



**BATH AND NORTH EAST SOMERSET LOCAL
PLAN PARTIAL UPDATE**

Regulation 19 Consultation

Representations by Hampset Cricket Club

October 2021

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ASSOCIATES**

The representations below set out the response of Hampset Cricket Club (HCC) to the matters identified in the title banners.

PART 1	DISTRICT-WIDE SPATIAL STRATEGY AND POLICIES
Policy	DW1 – District-Wide Spatial Strategy
Pages	16-26

OBJECTION

There is a lack of transparency in the Plan itself concerning the overall residual housing land requirement in the period to 2029, and the specific provisions that are being made to meet it. Summary tables should be included in this section to provide clarity on the supply side in terms of the portfolio of sites on which the Council is relying to meet the overall residual requirement.

Whilst some details are set out in the evidence base, and in particular the topic paper on ‘Housing Supply’, the Council has stated on the consultation web site that the documents are for information only, and they are not inviting comments on them. This being the case, then it is imperative that relevant, appropriate and sufficient information is included in the Plan itself regarding the sites on which reliance is placed to meet the overall housing requirement in the period to 2029, those provisions are available for public scrutiny through the examination process, and they are subsequently available as a benchmark against which the housing land supply and delivery can be monitored and assessed.

Even the topic paper itself includes only a partial assessment of overall supply since it lists only those sites where ‘additional’ supply has been identified through the partial update. However, it provides little in the way of justification for those provisions, and the assumptions that it has made on their availability and deliverability, particularly those sites that are already allocated in the Placemaking Plan, but have yet to come forward for development. Those sites include:

- **Policy SB14 - Twerton Park, Bath (80 dwellings):** this site was refused planning permission by the Council and therefore there is uncertainty regarding its deliverability and capacity.

- **Policy BS17 - South of Englishcombe Lane, Bath (40 dwellings):** having granted itself planning permission, the Council has subsequently resolved not to transfer this site to the authority's development company having regard to concerns regarding the impact of its development on the tufa flushes, a rare geological phenomenon. The Council is understood to be exploring other options for the use of the land.
- **Policy SSV22 - Former Paulton Printworks (80 dwellings):** as a site that was allocated in the former BANES Local Plan and has not come forward some 14 years later, its availability and deliverability would appear to be in doubt.

In addition, the ability of the proposed new allocation at Sion Hill, Bath to deliver 100 dwellings given its landscape and heritage sensitivities, would seem to be uncertain. Moreover, the assumed capacity is based on the development of apartments, and for which the market is uncertain in the wake of the Covid-19 pandemic with consumer preferences having shifted away from apartments to houses with gardens providing more internal space for home working and external private space for social distancing.

There is also no evidence that a thorough review of existing allocations has been undertaken, and specifically those on which reliance was placed at the time of preparation and adoption of the Placemaking Plan to deliver housing towards the very end of the plan period, and not least progress on the need to relocate existing occupiers. The following sites would seem to be of particular uncertain deliverability:

- **Policy SB3 – Manvers Street (60 dwellings minimum):** given that this requires relocation of the Royal Mail Sorting Office to an alternative central site, it seems highly unlikely that this site will be available to deliver dwellings in the period to 2029.
- **Policy SB6 – South Bank (100 dwellings minimum):** development of this site involves relocation of existing car dealerships, together with Travis Perkins Builders' Merchants. Again, given the shortage of alternative sites in Bath, it seems unlikely that this site will be available to deliver housing in the period to 2029.

These are just a selection of allocated sites that seem of uncertain deliverability during the period to 2029. On the supply side there a number of additional sites included in the Council's trajectory that are unlikely to come forward and/or extant permissions to be implemented.

In not conducting a comprehensive review of the supply side, the Local Plan Update has failed to perform in relation to a 'crucial role' that it set for itself "... to maintain the supply of new housing in order to meet the Core Strategy housing requirement with sufficient flexibility to take account of changing circumstances"¹. To this end it was acknowledged that a key proposed element or scope of the partial update included "replenishing the supply of housing, primarily through the identification of new sites and reviews of existing allocations, in order to ensure a continuous five year housing land supply and sufficient supply to meet the overall Core Strategy requirement"². The intention to review existing allocations was also reaffirmed in the Options Consultation Document³. That review has not been properly or effectively undertaken.

The Council therefore needs to clearly identify in the Local Plan Partial Update the total allocated capacity on which it is reliant and to provide evidence to support its deliverability in the period to 2029, together with evidence to support the deliverability of the overall committed capacity on which it is reliant through its trajectory. That evidenced review should be made available for consultation and public scrutiny through the examination process. Unless, and until, that evidenced review is provided, then the plan should not be submitted for examination since there can be no certainty that the allocated capacity is suitable, available and/or deliverable. There are significant risks in proceeding without first conducting a proper review, including the suspension of the Examination, and/or a need to re-open the Examination at a later date to consider a portfolio of additional and/or alternative sites, as has been the Council's previous experience with the Core Strategy Examination and was the recent experience in the neighbouring district of Mendip, incurring significant delays in progressing the plan towards adoption.

In the light of that evidenced review, it is likely that alternative, omission sites will be needed. Central to the Council's response to its declared climate and ecological emergencies, and which is a primary focus of the Local Plan Partial Update, is a 'priority action' to effect 'a major shift to mass transport, walking and cycling to reduce transport emissions'⁴. Critical to achieving this priority objective is to build homes in the right places to provide a 'genuine choice' of transport modes⁵, and therefore realistic opportunities for this shift to happen. This places an even sharper focus on maximising the opportunities for development at Bath, the district's principal settlement and which offers greatest choice of sustainable transport modes (including rail, bus and other modes, such as e-scooters).

¹ Local Plan Partial Update Commencement Document, April 2020, p.9, para. 11 / Local Plan Partial Update, Options Consultation Document (Regulation 18), January 2021, para. 1.7

² Local Plan Partial Update Commencement Document, April 2020, p.9, para. 13(a)

³ Local Plan Partial Update, Options Consultation Document (Regulation 18), January 2021, para. 1.9(g)

⁴ Bath and North East Somerset Climate and Ecological Emergency Action Plan, January 2021

⁵ NPPF, para. 105

In the context of the above considerations, HCC's existing Cricket Ground off Bloomfield Rise provides a highly sustainable residential development opportunity within the city of Bath. It affords an opportunity not only to provide much needed housing and affordable housing at Bath, but also to deliver wider community benefits in the very near vicinity in terms of enhancement of the quality of sports and recreational facilities on the neighbouring Odd Down Playing Fields.

The existing ground at Bloomfield Rise is not fit for purpose. Not only is the ground of substandard size for the pursuit of cricket, it also relies on the access roads for all parking associated with the facility. The nature of the ground and the evolving game of cricket, where the quality of the match components [ie bats] project the missile [ball] to ever increasing distances, is resulting in increasing conflicts with the occupiers of neighbouring residential properties due to overly compact nature of the ground. The club has installed intervention fencing around the perimeters but this is of limited effect in safeguarding the occupiers of the adjacent properties. There is a need to relocate the Cricket Club away from Bloomfield Rise to an alternative venue where there are no size constraints. The Club enjoys an exemplar reputation for the involvement of young persons in this recreational sport and there is a distinct need for a second cricket square which can be provided on the Odd Down playing fields together with training facilities and will accommodate more teams, and enhanced pavilion facilities.

The proposal is for HCC to remain within their existing locale, and as referred to, to relocate to the neighbouring Odd Down Playing Field using the proceeds of sale from their existing ground to provide the enhanced facilities that will be of benefit to the wider community. The enhanced facilities would include the provision of two full-sized cricket pitches that will accommodate the needs of a range of junior and senior teams, and to develop enhanced Pavilion facilities, including changing rooms.

HCC therefore put forward their existing Cricket Ground identified on the plan at Annex 1 to these representations as an omission site for housing, with a capacity of circa 50 dwellings.

REQUIRED CHANGES

The following changes to the consultation documents are required:

- Inclusion within the Local Plan of details of the total allocated capacity on which reliance is placed to meet the overall housing requirement in the residue of the plan period to 2029
- Production of a robust and transparent review of the suitability, availability and achievability of the allocated capacity, with a particular focus on those sites that were previously allocated but have yet to come forward, and including an evidenced trajectory for relocation of existing occupiers, where relevant
- Consider the allocation of the omission site at Hampset Cricket Club, Bloomfield Rise, Bath for residential development given its sustainable location, unsuitability for its current purposes, substantial community benefits arising from its relocation and redevelopment for housing, and demonstrated suitability / availability / achievability.

PART 2	BATH
Policies SB11-18 & SB25-26	Bath's Neighbourhoods
Pages	97-136

OBJECTION

For the reasons outlined in the foregoing objection to Policy DW1, HCC objects to the failure to allocate the omission site at the Hampset Cricket Club Ground for residential development as a new policy in the section 'Bath's Neighbourhoods' in Part 2 (Bath) of the Placemaking Plan

REQUIRED CHANGES

The following changes are required:

- Inclusion of the omission site at Hampset Cricket Club, Bloomfield Rise, Bath identified on the plan at Annex 1 to these representations as a housing development site to meet the plan's requirements in the period to 2029.



ANNEX 1

Site Location Plan



Hampset Cricket Club

Location Plan

Compiled by on 19 April 2005

Scale 1:2500

APPROVED



