**Background**

Lansdown Crescent Association are writing to provide feedback and objections to certain changes made to the Local Plan Partial Update since our January 2021 submission regarding the Bath Spa University proposed change of use at the Sion Hill Campus pages 130-132 of the LPPU.

We represent 177 members in the area, from Lansdown Place East, Lansdown Crescent, Lansdown Place West, Upper Lansdown Mews, Dixon Gardens, Somerset Place, All Saints Road, Somerset Lane, Sion Hill East and Winifred’s Lane which immediately borders the campus.

We support the Council’s Climate Emergency 2030 carbon neutral target, and the Liveable Neighbourhoods Policy. We support the provision of appropriate density and quality of new housing, including affordable housing in our area but delivered in a way which minimises traffic impact on our residential, heritage streets and meets the 2030 target and Liveable Neighbourhood Policy. Specifically page 5 paragraph 2, page 5. " The aim is to reduce overall traffic numbers rather than pushing traffic elsewhere"

Our Community has established a Community speedwatch scheme (with neighbouring Resident Groups), we monitor traffic along Cavendish Road and Winifred’s Lane several shifts per week and gather data on traffic flows into neighbouring streets, volumes and speeds. We are therefore qualified to make fair judgments on the impacts that the update to the Bath Spa Sion Hill campus would have on our area unless amendments are made and ambiguities removed from the LPPU.

**Our response to the updated plan as published July 2021:**

We 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 and ensures that the correct allocation of maximum car provision per dwelling can be discounted correctly at development stage.
* **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** .
* We 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. The traffic impacts are not justifiable in Lower Lansdown, an entire area experiencing significant rat running and speeding problems.
* 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 a World heritage area.
* We challenge the absence of detail regarding the provision of affordable homes. We expect provision to be stated at LPPU stage.
* **Point 9 page 132:** We 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 at the Southern boundary and making a pedestrian opening at this point on Sion Hill. These are of real gain to our community.

**But** the reference to changes outside the site boundary to Winifred’s Lane point 9 are problematic without clarification ; whilst Winifred’s lane certainly needs improvements this should not be achieved through displacement into neighbouring residential roads. We know that rat running along Cavendish Road then peels off to 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 to our Community. 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.
* We 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, 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.** **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 . If this is the intention then it is unacceptable for our community. It would reduce rat running for Winifred’s lane at only the very southern end only but displace this traffic straight onto both Lansdown Crescent and also Somerset lane itself.)

* 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.

**The SPD Given the council has a clear remit to deliver Liveable Neighbourhoods and commit to the Climate Emergency target of becoming carbon neutral by 2030 we require a more ambitious environmental target for the site.**

The traffic impact of this increase will be felt across the neighbouring residential roads and there is no clarity in the LPPU or SPD for how many cars will be allocated per dwelling. This lack of clarity could provide an open assumption for future developers of 2+ cars per dwelling. The Council should be leading the way in terms of sustainable developments and be specific on requirements to meet the Climate Emergency target at Local Plan publication. The allocation should be firm and less than 1 car per dwelling (plus an allowance for disability provision).

The 2015 Car Parking Strategy is out of date and would allow (page 5: for a minimum of 2+ cars per dwelling) without any requirement for a maximum or for them to be ULEV. The 2018 update doesn’t appear to revise this figure. The current SPD in consultation discusses setting a maximum but doesn’t define this figure either and the accessibility assessment in appendix E provides the Developer an option to apply the discount rather than BNES Officers.

* All dwellings as part of the original 60 initially proposed should be allocated a maximum car per dwelling. No more than 1 car per dwelling and this to be accommodated on site. These cars should all be required to be ULEV.
* Any additional dwelling unit beyond the 60 initially proposed should have zero car allocation.
* No dwelling on the new Sion Hill development to have on street RPZ allocation in the neighbouring streets/zones.
* Surrounding streets need the protection of RPZ. The properties and their visitors in the development get no access to this RPZ in perpetuity.

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 Local Plan Partial update should more carefully define the ambition for the site to be compliant with the Council’s own Liveable Neighbourhood Policy and Climate Emergency Commitments. The SPD should ensure maximum car allocations are defined in the areas outside the city centre but within the outer zone, where regular bus routes operate within 400m and at a site walkable to town.

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.