

New Stadium for Bath Rugby

Updated position - January 2019

PERA's position on a new stadium at the Rec has been clear for several years. While PERA is not opposed to improvements or redevelopment of the current Stadium, PERA is opposed to changes that will cause local residents to suffer further noise, nuisance or pollution.

We have welcomed Bath Rugby's consultation on the New Stadium. Both PERA committee members and interested local residents have participated in the workshops held in 2017 and 2018. Now that Bath Rugby has released updated plans and PERA members have had a chance to view and comment on them, it is clear that the designs have included few, if any, of PERA's considered representations and that the plans in their current form are unacceptable to PERA members.

PERA's general concerns are set out below. This list is not comprehensive but we believe it captures the key issues and represents the views of the vast majority of our members.

Principal issues

- **Size.** The size of the New Stadium is now apparent from the plans released in December. The pitch will be raised by 4m to accommodate a new 700 space car park. As a result, the height of the New Stadium will be **DOUBLE** the height of the current stadium. Instead of nestling alongside its historic neighbourhood, the resultant structure will dominate the surrounding area, blocking historic views of Claverton Down and Bathwick Fields.
- **Residential area.** Unlike the west and south-sides of the proposed Stadium, the north-side of the Stadium (and to a lesser extent the east side) is a residential area that closely borders the Rec. In addition to the problems caused directly by the sheer size of the New Stadium, such as loss of views and the adverse impact on light and amenity particularly for residents living adjacent to the Rec, we have made known to Bath Rugby our very significant concerns about potential noise pollution, light pollution, vehicle pollution and congestion, flood risk, and nuisance caused by general stadium usage. Unfortunately, the latest proposals do not provide enough information to allay these concerns and we will continue to press Bath Rugby for more detailed information on how they will be addressed.
- **Temporary stadium at the Rec.** During development of the New Stadium, Bath Rugby's preferred option is to build a temporary stadium at the Rec. The disruption to local residents and the loss of amenity to the wider community from having a temporary stadium sited immediately adjacent to what will be a vast building site for almost two years, and longer if there are delays to the build of the New Stadium, will be significant and is unacceptable to PERA's members.

The remainder of this documents looks at the issues presented by the proposed development of the New Stadium in more detail.

Size and footprint issues

- **Footprint.** The Stadium footprint should not be increased unless it can be shown that it would not degrade the utility of the area. In particular, the New Stadium design indicates a significant expansion to the east, cutting across a large portion of the Rec that is currently used by the local community for many different activities. The current proposal has ignored these concerns, substantially increasing its footprint to increase the commercial and revenue generating activities of the owners.

- **Height and visual impact.** The proposed height of the New Stadium is close to the parapet height of Johnstone St and Great Pulteney St. This is far too high, will permanently interrupt identified historic and protected views, and will result in the New Stadium dominating the historic setting of the Rec. Generally, the design has given too little thought to the visual impact of the New Stadium, in particular the East Stand where, to date, only a low, temporary stand has been allowed. Bath Rugby also needs to address specifically how the New Stadium will affect neighbouring residents' rights to light and privacy.
- **Temporary stadium.** The siting of a temporary stadium for Bath Rugby alongside the building site for the New Stadium is strongly opposed by PERA and its members. Siting a temporary stadium on the Rec would, at a minimum, result in a total loss of green space, a complete loss of amenity for the wider community, and excessive noise and visual intrusion. A temporary stadium is likely to be in place for 2 seasons thereby displacing ALL current social and charitable activities for at least that length of time. Those activities will have to move to a new location where they are likely to become established. The Rec Trust is likely to expand the number of sites where it operates, and it will have significantly more financial resources to do so if it grants this consent. With no charitable activities taking place on the Rec for at least two years, it could be sold off by the Trust, with planning consents that maximise its value. As the majority of the Rec will house the New Stadium, the rest could be used for say student accommodation or other commercial activities. We think it is important to retain the maximum amount of green space in such an iconic and historic location for outdoor amateur sports in the centre of Bath.

Access issues

- **Traffic access.** Traffic to/from the New Stadium should only ever come via Pulteney Road/North Parade, never via William Street. During construction, ONLY south-side access should be used. The incorporation of a 700 space short term car park into the plan is a major concern. The extra daily traffic this will create (possibly 4,000 extra car movements per day) will significantly add to pollution and congestion in the PERA area, and is expressly contrary to BANES's stated traffic management and air quality objectives (see below for more detail).
- **Pedestrian access.** Primary pedestrian access points and entrances to the New Stadium should be on the Riverside, North Parade and the south-side via the Leisure Centre. Stadium entry via the William Street entrance should be only for Emergency access. In particular, there should never be any access via Johnston Street. The new plans do not address this issue.
- **Rights of way.** At present, pedestrians can access the Riverside and the Leisure Centre via the Rec. This access should continue following development of a New Stadium. We await clarification from the developer and land owner on this point.

Nuisance issues

- **General.** The New Stadium should not adversely affect neighbours' quiet enjoyment of their homes and it should not create noise, light or other pollution (e.g., food smells) for local residents. This is particularly important on the north-side of the Stadium which is lower and immediately borders a residential area. The current plans do not address this issue properly and we remain committed to supporting those residents most affected by the proposed New Stadium to ensure that they are not affected by nuisance.
- **Outside events.** Outside of regular Bath Rugby matches, there should be a very low limit on the number of events allowed at the New Stadium/the Rec. Any events that are permitted should have a cut-off of no later than 11pm on Fridays and Saturdays, and no

later than 10 pm on other nights. Everyone should be offsite by then. The William Street Entrance should not be used for these events and there should continue to be something that prevents permeation into the residential area after these times, and dusk-to-dawn, as currently exists. We have asked Bath Rugby to give appropriate and binding assurances that local residents can rely on in relation to this issue but, to date, the club has declined to agree to this request.

- **Commercial facilities.** Commercial facilities along the river-front need more discussion on usage, hours and types of facility, particularly those that serve alcohol. Issues of noise, security, safety, ASB, prevention of excessive drinking, are all issues that are of major importance to local residents, who are the most likely to be adversely affected. We are still awaiting assurances on this issue.

Traffic and wider environmental issues

- **Car park - traffic.** PERA has major concerns about the proposed underground car park. It will have a detrimental impact on an already congested City, particularly along approach roads. Encouraging additional traffic into Bath is directly at odds with BANES's stated aims to reduce traffic and encourage other means of transport to/from the City. The fact that it has a detrimental impact on the overall height of the New Stadium is also a major issue.
- **Car park - air quality.** The proposed car park will also exacerbate air-quality issues which BANES and the UK Government have committed to reduce. For example, it has not been explained how use of the proposed car park would avoid legal air quality limits being exceeded on main roads in Bathwick and Widcombe. Publicly available data shows certain traffic-related pollutants are already close to the legal limits on these roads. PERA objects to the inclusion of a car park at the Rec, but should one be built any ventilation of the car park should discharge extracted air to the south-side of the Rec.
- **Flood mitigation.** Flood protection for adjoining residential properties should be increased to give them at least the same level of flood risk as that planned for the pitch. We are still awaiting data from the developer on this issue.
- **Environmental protections.** Consideration must be given to the impact on, and protection of, bats and other wildlife as a result of the proposals (both during construction and following construction of a New Stadium). We await data from the developer on this issue.

Process and protections

- **Representation.** PERA and those residents who most closely border the Rec should be represented on the Stadium "Resident Group". Further, residents most local to the Rec should be consulted separately as they are the people most directly affected by the New Stadium proposals.
- **Safeguarding protections into the future.** The ultimate ownership and control of the New Stadium may change from time to time, and any new owner or controller may wish to use the New Stadium in ways that are incompatible with protections to be afforded to local residents. Protections afforded to local residents and the wider community in connection with the construction and use of a New Stadium must therefore be robust and capable of enforcement by residents in the future. Ownership of shares, debt, financing structure, and transferability of any of these are therefore important to local residents and should be known in advance.