

Entry Hill Community Association

Principles for maximising the local community value of the Bath Bike Park development

APRIL 2021

ENTRY HILL COMMUNITY ASSOCIATION

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Introduction

The development of the Entry Hill Golf Course site presents an opportunity to create a valued community asset that respects the quality of life for residents. With careful planning and implementation, this can be achieved. It is important that the final design and ongoing operation of the site delivers clear benefit to the local community. Key to this is an open consultation process, that involves a range of stakeholders and is committed to listening to a range of viewpoints.

Entry Hill Community Association has been in contact with all the residents in our area, and with other homes bordering the site. Our knowledge of the current Bath Bike Park proposal and the feedback we have received from residents has informed the set of principles we set out in this paper. This is the product of detailed consideration and discussion by people who know the site well. It builds upon this wealth of local knowledge to explain how the community value of the site can be maximised; and negative impacts minimised.

Early on in our work, we drew up a set of 'red lines' which we thought were the very minimum set of principles that any development should adhere to. These formed the basis for the longer and more detailed set of principles set out in this paper. As we worked to better understand what they would mean to us in practice, we've changed them slightly, but we think they still give a good sense of what we think really matters, so we are setting them out again here.

These principles work in parallel to planning policies, which the proposed development will need to meet, because of the amount of construction involved in creating the trails and siting and installing new buildings and facilities. This will need to be assessed through a full planning application. There are a wide range of Local Plan policies which will need to be considered as part of this process, not least because the site is within the boundaries of a Conservation Area and a World Heritage Site.

Red lines for the Entry Hill site

- **Supporting Entry Hill Liveable Neighbourhood principles, making a positive contribution to the quality of life**
- **No increase in traffic levels or parking on Entry Hill and adjacent roads**
- **Safe, open access to the site for exercise and recreation and investment in a café as a community hub**
- **Preservation of the existing wildlife populations on the site; and improving biodiversity.**
- **Proper regard for safety issues arising from contamination on site; as well as adequate site security to ensure safety and comfort for neighbouring homes**
- **Comprehensive engagement with the community to co-design the site proposals**

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Being a good neighbour

The Local Plan policy D6 outlines the amenity that any development must provide –and excerpt is provided in Appendix 1. To prevent significant loss of quality of life to those living around the site, the following will need to be addressed and implemented:

1. The Impact Assessment for the proposed development should cover the likely impact of noise arising from the operation of the site, and detail actions to minimise noise nuisance for residents living near the site. Carefully designed natural screening/planting should be incorporated to minimise the impact of noise. There should be no facility for amplified sound or music on the site; and no sound/music systems should be allowed onto the site.
2. The outlook from properties bordering and overlooking the site should be preserved, with careful landscaping to safeguard the visual amenity of those homes and minimise loss of privacy. The boundary of the pay-to-ride area and other facilities should not be closer than 100 metres from any residential property.
3. The final design should incorporate natural planting (trees and bushes) to enhance the overall amenity of the site and effectively screen newly constructed facilities from adjoining homes. This should include screening for the security fencing around the pay-to-ride facilities.
4. The hours of operation for the pay-to-ride bike tracks, the café and other facilities should be limited to between 9.00 to 17.30, Monday to Sunday. The site as a whole should be closed before dusk and no later than 8pm.
5. No artificial light should be used unless specifically required for safety and security reasons. Any such lighting should be kept to a minimum and appropriately designed/installed to minimise light pollution.
6. There should be no competitions or similar bike events on the site at any time. There should be restrictions on the arrangements for hiring out the café, bike park or any other part of the site for 3rd party events. These should generally be limited to normal opening hours, with limits to the number of people involved. The café should not have an alcohol licence.
7. The site should follow and adhere to strict environmental standards and policies, including low waste, reusable and recyclable materials etc.

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Access, Traffic and Parking

Entry Hill has known issues with traffic and safety along its whole length, and discussions and proposals to reduce these problems have been ongoing well before the change of use of Entry Hill Golf Course was first communicated. BANES Council describe this as a facility for local users of all ages, who will be encouraged to cycle to the site, rather than a 'visitor attraction'. There needs to be detailed assessment of this position - of how many users will choose to drive to designated parking areas due to the practicalities of cycling relatively long distances, where no safe family-friendly routes exist; and due to the steep gradient of roads to/from the site.

It is essential that the proposal being considered for the site does not add to the existing traffic and safety concerns. Specifically:

1. The access point to the pay-to-ride area should be located on the Wellsway (West) side of the site, to link with bike routes and footpaths and minimise the number of visitors arriving from Entry Hill. The bike hire facility, bike workshop and any associated bike shop should also be located here, at the primary bike visitor entry point on the Wellsway.
2. A detailed travel plan should be in place before any work begins on site, with clear and specific arrangements to enable visitors to reach the site in ways that avoid any increase in traffic on Entry Hill and visitor parking on Entry Hill, Entry Hill Park or nearby roads. This travel plan should include negotiations for park-and-cycle or dedicated transport from Odd Down Park & Ride, or similar from the Odd Down Sports Ground. Continuous, safe and family-friendly cycle routes from these locations to the site must be in place before any pay-to-ride bike facilities are opened. Cycle routes should be implemented more widely, to assist and encourage cycling to the site from the Bath local area.
3. No parking should be provided on site at the existing Entry Hill Golf Course car park, except as legally required for disabled access and emergency vehicles. Any expected "unavoidable" visitor arrivals by car should be clearly directed by road signs to designated offsite car parking provision (e.g. Odd Down Park & Ride and/or Odd Down Sports Ground car parks). The travel plan should include provision of a reserved 'drop-off zone' close to the main entrance for bikes and pedestrians on the Wellsway side of the site. This drop-off provision should not be on Entry Hill. If there is a requirement for any additional vehicular access onto the site (other than that for disabled or emergency vehicles above), this must only be considered via a Wellsway entrance.
4. The address of the Bath Bike Park should be given as Wellsway, not Entry Hill, with website directions etc shown to and from the Wellsway entrance. On-street direction signs should direct all road traffic to off-site parking and the Wellsway drop-off zone. Cycle and pedestrian access should be primarily signed to Wellsway, with local signage for pedestrian, disabled and service access only on Entry Hill. Any marketing, publicity or publicly available information must make it very clear that there is no on-road parking available in the vicinity of the site, and that visitors need to plan their travel arrangements carefully in advance.
5. These measures need to be clearly enforced through management measures, and reported to BANES council regularly to demonstrate the effectiveness of the Travel Plan implementation, with the risk of penalties if the Travel Plan objectives are not met.
6. To enhance the local amenity value of the golf-course redevelopment, convenient and direct pedestrian and cycle access must also be provided to link Wellsway to Entry Hill. (This should be in line with existing "Scholars' Way" plans.)
7. Residents Parking Zones in Entry Hill and adjoining residential areas must be introduced to prevent bike park users driving to the site and parking on Entry Hill, Entry Hill Park and Wellsway, subject to residents being consulted and found to be in favour of this.

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Community Facilities

The former Entry Hill Golf Course site is an important 'green lung' on the south side of the city, with stunning views over the city and surrounding hills. This valuable site should be available to enjoy by all sectors of society – BANES Council's stated goals are that the site should offer a "green destination for walkers, families and nature-lovers" [BANES press release, 26 February].

The current concept plan should be re-worked to provide a better balance between this goal and the pay-to-ride' downhill cycle tracks; with better amenity provision for non-bikers, walkers, joggers, dog-walkers, and the disabled. Without this, there is a real risk that the site will become a niche visitor attraction, biased towards downhill mountain biking and its associated demographic (male, white, high-income). The opportunity to create a new, more accessible site will have been lost. The following aspects need to be incorporated to ensure that the Council's aims for the site are delivered, and to avoid losing the opportunity to create a valuable asset for the whole community:

1. We do not believe that a specialist bike park contractor such as Architrail Velosolutions is best placed deliver an inclusive and fully rounded plan for the whole site. An experienced landscape architect must be engaged to develop an overall plan for the site, to resolve the various uses and facilities, site levels and planning issues, within which the specialist downhill bike trails provided by Architrail Velosolutions will sit.
2. The community areas must comprise interesting and attractive zones, integrated within the site, rather than the current plan that shows the free-to-access space as a narrow corridor outside the perimeter fencing of the pay-to-ride area. This should include picnic spaces, seating and quiet zones within the free access portion of the site.
3. The community facilities and amenities should be in place at the time of opening of the bike park, and should not be contingent on volunteering / crowdfunding.
4. Plans for the site should include safe, open free access to the site for exercise and recreation, with imaginative walking and running routes across the site, accessible bike trails in flat areas and adequate space where dogs can be walked off lead. These routes should be carefully planned to minimise conflict between cycles, pedestrians and dogs. The more generous the space available, the easier it is to minimise such conflict. In total, the free to access community area must in the final design must account for at least 50% of the total area of the site. If such areas are "low value" in terms of usefulness to the community, the overall percentage available should increase appropriately.
5. A community café should be integrated into the free-to-access part of the site, suitably sited to avoid any noise or visual disruption to boundary residential properties. The café should be of high-quality design and construction, sympathetic to the surrounding character and in keeping with the Conservation Area and World Heritage Site location; and offer a quality and standard to be an attractive destination for local users.
6. The unique position and outlook of the site should be maintained for all, with the free to access portion of the site incorporating the best of all the existing unrestricted viewpoints looking over Bath and surrounding hills. (These are of less importance to those using the bike trails.)

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7. The design of the site should include direct access from Wellsway to Entry Hill for people with disabilities and/or pushchairs, with a suitable surface/gradient. In general there should be specific and reasonably sized areas suitable for wheelchair and pushchair access.
8. The design for the site must recognise the very significant value that visitors gain from experiencing the wide variety of wildlife that current inhabits the site. As well as a wide range of birds, including buzzards and woodpeckers; deer, foxes, badgers, bats, grass snakes and slow worms are seen regularly observed by keen eyed visitors. This hugely enhances their enjoyment of the site and encourages outdoor activity and exercise throughout the year. There is more detail in the section below on Ecology and Diversity.

Ecology and Biodiversity

It has been stated that this project, once implemented, will be a “green destination for walkers, families and nature-lovers that will boost the ecological diversity of the site” [BANES press release, 26 February]. The site is already home to many species of wildlife and there are well-established populations of animals who have lived on the site for decades. The importance attached to this by residents cannot be underestimated.

We specifically require that:

1. A full ecological survey must be undertaken by a qualified ecologist, to identify the full range of animal and plant species currently present on the site and the size of the current populations. This will become the baseline for measuring whether the goal of ‘boosting ecological diversity’ is met. There should be full transparency in communicating how the ecological survey will be conducted and by whom.
2. A full arboricultural survey must be undertaken by a qualified arboriculturist, identifying the quality of all the trees on the site and defining their root protection areas which must not be affected by the proposed construction. A full impact statement must be carried out to ensure that the trees on the site are not harmed by the development.
3. The study must set out detailed requirements for how the impact on the animals and plants living on the site, including European protected species, will be monitored and managed during the construction and subsequent operation of the bike park. It should provide specific explanation of the steps that will need to be taken to achieve a net increase in biodiversity. Licences from Natural England must be obtained to ensure works do not affect habitats of protected species, such as nesting birds and bats, and a strategy set out for how these works will need to be conducted, and in what season. The study should be published in full.
4. The study should fully account for the physical and mental health benefits people gain from engagement with the natural world; and make recommendation for how the site can be enhanced to maximise the opportunities for community involvement on the site.

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Environmental and Safety Factors

Environmental and Safety factors should be considered and addressed during planning, construction and operation of the site. Specifically, the complications and risks due to its history as a municipal waste site need to be assessed and adequately mitigated. The following requirements should be met:

1. There should be full transparency on how the contamination surveys are being conducted, by whom and when they are happening. The survey should be published in full.
2. Survey work should consider the full red line boundary of the site, and not only specific areas, its history, what is known/not known about the contents and how it has been monitored and managed to date.
3. The survey should provide requirements for the management and monitoring of contaminated land during the construction and subsequent operation of the bike park, and any remediation works required prior to construction to prevent the release of harmful contaminants that could endanger human health. This should include specific arrangements for the continued monitoring for methane and radon gases. A strategy setting out the mitigation required at any stage of the construction or operation of the project, should contaminants be released, must be approved and monitored by BANES, LPA and the HSE, and all activities to cease pending further assessment and remediation if risks to human health are discovered. Reassurance is sought that financial reserves are maintained in the long term to enable such remediation to be undertaken whenever risks may arise.
4. The proposed construction works (in particular excavation for bike trails, buildings, buried services etc) need to be communicated to residents, along with plans to address all risks associated with the construction.
5. Given the potential impact of contamination of/from the site, ongoing regular monitoring of the soil, air and groundwater must continue around any area where soil has been disturbed in order to protect users and residents.
6. Excavation work on the site should be minimised and the design and location of trails should follow the existing contours and topography of the site as far as possible, which will also avoid bringing in large amounts of aggregates and other building materials.

Project Implementation / Construction

The project to develop the site will be a significant and complicated undertaking, especially given the history of the site as a municipal refuse dump. There will need to be significant oversight by various third parties with specific expertise as appropriate to a project of this size. From the perspective of the community, the following points will need to be addressed:

1. A construction management plan, including transport and logistics, must be prepared and approved by BANES LPA and the fine details discussed with nearby residents who are likely to be affected. There needs to be a clear plan for the delivery of materials and equipment to the site during the construction phase, with a safe construction site operated and no delivery vehicles queuing for access on Entry Hill.

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2. Industry Code of Construction Practice must be adopted, Health and Safety Executive (HSE) legislation and obligations under Construction Design and Management (CDM) Regulations adhered to, and all construction management professionally overseen. Contact details should be freely available to residents and effective communications maintained in case of issues arising.
3. Safe and well organised arrangements should be made for the delivery of prefabricated buildings to the site.
4. No site workers vehicles to be parked on Entry Hill at any time.
5. There should be a limit on the hours of construction operation on the site, with no machinery being operated outside of core hours of 8am to 4pm Monday to Friday.
6. The roadway and footpaths around the site to be kept free of mud and debris at all times.

Remediation of the site

In the design and planning phase, BANES should fully consider how the trails, fences and other constructions and features (i.e. pump tracks, skills areas, dirt jumps) including associated aggregate, concrete footings etc, can be safely removed without disturbance or risk of release of contaminants from the former land fill site, in the event that the bike park is not a success and is forced to close. There should be consideration of the potential long-term damage that the bike park could introduce, significant reinstatement costs (to BANES) during these works and how the community space can be practically and safely re-purposed as an alternative community facility.

Conclusion

This paper can also be found on the Entry Hill Community Association website, along with other information about the proposals for the redevelopment of the former golf course site on Entry Hill. There is also more information about the area. If you would like to contact us about anything you read here, to let us know what you think about the proposed Bike Park development or other issues about the Entry Hill community area, you can do so via our website <https://www.entryhill.community/entry-hill-mountain-bike-park> - you can also ask to receive email updates about this issue and other relevant matters. Or email us directly at entryhill.ca@gmail.com.

Appendix 1

Local Plan Policy D6: Amenity

This states that:

Development must provide for appropriate levels of amenity and must:

- a Allow existing and proposed development to achieve appropriate levels of privacy, outlook and natural light
- b Not cause significant harm to the amenities of existing or proposed occupiers of, or visitors to, residential or other sensitive premises by reason of loss of light, increased noise, smell, overlooking, traffic or other disturbance
- c Allow for the provision of adequate and usable private or communal amenity space and defensible space
- d Include adequate storage and functional arrangements for refuse and recycling
- e Ensure communal refuse and recycling provision is appropriately designed, located and sized.