

BATH RUGBY CLUB – APPLICATION TO CONSTRUCT A NEW STADIUM

Dear Mr. Godfrey,

We are writing this letter to you on behalf of the Federation of Bath Residents' Associations (FoBRA) to express our concerns about the project to construct a new stadium on the site of the existing Bath Rugby ground. The purpose of this letter is not to voice opposition to the proposal. FoBRA will be making separate representations on matters that are material to the current planning application. Our concerns are for two aspects of the project that fall outside the scope of the planning regime.

Our concerns relate to potential risks to the Council and to the residents of Banes arising from this proposal. As you know the application to reconstruct the Bath Rugby stadium has been submitted by Arena 1865 Ltd., a joint venture between the Rugby Club and Seta Sa. Little or no information is known about the funding arrangements for this project, but it can be assumed that the construction costs will run into many millions of pounds.

In terms of revenue earnings, the Rugby Club on its own we assume is not in a position to support funding on this scale. The income streams, in addition to the activities of the Rugby Club, will be a number of commercial activities carried out within the premises including conference facilities, bars and a restaurant. Also proposed are a number of non-rugby events with a limit of three major events (we will be seeking further clarification of what an "event" constitutes). Has the Council considered what might happen should the project fail, either before it is completed, or at some time further into the future? Are there any safeguards against this type of outcome and has the Council discussed this issue with the Bath Recreation Trust? Has the Council satisfied itself that the developing partner is a suitable partner? Bath could be left with a stadium either partially or fully completed and loaded with debt. For a normal commercial venture such risk would be principally the concern of the developer. In this case the consequences would be far reaching for the Council, the Bath Recreation Trust and the Community. Has the Council considered a "completion bond" clause to provide safeguards for the city?

Linked to this is our second concern. As mentioned above, the application for the proposal seeks consent for a number of non-rugby events and, no doubt, many of these will be inconsequential in terms of their impact on the City. However, concerns have already been expressed about the additional number major events that are part of the application, principally large music events. In the latest application, these have been reduced from four to three. Our concern is that given the need to ensure the financial viability of the enterprise, there will in the future be pressure to significantly increase the number of large revenue-earning events to the detriment of local residents' right to enjoy their homes.

Large events (including the top level rugby games) already impose significant and adverse impacts on the City, and especially on those who live in close proximity to the ground. The three proposed large-scale non-rugby events are likely to be music concerts which will have significant and adverse impacts on local residents, both in terms of excessive noise and the levels of lighting. Further, given the location of the stadium in the bowl surrounded by hills, the impacts of noise and lighting will be experienced over wide areas of the City

Limiting the number of large events (as is currently proposed) may or may not be judged to be enforceable in planning terms. Our concern is that in the future, in order to bolster financial returns, the Council may be placed under severe pressure from the operators to allow more, perhaps many more, major events of this sort. FoBRA represents members who will be adversely affected by the introduction of such large scale events. In the event of the application as it stands being approved, we would expect legal safeguards to be in place to ensure that the developer is limited to these three major non-rugby events, with no room for negotiation at a later date via either the planning or licensing routes. Is this an issue that the Council has considered and discussed with Arena 1865 Ltd and with the Trust?

Yours sincerely,

FoBRA Planning Group

LETTER TO CHRIS MAJOR, DIRECTOR OF PLACE MANAGEMENT, BATH AND NORTH EAST SOMERSET COUNCIL

Dear Mr Major,

Planning application 23/03558/EFUL Bath Rugby Club

The Federation of Bath Residents (FoBRA) is examining the revised application submitted on behalf of Bath Rugby to re-build the stadium on the Recreation Ground. As you will be aware, there is a significant amount of information submitted by the applicant on traffic and transport. We are aware that meetings have been held between Council officers and representatives of the applicant on issues relating to traffic and transport issues. Indeed there is reference in the EIA document 8, of a meeting held in August 2024 on Transport and Access.

Our concern is in seeking to understand the base data on traffic flows that have been used in the assessment of the impact of the enlarged stadium. In Appendix TA-03 there are two sets of data on traffic flows for two roads the London Road and Wells Road. There is no explanation of the two sets of data for each of the roads in the analysis.

Elsewhere, in EIA document 18V2, appendix 18.1 Cumulative Assessment – transport, there is an explanation of how the traffic flows for a limited number of the principal road links were assembled using traffic data from the traffic assessment of a number of recent, and some not so recent, major planning applications. We note that the tables showing the traffic flows that form the baseline traffic data do not indicate a source.

In the EIA document 08 there is data derived from a survey in 2024 on six principal roads within the City. We understand from the Transport Assessment Update November 2024 Section 6.3 that the dates of the 2024 Survey were from 1st to 8th June 2024. As you will be aware, North Parade Bridge was closed from around 20th May 2024 to the first week in July 2024. In our view, this throws some doubt on the efficacy of this data, especially on the traffic flows on the A36 Pulteney Road which is the principal road close to the Stadium.

We note that in the Highways Department's response to the previous application for the Rugby Club Stadium the Transport Consultant was asked to confirm that the 2022 baseline information was not affected by City Centre road closures.

We are aware that all the information submitted is the responsibility of the applicant, but much of the data being used by the applicant has come from the Council, and we would assume that the applicant had discussed baseline line traffic flow data with the Council.

The questions we have are to what extent has the methodology and outcomes of these analyses been discussed and agreed with Council officers? Given your concerns about the 2022 survey data, has the Council raised the same concerns about the 2024 survey data? Have the tables provided by the applicant within the large array of documents on transport assessment and impact been in anyway certified or agreed with Council officers?

In forming our own response to the current application, it would be helpful to know if the Council's Highways Department is confident that the baseline data used in the analysis of impact of the enlarged stadium on the road system are robust.

Yours sincerely,

FoBRA Planning Group