, both Grade II), as well as the two defunct gas pipe bridges to the north and west of the site, both of which are recognised as Non-Designated Heritage Assets (NDHAs).
- The townscape character of this area of Lower Bristol Road is varied, featuring a mix of historic and later 20<sup>th</sup> and 21<sup>st</sup> century development. The historic built form is predominantly low-rise

terraced housing of 2-3 storeys to the east and west of the site, including the Grade II 1-32 Victoria Buildings. This represents the redevelopment and regeneration of a significant brownfield site within the city for housing.

- The proposed development must comply with the Local plan, contribute towards Bath's high demand for affordable inner-city accommodation and help to meet local housing need. Development on this scale must be high quality, sustainable housing of mixed tenure that meets national space standards, and 'futureproofed' to meet changing use requirements and appropriate to sustain the value of the World Heritage City.

On two specific issues (raised by the group previously) we intend to write to the local Ward Councillors, Colin Blackburn and June Player (Westmoreland) to express concerns surrounding the plans as currently proposed.

### **1. Affordable Housing**

The affordable housing offer as part of this development has not yet been clarified within the application. Given the proposed scale of development and its location close to the city centre, we strongly recommend that affordable housing provision is maximised to address rising house prices in the area which are inaccessible to a significant proportion of local residents. The Council should require the development to contribute a minimum affordable housing percentage of 30% in line with Policy CP9 of the Core Strategy and Placemaking Plan.

We further emphasise that affordable housing should be provided in a mix of housing types and tenures to "contribute to the creation of mixed, balanced and inclusive communities" (Policy CP9). Delivery across the site should be tenure-blind both in terms of the types of housing provided, and also in terms of access to residential gardens/green space.

### **2. Public amenity Space**

We have further concerns regarding the lack of detail as to the public amenity and accessibility of green spaces and facilities as part of the development. Within the D&A Statement (Part 7), it is indicated that a large proportion of green space and associated "play elements" would be allocated as residential gardens and as such would not be publicly accessible, or accessible between buildings/residents unless otherwise specified. There remains a question as to the permeability of green space and the provision of "*adequate and usable private or communal amenity space and defensible space*" for all residents in accordance with Policy D6 of the Core Strategy and Placemaking Plan. This remains a priority when considering the as-yet unspecified allocation of affordable housing, as well as the provision of green space across the site.

It is vital to ensure that the provision of outdoor space, both public and private, is suitably balanced against the proposed density, massing, scale, and layout of built development to mitigate the potential for overdevelopment and ensure that green space allocation is proportional to housing density.

Planning Group 3/12/22