

Planning Services
Bath and North East Somerset Council
Lewis House
Manvers Street
Bath
BA1 1JG

By email

development_management@bathnes.gov.uk
let.005.NS.JF.27350021

5 July 2019

Dear Sir / Madam,

**FURTHER REPRESENTATIONS TO APPLICATION REF: 19/01854/OUT
HARTWELLS OF BATH, NEWBRIDGE ROAD, NEWBRIDGE, BATH, BA1 2PP**

We write on behalf of Standard Life Assurance Limited in relation to the above application and further to our previous representations submitted on 14 June 2019.

Since the submission of our earlier representations, we have noted the various consultation comments received and Walsingham Planning's response to some of them on behalf of the applicant, dated 12 June 2019.

Whilst the applicant's response discusses a number of issues raised in our initial representations, their letter predates our comments and they have not directly addressed all of our concerns. This letter therefore seeks to expand on the points raised previously and also highlight further issues which we consider the applicant needs to address prior to the Council determining the application.

The issues discussed in this letter relate to parking, the management of The Maltings access and amenity.

Parking

The applicant now proposes that if a parking space is required by a resident, a permit will be allocated to them for a specific space. Whilst this partially addresses the issue raised previously regarding additional highway movements created from residents not being able to find a space, it does not address the fact that there is an under-provision of car parking. The proposal is not in accordance with the adopted minimum standards and it would result in significant overspill parking in the local area. We therefore request that the proposed quantum of development is reduced in order to lessen the need for parking and, in turn, avoid overspill parking issues in the surrounding area.

Management of The Maltings access

We note that the applicant has submitted a swept path analysis that confirms that a large refuse vehicle and a rigid delivery lorry can turn within the car park accessed

via The Maltings. This demonstrates that vehicles will not have to turn within The Maltings industrial estate and partially addresses a concern we raised previously regarding vehicle movements associated with the proposal conflicting with the operations of The Maltings. However, the applicant has not yet addressed our comments regarding the potential trip generation associated with delivery vehicles accessing the development. Our concern remains regarding the intensification of the use of the access to The Maltings and we request that this is fully assessed to ensure that there will be no detrimental impact on the operations of the industrial estate.

Furthermore, the applicant has not yet addressed our concerns regarding the current security arrangements and the need for locked access gates at both the entrance to The Maltings and the rear entrance to the Hartwells site. The gate between the application site and The Maltings industrial estate has been kept locked for security reasons and it will continue to be necessary that it remains locked when vehicles are not passing through. The most appropriate way to achieve this would be by the installation of an electronic fob-operated gate system, which would need to be put in place and maintained by the applicant. Similarly, the gate from Brassmill Lane into The Maltings industrial estate is locked at night. We therefore require that a solution is provided that maintains this level of security.

In addition to security reasons, there are also clear health and safety grounds for such a gate to exist, because immediately beyond the rear entrance is a cycle path / pedestrian walkway. The installation of a locked gate would help to manage potential conflict between vehicles, and pedestrians and cyclists. It would prevent vehicles from crossing the walkway at high speeds as they would be required to slow down and stop in order for the gate to be unlocked. As such, it would help ensure the safety of users of the walkway, that would otherwise be vulnerable to uncontrolled vehicular movements.

Amenity

We previously raised the following issues in relation to amenity:

- The applicant should provide appropriate mitigation measures to protect the residential amenity of future occupants of the scheme;
- The applicant's assumptions that noises from industrial activities are heard only during the day are unfounded; and
- The Noise Assessment submitted with the application uses data that is outdated and therefore invalid.

We are not aware of any of the above issues being addressed and therefore our concerns still stand. We consider that these matters need to be resolved accordingly before the application could be supported by officers, in order to ensure satisfactory amenity for future occupants of the scheme.

Conclusion

In summary, these comments seek to highlight that there are still a number of outstanding issues that have not been addressed by the applicant. We therefore

request that that our comments are taken into account and that the scheme is revised accordingly. Furthermore, we ask that our requirements with regard to a fob-controlled gate at The Maltings, and a solution to maintain the security of the industrial estate at the entrance from Brassmill Lane, are incorporated into the scheme and properly maintained thereafter. This will help ensure acceptable security and safety for tenants of The Maltings, for future occupants of the proposed scheme and for pedestrians and cyclists using the sustainable transport route.

Please notify us of any relevant consultation responses that are received during the remainder of the determination period. If you are minded to approve the application, or if it will be determined at committee, please let us know. If you have any queries, please do not hesitate to contact us.

Yours sincerely,



Louise Bending

cc: Mr A Roberts – Aberdeen Standard Investments