

Federation of Bath Residents' Associations (FoBRA) – Comments on the planning application for the Bath Western Riverside Development Phase 2 (ref: 23/01762/EWREG03)

12 July 2023

The Federation of Bath Residents' Associations is an apolitical organisation that is an umbrella representative voice for 34 resident associations (representing about 5,000 residents 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.

FoBRA broadly supports the appropriate development of this site. It is a brownfield development, in line with the Local Plan, will provide mixed housing including much needed affordable housing. Cycling and electric vehicles are well provided for and there is good provision for linking to the river corridor for walking and cycling routes.

We observe that it is unusual for sites in Bath to be given outline planning permission which means that many of the important architectural details are not available at this stage. We would argue that build design and quality of materials are especially important within the City of Bath World Heritage Site (WHS). These cannot be assessed at this stage. Under a Reg03 application we understand that the council seeks outline permission for a site which it both owns and will be the approving authority. We would be concerned if too much flexibility were built into the outline planning permission which sets a precedent for the full application when made.

We also note that the impact on the surrounding infrastructure and services are difficult to assess in isolation from developments on adjacent sites in particular the St Williams development which has not yet received planning permission. A good example is the dependency on the new nursery intended for the St Williams site which is not yet finalised. As the outline planning application will set parameters for the full application, when submitted, there must be an expectation that any future application will be adjusted in response to the outcome of adjacent sites permissions.

We would like to highlight the following areas which should be considered at this outline permission stage:

1. **Car Parking Provision:** The application plans for 199 car parking spaces (all EV) plus provision for over 600 spaces for cycles. This suggests a ratio of 56% of car parking spaces to dwellings. Whilst we recognise this is within the Transport Supplementary Planning Document for a Zone B one bed dwelling of 1.0 we question whether this meets the aspirations for a sustainable low impact development in an urban location.
2. **Sustainable Community:** It's notable that the "standards" submitted by Active Travel England specifies various things that ought to be within 800m for a development to be appropriately sustainable. This application makes little provision for any amenities, schools, GP, food shops, public green space, community space but rather relies on other developments to provide these if at all which at this stage are uncertain (e.g. Nursey within St Williams). The application generally suggests that this development in isolation will have a negligible impact. However, it must be

considered together with adjacent developments which together will add over 1000 household in addition to the existing Western Riverside Phase 1. Amenities will need to be reconsidered in any full application and we suggest this should be transparent. It is a valid argument that the site must be more self-contained in order to justify the proposed level of parking.

3. **Transport:** The access to the main road system is poor and it's assumed most traffic will be via the junction on Windsor Bridge Road. That seems like the right aim in practice, but the application may be over-optimistic this will happen, and also about the impacts on traffic levels on Windsor Bridge Road, and Midland Road both north and south. The additional two toucan crossings may also add to congestion in the area. Windsor Bridge Road is already very congested and the site access (for St William site) is close to two big junctions. None of this is ideal and will need to be re-evaluated in the full application.
4. **Tenure Blind:** Whilst not fully detailed at the outline application stage we would like to reaffirm that the intention should be that facilities, for example entrance doors, should be tenure blind by design.
5. **Build design and quality:** As an outline application these are not specified. As part of the City of Bath World Heritage site these are particularly important so this will need to be fully addressed in any future application. We suggest any approval sets an expectation for the use of high-quality design and finish be set as is appropriate for a site within the Bath WHS.
6. **Community Space:** We note that there is no provision for an indoor community space in this development, nor is there anything in the existing Western Riverside Phase 1. We would support that across all the adjacent development somewhere an appropriate community space should be provided.
7. **Community Engagement:** We assess that the level of community engagement on this proposal has been very poor. It has relied largely on the St Williams engagement which itself is dated and relatively limited. The website link provided in the application leads to a website with very low content which does not provide enough information to enable meaningful commentary. There is no evidence provided of the levels of community engagement, the issues raised and any actions taken to address them. We feel this falls short of meaningful community engagement and will need to be improved for a full application.