

Additional statement SB 24 Sion Hill

Lansdown Crescent Association represents 188 members in the area adjacent to the site allocation, 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.

We find that whilst this site allocation may have a positive intention it is not currently effective, it may lead to detrimental impacts which are not consistent with the Council's Liveable Neighbourhood policies, the core strategy policy D3, LTN120 compliance or the Council's own Climate Emergency commitments to become Carbon neutral by 2030. This could lead to damaging impacts on a historically sensitive residential neighbourhood and a UNESCO inscribed World heritage area, Lansdown Crescent, (inscribed for both authentic Georgian architecture and pastoral setting)

The updated plan if left unchanged 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. **BNES core strategy Policy D3 m: "Be designed in a way that does not adversely prejudice existing /future development or compromise adjoining sites ."** requires the Local Plan to consider the entire area a site allocation sits within.

We have proposed additional insertion or deletion of text or and a diagram change . These are summarised and highlighted red:

SB 24 Sion Hill - Site allocation

1. Clause 9 amended to delete specific reference to Winifred's Lane

Listing improvements to Winifred's Lane in isolation prejudices a neighbourhood wide traffic planning approach which needs to be consistent with the Council's Liveable Neighbourhood Policies. Therefore we seek to remove the following from **clause 9: "along Winifred's Lane"**

Reason: **BNES' Liveable Neighbourhoods Policy , page 5, paragraph 2 "The aim is to reduce overall traffic numbers rather than pushing traffic elsewhere"**

The reference to traffic changes outside the site boundary which reference Winifred's Lane should not be detailed in the plan, any future changes to the roads should be area wide and seek to improve the whole area and recognise that pedestrian and cycling provision is being suggested within the site boundary.

2. Diagram no 26 to be amended/corrected :

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.

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.

We therefore accept the Council's errata schedule to correct the misleading orange arrow and show the correct direction of travel .

We 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 reopening of the historic South/North pathway through the site re-created by moving

the Telecoms box at the Southern boundary and reinstating a pedestrian opening at this point on Sion Hill. (this historic gateway is still present behind the Telecoms box). These are of real gain to our community and allow for cycle routes linking the south to north of the site at safe gradients within the site. Government guidance on cycle provision would exclude Winifred's Lane from being considered as a safe cycle route. **LTN 120** provides guidance to avoid cycle routes on gradients over 5% within residential routes of 20mph speed limit, and rules out cycle infrastructure on gradients over 10%. Winifred's Lane has a gradient of 16% at the lower end and is certainly not safe for children to use as a cycle route. Permeability through the site is therefore a requirement of **BNES' Core strategy Policy D3: Urban Fabric b: "Be permeable, by offering a choice of routes through a site, and connecting with the existing route networks in and through adjoining areas."**

3. **Historic sensitivity/UNESCO 220g**: 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 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 and of particular historic importance Lansdown Crescent is listed in the UNESCO World Heritage citation for Bath and protected by a width restriction TRO of 6'6" "
4. **220h**: 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.
5. **220j**: Please add that any redevelopment proposal will ensure the protection and enhancement of the site's **"and neighbouring Heritage areas' UNESCO significance"**, sensitive landscape setting and ecological interests

Policy SB24 Sion Hill Development requirements and Design Principles

6. **Point 1. The increase from 60 to 100 dwellings and traffic impacts.**
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.

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 with Journey to Net Zero. We require a more ambitious environmental target for the site and limits to car allocation per dwelling.

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).