

Representation ID Number: 96 / 1

At last night's planning and development committee meeting, the consultation on the MOD statements was discussed. The Town Council support the 'development that delivers significant numbers of high quality homes and that achieves the site's full potential contribution towards meeting the city's overall housing needs'.

Representation ID Number: 102 / 1

1. These comments apply to all three Concept Statements (Ensleigh, Foxhill and Warminster Road) unless otherwise stated. Broadly, they concentrate on (a) the prescriptive requirements laid down, (b) the housing densities envisaged, leading to (i) internal dwelling areas too low to provide for reasonable storage and (ii) a building grain quite different from that in the near vicinity (particularly at Ensleigh), and © high levies on the prospective developers to help pay for schools, public transport, etc.

Prescriptive Requirements

2. FoBRA feels that the information provided by the Council is too prescriptive, thereby stifling the possibility for architects to develop their own vision. Instead of simply providing the necessary planning brief the Authority has put forward its own vision (or "Concept Statement") and expects the chosen architects to conform. This may not be the way to get the best design from architectural consultants: surely it is they who should be providing the concept statement?

3. Each B&NES' Concept Statement sets down a requirement for high quality, but at the same time indicates a large number of solutions it wishes to see, inhibiting chosen architects. For example,
 (a) There is a clear indication of the expected road layout;
 (b) Footpaths are required to be constructed in natural stone which sits unhappily alongside a requirement for the layout to be based on shared space principles;
 © The permissible external wall materials are indicated, as are the roof finishes;
 (d) The area of formal open space is stated, as is the area of natural open space; and
 (e) In the case of Ensleigh, there is a clear desire to have a stone wall fronting Lansdown Road and a roundabout access to the site in a particular position,

whereas some would say that little more is needed than the mix and rough number of dwellings required, an indication of surface treatments needed, the space required for schools, etc, the allotments and the B1 office floor space. On that basis the designers would be able to analyse the environmental constraints operating on the site and develop their own architectural vision which might not, of course, coincide with that already set down by the Council, but by operating in this way the Council would be opening itself up to fresh thinking from outside and would devolve risk.

Note: there is, of course, one part of one site which requires particularly careful treatment, and this is the edge of the Charlecombe valley at Ensleigh, because of its visibility from the World Heritage Site below. Here FoBRA urges the Council to be specific about low height, appearance and traditional surface treatment of any buildings permitted; and also about light pollution and protuberances such as wind turbines.

High Housing Densities

4. The Ensleigh site has an area of 10.35 hectares. Once space for the other needs are allocated this could result in a housing density as high as 50 dwellings per hectare (dph). It is assumed the other two sites are similar. DCLG statistics show that in England (excluding London) densities of development rose from 12 dph in 1985 to 40 dph in 2004, so in 20 years densities more than tripled, and now seem set to quadruple! The pressure is clearly on to pack in dwellings ever more tightly, but Ensleigh is located at the top end of Lansdown which is in an area of very low density. As such the new development at so high a density will not form part of the grain of Lansdown and may be seen as a foreign intruder or ghetto, with all the social consequences that spring from these. Is this wise?

Minimum Space Standards

5. The 1961 Parker Morris report on internal space was admirable, setting remarkably high standards, but after 1980 the government allowed these to lapse and since then there has been a drive to the bottom, with the only bright area being the Greater London Authority's (GLA) re-adoption of standards, albeit at a slightly lower level than Parker Morris. Recent building in Bath (eg Bath Western Riverside and Southgate) has resulted in significantly lower floor areas than both Parker Morris and GLA. FoBRA therefore believes the Council needs to lift standards again, by setting minimum space standards

(Minimum Internal Dwelling Areas - MIDA), if it requires developments to be of high quality, as the Concept Statements say. Further, it should follow the GLA's lead in specifying floor areas for Cooking, Eating and Living (CEL) standards. Without these, the high cost of stipulated environmental standards (eg natural stone footpaths) is likely to be mitigated by developers' reducing space within dwellings, particularly storage cupboards, about which there has been much recent press comment.

Levies

6. The draft Concept Statements envisage various facilities beyond houses and commercial property, which generate fees or income, such as schools, surgeries, allotments, roads, paths and, perhaps, public transport. They state that "A financial contribution to identified infrastructure" will be included, presumably through Section 106 or CIL procedure. While it is proper that the burden of creating the infrastructure should not fall wholly on the local taxpayers, FoBRA believes that the proportion to be borne by the developers (and hence by the purchasers) must be made clear so that costings are based on facts.

Representation ID Number: 224 / 1

The Core Strategy was light on detail in relation to the MOD sites and without further evidence we are not at all convinced that the volume of housing, open space, B1 use and transport infrastructure proposed in the concept statement(s) can be fitted onto this site given the constraints clearly set out in the landscape appraisal evidence base. We believe that it is essential for a basic masterplanning assessment based on massing and volume be done in order to revise the concept statement(s) and prior to marketing of the site.

If the Concept statements are 'to summarise the analysis of the sites' then we believe that the Council's credibility could be affected by an unrealistic target for dwellings etc, and could be very damaging if the sites goes to market with these assumptions.

Further we think that the concept statement should confine itself to the brown field area. The Core Strategy and the NPPF have both emphasised the need to develop previously developed land ahead of any green field land, and it would therefore be misleading to suggest that the 'Kingswood' playing fields represent an acceptable potential area for extension of the site. The implication of the use of this land would be an encroachment into the Green Belt/AONB (and approaching the registered historic battlefield) for further playing fields, and there is no mandate for inclusion of this land from the Core Strategy or elsewhere. If all of the brown field land in B&NES were developed as planned then the housing need would be met and therefore there is no call develop green field land in addition. It is important therefore that the site is made to work without the implying that the Kingswood fields will be built out. The possibility should therefore be removed from the concept statement. If the Council's ambitions really are predicated on the availability and developability of the Kingswood site the marketing of the MOD site should be held back until that debate has been had in public and in full, including values of the land and implications of relocating playing fields further into the Green Belt/AONB/historic battlefield.

Detailed response

Page 1/9

Issue: Regret that WHS does not appear in Council's Vision box and not mentioned on p1, as site is within WHS and affecting its setting. 'Historic Environment considerations' should begin with recognition of the WHS values and the need to respond positively to them.

Suggested change required:

Strengthen reference to WHS values, p1 & 9.

Page 4 - site analysis

Issue: Should refer to Grade I listed Beckford's Tower with important views in and out (rather than just listed buildings)

Suggested change required:

Strengthen reference to Beckford's Tower.

Page 5/6 - (Ensleigh) The Council's vision

Issue: The Core Strategy and the NPPF only give a mandate for developing brown field land ahead of green field land.

While noting the green belt and AONB boundaries, we do not think it is at all suitable to put the Kingswood playing fields

into the mix at this point. An extended site this size would become an urban extension by any other name. While playing fields can be appropriate development in the green belt, the extension of the playing fields up further into the Green Belt and AONB has not been properly considered or assessed at this stage and cannot therefore be assumed to be acceptable. Suggested change required: Confine the concept statement to the MOD site, possibly including only the squared off playing field as developable land if the constraints in providing a viable community require it. At the very least, it should be made clear that further green field extension could only happen after ALL of Bath's developable brown field land had been developed out.

Page 8

Issue: Under 'Landscape & Ecology' the meaning of "Note that natural areas in proximity to the site could absorb demand...." is not wholly clear – is it that required open space provision may be met outside site? (How would this chime with adequacy of provision for existing housing?)

Page 7

Issue: Need for reference to the new/upcoming Sustainable Construction & Retrofitting SPD as primary development design tool, and the upcoming WHS Landscape Setting SPD.

Page 7

Issue: The development section does not set out over what area the Council is proposing these numbers of dwellings should be placed. Numbers should confine themselves to the brown field area and should emphasise the necessarily low-rise nature of the development (see evidence base emphasis on two storeys with third storey set-back maximum).

Massing work may need to precede sale.

Suggested change required: Test by massing work whether the concept statement numbers are realistic on brown field area.

Revise numbers if necessary.

Insert height reference within key components

Page 8/9

Issue: The section on design principles needs reordering and strengthening to take full account of the (very good) Evidence Base report. It should lead with the historic environment considerations. The section on scale and massing should be brought up and given more emphasis, with more specific reference to the evidence base. For example, the evidence base quotes the Bath Building Heights Strategy (2010) as saying explicitly 'Development which would be high enough to be seen above the tree line would be detrimental to the OUV.' They interpret this as meaning two storeys with setback (max). The scale and massing section should refer to views to Beckford's Tower (visible on all historic approaches to Bath) as well as views from it.

Suggested change required: Strengthen to give clear idea to developers of constraints, especially in relation to historic environment and massing, in order to avoid over-valuation of the land.

Page 9

Issue: The section on appearance, details and materials needs to be more specific about the range of acceptable high quality materials.

Suggested change required: Strengthen reference to traditional and high quality palette of materials, including natural slate and timber/metal framed windows.

Page 10

Issue: Environmental performance refers to suitable low carbon initiatives but should spell out that eg major wind turbines or high chimneys from site-wide combined heat and power biomass boilers are likely to be unsuitable within the landscape constraints

Perhaps mention should be made of the energy efficiency of terraced or part terraced formats.

Suggested change required: Offer guidance for energy saving preferences

Page 11

Issue: There will certainly need to be an EIA, on World Heritage landscape considerations alone, incorporating heritage impact assessment on eg views and entry to WHS based on draft Landscape Setting SPD.

Suggested change required: Remove 'preliminary'

Page 12

Issue Community engagement – should refer to NPPF references to early engagement, and emphasise that the Council will expect the developer to engage in substantive community consultation (not just immediate street locality) drawing attention to the fact that in Bath, well managed and responsive community consultation can lead to smoother passage through the planning system.

Suggested change required:

Strengthen reference to developer requirement for early engagement with community as well as Council.

Representation ID Number: 266 / 1

Visibility.

Noting that the three sites fit into Bath as a World Heritage site, they are visible from points around the City. The Warminster Road site, on one of the main access routes into the City, is the most important. The other sites, being higher than the Warminster Road site, have a different but important impact on the City.

Layout

All sites should integrate at their boundaries with the existing layout of their surroundings. The layout should allow for walking, cycling, minimum car movements and for bus access points. The existing green spaces (if any) and tree planting should be retained and extended. Road layout should not allow for through traffic routes.

Energy

All new dwellings should be designed for low energy and minimum water usage.

Transport

Buses should not be routed through the sites but to pick up points on the edges. Some visitor car parking should be provided.

Densities

Housing densities should be medium-high with a restriction on building heights, depending on ground conditions. Dwelling types should be of mixed type and size. Because of the high visibility of the sites, roof forms and coverings are important.

Amenities

The provision of medical and educational facilities depend to a great extent on the existing surrounding services.

Because of their location these three sites present a challenge and an opportunity to build for the future.

Representation ID Number: 277 /

Re :- Draft Concept Statements for MOD sites,
with particular regard to the Warminster Road Site

Thank you for inviting responses to the above Draft documents (the pagination of which is incomplete)

Once again we quote David Warren of English Heritage describing the Eastern approach to Bath “Whether by road, rail, river or canal must be one of the most beautiful of any town in Britain or elsewhere, and to harm the setting of that approach would be environmental sacrilege”. The first two paragraphs of your page one support this.

With regard to the Warminster Rd site, its setting in relation to the World Heritage Site, Green Belt and Area of Outstanding Natural Beauty are relevant considerations in terms of views from, across and into these designated neighbouring areas as acknowledged on page 3. Factors such as height, built form, building materials and roofing are all of great significance (acknowledged on page 6).

These proposals and aspirations are of such importance that we feel that B&NES should seek the help and support of ICOMOS and UNESCO at the earliest stage and accordingly we are sending a copy of this letter to these bodies. We are concerned to note that page 6 referring to Scale: height and massing states “ lends itself to a range of building heights”. This is weak and woolly, and in contrast to the section on Appearance: details and materials which is very much more specific. The Core Strategy will include guidance on heights. This Concept Statement should reflect this.

Page two notes that the site contains single storey blocks at present and refers to undeveloped natural areas to the east.

i) Should development be restricted to single storey? Certainly no more than two storey unless built into the hillside.

ii) The area to the east and north of the site is farmland where sheep presently graze. It is better described as an important 'finger' of countryside habitat following the path of the Kennet and Avon Canal and complimenting Kensington Meadows Nature Reserve on the opposite bank of the river Avon into the World Heritage Site; arguably an important juxtaposition and a significant contribution to the WHS setting particularly when viewed from the Camden and Fairfield hillsides. (see bullet point 4 page 3 and para 2 page 4).

iii) Historically, applications for developments on green fields further east towards Bathampton and between the Warminster Rd and the canal have been consistently refused.

Throughout the document there is a high reliance on transport infrastructure that minimizes car usage (let alone ownership). At present, the public transport is a poor and infrequent bus service. Mention is made of potential pedestrian/cycle bridging of the canal and railway which we would support, but is there not the opportunity to enable cycles and pedestrians to access the local areas of Larkhall and London Road (with its facilities, shopping infrastructure and many bus routes) via similar pedestrian bridges across the river Avon? Page 8's Supporting facilities statement would be in accord with this proposal.

We recall that UNESCO recommended competitions for Phase 2 and 3 of the Western Riverside development. We believe prospective developers should compete for these three different sites, (and that these should not be a monopoly provider). Any potential developer should be heartened by John Betjeman's observation that "oddly enough, in Bath, in an age of real civilisation, it was a developer who started the storyJohn Wood".

Points that arise from page 9 include –

- a) Arboricultural considerations – will the existing trees on the site and those in adjoining fields be protected? As they have grown, they help to blend the existing buildings into the hillside.
- b) Given the sloping topology, how much do these trees contribute to ground stability?
- c) Transport Issues – We repeat the point that public transport will need to be dramatically improved if car ownership by residents is to be discouraged.
- d) Historic Environment, including archaeology – i) Will any elements of 70 years' service to Bath and the Nation be retained for posterity? For example, what about the security lodges at the entrances to Foxhill and Ensleigh (echoes of the lamented Euston Arch!) ii) Re Archaeology, we have been told that numerous uncharted services and communication channels exist at Foxhill, such that excavations here have had to be 'by hand' rather than by heavy machinery.

We close with Betjeman's final phrase "...but still you have to admit that Bath with its mellow stone and elegant perspectives is the most beautiful Georgian City in England".

These MOD sites pose challenges but also wonderful opportunities.

Representation ID Number: 279 / 1

In considering the three collectively, there are shared issues which might form the basis of an agenda:

1. The statements are quite spare in their contextual and evidence-base referencing and as a consequence it is difficult generally to see how that evidence, especially as far as heritage significance of relevant assets is concerned, has been appropriately reflected in the concept proposals. Not quite leap-of-faith stuff but greater narrative would be useful.
2. This thought applies particularly to the fixed quanta of development outputs which are being promoted with little clear indication of how these have been determined in the context of what the sites can comfortably accommodate. We know from past experience how once embodied in such documents absolute outputs can become hostage to fortune provisions and taken as read by developers when calculating residual and development values regardless of what subsequent, more detailed, analysis might suggest are acceptable.
3. While not disputing the layouts they are quite prescriptive, and, again, it is not self-evidently clear how these represent an informed response to site constraints and necessary heritage considerations.
4. I note in one of the Nicholas Pearson reports that boundary planting can be seen as a mitigation to visual impact on WHS setting which might arise from development, but it also acknowledges that the creation of a meaningful tree screen takes time to grow. Such a feature in itself might also be seen as something of an alien presence, and so it is not necessarily appropriate to rely on such provision to justify or determine the form and level of development.
5. In terms of content overall, the documents seem to straddle both the broad parameters of a brief and the detail of a

masterplan or design framework while trying to embrace both the flexibility of the former and the prescriptive nature of the latter. I am not sure this results in an entirely comfortable outcome as there are tensions evident as the document gets pulled first one way and then the other.

6. But in principle, we have no objections to the sites being redeveloped for the sorts of uses envisaged. It is a matter of how this takes place!

Representation ID Number: 281 / 1

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England broadly supports the proposed concept statements for the Endsleigh, Foxhill and Warmister Road MOD sites. We are satisfied that the comments made in our letter dated 16th December 2011 (Our Ref: 39603) regarding landscape, ecology and public access have been adequately addressed.

We particularly welcome the requirement for well planned green infrastructure for all the MOD sites, which in our view will be essential to achieve the Council's aim for high quality residential areas that make efficient use of land, respond to the unique local context and integrate well with established neighbourhoods and communities. Green infrastructure planning for individual MOD sites will provide opportunities to contribute positively to the wider green infrastructure network to achieve greater benefits for people and wildlife, extending beyond the site boundaries. In this respect we expect the Council's emerging Green Infrastructure Strategy will set out a strategic framework, key principles, development requirements and relevant evidence to further guide design and site based master planning.

Representation ID Number: 310 / 1

I am writing on behalf of Bath Chamber of Commerce in relation to the Council's consultation on the future uses to which the three Ministry of Defence sites may be put.

Our members have noted the proposal to build houses on all three sites. It must be tempting to put as much residential on the areas in order to hit targets without the need for an urban extension. However, we believe the three sites offer such an unusual opportunity that a more imaginative approach should be taken. One issue for the Chamber is the amount and type of employment land being proposed on all three sites.

We believe that the proximity of Warminster Road to the University, along with its relatively good transport links, makes it potentially attractive for business. We have noted that some B1 space is being proposed, but we are concerned there will be little demand for offices at that location and therefore the consequence would be that in the long term the entire site would go for housing.

Our recommendation is that a combination of B1 light industrial and B2 employment space be established at Warminster Road. We recognise that would create issues for people living close by on the same site and therefore would propose that the whole site be given over to employment. The inclusion of B2 would be a boon to those existing manufacturers who are short of space and could potentially leave the district in order to find suitable premises.

The local economy is woefully short of light industrial space and warehousing and we are confident there would be demand for both.

We appreciate there could be an increase in traffic and care would need to be taken when it came to design, but are certain that these issues are not insurmountable.

Similarly the Ensleigh site, with its good links to the motorway, would generate demand from businesses, as would Foxhill, which could also provide provision attractive to the University and the kind of high end technical companies who would be drawn to an area which could easily become something of a science park. However, that would also require an adequate amount of car parking, which we acknowledge may be another point for discussion.

In short, we need to provide employment space to create a variety of jobs to produce a balanced and sustainable local economy which will benefit the whole community in the long term.

Representation ID Number: 904 / 1

The 2012 Quality of Life Assessment by Emma Clark of Exeter University, compared the Ashley Vale self build project with average housing localities. She found that satisfaction and trust are at almost 100% at Ashley Vale, about double the national average. Fear of crime was almost zero, unlike most places. Community building enables residents to know and trust all their neighbours; they help each other, socialise together, and enjoy living and bringing up families in a safe and friendly environment.

Under NPPF 2012 guidance, each LPA now has to identify the self build interest. Consultation must be effective to establish the true level of demand for custom build, not be a paper exercise with low expectations, and giving insufficient information for consultees to realise the whole range of options that could be included.

Avoid crowding in so many inhabitants that there is insufficient room for any houses with gardens for children to play, to grow veg, to allow for pets etc. Have a range of dwellings for a mixture of needs and abilities.

Representation ID Number: 1366 / 1

Network Rail has been consulted, by Bath & North East Somerset Council, on the Three MoD Concept Statements. Thank you for providing us with this opportunity to comment on this Planning Policy document. This email forms the basis of our response to this consultation request.

Notwithstanding the above: Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure. In this regard, please find our comments below.

Developer Contributions

The MoD concept statements should set a strategic context requiring developer contributions towards rail infrastructure where growth areas or significant housing allocations are identified close to existing rail infrastructure.

Many stations and routes are already operating close to capacity and a significant increase in patronage may create the need for upgrades to the existing infrastructure including improved signalling, passing loops, car parking, improved access arrangements or platform extensions.

As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements.

Specifically, we request that a Policy is included within the document which requires developers to fund any qualitative improvements required in relation to existing facilities and infrastructure as a direct result of increased patronage resulting from new development.

The likely impact and level of improvements required will be specific to each station and each development meaning standard charges and formulae may not be appropriate. Therefore in order to fully assess the potential impacts, and the level of developer contribution required, it is essential that where a Transport Assessment is submitted in support of a planning application that this quantifies in detail the likely impact on the rail network.

To ensure that developer contributions can delivery appropriate improvements to the rail network we would recommend that Developer Contributions should include provisions for rail and should include the following:

☐☐A requirement for development contributions to deliver improvements to the rail network where appropriate.

☐☐A requirement for Transport Assessments to take cognisance of impacts to existing rail infrastructure to allow any

necessary developer contributions towards rail to be calculated.

A commitment to consult Network Rail where development may impact on the rail network and may require rail infrastructure improvements. In order to be reasonable these improvements would be restricted to a local level and would be necessary to make the development acceptable. We would not seek contributions towards major enhancement projects which are already programmed as part of Network Rail's remit.

Planning Applications

We would appreciate the Council providing Network Rail with an opportunity to comment on any future planning applications should they be submitted for sites adjoining the railway, or within close proximity to the railway as we may have more specific comments to make (further to those above).

Representation ID Number: 1449 / 1

We are writing to respond to your consultation. The Council considered the three MoD concept statements at the meeting on 21st May 2012. The Council would urge you to ensure it is mixed use development as large employment spaces are being lost.

Representation ID Number: 2611 / 1

Transition Bath

Transition Bath is a local environmental organisation with around 1,000 supporters. Its aim is to help build a sustainable future by harnessing the power of community in the face of declining natural resources and increasing fuel and food costs. We support moving to a low carbon, local economy and building positive, self-reliant communities. We are involved in a wide range of local activities including the recent Bath Homes Fit for the Future project in partnership with BANES Council and Bath Preservation Trust.

In 2009 the council formally endorsed the Transition Movement, in particular agreeing to "consider through the Council's strategic planning ways in which the Council may assist in achieving the goals of the Transition Towns and Villages and the resource implications of doing so."

Bath's challenges

The Bath & North East Somerset region faces an unusual challenge, and one that is locked into its future development: to address the large proportion of energy inefficient heritage buildings within its housing stock, along with a rapidly ageing residential population and a worryingly high proportion of winter deaths. This situation demands a carefully designed response and recent events suggests some progress is now starting to be made.

Bath is responding to this and other environmental challenges through positive local action and particularly in the area of sustainability. This includes six successful DECC LEAF bids; the Energy Efficient Widcombe Project; the award winning Warmer Bath project offering guidance to energy efficiency in traditional homes; and the launch of Bath & West Community Energy, now the largest community energy share issue in the UK. In addition to these recent successes are the long-standing and popular Green Park Farmer's Market, several community fruit and vegetable gardening schemes, the FareShare food initiative, the Bath Oliver local currency scheme and the Chelsea Road walk to shops initiative.

Other challenges the region shares nationwide and in response to Government policy have a statutory obligation. In particular, the UK is committed to reducing its greenhouse gas emissions by at least 80% by 2050, relative to 1990 levels. The Council is also committed to reducing the area's carbon emissions by 45% between 1990 and 2026. This means all future development of the area's housing stock - from retrofit to new build, will need to start from the recognition that some 41% of the areas carbon emissions arise from residential energy use.

1 Planning and consultation process

A full 'Development Plan Document' has not been offered for public consultation. We believe this is an opportunity missed as it may have ensured instant weight and authority to the Council's influence over the development process immediately from its first inception. It is not clear what authority beyond simple guidance the Concept Statements will carry during this initial stage of the planning process. We are concerned that the haste to assist the MoD's site disposal process may put at risk some interests of the local community.

The MoD's dual need to dispose of the Ensleigh site quickly while at the same time as hold onto its Data facility there until 2018 appear at odds. We are concerned that this will put into conflict the smooth running of the development and

construction process at Ensleigh and fear that traffic access, site insurance, infrastructure development and project completion may be negatively impacted.

2 Energy

Energy conservation standards

All buildings should be designed and constructed to the highest standards of environmental and energy performance e.g. Code for Sustainable Housing Level 6 at the Ensleigh & Foxhill sites and Codes 5 & 6 at Warminster Road.

The Concept Statements suggest a Code for Sustainable Housing Level 4 at all the sites with a 'few' demonstration Level 5 & Level 6 properties. Code level 4 is only equivalent to the new Part L of the Building Regulations as required in 2013 and setting the standard this low would be an opportunity lost. We would recommend this be upgraded in the final document to specify Level 6 at Ensleigh & Foxhill, and a minimum of Level 5 at Warminster Road with the use of "Allowable Solutions" minimised.

There are a number of reasons behind our request for higher standards:

- a. Long construction period encompassing higher standards: the construction of these sites is likely to take place over a long period of time. For example, based on progress at Riverside this could be up to ten years. Once Planning Application and Building Regulation consent is given at the beginning of the project the properties are legally allowed to be built to that standard for the remainder of the development. A worst case scenario would be that properties built in 2022 would only need to meet the Building Regulation standard of the initial planning application as submitted some ten years earlier. We believe a higher standard should be required that would exceed the potential Building Regulations at the midpoint in the construction i.e. around 2017. This is likely to be Code Level 5 & 6 as currently being proposed for 2016 Building Regulations.
- b. Impact of land value & building premiums - less significant in near future: delivering properties to the highest standard generally costs more. If this can't be reflected in the sale value of the new properties this may reduce the land value and any return the MOD might make from selling the sites. We believe this potential reduction in land value would be minimal and meeting a higher standard would be in the interests of the community, something that the MOD is mandated to take into account when selling the land. Historical analysis of these costs suggests building to Code 5 & 6 is likely to increase building costs by between 5% and 30%¹ compared with a property built to Code 4. This has been used by the Building Industry to argue against compliance with these higher standards. However the costs are reducing rapidly as the volume of buildings built to these standards increase and the costs of renewables required to make properties more carbon neutral, for example solar panels, are also dropping rapidly². More recent analysis for example from Zero Carbon Hub suggests that by 2017 the added premiums will have halved to between £3000 and £8000³. We believe the council's supporting document⁴ to the Concept Statement which assessed the cost impacts by using higher standards, ought to have looked at these reducing future costs rather than basing them on 2010/2011⁵ costs.
- c. Need for Bath to meet the UK Government's 2050 80% CO2 reduction commitment: The UK Government has committed to reducing the UK's carbon emissions by 80% by 2050. This is a core issue for Transition Bath. In order to meet this commitment new homes will have to become carbon neutral to compensate for other sectors for example aviation, plastics and agriculture where it is much more difficult to reduce emissions to zero. The Bath area is going to struggle to meet this commitment because of the prevalence of listed Georgian properties. We predict that new developments in Bath may be forced to compensate for the older building stock and as a minimum will have to be built to carbon-neutral or even carbon positive standards.
- d. Retrofitting to a higher standard is expensive: once a property is built to a lower standard it is much more expensive to then have to upgrade it to a higher standard. We believe this cost is several multiples of the original cost. The usable floor areas of properties are often reduced if for example internal wall insulation is installed during a retrofit. In the medium to long term it may be more efficient and economic to develop to the higher standards to avoid significant additional expense of having to retrofit the property to meet 2050 standards.
- e. "Allowable Solutions" should not be allowed: this approach may allow developers to avoid meeting future carbon neutral building regulations by making offset payments, similar to carbon offset payments on airline flights. Developers are concerned with the extra costs to meet the new standards and argue it would be cheaper to invest in alternative carbon reduction schemes outside their developments. Typically this could reduce cost premiums by 70%. We believe this is short-

sighted because in the long-term the overall cost is likely to be far greater because of the need for retrofitting. Meanwhile the costs of making a building near carbon neutral are rapidly reducing

f. Other councils are specifying Codes 5 & 6 for other MOD site disposals: The requirement for Code 4 is weaker we note, than demands from other councils working in partnership with the MoD on land disposals, for example:

i. For the MOD Whitehill Bordon redevelopment, East Hants Council are specifying 6 all the houses are to be built to Code 6 standard: "All of them will be built to the Code for Sustainable Homes level 6"

ii. For the redevelopment of Devonport, Plymouth Council has required 7 that the majority of the housing should be Code 6. Given the wide support for sustainability concerns across Bath, matching if not exceeding the standards being set at other locations is an imperative. In the examples above their documents have either 'Core Strategy' or 'Local Development Framework' status and so provide more stringent guidance than those of BANES. We recommend this issue be addressed with urgency.

g. Developers believe Code 6 is unaffordable: A commonly held view is that it is economically impossible to build to Code 6. While this is a new and demanding standard there are enough precedents to illustrate its feasibility. Examples include:

- i. Parkdale in Castleford – where 91 houses have been built;
- ii. Mendip Road, Chelmsford – where 10 houses have been built;
- iii. Greenwatt Way, Slough – SSE showcase code 6 development.

An example of Code 5 commercial housing built close to home is the Darlington Wharf development adjacent to the Warminster Road site, recently completed by Emery Brothers Ltd. This is shown in the photo below:

This new-build terrace faced in local stone is designed to meet Code 5!

Renewables

Building houses to CfSH Codes 5 & 6 requires the use of renewables, typically solar PV, solar thermal and biomass heating. A unique opportunity arises here for co-investment by Bath West & Community Energy (B&WCE) the UK's largest local community renewable energy enterprise. This includes the potential to supply and finance solar roof panels and district-wide biomass heating, potentially offsetting some of the developer's costs in meeting CfSH Codes 5 & 6. For whole neighbourhood heating and electricity a CHP solution could also be considered.

We would also recommend careful design consideration is made in the control of heating and ventilation to these properties. A number of post installation assessments of mechanical ventilation and heat recovery systems, solar thermal 8 and air source heat pumps 9 have suggested residents don't clearly understand the system controls. As a result the predicted energy efficiency savings from such systems have not been achieved. Community based support for new residents would help improve the understanding of controls, and help ensure that heating and ventilation systems are used more efficiently. Alternatively the schemes could be supported by a 'Soft Landings' commissioning framework 10 to help occupiers understand how to best control and use their new homes.

It could be of immense benefit to the Bath community if the implementation of site wide energy monitoring and control systems is combined with research taking place at Bath University into Smart domestic building control systems 11.

3 Sustainable design, construction, commissioning and space use

Landscaping

Notwithstanding the requirement to build to BREEAM environmental standards, the landscaping solutions will require very careful consideration of climate change impacts e.g. low-water planting, use of sunlight reflecting surface materials and the avoidance of tarmac surfaces. With more dramatic weather patterns predicted, careful thought will be needed into designing how people move across these sites with regards to sun and rain, planting, personal security, night-time lighting and associated light pollution. UK rainfall patterns are causing problems with sudden high volumes of rainwater run-off that deluge city storm drains. Landscaped surfaces that are more porous, green roofs and walls that hold and release water slowly and water butts to help store rainwater for later use will all help mitigate some of the worst effects.

Non-domestic buildings

We recommend that all non-domestic buildings on the three sites be built to BREEAM 'Excellent' standard, and ideally target 15 credits under 'Ene 01', meaning the buildings are carbon neutral. Transition Bath has highly valued experience 12 in working closely with schools to reduce energy consumption. Based on this experience we know that once a school is

built its fabric is rarely upgraded, mainly because of the intermittent nature of school capital funding. The record clearly shows many Bath Schools built in the 1950s and 1960s have had no such upgrades. Any new school needs to be built to the highest standard from the start as it is unlikely to be retrofitted to a higher standard later and therefore unable to meet the 2050 80% CO2 reduction target.

In tandem with the construction of new buildings a Soft Landings¹³ commissioning framework to help occupiers understand how to best control and use their new buildings is recommended. A Soft Landings' approach means designers and constructors stay involved with buildings beyond their practical completion. This assists the client during the first months of operation and beyond, to help fine-tune and de-bug the systems, while ensuring occupiers better understand how to control and use their buildings.

Space standards

BANES council has no floor-area space standards for new dwellings. As a result developers are building properties in Bath which we believe are too small and may not be sustainable in the long term. There are a number of problems with building properties that prove to be too small:

- a. Transient population rather than a sustainable community: if properties are too small occupiers won't live in them for long periods and merely see them as a short-term stepping stone to a larger property that they are more comfortable living in. This makes it difficult to maintain a stable community if the population is constantly changing
- b. You can't predict future requirements: homes built today could last for generations. It is difficult to predict future domestic use patterns. Dwelling space that allows patterns of use to evolve over time is highly valued. Many in Bath live in Georgian flats not designed for 21st century living (they were built 200 years ago without bathrooms, kitchens, TVs, computers etc.) but they have been successfully adapted because space has allowed it. The average single floor Georgian two-bed flat conversion in Bath is some 80 square meters, which is adequate to allow flexible conversion and future adaptability. New dwellings with insufficient space may not stand the test of time.

Housing development in London is once again guided by 'Parker Morris'¹⁴ type space standards. These Bath developments must deliver houses of a fully functional size, suitable for long-term, sustainable habitation. We strongly recommend the adoption by the Council of the aims of the Transition

RIBA's 'Case for Space'¹⁵. The Council should target minimum floor areas of for example 60sqm for two-bed flats and 100sqm for three-bed houses. We would recommend the council incorporate domestic floor-area space standards into its Core Strategy documents.

Homeworking

Trend towards home working: there is an evolving trend to increased home working. We believe that many properties currently being built are unlikely to accommodate adequate space for desk based home working. Homeworking requires not only the opportunity to find space in the home but also reliable broadband services. Bath has a poor reputation in this regard. We see the scale of these developments as offering an excellent negotiating opportunity for the Council and its stakeholders to approach the telecommunications sector and improve the city's broadband performance.

Noise insulation between properties

Along with minimum space standards we think it important that high-quality acoustic insulation be provided between and within properties. Conflict over noise has a significant impact on community welfare. Combined with undersized properties it can lead to high turnover of occupants and general disharmony. We recommend developers pay careful attention to the issue of noise insulation.

4 Community and food

Shops and Cafes: Shops and cafes should be included at all sites. We note this is a significant omission from the current Concept Statements. These facilities should be community or at least locally owned, with food locally sourced and guidance could be given on where community facilities are located within the sites. A good model for such a facility is the community owned shop and café at Freshford.

The availability of local shops will have the benefit of reducing local traffic volumes as residents will not have to travel offsite for some of their shopping needs. Ideally everyone should have a shop for their daily needs within walking distance, a fact borne out by the Transition Bath, Chelsea Road survey. It is difficult to walk up from town carrying bags of shopping, particularly for the elderly and mothers with pushchairs. What must be avoided is for people to have to use a car or take

an expensive bus journey simply to buy a pint of milk or a newspaper, let alone some fruit and vegetables. Shops and cafes also act as social meeting places, particularly for the socially isolated e.g. the elderly and young mothers, encouraging a sense of community.

Allotments: We welcome the council's commitment to include allotments on all three sites. Allotments should be integrated with houses to help foster community interaction. The Concept Statements need to encourage developers to place allotments close to housing but not at the expense of cutting down private garden space.

We note that the allocation of space for allotments is consistent with BANES council's Green Spaces Strategy. At the same time we question whether there is sufficient for these sites and request that contingency plans be put in place should they be over-subscribed. The current space allocation implies about a half plot¹⁶ or 125sqm per 16 households and question whether this is enough. If full plots were allocated this would mean only 1 plot per 32 households. The housing densities of the sites look high, and may not leave much space for gardens. We suspect the allotments will be very popular on these sites. One option would be to set aside some of the allocation of 'formal open space' and 'natural areas' (which currently has ten times the space allocation of the allotments) as possible extensions to the allotments if the initial allocation is insufficient. From our awareness of the popularity of community orchards, a portion of the 'open space'/natural areas' could be allocated for this purpose.

How non-domestic buildings are integrated into the sites: the concept documents provide little guidance about how non-domestic buildings are well integrated into the sites. This may cause problems on the Ensleigh site if the MOD fails to release the space currently occupied by their data centre.

Integration of these sites into the surrounding community: little has been said in the Concept Statement about how these sites can be integrated into adjacent neighbourhoods. It is important that the views of the local community are taken into account in their design and layout.

Site layout principles that help foster community awareness and interaction should be encouraged. Research studies have demonstrated the paucity of community awareness reinforced by feelings of isolation arising from suburban style 'cul-de-sac' planning.¹⁷ More visibly open, movement-permeable layouts and allowing the sharing of space between traffic and pedestrians are proving more successful than cul-de-sacs in creating stable and secure urban neighbourhoods.¹⁸

5 Transport

Transition Bath promotes sustainable transport, with the objective of minimising fossil fuel consumption through encouraging investment in walking, cycling and public transportation. We feel that significant opportunities exist within these sites to promote sustainable transportation.

We feel the first priority should be to minimise the need to travel. This can be achieved by providing local facilities such as shops, cafes, community meeting spaces, workplaces and schools. A second priority, if there is a need to travel offsite would be to make this as sustainable as possible by trying to avoid the need to use gasoline powered vehicles. These not only create atmospheric pollution from dangerous Nitrous Oxides, particulates and greenhouse gas emissions, but contribute to noise pollution and congestion within town. Transition Bath seeks to encourage walking, cycling and public transportation on these sites and to discourage the use of petrol/diesel driven cars.

More detailed comments on transport is provided in the site specific section at the end of this document as each site has differing transport requirements. More general issues relevant to all these sites are discussed immediately below.

Provision of local facilities: Transition Bath welcomes the inclusion of new primary schools at Ensleigh and Foxhill. As discussed in Shops and Cafes in more detail, shopping and cafés should be provided at all sites to minimise the need to travel long distances.

Public transport: To encourage use of public transport, it needs to be cheap, convenient and frequent. In particular it needs to be more convenient than using private cars for trips within Bath. Encouraging this requires making bus stops readily accessible to residents and making car parking less accessible. This is likely to be a significant challenge for the Council and other stakeholder agencies to make travel between these sites and the city properly sustainable. Transition Bath supports an imaginative, shared response from all stakeholders.

Using parking arrangements to discourage car usage: We support the statement that “The layout shall be pedestrian and cycle dominant, with excellent public transport accessibility. A ‘shared space’ ethos for streets and spaces should prevail throughout the site”, while requesting clearer guidance on parking provision. In particular:

- We feel that the Concept Statements should provide stronger guidance in the provision and placing of car parking to prevent it dominating the street scape while encouraging children to play outside their homes – for example by keeping cars to the outer edges of the sites
- Parking allocation should be at a maximum of 1 vehicle per household at Ensleigh and Foxhill and 0.5 vehicles per household at Warminster Road
- Space should be allocated to ‘Car Club’ parking, to support the need for car ownership and to reduce the necessity for second car ownership
- Ideally car parking space should be paid for both on a capital and operational basis, this would skew the economics of car ownership towards public transport and ‘Car Clubs’¹⁹
- Reducing car parking provision has the additional benefit of making more space available for housing (larger floor areas) and communal spaces – allotments, natural areas
- Provision should be made for charging electric vehicles and high power cabling for when they become more common needs to be carefully considered – power should be available to all parking spaces

6 Local economy

While the Concept Statements allude to making provision for self-builders they lack specificity. They need to be more specific as to the opportunity afforded to local builders. Any provision for local involvement could be ignored once the land is purchased.

One of Transition Bath’s aims is to promote the local economy and we would like to encourage the council to ensure these developments will do the same. In addition to a role for self-builders we suggest that local architects and commercial builders should be given the opportunity to take a lead.

A minimum of around 20% or 240 homes we would suggest could be allocated to local developers and self-builders. This could assist local tradesman gain experience in low-carbon housing which would equip them for future developments elsewhere in the region.

We would also like the council to encourage developers to make generous use of the talents of local architects, engineers and surveyors. A design competition with the involvement of the local community could help ensure the success of the schemes.

Opportunities for direct community involvement are also possible. For example, a co-housing scheme such as the Springhill development in Stroud²⁰ in which a local community group was responsible for the financing, design and build of a group of houses and associated facilities may offer itself as one way forward. Some form of community enterprise in partnership with the development team may be a direction in which the Council sees an important and unique opportunity arising, facilitated through the supporters, contacts and volunteers of Transition Bath.

7 Site Specific Issues

Each of the sites has specific issues that need addressing separately:

7.1 Ensleigh

The Ensleigh site is the most isolated and has few local facilities. We suggest the following be included in the planning statements:

The provision of a local shop, café and community centre: there are no local shopping facilities in Upper Lansdown and the community centre is decrepit and on the periphery of the area.

The provision of a local shop and café would have two key benefits:

- I. To act as a hub for the community and reduce the need for residents to travel offsite, reducing traffic congestion both locally and down into the centre of Bath;
- II. To provide the current residents of Upper Lansdown with a new facility to help Ensleigh better integrate with its community.

We would encourage BANES council to support locally owned and run businesses and whose provisions are sourced from the local area. Major chains tend not use locally sourced food, an issue the Transition Bath Food Group²¹ is strongly

committed to addressing. The region surrounding Bath has excellent local food producers. A shop and café, with careful design could also be combined with a replacement community hall with the café using the space during the day and the community hall utilising the space in the evenings.

Provision of a primary school: Transition Bath welcomes the provision of a primary school, a facility currently absent from Upper Lansdown. It would reduce the need for residents to travel off site to take their children to school. Provision needs to be made to take pupils from the surrounding catchment area to the school either by walking or using the public bus service.

Public Transport: Of all three sites Ensleigh requires the most careful consideration for supply of public transport. It is the most isolated and has the least current provision.

For public transport to be well utilised it needs to be frequent and cheap. Unfortunately the no.2 bus which services the site only runs every ½ hour between 07:45 and 18:45 and is relatively expensive at £4.10 return. The Park & Ride bus service which runs along much the same route is cheaper at £3.00 and more frequent, running every 15 minutes between 06:15 and 18:45. However, it doesn't stop frequently enough along Lansdown Road to adequately serve residents. The ticketing systems between the services are incompatible so that you can't for example use a return ticket covering both services. As a result if you mix the services on the same trip you have to pay twice.

A better solution for the Bath community would be to combine the services and have a single service running three buses continuously up and down Lansdown Road, with frequent stops including one alongside the Ensleigh site. The service should also be provided at the same low cost (£3) available to Park & Ride customers or ideally should be subsidised down to £2 return which would encourage significantly greater take-up of the service by residents.

There also needs to be provision for a less frequent late bus running through to 23:00.

Cycling provision: While the provision of a cycle lane up Lansdown Hill is welcomed we would point out that the hill is very steep and is likely only to see use by the super-fit or those with electric bicycles. An alternative less steep route would help. Because of the steepness of the hill good provision for electric bikes should be made and mains electrical connections should be included on cycle storage facilities which we presume will be included with homes built to Codes 5 & 6.

MOD not releasing all the land making the layout of the estate difficult: as far as we understand the MOD may not be releasing a substantial part of the Ensleigh site until 2018. This land is occupied by a data centre at the centre of the site. If the MOD does not release this land promptly we are concerned that this may lead to serious compromises in the design and layout of the site as well as place the delivery date of the entire scheme in doubt.

7.2 Foxhill

Foxhill is the largest site while probably having the best existing local infrastructure with provision of public transport, local shopping and schools. Our comments on the Foxhill proposals are:

- Primary School provision: This needs to be thought about carefully as Combe Down School is very close by, but has a very small site with limited opportunities for expansion and very poor and unsustainable existing fabric²². Rather than splitting the school campus between a new school at Foxhill and the existing site it might be better to build a single larger more sustainable (BREEAM 'Excellent') school at Foxhill in exchange for council owned land being made available for housing on the Combe Down School site.
- No provision for cycle lanes: The background document on transport provision at Foxhill states "The specific provision of cycle lanes along Bradford Road as part of any scheme has been considered but is not considered desirable" it explains that this is not possible because of parking provision on Bradford Road. We would suggest the council consider looking at the options for provision of a cycling lane on Bradford Road again as only a short section of the road provides parking bays and the road may indeed be wide enough to support cycle lanes.

Cycling and Walking Routes: We welcome the idea of walking and cycling routes into the town centre via Perrymead, Prior Close and Popes Walk. Careful thought will be needed in their detailed design.

7.3 Warminster Road

Warminster Road is the smallest of the sites, is within walking distance of the centre of town and is visually sensitive. Our specific comments on Warminster Road are:

- Visual Impact: the Warminster Road site is visible from much of the northern side of Bath and as such will have a much more visible impact on the cityscape of the Bath World Heritage site than the other sites. We support the view that the proposed tiered north-south orientation would allow all residents good views across the valley. This would have the additional benefit of providing south facing roof spaces for solar PV and solar thermal panels which would not be visible from across the valley. It may be possible to achieve Code 6 housing for Warminster Road.

School provision: There is currently no additional school provision proposed for Warminster Road. The local schools Bathwick St Marys and Widcombe Infants are the most popular and oversubscribed (by a factor of almost three²³) schools in Bath. The likely consequence, if no additional provision is made is that primary school children would have to travel even further than they have to do today to get to school, increasing pollution and congestion in the local area. As part of the evidence base for this scheme we would be grateful if the council could explain how provision for primary school children will be achieved?

Representation ID Number: 2673 / 1

Introduction

I have written a common response for all three consultation documents. I have two principal concerns regarding building mix and density.

1.0 Building Mix

1.1 Self Build

The three sites provide a rare opportunity to establish an innovative and market leading self build/ custom build development similar to the bold initiatives currently being rolled out in Almere, Holland and other continental locations. Whilst the references to self build made in the documents are to be applauded they are loosely worded and open to circumvention by developers. The requirement for 10% of the housing to be self build or zero carbon does not lock in self build and is too small a proportion.

Consideration should be given to pooling the self build provision into one area which would probably be best located in the largest site at Foxhill. An area of say 6 hectares would represent 25% of the total housing area across the three sites and would provide circa 300 self build plots.

The DCLG is heavily promoting custom build houses – their definition is “Homes built or commissioned by individuals or groups of individuals for their own use, either by building the house on their own or working with builders.” The DCLG recognises that custom building adds £33bn of value to the national economy, is an important contributor to housing supply, gives market diversification, provides local jobs and a local construction supply chain. Custom building gives local choice and better value for money – especially it gives scope for housing to be more affordable for a new generation. Custom building is localism in action.

Some niche developers are starting to offer serviced plots when they cannot raise sufficient funding to build houses out, in the current climate. Two developers have found demand to be unprecedented, and say they will continue to offer serviced plots, with the option of doing as much or as little of the construction work as is required of them. Their clients fund their projects with staged mortgages, savings, and sweat equity, as appropriate.

The 2012 Quality of Life Assessment by Emma Clark of Exeter University, compared the Ashley Vale self build project with average housing localities. She found that satisfaction and trust are at almost 100% at Ashley Vale, about double the average. Fear of crime was almost zero, unlike most places. Community building enables residents to know and trust all their neighbours; they help each other, socialise together, and enjoy living and bringing up families in a safe and friendly environment.

1.2 Live Work

It is disappointing that no provision has been made for Live/Work units. With modern communications home working and home based businesses are becoming more and more common. However most houses do not provide an ideal environment because of the difficulty of keeping family life and work life separate. I would suggest that Live/Work should be added to the mix.

2.0 Density

Using the published figures and making some educated assumptions about the land take of the B1 and the schools I estimate that the following densities are implicit in the documents:

Ensleigh - 56 dwellings/ha
Foxhill - 60 dwellings/ha
Warminster - 24 dwellings/ha
NB. All figures are net densities

The disparity between Ensleigh/ Foxhill and Warminster is odd and has no apparent rationale. There is no contextual reason why Warminster should be so low. If anything it should be Ensleigh that has the lowest density because of its semi rural context.

Conversely Ensleigh and Foxhill are in my opinion too high for their settings. I would therefore suggest that the densities are evened out across the three sites. A common density of 50 dwellings /ha would deliver the same total number of units and would relieve the pressure on Ensleigh and Foxhill.

Of the three sites Warminster would seem to have the highest land value per hectare because of its location and amenity. Increasing the number of units will therefore realise a higher development value.

Representation ID Number: 2777 / 1

Bath and North Somerset are producing the Concept for the Ensleigh site, but it is not at all clear who owns the land. I understand that when it was requisitioned in the early 1940s there was an agreement that the land would be returned to the owner when the MoD eventually vacated the site. If this is so has this action been taken and is there now a clear understanding as to ownership?

The Concept Document suggests that BANES are looking to have 350 dwellings built on just 7Ha (10.3Ha for the total MoD Ensleigh site less approximately 3.4Ha for open spaces, employment floor space, allotments and a primary school.) Which means that the average 'foot print' per dwelling is only about 225 square metres, assuming that the 70 flats are two storey. When one concedes that this area includes not only the dwelling but garden space and associated roadways, 350 is not a realistic number of dwellings to build on the MoD site alone. Perhaps this is why there are hints throughout the documents that the proposal would be much more viable if all, or part, of the Royal High School and Kingswood School playing fields could be acquired for this development.

Representation ID Number: 2781 / 1

Similar to Lansdown Ridge built by Charlcombe Homes
Make Collier Lane one way

A shop is essential
A Doctors surgery would take the pressure off Fairfield Park
It would be preferable to have social housing on the West Side of the site
The entrance from Granville Road would be better further along from the present entrance
There should be at least 2 maybe 3 entrances into the site.

*we are moving to the area in 2013

Representation ID Number: 2782 / 1

No high rise development
No industrial use
Be aware of limitations of existing road system

Representation ID Number: 2784 / 1

It amounts to a whole new village, complete with its major impact on the area.
Any building should be kept at LEAST 30 metres back from Lansdown Road, behind at least 20 metres of dense planting.
The sketch proposal shows a potentially flimsy triangle of trees along Lansdown Road about as much use as a chocolate tea pot.

Representation ID Number: 2790 / 1

As the immediate neighbour to the E Block car park we will be initially the most affected.
We would appreciate being formally notified as events develop.

Representation ID Number: 2792 / 1

Too many people not enough transport. Building for years with all that involves.

Representation ID Number: 2793 / 1

Compatibility with its surroundings is the overriding requirement

Representation ID Number: 2794 / 1

Alarmed at the prospect of more traffic on Lansdown Road which is already a problem

Representation ID Number: 2841 / 1

We would value a small supermarket such as Tesco express on the site. Our main concerns are with the increased traffic flow down Lansdown Hill and with the preservation of the skyline.

Representation ID Number: 2842 / 1

I would not like this site to be extended beyond the existing MoD site. I would not like the suggested built environment to turn the site into a version of the development at Peasedown St John.

Representation ID Number: 2843 / 1

I support low density housing and office space together with primary school and open green areas but strongly oppose any extension into the surrounding playing fields which would have a detrimental effect on the environment.

Representation ID Number: 2844 / 1

Accept low density housing and open green spaces but oppose extension into surrounding playing fields

Representation ID Number: 2847 / 1

Primary concern is traffic, especially up from Charlscombe. While most MoD traffic will disappear that was at limited times. If new residents want to get to shops in Larkhill off on London Road they will probably use that narrow lane. (Solved partly if shops are on site). NEXT MAJOR CONCERN IS SKYLIGHT EFFECTS.

Representation ID Number: 2852 / 1

Being located in different areas of the city, the Foxhill, Warminster Road and Ensleigh sites each have their own individual environments. The redevelopment of each therefore requires its own individual attention and choices. In my opinion the redevelopment of Ensleigh must be focused on quality, not quantity, in order to harmonise with that which is already in place.

Representation ID Number: 2853 / 1

We should like to see this area developed with regard to the whole community of Lansdown in mind, to make it a destination one might WANT to visit therefore community facilities/green spaces/allotments/work opportunities. Great to have a small shop as well.

Representation ID Number: 2857 / 1

"Foxhill, Ensleigh, Warminster Road Sites.

Bath is very congested with traffic. Building on Foxhill and Ensleigh sites will just increase this congestion. People do not use public transport. Adding to the problem of pollution. Warminster Road site is within walking distance of the city. Having low cost housing on the site will help people joining the housing market therefore more suitable. My suggestion is making Foxhill Site a wildlife area connecting to Priory Wood already adjacent to site. A celebration in honour of the Queens Jubilee and a leisure area for residents and visitors to enjoy. In the future Ensleigh site could have a similar format

as Foxhill Site. I know residents of Bath enjoy seeing green hills and trees on the skyline of the city. Hoping this will be considered."

Representation ID Number: 2858 / 1

I would like to support - as was in a letter in the Chronicle a few weeks ago - that serious consideration should be given to make Ensleigh site available for Bath Rugby Club.
It is terribly cold to live up there presumably the rugby players could stand that!

Representation ID Number: 2864 / 1

It is important to control the increased traffic flows, with the use of more public transport. Shops and a surgery would help reduce traffic flow to the city.

Representation ID Number: 2867 / 1

Water - where is provision to be made to store sufficient water at sufficient height to provide for this development on top of Lansdowne?
We are concerned about the increased use of Colliers Lane and Weston Lane in particular and increased traffic in general
We also consider the lack of a PO/shop and other community facilities a serious problem
We don't like 'expansion creep' beyond the MOD site, not desirable!
This 'affordable' housing is a good idea, but need to know how that is defined.
Toad migration in Charlcombe is a nationally important event - bearing in mind that Charlcombe lane is restricted for 6 weeks every year, this will have consequences for traffic in Colliers lane

Representation ID Number: 2868 / 1

Lighting - this is a very visible site, great care must be taken with lighting.
Could there be a small surgery?

Representation ID Number: 2875 / 1

Just 2 points to make.
- Do the plans suggest a compulsory purchase order would be sought in order to incorporate the existing playing fields?
The owners of the land are referred to in the draft concept statement. This would seem to double the size of the Ensleigh site.
- A plea for lots of tree planting to improve a very bleak site.

Representation ID Number: 2879 / 1

Please could you consider the implications of putting social housing this far up the hill. People on benefits with children will not be able to afford multiple trips into town for shopping/doctor/schools. The cost of public transport should be addressed. Bath CAB would be happy to discuss what clients on benefits could afford.

Representation ID Number: 2880 / 1

Very concerned about the road support structure and the effect on Charlcombe Lane which is in a conservation area!!

Representation ID Number: 2892 / 1

The present playing fields support an abundance of wild life. There is a badger sett, a family of hares (2 were born this spring), wild orchids and cowslips. There are also numerous sky larks, bats and deer.

I feel the council should not be recommending the possible future development of these sites as we would end up with not so much a new development more likely a new town.

Representation ID Number: 2893 / 1

Minimise the amount of new housing.

Low rise development

Representation ID Number: 2899 / 1

Minimise the amount of new housing.

Low rise development

Private housing to be detached.

Representation ID Number: 2907 / 1

DRAFT CONCEPT STATEMENT FOR THE ENSLEIGH MOD SITE
CHARLCOMBE PARISH COUNCIL COMMENTS

The sale by MoD of Ensleigh represents a unique opportunity to redevelop a site which is extremely unattractive visually, has no coherence with the local residential development and is surrounded by an ugly security fence. It also provides a much needed opportunity to create additional housing within the city of Bath. Redevelopment is therefore to be welcomed. However, the site is very sensitively located and great care must be taken to ensure that the development ties in visually with its surroundings, particularly in terms of height and massing. Traffic considerations, especially the impact on the local lanes in Charlcombe, will need close attention. Charlcombe Parish Council has a particular interest since the Parish borders Ensleigh to the north, south and east.

Need for a Holistic Approach across all 3 MoD Sites

Whilst each of the 3 MoD sites being offered for development is located in a different area of Bath and each has its own individual constraints and characteristics, it is suggested that B&NES should be adopting a holistic approach across all 3 sites to ensure that the collective development delivers the overall vision and requirements. Each site has its own individual Concept Statement, but there is no overarching top level Concept Statement setting out B&NES' vision for the totality of all 3 sites. What is lacking is a top level Concept Statement which should set out key parameters for each of the 3 individual site statements.

Selling off in Tranches

Selling off Ensleigh in tranches (at least 3 under current proposals) over a number of years risks a lack of coherence in the final result, particularly if several developers are involved. How will B&NES ensure that the site is developed as a single coherent entity?

Need for a Spatial Study

We see the need for a spatial study as an essential element of the concept. The Concept Statement states that there will be 350 homes and 2000 sq m of B1 employment space plus 3.3 ha of open space, natural areas and allotments, plus a primary school. But there is nothing in the Evidence Base to show that all this will fit onto the site, particularly in view of building height constraints. If a spatial study has been conducted, it should be included as an essential element of the Evidence Base, and should inform the draft Concept Statement. If a spatial study has not been yet been undertaken, it is suggested that this should be done as a matter of priority before the draft Concept Statement is finalised.

Integration into the Local Community

We see it as essential that the Ensleigh development integrates with the local community rather than existing as a separate enclave. It will provide the opportunity to include facilities in the development which would benefit the wider Lansdown community – for example a post office/shop, surgery and community hall. Lansdown currently lacks such facilities despite having a sizeable population, meaning that residents have to travel into Bath. The provision of such facilities in the Ensleigh development would save journeys into Bath, reducing the impact on traffic and transport.

Visual Impact

The MoD Ensleigh site sits on the northern ridge of the city above Charlcombe. The site is highly visible from many viewpoints around Bath and borders the Green Belt and Cotswolds AONB which lie to the South, East and North. The site is thus highly sensitive in relation to both the World Heritage Site setting and the Green Belt/AONB setting. Whilst the Evidence Base and Draft Concept Statement place emphasis on these constraints, the area of the MoD site to the South of Granville Road, the first to become available for development, will need especial care since it forms by far the most visible part of the skyline. As the Concept Statement notes, the existing MoD buildings are single storey and the height and massing of any new buildings in this area of the site will need particularly careful consideration; indeed it is very

questionable whether any buildings of more than one storey high would be visually acceptable on the site to the south of Granville Road. Whilst the Nicholas Pearson Associates report in the Evidence Base addresses the issue of visual impact in some detail, this does not appear to be adequately reflected in the draft Concept Statement.

Special emphasis should be given to the planting of trees to soften the visual impact of the site and to provide screening, something that has been notably lacking during the long history of MoD ownership. Although tree planting is mentioned on page 8 of the draft Concept Statement, it is suggested that this aspect needs considerable strengthening.

Renewable Energy

It is noted that an energy strategy is required to reduce consumption and promote the use of renewables. Although not specifically mentioned, wind turbines to provide wind generated power would be visually inappropriate and unacceptable in this sensitive location and Charlcombe Parish Council suggests that the Concept Statement should include a statement which clearly rules out the use of wind turbines. If biomass energy is to be considered, it will be important to ensure that any chimneys associated with biomass boilers are kept to an acceptable height to ensure that they do not have an adverse visual impact.

Expansion beyond the MoD Site

It is noted with concern that page 5 of the Draft Concept Statement identifies land to the north and west of the MoD site (playing fields) that could form an enlarged area for development to “enable a bolder vision to be generated”. This is seen as nothing more than development creep and the desire to squeeze in an increased number of houses. Charlcombe Parish Council strongly believes that the Concept Statement should confine itself to the MoD site and should not be looking for further expansion simply because the adjacent land does not have the constraints of Green Belt/AONB. If the existing playing fields have to be moved elsewhere on Lansdown, which would be within the Green Belt and Cotswolds AONB, the associated infrastructure such as replacement sports pavilions and lighting will generate further inappropriate development in the AONB.

Affordable Housing

The document identifies that 35% of the new homes on site will be “affordable housing”. The need for affordable housing in Bath is well recognised and fully supported. However, it must be noted that Lansdown is an affluent area of Bath, with the majority of new housing being large and expensive, including the latest developments to the south of Granville Road, adjacent to the MoD site. Developers will undoubtedly wish to maximise profit by building as large and expensive housing as possible. “Affordable Housing” needs clear and precise definition in terms of the Ensleigh development if the developers are to be constrained effectively.

Traffic and Transport Issues

We are especially concerned about the high level of additional traffic flows that the new site will necessarily create, with 350 new households regularly travelling to work, school, shops, and other local facilities. Rat-running through local lanes (in particular Colliers Lane, Langridge Lane and Charlcombe Lane) could well reach dangerous and intolerable levels, when combined with the existing high levels of traffic at peak hours. Greater emphasis and clarity needs to be placed on how transport arrangements for the new development will be controlled and managed, including the provision of adequate, reliable and efficient public transport and safe cycling facilities, and limitation of traffic flows in adjacent narrow rural lanes.

In particular, there will be a significant impact on Colliers Lane and the bottom end of Charlcombe Lane from increased journeys (eg school runs, shopping in Larkhall, access to the A4 and routes to the East). This will extend throughout the day, unlike the MoD commute which was in one direction only for a limited time in the morning and evening. There will in future be more traffic throughout the day. Colliers Lane and Charlcombe Lane are narrow rural lanes with a 20 mph limit and are not wide enough for 2-way traffic in many places, particularly at the lower (Larkhall) end. It is noted that the Evidence Base talks of a TRO to restrict the use of Colliers Lane. But closing Colliers Lane to through traffic will simply divert traffic down other country lanes, in particular down Lansdown and into Charlcombe Lane. If Colliers Lane was to be made “Access Only”, the same would therefore need to apply to Charlcombe Lane which has been designated a “Quiet Lane” but which already carries heavy traffic at peak hours.

It is recommended that the opportunity is taken to rationalise the current plethora of speed limits along Lansdown Road (30/40/60/50 mph). In particular, the junction between Granville Road and Lansdown Road, and the proposed new

roundabout at the new main entrance to the site, should be within a 30 mph limit, not 40 mph as at present. There is also the need for a pedestrian crossing across Lansdown Road, ideally just to the north of the Granville Road junction.

It will be very important to provide frequent public transport services from Ensleigh into both Bath and Larkhall – a new service to Larkhall will be essential if traffic using Colliers Lane is to be kept to acceptable levels. Moreover, no reliance should be placed on the Lansdown Park and Ride buses which are there principally to serve those coming from outside Bath and which will become more heavily used once Lansdown P&R has been expanded.

As the Evidence Base acknowledges, the development of Ensleigh will result in more traffic using Weston Lane. This will reinforce the need for traffic control measures, such as a roundabout, at the busy and dangerous junction between Weston Lane and Lansdown Road, in particular for cars turning right out of Weston Lane onto Lansdown, which is the direction that cars heading for Ensleigh will take.

Finally, the development of Ensleigh provides a timely opportunity to re-examine the case for a dedicated bus service from Lansdown Park and Ride to the RUH, along similar lines to the No 42 service which operates from the Odd Down P&R. Charlcombe Parish Council made this proposal in 2009 but it was turned down on cost grounds.

Foot/Cycle Path along Lansdown

The draft Concept Statement states that the layout of the site shall be pedestrian and cycle dominant. With this emphasis on walking and cycling, it is suggested that the footpath along Lansdown Road heading north could be improved and extended with the creation of a footpath/cycle path along the length of Lansdown to link the Ensleigh site with Sir Beville Grenville's Monument. The verges are of a sufficient width to accommodate a footpath/cycle path. This could form an element of the "green infrastructure" provision, and would be a highly beneficial amenity.

Lighting

The existing MoD security lighting has a negative visual impact, generating an orange glow on the skyline. The lighting associated with redevelopment needs to avoid sky glow and light spillage and, with careful planning, could significantly improve the existing situation.

Toad Migration

Each spring a large number of toads, frogs and newts migrate from the Lansdown hillsides down the hillside below Ensleigh, across Charlcombe Lane and down to the lake and streams which lie below. Charlcombe Lane is closed annually for 6 weeks during the migration season (February/March) and the Charlcombe toad crossing is recognised as one of the country's major migration routes. Care must be taken to ensure that development at Ensleigh does not have any adverse impact on the toad migration. The annual closure of Charlcombe Lane is also an important factor when considering traffic restrictions in Colliers Lane, which becomes the diversionary route.

Engagement with the Local Community

Charlcombe Parish Council notes that applicants are expected to engage with local communities in shaping their proposals. As the Parish which borders 3 sides of the development site, Charlcombe Parish Council would ask to be appropriately consulted at all stages and we look forward to constructive engagement as the proposals progress

Representation ID Number: 2909 / 1

As mentioned in the first section the demolition of MoD Ensleigh offers a unique opportunity to provide a large area of unspoilt recreational land such as can be found a Savernake Forest or Alfred's Tower. This opportunity must not be passed up in the pursuit of yet more housing in the congested Bath/Bristol area.

The council should take note of the vast swathes of countryside swallowed up at Syston Common and Filton in North East Bristol, and (closer to home) the significant encroachment of housing and major roads on the slopes of Solbury Hill to the East of Bath. In-filling (new building crammed into existing gardens and green spaces and the Kingswood school sports hall) also continues in the Lansdown area at an unchecked pace, while the Bath Council's continuing failure to enforce illegal development at Woolley inspires little confidence that anything in the developers plan will be adhered to let alone enforced.

Representation ID Number: 2911 / 1

We believe that it is of vital importance not to extend the housing development beyond the site presently lineated as MoD. Some form of guarantee that this will not be exploited would be politically sensible.

Representation ID Number: 2914 / 1

A major concern is the suggestion that the 2 playing fields adjacent to Enleigh may be incorporated into the plans, especially the Kingswood field. Building here will make the built up zone much too large, and out of proportion with the opposite side of Lansdown Road. This is perhaps the most attractive approach to the World Heritage City, set in an area of Cotswold AONB, which could be seriously damaged by this whole development and particularly so if extended into the playing fields.

Representation ID Number: 2920 / 1

Whilst in general not against development of the site I do have a number of concerns which I hope the planners take into consideration. Others will cover much better than I can the visual impact on the approach to Bath, transport, expansion beyond the current site.

My main concern is the visual impact on the skyline particularly viewed from the south and south east of the site and in particular to use your words "the scale and massing adjacent to the ridgeline".

You can see from the attached photo 1, that currently the MOD buildings are hardly visible. This is because they are set back from the boundary and single story flat roofed. Towards the east of the site where the buildings are situated further back from the ridgeline with an amenity area in front of them they are not visible in the photograph.

Presently the view is rural, fitting in with its status as part of a world heritage site AONB and green belt. If the skyline is developed this rural setting of the upper Charlcome valley will be completely destroyed and instead resemble a seaside apartment development. This can be seen on the western end, left, of the skyline in photo 1 (close up in photo 2). Here development of the Enleigh Lodge site has been allowed to creep down the hillside and instead of green fields the view is of concrete. If this was permitted all along the ridgeline it would completely alter the character of the area for ever.

I hope therefore that any new development will be set back from the ridge line and be of a height that does not intrude upon the current visual amenity of this important and irreplaceable landscape.

Representation ID Number: 2923 / 1

Landscape and Views

The recently (2011/2012) housing development on land to the east of Granville Road is visible from the Cotswold AONB to the southeast and thus having a negative impact on the local landscape and more distant viewpoints.

The plot of MOD land forming the corner between Colliers Lane and Granville Road has already been sold to a property developer for up-market housing. Any new housing must be both set back from the boundary of the AONB/green belt and also have a restriction on the elevation, in order to avoid any further visual impact from viewpoints to the south and east of the site.

Extension of Development into Land to north and west of the MOD site

The draft concept statement makes reference to 'additional opportunities that there may be in areas adjacent to the site'. It then makes reference to extending the development into land which is located to the north and west of the site, currently used for playing fields.

However, the overall consultation is branded MOD Enleigh, NOT adjacent playing fields. I do not support this wider development which will have a much greater impact on the area in terms of traffic, landscape and views from the approach into Bath. In terms of sustainable development, I believe a development on the MOD site only, could still support much the needed improvements to the bus network, footpaths and other necessary infrastructure.

The playing fields will need to be relocated, which may well result in further extension of the northern urban boundary of Bath and thus extending the area lit at night with associated light pollution. Currently the playing fields are accessed on

foot from the local schools, walking may not be an option if the playing fields are moved to a more distant location.

Additional Traffic

There is no doubt, that a housing development will significantly increase traffic along the Lansdown Road. This could be mitigated somewhat by improving the bus service, which is poor in this area. But there will still be more cars. Unless preventative measures are taken, Colliers Lane will become worse commuter 'rat run' than it currently is, as residents in the new development will use Colliers Lane to access the A4 east and A46. The road can only cope with very local traffic, and to undertake major improvements to the highway would be detrimental to the rural area and the AONB.

Representation ID Number: 2927 /

Overall, I accept that the MOD site will be re-developed & many of the principles BANES have outlined for that initiative seem sound. However, I OBJECT STRONGLY to BANES encouraging development of the playing fields adjacent to that site. Along with my husband & my neighbours I want BANES to amend its plan for the site by removing all wording that encourages development of the playing fields. Furthermore we would expect BANES to protect us from any proposals for such a development should they be applied for.

Representation ID Number: 2948 / 1

I have always (over many years) understood that the Admiralty had agreed to return the MOD site land to its previous owners in its original green state when vacated.

I have many times heard over the years that the Royal School playing fields were a charitable gift to the school for the purpose of sport, and believe it is important that the arrangements under which the land was made available to the Royal School be made public, since it is possible that the Royal School may not be in a legal position to sell the land at all.

For clarity's sake, BANES should first of all and without delay insist that the MOD and the Royal School make public the details of their agreements when the land was made available to them.

Subject to clarification on the above two points, I lay out my further comments below:

I am concerned that BANES, in the Draft Concept Statement, sets housing and massing targets (350 homes and 2000 sq m of B1 employment space plus 3.3 ha of open space, natural areas and allotments) apparently without having the benefit of a spatial study. I am not convinced that all this will fit onto the site, in general, but particularly given the building height constraints on the site.

I am extremely concerned that the BANES Draft Concept Statement encourages developers to think in terms not only of the MOD site itself, but also of the two playing fields. It states that "land to north and west of the MOD site boundary is not in the Green Belt, nor within the Cotswold Area of Outstanding Natural Beauty" and " This enlarged area provides the potential opportunity to enable a bolder vision to be generated..." This is a deliberate encouragement of urban creep. It would in fact double the size of the actual MOD site. It would double the visual aspect of urbanisation perceived by motorists approaching the historic City of Bath along Lansdown Road, and also by neighbours to the north, south east and west. A development on this scale would create a new town the size of Larkhall. The fields may not be designated AONB and Green Belt but they are entirely surrounded by AONB and Green Belt, and the whole site is visually and historically sensitive since it lies at the very historic access point to the City of Bath, and entirely within the World Heritage Site.

I have the strongest possible objections to this development creep. We believe it is BANES' responsibility, and in the interests of current residents around the site and future residents within the MOD Ensleigh site, to safeguard the quality of this landscape, keeping the playing fields as a valuable amenity for all local residents and walkers, as well as for the schools.

I consider the preservation of the Green Belt and AONB surrounding the site to be of the utmost importance. I am extremely concerned that if the two playing fields adjacent to the MOD site are developed, then the temptation will be to shove sports facilities, pavilions, car parks directly into the Green Belt and AONB.

On the page headed "Design Principles", under "Layout", the Draft Concept Statement states that "The Layout will be expected to exploit opportunities to create new views and juxtapositions, which will enhance the character of the city". What does BANES mean by this? We have already seen buildings being built on the East side of Granville Road which are

too tall for their location, and therefore in full view of Charlcombe and the valley below, and all the way from the A46. It is unavoidable that the creation of any “new views” will inevitably be in full view of the Woolley/Swainswick valley, in this sensitive AONB. Development should respect the requirements of the AONB and keep building heights below levels which can be seen from without, and with sufficient screening. Careful measures, with regard to the height and style of buildings and to adequate screening, are required in order to protect the integrity of these views from the historic environs of Bath.

I am also concerned about the inevitable increase in night light pollution and unsustainable additional traffic implicit in this proposed development.

Water Pressure in the area is already feeble. The effect of a large volume of additional water demand will require additional water towers. In this sensitive location, we are concerned about where these are to be placed without visually impacting the area.

I am concerned about the haste with which BANES is pushing this forward, particularly in view of the apparent lack of any spatial study.

I am concerned that a planned three-stage sale of the MOD site is bound to lack harmony. It is not in the site’s best interests to have 3 piecemeal one-off bits of development as this is not likely to lead to a well-structured comprehensive plan, based on an integrated overall plan, where everything works together in the long term. It is more likely to be very prone to real problems of integration further down the line

Representation ID Number: 2950 / 1

Make the whole site a bespoke and sustainable design with a high priority for self build. No speculative mass housing. High quality housing designed and built using only local architects, consultants and builders who thus have a better knowledge and understanding of the site. This is a more cost effective strategy that also creates local employment, investment and money in the locality. A good mixture of residential based uses, such as local shops with accommodation above and houses that encourage home working and thus a solid basis for a vibrant community is created. Modern and contemporary designs of our time rather than pastiche copies of the past.

Representation ID Number: 2951 / 1

I have always heard that the original agreement with the Admiralty was that the site would be returned to its previous owners in its original state, when the Admiralty had no further use for it.

I have also always heard that the Royal School received the playing fields as a charitable gift, and believe the agreement would not have empowered the Royal School to sell the fields for development..

I would ask BANES to obtain from the MOD and the Royal School details of the agreements under which the land was made available to them, and make these public.

Subject to clarification on the above two points, I lay out my further comments below:

I am concerned about the housing and massing targets (350 homes and 2000 sq m of B1 employment space plus 3.3 ha of open space, natural areas and allotments) set out by BANES in the Draft Concept Statement. BANES make no mention of having commissioned a spatial study, and I believe it is imperative for a spatial study to be undertaken, so that targets can be based on proper research. I believe BANES’ targets are over optimistic, particularly given the building height constraints on the site.

I am extremely concerned that the BANES Draft Concept Statement encourages developers to think in terms not only of the MOD site itself, but also of the two playing fields. This is a dangerous encouragement of urban creep, and this amount of land, in addition to the MOD site itself, would double the size of the development at issue, which I believe is excessive and inappropriate. The current urbanisation (MOD) on Lansdown Road at the approach to the City of Bath would be doubled. Neighbours and walkers in the AONB and Green Belt to the north, south east and west would suffer a considerable loss of amenity. The fields in question may not themselves be within the AONB and Green Belt but they are surrounded entirely by AONB and Green Belt, and this site is very sensitive lying, as it does, not only at the historic approach to the City of Bath, but also entirely within the World Heritage Site.

I believe that BANES have a duty of care, in the interests of current residents around the site and future residents within the MOD Ensleigh site, and should the development of the MOD site go ahead, to safeguard the quality of this landscape, keeping the playing fields as a valuable amenity for all local residents and walkers, as well as for the schools.

The preservation of the Green Belt and AONB surrounding the site is vitally important. I consider it irresponsible for BANES to encourage developers to get the schools to site replacement playing fields on agricultural land so that they can develop the existing fields, since this will mean that not only sports facilities but also, pavilions, car parks etc will be forced directly into the Green Belt and AONB.

The visual impact of any development would need to be constrained better than has been achieved at recent developments along the east side of Granville Road, which are now widely visible not only from Charlcombe but from the whole valley, the A46, Solsbury Hill and further.

Other concerns include substantially increased light pollution, the effects of this development on water pressure (and whether developers' solutions would be acceptable), and unsustainable additional traffic implicit in this proposed development, particularly on Colliers Lane.

Finally I am concerned at the three-stage sale of the MOD site, which means that it would not be possible to plan a harmonious development. If this development goes ahead it should be based on a clear and well-structured comprehensive overall plan, with harmony throughout the plan, and on a scale which fits the available site.

It may be that the ambitious scale of the Draft Concept Statement is just too ambitious for this particular site, and it may be better, if this is the case, to make the right development in a different location

Representation ID Number: 2955 / 1

New homes are obviously needed, and the ex-MoD site, with its existing services, seems highly suitable. For the existing inhabitants of Lansdown Road and Granville Road, there would be advantages, assuming that the development would result in additional facilities and an evening bus service. The area would presumably need a shop, and possibly other amenities, such as a clinic, or café.

I'm concerned though about reference to expansion beyond the existing boundary of the MoD site. Whoever the playing fields behind the site belong to, they should be kept as such, whether for the existing users, or for the use of the new inhabitants of the site. Developing virgin countryside is surely against the spirit of Green Belt, whatever the strict legal position may be .

Representation ID Number: 2955 / 2

Reduction of traffic on Lansdown Road – shop on site, preferably a Co-op, NOT a Tesco.

There is room for each house to have plenty of garden space.

Not one big estate – break it down into smaller communities.

Would need a health centre.

Representation ID Number: 2956 / 1

My main concern is that far too many houses are being planned for the Ensleigh site; the context and local character calls for a far lower density: in other words, significantly fewer homes than the 350 envisaged.

From a transportation viewpoint, a high-density development on the edge of the city makes little sense to me; it will inevitably bring increased traffic and therefore extra noise, pollution and congestion for local residents.

In particular, for those of us who live on the Lansdown Road, it is already often difficult to drive safely out of our driveways onto the Lansdown Road at peak hours. This will become even more difficult and more dangerous if the proposed development goes ahead. A similar problem exists for pedestrians trying to cross the road.

I do not accept that provision of bus services will address the problem; the proposed new development is predominantly for family houses, and my own experience (as someone with a family) is that families here rarely use buses if they have a

car, because buses are too impractical and expensive for most families' purposes.

Furthermore, I strongly oppose the development of the adjacent playing fields. This would result in a new suburb being established which would cause irreparable damage to the setting of the World Heritage Site and threaten future encroachment on the green belt. Such an extension would also create even more traffic problems for the Lansdown Road, a historic road that was never meant to carry high volumes of traffic.

On a more general note, I don't understand why BANES wants to build 6,000 more homes in Bath, which is already a congested city. I thought that the 6,000 target was set by the previous government and that the target was effectively abolished by the Localism Act, so that local authorities are now free to choose their own housing targets.

Representation ID Number: 2957 /

- As the population becomes more obese and fixated by computers, the provision of playing fields for children and adults alike becomes even more important – ensure that the playing fields remain for that purpose
- Ensure that all development (of the existing MOD sites) is carried out fully respecting Bath as a World Heritage City – preserve and maintain this designation for the future
- Similarly for the Area of Natural Beauty and Green Belt. Bath is an exceptional 'world city' and must be respected as such
- The BANES' target of 350 homes, plus 2000sqm of B1 employment space plus 3.3ha of open space is not justified in the documentation and would create severe over-development. This is over-optimistic and should be significantly reduced.
- The topography of Bath with its green hill sightlines from all surrounding areas must be protected at all costs to maintain status as AONB and WHC
- Colliers Lane to be protected by restricting provision of restricted access
- Careful design of lighting to avoid light pollution
- Prevent encroachment of the City boundaries into the green areas and open countryside beyond. Do not permit the playing fields to be developed.
- Utility provisions – are the water, sewerage, electricity requirements capable to support the new development at this time? If not, what is necessary? This should be made clear at this time.

The items below are repeated from the 'Changes to the Vision' above

- Develop ONLY the existing MOD site NOT the playing fields
- Maintain and restrict any future land use of the existing school playing fields as playing fields.
- Constrain development to high quality residential only – plus the potential for a small convenience store
- Constrain the Ensleigh North and Ensleigh South developments within one fully coordinated master plan
- Ensure that the lanes at the North East end of Granville Road are protected/restricted access – no rat runs, ensure restricted access etc
- Drastically reduce the number of units from 350, which is massively excessive overdevelopment (clarify the provenance of this figure relative to the usable land
- No materials permitted to be taken off site during construction – eg re-use all excavated materials for landscaping/bunding etc
- All building material to come into the site from the North West – ie nothing up Lansdown road from the city side
- Confirmation that EIA shall be required – include controls over aesthetics
- Ensure high quality architecture, use of materials, aesthetics all in keeping with this unique World Heritage Site and Area of Natural Beauty

Representation ID Number: 2963 /

We are extremely concerned about the traffic congestion (and possible solutions) at the junction of Granville Road and Lansdown Road, especially prior to the opening of the Lansdown Road entrance and proposed new round about at that junction. It is vital that a new roundabout is built at the main Lansdown Road entrance and a realistic, preferably short, time scale for this should be agreed in advance of any other work being undertaken.

In addition during the annual "Toad Crossing" period alternative diversions from Charlcombe Lane should be considered which avoid the Granville Road junction

Representation ID Number: 2964 /

The proposals for the 3 MOD sites seem to me poorly formulated in that with minor differences each site is dealt with as if

it were identical. The sites are in fact very different and proposals should take account of local factors as well as the overall needs of the Town.

Amongst a range of differences between the sites Enleigh will form a key entrance into the town, and the change from open country site to urban development needs to be treated with particular care. The site is also on the sky line which adds to the sensitivity issue. Height, density and lighting are all key factors. The merging of town and country can be made very attractive but high rise buildings and industrial developments on sky lines, which has happened in other situations, would detract greatly from the image of the town.

Finally a master plan should be developed for the whole site to prevent a piecemeal unco-ordinated approach by different developers over the time span the site is developed.

Representation ID Number: 2965 /

Strong direction to expanding beyond the MOD site develop public transport

Representation ID Number: 2967 /

The MOD site redevelopment is a good idea as it can be made useful and more attractive. It is a negative initiative to expand this development onto the playing fields adjacent and then to allow further development creep which will have a significant impact on existing residents. I am very concerned about where the existing playing fields would relocate to if their current sites were to be developed. All surrounding sites would impact the surrounding AONB which should be protected.

Representation ID Number: 2970 /

The Planning Services Dept. should never have considered this type of development. The development for housing of the Enleigh site was not included in the 2007 Local Plan. The concept statement by envisaging such a major development and enlarging it to include adjacent playing fields owned by Kingswood and the Royal High Schools violates so many key objectives of the Local Plan strategy that it could never be acceptable.

Representation ID Number: 2973 /

Given that new housing is needed (although with the loss of this major employer presumably the pressure on housing has been reduced in the short term) then this seems like a good location for some of it. As a major entrance to the city care should be taken not to damage the setting of the city as seen by new arrivals as well as from within the city. Surely the opportunity should be seen as improving the setting of the city in its unique natural environment not as a way to reduce the size of its natural setting. Therefore every attempt should be made to minimize "urban sprawl"/ribbon development. This would mean being sure not to expand beyond the current MOD footprint and minimizing the impact on traffic flows and congestion in the city.

Representation ID Number: 2974 /

1. The closure of MoD Enleigh has meant the loss of many jobs for Bath. There is now, however, an opportunity for the Council to show leadership and innovation and develop the site in such way as to attract new companies and enterprises to the area, for example, by building a science or technology park thus providing much needed employment for local people. The use of the site for housing is a missed opportunity.

2. The proposed development for housing is on a scale which is wholly inconsistent with the site's rural setting and its proximity to the AONB and the World Heritage Site.

3. In addition, the proposed size of the development will have enormous implications on traffic flow in the local area which is not designed to hold large volumes of traffic. I do not believe that the residents will use the proposed bus services on a regular basis unless the development is used for student housing.

4. I strongly object to the development of the potential sites to the north and west of the site and any future urban extension to the green belt.

5. This development appears to be driven by the Council's stated objective to build 6000 new homes in Bath. The first

point in this regard is that this figure is arbitrary and based on assumptions and predictions which will turn out to be wrong. The second point is that whatever target is chosen, the stated objective must be achieved with sensitivity and consistent with the World Heritage Site management plan. The proposed development of MoD Ensleigh on the scale proposed does not do this.

Representation ID Number: 2975 /

As stated, this is a key area in terms of visual impact and green spaces around Bath. It is a gateway to Bath that should reflect its world heritage status bounded by the beginnings of the Cotswolds and AONB. Whilst housing development is necessary it is essential to minimize any sense of "massing" in this green area. Therefore, I welcome the opportunity to re-develop the existing low level buildings with a new community but am concerned about any spillage onto current fields and farmland.

Transport. Whilst this is stated as a priority, there is nothing specific. There are plans for a primary school and existing secondary provision in Bath has spare capacity. However, it is well known that Bath is very adversely affected by excessive traffic transporting children to school. There needs to be affordable provision for secondary age children to travel to either Beechen Cliff and Hayesfield (single sex provision) or to Larkhall (St Marks).

Road links. Current traffic along Charlcombe Lane has reached dangerous levels making it very difficult for pedestrians to walk at key times which includes the time when people might walk to work. Any allowance of road access from the rear of the site will result in traffic along Charlcombe Lane. It would be necessary, for safety reasons, for this road to be access only or for use of public transport (in the event that a bus is provided to Larkhall). For six weeks of the year the road is closed to all except residents anyway to allow for the toad migration. This should be allowed for in transport planning.

Representation ID Number: 2976 / 1

The MOD concept statements for Foxhill, Ensleigh and Warminster Road encourage innovative housing such as self build or zero carbon. 10% of the total new housing stock is proposed in some instances, however this is not consistent across the 3 sites and self-build opportunities could be lost by the developers undertaking their own zero-carbon projects for open-market sale and still meeting the 10% requirement. The 3 MOD concept statements need to state consistently that across each site a minimum of 10% of the total new housing stock should be reserved for self-build opportunities which are also rated BREEAM excellent or zero-carbon.

Representation ID Number: 2981 /

I support the comments made by Charlcombe Parish Council.

I do not favour expansion beyond the MOD site. In the event that it does occur, the alternative sites for the displaced sports facilities must not be relocated in the Green Belt or AONB.

Traffic is already a problem on Lansdown Road in terms of volume at peak hours, speeding, reckless overtaking and the difficulty of crossing it. These issues must all be addressed.

Representation ID Number: 3055 / 1

I have been advised to share my concerns with you about the process leading to the sale and development of the Ensleigh site shortly to be vacated by the M.o.D. I introduce myself in some detail in the enclosed short paper, but a summary can be seen at the foot of this letter.

These concerns can be summarised as follows:

1. As far as I am aware, the agreement between the former owners of the site (The Royal School, now the Royal High School) and the Admiralty (now the M.o.D.) has not been made public. If rumours about the conditions are correct, they could greatly affect the way any development proceeds. Will you please insist on the M.o.D and Royal High School making the agreement public as soon as possible.
2. I share the concern of many at the speed with which the sale of the Ensleigh site is being conducted. It will lead to a development that will fail to achieve its full social, environmental, architectural potential and is likely to be of less financial value to the vendors. How can a developer put an optimum value on a site if there is such uncertainty about what will be acceptable to the Council?

3. The present Draft Concept Documents for all three sites cannot be described as a 'concept'. They are, rather, preliminary site analyses accompanied by an important series of regulatory, environmental and historical studies that form the knowledge base. In BANES's Draft Document, it is suggested that further study would be premature at this stage. I strongly disagree. These studies are meaningless without some indication of the broad spatial impact of the volume of space to be built and the infrastructure necessary to support it.

It is very short-sighted for the M.o.D not to have engaged a nationally-respected firm of urban designers to do initial 'massing' studies to explore alternatives. These could have informed the briefs of all three sites and given some comfort to the public. Until a three dimensional model or set of models exists, nobody (council or public) is able to judge. I am aware that it is the responsibility of the M.O.D. to do the work but cannot B.A.N.E.S. put pressure on them to do so? If the M.O.D. cannot be persuaded, it is of such importance that the Council should finance it themselves. I urge you as Leader of the Council Chief Executive to do all you can to delay the sale of the Ensleigh site so that a solution worthy of the city can be outlined.

I urge you as Chief Executive to do all you can to delay the sale of the Ensleigh site so that a solution worthy of the city can be outlined.

Introduction

I am very aware of the delicate position BANES finds itself in, being forced to move forward on the planning of the MoD. Sites with such unreasonable speed. All three sites have important urban contexts but Ensleigh, on the northern boundary, is particular problematical. It appears that the MoD understandably looking for long-term operational efficiency is forcing the pace for short-term financial gain at Bath's expense. They should be ordered to slow down and to this end, it is important that both Don Foster, MP for the area and Jacob Rees-Mogg MP for the directly adjacent area, are fully briefed in a bid to postpone the sale. However, it is disappointing that the Council has not looked at the sites in some detail over the years, as the likelihood of them being vacated has been plain to many of us. It is even more regrettable that they did not insist upon a landscape screen round the MOD many years ago.

I hope that my contribution will be seen as constructive and that my suggestions both in terms of process and content will be looked at seriously. My background can be seen on the web but, in summary, I was one of four design directors of Arup Associates from 1977 to 1991 and was jointly responsible for a number of major design/planning initiatives, notably Stockley Park, Heathrow; Paternoster Square, City of London; and The BBC Centre project, Greenside Row in Edinburgh. While I held the Chair of Architecture at the University of Bath from 1991-2000, we built the computer model of Bath and I was involved with city planning issues. I organised and chaired the RIBA competition for the University's sports complex. As Head of the Department of Architecture and Chair Professor at The University of Hong Kong from 2000-2005 we inaugurated the first architectural conservation programme in South East Asia now recognised by UNESCO and operating in People's Republic of China.

Historical Background to the Ensleigh site

Ensleigh sits adjacent to the old Saxon parish boundary of Charlcombe (Ceorlcumbe = Rustics Valley) and may be part of that area of land mentioned in the 676 AD land grant of 100 manentes given by Osric, king of the Hwiccae to a Frankish Princess, Bertana, to found a nunnery for 100 virgins. Geographically, the brow of the hill at Ensleigh is the last before dropping south into the Avon valley and Bath itself. In 1940 an agreement was signed between the Admiralty and Bath for the taking over of the area on which the MOD offices sit. With the exception of a few new structures, those offices are 3-4m high and of no architectural quality. They are visible from the approach road across Lansdown and are visible from many points round the city. The land is directly adjacent to one of the finest monuments in the area: Beckford's Tower which sits on the western brow over Weston.

Crucial questions

1. There is a strong rumour that there was an undertaking by the Admiralty to return the land to the owners (The Royal School) in its original green state when vacated. Why has the agreement between the Admiralty and the Royal School not been put in the public domain? BANES must insist upon The Royal School and the M.O.D. doing so.
2. If the precedent of the M.O.D. development were not there, how would it affect the attitude to building on that land?

The two scenarii.

1. If an agreement to return the land to its original green state exists, there is no case for the government to sell it and all work towards sale and development must stop and reviewed.
2. The MOD is allowed to sell the land to the highest bidders who will then go through the normal planning procedures.

Scenario 1. A legal agreement exists to return the land to its original green state.

Page 5 of the draft shows that the MoD land and the area to the North West of it not in the Greenbelt. If the MoD buildings had not been built there, how would that have affected the present alignment of it. There would have been be very strong argument for it to be in the Green Belt. The MoD will argue that they can sell it as development land but BANES must insist upon a judicial review before allowing any further work towards development to take place. In this scenario, All moves to sell should be put on 'hold'.

Scenario 1. The MOD can sell Ensleigh as Development land

The northern approach to Bath

The approach to Bath over Lansdown is exceptional by any standard. Its quality has been eroded recently by a number of badly judged developments but one still moves from a rural area directly into an environment of high quality building and urban landscape. It is against this context that any further development will be judged.

Understanding the Draft Concept Document

Unfortunately, the draft concept statement now out for consultation, is likely to raise anxiety and awkward questions rather than give comfort to the public. In consequence it will aggravate the council's problems in moving forward. In the statement from BANES, it is suggested that further study would be premature at this stage. I strongly disagree. As an experienced architect/urban designer, after my client had defined the 'nature of the place' to be created, I would recommend that the implications of a brief be tested in three dimensions on any given site. Having done that, the balance of accommodation would be modified and one would have the confidence to present a quantitative and qualitative brief to my client and to then to the public. Without such a test, it is a case of 'the blind leading the blind' as any comments from consultation cannot help but be vague and misleading even to an architect/urbanist of forty years experience.

The key question for both council and public is:

What are the three-dimensional implications of a development of 360 new homes; a new single form entry primary school; 2,000 sq. m of BI; 3.3 ha of open space; 600/800 car parking spaces on a 10.35 ha site on the brow of the Lansdown plateau overlooking the W.H. C, and of greatest importance, what are the social consequences?

Much important historical and environmental work has been commissioned and is contained in the appendix of the Draft Concept Document but there is nothing on the massing and community implications. Indicative studies would have been inexpensive and could have been carried out within a few weeks. If all else fails, I would be prepared to work with some placement students from the University of Bath's Department of Architecture and Civil Engineering to do some preliminary work to test the brief.

What sort of 'PLACE' is Ensleigh to be?

Having no information about the number of people expected in the average house, for the sake of this exercise, I assume it to be an average of 2 to 3 per dwelling, giving an overall population of between 800 to 1100. 2000 sq metres of B 1 office space could accommodate 400-500 employees on the basis of 4 sq. metres per person. This number may be exaggerated but the total population of the site, excluding those involved in the school, suggests the order of car movement. Unless the level of restriction imposed on the 'Wessex Water' Brassknocker Hill site is repeated here, the car parking alone will fill a large area of the site.

Village, Neighbourhood or Suburb?

The size of the development is insufficient to give a self-sustaining village with shops, medical facilities etc. but is much too large to fit neatly into the Lansdown area as an extension without destroying its character. Indeed it would be considerably easier to create a sustainable/energy efficient village with 1500 souls with a 'heart' if it was at some distance from the entry to Bath as it would have to create its own character and strength. In its proposed location the residents' focus will be the city centre. BANES is therefore confronted with an impossible task unless one of the major assumptions about the development is changed.

The process of sale proposed for the site.

The MOD/BANES appear to have agreed that the site should be divided into parcels to be sold off separately. To achieve any coherence in design between these parcels will be very difficult, even if a series of 'design guidelines' are part of the legal agreement. In practice, guidelines are hard, if not impossible, to uphold because each developer, wishing to optimise his profit, will push for more and/or different. Without testing the way boundaries to the parcels are set in some detail, one cannot know whether they are defined to give the optimum in terms of community, density, design and value. One result of such tests, for instance, could be changing the alignment of Granville Road.

The Constraint and Opportunities diagram (page 3)

The diagram sets out the main issues clearly but until each is tested they must remain 'wishes'. The points raised summarise deeper thinking by the planners and each could be expanded. I will take only one of them: 'the impact of any development on the surrounding skyline to the WHC'. One of the outstanding characteristics of the city is the ring of trees that surround it. It must be right to surround the site with trees but recent development to the south of Granville Road breaks the sky line and sets a dangerous precedent. The MoD offices, only 314m high, can be seen from various sensitive locations. If even part of the present projected brief is built, there will be need for structures of three/four storeys (9/12 m in height). Trees can be planted when semi mature at the height of 9/12 metres (at a price) but they take years to recover and would take fifteen and more years to create a substantial screen. It may be a view jaundiced by working with developers but, as views will sell properties, the developer or the subsequent owners will do all they can to frustrate the growth of the screen to exploit the views and raise the value of the property.

The Bath University computer model of the city

The first city computer model in the UK was built in the Department of Architecture and Civil Engineering at the University of Bath in the mid 1990s. The contours of the town are modelled, as are the ~ buildings in the city centre. We built the model both for historical study and so that schemes could be inserted and examined during public consultation and by the planners in committee. Sadly it has been used very little by the city. The MOD sites, although not in the historic centre, are ideal for such exploration and BANES should use the model to reassure the public that the scale of development is appropriate.

Concept Plan (page 6)

This diagram shows the proposed division of the site into parcels and indicates the possible access points to the site. It implies the possibility of three new junctions to the main road and the building of a new road to the north of the playing fields with no indication of where it would rejoin Lansdown. The potential volume of traffic serving the site is likely to generate queues that, in turn, will encourage residents to seek other ways of entering the town. Perhaps it is proposed to close off Colliers Lane at the top but if, as suggested in the diagram, it remains an access to Larkhall, I foresee a call for widening Colliers Lane with knock-on implications for all the small lanes in the district and a clogging effect on the village. The extension of Colliers Lane to the north and west would certainly be required if the scheme is to be extended and enlarged on to the land which holds the playing fields.

Pollution

Let us remember the light pollution that is generated from the university. The control on these factors is certainly stronger than it was and Wessex Water had high standards to attain.

What will be at the core of the public's reaction to the Draft Concept Document?

There will be many who are totally opposed to any large development there for purely NIMBY reasons or to protect the historic resonances of the city, but the argument about destroying the entry to the city and its skyline are strong. A more measured reaction will be either that the public does not have enough information to make a reasonable judgment or that the accommodation proposed for the site appears to require buildings of inappropriate height and density for the edge of the city. I suspect that any three-dimensional study would show that some buildings of four storeys may be proposed. To repeat a point made early in this piece, I consider that the council has made a rod for its own back.

Does the Draft Concept Statement contain a CONCEPT.

There are a series of policy statements and an initial analysis of the site but without further study to show that the brief fits harmoniously on to the site, it remains a statement of wishes for the developers to explore. Sadly when they return with their answers, the planning department will not have the ammunition to argue, as they will not have the support of the experts who should have done the massing studies.

What major assumptions within the draft might be questioned.

At this early stage in the development of a design, it is usually possible and advisable to 'brainstorm' the possibilities in what the design world call Charrettes. These are opportunities not only to talk ideas but also to draw and model them. Within the presently proposed short timescale, this is extremely difficult. My knowledge of the possible and unthinkable within planning law is out of date but it is worth asking the following to stimulate ideas:

1. Size and content of brief.

Yes, the city must built its quota of housing but is the quantity and mix right of the area? The idea of a primary school might be expanded to include secondary thereby clearing the whole site at St. Marks Larkhall for denser village housing supported by and supporting well-established local facilities. Surely in an existing and thriving city, housing should be constructed where it can strengthen existing neighbourhoods rather than be attached to a periphery

2. What is the appropriate location for such a development?

With such strong arguments against building on the brow of the hill as an extended suburb and in full view of the northern approach to the city, might a village be considered outside the boundaries of the WHC. As a 'for instance', might it be built near the racecourse adjacent to some historic buildings outside the WHC?

3. Design a fully sustainable community.

Resist the MOD#s call for a 'milch cow' able to maximum immediate profit from the site and insist on building a zero carbon community thereby strengthening the historic reputation of the city as a place of outstanding architectural innovation. Strengthening the historic reputation will in the end add to local income as well as environmental awareness locally and nationally.

4. Other.....?

Representation ID Number: 3066 / 1

I am concerned by several aspects of this Draft Concept Statement.

- (1) I thought the basic principle for the MoD use of the site was based upon return to green field at the end of tenure. Any development should therefore put a priority on the retention of green space.
- (2) I would like to understand the total housing need for Bath and how this proposal fits with that requirement. Is an anticipated increase in the Bath population envisaged?
- (3) Priority should be given to high quality property buildings which should not exceed ground plus first floor height.
- (4) It is not appropriate to mix business/offices with housing since this is inconsistent with residential development.
- (5) Why is there a need for a primary school on this site? What catchment area is envisaged? There is a consequent potential for further increase in traffic at peak times.
- (6) In this Concept Statement It is unfortunate to see in-built development creep by inclusion of the Kingswood School sports facility site. This is counter to a well controlled development and retention of green space in the future.
- (7) The proposed density of dwellings is too high for a well balanced housing development. It has the potential to produce an isolated community which will not integrate with the existing local residential population. Also, I am concerned that the infrastructure will not be able to accommodate this. Such a large development will lead to a disproportionate increase in traffic along the local roads and particularly the single-track lanes which lead to Larkhall.
- (8) Visual impact on the sky line and on entry to Bath if incorrect has the potential to impair the heritage status of the City.

I would welcome further discussion and clarification of these points. Also, could you please provide a clear understanding of the next steps in the process.

Representation ID Number: 3066 / 2

Concrete, plastic and hardcore are rapidly eradicating England's lovely green spaces and the countryside between urban areas is getting ever smaller. It is so important to protect for our children what is left at present. It would be lovely to use this area as a green space for everyone in Bath and a place for children to integrate with nature (perhaps even climb trees!). This MoD site should be returned to Greenfield.

The new development called ' Lansdown Ridge', which lies down the hillside from Granville Road, can be seen from many areas across Bath shining out like

ugly factory buildings across the landscape. This in itself has been the cause of much disappointment and distress to many who previously enjoyed a view of the hillside which was unspoilt by this unsightly development. In this case a privileged few have defaced the countryside for very many. I am concerned that this has created a bad precedent; how has this been allowed to happen? New houses, if needed, should be well built, well maintained and surrounded by trees and gardens for the benefit of children and wildlife.

Representation ID Number: 3067 / 1

Whilst there is little room for objection to the development for housing within the boundaries of MOD Ensleigh subject to satisfactory design and high quality building standards, the idea that development should extend to adjoining areas, currently sports fields used by the Royal High and Kingswood Schools is totally unacceptable because

- (i) there is no certainty of the availability for development of these areas
- (ii) by inclusion of this intention in the Concept Statement, shows a cavalier disregard of the existing use of these areas (at a time when the Olympic Authorities are exhorting all to take up sport) would seem to be contrary to that commendable aim.
- (iii) the creation of a MONSTER neighbourhood on this site is not sustainable or desirable. Sustainable because of increase in traffic, access, services, etc. Desirable because AONB, World Heritage, adjacent Green Belt and Conservation areas, light pollution etc.
- (iv) The viability of the proposals for 350 homes. BI employment space, open areas allotments etc within the MOD site is subject to proof. Meanwhile it is doubtful.

Representation ID Number: 3069 / 1

- Site isolated from amenities and services
- Too small to attract investment in shop, school, surgery, etc
- 100+ homes at affordable rent could attract residents on incomes too low to maintain necessary level of family support
- potential for social deprivation
- have brought this to the attention of CEO of CURO

Representation ID Number: 3072 / 1

That all dwellings should have their own garage/parking and not have to rely on street parking.

Representation ID Number: 3076 / 1

1. Will the development really protect the skyline ?

Sadly, -the Ensleigh skyline has been impaired already, as permission was given for –the building of four luxury houses at Lansdown Ridge, Granville Road. Two of them are far too prominent.

We live towards the bottom of Van Diemen's Lane. 'The view from the back of our house is across three fields to the Ensleigh skyline. Now, the focal point from our dining room window is one of the Lansdown Ridge houses. I am sure this is a splendid home to live in with its glass walls and beautiful views, but from our viewpoint it is like having a car showroom on the skyline.

I fear developers will seek to use the lower Lansdown Ridge building line as a precedent when building homes further along the road. At the consultation at Kingswood Sports Pavilion, we were told that a developer has already bought this land. It is the prime site with the far reaching views and, no doubt, the developer will want to build as many luxury homes on it as possible.

To preserve the skyline the buildings should be low rise and set well back from the edge of the slope. This was done in the 1960's when the Granville Road bungalows were built so they are not visible on the skyline at all.

At the consultation, we were surprised to hear that planners have not yet walked around the site or walked local footpaths and roads to get a real feel of the area. I should like to invite planners and developers to visit us to see exactly what an

impact additional insensitive building on the skyline would mean. The thought of more houses resembling car showrooms along the top is horrifying.

I assure you my concern is not "NIMBY-ism". For everyone living in our beautiful City, the skyline that we all see around us is so precious and special. Please ensure the development does not damage the Ensleigh skyline any more than it has already been damaged.

2. Lansdown is a residential area. The prime need, we are told, is for housing. If this is so, keep offices and office blocks in the City Centre where there are all the facilities that office workers need.

3. The Draft Concept Statement emphasises providing cycling provision. How many MOD people have been cycling to work? It might be interesting to enquire. I suggest developers and planners all cycle to Ensleigh from the City, Larkhall, Weston, Langridge and Wick. In every direction the route back home to the Ensleigh site will be ,up a long steep hill. It may be the right thing to do to promote cycling, but in practice the Ensleigh development is unlikely to produce many regular cyclists.

4. The development should be contained within the MOD site and not encroach onto the schools' playing fields. I do not like the implication in the Draft Concept Statement that this is likely to happen.

Representation ID Number: 4322 / 1

Introduction

I found it impossible to answer most of the questions on your Comments Form because the wording of the questions, and the restriction to the use of ticks, meant I could only answer them in a way which would have been prejudicial to my views. Therefore, I enclose a partially completed form and give below my comments on the Draft Concept Statement.

1. Principle

I looked forward to the departure of the MoD from Ensleigh, in the expectation that the blight of the ugly buildings, particularly on the skyline, would be removed and the land reinstated as open space and be added to the adjacent greenbelt. It is most regrettable that the MoD appear to have obtained powers to sell the land for development and that the Council consider they have to cooperate with the MoD, because of the pressure from the government to obtain money for the Treasury and to meet questionable housing targets set by central government.

Accepting the above situation, the principle for development of Ensleigh should be to minimise the extent and impact of the development and, in particular, to take the opportunity to improve the skyline.

2. Skyline

There are several references to protecting the edges of the site and skyline. However, I have the following concerns.

a) Although Figure 6 appears to offer protection to the skyline, there are no dimensions and the 'tree skyline' illustrated does not exist at present. The document should be much clearer on the absolute need to protect the skyline and set out the requirements needed to achieve the protection (such as setting back buildings from the edge of the hill, height of buildings, the use of tree screens).

b) The skyline is particularly sensitive in the morning light, so that is the time of day to assess the existing views and consider the measures needed for protecting the skyline.

c) The existing Ensleigh buildings on the south side of Granville Road spoil the skyline and the development will provide an opportunity for the Council to rectify the 'war damage' by ensuring the developer recreates a natural skyline, by adopting an appropriate layout and height of houses and a tree screen. There is a related suggestion in 9 (d) below which would contribute to restoration of the skyline.

d) The recent appearance of new houses of great height, bulk and inappropriate materials on the skyline (Lansdown Ridge) are a great disappointment and cause of concern about the ability of the Council to ensure developers keep to the principles set out by the Council. The houses are not in accordance with the terms of the Draft Concept Statement: "Scale and massing are critical, particularly adjacent to the ridgelines" and "Natural Bath stone ashlar or other appropriate high

quality materials will be expected to be the dominant materials for the elevations of buildings that front the public realm throughout the development”.

The glass walls of these houses, combined with the cascading mass of the buildings, have the appearance of a modern factory, as they glare down on Bath. The developers of Ensleigh must not be allowed to use these houses as a precedent. Indeed, it is desirable that the council seek some remedial measures to avoid such an approach. Assuming that the houses were built to plans agreed by the Council and demolition cannot be required, then some tree screening by the developer or the Council would help.

3. Lansdown Road

The present rural approach to Bath should be maintained. As with the protection of the skyline, the development should be made invisible from Lansdown Road by the use of low rise houses, set back from the road, with a tree screen.

4. Lighting

The existing ‘street lighting’ at Ensleigh produces an orange glow over the site and the developer should ensure a more environmentally friendly lighting scheme, which illuminates the ground but avoids lighting the sky.

5. Energy Generation

The Statement requires the developer to address the potential of “solar technologies and ground or air source heat pumps etc” for onsite energy generation. Solar technologies need to be used carefully to avoid unsightly roofs. Wind power should not be permitted as it would be unsightly in this sensitive area.

6. Recycling

The MoD site has many buildings, roads and car parking areas and demolition will create a large quantity of ‘waste’ material. The statement should include the requirement for as much recycling as possible, particularly of concrete and brick which can be used as hardcore or aggregate for the development. This would ensure the reuse of a valuable resource and save cross city lorry journeys for disposal or recycling at Odd Down.

7. Development Mix

At the consultation, I was told that the Council need to allocate the Ensleigh site for housing development to help meet government imposed targets for house construction and that failure to allocate sufficient land would be liable to lead to a demand to concede green belt land for housing. Therefore, the site should be used entirely for housing, in order to meet the government’s perceived demand for Bath. Space cannot be afforded for offices and community facilities. These facilities already exist in the city centre and in accessible residential areas.

A new primary school would take up a lot of land and consideration should be given to use of existing schools and options for developing a new primary school in an area which would be able to serve a wider community (e.g. the site that will become available when the Royal High Junior School moves from Lansdown).

8. Expansion of Development

I am astounded and dismayed that the Council can even contemplate extension of the development of the Ensleigh site into the school playing fields. The playing fields are greenbelt in all but name and if they did not exist the land would undoubtedly be included within the designated greenbelt. Although not technically greenbelt, the playing fields are visually attractive green open space, with a public footpath alongside and through the land. It was stated at the consultation that the playing fields could be moved north onto adjacent greenbelt land, in which case that land would lose its greenbelt status and also become eligible for development, under the present approach of the Council, when politically expedient.

The Council has a duty to protect our greenbelt and the setting of this beautiful city and should not be encouraging development creep into the playing fields and greenbelt. The only reference to the playing fields should be a clear statement that they are not available for development.

9. Transport Improvements

Halcrow have produced a very good ‘evidence base’ document:

a) The proposed access to the development via a roundabout junction with Lansdown Road is an excellent way of both

gaining an access and improving safety on Lansdown Road. Adoption of this as the main and easiest entrance should also help reduce the use of Granville Road and its junction with Lansdown Road.

B) There appears to be a contradiction in the Statement. Under "Layout" it mentions that "Development accessed directly from Lansdown Road will be strongly resisted", whereas under "Access and Movement" it states that "There will be at least one vehicular access to the site from the Lansdown Road and at least one vehicular access from Granville Road". Two accesses onto Lansdown Road in addition to Granville Road are undesirable and the Halcrow proposal of the main access via a roundabout on Lansdown Road, with a secondary access from Grenville Road is much better.

C) All reasonable measures need to be taken to deter the use of Granville Road as an access to Colliers Lane, which is inadequate for use as a through route.

D) I attach a sketch superimposed on a Google map to illustrate a suggested realignment of the east end of Granville Road to achieve the following advantages:

- A double bend to help deter non essential through traffic to Colliers Lane.
- Unification of the MoD land to give greater flexibility in the layout of the development.
- Scope for the creation of a recreational open space (as required in the Statement) next to the realignment, with good views.
- Setting back buildings from the edge of the site, with trees in the recreational space, thereby providing the required protection of the skyline.

E) The extension of the bus service 2 through the site is desirable. However, it will be necessary to provide off street parking for residents and visitors and to ensure that any on street parking does not obstruct the bus or, more importantly, emergency vehicles.

F) The proposal to improve the Lansdown Road/Richmond Road junction is welcome as even today it is a dangerous junction because of the poor site lines up Richmond Road for traffic descending Lansdown Road.

G) Improvement of the Lansdown Road/Weston Lane Junction would also be welcomed for reasons of safety, as well as any worsening of queuing.