**Background**: Lower Lansdown residents have lived with significant traffic impacts of residential intensification in the area at Ensleigh, Hope House and Somerset Place as well as Kingswood Prep school expansion and Queens Square displacement through our neighbourhood. Alongside this Sat Nav aids are bringing increased levels of through traffic speeding along our residential roads which are narrow made up of on street town houses with very little defensible frontages and not made to accommodate high volumes of speeding vehicles.

**The lack of adequate speed signs , large enough to have and impact and the lack of road sleeping policemen to slow the cars and lorries on the hill past Lansdown Place west will soon result in a catastrophic accident and death.**

**Act now please**.

Given that Planning legislation is changing, removing ambiguity in the Local Plan will ensure that future development in a World Heritage location is consistent with the Local Community’s ambition for the site, minimise traffic impacts into the area and certainly not displace through traffic onto neighbouring roads to benefit developers.

I **do not wholly support the provision of appropriate density and quality of new housing, including affordable housing in our area unless it is delivered in a way which minimises traffic impact on our residential, heritage streets and meets the 2030 target and Liveable Neighbourhood Policy.**

**The lack of adequate provision of parking for residents visitors at Hope house has created major parking problems on Lansdown Place East and West** . Page 5 paragraph 2, page 5 " of the above document specific aim is to reduce overall traffic numbers rather than pushing traffic elsewhere"

**Response to the updated plan as published July 2021:** I find that some of the changes made since January 2021 contained in the updated plan are not detailed, are not justified, are not sound, are not consistent with the Council’s Liveable Neighbourhood policies and do little to meet the Council’s own Climate Emergency commitments to become Carbon neutral by 2030.

The updated plan contains changes that have been made without local community engagement and would allow development which could be detrimental to the neighbouring residential area without area wide traffic mitigation . We have proposed additional text or changes to the text and a diagram change underlined to be made. These are summarised:

**SB 24 Sion Hill - Site allocation page 130 , Context**

* **220g page 130**: the description of the neighbouring area should accurately detail the full sensitivity of this site which encompasses far more heritage assets than just Somerset Place and Sion Hill Place. This is extremely important and should be officially recorded in the LPPU. Please add The entire neighbourhood the site sits within of Lower Lansdown is made up of Grade 1 and 2 listed heritage assets. Sion Hill, Cavendish Crescent, Cavendish Place and St James Square, including Somerset House, Ivy House and Doric House and of particular historic importance Lansdown Crescent is listed in the World Heritage citation for Bath and protected by a width restriction TRO of 6’6” (along with Cavendish Road).
* **220h. page130:** Please correct the distance of the site to the regular bus service on Lansdown Road. Regular services available on Lansdown Road less than 400m from the main entrance to the campus at Sion Road, with a flat, level walk and pavements both sides of Sion Road. This ensures that the required Developer guidance contained within the B&NES T&D SPD Accessibility Assessment appendix E is accurate.
* **220j page 131:** Please add that any redevelopment proposal will ensure the protection and enhancement of the site’s and neighbouring Heritage areas’ historical significance, sensitive landscape setting and ecological interests

**Policy SB24 Sion Hill Development requirements and Design Principles page 131**

* **Point 1. The increase from 60 to 100 dwellings** .
* I seriously challenge the increase from 60 to 100 market sale dwellings 2+ bedrooms without detailed allocation of maximum vehicle provision per dwelling defined in the updated SPD.
* **This will be a repeat of the inadequate parking provision for Hope house**.The traffic impacts are not justifiable in Lower Lansdown, an entire area experiencing significant rat running and speeding problems.
* The lack of a RPZ in the Sion Hill area will bring many more vehicles associated with this site into our area.
* There has been inadequate explanation for this increase from 60 to 100 and no local community consultation for such intensification of development in a neighbourhood which has already absorbed hundreds of new homes and their associated traffic impacts in recent years and on a historically, ecologically and archaeologically sensitive site in the heart of World heritage area.
* I challenge the absence of detail regarding the provision of affordable homes. I expect provision to be stated at LPPU stage.
* **Point 9 page 132:** I fully support the protection of the parkland, the continued provision of an East/West pedestrian pathway, and the proposed North/South pedestrian and cycling routes within the site boundary , in particular the creation of the South/North pathway through the site created by moving the Telecoms box and making a pedestrian opening at this point on Sion Hill are of real gain to our community.

**But** the reference to changes outside the site boundary to Winifred’s Lane point 9 are problematic ; Winifred’s lane improvements should not be achieved through displacement into neighbouring residential roads. Rat running along Cavendish Road uses both Winifred’s and Lansdown Crescent. Changing traffic flow on Winifred’s alone would simply move traffic to Lansdown Crescent and along Somerset Lane and Sion Hill too.

* Therefore listing improvements to Winifred’s Lane in isolation benefits the developer alone (given that pedestrian provision is already made within the site boundary according to the plan) and is unacceptable. A firm and stated commitment to the need to avoid displacement into neighbouring heritage streets such as Lansdown Crescent, Somerset Lane and Sion Hill is required.
* I would expect there to be an explicit reference at **point 9** consistent with Liveable Neighbourhood principles. “Options to reduce traffic flows and speeds along Winifred’s Lane” needs to be removed or qualified **“WITHOUT displacement to nearby residential streets of Lansdown Crescent,Lansdown Place east and west, Somerset Lane or Sion Hill.”** This reference should be made on the legend of the site map too **diagram 26.** This would be compliant with the Council’s own Liveable Neighbourhood policy of traffic flow reduction not displacement.
* **Diagram no 26 page 133** :
* The map contains a misleading/incorrect red/orange arrow running up and down Winifred’s lane, this arrow should not be double ended, **the arrow should be single ended pointing northward to reflect the actual northward direction of the lane.The resulting traffic conflicts would be chaotic resulting in cars coming to the Sion Hill, Cavendish road, Winifreds lane and Somerset lane from 4 different directions**.**We require the red/orange dotted arrow to be corrected for the purposes of the local plan to accurately reflect the existing northbound direction of traffic using Winifred’s.**

(This 2 way arrow is ambiguous and if retained could suggest a traffic system splitting from somerset lane/Winifred’s lane junction southbound/ northbound . It would reduce rat running for Winifred’s lane at only the very southern end only to displace this traffic straight onto both Lansdown Crescent and also Somerset lane itself and possibly Sion Hill.)

* The map is also contradictory to the map contained within the T&D SPD supplementary appendix Appendix A-1 Cycle network maps, map of Bath shows the correct directional flow of northbound on Winifred’s Lane.