

FOBRA RESPONSE TO THE LOCAL PLAN OPTIONS REPORT 2022 – 2042

This response is from the Federation of Bath Residents (FoBRA) which represents 34 Residents' Associations across Bath. In our response to the Options Report we have concentrated on City-wide issues. We have urged individual member Associations to respond on aspects of the Options Plan that are specific to their areas.

B&NES Approach and Strategy

We see the main issues with the Council's approach to developing a strategy as being:

1. The lack of any strategic transport input to the development of a strategy.
2. The argument for impact on the Green Belt is not developed. It is not clear what the assumptions were that led to the proposals for land release.
3. The lack of consideration of what the capacity of the City might be. How much development can Bath absorb without damaging the quality of its environment and status?

Comments on the document as it stands are limited by the lack of information within the report and by the unavailability of other relevant documents. In particular the Topic Paper on Infrastructure and other papers that were not available when the main document was released.

Quantification of demand for all the options, and an assessment of the ability (or not) of the City of Bath to absorb further development without harm to the WHS setting is important. Has the Council considered the impacts of the proposed areas for land release under varying forecasts of growth? Has the Council considered demand from outside Banes, specifically from Bristol?

Of particular concern is the apparent lack of any assessment of impact on the transport system, the development of that system to support growth and which should help in the selection of the areas for development.

One can see how people might be able to respond on proposals for individual sites, but it is difficult to understand how to comment on the more strategic issues. The length and complexity of the report with much of the information contained within other historic documents adds to the problems of making informed comment.

The substance of our Response is set out in the following pages, the contents of which we have submitted across a number of different Webforms on the consultation website, in some cases unavoidably duplicated in two or more Webforms to which they appeared relevant.

Federation of Bath Residents' Associations

16 April 2024

STRATEGIC OVERVIEW

References: DISTRICT WIDE STRATEGY AND LOCATION OPTIONS

BATH AREA OVERVIEW SECTION 5

TOPIC PAPER – STRATEGIC DEVELOPMENT LOCATION OPTIONS

This is a difficult set of reports to read given the statutory nature of the document. There is a logic in the development of a strategy for the District including Bath City, but there are flaws; partly by omission and partly by the evidence, wholly or in part, being available in other documents. Some of the key documents are referred to but were not available at the time of our review..

The strategic options that are being tested are:

1. A strategy based on a high reliance on Green Belt release,
2. A strategy based on a low reliance on Green Belt release,

There are two sub-options:

3. A strategy based on a higher level of growth with significant Green Belt release,
4. A strategy based on low growth with no Green Belt release.

It is difficult to find quantification of demand which relates to the options 1 and 2 and sub-options 3 and 4 and a summary of anticipated levels of growth should be included in the document.

It is therefore difficult to determine the figures being used for the demands for land for housing and for employment uses. For Bath, the figures for office and research floor space (2022-2024) are given in the Options document. For housing we would like to see an overall figure of new housing land required for the District (in addition to sites allocated in the previous local plan but remaining undeveloped in 2022). The analysis on housing demand is in the Topic Paper on Housing Need and Supply and Policies Approach, January 2024. What is also missing is projection of the gross housing need in Bath City for the plan period (it is dealt with on a District-wide basis), and an assessment of the potential capacity for housing on new sites within the City in addition to currently allocated but undeveloped sites.

The assessment of capacity should take into account not just the potential availability of sites, but constraints such as density, impact on the setting of the City (ie. the WHS designations), the ability of the City to absorb additional development taking into account both transport and other infrastructure constraints including environmental criteria and capacity of social infrastructure. It should be noted that there is a Topic Paper on Infrastructure, but it was available when the main document was published. We suspect this will be related to social infrastructure (schools, health and social care etc.) but not to transport infrastructure.

There is an assumption that land outside the existing settlements will be required for development during the plan period, requiring land releases from the Green Belt. The areas shown close to Bath are between Newton St Loe and the Globe public house, and an area in the vicinity of Burnett, close to A39. As neither of these seems to be favoured, certainly in the short term, we question the need to identify them in the Options Report. Similarly there is mention of land in the Newbridge area including the Park and Ride site, it appears to be ruled out as its development being likely to harm the setting of the World Heritage Site.

TRANSPORT

References: INTRODUCTION TO SPATIAL STRATEGY PARAS. 4.5 TO 4.6

TOPIC PAPER ON BATH PARAS. 2.3 AND 2.6

There is frequent reference to the Active Travel Strategy, but little consideration of how an overall transport strategy (accepting the need for non-Active Travel component of travel demand) might evolve. We would argue that transport strategy should be integral to any strategy for growth. It should be a component alongside the identification of land use options as well as addressing current short comings in the transport system. In the urban area the transport system should be developed within the constraints of environmental criteria (air quality, noise and visual impact of both vehicles and road signage) addressing the impact on both the Lower and Upper Bristol Roads in particular.

It is clear from the Options Report, that the major growth opportunities are along the transport corridor between Bath and Bristol. Whilst there is significant transport infrastructure within that corridor, there are existing constraints. It will be difficult for respondents to the consultation to answer the questions posed without a clearer understanding of transport strategy (as opposed to policy). It is difficult to track down the Transport Visions and Objectives document.

Of particular concern is the apparent lack of any assessment of impact on the transport system, and the development of that system to support growth which would help in the selection of the areas for development.

GREEN BELT

References : INTRODUCTION TO SPATIAL STRATEGY PARAS. 4.13 TO 4.15

OPTIONS ON THE WEST OF THE CITY PARA. 3.9

TOPIC PAPER ON BATH PARAS.3.8 TO 3.11

The City of Bath is tightly constrained by the Green Belt designation and by the Area of Outstanding Beauty. These both support one of the principal characteristics of the World Heritage Site designations, the green setting of the City. The 2017 Banes study of the Green Belt around Bath concluded that on three of the four purposes of the Green Belt (as defined in National legislation) significant harm would be caused by the release for development of any Green Belt land close to Bath. This applies all around the City boundary. Similar conclusions were drawn along the corridor between Bath and Bristol. It should be noted 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.

There have been a number of studies of the Green Belt over the past ten years, both at a sub-regional level (by WECA) and by the Council. Generally, the aim seems to have been to examine whether or not the purposes of the Green Belt remain valid. It is concluded that they are, and in the case of Bath, particularly so as the Green Belt reinforces and protects key characteristics of the World Heritage designations. Across the District, the approach seems to be one of accretive Green Belt land releases, rather than a more fundamental consideration of the boundaries and purpose of the Green Belt. This is an approach we support.

There are examples elsewhere in the country where there has been a radical re-assessment of Green Belt designations in response to increases demands for new urban development and, in some cases, where areas for compensatory expansion of the Green Belt have been identified.

We suggest that this document should include clearer evidence of the analysis that led to the proposals for the land releases within the Green Belt.

This has special significance to the sub-area of Bath which requires special consideration of relationship between the City and the green setting, the special case of the WHS Listings imposing a stronger presumption against Green Belt release/threshold of evidence.

CAPACITY

**References: TOPIC PAPER IDENTIFYING STRATEGIC DEVELOPMENT LOCATION OPTIONS
PARAS. 5.13 TO 5.20
OPTIONS ON THE EDGE OF THE CITY PARA.3.7**

The capacity is referred to above and there is reference in the text to the City having a maximum capacity but it is not defined, this requires further clarification given the relationship between the Green Belt and the World Heritage setting. There must be a theoretical capacity for development within the City (principally for housing and employment) determined by site availability and the capacity of the transport system, and what might be termed its environmental capacity. A detailed understanding of the implications of growth within the City, and the balance with the need to maintain and enhance the quality of the urban area should be central to the development of the new Local Plan.

MAIN POLICY DETAILS THAT WE BROADLY SUPPORT IN THE PLAN

- The analysis of the issues as they relate to BANES & the City including a strong focus on Affordable Housing, Health Inequalities and Nature Recovery **(Bath Topic Paper para. 2.3),**
- Proactive support for the World Heritage Sites, ANOB and Green Belt **(Bath Topic Paper para. 1.3 and paras. 3.8 to 3.11),**
- Ambitions to be a Landscape City. **(Bath Topic Paper para.2.6 and para. 4.8),**
- The importance of addressing the issue of student housing / PBSA **(Bath Topic Paper 4.11)**
- Focus on development of brownfield sites within the City first before Green Belt sites considered.

THINGS WHICH WE FEEL COULD HAVE A GREATER EMPHASIS / CONSIDERATION

Reference: PRIORITIES AND OBJECTIVES PARA. 5.12

- Whilst the Plan repeatedly references the WHS and uniqueness of Bath and its global importance as a cultural centre the responding actions do not seem to grasp how the unique nature of the City is reflected in policies.
- A maximum capacity of the City needs to be defined, and this requires further clarification given the relationship between the Green Belt and the World Heritage setting.
- What does a “world class culture” means in practice?
- How the policies support a City that is “a wonderful place to live, to work and to visit”.
- Further consideration of growth in student numbers and challenge to the universities on ensuring a balance is maintained between the constrained City and future student numbers. There is a clear need for the universities to ensure a balance is maintained between the constraints of the city and the need to accommodate student numbers.
- How the uniqueness of the City can be enhanced by the plan including issues such as building heights, density, cumulative impact of developments in some areas and building quality.
- Linking transport to sustainability and development including standards on parking space, transport consequences of new residential developments within commuter range and the relationship with public transport networks (which are weak in some areas).
- Development of those sites which have not been developed some for many years (eg Cattle market, King Edwards School, former Bath Press site).

THINGS THAT SEEM TO BE MISSING

- Any reference to Transport SPD being updated.
- Use of out of date census data (2011) to inform parking allowances.
- Up to date Residents’ parking zone map.
- Guidance on Developer Travel Plans.
- The need for an Eastern Park & Ride facility and how that could be fulfilled.
- Riverside management within the City of Bath, especially those sites and moorings in the area between Pulteney Bridge and the junction with the canal. The Moorings policy only directly addresses rural moorings. Does the local plan offer an opportunity to resolve the misuse of City centre moorings in the heart of the WHS?
- Coverage of the importance of a high-quality public realm and maintenance thereof.
- The need to protect the City and its residents from adverse impacts of lighting and noise.
- “Giving people a bigger say” is listed as key strategy but the plan does not address how this will be done and sustained.
- There is very little identification of development sites on the eastern edge of the City.
- Student housing policy – the general approach to this is welcomed but it remains important to monitor and manage.

FOBRA

16th April 2024