

Planning Report for FoBRA Committee Meeting 23 February 2017

Regeneration of Foxhill Estate (16/05219/EOUT)

On 30 November 2016, the Vice-Chairman, on behalf of FoBRA, submitted an objection to an outline planning application for the regeneration and redevelopment of the Foxhill Estate by CURO on the grounds that it was over ambitious and would be socially destabilising. Of the 863 homes that currently make up the estate, CURO propose to demolish 542 homes and build 700 new properties, but only replacing 65% of the affordable and social homes there, in contravention of emerging Policy H8 of the Council's Placemaking Plan. Of the properties proposed for demolition, 20% (95) are owner-occupied and, according to chartered surveyors who are very familiar with the site, the majority of the homes earmarked for demolition are in good material condition. Moreover, it was pointed out that the application to build 700 homes on a 11 hectare site compared unfavourably in housing density terms with the developer's plans to build 700 homes on the adjacent 29 hectare Mulberry Park site.

In a 3½ page written response to the Chairman's letter to the Bath Chronicle (published on 22 December 2016) requesting CURO "*...to listen to Bath's residents and have the courage to go back to the drawing board [with your plans for the Foxhill Estate]*", the Chief Executive, Victor Da Cunha, disagreed with many of the claims/objections FoBRA had made and *inter alia* stressed that of the 144 comments/objections recorded, only 39 households had addresses within the proposed regeneration area, thus concluding that 90% of those directly affected had chosen not to object. At the FoBRA reception on 17 January and on this particular point, the Vice-Chairman reminded Mr da Cunha that in September 2016, a petition of 388 names objecting to the plans had been submitted to CURO.

Not only have FoBRA, the Foxhill Residents' Association, the Ward Councillor and many others objected but, additionally, several B&NES departments, including the Housing and the Planning Policy Departments (a) do not accept CURO's argument that the combined Affordable Housing (AH) delivery on Mulberry Park and Foxhill equal the current level of provision of AH, and that therefore all is well and (b) ask why the proposed regeneration benefits cannot be met by less drastic redevelopment or indeed softer revenue-based regeneration initiatives coupled with refurbishment or remodelling of the problematic flats/areas of housing stock. However, the key issue from FoBRA's and B&NES's planning policy perspective is the overall loss of AH (241 social homes) which is contrary to the emerging Placemaking Plan Policy H8. (This emerging policy has not been challenged by the Inspector). Clearly this needs to be balanced against the regeneration benefits that the scheme provides, but this evidence or justification has not yet been provided.

Redevelopment of the Pickford's Site (16/05504/OUT)

On 22 December 2016 FoBRA submitted its objection to the application to redevelop this site not only because of the questionable bulk, height, unappealing architectural aesthetics and loss of a most useful amenity for the residents and businesses in the centre of Bath, but principally because it represented yet another application for Purpose Built Student Accommodation (PBSA). More recently, B&NES Economic Development & Regeneration and Planning Policy departments have focussed their objections on the projected losses of industrial floorspace in Bath, including the Bath Press, Herman Miller and Roseberry Place sites. Given the economic and policy context and to show the lack of any "strong economic reason" under PMP objecting to the loss, the applicant was asked at pre-application stage but has not provided evidence of how the loss of current facility can be managed within the scope of Core Strategy and what efforts have been made to relocate the Pickfords facility and associated employment locally.

FoBRA's objections have additionally been endorsed by both the Bath Preservation Trust (BPT) and Bath Heritage Watchdog. The former considers that this site would be a prime location for residential accommodation, preferably low cost and aimed at young professionals and key workers and questions the need for further dedicated student accommodation in a key city centre site, especially given the urgent requirement for further city centre housing supply in Bath to support projected regeneration employment growth. They also noted (as did FoBRA) that many of the new student bed spaces that are being or have been built in Bath recently are actually not relieving student HMO housing pressures in the suburbs due to the fact that that they are prohibitively expensive to the normal student and therefore only cater for postgraduate or foreign students who can afford the high rental charges. The latter believe in reality that this should really not progress further than the outline stage as apart from the unanswered question over what is to happen to the current business and its staff, the single use of the site and the preference for students over employment or housing needs to be addressed.

Bath Quays South Development Site, Riverside Business Park, Westmoreland (16/04818/ERE03 & 16/04819/REG13)

The Bath Preservation Trust, Bath Heritage Watchdog, Historic England, Save Britain's Heritage and even B&NES's Planning Policy, Conservation, Urban Design and Landscape Officers have expressed their concerns but most have also objected to the amended plans to regenerate this site, not only because of its excessive height, bulk and massing which they believe would have an overbearing impact on the Newark Works listed building, neither preserving nor enhancing the setting of the nearby Conservation Area but, importantly, it would have a harmful impact on views within the World Heritage Site and its setting. Most concerning, though, the objectors argue that the plans fail to respect the special qualities of the World Heritage Site and, if the application causes the WHS designation to be put in danger, as suggested by Historic England in particular, this fact alone could cause more long-term economic harm to Bath than losing this particular commercial tenant for whom the application has been specifically designed.

West of England Joint Spatial Plan

FoBRA's answers to the questions posed in the latest consultation questions posed in the emerging spatial strategic policy document were submitted to the planners in December 2016. These covered *inter alia*: whether the strategy made adequate provision to address housing needs; could the delivery of homes, particularly affordable homes, be increased; did it [the strategy] make adequate provision to meet the region's economic needs; did the proposed locations identified meet the plan's strategic vision; and, were there any reasons why the strategy or identified locations could not be delivered? (see FoBRA website for submitted answers to the WoE JSP questionnaire).