

Issue 2 Sub Matter: Bath Spatial Area

Respondent Reference 318 – MOD Defence Estates

Examination of Bath and North East Somerset Core Strategy

Day 3 (Thursday 19 January) – Bath Spatial Area

Submitted on behalf of the Ministry of Defence by Defence Infrastructure Organisation

Contact: Rob Sanderson, B.A (Hons), Dip. T.P., M.R.T.P.I.
Tel: 0121 311 3852
Email: DIOOpsnorth-PTS3a@mod.uk

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1.0 Introduction

- 1.1 The Ministry of Defence (MOD) owns three sites in Bath: Ensleigh, Warminster Road and Foxhill. Together, the sites amount to some 36 ha. in area. Following a period of consultation, it was confirmed by the Minister for Defence, Personnel, Welfare and Veterans in July 2011 that all MOD personnel would be relocated from the sites by March 2013 and that the sites would then be disposed of.
- 1.2 The MOD is fully committed to making the three sites available for development, in accordance with the priority attached by the Government to accelerating the release of public sector land and has already commenced marketing part of Ensleigh – ‘E’ site – with a view to completing the sale by March 2012. Marketing agents have also been appointed to sell the remaining sites by March 2013. (All three sites are part of the land identified by the MOD as part of its contribution to the Government’s target of making sufficient public sector land available to accommodate 100,000 homes, up to 2015).
- 1.3 MOD considers that the sites should be developed predominantly for residential purposes, taking account of their location and the significant contribution that they can make towards meeting local housing needs.
- 1.4 This statement is intended to respond to two questions raised by the Inspector in ID/7, relating specifically to the MOD-owned sites.

2.0 Are the SHLAA's expectations for housing delivery from the 3 MOD sites realistic ?

- 2.1 No. MOD believes that the SHLAA potentially under-estimates the contribution that the three MOD sites could make to the Council's residential land supply.
- 2.2 The SHLAA estimates that the Warminster Road site could accommodate around 140 dwellings; that Fox Hill could accommodate around 750 dwellings and that Ensleigh (including 'E' site) could accommodate up to 400 dwellings, although that might be reduced if an element of employment use is retained on the site.
- 2.3 The SHLAA capacity estimates are based on the assumption that around 80% of a site will be developable, taking account of land required for main distributor roads, buffer zones, structural landscaping and general open space. While all of those elements may be required, the area of land required for each will vary for each site. In particular, the amount of land required for general open space will need to have regard to the specific characteristics of each site and to its surroundings. At Warminster Road, a significant proportion of the MOD-owned land – around 2.6 ha, the land outside the security fence - is currently open and is a Site of Nature Conservation Importance; it seems reasonable that this would meet any requirement for 'natural' green space for the development. The topography of the site would tend to discourage on-site provision of useable formal open space within the built-up area. Fox Hill adjoins a recreation ground and a rugby ground and it is possible that it might be more appropriate for a developer to make a financial contribution towards improving existing facilities than to make on-site provision. Similarly, the Ensleigh Main Site adjoins extensive playing fields and there are also other facilities nearby: again, it is possible that a more flexible approach towards open space provision would be appropriate.
- 2.4 There are no over-riding constraints that would prevent the redevelopment of any of the three MOD sites for residential purposes:
- i) Heritage

None of the sites are occupied by listed buildings or Scheduled Ancient Monuments.
 - ii) Ecology

Land outside the security fence at the Warminster Road site is designated as a Site of Nature Conservation Importance, a non-statutory designation. Extended Phase 1 habitat surveys have been carried out on both the Warminster Road and Fox Hill sites and concluded that the majority of habitats present within the sites were of low value for biodiversity. No evidence was found of use of the sites by badgers or dormice, although it was felt that there was some potential for trees on the sites to be used by roosting bats. No habitat surveys have been carried out on the Ensleigh site, although the range and value of habitats there appears to be limited.

iii) Access

All three of the sites have been used satisfactorily for employment purposes: 770 people were previously employed at Warminster Road, utilising 360 car park spaces on the site; a maximum of 2,500 people were employed at Fox Hill, utilising 1,502 car parking spaces; around 1,560 people were employed at Ensleigh, utilising the 909 car parking spaces there. While it is recognised that traffic arising from residential development of the site would be different in character, the surrounding road network has previously dealt with large volumes of peak-time traffic associated with the sites and it is felt that any access issues are unlikely to be insurmountable. All three sites are located close to bus routes and, in the case of Warminster Road, in reasonable proximity to the City Centre.

iv) Ground Conditions

MOD is not aware of any ground condition issues that would prevent the development of any of the sites for residential purposes.

Prior to their acquisition by MOD, the Ensleigh and Warminster Road sites were undeveloped and are not known to have any instability or contamination constraints.

Ground conditions on the Fox Hill site have been thoroughly investigated. Three relatively small parts of the site were mined for stone prior to its acquisition by MOD: an area of underground mining, near the Bradford Road entrance of the site and two areas of surface quarrying. The area of underground mining was stabilised as part of the Combe Down Stone Mines Stabilisation Project, in 2009; the two areas of surface quarrying have also been infilled at some time in the past. However, subject to appropriate precautions, development would nonetheless be possible within these three areas. Ground conditions across the rest of the site appear consistent with the wider Bath area.

3.0 Are the SHLAA's expectations for housing delivery consistent with the most up to date position of the MOD ?

3.1 Yes, generally, although the MOD's position with regard to vacating the sites has been clarified since the SHLAA was initially published, resulting in some differences. The SHLAA Update (November, 2011) summarises subsequent discussions with the MOD, while the DIO Interim Land & Disposal Strategy adds more detail. The assumptions in the Council's SHLAA and SHLAA Update and in DIO's Interim Land and Property Disposal Strategy (October, 2011) are set out in Table 1, below.

Table 1: Anticipated Vacation of MOD Bath Sites

Site Name	SHLAA (CD4/H14)	SHLAA Update (Nov, 2011) (CD4/H16)	DIO Interim Land & Disposal Strategy
Warminster Road	2012/13	2012/13	2013
Fox Hill	2013/14	2012/13	2013
Ensleigh	2013/14	2012/13	40% of Main Site in 2012; remainder 2018. 'E' site to be sold by April 2012.

- 3.2 Relocation of staff to enable the sites to be vacated is proceeding, to meet the timetable in the DIO Interim Land & Disposal Strategy. It is anticipated that all personnel will have vacated the Warminster Road and Fox Hill sites by March 2013, with vacant possession available in summer 2013. With regard to the Ensleigh site, 'E' site will be vacated by March 2012: it is currently being marketed and will be sold by April 2012. It is anticipated that the remainder of the Ensleigh site will be sold by April 2013, with a lease-back of around 60% of the Main Site until summer 2018, when the IT system located there becomes obsolete. The remaining 40 % of the Ensleigh Main Site will be vacated by March 2012, with vacant possession available by summer 2013. (Altogether, 'E' site and the area of Main Site to be vacated in 2012 amount to some 5.1 ha – around half of the total site area).
- 3.3 Proposed Change 35 should be further amended to reflect the certainty of the Ensleigh site being released for development by the MOD.