

## Bath Preservation Trust update on the Rec

July 2019

Bath Rugby recently filed a scoping application for the Environmental Impact Assessment which they will be required to submit with their substantive planning application.

This suggests that they are on track to submit a planning application in the foreseeable future. The purpose of this scoping application, which doesn't seek consultation comments, is to determine in advance what environmental factors the Stadium for Bath will be required by the Local Planning Authority to take into account in their planning application. It is an interesting read and proposes many areas to be assessed where there have been the local concerns e.g. traffic, flooding, climate change, heritage impact, views etc. The full application can be seen here.

<https://bit.ly/2LO5A9a>

The comprehensive scope demonstrates that there will be a lot of data to analyse when there is a full planning application; BPT has approached the scheme's planning officer at the Local Planning Authority to ask whether there is going to be a longer consultation period.

Although there have been no public images since the last consultation, our understanding from stakeholder meetings is that the design has changed since the last public consultation and we await any new proposal being put forward by Bath Rugby. This reinforces the Trust's point of view that it is premature to take a firm positions on the design of the previous consultation until we know whether this is going to be part of the application design. In the absence of other publicly available information, we would reiterate our previously stated position, which can be summarised as "Rugby on the Rec, but not 'at any price'".

BPT have accepted:

- The principle of Bath Rugby having a stadium on the Rec, including any associated legal arguments;
- The possibility that a stadium might take up more space (in all dimensions) given the known desire to increase capacity
- The possibility that it might involve some loss of some of the currently panoramic view of the hills to Bathwick.

We have NOT agreed, and are currently concerned about:

- The absolute height and massing of the publicly presented concept design which seems excessive if the primary objective is to achieve a 25% increase in spectator capacity and better player facilities;
- The apparent extent of loss of views to Bathwick, consequent on the nature and size of the current concept design;

- The principle that to avoid flood events the pitch needs lifting by c4.5m. We have not seen data from the Environment Agency supporting a flood risk resulting in the need to lift the pitch by this amount;
- Viewpoints to Prior Park from Laura Place;
- Elements of the previously presented architectural treatment, especially the 'Rec facing' elevation, the North West corner and some of the materials.

We have noted that:

- *If* Bath Rugby are required to raise the pitch by c4m to take it out of the flood plain, it creates a void currently suggested for a car park;
- We are not 'pro' or 'anti' car parks on principle, though we would prefer that public transport and then 'eco-cars' were more incentivised and we have supported initiatives to remove cars from the historic core;
- We assume that at least some of this car parking capacity is displaced from significant reductions at Avon Street and potentially Manvers Street in the future. We do not have data to argue whether this redirection of car movements to a car park in that location would help or hinder city centre pollution and congestion.

We also note that Bath Rugby have been consultative and open in their approach to Bath Preservation Trust and that BPT has participated in several stakeholder meetings alongside Historic England and specialist Local Authority officers since the last public consultation.