

## **BFA objection to planning application 20/01591/FUL**

Extension to 138 Wells Road and 2-6 Wellsway, to create 28 units of purpose-built student accommodation and ancillary works.

### **1 Loss of flats in favour of student accommodation**

We object to the loss of six flats. The priority for any residential scheme within the city, whether by conversion or new build, should be for housing local people for which the need is well established. Policy H5 of the Local Plan addresses the retention of existing housing stock, so a case would need to be made for losing the existing flats.

As the applicants concede in their Planning Statement, the SPD and policy H2 indicate that planning permission should be refused due to the potential harm caused to the mix and balance of the local community.

Student accommodation does not meet a pressing need. Indeed, there must now be some question over the number of foreign students likely in the future. Policy B5 of the Local Plan – Strategic Policies for Bath’s Universities – and the supporting text indicate that “development on campus should contribute to the full spectrum of the Universities’ needs ... all the accommodation space that is needed for growth.” The supporting evidence for the current application should set out why this proposed new student accommodation could not be provided either on or adjacent to the university sites. Moreover, the Council are reviewing student housing policies: there is a case for declining yet more student provision off campus until the update of the Local Plan is complete. We support FoBRA’s suggestions for tightening these policies.

### **2 Student accommodation: suitability of a Bear Flat location**

Bear Flat does not seem a good location for student accommodation.

The submitted evidence for the application suggests that students would face a bus journey of at least half an hour to either Newton St Loe or Claverton Down university sites. Cycling would just about be feasible, but the hill on the return journey would be discouraging. Walking would probably be too far for most students on a regular basis. Thus, the propensity to drive would be high.

The proposals for negligible private car use and maximum use of sustainable transport are fine in words, but unconvincing in practical terms. If this development went ahead on the basis that no car parking provision was made, a strict travel plan would need to be imposed, and closely managed by the Council.

The highways document states that a Comprehensive Student Management Plan could be required, through a planning condition. The effectiveness of the management plan and travel plan would be enhanced if monitoring student transport arrangements was handled by the warden. However, additional information as to the role and responsibilities of such a warden and for how long the post would be sustained would be helpful. Would the warden be an employee of one of the Universities?

### 3 Impact on nearby residents

Replacing 6 flats with 27 units seems likely to have an increased impact on the amenity of existing neighbours. How far the development would have an effect on the living conditions of in nearby parts of Bloomfield Avenue, Hayesfield Park, Wells Road and Wellsway needs to be carefully assessed. Noise, disturbance and privacy would appear to be issues, and problems might be greater in the evening and at night.

There is also the potential for adverse impact on The Bear Hotel (hotel accommodation as well as pub/restaurant) just to the south and Menu Gordon Jones (a Michelin-rated restaurant that draws people to Bath) within the block.

It would help if the Student Management Plan included strict rules on noise levels (daytime and night time), but there would need to be reassurance about how this would be enforced.

### 4 Urban design

The principal impact on the World Heritage City is on the view coming down Wellsway - from the Devonshire PH to the Bloomfield Road junction - of the wooded hills beyond, the setting of Bath that is one of the criteria that led to WHS designation. This view is identified in the draft Bear Flat and Oldfield Park Character Appraisal (published 2020). The extent to which this view would be reduced by the extensive fourth storey should be assessed as part of the submission. The view is not analysed in the Design and Access Statement.

Whether the scheme more immediately is positive or negative to the character of this part of the conservation area is debatable. The application site already comprises a building block significantly larger than that on either side, so adding a storey could be said to make the block unduly prominent and out of scale with its setting. On the other hand, the low building frontage on Wells Road is weak and detracts from the scene so the scheme could be said to improve this aspect.