

FoBRA's Response to B&NES' Core Strategy Consultation Document

Final dated 11 Jan 10

DW1 (page 20): Do you agree with this spatial Vision for Bath & North East Somerset?

FoBRA has serious reservations about certain elements of this spatial Vision. In particular:

- Much of Bath's transport infrastructure does not work at present. It must be upgraded to a satisfactory standard before there is any question of expanding the city to cope with population increase, and then must continue to be upgraded to keep pace. This must imply reduction of congestion, reduction of pollution to safe standards and an equitable parking policy. Early implementation of the Council's approved Public Realm & Movement Strategy would help.
- Sustainability should be the watchword. This means high rather than low-density development; collocation of jobs, shops and amenities with houses, coupled with a policy on maximum building heights; the public transport infrastructure already discussed; and agreement to a system of green upgrades for listed buildings.
- Any development to cope with population growth should take place firstly on brownfield¹ sites in the city before there is any move to create an Urban Extension (UE). Any development should be based on realistic targets, taking into account the recent recession and the ability of the physical and heritage infrastructure to accommodate it within the period. This may mean that no UE is needed. Many residents would prefer to see no UE, and are likely to oppose any option. Nevertheless, the consequences of Bath's not planning for an expansion of its population, some of which is well justified by the experts, would be unplanned development with even more commuting (and associated congestion and pollution).
- Existing open spaces must be retained. Intensive development on them must be avoided.

Our detailed comments follow the order of the consultation document.

DW2 (page 24): Is this the right set of spatial objectives for the District?

As a general principle, FoBRA believes that development should be spatially concentrated, with homes, workplaces, schools, leisure facilities, etc., built close together so as to minimise the need for regular travel and achieve the needed sustainability. However, given the sensitivity of the World Heritage Site, we believe the Council should consult on and implement a policy on maximum building heights to prevent encroachment on important sightlines.

¹ the definition of "brownfield" on p 172 should make it clear that it excludes parkland, playing fields, cemeteries, and (where material to amenity considerations) large private gardens and allotments

Research needs to be conducted into making, and action taken to make, Grade 1 and 2 listed Buildings (apparently 4000+ in Bath) more energy efficient in an acceptable way by very sensitive use of more effective glazing and insulation. (See also response to DW8)

Much of the current Affordable Housing (AH) policy sets out to help those on low incomes to part-buy and part-rent a property until such time as they can afford to buy it outright, when they “staircase” to full ownership. There are also a limited number of low-cost homes for purchase. The main beneficiaries are those on low incomes (< £17,500pa) and “key workers” on lower incomes. Whilst the above is laudable, it only helps people once, as the new owners can sell the property at market rates. Future purchasers of these properties see no benefit. The identified need for more and more AH suggests that consideration should be given to pursuing a higher proportion of rental-only options, so that more than one “person unit” benefits from AH. Thus, FoBRA proposes that (a) more rental-only AH units should be available, thereby permanently increasing AH stock, and (b) a mechanism is created whereby some of the “profit” from sale is given back to an organization that promotes and funds more social housing. (See also response to DW19).

Additions and adjustments need to be made to the text as follows:

- Strategic Objective (SO) strapline: Amend to read: " Reduce existing traffic and air pollution in Bath, improve access and reduce traffic congestion and transport related carbon emission and air pollution ”
- SO2 – Examine ways of improving sustainability of listed buildings
- SO6 – Introduce policies which discourage vehicles in Bath’s historic centre.
- SO6.4 – Amend to read “... to allow greater choice, to get around the district safely, conveniently and sustainably, and to reduce congestion and pollution from vehicles by encouraging walking and cycling, amongst other measures”.

All these are expanded in our later responses.

DW3 (page 24) : Are there any others (please specify)?

See above.

DW4 (page 35): What are your views on the two District-Wide spatial strategy options?

The difference between options 1 and 2 are not proportionately so great for Bath (8,000 vs 7,000 homes; 12, 250 vs 10,450 jobs) as for the other areas but the employment implications of Option 2 for the rural areas are worrying (1,900 new homes but only 700 new jobs) which looks likely to create an extra 3,000 commuters, necessarily travelling quite long distances and adding massively to congestion and pollution. FoBRA suggests that an intermediate option giving a bit less to Bath and a bit more to Keynsham and Norton Radstock without a significant increase in the rural areas, would be a better outcome. Secondly, while the need to heed Government targets for

population growth is understood, and for BANES to accept an appropriate share, every effort should be made to avoid creating an Urban Extension to Bath, with all the attendant compromise of green belt, World Heritage Site and Cotswold Area of Outstanding Natural Beauty. Lastly, there is a need for infrastructure to march in step with development (of housing, public buildings and work-places) and for concentration rather than dispersion, to maximise sustainability.

The focus for development on brownfield land needs to make clear that it excludes land used as parkland, playing fields, cemeteries, and where appropriate large private gardens and allotments.

DW6 (page 39): Do you agree with the targets suggested by the research or should we aim for higher targets?

While FoBRA is strongly supportive of renewable energy policies, it is aware that they can give rise to implementation difficulties in listed buildings; and would vigorously oppose devices which significantly intruded into the historic nature of Bath's World Heritage Site or its environs. FoBRA does not see any justification for fast-tracking renewable energy planning applications. See also our response to DW11.

DW8 (page 39): Do you think a local policy should be developed to support retro-fitting?

Yes. The Historic Environment team in BANES are rightly cautious about approving changes to listed buildings, of which there are a large number in Bath. Modern equipment such as solar PV and solar thermal hot water use non-traditional materials in places such as the roof which may be visible from the street, and there is a tendency to say that these should only be used in inconspicuous places (eg the inside faces of a double-apex roof).

There is a need for an intelligent local policy to be developed which permits, and indeed encourages, the maximum reasonable amount of retro-fitting of new energy equipment, while preserving the character and appearance of historic buildings and areas. Applicants, planning and conservation officers would then have a clear framework within which to operate. This would have the incidental benefit of making it easier to estimate the potential for such equipment in the city, and to interest suppliers into promoting their products for installation here.

DW11 (page 41): Do you agree that major development should meet higher targets than national standards?

Yes. House prices in Bath are well above the national average. Major new developments will also need to be of a high standard of design and finish if they are to be acceptable in or near the World Heritage Site. Both factors

imply that new developments will be built and sold/let at a higher than average price level. This should permit a requirement to be imposed for higher than national standards of resource and energy efficiency.

DW13 (page 41): Should the Checklist be required as part of planning applications?

Since these checklists have been formulated specifically by and for the South West, their use should be a required part of planning applications.

DW14 (page 41): Should use of the South West Sustainability Checklist be discretionary?

Since these checklists have been formulated specifically by and for the South West, the use of them should be mandatory.

DW15 (page 43): PPS25 and RSS Policy F1 sets out clear policy direction for the flood risk and SFRA provides the base for the sequential approach in flooding. Do we also need specific local policy in the Core Strategy?

Any local policy on flooding risk must be entirely consistent with national and regional policy. It is understood that a BANES flood management strategy, linked to the national regional policies, is being drafted. It needs to make clear to everyone where buildings can and cannot be put.

DW16 (page 44): Does the proposed core policy for Infrastructure Provision include all the necessary elements?

No. The broad issues that need to be considered have been listed in the first bullet of the Proposed Policy Framework (PPF), and the Infrastructure Delivery Plan should provide helpful guidance. However, as the policy stands, new developments could be built which are no more sustainable than old ones. For example, it would not be sufficient for new transport infrastructure to be based mainly on the use of private cars. There needs to be encouragement for each element of the infrastructure to be as sustainable as possible.

DW17 (page 45): Does the proposed core policy for Green Infrastructure (GI) include all the necessary elements?

GI is extremely important, especially when major developments may alter the character of whole areas. The B&NES district is fortunate to have a well-developed green infrastructure, which needs to be maintained and enhanced. However, the standard required of GI will be different in different areas. The policy as drafted is appropriate for use in the more rural parts of the district such as the Mendip Hills AONB. Within urban areas, and especially the heritage city of Bath, it needs to be a good deal more fine-grained, excluding (so far as capable of control) such agricultural land as may be detrimental to visual amenity (for example, that used for polytunnels or buildings erected

under the GPDO), and including parkland, playing fields, cemeteries, and as appropriate large private gardens and allotments.

DW28 (page 46): Does the proposed core policy for Community Services and Facilities include all the necessary elements?

Largely. However:

- Firstly, BANES is a landscape heavily constrained by geographical barriers, including rivers and hills, and the poor communications resulting from these. There is little spare land, and people cannot easily travel to community services and facilities. There needs to be specific recognition of the requirement for sites used for community services and facilities to be safeguarded and not released to other uses, including housing, without the strongest and most clearly established of arguments.
- Secondly, there needs to be specific recognition that school playing fields are community facilities in terms of this policy: it is not sufficient for their status to be inferred from general remarks about safeguarding facilities and extended schools.
- Thirdly, there is a clear need to provide and maintain a wide range of community facilities in all areas of the district. In Bath, specifically:
 - There needs to be a sensitive plan for use of the Recreation Ground, which maximises benefits to local people whilst maintaining the character and respecting the charitable purpose of this area.
 - The current Leisure Centre in North Parade Road is in need of refurbishment if not complete replacement.
 - Community facilities can be the focus for community regeneration in sensitive areas like the London Road and Whiteway/Southdown.

DW19 (page 51): Do the proposed policy parameters for meeting housing need include all the necessary elements?

The Policy Parameters do include all the necessary elements. Due to the very high indicated need for Affordable Housing (AH), FoBRA proposes that more Social and Intermediate Housing is available for rent, thereby increasing potentially the number of beneficiaries. Further, we agree the “comment” made that a preference towards more 2+ bed flats and houses is needed to help create more stable and balanced communities. FoBRA recognises that more AH is necessary, but has a concern that increasing the amount of AH from 35% to 50% could unnecessarily restrict the potential increase in new housing. It may be best to phase any increase in the AH% slowly, and vary by area and type of development. Whatever is decided, it is important that there is utmost clarity.

DW21 (page 55): Does the proposed core policy for High Quality Urban Design include all the necessary elements?

The highest quality urban design should be required. Referring to the associated Proposed Policy Framework (PPF):

- To bullet 4 of the PPF add: “Development proposals should preserve or enhance the character or appearance of the conservation area.”
- To bullet 7 of the PPF add: “The Council should develop a policy on building heights in Bath.”

DW23 (page 58): Does the proposed core policy for landscape include all the necessary elements?

- “Visually important open space” needs to be defined to include parkland, playing fields, cemeteries, and even some large private gardens and allotments. It needs to be clear that where land falls within this definition, whether or not it is formally allocated as such in the development plan, it is excluded from all policies privileging or prioritising the development of brownfield land.
- Amend Landscape PPF bullet 5 to read: “Identify, analyse, safeguard and where possible....”

DW24 (page 59): Does the proposed core policy for Historic Environment include all the necessary elements?

Historic Environment PPF bullet 1 add: “Development proposals in conservation areas should preserve or enhance the character or appearance of the area.”

DW25 (page 61): Do you agree with the Council’s preferred option for protecting the setting of the World Heritage Site?

FoBRA supports World Heritage Site (and its setting) policy option 2. We suggest the addition of a new paragraph (§2.118) to reflect the complex arguments over (for example) diversion and management of traffic around and near the WHS, as follows:

2.117a "The protection of the World Heritage Site and the protection of its setting may sometimes come into conflict and this will require difficult choices to be made".

To PPF bullet 2 add:

- “Seeking the assistance of the State Party (UK Govt – DCMS and English Heritage) to achieve the above two objectives.”

and add a new bullet to the PPF:

- “Protection of the World Heritage Site from the damaging effects of road traffic on the buildings and visual amenity of the Site.”

DW26 (page 65): Does the policy framework for a prosperous economy above include all the necessary elements?

FoBRA has several concerns about the proposed policy framework:

- The concentration on centres, although quite understandable, gives no sense of the district operating as a whole, with different parts complementing each other's role. Whenever some development is proposed in one area, critics complain that this gives an unfair advantage unless the same can be done elsewhere. This tends to happen over central vs outer Bath, and over Bath vs the rest of the district. It needs to be recognised that the parts of the district are inter-dependent, so that development in one place can be beneficial, not detrimental, to other areas. An important principle to establish is that development in Bath benefits the rest of BANES, and vice versa.
- It would be a mistake to stress the risk of over-concentration of growth in the centre of Bath. There are many substantial development sites along the river corridor, and it would be better for these to be re-used than for development to be pushed out to greenfield sites elsewhere. However to facilitate development in the city, it is obvious that modern infrastructure, especially innovative transport systems, is needed so that people can get about without using private cars and causing more congestion and pollution.
- Furthermore, if an urban extension to Bath were to become inevitable, it should have all the "necessary elements" established in it too.
- The list of rural activities, although they are only examples, appears to lean towards activities such as equine enterprise and visitor accommodation, which are already well supplied. Rural diversification is required, and there should be no bias against small to medium scale commercial and industrial facilities of any kind, such as artisan workshops for (say) blacksmithing, metalwork, pottery, woodwork, etc.,

DW27 (page 65): Is the hierarchy of centres identified appropriate and if not what changes should be made?

The principle of a hierarchy of centres sounds fine, but the present rules on this have unintended consequences.

- Policy S.5 of the Local Plan states *that proposals for development in the primary shopping frontages for Bath ... defined on the Proposals Map which result in the loss of a shop use (use class A1) from a ground floor premises will not be permitted.*
- Policy S.6 goes on to state that *proposals for A3, A4 and A5 uses within and adjoining the city centre shopping area defined on the Proposals Map will be permitted, provided that (either singly or*

cumulatively with other existing uses) they preserve or enhance the character or appearance of the relevant part of the Conservation Area and do not have an unacceptable impact on the retail viability and vitality of the centre or the amenity of local residents.

- The city centre shopping area extends to the top of Milsom Street, but there is no protection in George Street, so 34% of the ground floor frontages, including most of the larger properties, have now been converted into licensed premises. George Street is recognised by the Police as the largest hotspot for alcohol-fuelled antisocial behaviour in Bath, specifically as a result of this concentration of licensed premises. This has changed the character of this part of the Conservation Area and has a seriously detrimental effect on the amenity of local residents. Thus Policy S.6 has provided no safeguard in this major street adjoining the city centre shopping area.
- With reference to paragraph 2.128, FoBRA agrees that primary shopping frontages should be protected, and we believe that a greater diversity of uses can be permitted (but does not need to be encouraged) in secondary frontages. There needs to be a firm policy to ensure that this diversification does not lead to an excessive concentration of licensed premises, and we suggest that a quota should be set, such that licensed premises cannot occupy more than, say, 25 % of the ground floor premises in these secondary frontages.

DW29 (page 67): Does the proposed core policy for Accessibility and Transport include all the necessary elements?

No. FoBRA is surprised that the policy makes so little reference to air pollution. Rising levels of road traffic have led to high levels of air pollution, which present a serious threat to the health and well-being of the city's residents. The situation is already so bad that most of the Bath main road network has been declared an Air Quality Management Area (AQMA) in accordance with the Environment Act 1995. Some 5000 people live within the AQMA and are being exposed to high levels of air pollution, which are due almost entirely to road traffic. Taking action on these air pollution issues is just as important as the other issues listed in the Strategy. To emphasise the importance of this, the fifth bullet point in the PPD could be amended to read as follows:

- “Reduce existing traffic and air pollution in the Air Quality Management Areas (AQMA) in Bath and Keynsham and prevent its future growth there and elsewhere, by traffic management, parking policy, the encouragement of walking and cycling, amongst other measures and infrastructure improvements.”

This would allow the twelfth bullet point to read:

- “Reduce the adverse effects of transport on climate change and ameliorate noise and light pollution.”

Further:

- The Core Strategy needs to give a renewed boost to the development and use of public transport. There is a need for a denser network within Bath so that more regular daily journeys, whether for work or leisure, can be made sustainably, thus reducing pollution and congestion.
- In some circumstances there will be a place for innovative transport systems. These often require a dedicated track, and the Core Strategy should recognise that this may be a better use of limited space than existing uses.
- We welcome the references to encouraging walking and cycling, and would like to emphasise that it is just as important to improve arrangements for these activities in existing urban areas as it is when planning new developments. The Core Strategy should include the objective of making Bath “Britain’s most walkable city”.
- A particular effort is needed to find more sustainable ways for children to travel to and from school than by private car, since it is a matter of universal observation in Bath how much quieter the roads are during school holidays.
- Tour coaches should be required to drop their passengers at a point near the centre, so that they can spend time in the city on foot.
- The Council should study other ways of discouraging traffic in central Bath.
- We particularly welcome the policy of promoting measures to reduce through traffic, including HGVs. The issue applies to all through traffic, not just long distance traffic
- There is a need for an equitable, integrated parking policy in Bath. Parking spaces in the city centre draw in cars which add to pollution and congestion. The policy needs to look at the volume of parking in the city and at the edge, in Park & Rides, and also at the price of parking so as to encourage people to travel more sustainably.
- People in Bath need a public transport link to Bristol airport. At present this can only be done inconveniently by bus/bus or by train/bus. The obvious route would go right from one end of BANES district to the other, and could become a major transport link, boosting development of the whole district.

B1 (page 74): Do you consider this to be a fair portrait of the city?

It is right and fair in many respects. However:

- The extent of proposed housing growth described in §3.10 is challenging, particularly for Bath and retention of its World Heritage status.
- §§3.14 and 3.15 do not make enough of the scattered pockets of woodland and grazing within the city's limits and in particular their contribution to the World Heritage Site, to the character of the city and its tourist industry, and to the recreational facilities available to residents.
- The actual and potential role of tourism in the economy is underplayed and requires more emphasis: this underpins one of the most powerful arguments for taking conservation seriously.
- A section on health is required (not least because of the importance of the hospitals both as employers and as a hungry land use).
- A section on industry might be justified, highlighting the fairly recent rapid decline in industrial employment and the challenges this poses.
- §3.4 refers to 'landscape' but needs to make clear that it means greenfield landscape.
- Redraft §3.9 as follows, to clarify its meaning: "The draw of Bristol...is exacerbated by Bath's narrowly-based range of employment opportunities.'
- §3.19 cites the "Bath package" (BTP) as if that will be the solution. While this is important in its own right and represents a vital first step towards tackling the problems of traffic and pollution in Bath, it is essential that B&NES complements the BTP with other measures to reduce traffic coming into the city, to cut down on through traffic and to restrain visitor parking. A major reduction in traffic coming into and through the city, and a significant increase in walking and cycling, amongst other measures, are essential if air pollution is to be significantly reduced."

B2 (page 74): Are any elements missing or wrongly presented?

See answer to B1 above.

B3 (page 75): Do you consider this list to be a reasonable summary of the key issues identified in the portrait?

No. The following comments on the summary are made:

- The opening bullet: "Conserve and enhance Bath's built and natural environment, protect..." would be better as "Conserve and enhance

Bath's built and natural environment, historic culture and ethos; protect..."

- It needs to be accepted that (despite §3.10) there will always be a relative shortage of housing in a desirable but constrained location such as Bath: the third bullet should be redrafted "Respond to housing shortages both of open market, social rented and intermediate properties and to bring forward a suitable mix of housing types, without damaging the character and amenity of the city"
- The fourth bullet should be redrafted: 'if it becomes necessary to develop a new neighbourhood in an urban extension, this must be successfully integrated into the urban fabric of the city'.
- Bullet 8, on tourism, might usefully start: "Maintain *and enhance*..."
- Bullet 11 mentions congestion but needs strengthening and reference to pollution. It should be amended to read as follows:
 - "Reduce traffic congestion and the associated air pollution and improve access into, and circulation within, the city by modes other than the car."
- The last bullet is too vague and ambiguous; it could be improved with wording such as '...with a green infrastructure network within the city and extending into the surrounding areas to complement the built environment and promote recreational uses and walking/cycling to work.'

B4 (page 77): Does the vision capture the themes and ideas that should guide the future development of the city?

The Vision broadly captures the themes and ideas that should guide the City development. However, we feel that mention should be made of a "pollution-free" environment, and also that where the Vision refers to "complementing its cultural inheritance" it should instead say in "in keeping with its cultural inheritance".

In view of the importance of congestion and pollution in Bath, the 6th paragraph of the vision could well be amended to read:

"Traffic volumes into and across the city will be substantially reduced and air pollution reduced to levels which are safe for residents. Through traffic, particularly of HGVs, will be eliminated. Residential neighbourhoods will be served by vital and viable local service and shopping hubs which provide for the day-to-day needs of the suburbs. Residential areas will be linked to the city centre via sustainable modes of transport. A substantial proportion of short journeys will be made on foot or by bicycle."

Further, to reflect earlier statements, the following addition to the 7th paragraph of the vision should be made:

"All new development will be provided with the appropriate infrastructure, including transport infrastructure."

B5 (page 78): Do the objectives successfully break down the vision into a series of specific goals against which to evaluate a strategy for Bath?

Yes, but parking and student accommodation are not specifically mentioned, and more emphasis needs to be given to traffic congestion and pollution:

- Parking – more priority for City Residents should be planned, and an excellent public transport infrastructure should be available that moves people into and out of Bath City Centre frequently, affordably and in an environmentally clean way.
- In terms of student housing, an agreed and workable strategy is urgently required in what is likely to be a growing student population scenario to avoid some of the issues that have arisen in parts of Oldfield Park, for example, where students in multiple occupation houses have largely displaced families. This strategy should include more accommodation being made available “on-campus” but within the important constraints of appropriate development in or near the sensitive Cotswolds Area of Outstanding Natural Beauty and Green Belt. It should be noted that Bath University’s draft campus plan to 2020, proposes to increase the bedrooms there by 2,358 while assuming a mid-range student population increase of 2,765 – an under-provision of more than 400 student rooms, thereby exacerbating the City’s problem.
- Amend Spatial Objective 8 to read:
"Reduce traffic congestion and air pollution and maintain and enhance convenient circulation and access within Bath and between the city and sub-region. Improve the reliability and appeal of public transport, walking and cycling, and foster an integrated transportation network to contribute to the overall liveability of the city and its success as a visitor destination and business location."

B6 (page 79): Are these the right sort of questions that we should be seeking to find solutions to in the Core Strategy?

They are the right sort of questions, but this is not a complete list. Many other questions (that need answers) arise in this document, for example transport,

congestion, pollution and parking issues, all of which FoBRA has studied and would be happy to discuss..For example, a question which should be added is: **“What sort of transport infrastructure is needed to cope with the proposed expansion in Housing and Retail?”** as the present infrastructure, along with related congestion, parking and pollution issues, is less than adequate and will be significantly worse with the planned expansion. Another paragraph heading which should be considered is:

"Tackling existing congestion and providing a transport infrastructure for the proposed expansion in Housing and Retail."

B7 (page 81): Should the Core Strategy seek to fix certain elements of the strategy for Bath in this way and are there any realistic alternatives? and B8: What do you think of this approach?

The draft Masterplans for South and North Quays should be published and Consultation should take place on the massive development proposed therein so that its effect on the sensitive central area of Bath can be assessed and the area enhanced, without causing harm to the Outstanding Universal Values of the World Heritage City.

B8 (page 85) What do you think of this approach?

While the rationale for an integrated approach to the River Corridor seems sound, large-scale development there will generate considerable extra traffic volumes with which the existing road infrastructure, already overloaded, cannot possibly cope. The seventh bullet of §3.35 says that "the cumulative effect of potential change on circulation and movements needs to be understood" and yet what is needed is a serious and radical examination of how to reduce **existing** traffic, particularly HGVs, to make space for all the new traffic. Unfortunately nothing currently in prospect will solve this. The A46/A36 link would have no effect on the Lower Bristol Road. An HGV ban on Cleveland Bridge would not affect traffic travelling from Bristol to the south coast, although it could reduce A4-A36 Lower Bristol Road traffic. However, neither of these feature in B&NES' present plans. As much of this is already known, it should be under study urgently now.

B9 (page 86): Are the positive features that should be maintained and the negative features that are in need of attention correctly identified?

No. One other positive is the number of parks and open spaces within the Central Area. These should all be kept open and maintained to the highest possible standard.

Intensive development on open spaces such as the Recreation Ground must be avoided. Any proposal for major development on the Rec must first be publicly debated to identify the arguments in favour of such change, the

options for development elsewhere, and the limitations arising from its status as a functional flood plain. If any project is implemented, the needs of all citizens must be taken into account, and the stated charitable purposes must be upheld.

The third negative characteristic should be amended to read:

- Excessive traffic in historic streets, and conflict between cars buses, pedestrians and cyclists.

We believe that the present restriction on the conversion of historic buildings in office use in the city centre back to residential use should be relaxed as new office quarters are developed, so as to enhance the amenity of central streets.

B10 (page 89): What do you think of the proposed themes and spatial response for the expansion of the city centre?

FoBRA agrees that much more needs to be made of the River, and broadly accepts the Development Principles. Any development must be wholly appropriate within the historical setting. The balance between the tendency of the River Avon to flood and the development of the Rec, bearing in mind its functional flood plain status, needs to be considered (see B9 above as well). How will any new Rugby Stadium development fit in with these Development Principles?

Further enhancement of Bath may lead to more expansion and yet more transport issues. It is vital that Resident parking for an increasing number of City Residents is better addressed, and a cheap and efficient public transport infrastructure is developed that gets visitors into, around and out of Bath quickly and efficiently. Without this the economic and social benefits of expansion and enhancement will not be realised.

FoBRA particularly supports the introduction of more city centre residences (§3.38), the need to “repair and improve its less aesthetically pleasing parts” (§3.39), and, in particular, economic development along the River Corridor away from the City Centre in the Locksbrook vicinity.

B11 (page 95): What are your views on options 1a and 1b and options 2a and 2b?

Option 2b “Minimum Concentration” is preferable, but the numbers still look too high with 7,000 new homes, and it is probably undeliverable. The “bulky goods element of forecast retail capacity” would sit unhappily in Central Bath, and probably be far too expensive. This type of outlet seems better serviced where nearby parking is a requirement, and by definition would be outside the City Centre. In terms of office space, there should be a supply of cheaper office space outside or on the periphery of Bath. (Inside Bath is unnecessarily

expensive for some businesses). A possible way forward is therefore Option 2b for Bath and Option 1b for outside Bath.

Whilst the need to plan for population growth is understood, and for BANES to accept an appropriate share, every effort should be made to avoid creating an Urban Extension to Bath, with all the attendant compromise of green belt, World Heritage Site buffer zone and Cotswold Area of Outstanding Natural Beauty.”

B12 (page 95): To what extent should the Core Strategy seek to accommodate office space and comparison retail within the central area?

The Core Strategy should seek to do these things, but within the context of development in keeping with the historic built environment. We are very concerned with the scale of development proposed:

- The lowest amount of Office space in Central Bath (Option 2b) would mean **over 15 blocks the size of Kingsmead House**. We do not see how this is possible within the context of development in keeping with the historic environment. The higher option 1 would see 21 new Kingsmead Houses. This seems wholly unrealistic.
- In terms of new Retail, the lower requirement (Option 2b) equates to another development only 10% smaller than the new Southgate Centre. The larger option (1a) would be 10% larger. We do not see how either could be accommodated within Central Bath.

B13 (page 98): What do you think of the two options?

FoBRA is in favour of Option B for the reasons outlined in our response to B11 above. On the Option B point that there will be “less scope for residential use”. The corollary is that there will be more scope for residential use nearer the City Centre.

B14 (page 98): Can you see how the choices made for the Central Area will affect the choices to be made in the Lower Bristol Road Zone?

Yes, but the planned uses have to be complementary. The Lower Bristol Road Zone, in particular beyond the Windsor Bridge, offers scope for development of “bulky” retail, new offices, and light industrial. This would all be hard to accommodate within the City Centre.

New comments on paragraphs 3.79 (page 98) to 3.101 (page 101), where the document poses no question:

Paragraphs 3.79 to 3.80 (Newbridge Industrial Zone)

FoBRA agrees that the Newbridge Industrial Zone should be retained for employment-generating uses in the ‘B’ use class. Many traditional manufacturing locations in more central areas have disappeared or been reused for residential or office developments. It is important that a substantial

area should be reserved for industrial use, in the same way that primary retail frontages are protected from change.

Paragraphs 3.81 to 3.101 (Outer Bath)

FoBRA accepts that there is scope for residential and commercial development in the outer areas of Bath, especially if the three Ministry of Defence sites can be redeveloped, addressing their present inefficient use of land.

There is scope to make these areas more sustainable if a range of local uses and facilities is provided. For example there are very few shops in the northern areas, and only a handful in the other areas outside the local centres at Moorland Road, Chelsea Road, Twerton High Street, Bear Flat and Larkhall. We agree that there is a need for more convenience food shops.

We believe the rationalisation of the MOD sites is taking too long, and we strongly support the Council's professed intention to accelerate their release for more socially useful and sustainable purposes. This implies mixed use redevelopment. We need to see employment sites retained across the city, but are surprised at the apparent suggestion in §3.96 that Ensleigh should continue as an office location in its entirety. Being on the crest of the hill, this is a visually sensitive location, where buildings of more than three storeys would be inappropriate. Housing might be a better alternative in the fringes of the site which are most visible from the southern areas of Bath

We are sceptical about the magnitude of the office developments suggested. In outer Bath alone options 1b and 2b propose office space of more than 25,000 m², which is six times the size of the vacant Kingsmead House in the city centre, which must be the largest office building in Bath (see response to B12 above).

We believe more thought is needed into the impact of the proposed urban extension on the south western neighbourhoods, where there is a pressing need for economic regeneration. New transport, shopping, community and other infrastructure facilities need to be planned in together with housing and employment, so that the new and old areas can develop in a complementary fashion.

We note that the Royal United Hospital is said to have 4 ha of land that could be sold for redevelopment, and question whether thought has been given into using this for relocation of the Royal National Hospital for Rheumatic Diseases from its historic site, which must be becoming increasingly unsuitable for hospital use as access restrictions in the city centre are progressively tightened.

If secondary school provision is to be rationalised, sustainable transport options should be factored in to reduce the need for parental school-runs.

B15 (page 104): Do you agree with this vision?

The infrastructure of the city, especially in relation to transport, is already more heavily overloaded than that of many other comparable cities in the UK. An urban extension cannot be considered until a clear map has been drawn of how that overload is to be relieved; and any such extension would be heavily constrained by the expected movement flows which would be generated by it. Until such a map is provided and finance agreed, FoBRA cannot see how such an urban extension could be considered.

B16 (page 105): Do you agree with these objectives?

The objectives are wholly laudable but extremely ambitious. If they are to be delivered, the Core Strategy will need to spell out clearly how they can be delivered.

B17 (page 110): What is your view on the preferred location option West of Twerton (SWB 1)?

FoBRA is firmly in favour of a brownfield²-first policy to ensure that existing areas of the city are redeveloped before any steps are taken to permit an urban extension. Developers will naturally focus their attention on greenfield sites if allowed to do so.

The West of Twerton location is visually more intrusive than the Odd Down/South Stoke option, but, as it is closer to the Bath-Bristol axis, it could be made more sustainable from a transport point of view, and it is in a better position to help regenerate Twerton/Whiteway/Southdown. We believe that the Duchy of Cornwall would exercise a degree of continuing control over the quality of development.

B18 (page 114): What is your view on the Odd Down/South Stoke location (SWB 2)?

FoBRA is firmly in favour of a brownfield²-first policy to ensure that existing areas of the city are redeveloped before any steps are taken to permit an urban extension. Developers will naturally focus their attention on greenfield sites if allowed to do so.

We recognise that this location encroaches on the Cotswold AONB, and regret any development on such designated land. However the area is much less visually prominent from the World Heritage Site than the West of Twerton option, as it is south of the crest of the Odd Down plateau. Some of the necessary infrastructure is already in place (schools, a medical centre, playing fields) or planned (a Sainsbury's supermarket). Part of the site is already developed (St Gregory's Catholic College, housing at Sulis Meadows, the Odd Down Park & Ride).

² other than parkland, playing fields, cemeteries, and some large private gardens and allotments