

Placemaking Plan - Main Modifications

FoBRA response to consultation

MM19 – 22 (Highways, Park & Ride Sites, Transport Requirements for Managing Development, Parking):

The overall effect of these changes appears to be to relax parking standards and so allow more parking provision. This is likely to generate increased traffic. In addition, the changes do not address FoBRA's key point at the Examination in Public (EiP) that parking standards fail to make any distinction between areas outside the very small City Centre Zone. Therefore, FoBRA again makes the point that, to comply with the Bath Transport Strategy, Parking Standards should be redefined. In particular:

- Parking Standards specific and appropriate to the Enterprise Area should be established, separately from the rest of the city outside the centre.
- Consideration should be given to the need to retain maximum parking standards for residential development within the Enterprise Area.
- Within the Enterprise Area, it may be appropriate to distinguish areas in the immediate vicinity of the city centre (eg the Bath Central Area as defined in the Core Strategy - see map attached) from more peripheral parts of the Enterprise Area.
- In setting Parking Standards, due regard should be paid to the aggregate parking provision in the area, its impact on traffic levels and the objectives of the Bath Transport Strategy.

Specific Points:

- MM19: para 582 FoBRA supports this, being the wording agreed at the EiP. It includes reference to A36-A46 traffic.
- MM20:
 - Para 622 – FoBRA supports this, as it sets P&R provision in the context of transport strategy.
 - Para 663 and 664 - No comment.
 - Para 625 - FoBRA supports this, as it introduces the idea of balancing the needs of the city against harm elsewhere. It also mentions impact on the Outstanding Universal Values of the WHS, as well as the Setting. The impact on the WHS is likely to be positive.
 - Policy ST6 - FoBRA supports this, as it deletes the 'no unacceptable impact' formulation and replaces it with a public benefit test.
- MM21: Policy ST7 - FoBRA opposes the newly introduced sub-paragraph, as it proposes flexibility to vary minimum or maximum parking standards. This could have a positive or negative effect.

- MM22:
 - Para 639 FoBRA opposes this, as it now provides for possibly increasing parking provision but with no reduction in standards. It therefore appears to provide an upwards ratchet in parking provision.
 - Para 642A As with para 639, FoBRA opposes this, as it, too, removes the requirement to assess offsite impacts and requires a parking assessment of new developments of 10 or more dwellings in the City Centre Zone - a significant relaxation.
 - Para 645 FoBRA opposes this, as the amendments have the effect of accepting that parking demand must be met rather than managed.
 - Para 655 Quite what this means is unclear. Clarification required.

MM24 – University Land:

- Para.17, p.4 Having long pressed B&NES to publish a Student Housing Strategy document capable of reacting to the changing aspirations of the Universities (declined again at Placemaking Plan (PMP) para 234), FoBRA welcomes the retention of the statement here that the development of the Universities requires strategic policy direction. As the Inspector suggests (para.23 - Interim Statement) ‘the Council re-consider its approach to the changing circumstances of the Universities deferring consideration of how their requirements should or should not be addressed to the forthcoming [Local Plan] review’, FoBRA proposes additional words as follows:
 - This strategic policy direction should take the form of a comprehensive and regularly-updated Student Housing Strategy document agreed between all stakeholders.
- Para.22, p.4 FoBRA welcomes retention of the important statement that the unmet conflicting demands for land use are not considered to represent the ‘exceptional circumstances’ needed to justify development in the Green Belt and that neither should they override the great weight to be afforded to the significance of the World Heritage Site. FoBRA notes that MM 24 prioritises the limited land available for housing, employment floorspace and growth in hotel demand at the expense of retail capacity. The growth aspirations of the Universities are unlikely to be realised under this approach (for example in terms of availability of sites for further Purpose Built Student Accommodation (PBSA) blocks), so it would be misleading to delete that as proposed here. The revised wording of this paragraph should be modified to read
 - ‘...and will accept that there is a shortfall in meeting the retail capacity and student accommodation requirements identified for the whole plan period’.

In view of the Inspector’s stated preference to defer consideration of student accommodation demand to a Local Plan review, just as MM 23 (para.9, p.3) proposes to add ‘It is the Council’s intention to review hotel requirements as part of the Local Plan review’, FoBRA suggests that the following should be added to para.22, p.4

- 'It is the Council's intention to review student accommodation requirements as part of the Local Plan review'.

MM26 – Land Use: Para.44, p.15

Again, FoBRA notes that MM 26 prioritises the limited land available for housing, employment floorspace and growth in hotel demand in full at the expense of retail capacity. The growth aspirations of the Universities are unlikely to be realised under this approach (for example in terms of availability of sites for further PBSA blocks), so it would be misleading to delete that as proposed here. The revised wording of this paragraph should be modified to read:

- '...and will accept that there is a shortfall in meeting the retail capacity and student accommodation requirements identified for the whole plan period'.

Once more, in view of the Inspector's stated preference to defer consideration of student accommodation demand to a Local Plan review, just as MM 23 (para.9, p.3) proposes to add 'It is the Council's intention to review hotel requirements as part of the Local Plan review', FoBRA suggests that the following should be added to para.44, p.15

- 'It is the Council's intention to review student accommodation requirements as part of the Local Plan review'.

MM31 - Universities:

The following arguments are expanded, with additional detail, in MM31 Supporting Document, attached.

FoBRA agrees with recognition in the draft PMP that student accommodation is one of the most high profile issues affecting Bath, and notes the Inspector's confirmation that the PMP will be examined for soundness against its purpose of giving effect to Core Strategy strategic policies. Thus, the PMP as proposed to be modified by MM31 can hardly pass such a soundness test when:

- Core Strategy strategic policy on controlling student accommodation is minimal and inadequate;
- There is no restriction on recruitment at Bath's universities;
- Bath's universities are under no obligation to provide additional student accommodation on or off campus;
- MM31 proposes to reinstate a previously-deleted and outdated saved Local Plan Policy which simply sets an arbitrary upper limit on University of Bath (UoB) campus bedroom numbers, with no compulsion on UoB to provide them.
- The UoB has signalled its intention to house minimal numbers of additional students on campus (much of which is protected by AONB status), preferring instead to expand non-residential floorspace;
- Control of off-campus student accommodation (HMOs and PSABs) is ineffective in much of the city;
- B&NES proposes to defer corrective action until an unprogrammed Core Strategy review or a new Local Plan, instead reverting to policy that is 10 years out of date and inconsistent with the Core Strategy;

- B&NES consistently refuses to acknowledge the urgent need for a comprehensive Student Housing Strategy.

FoBRA suggests that, contrary to the wording proposed in MM31, and in the absence of the analysis previously included in the draft version, the PMP should state that:

- The universities should take lead responsibility in planning for the housing of their students and plan for growth only in line with available accommodation, while the Council plans strategically for the residential amenity of all its residents in balanced communities.

MM32 - Universities:

- Paras.267/267A, p.122:
 - FoBRA welcomes the proposed changes which would then recognise that all undeveloped areas of the Claverton Down campus within the Cotswolds Area of Outstanding Natural Beauty (AONB) (not just north of The Avenue, as previously proposed) be treated as a 'special case' requiring a detailed assessment. Thus, as specified for the EiP, FoBRA considers that paras.267/267A should be expanded to explain how National Policy requires alternative solutions before considering major development within AONBs - which enjoy the 'highest protection' in relation to conserving their characteristics. FoBRA proposes the addition of the following wording:
 - *“Great weight should be given to conserving landscape and scenic beauty in AONBs, which have the highest protection in relation to landscape and scenic beauty”. (NPPF, para.115)*
 - *“Consideration of planning applications for major development within AONBs should include an assessment of the scope for developing elsewhere, or meeting the need in some other way”. (NPPF, para.116)*
 - FoBRA contends that, if the amount of development set out in Policy B5 of the 2007 B&NES Local Plan (about 2,000 study bedrooms and 45,000 sq.m. of academic space expressed within an obsolete campus Masterplan - as proposed to be included in MM31) 'is not necessarily a cap on the quantum of development that could be achieved on campus', then what is the point of including such outdated data? If it is decided to retain the 2007 wording, FoBRA calls for a statement of how many of these study bedrooms and how much of this academic space has been built over the last 10 years so that a recognisable 2017 baseline can be established.
 - FoBRA has argued elsewhere (in its response to MM31) that, without such a clearly defined baseline, such numbers are meaningless, and suggests that the proposed additional para.267A (which FoBRA supports in principle) is amended to use as its baseline, beyond which the proposed additional safeguards would be required, the completion of the projects included in the extant campus

Masterplan¹. This document includes, for example, how at least 1,700 more campus bedspaces² beyond those built to date could be accommodated without violating the outer sensitive Cotswolds AONB area.

- Policy SB19, p.119 (more correctly, p.127)
 - For the reasons given above, FoBRA strongly suggests the following important addition to the three bullet points proposed within the section headed '2. Purple Zones (hatched)':
 - *“includes an assessment of the scope for developing outside the AONB or meeting the need in some other way, as required by para.116 of the National Planning Policy Framework”.*
 - FoBRA also suggests an accompanying amendment to the paragraph immediately following these bullet points as follows:
 - *Replace “Cotswold AONB Management Plan” with “Cotswolds AONB Management Plan and paras.115 & 116 of the National Planning Policy Framework (NPPF)”.*

Final – 11th Feb 17

¹ University of Bath Masterplan 2009-2026, 2014 Summary Update

² i.e. 2,400 less The Quads (700)