

Oakhill Group Ltd
Newbridge Road, Bath

Statement of Community Engagement

March 2019



CREATRIX PR

Contents

1. Introduction	3
2. Policy	3
3. Our Approach	3
4. Public Consultation Event	4
5. Consultation Response and Feedback	Error! Bookmark not defined.
6. Website	4
7. Exhibition Feedback	4
8. Data Analysis	5
9. Key Themes	10
9.1 Use - Purpose Built Student Accommodation.....	10
9.2 Height and Design	10
9.3 Traffic and Access.....	12
9.4 Parking	13
9.5 Mixed-Use	14
10. Conclusion.....	15

1. Introduction

This statement of Community Engagement (SCE) sets out the strategy undertaken for consulting stakeholders and the local community on the proposals to redevelop land on Newbridge Road, Bath, which contains the former Hartwell car dealership.

The proposals include demolishing the existing car showroom and replacing it with a mixed use scheme comprising a combination of residential homes, a commercial retail unit and Purpose Built Student Accommodation (PBSA). The scheme will also provide new landscaping, trees and courtyards as well as a pedestrian and cycle path extending the existing Bath to Bristol cycle route.

This statement demonstrates that the applicant has undertaken appropriate pre-application discussions with relevant local stakeholders and the wider community, and actively involved them in the project development process in accordance with guidance in the National Planning Policy Framework (NPPF), legislation in the Localism Act, and Bath and North East Somerset's Neighbourhood Planning Protocol. This Statement of Community Engagement gives details of all consultation activity undertaken prior to the Planning Application being submitted.

The Applicant is committed to stakeholder engagement, consultation and communication, and to this end has ensured that local residents and the wider community were invited to give feedback on the proposals prior to a formal planning application being submitted.

2. Policy

The public consultation and engagement programme for the project was in keeping with the requirements of:

- National policy and guidance introduced in the Localism Act and the National Planning Policy framework
- Bath and North East Somerset's consultation requirements
- The spirit of thorough and meaningful consultation

3. Our Approach

From the start of this process, Oakhill Group Ltd has recognised the importance of identifying key groups and stakeholders, contacting them at an early stage in the process and trying to resolve any issues well ahead of submission of a Planning Application.

The principles adopted throughout the process of public consultation have been to:

- Engage and involve as many local residents and groups as possible
- Present the proposals clearly and honestly
- Listen and provide feedback
- Be clear about what the Applicant is able to change as part of the consultation and why
- Be clear about what the Applicant cannot change and why

Closely following national consultation protocol for planning applications, Creatrix PR undertook a consultation process on behalf of Oakhill Group Ltd.

4. Public Consultation Event

Members of the public were invited to attend a public consultation event regarding the potential development of land at Newbridge Road, Bath, currently home to a car showroom.

The event was held at Weston Methodist Church, Bath on **Tuesday 29th January 2019**. Councillors and stakeholders were invited to attend from 2pm to 3pm, and the general public from 3pm to 7pm.

A press release promoting the exhibition was issued to the local press on 18th January 2019 (see **Appendix A**). Coverage for the press release can be found in **Appendix B**.

A copy of the invitation to councillors and stakeholders can be found in **Appendix C**.

A letter inviting members of the public to the exhibition was sent to 494 addresses neighbouring the site (see **Appendix D**).

The exhibition included seven A1 boards which have been reproduced in **Appendix E**.

Approximately 75 people attended the exhibition, including two Councillors. Members of the public were given the opportunity to leave comments on the proposals via paper feedback forms or online at www.newbridgeroadbath.info. An email address was also provided for people to send feedback. A photograph of the exhibition is included in **Appendix F**. A copy of the feedback form is reproduced in **Appendix G**.

At the public consultation, Councillors and members of the public were able to ask questions and gain information about the scheme from the project team.

6. Website

The exhibition materials were uploaded onto a dedicated project website newbridgeroadbath.info on Tuesday 29th January 2019 (see **Appendix H**). A SurveyMonkey link was also included to allow people to leave their feedback online. The online mechanism for feedback remained open until Tuesday 12th February.

7. Exhibition feedback

During the course of the consultation period a total of 162 responses were received. These 162 responses consisted of 29 paper feedback forms, 107 online feedback forms, five comprehensive letter responses and 12 email responses.

However, of this total, two email responses were exact duplicates of feedback already received online through SurveyMonkey and as such, have not been entered again as separate feedback. Furthermore, another email was a comprehensive report from Bath Preservation Trust. This has been acknowledged separately to the feedback received from the general public. This can be found at **Appendix I**.

Therefore, in total, 159 responses were recorded as feedback from the community to this consultation process.

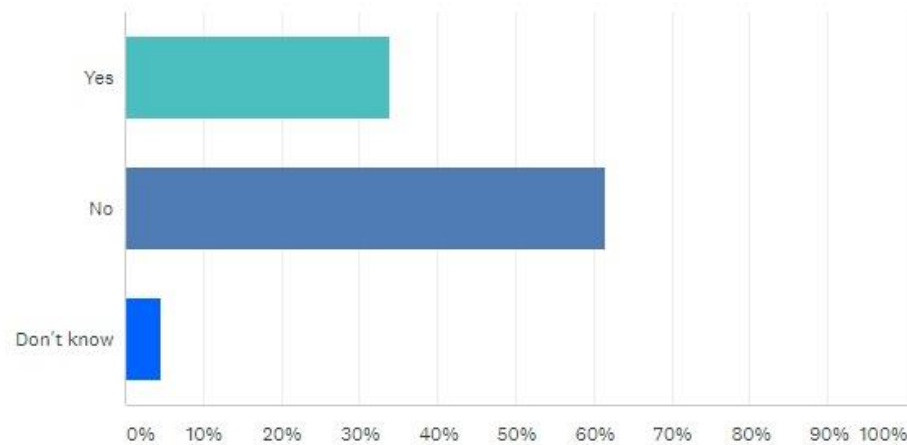
The deadline for feedback was Tuesday 12th February, and the analysis below has been completed with the data received up to this date.

Data shown below incorporates written feedback (submitted via a physical feedback form), feedback received online via SurveyMonkey and responses received via email or letter.

8. Data Analysis

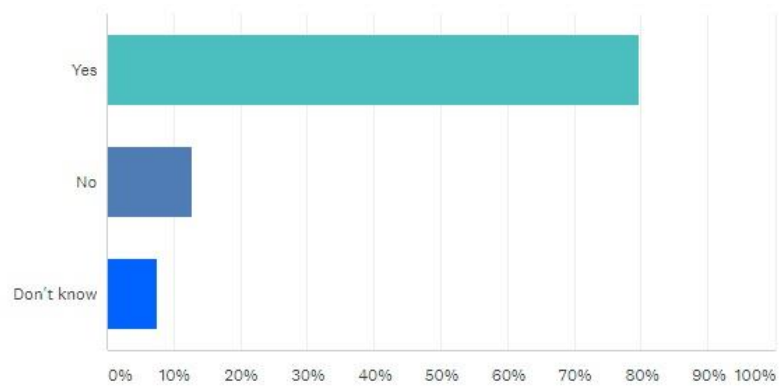
1. Do you support a mixed use development on this site?

Answered: 130 Skipped: 29



2. Do you support that Bath and North East Somerset Council should prioritise development of sustainable brownfield sites (like this one) instead of green fields surrounding Bath?

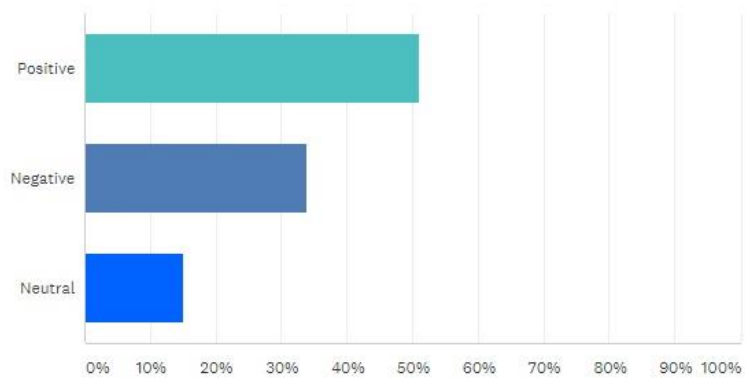
Answered: 133 Skipped: 26



3. Please indicate your thoughts on the following elements:

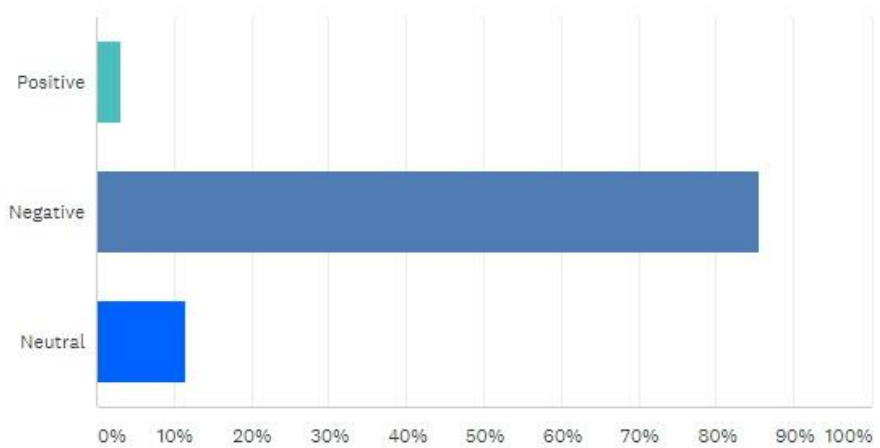
a) 105 new homes on the site.

Answered: 133 Skipped: 26



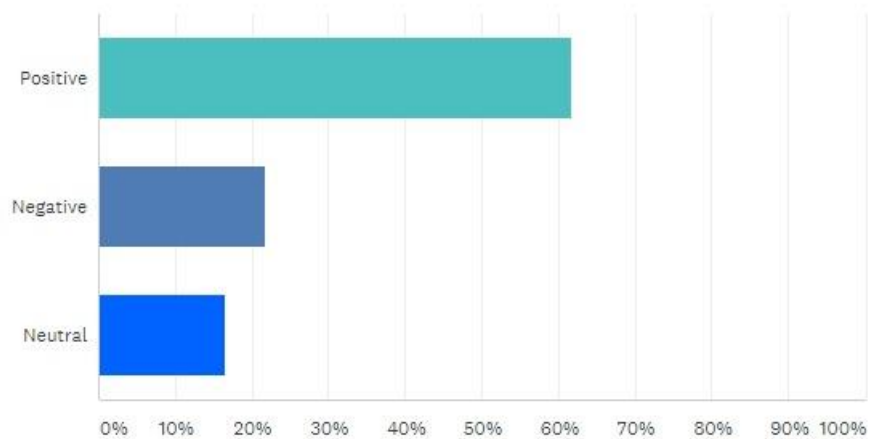
b) 186 student bed managed facility.

Answered: 131 Skipped: 28



c) Reduced income/affordable housing.

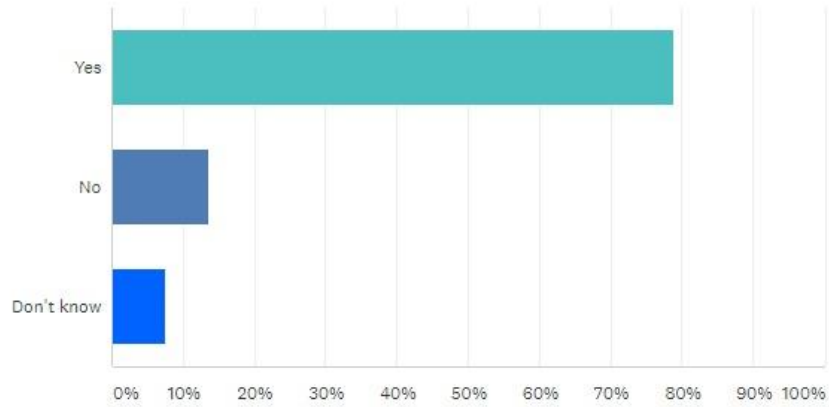
Answered: 133 Skipped: 26



4. Cycleway/footpath – referring to board 3.

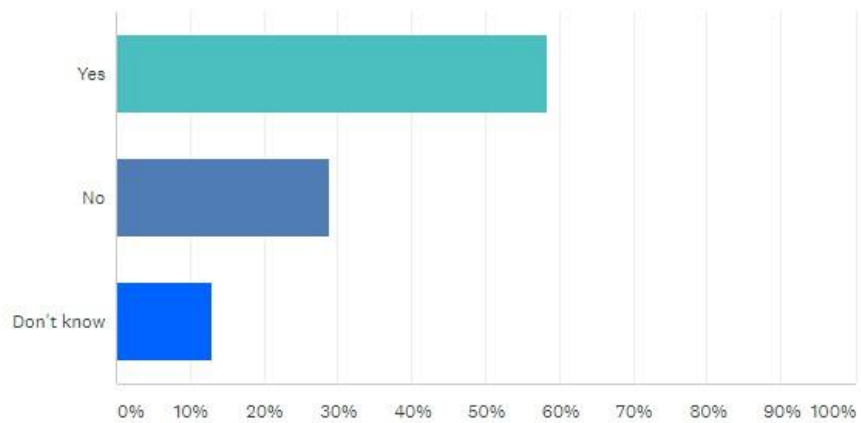
a) Are you in favour of the proposed cycleway through the site linking Brassmill Lane?

Answered: 133 Skipped: 26



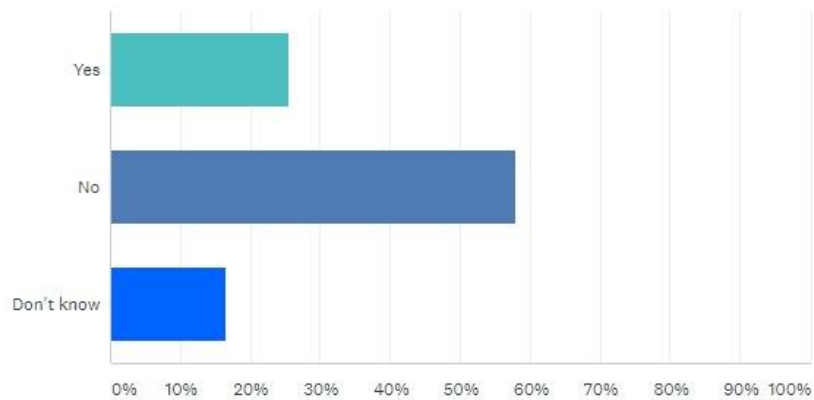
b) Would you use the cycleway?

Answered: 132 Skipped: 27



c) Would you prefer to see more parking instead of the cycleway?

Answered: 133 Skipped: 26



Q5. Referring to boards 5 and 6, what are your thoughts on the approach to building design within the context of the significant height changes across the site and the close neighbouring industrial units and concrete batching plant?

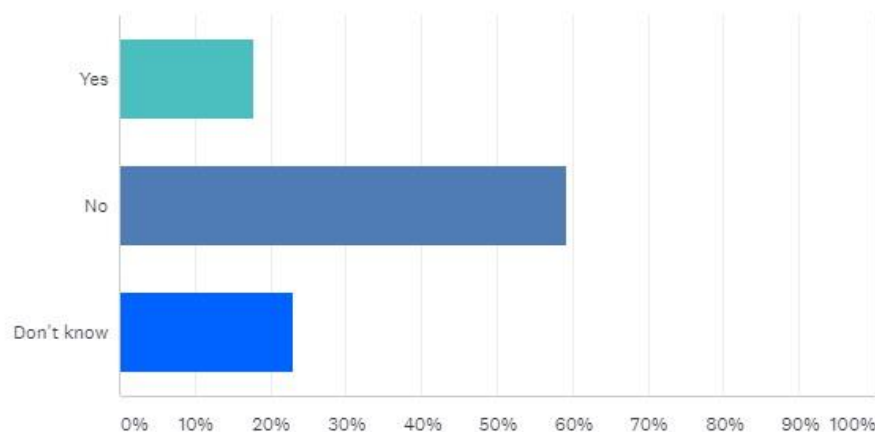
108 of the 159 respondents provided a comment to this question. Approximately 19 respondents were generally positive, whilst 80 respondents were generally negative and nine respondents were neutral.

Recurring themes included comments on the design of the scheme, the height and scale of the development, and the density of the proposals. A full list of comments reproduced verbatim is reproduced in **Appendix J**.

6. Cafe.

a) Do you think you would use the cafe?

Answered: 130 Skipped: 29

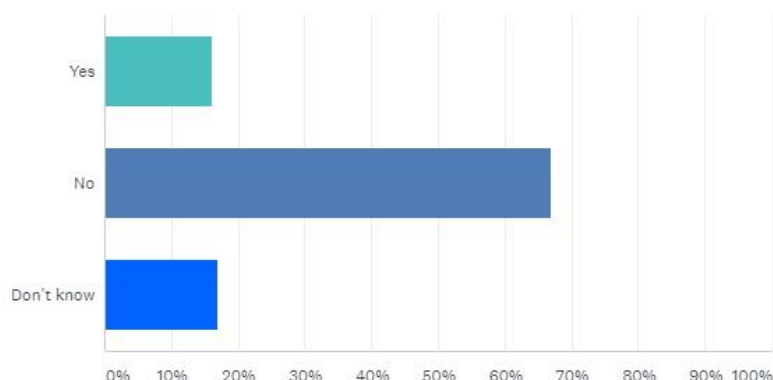


b) Is there a different retail use that you would prefer? If so, please suggest.



c) Would you prefer to see two further residential apartments instead of the proposed café?

Answered: 130 Skipped: 29



Q7. Any other comments?

145 of the 159 respondents provided a comment to this question. Approximately 3% of respondents (4) were generally positive, whilst 93% of respondents (135) were generally negative and 4% (6) had generally neutral comments.

Recurring themes from this question included concerns regarding the inclusion of PBSA, issues with access, parking and car management, height and scale of the proposed scheme, and the design not being in-keeping with the surrounding properties.

Positive comments here referred to the proposed scheme improving the look of the current site and a sympathetic solution to Bath's need for more housing.

A full list verbatim can be found in **Appendix K**.

From the comments provided in response to question seven, five key themes were highlighted. Here, of the 159 respondents, 145 provided a comment that was analysed, and as such:

- 68% of respondents (98) had concerns in relation to PBSA
- 30% of respondents (44) had concerns in relation to the height and design of the proposal
- 37% of respondents (53) had concerns in relation to traffic and access of the site and surrounding area
- 57% of respondents (82) had concerns in relation to parking in and around the proposed piece of land
- 30% of respondents (44) had concerns in relation to the mixed-use aspect of the scheme.
- Respondents did not agree with the proposed mixed-use but made suggestions of other mixed-use combinations for the site.

9. Key Themes

9.1 Use - Purpose Built Student Accommodation

PBSA is currently a high profile issue within Bath and as expected its inclusion in the proposals was a concern for some respondents. When asked for their opinion on the inclusion of PBSA in the scheme (question 3b) 85% of people responded negatively. This attitude towards PBSA was echoed in the feedback left in question seven. When asked for any other comments a recurring theme was the inclusion of PBSA (see below for sample comments).

However, at the public consultation event a few members of the public made positive remarks about its inclusion in the scheme to members of the project team.

Sample Comments:

- *“Student blocks would be okay if you can enforce no car ownership...”*
- *“There is no longer any urgent need to provide further student accommodation in the Bath urban area.”*
- *“More student accommodation is inappropriate in the City.”*
- *“There is already a huge amount of student accommodation that has been built recently in Bath. We don’t need more – and this isn’t the right place anyway.”*
- *“There is no requirement for student accommodation on this site.”*

Applicant’s Response:

No car ownership will be strictly enforced through a robust management plan which prohibits student residents from bringing a car to the city of Bath. This will be actively monitored by on site management, where ultimately students found to be in breach of their tenancy could have their tenancy terminated.

No car ownership will be encouraged by the site’s good sustainability credentials, including secure bicycle parking on site with direct access onto the new cycle path being delivered.

There is strong demand for purpose built student accommodation. Despite a number of student schemes being delivered over recent years, requirement levels remain high especially for more affordable cluster style units.

PBSA is a vital element of any healthy university city and there is widespread concern within the city that its current historic housing stock continues to be converted into HMOs and particularly student HMOs due to a lack of other alternatives. Young people are vital to the economic health and future of the city and it is essential that there is provision of adequate housing for young adults both in the form of PBSA and residential accommodation suitable for rent. Whilst affordability is an issue for many inhabitants in the city young people continue to be hardest hit by recent rising house prices. We believe that new PBSA as a subsidiary element of a larger residential scheme helps to address this issue.

This site is an existing brown field industrial site on a major planned active travel corridor that directly connects to both universities, the city centre and the planned new art and design campus – and therefore is ideally suited for a PBSA development. There is currently very little PBSA in Newbridge itself and therefore we do not believe that there is an overprovision of PBSA's in the Newbridge district.

The Council has confirmed provision of student accommodation on this site is acceptable provided it does not prejudice the delivery of 80-100 dwellings. The proposal will deliver approximately 100 residential units on a highly sustainable site, therefore it is acceptable in planning policy terms. The Council have confirmed this approach.

9.2 Height and Design

When asked in question five for comments in relation to the design and height, 18% of respondents were generally positive about the proposals and approximately 74% of respondents offered generally negative feedback. Some of the concerns raised were in relation to the height of the scheme in comparison to existing properties. Density of the development was also raised as a concern. Respondents repeated their concerns about the height and design in comments left under question seven. The sample comments below are taken verbatim from both question five and seven of the feedback given.

Sample Comments:

- *“These are potentially significantly sized buildings to the local area and will be very imposing to the existing houses and residents.”*
- *“The four/five storey student blocks in particular are too large and too dense in nature – and these buildings will dominate over the houses nearby.”*
- *From the mock ups it looks to be very in keeping with the local area and is a huge improvement on the present site!”*
- *“All good. sympathetic to the current Newbridge Rd elevations.”*
- *“In general I think the plans look good – better than before.”*

Applicant's Response:

The scheme has been carefully designed so that it does not detrimentally affect views across the city and a Landscape and Visual Impact Assessment (LVIA) has been prepared prior to planning submission to demonstrate that the buildings have been designed to an appropriate scale in keeping with the diverse local context, which includes Victorian, Edwardian and 20th century architectural styles. This rich variety will inform the future design and appearance of the buildings which will be a reserved matter to allow opportunities for further stakeholder engagement.

The LVIA also provides a series of detailed CGI images from a number of short-distance and long-distance views demonstrating how the development will sit in the context of its neighbours and how it will relate to its surroundings.

The change in elevation to the quarry floor – excavated from the hillside – presents an opportunity to provide buildings which are up to 5 storeys in height but which are not taller than their surroundings when viewed from Newbridge Road. The two blocks of student accommodation are of a similar height to the residential terrace, which fronts Newbridge Road, as a result in the change in ground levels across the site.

9.3 Traffic and Access

A number of respondents raised concerns about the impact the new development might have on traffic and local roads.

Sample Comments:

- *“Can you please explain why the entrance to the site is planned to be beside the bend on Newbridge road rather than its current location? This was a key criticism of the 2014 scheme.”*
- *“The additional traffic generated by the residential development and compounded by the inevitable student car owners/visitors and the necessary additional public transport, taxis, service & utility vehicles will exacerbate airborne pollution on Newbridge Road.”*
- *“Still access and exit on dangerous corner of Newbridge Road. Also access to car park opposite bus stop may cause problems.”*
- *“Problems to be addressed: - Safety of proposed access junction to the car park = cars turning right off Newbridge Road are crossing a blind corner where cars typically go 40mph (whatever the speed limit says).”*
- *“The proposed scheme is too dense and will add too much traffic.”*

Applicant’s Response:

The access junction will be located on the outside of a bend to maximise visibility; other considerations at this location have been the proximity to the pedestrian crossing, the bus stop and the Charmouth Road junction, which limit the available space for a safe and suitable vehicular access. Traffic surveys showed that 85% of traffic was travelling at or below 30mph on this stretch of road and therefore visibility splays of at least 2.4m x 43m to the east and 2.4m x 42m to the west will be required at this location, based on the observed 85th percentile speeds, calculated with Manual for Streets standards. This level of visibility will be achievable from the access junction within the site and highway land.

A comparison of existing garage flows and proposed traffic indicates that the residential scheme will produce around one additional vehicular movements every six minutes compared to the garage during both peak hours. Traffic flows through a 12-hour period will be similar; this is based on 2014 traffic surveys when the garage was operating at its full capacity.

A review of five years of injury accident data from the Road Safety Team and BANES demonstrated that only one injury accident occurred outside the development site, over the last five years. This resulted from a driver failing to stop on a red signal at the pedestrian

crossing, colliding with a woman and child who both received slight injuries. Defective eyesight was listed as one of the causation factors. No injury accidents occurred at the nearby Rosslyn Road junction, a location that was perceived by a number of consultation attendees as being dangerous. The accidents appear on the whole, based on the information in the output report, to be due to driver error, particularly failure to look properly when turning. Newbridge Road is an A-road with heavy traffic flows and as a result, some level of accident record is to be expected, although it is noted that accident numbers have reduced compared to the previous assessment of five years.

9.4 Parking

The response from question seven showed that 57% of respondents had concerns in relation to parking, with a number querying whether the provision on the site would be enough. Other respondents felt that parking was already an issue in Newbridge.

Sample Comments:

- *“Parking is already a problem as the workers from the nearby hospital park here”*
- *“Car parking in Newbridge is at saturation, due to school runs, hospital parking, and the fact that many properties do not have off-road parking”*
- *“The parking in surrounding roads including Newbridge Road is already extremely problematic as the area is used by hospital staff and commuters/shoppers who do not want to pay to park in town.”*
- *“There are obviously not enough parking facilities on your site to accommodate the number of potential residents.”*
- *“A development like this would have a gigantic knock on affect with parking as there isn’t space for 105 cars on the site you are looking to build on.”*

Applicant’s Response:

Parking provision will allow one parking space for every residential apartment. Parking standards set out in Appendix B of the 2017 BANES Parking Strategy indicate a minimum requirement of one parking space per one-bed properties and two parking spaces per two-bed dwelling. However, there is scope for this to be reduced based on accessibility levels. This site has a moderate accessibility rating based on the calculator from Appendix C of the Parking Strategy, which will allow a discount of 10-25% in parking numbers.

Census data from 2011 has also been reviewed. This indicates that overall in the BANES district, 49% of households in flats/apartments do not have a car, with 42% having one car and just 9% having more than one. Locally to the site, within the BANES 008 middle layer super output area, 36% of households in private rented accommodation do not have a car, with 41% having one car. This indicates that locally, for rented properties or for flats, demand for parking is likely to be lower than for owner occupied properties and therefore the proposed provision is expected to be suitable to meet demand. Based on 100 residential units, it is expected that the site might result in ownership of between 60 cars (based on flat/apartment Census data) and 87 cars (based on rented Census data); the proposed provision of 100 residential spaces plus visitor parking is therefore appropriate and

approximately commensurate with local standards permitting a 25% reduction and will allow some spaces for variation in these figures without overspill onto surrounding streets

No parking will be provided for students, in line with local parking standards. Students will sign up to tenancy agreements which prevents them from bringing their vehicle to the city. This will be set out in the Section 106 agreement for the site. Students will not be permitted to keep a motor vehicle within 3km of the site, unless they are eligible to use the disabled parking bays, and this will be set out in their tenancy agreements and highlighted in welcome packs and during any induction events. A disciplinary process will be set out in tenancy agreements and student information packs for students who do park in surrounding streets. This is likely to include verbal warnings followed by written warnings in the first instances, potentially financial fines, legal proceedings and even loss of tenancy for students who do not comply with the terms of their tenancy including in relation to parking in surrounding roads.

9.5 Mixed-Use

A number of respondents had concerns in relation to the mixed-use aspect of the scheme, indicating the proposals would not be in-keeping with the current nature of Newbridge. Some respondents offered different suggestions of other mixed-use combinations for the site.

Sample Comments:

- *“How about developing a leisure quarter instead of more student housing? Something for the local community to access? Gym, swimming pool, community rooms for meetings/adult learning/social groups etc.”*
- *“I would prefer more residential homes and more parking on site”*
- *“We need more high quality office space in Bath (not student accommodation)”*
- *“I’d like to see this be an entirely green site – no cars, but lots of space and facilities for bicycles.”*
- *“Newbridge needs a car repair/sales firm in the area.”*

Applicant’s Response:

The site has an allocation in the current Local Plan for the demolition of the existing buildings, redevelopment of the site, and provision of 80-100 new homes. The Council’s policy ambition for the site is being taken forward into their emerging draft Local Plan which doesn’t propose to change the current policy. Part of this ambition is also to ensure the delivery of the pedestrian and cycle sustainable transport route.

It is a constrained site with challenging topography which, along with the need to provide approximately 100 new homes and deliver the sustainable transport route, informs the nature of the redevelopment of the site, the amount the site is to deliver, and where this will be located.

The site’s sustainability credentials allow for alternatives to private car ownership to be considered, whilst at the same time providing a level of vehicle parking on site which is policy compliant. However, it will feel like a pedestrian-friendly and cyclist-friendly ‘green’ site at

the lower level, particularly along the new sustainable transport route within the former railway cutting.

The various site constraints also have a significant effect on viability and the introduction of student accommodation alongside the residential units produces a scheme which is viable and can be brought forward.

10. Conclusion

It is clear from the data presented in this report that there is support for prioritising the redevelopment of brownfield sites, with 80% of respondents agreeing.

Concerns were raised about height and density as well as the inclusion of PBSA.

However, there was support for the creation of 100 new homes on the site, with 51% of respondents agreeing that this is a good element to the scheme, and there was also support for the inclusion of affordable housing, with 62% of respondents supporting reduced income and affordable housing.

It is important to highlight that less than a third of people invited to attend the public consultation event provided a response to the proposed scheme, indicating a potential neutrality amongst other local residents and members of the community. Of the 494 letters sent out to local residents, 75 people attended the event, with a turnout rate of 15%.

It is clear that there is support for the redevelopment of this brownfield site instead of green fields in Bath and the surrounding area for a mixed use purpose. The applicant has noted any concerns raised throughout the process and tried to respond to them in the initial stages of community consultation.

This document demonstrates Oakhill Group Ltd's commitment to community consultation, going above and beyond the requirements set out by local and national government, engaging directly with residents' groups and the community to involve them in the evolution of the submitted plans.

***Prepared by
Creatrix PR
March 2019***