



BATH RESIDENTS
Federation of Bath Residents' Associations

29 November 2016

Mr Simon Metcalf
Development Planning and Management
Bath & North East Somerset Council
Trimbridge House
Trim Street
Bath
BA1 2DP

Dear Mr Metcalf

FoBRA - OBJECTION TO PLANNING APPLICATION TO REDEVELOP THE FOXHILL ESTATE (16/05219/EOUT)

FoBRA objects to the over ambitious and socially destabilising redevelopment plans for the Foxhill estate proposed in the subject outline planning application.

We have followed the development of the proposals in support of the Foxhill Residents' Association (FRA) since the beginning of the planning process and, while we do not argue that there is a need to regenerate some of the entire estate of 863 homes, especially where the properties are not in good repair, we are certainly not convinced that all of the 542 homes within the red zone should be demolished. According to chartered surveyors who are very familiar with the estate, the majority of these homes are in good material condition. Of the properties proposed for demolition, we understand that about 20% are owner occupied. Furthermore, many of the homes earmarked for demolition are of the same build and material state as many of those in the other 321 properties in the Foxhill estate (outside the red zone) and those in Southland, Combe Park, which as far as we are aware are not being considered for demolition. How can the developers prove and justify that that all of those being considered for demolition are beyond their useful lives? Surely there is a strong case for the more cost-effective refurbishment of most of the properties, particularly the bungalows and 'Cornish' houses, rather than their demolition?

We note that the proposal is to build 700 new properties on an 11 hectare site, yet we observe that the same number of properties are planned to be built in Mulberry Park in a site of 29 hectares. We appreciate that the latter site will also include a community hub, a sports pitch and a school, but we would contend that whatever the mix of properties, the proposed development site is much too dense, which would lead to 'chicken coop' size homes.

Within the emerging Policy of the draft B&NES Placemaking Plan, specifically in relation to Affordable Housing Regeneration schemes, Policy H8 states:

"There is a general presumption to support the redevelopment of social housing where the following criteria can be demonstrated to be met: (i) The physical condition of the housing stock is poor (i.e. the dwellings are substandard, or demonstrably not fit for purpose in the short-medium

term or similar); and/or (ii) There is a site specific socioeconomic justification for redevelopment led regeneration, considered alongside alternative options for re-modelling or refurbishment; (iii) If there is a loss of amenity space, policy LCR5 should be met. Where the principle of redevelopment is accepted, there is a presumption against the net loss of affordable housing, subject to viability considerations and other social balance considerations.

In our view, and from what we have heard from Foxhill residents and other stakeholders, criteria (i) is met but for only some and certainly not for most of the properties earmarked for demolition; and (ii) is certainly not met, there being overall excellent cohesion and well-being within the Foxhill estate, which has a stable and settled community. Most importantly, though, as underlined above, Policy H8 presumes against the net loss of affordable housing. Of the proposed 542 homes for demolition, 432 (c80%) are owned by CURO, 399 of which are affordable homes, yet the Affordable Housing Statement submitted with the application states that:

".....In order to remain viable it is not possible for the scheme to provide the same level of affordable housing as is currently provided on the Foxhill Estate. The Regeneration scheme will therefore deliver a minimum of 30% affordable housing, which when complete will amount to 210 affordable homes [of which 158 (75%) are for social housing]. When combined with the 210 affordable homes [also 75:25] that are to be provided at Mulberry Park, the combined scheme will deliver 420 affordable homes, equating to a slight increase in the current level of provision....."

The above statement clearly challenges Policy H8 and alarms FoBRA that the development is only "viable" if no more than 210 affordable homes (whatever the mix) are built to replace the current 399 affordable homes. This represents a loss of 241 social homes for rent. Is this the cunning deployment of 'smoke and mirrors' by the developers? It also indirectly questions the security and viability of the finance that should underpin a proposed redevelopment of this size. The affordable homes that are to be built in Mulberry Park should not form part of the Foxhill affordable homes equation and the Council should not be persuaded otherwise.

FoBRA understands that a widely held view of residents and other stakeholders affected is that while there has been much consultation carried out by CURO, the developers have rarely listened to or acted upon the genuine concerns being expressed. If true, this lack of constructive involvement and unwillingness to be more understanding and to compromise is disingenuous to say the least. Finally, and most importantly, is the deep concern for residents of the site who are likely to be displaced if the outline planning application is approved as proposed and who have already suffered three years of stress, uncertainty and anxiety. How will current owner occupiers be able to afford new homes, with the cheapest two-bedroom home currently being advertised in Mulberry Park for £325,000 while, for instance, the average market value of their current three-bed homes (with gardens) is about £200,000? How and where will current tenants of social homes be re-housed?

FoBRA recommends that the Development Management Committee rejects the planning application and invites CURO to resubmit a more coherent and less socially destabilising plan that focuses on more on refurbishment than demolition.

Yours sincerely

Nicholas Tobin

Vice-Chairman
FoBRA