

Sion Hill & Summerhill Road Residents' Association

<http://sionsummerhill.org.uk>

12th April 2024

Bath & North East Somerset Council

Planning Policy
Lewis House
Bath and North East Somerset Council
Manvers Street
Bath.
BA1 1JG

15 APR 2024

Received

Dear Sirs

Bath & North East Somerset - Local Plan Options Consultation Sion Hill Campus Site – Retain Existing Policy SB24 in the current Local Plan

We write on behalf of the Sion Hill & Summerhill Road Residents' Association (SHSRRA), in response to the council's request for comments on their Local Plan Options Documentation. Please note that SHSRRA covers an area of Lansdown with approximately 110 households and with a paid membership of approximately 75 members.

The SHSRRA takes a very active interest in the future use of the Bath Spa University site at Sion Hill and notes that the Local Plans Options Documentation suggests that the existing policy for the Sion Hill Campus site, which is defined in the existing Local Plan as policy SB24, is maintained unchanged in the new Local Plan.

Specifically, the Options Document states as follows:

Sion Hill

5.72 Owned by Bath Spa University (BPU) and currently allocated for housing. This site was allocated in the LPPU (Local Partial Plan Update) and the policy is considered to remain fit for purpose.

5.73 No change proposed to the existing policy.

The Options document invites respondents to confirm if they support this approach.

We confirm that SHSRRA partially objects to the retention of Policy SB24.

Whilst not objecting in principle to the possible redevelopment of the Sion Hill campus for residential use, we object to the proposed retention of the number of residential units allocated to the site which is described in policy SB24 as "around 100" 2 + bed new dwellings or apartments because it is too vague and in any event we believe that this number of 2+ bed apartments would be impossible to deliver whilst complying with the other requirements of the policy.

Specifically, we note that the Vision, set out in the existing policy SB24 for the site envisages:

- 220i. that the new dwellings are to be set within the existing built footprint of the buildings at the site.
- 220j. Any redevelopment proposal will ensure the protection and enhancement of the site's historic significance, sensitive landscape setting and ecological interests.
- 220k. There is scope through any redevelopment to enhance the site's walking and cycling opportunities close to and throughout the site, and potentially to deliver biodiversity net gain requirements on site through a combination of habitat enhancements and limited habitat creation (eg small urban orchard; allotments or rain garden).
- 220l. The area sits within an area of Bath which is currently undergoing consultation relating to Liveable Neighbourhoods. The aim of the scheme is to reduce the dominance of vehicles in residential areas while maintaining vehicle access to homes and businesses. It seeks to reduce traffic flows overall by making walking and cycling easier and more attractive than undertaking short trips by car. Liveable Neighbourhoods will look at the area as a whole, including through co-design with the local community, when considering the effects of changing routes available to traffic. The proposed development will have a role to play in facilitating, enabling and contributing to the Liveable Neighbourhood scheme for the Lower Lansdown area, and should not prejudice the Liveable Neighbourhood process or its objectives.

We further note that Policy SB24 states that development proposals should:

- 2. Deliver high quality, contemporary and sustainable built form and architectural design, informed by the opportunities presented by the site's sensitive historic and landscape context, and existing habitats. In seeking to preserve or enhance this part of the conservation areas it is anticipated that development will be within the footprint of the existing buildings at the site, with no encroachment into sensitive landscape areas, and lower in height than the existing buildings.
- 3. Demonstrate that all reasonable opportunities to reduce the embodied carbon emissions associated with the development have been explored, including an assessment of the retention and conversion of the existing buildings, in whole or part. If conversion is not considered feasible, other significant opportunities to reduce embodied carbon emissions should be incorporated into development designs.
- 4. Optimise the solar energy potential of development by careful design and orientation.
- 5. Ensure that the landscaped garden area located to the south of the site, as depicted on the concept plan, is designated as public open space.
- 6. Protect and enhance existing landscape infrastructure and habitats within the site, including trees, hedgerows, grassland habitats, planting and landscaped garden areas. Protect all habitats from increased light spill. Deliver biodiversity net gain of at least 10% in accordance with Policy NE3a. Opportunities to deliver 10% biodiversity net gain within the site curtilage should be fully explored and tested before any off-site measures are proposed.
- 7. Provide a minimum of one nest or roost site per residential unit, in the form of integrated bird and bat boxes within new buildings, and/or as standalone features within the public realm, such as bat walls and swift towers. Additional features such as log piles, insect hotels, bee bricks, hedgehog connectivity measures and green and brown roofs / walls are also required. All new garden boundaries should be permeable for hedgehogs.

- 8. Retain and enhance substantial boundary planting to protect both short and long views of the site from across Bath.
- 9. Provide a comprehensive network of walking and cycling public access routes through the landscaped gardens as broadly illustrated on the concept diagram. These will need to be designed to respect the landscape and historic sensitivity of the site. Vehicle and active travel access will need to be segregated. Development proposals will be expected to enhance the pedestrian and cycle environment for north-south movements, broadly along the alignment of Winifred's Lane at the eastern side of the site. This is likely to be through providing a route within the site, which is likely to require the relocation of the existing telecommunications unit at the junction of Sion Hill and Winifred's Lane, but options to reduce traffic flows and speeds along Winifred's Lane to make the route safe and suitable for pedestrians and cyclists should also be investigated, within the context of the objectives of the Liveable Neighbourhood Project. Routes through the site must include appropriate connections to the wider walking and cycling network, including safe crossings where necessary.
- 10. Development proposals must ensure safe and attractive walking routes to key destinations, including bus stops on Lansdown Road. A Transport Assessment for the site will be required to identify potential barriers for walking and cycling, and propose solutions as appropriate. Measures for investigation and delivery where necessary should include, but not be limited to:
 - a. Pedestrian crossing facilities over Lansdown Road in the vicinity of the junction with Sion Road;
 - b. Traffic speed reduction measures on Cavendish Road and/or Winifred's Lane; and
 - c. Improvements to cycle routes to the city centre, including options using alternatives to Lansdown Road.
- 11. Undertake a detailed historic environment assessment, and where necessary evaluation, in order to identify and implement appropriate mitigation.
- 12. Ensure continued access to public sewer running from north to south of the site.

We confirm that we strongly support the retention of the various redevelopment parameters set out within the current policy and as listed above (specifically paras 220i – 220l inclusive and paras 2 – 12 inclusive). We believe that they will help to ensure a sensitive residential redevelopment of the site, appropriate for the location and complementary to the existing locality.

However, we do not believe that it would be possible to deliver “about 100” apartments whilst still complying with the redevelopment parameters as set out in the current policy. Our concern would be that without a downward amendment to the number of living units allocated to the site, that the number of apartments proposed by a future developer could take precedence over the other redevelopment parameters and requirements and specifically those in para 2 above. In such a situation, it would not be the first time that a developer has suggested that a site is not viable for redevelopment without increasing the number of units to be built upon it and relaxing some of the policy constraints. Given the sensitivity and the overall context of the site (as set out in policy SB24) this cannot be allowed to happen here.

Furthermore, we have serious concerns about how this number of apartments might impact the current Liveable Neighbourhood Scheme and ETRO (Experimental Traffic Regulation Order) 3492 in terms of traffic generation. In particular, the planned closure of Winifred's Lane will mean that any vehicular access to the site from Winifred's Lane would not be possible and that

all vehicular traffic generated by the site will be required to use part of Sion Hill (West) and part of Sion Road between its junctions with Sion Hill and Sion Hill Place.

At the present time the existing policy places no restrictions on the number of vehicles that an occupier of one of the apartments may retain and we are extremely concerned about the impact of so many additional vehicle movements on the locality. We do not support the current ETRO 3492 proposal, in any event, because in our opinion the parts of Sion Hill and Sion Road, referred to above, do not have the capacity for the anticipated existing additional traffic that will be generated by the closure of Winifred's Lane. The impact of a redevelopment of the Sion Hill Campus to provide about 100 2+ bedroom apartments and the vehicle movements that will be generated, as a result, will significantly exacerbate the situation further.

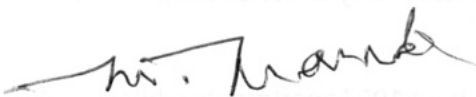
For all of these reasons, we believe that the existing policy should be amended so that it states that no more than 60 2+ bed apartments and town houses should be allocated to the site but otherwise that the policy SB24 should remain as currently drawn.

We note that the residential redevelopment of the nearby former 6 acre Royal High School Hope House site produced 58 no. 1, 2, 3 and 4 bedroom new homes. The Hope House site occupies a comparable site in terms of size, location and sensitivity but has better road access than the Sion Hill site. We believe that this should act as a benchmark for the Sion Hill Campus site and supports our contention that the number of units allocated to the site should be reduced.

Summary:

- SHSRRRA supports policy that will encourage the sensitive residential redevelopment of the Sion Hill Campus.
- However, SHSRRRA partially objects to the retention of Policy SB24, in its current form, in relation to the allocation of about 100 2+ bed units to the site.
- SHSRRRA strongly supports the retention of all other aspects of Policy SB24 - with the exception of the allocated number of residential units.
- SHSRRRA believes that the number of residential units allocated to the site – which might include apartments and town houses - should not exceed 60 residential units.

Yours faithfully



Michael Maude
Acting Chairman SHSRRRA



Sally Parkes
Secretary SHSRRRA

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