

Federation of Bath Residents' Associations (FoBRA) – Comments on the planning application for the Lidl at Lambridge sports ground on the London Road , 23/02212/FUL

July 15th 2023

OBJECTION

The Federation of Bath Residents' Associations is an apolitical organisation that is an umbrella representative voice for 34 resident associations (representing about 5,000 resident association members in the City of Bath) and six affiliate organisations that include the University of Bath and both universities' student unions. The residents of Bath are neither represented by a Town nor City Council nor Parish Councils, and thus FoBRA, inter alia, reflects a significant part of the community.

Local residents in Lambridge have recently applied for membership to FoBRA and object to the development on the basis of a variety of reasons: Damage to their local traders' businesses in Larkhall, traffic and congestion impacts on the London Road, displacement of more traffic onto roads in Camden and Larkhall, environmental risks to the sensitive river corridor where protected wildlife now reside in a "wildlife haven", risks to the heritage nature of their neighbourhood. Also they point to the fact that there is a Morrisons a few hundred metres from the proposed site (negating any rationale for another supermarket to be built so close).

FoBRA has discussed the proposed change of use of this field at full committee meeting and objects to the proposed development of this site. For clarification FoBRA supports appropriate and sustainable development on brown field sites within the city. Our objection relate specifically to this site NOT to Lidl opening new stores on other brownfield sites in Bath.

We are concerned by the erosion of the green ring surrounding Bath resulting in significant harm to the conservation area and World heritage city, the impact of development of this site on the river corridor given the lack of formal Environmental Impact Assessment and contamination survey or report prior to planning application. Finally the impact of more congestion on the London Road which already contends with substantial traffic volumes impacting on air quality.

Objection 1. Green field development in Bath, erosion of World Heritage setting

The green field site which is subject to this application sits within the conservation area at this most iconic of gateways. We therefore question the selection of a green field site whose very existence helps to make Bath a unique city in the UK and indeed in the world. The gateway to our UNESCO (doubly) inscribed city should exemplify the World heritage values which make the city of Bath so special. The London Road at Lambridge is an important and historic entrance to the city with a clear distinction between the green rural setting and the Georgian town planning.

Of the six Universal values which make up Bath's UNESCO inscription, this site exemplifies three of these universal values:

Georgian town planning

Georgian architecture

Green setting of the city in a hollow in the hills

The Local Plan SPD "Bath city wide character appraisal" identifies the importance of the entrance to the city, describing the character as a "grand gesture entering the city", "This area is an historic route into the city. For many visitors it was and still is the first impression of 18th Century Bath". Chipping away at the universal values which combine to make our city so rare and so special will damage our city irrevocably.

Thus the current green/agricultural landscape abutting the Georgian town planning makes this a rare and unique entrance to Bath, an iconic gateway to the city where Georgian development meets green fields and the rolling hills.

This green setting itself (as one of the UNESCO universal values) requires the same level of protection as the listed Georgian architecture it sits beside. It is the combination of the two which gives our city the unique World Heritage status.

We have precedent for protecting the green setting of our city, although currently used as a sports field it was originally used for agriculture as river meadow pasture and sits between two protected landscapes of Bathampton and Kensington meadows. All of these meadows require protection not development.

Objection 2. Lack of Environmental Impact Assessment prior to planning application

The field at Lambridge hosts a diverse large population of bats, hawks, kingfishers and, most recently, endangered European beavers. We have photo and video of beavers directly on the site, swimming past the site and feeding nearby. Of course there are also insects, bees and a wide variety of mature trees and plants. The field is part of the tree lined river corridor which is designated SNCI in the BNES' local plan, a key component of the District's green infrastructure providing benefits for "people, place and nature". The Local Plan Partial update 2023 states that it supports a rich diversity of wildlife, including nationally and internationally protected species for which protective legislation applies.

The environmental sensitivity of the site to a change of use of this nature should have been addressed in a formal Environmental impact assessment. We question why the pre screening did not require Lidl to submit a formal Environmental Impact Assessment?

Also, given the sensitivity and size, why has an independent contamination survey not been conducted prior to planning application registration under policy PCS5 which requires a proposal to not cause significant harm or risk to health or the environment from contaminants. It is not acceptable to leave an applicant to conduct their own contamination survey post planning; given the commercial pressures they would be under it is difficult to accept full and transparent disclosure or the concept that they will police/scrutinise themselves. Residents of Bath need to understand the implications for public health of any

disturbance of this site by developers and be given the chance to scrutinise consultants' reports as consultees as part of the planning process. A formal EIA process prior to planning application would have disclosed the level of contamination at this site and local people would be able to comment on this as part of the planning process.

Objection 3. Traffic impact on congestion and NO2 emissions at Lambridge

The last plausible data is 2019 due to pandemic and Cleveland Bridge works. That year the annual mean was 36 microgram/cubic meter which makes it borderline for needing to do extra work to show compliance.

It is current practice to require that when a local level is close to 40 modelling is required to show this won't be exceeded. Looking to understand how other significant developments in the city have to demonstrate compliance we have examined a recent scoping exercise conducted by the Council for development at the Recreation Ground. The consultation response from Environmental Monitoring in the EIA Scoping application for the Recreation Ground for example said *"As the Council has been directed by Government to meet 40 µg/m³ any development which causes concentrations to exceed this in Bath will be considered significant in terms of air quality. Due to model sensitivity, areas above 36 µg/m³ should be carefully considered and sensitivity tested."*

Consultees have been deprived of the opportunity to scrutinise the impact on air quality at this part of the London Road where there is a children's play park and where people live.