**SB 24 Sion Hill - Site Allocation – LPPU August 21**

In my capacity as a Lansdown ward councillor, I would like to raise the following concerns in relation to the proposal for the Sion Hill Campus (SB 24), LPPU consultation, August 21, based on feedback received from nearby residents and residents’associations.

There are significant changes to this proposal compared to that consulted on in Jan/Feb 21, about which there has been no engagement with the local community or ward members.

**Concerns**

1. **Increase from 60 to 100 apartments** *(SB4 point 1)*

There are significant concerns about the proposed increase in number of apartments and intensification of the site in an area which already has existing traffic and parking problems (see below). The following problems are anticipated:

* Increased residential traffic
* Increased pressure on parking in the Sion Hill area
* Potential conflict with the *“anticipation that the development will be within the footprint of the existing buildings and lower in height”* (paraphrased)
1. **Impact on traffic**

There are existing problems with the volume and speed of traffic in this location due to the factors listed below many of which represent recent changes. This proposal for 100 apartments will exacerbate the already hazardous traffic situation.

1. The established use of **Winifred’s Lane as a south/north cut-through** and the consequences of this on walking and cycling safety and quality of life generally for nearby residents.
2. Impact of **two new residential developments:**
* **Ensleigh site** (over 300 new homes, 72 extra care flats, 210 place primary school, )
* **Hope House** (54 residential units)
1. Impact of the **recent reconfiguration of Queen’s Square (2020)**
2. Impact of the **expansion of the Kingswood Preparatory School provision (c.2018)**
3. An existing and significant problem with **commuter/leisure parking in the Sion Hill area,** bringing traffic into the area, exacerbated by the introduction of the CAZ.

These traffic problems are evidenced by:

1. Many reports of **traffic accidents** in the location of Cavendish Road/Winifred’s Lane/Lansdown Crescent, with recent damage to property.
2. Significant **safety issues arising from the volume and speed of traffic** along Cavendish Road, evidenced by:
* An active Community Speed Watch scheme monitoring traffic along Cavendish Road and Winifred’s Lane several times per week
* Recent installation of speed camera signage on Cavendish Road (2020)
* Recent Width restriction TRO for Cavendish Road and Lansdown Crescent (2019)
1. A **Liveable Neighbourhoods submission (16 Feb 21)** for Cavendish Road/Winifred’s Lane/Lansdown Crescent seeking to address issues noted above.
2. **Impact on Parking**

There is no clarity on the car parking allocation per dwelling. Agreement of an acceptable limit is important to avoid further exacerbation of traffic and parking problems in this location.

The 2015 Car Parking Strategy and 2018 update allowed for a min of 2+ car per dwelling, with no maximum. The current SPD for the emerging policy (under consultation) gives guidance of a maximum of 1.25 spaces per two bed dwelling for Zone B, Outer Bath, which includes Sion Hill. An extra 125 vehicles would have a significant impact in this location. Appendix E to the SPD provides for an accessibility assessment which allows for the parking standard to be tailored to the site specific situation. Since this is an accessible site with good transport links to the city centre, a maximum of one car per dwelling would seem more appropriate and 0.5 car per dwelling (as per Zone A) desirable.

It is requested that the following parameters are set out within the principles for development due to the sensitivity of the site allocation. Potential extension of the Central Zone to include the development site should be considered:

* A maximum of 1 car per dwelling
* Residents’ parking zone protection for the surrounding streets
* No Residents’ Parking Zone allocation for residents of the new development
1. **Lack of affordable Housing**

There is no statement on provision of affordable housing.

1. **Potential for traffic displacement arising from improvements to Winifred’s Lane** *(SB4 point 9)*

The statement: “Options to reduce traffic flows and speeds along Winifred’s Lane to make this route safe and suitable for pedestrians and cyclists should also be investigated” is broadly welcomed. Vehicles accelerate up through the Winifred’s Lane creating an unsafe and unpleasant environment for pedestrians, cyclists and residents of the Lane.

However a number of concerns have been raised relating to these improvements:

1. The risk of displacement into neighbouring residential roads, that is, via Sion Hill East to Lansdown Crescent or via Sion Hill West to Sion Road.
2. It is important that the existence of a recent (Feb 21) Liveable Neighbourhoods submission for Winifred’s Lane/Cavendish Road/Lansdown Crescent is taken into consideration when considering the future use of Winifred’s Lane.
3. A s106 agreement arising from the Somerset Place development recently provided for a stretch of pavement connecting Winifred’s Lane with the top of Cavendish Road via steps but this only mitigates a small proportion of the route, is not well advertised and does not enable disabled access.
4. The intention of the double ended orange line along Winifred’s Lane in the map diagram no. 26 is not clear. Does it indicate proposed direction of traffic flow or does it simply suggest the extent of the area where improvements are being considered?
5. **Neighbouring Heritage Assets** *(220g, SB24 point 2)*

In “Context” it states that “Various listed building are located in the immediate area surrounding the site, including Grade 1 listed buildings of Somerset Place to the east and Sion Hill Place to the north”.

This statement does not adequately reflect the sensitivity of the area. There are many Grade 1 and 2 listed heritage assets nearby within Sion Hill, Cavendish Crescent, Cavendish Road and Lansdown Crescent. Somerset House, Ivy House and Doric House are of note in close proximity to the site.

**Positives**

The following elements of the proposal are particularly welcome and must be retained through the planning application process:

1. Development to be within the footprint of existing building and lower in height than the existing building.
2. Short and long views of the site from across Bath will be protected, together with enhanced boundary planting.
3. Recognition that there is no footway on Winifred’s Lane and that it is an unattractive environment for pedestrians and cyclists due to lack of infrastructure and traffic flows and the need for improvement of this environment to facilitate and encourage walking and cycling.
4. Traffic reduction measures on Cavendish Road and/or Winifred’s Lane.
5. Delivery of pedestrian crossing facilities over Lansdown road in the vicinity of Sion Road.
6. Protection and enhancement of existing trees, hedgerows, grassland habitats, planting and landscaped garden areas.