

Our Ref: 07C000314

8 October 2021

Local Plan Options Consultation
Bath & North East Somerset Council
Manvers Street
Bath
BA1 1JG

Via email only: planning_policy@bathnes.gov.uk

Dear Sir or Madam

**Representations to Local Plan Partial Update Public Consultation – 27 Aug to 8 Oct 2021
On behalf of Kingswood School, Bath**

We write on behalf of our client, Kingswood School, to make representations to Bath and North East Somerset Council's (B&NES) Local Plan Partial Update Public Consultation.

This representation follows our representations to the Partial Plan Commencement Document in May 2020, the Call for Sites submission made in June 2020 and representations to the Options Consultation in February on behalf of the school. As set out within those representations, Kingswood School encompasses both the Senior and the Preparatory Schools and is the freehold owner of a suite of sites which sit within their portfolio linked to their main campus at Lansdown, Bath. This portfolio consists of two main locations comprising: the School campus/Middle Field, comprising listed buildings, residential boarding houses, indoor and outdoor sports provision and agricultural land, and the Upper Playing Fields currently comprising sports pitches and associated sports facilities. The school campus also includes a small area of land known as 'Goat Field', which falls immediately to the west of the Bath University Sion Hill site. The total portfolio represents a significant landholding in Bath which extends to approximately 73 ha (c. 180 acres).

These representations set out that the Upper Playing Fields site should be reviewed for allocation through the Partial Plan Update as it is an opportunity to provide housing in line with the District's spatial strategy, as well as wider public benefits associated with investment in the school's existing heritage buildings and education facilities. We would also highlight that the Goat Field sits immediately adjacent to Bath University's Sion Hill campus, which has been proposed as a housing allocation. The Goat Field could be designed to form part of the wider Sion Hill redevelopment proposals through additional provision for green space, biodiversity or play space.

The Upper Playing Fields site would be sustainably located at the edge of the settlement of Bath in proximity to a range of services, including but not limited to a local shop, pub, the Lansdown Park & Ride, education provision and recreation routes. Partial redevelopment of the site, with residential development focussed on the previously developed areas of the tennis courts and car parking, would provide housing in an accessible location in line with the B&NES Spatial Strategy.

In 2013/2014, the School instructed Fielden Clegg Bradley and Avison Young on the preparation of an estate-wide strategy to consider how the school would expand and grow to meet future needs.

This piece of work considered a holistic strategy, outlining the School's growth and development needs in the short-to-long term, as well as examining the spatial constraints and a range of options available to meet the identified requirements of the school.

The land for residential development would be made available through re-configuration and re-provision of the current sports facilities as part of the School's Estate Strategy. In recent years the squeeze on school budgets has prevented all but minor investment on the Estate and it is critical that the School carefully considers how future investment in its estate can be funded whilst also providing the best facilities possible to meet its future educational needs. This is particularly so with Kingswood School as the estate contains a series of listed buildings and structures that require a programme of upkeep and investment to ensure that they do not fall into disrepair. The disposal of the land would therefore provide capital funding to maintain and enhance these important assets.

Development Team pre-application advice from B&NES was provided in January 2014 and written advice from officers at the time made the following comments about the tennis courts and surrounding playing fields:

- Considered that the tennis court site could be redeveloped as a Primary School with a building of the same size and style as the adjacent sports pavilion. At the time it was considered that this would be a way to resolve education provision on the adjacent Ensleigh site, however, a new primary school has now been built as part of the Ensleigh redevelopment. Notwithstanding, this demonstrates that redevelopment was considered feasible in principle.
- General requirement of a proposal to revise the Green belt / AONB boundary so that it creates a logical boundary between any redeveloped areas and the playing fields.

Sustainability Appraisal Site Assessment

We note that the Housing and Economic Land Availability Assessment (HELAA) provides an initial assessment of the upper playing fields (ref. LAN06c) and highlights that the site is potentially available, potentially achievable and that it has secondary potential in terms of suitability. We have therefore reviewed the Sustainability Appraisal Site Assessment for the Upper Playing Fields and provide our commentary against each Objective below.

SA Objective	Commentary
Objective 1: Improve the health and well-being of all communities, and reduce health inequalities	We agree that the site is in a location with good access to services including health and well-being facilities. The development would propose the re-configuration of existing sports facilities currently owned and operated by Kingswood School. The proposal includes for the replacement of facilities that would be lost through residential development. Feasibility studies indicate that the development would result in the loss of some of the existing sports provision, however, this will not be to the detriment of provision for each type of sport. Feasibility studies indicate that for the 'maximum' option, there would

	<p>be a reduction of 1 pitch/oval or court for tennis, cricket, football and rugby (full size pitch) but at least 3 of each pitch will continue to be provided. There would be a reduction of 3 under-15 rugby pitches, however, it is proposed to replace this with a new 4G astro rugby pitch that would provide all-weather provision for rugby.</p> <p>Kingswood sports teams have earned a strong reputation for team sports and the fixture list comprises many 'block' programmes where the School entertains multiple age group teams. The re-provided sporting facilities would be a step-up in quality from the current 'very good' level of provision. In addition, the new layout would allow the school to partner with Bath Rugby, Bath Netball, Old Sulians RFC, Bath Cricket and Lansdown Tennis to deliver a programme of sporting activities. Liaison with these partners is already underway and a development proposal would support these discussions.</p>
<p>Objective 2: Meet identified needs for sufficient, high quality housing including affordable housing</p>	<p>We agree with the assessment that the proposal would contribute to the provision of a mix of high-quality homes and affordable housing in line with planning policy requirements.</p>
<p>Objective 3: Promote stronger more vibrant and cohesive communities and reduce anti-social behaviour, crime and the fear of crime</p>	<p>The proposal would be designed to integrate with the adjacent Ensleigh community, and we agree that it is likely that residential development would increase footfall at the Spar as well as utilise the nearby school and play area.</p>
<p>Objective 4: Build a strong, competitive economy and enable local businesses to prosper</p>	<p>Construction jobs would be created through the development. In addition, the capital receipt from the release of the school's land would also fund investment in Kingswood School, which is a major employer and education provider within Bath. The development would contribute to meeting the School's objectives in terms of investment in education and in maintaining and enhancing the listed buildings in their ownership, with indirect economic benefits in terms of job creation, skills and training.</p>
<p>Objective 5: Ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure</p>	<p>The site is located near to Lansdown Park and Ride with bus services passing the site regularly. The Sustainability Appraisal identifies mitigation and enhancement that could be delivered through the proposed development of the site. This would achieve improvements to pedestrian connectivity in the vicinity of the site.</p>

<p>Objective 6: Protect and enhance local environmental distinctiveness and the character and appearance of landscape</p>	<p>A Preliminary Landscape and Visual Appraisal has been undertaken and accompanies this representation to consider the landscape character in proximity to the site. This sets out that there is potential for the site to be seen in longer distance views from Prospect Stile, Little Solsbury Hill, Twerton Roundhill and Widcombe Hill. In such distant views, however, the site is likely to be a minor element in what are panoramic views and also likely to be variously concealed by intervening built form and/or vegetation.</p> <p>The housing would be located within the more enclosed south-eastern part of the upper playing fields and away from the more open edges of the site.</p> <p>The proposal offers an opportunity to deliver a comprehensive landscape strategy with new planting to replace areas that are currently occupied by existing car parking and tennis courts. Through an appropriate landscape and design strategy, there are opportunities to avoid, minimise and mitigate effects to landscape and visual receptors.</p>
<p>Objective 7: Conserve and enhance the historic environment, heritage/cultural assets and their settings</p>	<p>The site is located in proximity to Beckford's Tower (Grade I listed) and the grounds of a Victorian cemetery on Lansdown Road, which includes other listed structures and buildings. The existing tennis courts, pavilion, car parking and sports facilities provide a baseline that includes built form and development in views to and from Beckford's Tower.</p> <p>Development at Ensleigh, now nearing completion, has introduced an altered roofscape (compared to the previous MOD buildings) into views to and from Beckford's Tower. The proposed layout provides opportunities for tree planting and screening that would replace the existing fences and car parking currently visible from Lansdown Road.</p> <p>The proposal would deliver public benefits through the provision of new housing and affordable housing on previously developed land as well as a strong landscape strategy with biodiversity enhancement and green infrastructure. In addition, the capital receipt from the project would provide conservation gain through investment in the maintenance and enhancement of existing listed buildings within Kingswood School's ownership including the main school building, Chapel and Belvedere Tower (Blaine's Folly).</p>

<p>Objective 8: Conserve, enhance and restore the condition and extent of Biodiversity in the district and geodiversity (taking account of climate change)</p>	<p>There is an SNCI within the upper playing fields site, however, any proposed residential development would not be within the SNCI designation. The development would deliver the opportunity to enhance the SNCI through a landscape strategy that will incorporate biodiversity enhancements and the potential for extension of the SNCI.</p> <p>The area designated as SNCI is already in use and managed as sports pitches. Any intensification of use would be managed by the school and could be agreed through a management plan. Part of the area proposed for residential development is currently tennis courts and car parking. These areas are not currently grassed areas and redevelopment would provide clear opportunities for new grassland habitats to be incorporated into development together with a strategy for biodiversity net gain.</p> <p>Further ecological assessment of the site is required and we therefore disagree with the assessment that there would be a major negative effect on ecology for the following reasons:</p> <ul style="list-style-type: none"> • The tennis courts and car parking areas are previously developed land that offer limited ecological value. • Any intensification of sports facilities would be managed by the school and would be agreed with the council through a management plan. • The sports facilities would be open to the public only via agreement with the school. • The development would not fall within the SNCI. It would incorporate biodiversity net gain.
<p>Objective 9: Reduce land, water, air, light, noise pollution</p>	<p>As set out within the Sustainability Appraisal, a sensitive lighting strategy could be designed to control light spill.</p>
<p>Objective 10: Reduce vulnerability to, and manage flood risk (taking account of climate change)</p>	<p>The site is unlikely to be affected by flooding.</p>
<p>Objective 11: Reduce negative contributions to and Increase resilience to climate change</p>	<p>We agree that the development would be required to meet carbon reduction targets and adopted planning policies in relation to climate change. There are opportunities through the development to integrate new landscaping, sustainable drainage, biodiversity net gain and carbon reduction measures.</p>

<p>Objective 12: Encourage careful, efficient use of natural resources including energy and encourage sustainable construction and promote waste management accordance with the waste hierarchy (Reduce, Reuse and Recycle)</p>	<p>As set out within the Sustainability Appraisal, the development would be expected to reduce carbon dioxide emissions in line with policy.</p>
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Assessment Summary

The proposals will deliver development on previously developed land in a sustainable and accessible location in line with the Development Plan spatial strategy. The proposals will make appropriate provision for replacement and new sports facilities as well as providing opportunities for tree planting and biodiversity to integrate with the adjacent SNCI. We disagree that there would be a major negative effect on biodiversity as part of the site is previously developed land and there has not been a thorough assessment of the managed sports pitches.

Residential development would also have wider public benefits as it forms a critical part of the school’s future investment and funding strategy. It would allow the school to generate funds for reinvestment in major school capital projects to further enhance the array of current buildings, maintain its Grade II listed buildings and heritage structures, improve sustainability and to reduce environmental impact.

It is recommended that the land comprised of tennis courts and car parking within the upper playing fields site is re-considered as an allocation to deliver new housing at the edge of Bath, on brownfield land outside of the green belt. It is a deliverable site that aligns with the Local Plan spatial strategy and would make a valuable contribution to housing supply in the current plan period to 2029.

Goat Field

We also wish to take this opportunity to highlight that the Bath University Sion Hill site (ref. SB24) falls immediately adjacent to the Kingswood School ownership boundary. As part of the school’s Estate Strategy there is a parcel of land adjacent to the university’s Sion Hill site, known as the ‘Goat Field’. This is east of Sion Hill Place and could integrate with new development to provide additional benefits such as ecological enhancements as part of a holistic redevelopment strategy for the university site.

Conclusions

This representation has been prepared by Avison Young on behalf of Kingswood School in response to the current consultation on the Local Plan Partial Update. In summary, it is considered that the Upper Playing Fields site should be further reviewed for inclusion as it is an opportunity to provide housing in line with the District’s spatial strategy as well as wider public benefits associated with investment in the school’s existing heritage buildings and education facilities. We have reviewed and provided commentary on the Sustainability Appraisal Site Assessment to

support the Council's consideration of the site. The Goat Field also offers an opportunity to support and deliver additional development when considered holistically with redevelopment of the Sion Hill university campus.

I hope that the comments set out above will be duly considered and will assist in informing the next iterations of the Local Plan Partial Update document. The school would very much welcome the opportunity to discuss the estate strategy and Upper Playing Fields site with the policy team and provide any clarifications as required. Please do not hesitate to contact me on 0117 988 5321 / charlotte.taylor@avisonyoung.com should you wish to discuss.

Yours faithfully



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For and on behalf of Avison Young (UK) Limited

Enc. NPA Preliminary Landscape and Visual Appraisal