

Representation ID Number: 96 / 2

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 / 2

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 (c) 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.

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The principle challenges for this site are ones of social integration and transport planning. These two issues are not core issues for BPT but will be very important to establish a real community. The way in which affordable housing and student housing is treated within the site, and the way in which there can be associated benefit for the adjoining estates in Foxhill North, are crucial in achieving benefit for the wider Combe Down community.

We believe the site offers opportunities to include managed student housing serving Bath University as it is along the plateau and offers potential for easy cycling and walking.

We welcome the layout criterion (p6) to encourage public appreciation of the remarkable vistas over Bath, including 'the specific public viewpoint' (p8) which should avoid local residents' complaints by being incorporated subtly into the landscaping from inception.

Self build and innovative design should be strongly encouraged.

Detailed response

Page 3/5

Issue: Lack of clarity of the exact position of historic routes and rights of way.

Suggested change required: Add Pope's Walk & Ralph Allen's Carriage Drive to diagram/map (or label them if they're already there).

Page 1/8

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 (built forms as well as landscape, page 8) and the need to respond positively to them.

Suggested change required: Strengthen reference to WHS values, p1 & 8.

Page 6

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

Page 6

Issue: The section on design principles needs reordering and strengthening. It should lead with the visual impact and historic environment considerations. The section on scale and massing should be brought up and given more emphasis.

Suggested change required: Strengthen to give clear idea to developers of constraints, especially in relation to historic environment, heights and massing.

Page 8

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 9

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

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

Suggested change required: Offer guidance for energy saving preferences, and design principles for solar panels and green roofs.

Page 11

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 / 2

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: 276 / 1

1. Foxhill is currently an employment site.

2. Its capacity as such must be replaced and substantially enhanced if the draft Core Strategy objectives, never mind the LEP's objectives, for employment numbers growth in the City are to be achieved.

3. In evidence to the council relative to CIL, BNP Paribas have stated that office sites in the river corridor are not commercially viable. (Your members will have a view on this, I am sure).

4. It is commonly acknowledged that the two Universities, and particularly Bath University, are a major key to the future prosperity of the City. To support this, the City should be seeking to provide downstream employment to graduates emerging from the Universities, and this requires a science park within a reasonable distance of the University campus. In

this context the location of Foxhill is ideal, on the orbital road which links the two Universities. There is also sufficient scale to deliver something significant (unlike at Warminster Road).

5. Foxhill, given its location, could also play a major role in the provision of student accomodation, thereby potentially releasing HMO's currently occupied by students into mainstream housing and thus reducing commuting.

6. While Warminster Road can and should, of course make a contribution to employment, so should the other MOD sites. Carefully though through, this would be not only sustainable but also financially viable and deliverable (unlike the river corridor proposals).

7. All of this is the key to the City achieving and then maintaining its status as a major centre of learning, with all the benefits which that will bring. This is Bath University's only opportunity to break out of its very constricted campus.

8. Thus, the employment component at Foxhill should be much greater than the 25,000 sq ft currently proposed.

9. The Concept Plan should provide for a minimum of 10,000 sqm of employment space providing between 350 -500 workplaces.

10. The location, so close to the University of Bath, should also be considered for student accommodation

Development Plan

The current Draft Concept Statement for MoD Foxhill is unacceptable, as the overwhelming priority is given over to residential development, with 'upto 2000 sqm ' only, set aside for employment space, under the heading Community Facilities. Consequently, whilst the development requirements and principles relating to that part which is residential are important, given its setting in the WHS and the proximity of AONB alongside, this response does not address the points raised in the consultation but focusses on the strategic planning principles that underpin this site.

For the purposes of the Development Plan, the Local Plan 2007 remains the adopted and approved plan. The NPPF 2012 says that this plans will remain in full force for the next 12 months.

Therefore, whilst the Core Strategy 2011 is the emerging new development plan, its status is limited given the absence of an Inspector's Report in to findings and into its soundness. The extent to which the proposals at the site at MoD Foxhill can be said to accord with the Development Plan is therefore material. There remains outstanding objections to elements of the Core Strategy, including the need to provide for employment space in Bath, which are yet to be determined.

The Local Plan 2007 General Development Policy B2 is still material to MoD Foxhill.

Details of the policy B1 are :

B2. MOD FOXHILL - site area : 18.7 ha

Development Requirements (see also Development Guide for this site approved 1998):

Comprehensive mixed-use scheme including: 1. Land for residential and business development (Use Classes B1, B2 & B8).

2- 4. DELETED 5. Retention & enhancement of existing vegetation, boundary planting & reinforcement & maintenance of northern boundary planting. 6. Main vehicular access onto Bradford Road, with at least one secondary access onto

Foxhill incorporating traffic calming measures. 7. Local centre, including a small food store with residential development above, that does

not harm the vitality and viability of other local centres. 8. Minimum of 2.0 ha of public open space & children's playing space 9. Protect and enhance the Bath skyline.

The Local Plan policy seeks a comprehensive mixed use scheme with employment and residential development. In essence, whilst it does not define the scale of residential or employment development, it nevertheless defines it as a comprehensive mixed use scheme, that is to say a significant proportion of both development uses.

It is hard to see how the current Draft Concept Statement can be described as a mixed use scheme when the scale of proposed employment amounts to only 1% of the overall land area. This will be reduced if workspace is developed over 2 storeys, but will also need to include car parking and landscaping. Overall the proposed number of workspaces (Arup EP/RDA Sept 2001 Report) is only 100 if provision is a Serviced Business Centre. It will be less than 66 workspaces if a Science Park/ R&D/ Small Business Units are provided.

This represents a very modest employment provision at this location, particular in view of the number of jobs to be lost from MoD Foxhill (believed to be in excess of 1200 workplaces).

The number of proposed workplaces at MoD Foxhill amounts to between 1.2% and 1.8% of the overall net planned growth in workplaces in Bath to 2026, as set out in the Core Strategy. The losses at all three MoD sites to Bristol, means that the overall target of the Council is increased by 2500 workplaces at Bath ie 8000 new workplaces. This proposal will provide between 0.8-1.2% of that overall figure.

The Council's solution to the provision of the majority of the workplaces (5000 workplaces) is to locate it in the river

corridor in Bath. The deliverability of this solution is before the Core Strategy hearing however significant obstacles exist to provision, including a most recent assessment by the Council's own advisers, BNP Paribas, that none of the office schemes within the river corridor are presently viable.

Clearly residential development at MoD Foxhill has the opportunity to support employment provision on site at Foxhill, including provision of infrastructure, and to provide a subsidy if needed.

The Solution

The appropriate and sustainable solution, given the scale of new homes and the existing workforce alongside, many of whom will not be relocating to Bristol, is to provide a significant contribution to workplaces, so that the need to travel to work is reduced in this area.

We recommend that upto 500 workplaces should be provided at MoD Foxhill if serviced office accommodation is provided. Perhaps an even better opportunity to stimulate high value workplaces is through a close linkage with Bath University and its considerable expertise in various technology fields. A new science/R&D development site at MoD Foxhill would have substantial attraction to new investors, given the worldwide status of the University. This could meet many of the objectives of the LEP and of the local Business Initiative, that seeks retention of students within the city, post graduation, to develop new business spin offs and high value growth. Such a proposal would create upto 350 new workplaces on a similar footprint.

Development of a science park /RD hub will require investment, however the opportunity through the LEP, to access funding for such an initiative exists.

To conclude, the Council needs to engage with the business community, the LEP and Bath University to explore the opportunity at MoD Foxhill for more ambitious employment provision, linked to the economic and technological strengths of the City. The deliverability of such a site is clear to all and certainly more viable than current alternatives. The Development Plan recommends such mixed use development for this site.

Representation ID Number: 277 / 2

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 / 2

We have now had an opportunity to review the three concept statements and would wish to meet with you to discuss them in more detail.

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 / 2

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 / 2

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 Endsleigh 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 / 2

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.

Representation ID Number: 1102 /

We are writing to comment on the Foxhill MOD site development concept statement that has been put forward by B&NES council and which is currently under consultation.

As the main provider of Primary Healthcare services within the Foxhill area we recognise the Health and Social issues that arise in our community and are pleased that this opportunity is being taken to take stock of the general health and wellbeing of the area and take action towards resolving such issues through a coordinated plan encompassing Social, Educational, Environmental, Family and Health factors.

We have also read in detail the Concept statement documents that have been put forward for proposal and note the aspiration towards having a new Health facility as part of the new build.

Our view on this specific part of the plan is that a multi-agency view (including B&NES Council, NHS B&NES PCT, Public Health and ourselves) should be taken with regards to Health Facilities and if a need for new facilities is identified and is affordable then we would very much see ourselves as the principal Primary Care provider. We would then take the work forward and develop plans for such a health facility, working with the site developer and PCT and Council to ensure that both new and existing patients would benefit from a full range of Primary Care services.

We would be happy to discuss this response (and our ideas around the wider range of services that could be provided) in more detail

Representation ID Number: 1366 / 2

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 /

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: 2600 / 1

I note that the MOD site at Foxhill will include the following -

- 700 new homes in a range of types and sizes, including 35% affordable housing;
- Up to 2000 sq m of B1 employment floor space;
- A new single form entry primary school and a new Early Years facility ;
- A site for a new primary care health facility
- 2.8 ha of formal open space,
- 2.8 ha of natural areas, and 0.56 ha of allotments;

This is a very very substantial development by BaNES

Please can you justify why there is no provision in this proposal for 5 or 6 pitches fro Gypsy and Travellers.

Representation ID Number: 2611 / 2

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 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 2010/2011 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 specifying6 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 required7 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 thermal8 and air source heat pumps9 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 framework10 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 systems11.

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 experience¹² 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 12 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?

Paul Stansall, Philip Haile, Virginia Williamson & Dick Daniel, plus others on behalf of Transition Bath

Sheltered housing should be provided on site.
Somerset - part buy and part rent
Likely demand locally - Rock Hall & Paddocks - flat access
Flat site - good opportunity
Combe Down elderly. Part buy for sheltered housing should be included.

Representation ID Number: 2620 / 1

Split site primary school

Representation ID Number: 2621 / 1

Concerns over the traffic flow during building works. And parking once land has been assigned.

Representation ID Number: 2622 / 1

The area should not be too dense - concerned there will be too many houses too close together - with the site so close to the 'Fox Hill' estate it should not replicate the estate - although social housing is needed in Bath, the fact it's so close to Fox Hill should be a consideration to avoid it turning into a 'ghetto' in future years. Open spaces, well space houses one must stop it being over populated.

Representation ID Number: 2624 / 1

Very concerned about increased traffic on Bradford Road, where will school be? Parents parking.
This form is not clear, use language that is not easy to understand.

Representation ID Number: 2625 / 1

More shops in new development 700 homes = 1000+ cars clogging up already limited parking in Combe Down (in particular) and Fox Hill

Representation ID Number: 2626 / 1

Open spaces / connections with woodlands, community pathways, wildlife viewing, childrens area e.g. woodland, free climbing area, exploring nature, picnicing, yurts, teepees, green climbing frames all ages, leisure facilities, eg. Swimming pools, tennis, skating, bike riding area, Childrens garden with giant sized plants, water features for outdoor play. Primary schools and secondary. Shops (independent)

Representation ID Number: 2627 / 1

A sports centre / park
More shops to meet increased demand

Representation ID Number: 2628 / 1

Currently, Combe Down primary school is too small. It would benefit hugely if the existing school could be used as an infant school and to move years . . . The rest of the pupils to a new "Combe Down Primary" site. This would free up space for both sets of pupils - this is much needed.

Representation ID Number: 2629 / 1

I think there should be less housing as the main Bradford Road is already at breaking point, and hoping to encourage people to cycle or bus is a little naïve. Everyone wants their own cars.

Representation ID Number: 2630 / 1

PLEASE be AWARE! Backstones open space is to left as it is. No building on this ground. It is NOT M.O.D. property! It was left to the children and people of Combe Down by Squire Russell for the recreation of all.

Representation ID Number: 2631 / 1

The creation of vista points could give views directly into our home (Fersfield)

Representation ID Number: 2633 / 1

It should not be as densely developed as present Fox Hill estate. A lot of provision of open space (play areas needed) It should not impinge on Stonehouse Lane, Priory Close or Trinity Road.
Acces onto North road needs to be traffic lights (roundabout people will need shops).

Representation ID Number: 2634 / 1

Parking: ample parking to ensure new residents don't park in existing roads
Acces: Safe access for increased vehicle activity
How close to existing buildings: space around existing properties
Site 18.9ha: but only approx 6ha (2.8 x 2 + 0.56) open space - keep more open spaces.
Using existing Combe Down School: as infant school and building new junior school on Fox Hill site with more space.
Existing school is cramped for space. Better to have one school with 2 sites close by.

Representation ID Number: 2635 / 1

Please retain Backstones field as an open space accessible to the public. Combe Down is below standard for access to green spaces at the present and Backstones field should be excluded from the development footprint.

Representation ID Number: 2636 / 1

Proposed new footpaths linking / extending the Bath skyline, and providing new views (and green spaces) in the site sound like a very good idea.

Representation ID Number: 2637 / 1

My main concern is the increased level of traffic that this development would bring to an area already overlaoded with commuter traffic at certain times of the day.
Access routes are not sufficient for the needs of a new 700 home community.

Representation ID Number: 2639 / 1

Skyline?
More than two access roads i.e use Fox Hill to Perrymead

Representation ID Number: 2640 / 1

It should provide school places, preferably by splitting the present CDPS in the village and keeping the younger ages there and the older ages on the new site.
Concerned that it may kill off C D village

Representation ID Number: 2641 / 1

Sustainable Development: Make sure the houses have enough space for themselves - not shared space. New houses need gardens, decent verges, wide enough roads. The houses could be built WITH water butts to conserve water for gardens and car washing.

Better access to Combe Down is vital, otherwise the new development will simply be seen as Foxhill, not Combe down & social division will become more entrenched.
Some bridging points over Bradford Road would improve access and make it safer for pedestrians to get to CD.
Don't make this a ghetto with only 2 access roads. There needs to be sports facilities that all can use - suggest school facilities be available to public out of school hours. There also need to be a few shops near any school and medical centre, to promote a "focal point" for this estate . . . As well as encouraging flow between this area, Foxhill and CD.

Representation ID Number: 2642 / 1

Concerned about more social housing in the area.
More employment opportunities.

Representation ID Number: 2643 / 1

I think community works at its best when people have space to live and are not all crowded together. This is an opportunity to think of the long term benefits.
Thank you.

Representation ID Number: 2648 / 1

Will the road infrastructure cope with the vehicles to go with 700 houses?
Provision of a sports building / facilities would be good.

Representation ID Number: 2649 / 1

I am concerned about 'shared space' streets as they are not clear where the pavements end and the roads begin which is a definite safety issue.

Representation ID Number: 2650 / 1

- 1) I am concerned about 'shared space' streets as it can be very confusing for e.g. children if there are no kerbs (also for visually impaired people?)
- 2) I am worried about increased traffic on Bradford Road, which is already busy and dangerous at rush hour times.
- 3) Very important to have local shops
- 4) Secondary School . . . ? What is the plan?

Representation ID Number: 2652 / 1

You must avoid turning MOD Foxhill into a massive cheap housing estate.
More like Combe Down and less like Foxhill please.

Representation ID Number: 2653 / 1

Having seen urban building in Radstock, Peasedown and parts of Bath there MUST be facilities such as shops and well built play areas. Please do not make the area a soulless place of private houses.

Representation ID Number: 2656 / 1

Careful planning as this will create hundreds more cars on harrow roads!

Representation ID Number: 2657 / 1

- 1) Road access often [--] Foxhill / Bradford Road [--] is a concern.
- 2) Sufficient utilities for a large no of homes / offices.
- 3) Adequate parking required. Permits with enforced restriction of number of cars per house.
- 4) Present Bath skyline and the houses rubbish

Representation ID Number: 2673 / 2

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: 2696 / 1

I don't feel putting a new primary school so close to the old one is a good idea. I would favour making Combe Down Primary School an Infants school (Key Stage 1) and the new school a Junior school (Key Stage 2). This would help with community links between the new development and existing communities. It would also release more space at the existing school.

Representation ID Number: 2697 / 1

I am concerned that this space will be over developed - it could remain light and airy. Blocks of flats are not attractive. Go and look at Londonderry Farm near Kensham for offices. That's attractive. I support fully the views of Combe Down Primary School - Just the Juniors should be built there - retaining the infants on their present site.

Representation ID Number: 2698 / 1

If the new development becomes an overflow for the Foxhill Estate then the whole thing will be a disaster, especially for residents of Stonehouse lane, Trinity/Hadley road areas. Possible tensions between the Foxhill/Combe Down village communities must be acknowledged and faced honestly, to ensure a good outcome for all. Otherwise the development has the potential to be really good. School should also move (infants only) to new site.

Representation ID Number: 2701 / 1

This is a fantastic opportunity please do not squash in masses of houses with no green spaces trees etc - IMPORTANT NEW SCHOOL/NURSERY. EARLY YEARS CHILDREN NEED SPACE TO PLAY NATURALLY as they develop.

Representation ID Number: 2702 / 1

Some of the fig.3 examples of precedents look inappropriate - medium use, cheap, flat sided apartment blocks - Ugh! They would not inspire those who have to live in them. (Top left, top right and bottom right illustrations are examples.

Representation ID Number: 2703 / 1

More traffic (need speed limits less than 30mph)
have one area for dogs to be exercised so other areas can be classed as 'dog free' as this would make the play areas and other field dog free and also the firs field free from dog mess.

Representation ID Number: 2704 / 1

We think it is an excellent idea to develop the site - and if you get it right it will add to the beauty of this lovely city. Please exert the greatest possible pressure on the development to get it right.

Representation ID Number: 2726 / 1

I think it is important for the local community to have a good focal point. Combe Down RFC, at Hollies Corner have a thriving mini/junior section, as well as senior, and they would benefit greatly from more land for additional Rugby pitches. They are important for the local communities in this area.

Representation ID Number: 2730 / 1

If there are going to be 700 new houses, there must be sustainable infrastructure and services to support these numbers. Not only school and health services but also shops, post office and play areas.

Representation ID Number: 2731 / 1

Community hall.
Means of employment esp for women - high tech sites?

Representation ID Number: 2732 / 1

Connect Combe Down Primary School with new school on site. E.g. Reception, year 1 and 2 in existing CDPS, and later years (juniors) on school site.

Representation ID Number: 2733 / 1

We have a 'wide open' site with good TV reception and Broadband provision. Solar energy is readily available and uninterrupted.

We have a reliable if expensive (>£1 per mile) bus service (13).

There is reasonable access to surrounding areas by car.

i.e. there is room for a community, fairly self contained, with personal transport to work.

Representation ID Number: 2734 / 1

De-engineer Bradford Road to create better link to Forester and Flower/Combe Down.

Facilities.

Key worker housing.

Representation ID Number: 2735 / 1

It is utopian to think that residents will seek to abandon their cars and I worry about the statement 'Delivery a cycle and pedestrian dominant area! Traffic along Bradford is an issue now and can only worsen. So roads are for me a real concern. Also, schooling. This will not impact on my children but will on my grandchildren. The matter of infant, junior and secondary school access needs to be thought through. The BANES track record is not good!

Representation ID Number: 2736 / 1

There is a tree I would really like to be saved. As you walk into Foxhill MoD, past the guard and bear around to the right, on the left is a tree that has been grafted. In the springtime half the tree has a white blossom and the other half is pink. PLEASE DON'T REMOVE THIS TREE.

Representation ID Number: 2737 / 1

I am VERY concerned about the proposal to create a new primary school. Far better to create a 'satellite' of Combe Down Primary School - infants on current site, juniors on new site. This would LINK the communities, ensuring the development is integrated with existing community facilities - and prevent closure of existing community areas (Combe Down co-op, Darling Deli, newsagent). We must ensure protection of the small community centre we have!

Representation ID Number: 2738 / 1

Concerns on security - fence patrolled currently
Concerns on noise - really quiet at the moment.

Representation ID Number: 2739 / 1

Combe Down school to become infants and 'new' school to be junior school.
A greater facility for childrens play and entertainment/education.
A wider mix of business permitted to attract all forms of business from traditional trades to new media/digital.

Representation ID Number: 2740 / 1

very concerned about the idea of a new school - we have no space for adequate play and learning at CDPS. Having a split site would be great for all and keep C Down village alive.

Representation ID Number: 2742 / 1

I am VERY concerned about keeping the site secure in between MoD leaving and full development. It seems like unofficial occupation of the site could be potentially dangerous to houses adjoining the site.

Representation ID Number: 2743 / 1

I think there NEEDS to be a new school because as our school we already have two classes in each year and we don't have much more space. Where are all the parents going to work?

Representation ID Number: 2745 / 1

Concerned that the developer will not be obliged by law to follow council recommendations - there should be some means by which the developer should be held accountable to meet all of the council criteria (draft vision and the development requirements and principles) and to what the local people say they want.

Representation ID Number: 2746 / 1

what will be the percentage increase in the population of Foxhill and Combe down. Like idea of existing CD primary school being changed to infants and new school being juniors - aids integration. Will Foxhill Lane be upgraded? We live at the top of Perrymead by Foxhill Lane. Impact of more noisy people walking past in early hours is a concern.

Representation ID Number: 2747 / 1

Open space in South west corner. Already many existing trees - Bradford Rd Foxhill houses have gate at the rear. Open space would enhance these houses in a difficult corner of the site.

Representation ID Number: 2749 / 1

Main concern - overdevelopment leading to intolerable levels of traffic on neighbouring roads.

Representation ID Number: 2750 / 1

I feel very strongly that there needs to be a very open feel to any new development with plenty of open spaces and play areas. Also I support the idea of building a JUNIOR SCHOOL ONLY and converting Combe Down Primary into an infant school in order to ensure that the Foxhill/Combe Down community is united and ghettos do not form. The Bradford Road must not act as a dividing line in the community.

Representation ID Number: 2753 / 1

Good safe access to site
Not adding to the congestion already in Bradford Road
Park land on south west of site

Representation ID Number: 2754 / 1

I'm concerned about the height of the buildings compared to the current MoD development; currently it has an open airy outlook which could be compromised.
Also Popes Walk is a narrow, muddy, steep route in places and couldn't support any significant increase in usage?

Representation ID Number: 2755 / 1

Houses along Bradford Road (South of the site) should ideally back onto green space/parkland etc as it's the most built up area.
Houses/developments should be built as far away from existing properties as reasonable.

Representation ID Number: 2756 / 1

Offer charitable organisations low rent to encourage them to have a base in the area. I work for Bath Mind and we pay a high rent on offices in central Bath. Other local Mind in the South West have either been given accommodation by their local authority or pay very low rent. Having charitable organisations in Combe Down would provide services, job opportunities and volunteer opportunities.

Representation ID Number: 2757 / 1

I would hope that the area between the MoD site and the disused railway (soon to become a cycle path we hope) will be preserved in its present state, rather than it being tified(?) into some kind of tame parkland. I also approve of the allocation of land for allotment development.

Representation ID Number: 2759 / 1

Concerns:
Car parking - 1400 cars?
Road access - main access from Foxhill limited from Bradford Road and Trinity road
Are existing shops enough?
Schools - expand existing?

Representation ID Number: 2760 / 1

No roundabout opposite Greendown Terrace to preserve residents peace. Roundabouts increase noise on vehicles slow and advance.
We require one coach parking space for visitors to Combe Down Stone Legacy Centre, due to open in 2013

Representation ID Number: 2761 / 1

the site must be integrated into the community as a whole. I support the Combe Down Primary School governors proposal to build a junior school on the new site and convert the current school site to infants. It would be great to have a playground on the new site and use it to connect Foxhill and CD village.

Representation ID Number: 2762 / 1

A unique opportunity to produce a development that enhances its area. A mixed development that seeks to produce quality housing that blends with the existing housing stock surrounding the site. A development that existing residents can feel proud of and give old and new occupants a sense of civic pride.

Representation ID Number: 2764 / 1

A school for the community
Sustainable development

Representation ID Number: 2764 / 2

is there going to be a working group? If so, how do we become a part of this?
Which local councillors are involved?

Representation ID Number: 2764 / 3

I'm very glad to hear that B&NES council consider it important to work with local residents and the community, taking into consideration their needs and concerns. I am delighted there is likely to be a school, allotments and leisure space on the site for the positive benefits of the community. I also have several concerns, some of which I raised during our discussion. These involved the potentially negative effect on wildlife and biodiversity in the area; the impact of development on the area as a whole as an SSSI, SAC and AONB, the impact on traffic and congestion in the area, the viewpoints which you propose and the 'concept' drawing showing the area linking the existing Fox Hill estate with the new development.

Impact on Wildlife and AONB

In the immediate area there is a large range of plants and animals which include fox, badger, owls, woodpecker, nuthatch, buzzard, kestrel, deer and bats to name but a few. There are also many unusual plants and trees. A huge development could impact on the local area and flora and fauna in a detrimental way. The development of the MOD site may affect the habitat of these plants and animals; of particular concern is the disturbance of the environment, increased light levels and reduction in foliage which could reduce the feeding ground for the Greater Horseshoe bats. I understand from the Bath Local Plan October 2007 that the MOD site falls in the bat feeding zone and their habitat forms part of the Special Area of Conservation. The 'Draft Concept Statement' recommends green corridors and strengthened links between new and existing habitats, but the impact of the destruction of habitat and the further impact of large numbers of people, vehicles and the associated damage and pollution is likely to have a negative effect on habitats and wildlife. Although the flora and fauna on the MOD site itself may have been altered by use over time and as a result it may be less diverse than the surrounding areas, the redevelopment of the site could allow the opportunity for this site to be restored to its former environmental state. I understand the restoration of habitats is a key point in the new National Planning Policy Framework 2012, and English Heritage also state that "Where the significance of a heritage asset has been compromised by in the past unsympathetic development affecting its setting, to accord with PPS5 policies, consideration still needs to be given to whether additional change will further detract from or can enhance the significance of the asset".ill
ill EH, (October 2011), p. 8.

Is the New Development Making A Positive Contribution to the Local Landscape?

National Planning Policy Framework pg 30 paragraph 126 comments that the desirability of new developments should make a positive contribution to local character and distinctiveness of a place. Also, policy NE 1 states that the character of a local landscape should be retained and enhanced. Looking through the 'Draft Concept Statement' literature provided at the meeting, I note that Figure 3 shows the design precedents and ambitions for the buildings on the site. I feel that the pictures chosen for the 'Draft Statement' show uninspiring and unattractive builds which do not in my opinion reflect the character of the surrounding area and AONB and do not in my opinion represent 'progressive urban design'. I would be very keen to ensure that any developers consider the local landscape and the impact of the development, and design the buildings with this in mind. This would enable future generations to be inspired by the design as in the rest of Bath. Risk, Safety and Impact of Development on Current Residents Whilst I recognise a green space would be beneficial for all, I am concerned at your choice of location for the 'linking' area. If this is created as per the concept drawing-at the end of Fox Hill, opposite Queens Drive then this would be right next to the houses at the end of Queens Drive and our own house.

This housing has been sited in the spot for a considerable time (since 1860 in our case). Developing a public space so close to existing housing would have a detrimental impact on safety and security, privacy, decrease the value of our homes, increase risk of criminal activity (such as theft or criminal damage), attract anti social behaviour, affect the character of our homes, affect the AONB, increase noise and traffic. There is also an existing issue with littering which would be likely to increase. I would hope that anyone developing the site would consider the impact of creating a public space next to existing homes and I would suggest that the public space be sited where there is no existing housing to compromise, or further from or well screened off with tall shrubs from the site of an AONB and existing housing. I am also concerned about the impact of such a development on the well being of residents. How is noise and visual impact to be minimised. Many residents of the area are sited in close proximity to the site are elderly, have children and pets. How is safety and privacy to be maintained?

Retention and Enhancement of the Existing Northern Boundary

As noted in the Bath Local Plan 2007, a retention and enhancement of the existing northern boundary vegetation is desirable. I see this as a positive increase in the security, planting and shrubbery along the length of the northern boundary to preserve its natural character, create a buffer against wildlife and habitat destruction and screen off properties nearby from the development and future impact of increased housing, people and traffic. Therefore I would request that the retention and enhancement will involve an increase in planting and tall shrubbery along the length of the site so as not to have a visual impact on the AONB, residents or wildlife.

Viewpoints

With regards to the viewpoints proposed at various points along the northern boundary, I would like to comment that there are exceedingly few places where one can gain any glimpses of the city and AONB due to the densely wooded nature of the hillside and in particular the tree lined southern boundary of our property and our neighbours which border the whole site on this side (the MOD's northern boundary). The proposed viewpoints directly overlook our own property and that of our neighbours at both ends of the MOD site. This would immensely compromise privacy and safety, change the character of our homes and open up the area to large numbers of people who would be able to inspect our homes and gardens.

Reinstatement of Ralph Allen's Carriage Drive/Walkway

With regard to the northern boundary becoming a reinstated Ralph Allen's Carriage Drive, this is currently a seldom used pathway. An increase in traffic along this walkway would impact on the current residents and on the flora and fauna of the site which is very diverse (as mentioned above). I understood from reading the National Planning Policy Framework 2012 that any development is meant to enhance the area in which it was created and help to preserve it. This is especially poignant as the hillside falls in the AONB. I feel that the walkway would adversely affect the area. In addition, the proposed walkway runs the entire length of our garden and our 2 neighbours. This again would affect our privacy, increase risk of anti social behaviour and crime, littering and other pollution. Planting a high screen of shrubbery would help to buffer the landscape and residents from this walkway, as would siting it further into the development. Increase in Traffic and Pollution. Another potential area for concern is road access to the Fox Hill area. From the Combe Down and Rush Hill sides; this is already congested and slow, especially at peak times. Fox Hill is difficult to travel along unhindered due to traffic. To introduce another vehicular access point from the new development could increase this issue, further affecting access for residents, road safety, noise and pollution. In conclusion, our concerns about the effect on wildlife, environment, AONB, residents and privacy could be lessened by creating an effective green screen of tall shrubbery as this would shield the landscape and residents privacy from the impact of the development; to site the linking area and walkway further from existing housing, and to design attractive building which fit with the style of Bath's architecture.

Representation ID Number: 2764 / 4

I have managed to access and read the evidence base. It looks as though a lot of very thorough research has informed the evidence base, and some of my concerns have clearly been considered to some degree, but there are still points concerning me. This includes the impact of the new development on the lives of the existing residents of the area, and

what is to be done to protect our homes, safety, privacy, light etc (as mentioned in my previous letter). I note that there is considerations for the future residents of the new development, perhaps it's something I've missed.

Also, I think that the impact of the development and future Carriage Drive will definitely affect the existing wildlife unless a significant amount of planting and distance screens the site from the SAC and AONB. The birds especially, regularly appear to fly in and out of the MOD grounds and many nest and feed in the trees on our boundary. We have seen feeding bats in our garden and there are badger setts in the old quarry. This all takes place along the northern boundary. I note there is mention of existing shrubbery on the northern boundary and feel this must be preserved and enhanced as habitat and protection for the wildlife. How is existing shrubbery to be increased?

I've also questions about how the viewpoints will work. At what height, position and form will they take. Will they look directly into our homes and garden which form part of the AONB? Can they be set at a height and distance so that our privacy is maintained and distance views of the WHS can still be enjoyed? What distance from our boundary is the proposed Ralph Allen Carriage Drive to be? It is already possible to look directly into our home from the current pathway that runs along the northern boundary. With increased traffic as a historic tourist destination, this would mean that we would be directly overlooked in our house and garden. With increased visitors comes increased risks as mentioned in my previous letter.

Also as the evidence base notes, our boundary wall is fragile at best -vibrations and close development may undermine the security of our structures, especially the retaining wall next to our house.

Perhaps it might be more cost effective to leave the current MOD fence in place and enhance shrubbery either side of the fence for at least several metres on the MOD side. This would hide the fence, lessen the destruction of the ground as the fence is buried to some depth, and provide a secure and safe boundary for the new site. Increasing the shrubbery inside the fence would afford the wildlife and trees protection.

Representation ID Number: 2765 / 1

We regard Combe Down as a relatively safe area, although areas of the existing Foxhill Estate does house a number of 'problem families'. Hopefully you will be sensible in allotting where and how many 'low cost housing' are allowed. Pope's Walk is used by a great deal of pople, especially elderly people who cannot walk the steep hill into Priory Close. It is important it remains safe and not a haven for vandals, drinkers and drug users to congregate. Years ago when families were younger this was apparently the cases. A neighbours gate backing onto the walk was set alight for example.

Representation ID Number: 2766 / 1

Affordable houses for all
Community centre and drop in centre for all ages
Youth Club
Centre for elderly
Doctors surgery or health centre
Recreational area for the young

*This form is full of incomprehensible jargon. Please rewrite the form in plain English another time.

Primary school
A lot of thought about extra traffic problems
Three exits from the site (already there on Foxhill, Ralph Allen Drive and Bradford Road)
Affordable bus routes for the elderly and families
Foxhill and the surrounding area has been shamefully neglected in terms of community provision - a tiny and locked community centre, no youth club, no health provision, nothing for the elderly of whom there are a large number.

Representation ID Number: 2767 / 1

It all looks good! Please try to focus on quality of housing stock. Also I believe there should be more on community meeting places, especially a church (e.g. linked to Trinity Combe Down) and a pub.

Representation ID Number: 2768 / 1

What about a church and a pub? These are essential for a community.

Representation ID Number: 2769 / 1

I am concerned about what impact building 700 new houses on the MoD site will have on the Combe Down village community

I am fully behind Combe Down CEVC Primary school's proposal for a new junior school section for that school.

Representation ID Number: 2770 / 1

Please could we have a new junior school for Combe Down school?

Representation ID Number: 2771 / 1

Popes Walk is in constant use by elderly people and it is highly important to keep Popes Walk and not to cross this historic route in any way. This is an opportunity to build a new school (primary) and health facility for the community and to develop a sensibly balanced site including SAFE green areas.

Representation ID Number: 2772 / 1

My main concern is that the communities in Foxhill Combe Down and the new development. To that end I think it is crucial that any school provision is for the WHOLE community, and that there are NOT separate schools for separate parts of the community.

Representation ID Number: 2773 / 1

All existing trees need to be retained

Also need to retain MoD boundary fence between main gate and Foxhill Gate

No building allowed over 2 storey and attic/roof

Still no TESCO in Bath?

Space used to have 5000 jobs. Why did council kick MoD out. MoD brought lots of money to Bath!

Representation ID Number: 2774 / 1

My concern is the vast amount of extra traffic this will create for Foxhill, and 700 houses seems excess.

Building height restrictions strictly monitored

Plenty of green spaces to be created and preserve the trees

Good street lighting

Representation ID Number: 2775 / 1

Primarily a community enhancement in terms of landscape, amenities, facilities, education, employment and housing.

Representation ID Number: 2776 / 1

The current plan has a perfect single class primary in spacious grounds being put 500 yards from a massively overcrowded double class primary. The community is united that this is a BAD idea please LISTEN to them.

Representation ID Number: 2778 / 1

Using different architects is a very good idea. I worked on a large regeneration project in London and using a variety of architects (not too many) within a masterplan creates interest for the people living there.

The outline proposals for getting into and out of the site concern me - the northerly access (assumedly through Queens Drive out onto Entry Hill is already impossible, the main Bradford Road exit is a busy, busy road all day particularly at school start/end times and during rush hours. I know these are the only viable possibilities but they will be difficult.

Representation ID Number: 2797 / 1

Bottom of Foxhill and junction of Queens Drive. Constant speeding around corners. That the bus stop is dangerous corner that incident waiting to happen. Space to drive down of junction Queens Drive to Foxhill.

Something for welcomer to Foxhill

Sun raise in the morning. Shine through MoD will be a miss to make a day.

Carol bus at Christmas all for charity.
Buildings with remembrance names of history to MoD
Too many vehicles for one houses. That nowhere to park.
Save Foxhill nursery.
Employment for everyone as half estate don't work.
ALLOTMENTS, LAUNDERETTES, LIGHT INDUSTRY, EDUCATION OF ALL ASPECTS
MUSIC STUDIO of all ages
Bungalows

"All best to future of buildings and may it be successful tp the project. In years. Good luck to your Careers from Combe Downer.

Representation ID Number: 2798 / 1

We are concerned that the northern border of the development has not been sensitively considered with regards to our home and the others in the hamlet of Fersfield which directly border it. To solve the problem this creates we propose the adoption of a slightly revised version of the planned walkway (old Ralph Allen carriageway) linking to Prior Park road. Our suggestion places this walkway further back within the current MoD fence boundary and raises the ground level on which it sits. This will provide a safer walkway (avoiding the steep drop on the border), give much better views across Bath and also will avoid serious trespass, security and privacy issues with the Fersfield community and our house which sits directly below.

ISSUES RESOLVED WITH OUR PROPOSAL (See plan attached) *Plan not printed with respondent paperwork*

- 1 Addition of a secure 6' wall or solid fence along the outside boundary from Fox Hill to Prior Park Road. The land which borders the full length of the Northern Boundary of the MoD Property is all privately owned by Fersfield residents. Without such a wall or solid fence walkers will not be able to tell the difference between public land and our private wooded gardens. Several of us have young children who would be exposed to unmonitorable photography, walkers, dogs etc potentially wandering into their garden/play area.
- 2 The position of the walkway in the current BANES plan would give walkers direct views into the bedrooms and bathrooms of the Fersfield homes. Positioning it slightly higher up the site, as we have visualised in our attached proposed amendment, would avoid this and also provide better views across Bath for walkers.

Finally, Fersfield gets very little natural light in the winter months and is extremely dependent upon the small amount of light that comes from the MoD direction through the trees on the Northern ridge. We would ask that any buildings on the northern edge of the development be single storey and low noise. We would also ask that there be no light pollution on that northern boundary e.g. no street lights or light bleed.

Representation ID Number: 2799 / 1

Allow Combe Down rugby club to remain where they are but allow them to purchase

Representation ID Number: 2801 / 1

This is the first time I have seen the concept statement and will respond in more detail after further study.
How will the open space 2.8ha, natural areas 2.8ha of allotment 0.56ha be protected from development creep?

Representation ID Number: 2802 / 1

Very concerned about impact of traffic flows on Bradford Road, with only two access points, one of which will feed into Bradford Road which ia already congested. Need a third access point?

Representation ID Number: 2804 / 1

Somer have housing stock for families, if when space is developed they build OAP 1/2 bed bungalwos with large rooms. Tenants can have ALL the family to visit, OAP tenants in 2/3 bed houses would move out of family houses into them no one will at the moment if they can't have family to visit.

Remember OAP housing and give family housing to those BORN in Bath with local connections.
Also a supermarket would benefit the area, not a co op or sainsburys.

Representation ID Number: 2850 / 1

I can understand the pressure to use this site for housing but traffic is the main issue in Bath. I therefore think the site would make a great park and ride for the A36. If housing could be incorporated into a cleaner, integrated scheme the dev of the Lansdown MoD site could also relieve traffic in Bath.

Representation ID Number: 2851 / 1

1 Exit from Fox Hill to Bradford Road is often difficult, if not dangerous at present. A higher volume of traffic at this point would make traffic flow much worse.
2. Any school should be sited in the centre of the development to minimise congestion and parking on access roads.
3. Notice that no provision has been mentioned for private bungalows or flats for senior citizens, although the site is level and convenient. This is badly needed on Combe Down.

Representation ID Number: 2854 / 1

Concern about security of adjoining properties specifically a secure lane between the western boundary fence of the site and the back gardens of houses on Fox Hill.

Representation ID Number: 2855 / 1

There is a space beyond the fence at the bottom of my garden and the MoD, what will happen to this? Is it proposed to build houses on this site? How will all the additional traffic be organised? Bradford Rd and north? Road are very busy as it is.

Representation ID Number: 2856 / 1

It would be good to explore the possibility of one large primary school on ONE site - mixing two communities, reducing traffic, new building for all local kids. A split site I think would be crazy - awful school runs, lack of headteacher presence/staff unity and more! Could you sell current CD Primary site to generate funds for the new site?

Representation ID Number: 2856 / 2

In light of all the discussion about the new primary school – one site, split site etc. Please can you add to your considerations whether there could be one new site incorporating the existing intake at Combe Down primary (instead of a split site). All children then go to one school; reduce congestion in the village, sell the site at CD to raise funds for new school, and most importantly link the three communities or FoxHill, MOD new community and CD village.
Having a split site would seem to me to make school drops off somewhat crazy especially with traffic and if you have kids at both schools, the teachers would lose the sense of team if they are split between sites, the headteacher would need to be based at two different sites and somehow fit into a very busy day travel between them....
This seems to be an opportunity to bring together a new large school in one purpose built building which would unite three communities.

I am also very interested in the self build housing space with a view to community living....

Representation ID Number: 2857 / 1

The other point I would like to make is people do not use public transport, however good the service, cars are so convenient and take you from door to door. The city is already congested and pollution is high. Please do not add to the problem.

*2 almost identical handwritten letters received 11th April, dated 5th April

"I strongly object to the MoD site at Foxhill being turned over to housing etc. It should be given over as a wild life trust for local residents to enjoy for leisure and all of Bath to visit. At the moment there is an abundance of wild life there that would be disturbed.

There is plenty of housing accommodation and business space in Bath. Look at the property paper all different price bands. I am sure that with more thought the council will see the advantages of a wildlife area for all to enjoy"

*Handwritten letter received 26 April, dated 22nd

"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: 2862 / 1

The primary school should cater for all ages groups and NOT be a split site with Combe Down. Plenty of safe play space for children and community buildings that can provide activities for children and young people.

Representation ID Number: 2863 / 1

Need clear and logical link between Skyline Walk and NT Prior Park Garden through to the new Stone Mines Legacy Centre in Combe Road. Some car parking and a coach stand would be helpful. Car ownership is a fact of life for 2 generations to come. Provision must be made for safe car use throughout the development.

Representation ID Number: 2864 / 2

Housing in this area could contribute greatly to providing a 'green' community i.e. trail trees along some of the streets, allotments etc. There should be no industrial working sites.

Representation ID Number: 2865 / 1

A lot of us would like no development at all. Just get rid of MoD site and turn it into parkland and open spaces for all to enjoy. Maybe the National Trust would like to buy some of it?
I am concerned about the effect of another 7 years of major development. We have only just got back to normal after the mines.

Representation ID Number: 2870 / 1

This is very interesting indeed
I hope it will be a great success
Will there be a liaison office during construction to deal with complaints about noise/dust/heavy lorries/muddy roads etc?
Thank you and good luck!

Representation ID Number: 2882 / 1

this is a golden opportunity to try and get things right in an area that suffers from so many misconceptions - 'posh' Combe Down it may be in parts but some parts of the ward are also pretty desperate. The recent report by Mark Hepsworth MUST be heeded if there is to be any social justice. That said those who are either workshy or who want to work need employment chances locally; building loads of houses is no good without some sort of local employment or it will just become another satellite.

I am extremely concerned that the suggested 210 number primary school is on the table almost as a fait accompli - it is not the answer.

This is a huge opportunity to join the whole of the Combe Down community together and building a new 210 school would create divisions in the community. Who would attend it? Only those people living in the houses nearest to it. Further entrenching the division between those at the current Combe Down primary and any new school. The 'old' school would be deemed as the poor relation with its extremely cramped site, some outdated buildings and the fact that it has no field! Should be the LA be providing a field?

A 420 size school would be no better. Parents would leave the current school in search of better facilities and the heart of Combe Down village would die. This is a community issue not just a school issue and if the council wants sustainable, integrated communities on its patch then it must consider the area as a whole and not just the new development. It seems to me that the school Governors idea of an infant (and possibly nursery site) on the current site with reduced numbers would be ideal. The grounds are perfect for young exploring minds and would ensure plenty of footfall in the village for local businesses/ At the same time a junior section on level ground with plenty of green field space (lack of enforcement and inconsiderate dog walkers means the Firs Field is a no-no for the school) would complement this. This as

a three form entry primary on two sites would ensure places for all, including the spare capacity at St Martins Primary, and give the area a chance to integrate properly.

If you really want to encourage community cohesion then a link with Combe Down Rugby Club would fit perfectly; there is already space to use and a joint use policy would still enable the developer to build a few extra homes and make a few extra £0000's.

Please, please, please consider this option. Even a 3 form entry school on the new development would be infinitely preferable to a 1 form entry - that just doesn't meet what the community needs and as our government says, LAs have to listen to the people.

There is also no adequate after school child care provision for many parents and a purpose built centre for both pre and post school care is essential. This could be on the site of both school buildings and be age specific or could be somewhere else fairly central in the development. If parents know there is a safe, AFFORDABLE and sustainable childcare available they may then be able to re-enter the job market, especially if jobs were created locally.

Transport - rather than an expensive and irregular bus system what about a funicular railway/tram such as the Hong Kong Peak Tram or those of Lisbon? This is only said halfheartedly in jest! A fairly straightforward link to Widcombe shouldn't be beyond the ken of a city such as Bath. After all we have Buro Happold here.....

Representation ID Number: 2883 / 1

*Comments via email

Thank you to all involved in the consultation process on Saturday last.

I welcome the scheme, particularly the proposed mix of affordable housing and believe 35% to be just about right. I also welcome the numerous other proposals for green space ecology, sustainable development, Community Facilities (particularly a proposed school and health centre) and the heritage and distinctiveness proposals.

I do, however, have two concerns.

As far as I could ascertain, the Backstones Open Space is not within the boundaries of the scheme. I hope that this area is being retained, as it was given to the community under covenant. It is vital that this is retained for recreational use. It is widely used by the residents of Combe Down. I have no issue about it being incorporated into the new development, but will strongly resist any proposal to relocate it.

Secondly, I am concerned about the increase traffic flow along Bradford Road / North Road that this scheme will generate. When the Southern Loop Road was being considered in the 1970s an integral part of this was a roundabout at the top of Ralph Allen Drive. Traffic now is much worse than then and will get much worse again under this scheme. With people travelling up Ralph Allen drive to return from work, the problems currently experienced in getting out onto North Road will, become much worse. Is it possible to consider installing traffic lights, or a mini roundabout at this Junction? Presumably similar issues will arise at the top of Entry Hill.

Representation ID Number: 2884 / 1

*Comments via email

I would just like to say In my own words that I think the Combe Down Rugby Club should stay where they are and be allowed to expand and have two pitches along side each other.

Representation ID Number: 2885 / 1

Stakeholder involvement

Examples of good practice learnt from the successful Combe Down Stone Mines project included effective engagement with all stakeholders (See the Good Practice Guide published by B&NES and H&CA). In the case of the Stone Mines a Steering Group of stakeholders was established, as well as a project-specific Community Association .

The re-development of MoD Foxhill will arguably have a far greater impact upon the community of Combe Down than the Stone Mines project and for that reason B&NES should once again seek to engage with the community through a formal channel of communication.

Happily, there is already in existence a Foxhill and Combe Down Community Association and which could well be a suitable vehicle for engagement with the community.

Highways/Access

I understand that the main access is likely to be off the Bradford Road in the vicinity of the existing main entrance. This makes sense but will presumably generate additional traffic necessitating improvements to Bradford Road. I assume we have to await Highway impact studies before such improvements can be identified.

My concern however is with the function of Fox Hill. The Draft Concept Statement shows vehicular access at some points along its length. I would like any S106 requirements to include works to Fox Hill to address the following:

- 1.Improve the junction with Bradford Road to remove the dangers associated with poor visibility for drivers turning from Fox Hill onto Bradford Road. At the moment visibility looking west is blocked by parked cars. A mini roundabout may be a suitable solution.
- 2.Measures to slow traffic down. The road is wide enough and straight enough to encourage speeding.
- 3.Remove the grass verges, themselves a maintenance liability and habitually used for parking, and replace with designated on street parking thus removing the bottleneck that usually occurs between Bradford Road and Hawthorn Road when cars are parked on both sides of the road, sometimes preventing buses getting through.

In order to reduce the pressure on Bradford Road and Foxhill, I suggest that more thought is given to greater connectivity with the existing minor road network to the south and east of the site. Stonehouse lane, Trinity Road and Priory Close could perhaps support accessing a limited number of additional dwellings.

This could also be an opportunity to open up Perrymead to one way vehicular traffic once again.

Community facilities

This is a once in a lifetime opportunity to provide first class community facilities and provide a focal point for the Combe Down community.

The Fox Hill and Combe Down Community Association is currently housed in inadequate and ageing temporary buildings on Hawthorn Grove. I suggest that replacement modern facilities are provided within the proposed education and health care facilities. Any S106 agreement should ensure that any facilities are sustainable in the long term, by which I mean that a source of income is available to sustain them financially.

The current premises are owned by B&NES and following relocation the land could be made available to the adjoining Church Rooms for off street parking.

The Draft Concept Statement makes no mention of retail facilities. I think that further thought should be given to the inclusion of local facilities alongside the proposed community facilities.

Education

I note the need for a new single form entry primary school, and understand that Combe Down School have expressed an interest in expanding onto a second site.

Would it not be more sensible for Combe Down School to locate in its entirety to a new enlarged facility on MoD Foxhill. The existing school site could be either returned to the community or perhaps re-developed for housing.

Historical Record and Community visit

Following closure it would be good if the community could be allowed into the site before it is sold.

Prior to any demolition, it should be a requirement that a full record be made of the buildings on site. The MoD have been a part of Bath's history since 1939, and its presence here should be recorded.

This could perhaps be something with which the Combe Down Heritage Society could be involved.

Footpaths

There is a footpath connecting the rears of 1-12 Fox Hill and houses on Bradford Road which lead via locked gates to Foxhill and Bradford Road respectively. The security gates were a Neighbourhood Watch initiative about ten years ago. Whilst the ownership of the land encumbered by these rights of way vests with the MoD, it is important that these secure routes are protected in any development.

Representation ID Number: 2886 / 1

I am surprised, given that this is the earliest stage of the consultation, that there is already an assumption that the school to be provided on the site will be stand alone with a single form entry.

The crucial objective with the redevelopment of the MOD site is that it draws the two separated parts of our village together ie Foxhill and the old village centre. School provision is major way in which this can be achieved.

Local communities gravitate around institutions such as primary schools. A new stand alone single form entry school will create two silos across Combe Down - the Foxhill end, and the leafy old village end. Providing either (i) a split site school across the new site (?Juniors) and the existing CDPS school site (?Infants), or (ii) a new three form entry school on the MOD site, will promote cohesion across the full village span from Foxhill to Shaft Road.

This is also a once in a generation opportunity to resolve the environmental and spacial issues at the existing CDPS site which is neither suitable nor adequate for the needs of the current number of primary school age children based there. The problems with dog fouling and drainage on the re-opened Firs Field are only compounding the problems that the school is facing in providing open green space for sport and play.

Clearly there are pros and cons for the two alternative school options I set out above.

On balance, my view is that option (ii) would be preferable (a new three form entry school on the MOD site, with the consequent closure of the existing CDPS site. This option would offer (a) a focal point for the whole village promoting a sense of cohesion from Foxhill right over to the old village, promoting full integration of the new development between the two existing halves, (b) equality of access to all children in the village, (c) the opportunity for a state of the art school for all children in the village with appropriate quantity and quality of indoor and outdoor space, (d) continues to promote the existing social mix in the Combe Down school system, (e) avoids a split site drop off/pick up for parents with children of ages spanning infants and juniors, (f) avoids the management complications of running a split site facility.

Representation ID Number: 2887 / 1

1. I think it would be great to have a large play area similar to Victoria Park as that one is always so crowded and it would be good to have one on the south side of the city.

2. An outdoor activity area for young people such as a skateboard park.

3. A community centre which can be used for all ages.

4. A leisure centre including pool and gym.

5. A football field

6. A Newsagent/shop for basics

All of the above aim to produce a community feel, where people can meet and socialize.

I think that the idea of a school is good but it needs to be working with Combe Down Primary and the present idea would

be competing against it. A better plan is to have a split site and as the present site in Combe Down does not have enough space for the older children to play and do sport in, I would suggest that the education site in Foxhill be a school for older primary children and the one now existing in Combe Down become an infant school. This would then allow for excellent facilities on the new site and there would be an excitement about moving to the new school for all, rather than competition between the two.

Representation ID Number: 2888 / 1

The council needs to bear in mind the potential for a negative impact on the wider community. While there are short – term cost implications the longer term financial implications if the heart of Combe Down is ‘lost’ (loss of local businesses etc) are surely greater.

Representation ID Number: 2889 / 1

Link the new school with Combe Down school, so that the new school is a Junior school and Combe Down is an Infants school.

Lots of cycle-friendly things.

Representation ID Number: 2890 / 1

I am very concerned that additional high density housing will add yet more traffic to the already saturated main North and Bradford Roads.

I am concerned that the businesses in Combe Down village itself (already struggling since the new Sainsbury’s opened) will not benefit from additional housing if new small shops are built there.

I am concerned that new facilities will siphon people and business away from existing facilities in the village, causing them to collapse.

I am concerned about increases in litter, exhaust fumes, on-street parking, traffic and anti-social behavior that can occur when high density housing is created.

Representation ID Number: 2891 / 1

I am very concerned to hear that the proposal is for a brand new school to be built in the new Foxhill development. As I understand it the proposal is for the new school to be for infants and juniors, thus being a rival to Combe Down Primary School.

As a governor of CDPS my focus is on what is best for the pupils there and for their families; if the current proposals go ahead I can only see CDPS quickly becoming the poor relation alongside a new school with brand new facilities and more space. For the sake of CDPS, and especially its children, please would you consider making the new school for juniors and the current CDPS for infants – or the other way round? This way both school can co-exist harmoniously. Any other way and CDPS, which has been for many years a really good (and full) school, will begin to go downhill.

Thank you – I really feel quite strongly about this!

Representation ID Number: 2894 / 1

Cycle routes, a children's splash park, nature garden, how about a community garden to grow fruit and veg. Opportunities for small businesses are important and not just shops. Infrastructure here is vital i.e fast Internet connections, affordable transport.

One concern that I have is that you mention "higher density lower car ownership development linked to buses, walking and cycling". Buses are currently ridiculously expensive. I live in Combe Down, have a primary school age child, but do not catch the bus now simply because it costs more to do so than to use the car. Bath Council needs to improve our bus services and make them more affordable to enable people with young families to use them.

My other key concern is in relation to a primary school. Combe Down already has an excellent primary school. However it is currently heavily over- subscribed and suffers from a huge lack of space. The best solution, which would not only provide the existing school with much needed and improved facilities, but would also help to integrate the local communities, would be to provide a new junior site (Yr 3 to Yr 6) within the redevelopment and to make the existing Combe Down Primary School into an infant site (Reception to Yr 2). These two sites could be run as one school by the existing

management team of Combe Down Primary School, retaining continuity of education and service to the community. I strongly believe this is the only solution that will truly integrate the communities and also provide the best education and facilities to both areas. Combe Down Primary School is in desperate need of additional space and this would be the ideal solution to solve this ongoing issue.

Representation ID Number: 2895 / 1

I would like to see the new school be a junior school and see the existing Combe Down school converted to an infant school.

Representation ID Number: 2896 / 1

THERE ARE CONCERNS FOR MIDDLE LODGE AND FOR EASTWOOD LODGE.:

Suggestions and Concerns – Middle Lodge

Please see all my points set out in the Development Principles. Additionally please note the following:

Middle Lodge was built originally in 1780 and was the gamekeepers lodge house for the Fersfield Estate. The well for the water supply to Fersfield Estate sits in my garden (and now my drawing room since my extension 6 years ago). It has enjoyed a peaceful and tranquil existence with the countryside and surrounds for over 200 years. I am incredibly concerned about this new “walkway” and other such things as viewing areas. With respect, no one is going to drive over to this development to look at the open space. You are not building a new park so the views are merely for the new homes that you are going to be giving planning permission for. The cynic in me suspects that it means that the developers can sell the homes for more money since they can boast of “views”. These views will come at a cost to me – an existing home owner. I believe that Planning permission is not meant to be granted at the cost and expense of existing dwellings?

My bathroom would be directly in the sight line of the proposed path and viewing area. At present I have enough problems with occasional walkers who wander along the boundary fence of the MOD with their dogs. I would feel incredibly vulnerable having my bathroom at eye level with your proposed walkway and view points. I have my niece and nephews visit on a regular basis all of whom are small children and I do not wish to compromise their vulnerability when bathing.

Whilst I have fenced an area of my garden since I have a dog, I have kept it as open wire fencing in order to be able to blend with the trees and shrubbery. If the fence between the MOD and myself is taken down this would invite people to walk in that area and stand at my fence some 10 metres from my home and peer into my property, the bathroom, the bedroom and the garden.

The Northern boundary out to the City is an Area of Outstanding Natural Beauty as well as an area of Scientific Interest from the wild orchids. The wild life is essential to this area. I have badgers, nesting buzzards, king fishers and recently the Britain’s smallest bird the Gold Crest has nested in my garden. Bats abound in the trees and around Middle Lodge.

Please consider placing the school which is single story or the Health Centre or indeed anything that would mean that noise would be minimised at certain times are placed towards this area. If it was a school the noise would be minimised in the evenings and non existent in the school holidays.

Please ensure that the fencing stays in place and is augmented with planting and also that there are arrangements made for a noise bund. I especially would wish the planting to be increased not opened up. If I have to put up a fence that is close boarded it would defeat the object surely of yourselves wanting views?

It seems so unfair that I have not slept since this matter has come up for consultation. You cannot have walked that boundary as you have not even considered the Fersfield Hamlet and the direct impact it will have on my home. I was shocked that I was not even invited to the open meeting and heard about it by chance. There are relatively few homes that directly abut – Fersfield is the MAIN NORTHERN BOUNDARY and yet you seem to have totally forgotten about it. I am worried sick about this and no one seems to want to listen or allay my fears. I have invested a lot into my home and the adjoining property Eastwood Lodge and it seems that this will all be for naught if your concept statement goes ahead unchanged. I would hope you would talk to me and try to find a resolution. Just because I have not mentioned something does not mean that I am happy with it and talking it through with yourselves would help to pacify my fears. Also these

ideas are my thoughts at present. There may well be further issues as the matter progresses but you will appreciate I have only had a very limited time to organise my thoughts and get them down in writing. I would hope that you would contact me and discuss these issues. Fersfield Management Company are also writing to you airing other views and putting forward an alternative drawing which is being attached to the hard copy of this document. However the drawing does not go far enough in regard to Eastwood and Middle Lodge as we were hamstrung with the plans we could get our hands on.

Suggestions and Concerns – Eastwood Lodge

Please see all my points set out in the Development Principles. Additionally please note the following:

Eastwood Lodge is currently let to English Country Cottages who achieve lettings of the same for over 42 weeks in a year. This results in substantial income to the City of Bath in terms of visitor spend and publicity. It has been a holiday let for over 10 years and one of its major attractions is the tranquil nature of the cottage combined with the ease of getting into the City. Please, please ensure that the tranquil nature of the Northern boundary at least is preserved in order not to impact on this business.

The balcony of Eastwood Lodge would be directly in the sight line of the proposed path and viewing area as would the bathroom area. Small children are nearly always a part of my holiday lets. I do not think it is safe or indeed right that such children could be spied on and indeed have photos taken etc. I do not think it is correct that adults can also be spied upon but the issue of children would undoubtedly impact on the business.

The garden and boundary line between the MOD and Eastwood Lodge is open. This has been kept deliberately so as the deer use this as a throughfare in order to access the area beyond Pope's Walk. This would mean that it would invite people to walk in that area and trespass into Eastwood Lodge. Animals and children would be able to stray and I do not wish to have dogs being able to jump into the garden where guests and their children are playing. Given the type of dog I have seen around the area I would fear for the children's safety. At present this is not an issue.

The Northern boundary out to the City is an Area of Outstanding Natural Beauty as well as an area of Scientific Interest from the wild orchids. The wild life is essential to this area. I have badgers, nesting buzzards, king fishers and recently the Britain's smallest bird the Gold Crest has nested in my garden. Bats abound in the trees and around Eastwood Lodge.

The pond of Eastwood Lodge has newts including the Great Crested Newt (I have only found one to be fair but one is definitely there). I believe they take to the land and can only assume it will be the woodlands to the rear of the property right up against the Northern Boundary of the site. It is even more essential that NO DEVELOPMENT OR VIEWING PLATFORMS OR INDEED PATHS go near this boundary edge.

Please consider placing the school which is single story or the Health Centre or indeed anything that would mean that noise would be minimised at certain times are placed towards this area. If it was a school the noise would be minimised in the evenings and non existent in the school holidays. It would also lessen the risk of people straying into Eastwood Lodge garden as the school could be fenced.

Please ensure that the fencing stays in place and is augmented with planting and also that there are arrangements made for a noise bund.

Suggestions and Concerns – Pope's Walk

Please see my development principles regarding Pope's Walk. I own 2/3's of the field that runs along the entire boundary of Pope's Walk and would stress that it would be a health and safety issue if it was turned into a formal cycleway. There is no where for a pavement to ensure that pedestrians and dog walkers were safe.

The walls are in disrepair and the path is exceptionally narrow. No excavation of the walls on my boundary can take place at all and I would not be happy if any bath stone was removed.

Fencing my field to prevent trespass by people and their animals would be essential if you are going to better this footpath.

ALTERNATIVE ROUTE – PLEASE SEE PLAN ATTACHED DRAWN UP BY FERSFIELD HAMLET WITH REGARD TO THE NOISE BUND/WALKWAY

*Plan ONLY attached to hardcopy submission.

Representation ID Number: 2901 / 1

I think the opportunity to create outdoor space in school for the children of our community is not to be missed. Combe Down School has so little outdoor space and problems in the playground abound as a result - I am a parent of a child that has struggled with issues at playtime for the last 3 years as a result of space restrictions - children resort to unkindness to entertain themselves as there is little else to do. Resolution to these problems will be largely achieved by building a new junior school on the MOD site and transorming the Combe Down School site into an early years/KS1 site only. To create an entirely separate school does not make sense - it will create competition and division in the community where inclusiveness and unity is required.

Representation ID Number: 2902 / 1

I've had a telephone call in Public Rights of Way here from a member of the public who was trying to locate, or promote a project to create a circular route suitable for her son who uses a wheelchair, and is a student at Threeways School. Some of the parents tried to get round a circular route at Rainbow Woods and found it to be unsuitable.

There is a network of paths from Threeways school, including a path alongside the Wansdyke, Shepherds Walk, that starts to form a longer route towards Rainbow Woods. It strikes me that the MOD site may be able to provide a high quality route (circular within the site, as well as a route along the escarpment in the site) to improve the local network. Given the likely housing population at this site, there may also be capacity for some off-site improvements linking towards the local schools of Threeways and Ralph Allen, and facilities such as Sainsbury's.

This may start to compliment the Bath Skyline walk with a route, in this instance, along the southern edge of the city.

Representation ID Number: 2904 / 1

I know that Combe Down Primary school are petitioning for the current plans to be changed to allow a new junior school on the site instead of a new primary school.

I am strongly opposed to this idea. As a parent with children at Combe Down Primary I would find it very difficult to manage children at two different locations. I also think this would add to the volume of traffic in the area as I'm certain most parents would drive between the two sites.

I also think it is valuable for the children to mix together in a primary school so they are used to being with children of different ages, especially useful for younger children who learn from their peers.

I am in favour of the current proposal to see a new primary school on the Foxhill site, while Combe Down Primary remains intact in it's current location.

Representation ID Number: 2905 / 1

In order to integrate the Fox Hill and Combe Down areas the school plans need to be fully integrated.

The Combe Down School site needs developing and there is insufficient playground space and no playing fields.

Why not build a school on the new site, which would meet the needs of the Foxhill and Combe Down community.

One of the ideas being considered is a split site school. It seems to me that no body would choose a split site school. A split site school would always be striving to become one. Apart from the costsx2 there are all the other factors.

1. I chose CD Sch over other schools because the Infants and Juniors were integrated. I think it is important for the 4 and

- 11 year olds to mix on a daily basis. This removes barriers and provides opportunities for both year groups to blossom.
2. How would a split site work with pick up/ drop offs?
3. An opportunity to provide our children with playing fields should not be overlooked. We have to rely on Monkton Combe and Prior Park Sch for our sports day.
4. We have no facilities for school dinners.
5. There is a lack of toilet facilities Children have to move between buildings and Reception have 2 toilets between 55 children.

The current school site could be used for housing and community facilities. The priority should be our children's education not local business losing their daily passing trade from CD School parents. They will still have parents from M C School and thought needs to be given to how best to use the current site.

Combe Down School is a lovely school, which has outgrown the site. Teaching requirements have developed and now we need to make the most of this opportunity to give our children the school they need and deserve. C D Village does not have any space for the school to develop even if you reduce pupil numbers you still have all the existing facility problems.

My final point regards transport.

PLEASE PLEASE think about cyclists. When you build a road build a cycle path. Think about children on their bikes.

Representation ID Number: 2906 / 1

I would support the building of a new Junior school with playing fields on the site. The existing Combe Down Primary could become an infant school.

The 2 sites are so closely linked that this would enable the Foxhill development to be integrated into Combe Down rather than being an isolated mini village on its own. It would also allow Junior age children from the whole community to have access to playing fields to aid development of a healthy lifestyle. It would prevent a "2 tier" school situation, with one school having new buildings and lots of space and the existing school being left behind.

If there was a slightly smaller infant school, at the existing school, some of the older buildings could be demolished to make way for larger playing spaces for these children too.

Representation ID Number: 2908 / 1

I am very concerned about the proposal to create a new 1FE school on the Foxhill site, which has the potential to be divisive – creating a "middle class" school in Combe Down Village and a "working class" school in Foxhill. I would prefer to see proper integration with:

- A new junior section with adequate playing field facilities on the new Foxhill site (preferably at the existing Rugby Club end so it is as close to the existing school as possible)
- Combe Down Primary changed into an infant school.

Representation ID Number: 2910 / 1

We would like to support the proposed suggestions by Combe Down Primary School, in having a split level site building the juniors section on the new Foxhill development. This would benefit the children by having more space, better sports facilities, playing field. It would benefit the community by providing better cohesion between the village and Foxhill, add value to the village with increased business and footfall and benefit the whole community including the Rugby club.

Representation ID Number: 2912 / 1

please 'listen' to the views of Combe Down residents who value this semirural lifestyle on the edge of our world heritage city. It would be a disaster if this site was to end up (note the Southgate Development!) as a soul less development and a completely wasted opportunity.

Representation ID Number: 2913 / 1

This is a very visible site. It should not intrude on existing communities but should be carefully integrated with provision for 'homeworking' only.

Representation ID Number: 2918 / 1

*comment via email

Please can we have integrated cycling and walking routes through the site?

For instance connecting Popes walk at the SE corner of the site with the footpath at Foxhill Grove that goes to Lynbrook Lane.

Representation ID Number: 2925 / 2

I am concerned that the development will kill the current centre of Combe Down, in particular I am concerned about the effect this may have on Combe Down Primary School and the Nursery in the Village. The plans need to be integrated, not competing. I support the Combe Down School Governors ideas about making the existing school a Nursery/Infant School and to build a Junior School with playingfields and sports facilities that could benefit the whole community. There should also be a foot bridge across Bradford road, to clearly and safely connect the two areas.

Combe Down Primary School has no grass areas or playingfields that the children can use, this is particularly unsuitable for the older children, and the site is very overcrowded – with a Victorian Building which is not fit for purpose. Development in the area is a good way to overcome some of these problems.

Representation ID Number: 2929 /

We broadly welcome the development of this site and the plans put forward.

Our house is on the boundary between the north side of the MOD and Fersfield. We are part of a hamlet of 6 properties and so there is also collective concern about the effect on all the residents.

Many of our concerns could be alleviated if the developer to be required to put an effective screening and planting scheme so that people cannot easily look down into our houses. If the screening (wall/fence) was placed at least 2 meters back from our boundary to the MOD site and then either side has prickly type plants put in, this would be the most effective solution. We enclosed a diagram to indicate our solution

Our concerns are:

- Lack of privacy/being overlooked/proposed viewing platforms- people being able to directly look into the house/neighbours houses in the Fersfield hamlet. Our bathroom also faces out to the front of our house where people could potentially be looking.
- Security of our hamlet and health and safety – ensuring there is not any easy access to our property. Our neighbours have small children playing in the woods which go up to the boundary. In addition, some of the boundary used to be mined for bath stone and there are some quite steep drops in some sections. Ensuring a good boundary fence/wall would ensure that people do not stray onto the land of Fersfield.
- Light to our property- all building to not be high enough to restrict any winter sunlight to our property.
- Noise – not having high noise levels from houses/playgrounds/any light industry near our boundary. We live in a very tranquil location which has deer/badgers and many other types of wildlife in the woods. We would not want this to be compromised.
- Lighting of new development: The placing of any street lighting on the boundary would need to be carefully thought through so that we do not have bright street lighting showing at night

Representation ID Number: 2931 /

I would advocate a junior section for Combe Down School with playing fields rather than a new small school. This would integrate the new community well with the old as people would have to bring their children from the existing school to the new site and children would begin in the infants section on the present site which would also encourage integration of new families with current community.

It would also promote community cohesion to have one school rather than 2 competing and it would allow the present school to build on its success and have some green play space that it's present site would never be able to facilitate.

I would include a library, as the current mobile library is well used, with an internet café as a community resource as this encourages community atmosphere - perhaps beside an open space, children's play area or close to the skyline walk to encourage walkers to take a break. It could also have an art gallery/craft space as this is popular in Combe Down. The existing MOD early years facility, Foxtots, is excellent and has some excellent toys and facilities not to mention staff!! - it would be ideal if they could have some input or say or ownership of the new facility.

There is high demand for nursery places locally and waiting lists are long and affordability of childcare a challenge. The local roads are already overloaded and Bradford Road forms a southern ring road for Bath - it needs to flow, how will this impact that? Could there be a footbridge or tunnel rather than even more calming measures? Ideally a road link at the bottom of the site to town to reduce car flow through existing roads or at least give an option, or soon we will need a southern bath bypass.

Green housing I am all for - perhaps some solar powered charging stations for electric cars also.

The church and the scouts are very active locally could they have spaces on the new development if not buildings then perhaps a prayer or activity space or garden.

How safe is the site to build on given the mines and railway tunnels which must pass under it?

Representation ID Number: 2934 /

A new stand-alone primary school on this site will hinder rather than assist community integration. Primary schools are often at the heart of the community. A new stand-alone school would cater for no more than the new community, which would increase its sense of isolation from the existing Foxhill and Combe Down communities.

Sitting where it does, the MOD site could provide an ideal opportunity to integrate the two communities more than already occurs by providing an extension to the existing Combe Down Primary School, whose pupils are currently drawn from the two communities.

The existing Primary School in Combe Down village is on a very cramped site, with little outdoor space and no playing fields of its own. Historically, it used Firs Field, but since the completion of the mine works, this area has been taken over by dog walkers and it is therefore not safe to use for the children. The school therefore has to rely on the good offers of nearby private schools, although this space is only available out of hours when the schools themselves do not require it.

A split site school, with a three-form junior school on the MOD site and a 3-form infants and early years' centre on the existing site would provide a once in a lifetime opportunity to meet this deficit and would also aid integration of the new community with the existing.

The open space standards associated with a three-form entry school could be met in part by dual-use of the facilities, providing playing field space for the local community out of school hours and also for Combe Down Rugby Club which urgently needs further playing space to accommodate its growing and very popular youth sections.

Whilst there are practical problems with split site schools, retaining the same teaching staff, leadership team and Governing Body would ensure successful integration between the two. The distance between the two sites is not great and is easily walked. It would not be difficult therefore for the school to put in place arrangements to help parents having to drop children off between the two sites.

A split site would also enable Combe Down School to provide both an early years' centre and before and after school provision; both of which are desperately needed to serve both Combe Down and Foxhill parents, but cannot be accommodated by the school at present because of the severe lack of space on the existing site.

Removing the existing school to a new site on the MOD site is not an option. This would have a severe impact on businesses in the village which rely on passing trade from parents and pupils. It would also result in a very large primary on one site. A split site would mean that both communities would benefit and there would be a much greater chance of integration as parents from all three communities met at the school gates.

Medical centre – this should not replace the existing facility in the village, but compliment it, perhaps run by the same team in the way that they also run the facility at Sulis Meadows. It is important that existing facilities are not removed from Combe Down village. The village has already lost its post office; the removal of other facilities would have a detrimental effect on the small businesses which rely on passing trade. It would also make access much harder for a number of older people who live in the village.

Cycling – integration into the existing network which provided an alternative, safer (and easier) route than Ralph Allen Drive would be welcome and might encourage more who are currently put off by the mile long hill, blind bends and speed of traffic.

Representation ID Number: 2935 / 1

On behalf of the Governors, staff, pupils and parents of St. Martin's Garden Primary School, we are opposed to a new primary school with early years' facilities. The school population is currently 31% from Foxhill. St Martin's Garden Children's Centre provides vital outreach and stay and play services through the Foxhill Community Centre.

The school site has excellent facilities and the physical space can accommodate an additional 210 which would take the school from its current capacity of 315 to 420 (especially as its number on roll is currently 185). Investment in school transport could provide a viable, safe and green option to transport pupils to school.

The school's performance is on an upward trajectory. The school therefore sees itself as 'suitable alternative provision' to the current concept statement

Representation ID Number: 2937 /

I feel strongly that the plan for the scheme should not be the sole responsibility of the developer. I feel that the developer may ignore the wishes of the Foxhill community instead looking for financial gain.

This is especially critical in the light of the recent report by Mark Hepworth highlighting the long term unmet needs of the foxhill community, and area desperate for regeneration.

I want to see that BANES is committed to this area, not content to sit back and watch it become even more depressed in the shadow of a new development.

Representation ID Number: 2939 /

WITH SPECIFIC REFERENCE TO THE CONCEPT STATEMENT, AND IMPLICATIONS FOR THE FERSFIELD HAMLET ON THE NORTH BORDER OF THE MOD FOXHILL SITE.

Trespass & safety – Without a proper physical delineation of the boundary to our collective wooded garden space, there is absolutely no doubt walkers will roam onto our land. This is firstly dangerous to the trespasser, because there is a sheer drop of about 2 metres into our woods – but perhaps more importantly, our kids play here without adult supervision, and the idea of strangers and their dogs having access to our space gives us great concern.

Overlooking – With the current MOD fence, people are unable to look into our woods or our houses. This must be maintained once the rather ugly MOD fence is inevitably removed.

Wildlife – We've been amazed since we moved here at the sheer amount of wildlife in this area. Specifically, we really worry that the deer population will be disrupted unless the entire north boundary is maintained.

Noise & light – The Fersfield hamlet is incredibly peaceful – we would need to see how any proposals will mitigate noise & light pollution.

My family and I moved to Fersfield on the North Boundary of the MOD site at Foxhill back in August last year.

Given I'm aware you have already received letters from my fellow Hamlet residents, I thought I'd spare you too much detail, and stick instead to headline bullet-points. Before that, I will just reiterate that broadly my wife and I are supportive of the development of the site – but there are a number of things in the Concept Statement which worry us:

- Trespass & safety – Without a proper physical delineation of the boundary to our collective wooded garden space, there is absolutely no doubt walkers will roam onto our land. This is firstly dangerous to the trespasser, because there is a sheer drop of about 2 metres into our woods – but perhaps more importantly, our kids play here without adult supervision, and the idea of strangers and their dogs having access to our space gives us great concern.
- Overlooking – With the current MOD fence, people are unable to look into our woods or our houses. This must be maintained once the rather ugly MOD fence is inevitably removed.
- Wildlife – We've been amazed since we moved here at the sheer amount of wildlife in this area. Specifically, we really worry that the deer population will be disrupted unless the entire north boundary is maintained.
- Noise & light – The Fersfield hamlet is incredibly peaceful – we would need to see how any proposals will mitigate noise & light pollution.

I attach the "consultation response form" with the same points above inserted into the concerns box. I also attach a document you'll have received from my neighbours already, which puts the points above into context visually, as well as providing a proposal for a solution to our concerns.

Representation ID Number: 2942 /

Although confident that the overall social and ecological (housing / recreational / medical /open space) issues are being properly addressed we are concerned that a failure to re-think the school-provision concept could have a devastating impact on the life and community cohesion of Combe Down.

Currently the school, Combe Down Primary (CDPS), 'though over-crowded and limited in facilities, is a vibrant and hugely positive catalyst to village life. The Deli (by the nature of its service offering) - and, to a lesser extent, the Co-op and Newsagent are natural magnets for parents of children at the school (and of Monkton Lower School since parents often switch children between the two establishments up to entry to senior school).

CDPS generates huge warmth and goodwill in spite of its severe limitations and, like so many good village schools operates right at the core of the community. The current proposal, though logical in terms of new school provision on a single site, ignores, at its peril, the effect such a proposal would have on CDPS and would dilute, and perhaps, destroy the immeasurable goodwill and strong social bonds developed in the community over many years.

The issue is simple - and, to be fair, the school's proposed solution imperfect - but, in our view, the retention of the current site 'as is' with a new and separate 'state of the art' Primary school on the new site would be socially irresponsible and would fail entirely to put "people first and communities at the heart of everything it (the Council) does" (The Council's Vision - page 2 of the "Draft Concept Statement". Faced with the choice of a cramped site, with several buildings well beyond economic repair and no adequate open play space, and a new purpose-built facility, most parents would opt for the new site, leaving CDPS to atrophy, thus throwing away all of the goodwill painstakingly developed between staff and parents / teachers. Those parents being awarded places at the CDPS site would, most likely, be resentful - resentment which, over time, would have a debilitating effect both on the school and on the village.

The arguments for a split-site school are laid out in considerable detail in the document submitted by the school ("Primary years educational provision at MOD Foxhill"). Whilst there would be some operational difficulties (eg parents having children at both sites necessitating staggered start and finish times) there would also be considerable benefit in bringing Combe Down and Foxhill residents together as parents would get to know both sites (and communities) as their children pass through the two sites.

In conclusion we believe, passionately, that the advantages of developing an enlarged 'Combe Down Primary School' over two sites would outweigh the inherent disadvantages of the proposed 'two tier' approach. Please do not risk losing the heart of Combe Down at the expense of a 'tidy' single new school solution.

Representation ID Number: 2943 /

Provide a Junior school which would link with the existing primary school in Combe down village, which would then able the village school to become the infant/ pre school . Combe down is in desperate need of recreational facilities,e.g. SPORTS CENTRE with affordable gym, swimming pool, sports hall, ten pin bowling, zany zone, community center, café ect, this could all be surrounded with woodland areas, gardens and duck ponds. All this would benefit people of all ages, bring employment and become a community focal point

Representation ID Number: 2945 /

I support the proposal by Combe Down Primary School as follows (from Combe Down Primary School web page):

"Looking at the long term view of the whole Combe Down community, the Governors favour the building of a new KS2 section of the school on the MOD site retaining KS1, Reception and, hopefully, Nursery provision on our current site."

I would add that after school child care provision would be very useful as part of any new school development plans.

Representation ID Number: 2946 /

We feel that to build a new Primary school in the MOD site would fragment the Combe Down community and not lead to cohesion. Depending of course on the social mix of the new site, there could be quite a division in the society. If the existing Primary school became the earliest years school, the school provision on the MOD site could house the older Primary School years and also a new school on the MOD site could have playing field provision, access to green surfaces and more space for the older children which the present Primary School site lacks. In this way there would be cohesion in

the Foxhill/Combe Down area and also improvement over all for the provision for the education of all these children. The two schools would helpfully come under one Head Teacher.

Representation ID Number: 2947 /

New Primary School

Please reconsider creating a brand new primary school. Given that Combe Down Primary is very keen to create a split site school (Infants and Juniors) this would be much more likely to create a feeling of Community across Foxhill and Combe Down. A new school would actually be more divisive.

Combe Down is an excellent school with a strong sense of community but is unlikely to be able to "compete" with a new primary school that will be able to offer better facilities and outside space.

This is a wonderful opportunity to ensure that some of the pupils currently at Combe Down can also benefit from the redevelopment of the site.

Furthermore, St Martin's Garden Primary is already available to members of our Community but is significantly under subscribed. Has the impact of a brand new primary school on St Martin's Garden Primary been taken into account?

Existing Foxhill site

Foxhill housing is already often viewed negatively across the area. I am concerned that it will become even more so if it is right next to a fabulous new development.

Has the Council considered ways in which to improve the existing Foxhill area to ensure that there is not a marked divide between the two communities?

Also, it is important that the affordable housing is not developed in such a way that it clearly stands out as such and those living there are seen as the "poorer" neighbours.

Representation ID Number: 2949 /

Pleased to see the principle of mixed development including employment uses

Pleased to see access arrangements and particularly that Perrymead is not proposed as an access (though this would probably be impossible in any event)

Pleased to see the principle of keeping development away from the skyline

Representation ID Number: 2950 / 2

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: 2952 / 1

I am a resident of Combe Down village and have been petitioned by the Governors of Combe Down Primary School to put forward my concerns regarding the redevelopment of the MOD site.

I agree that CDPS does not have enough suitable space now.

I agree a new purpose built school near (though I doubt as near as they claim), could render the current school a "poor relation".

I have carefully considered the options put forward by the school and as a community member do not agree that a new

purpose built 3FE school with sufficient land for classes, sport and parking would kill the village.

My opinion is that this is probably a unique opportunity to build one purpose built, environmentally friendly, primary school ON ONE SITE to cover current and future intakes. It would not be sensible to split the school unless it is absolutely necessary. The logistics of pick up from different sites and teachers and headmasters moving between sites is not desirable. Traffic would actually increase as parents who currently walk, would not be prepared to put in an extra mile (at least) to cover the two schools. Finally, in the long term, would it not be more economical to maintain purpose built, more efficient buildings than to service two sites, one of which will need considerable funding to adapt and then maintain.

Representation ID Number: 2962 /

I am very concerned about the proposal for a new 1FE primary school. It seems futile, divisive and not economically sensible to build a single form entry primary school so near to Combe Down Primary School. The existing school has huge numbers of children and not enough space to accommodate them, especially in terms of outdoor space.

The school community and parents put forward the idea that a far more sensible approach would be to build a new 3FE junior facility on the MOD site. This would allow far more space for the growing children and what would then be the existing 3 form entry infants. The existing building could also accommodate an early years centre.

Furthermore, if it is all part of the same school, this will help build the community rather than divide it. Schools are one of the best ways of integrating a new community. If the people who live on this new development only take their children to a school there, they are never going to interact with the wider community.

The authority have a duty to all the children in Combe Down to provide them with excellent provision and should use this opportunity for all the existing children, not just the next wave of new residents.

I am also concerned that the term 'affordable housing' will turn into social housing, in which case 35% is a very large percentage next to an area that is already dominated by social housing. Of course we need affordable family homes and desire an integrated community. But we need to balance that with how attractive this area will be for potential new buyers, and we don't want to lose the distinctive character of the village. This is what attracted me to come and live in this area.

Representation ID Number: 2966 /

Integrated Communities and Facilities

1st priority Utterly unsustainable if this new development does not effectively integrate.. Particularly for the existing Foxhill community.

Low Carbon Sustainable Development

2nd priority Essential globally and locally

Accessible for Walking, Cycling and Buses 3rd priority BUT the really big issue is the extreme lack of capacity of existing road network – never designed for the car. Currently the pedestrian & cyclist are VERY ill served on the network local to the site. This is the most pressing strategic issue which has to be dealt with for the sustainability of the new development AND the existing community

A range of green space for people and wildlife on the site

The development of community wardens, including young people – with authority support is essential for 'ownership' of this.

Retained and new tree planting . What about investigating the possibilities for coppicing the existing overgrown coppice and starting a small social enterprise supplying the increasing number of locals with woodburning stoves?

Makes connections to existing local natural areas A defined footpath down to connect to Lyncombe Vale/ Perrymead/ Greenway Lane/Two Tunnels i.e. providing a clear footpath into central Bath, would be a great idea. Link along Ralph Allan's Carriageway would be brilliant. This should include a contour hugging cycle path away from the main road (which because of its relative flatness) is the obvious cycle route, but SO compromised by the narrowness of the existing

carriageway and car driver behaviour.

New opportunities for wildlife habitats and ecology

Link to the two boxes above

Design strategies to save energy costs and water and reduce waste

Careful street layout that effectively makes it difficult to drive everywhere throughout the estate – see Nieuwland in the Netherlands as a good example of this. Permeability is separated and pedestrians and cyclists get the most direct and clear movement opportunities. Sustrans should be involved. SUDS a necessity as well as rainwater harvesting throughout the site. THIS SHOULD BE AN EXEMPLAR INTEGRATED AND SUSTAINABLE NEW 'COMMUNITY OF IDEAS'...

Innovative and exemplar sustainable homes (Code Level 5/6)

The more future proofing the better.

A range of developers (including HAB and similar small scale developers)

Site wide low carbon energy production infrastructure The City of Ideas CANNOT be restricted to central Bath. It MUST make it up the hill. This could be a real boost to innovative existing and new embryonic Bath area engineering consultants and manufacturers – as well as a significant economic generator.

A new primary school and early years facility

This is essential and needs to link to the existing Combe Down school. A real opportunity for

Integration with and support of existing local facilities and services

A suitably located high quality community facility which links new and existing Foxhill. Again this must enable disabled and supplier only vehicle access i.e. pedestrian access should overwhelmingly predominate

Up to 2000sqm (25,000 sqft) of space for office based employment

I think that without small engineering, Hi-tech, crafts and small business start-up units and a training facility (link to City of Bath & or other local providers) the new employment space will encourage rather than discourage car movement.

Have its own sense of place and character areas

High quality BANES commissioned and led Master planning process is essential for this. The speculative developers have such a bad record on this

Development will protect the World Heritage Site & setting of listed buildings and heritage assets This is directly related to the quality of master planning and the design values of the developers.

I love the idea of using Bath stone where necessary but because of the relative and prohibitive costs involved, I would rather the money be spent on high quality local designers and crafts people. The sustainability of 18th century Bath relates to design quality, attractiveness of location (including employment & income generation) and short and long-term design flexibility. These are the principles that need to be promoted in the new development. BANES is the only body who have such integrated concerns and it should take the lead

The development should be integrated with neighbouring areas

This is my 2nd highest priority. One key way in which this can be made more effective is if BANES retain responsibility for the development of the Master planning and for this to include the existing Foxhill community

Higher density lower car ownership development linked to buses, walking and cycling An essential. However a major issue is the significantly poor and uncompetitive existing public transport in the area. A significant investment in efficient and effective public transport system is essential to make this work. Ralph Allan's Drive had one of the modern ages first ever tramway systems (designed and built by a Bristol Engineer!) Why not a tram system which links Odd Down Park and Ride, Foxhill the University (Wessex Water and all the schools) and down to the footbridge by Widcombe Parade to the back of the railway station – Integrated transport.....

35% of "affordable housing"

As long as these are entirely integrated and are not an island/enclave within the private dominated housing

Opportunities for Self Build Homes

I would be very interested in this option

Design homes to allow for home working

Essential if we are to reduce private car movement

Integrated route for bus services

Integration is very important. However the biggest constraints on current bus use are cost and reliability. Currently it costs more than £5.00 return from Foxhill to Bath...if you have kids....this positively encourages car driving or worse – social exclusion. First Bus have a REALLY poor record and reputation....this is the strategic issue... Clearly the integration issue needs to consider and improve services on the existing Foxhill network too

Safe and accessible streets and cycling routes

The integration with local networks is essential. However as mentioned previously the existing road network is both seriously over-capacity and ill serves the pedestrians and cyclists – many of whom are school age young people (providing the appropriate solution to the obesity and sustainability agendas etc.). Consultation with residents and an integrated and strategic vision for transport of the whole area is the only solution.

Maximise connections to adjoining areas

Absolutely, but in ways that MINIMISES Car movement. Hawthorn Grove is getting more and more through traffic. We campaigned and got a 20mph limit (with associated and essential physical traffic calming measures) BUT principally residential roads, like Hawthorn Grove are becoming major through routes -this is unacceptable and unsustainable.

Design for 'shared space' streets

Essential. I cycled through 'The Dings' (by Temple Meads)- a supposed exemplar shared space – and car parking was still dominant. Sustrans and other specialist advice givers - rather than non-walking and non-cycling highway's engineers, need to be consultants/designers.

The concept statements are really very good indeed, but the integration of the new development into the existing is so absolutely essential, that this needs some more emphasis.

Foxhill as an existing community has a number of long term issues which need to be addressed if the new development is to encourage and become part of a sustainable community.

The only body that can make this effectively happen is the local authority: they should take responsibility for and lead the master plan for the new development and the existing area too.

We cannot leave this to the MOD's preferred developer.

The current highways and transport infrastructure around the site is seriously over-capacity and discourages sustainable modes. This has to be challenged through strategic action not piecemeal tinkering. This is the case CURRENTLY and will get SIGNIFICANTLY worse & less sustainable with a doubling of the Foxhill population.

Employment opportunities within and around the new development are essential, as is a SERIOUSLY improved public transport service, in order to give a real alternative to the car or increasing social exclusion.

Representation ID Number: 2968 /

Integrated Communities and Facilities

1st priority The new must be integrated with the current area

Accessible for Walking, Cycling and Buses

SAFE /2nd priority there is already an extreme lack of capacity on the existing road network and it is not safe

Green Spaces for People and Nature

3rd priority protect and enhance the countryside and open spaces in and around the site.

Concepts statements are very good .But will any of it really happen?

Sainsbury's in Odd Down was built and some of the community didn't want it.

There is not enough mention of integrating the present area with the new particularly in terms of traffic organization.

There are a range and number of schools and early years settings in the surrounding area: St. Martins Garden Primary, St. Martins Garden children's centre, Sunshine Preschool, Bath Opportunity Preschool, 3 Ways (Special needs) school, The Link 'behaviour' school, St Phillips in Odd Down and Combe Down Day Nursery, Combe Down Primary, Monkton Combe School,(Private) Prior Park School, (Private. As a result there is a constant flow of pedestrians, cyclists, children scooting in either direction especially down Bradford Road.

Alongside this are those who already travel by car to these destinations and those who travel to Wessex water and other businesses. In the residential street of Hawthorn Grove there is a large industrial business: Sydenhams, which means lorries and large delivery vehicles frequent Bradford Road, Entry Hill and Hawthorn Grove throughout the day blocking streets and reversing or trying to turn around, when they realize they have arrived in a residential area.

It is essential that the council makes sure that the MOD's preferred developer takes into consideration the current highways transport infrastructure around the site and adjoining areas as stated above it is already at serious over capacity and discourages sustainability as it is unsafe to travel as a cyclist or pedestrian and is extremely expensive for public transport and poorly served presently.

Employment opportunities are essential within the new development, transport and leisure activities to enable 700 plus new people and all the existing people to have a better quality of life and opportunity without this planning it will become a drain on the councils resources in the future anyway.

Representation ID Number: 2969 /

MoD Foxhill – Comments on Draft Concept Statement

Further to the Council's request for comments on the Concept Statement, we have set-out our comments below. As background, our property is part of the Fersfield Estate, which forms the northern boundary of the MOD site.

Although we are broadly happy with the Concept Statement, we would like you to note the following:

We believe that opening the 'carriageway' needs to take into account the privacy issues that that this will create. The proposed carriageway will allow walkers clear views into our properties that do not currently exist. Depending on how this is lit, it also creates potential light pollution issues.

The Concept Document appears to make no mention of how the boundary will be delineated. The MOD currently maintains the boundary via a chain link fence, which a developer may want to remove. If this is removed, it will likely create issues with inadvertent trespass – it should also be noted that there are several steep drops that are dangerous.

As proposed in the attached document, these issues can be obviated by moving the boundary back slightly, building a boundary wall and creating a slightly raised walkway that would allow users of the path better views of Bath, whilst helping with privacy/trespass issues.

Representation ID Number: 2971 /

We are concerned that a new primary school will create divisiveness for the community where the communities are trying to work together. This will only create a "them and us" across such a small distance - The current proposals do nothing to help sort out the lack of space that the current primary school faces.

There's an overwhelming opinion amongst parents (of the current school) and residence in the community that an infant and junior school will work really well to bring the communities together.

Representation ID Number: 2976 /

The MOD concept statements for Foxhill, Enleigh 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: 2977 /

I would like to support the Combe Down Primary School governors in their view to build a Key Stage 2 (Junior) section of a primary school with the current primary school site being changed into a Foundation and Key Stage 1 (Infants) section of the same school rather than a entry primary school provision. As my son currently attends CDPS I can see myself how crowded the site is. I believe that by creating a single school split site the children will benefit most of this great opportunity.

Representation ID Number: 2982 /

I am extremely impressed with the proposed development of the three MOD sites and wish to express an interest in the land set aside for business purposes.

Whilst I appreciate that your vision refers to office space I wish to propose an alternative use of a combined dance and fitness studio at Fox Hill. This would not only benefit the local community, but reach out to a wider network and strengthen links between communities.

Dance is an activity that attracts all ages. Young children love to move to the newest music and older generations enjoy the discipline of ballet and the accompanying classical compositions. It is often viewed not as exercise, but as a fun and artistic activity. It is important to keep the community physically active, whatever their age and fits in well with BANES' commitment to promote health and wellbeing.

A dance/fitness studio in the heart of a new community would be a place to integrate communities and facilities. Essentially, it is a new health facility for all to access. The benefits to the local community would result in fitter, more active families with a space that all ages can enjoy using. This in turn would be advantageous to the city by providing a new venue that would draw in other communities and encourage a positive outlook towards dance and fitness.

The site at Fox Hill would be an ideal location with excellent transport links. Having lived in Bath all my life I am aware that there is no purpose built dance studio in the immediate vicinity and the likelihood of a suitable building becoming available is minimal.

To support my idea I have prepared a Business Plan which demonstrates that a Studio is financially viable. I already teach 12 classes per week and all members, I anticipate, would come with me. The feedback on those canvassed has been favourable. Local shopkeepers would no doubt benefit from the additional footfall.

My qualifications are as follows - I have a dance degree (BA Hons) from Chichester University and also a Certificate of Higher Education from London Contemporary Dance School. I have been teaching in Bath and surrounding areas for 8 years specialising in ballet, tap, contemporary and street dance. More details can be found on my website www.k4kimdance.co.uk.

My requirements would be as follows - a floor space of 100 square metres (anything less would not be financially viable). I should also like to own the Studio and be responsible for all outgoings rather than pay rent. An empty shell would be preferable as special flooring is required plus mirrors, barres and sound proofing. Good daylight is essential, windows should not be sighted at ground level for privacy.

Representation ID Number: 3058 / 1

The number of allotments locally should be increased by 10% using MoD Foxhill land as these act as good meeting points

for the community.

Somewhere should be provided for young people to be able to kick a ball about.

Representation ID Number: 3060 / 1

Perhaps 10 years or more ago when the sale of the MOD sites was discussed, I prepared a plan for the development of a sports club (similar to the Lansdown Tennis club) at the northern end of the Foxhill site.

The reasons for this the suggestion was that the tennis courts could be close to the skyline and usually any buildings such as club houses are single story and hence the club would perhaps be sited on land that could not be used for housing.

Combe Down has a shortage of sports facilities for people over 30 particularly females. There are football and rugby pitches and it is a pleasure to see the Glasshouse field in full use with the players in their cricketing whites. However since the closure of the Civil Service club access to other sports has been limited. This includes social bridge clubs who have had to find alternative accommodation.

I would envisage the club to consist of the following:

- a. 8 or so tennis courts
- b. 4 squash courts
- c. Croquet lawn
- d. Clubhouse and changing rooms
- e. Fitness room
- f. Spare room for hire to outside organisations.

It may be there could be an indoor bowls room to complement the Bloomfield club.

Note that Lansdown Tennis club run courses for juniors during the school holidays and this would be helpful to the youth on Combe Down. I previously commented on the planning application for the location of the cabins on the Glasshouse field about the antisocial behaviour. There would seem an improvement since the field has been smartened and the gate always locked. However there is still further to go and kids on Combe Down deserve some help as there not too much for them locally.

BANES has a GET ACTIVE section and a club of this sort would be in accordance with those objectives so can BANES support be assumed.

As an aside, the concept statement omits any consideration of senior citizens and perhaps the following may be helpful.

It is assumed by politicians and others that people when retiring move into smaller properties. The converse is true in that more space is required as your home then includes your workplace. There seems to be a presumption that the elderly will occupy apartments but most of my friends and colleagues appreciate their garden and some in their eighties still walk perhaps 5 to 7 miles once or twice a week. One, an artist, has a wooden studio in her garden for the natural light.

Additionally a lot more time is spent at home so space is needed to avoid being a 'battery hen' particularly in winter when perhaps ill health or inclement weather prevents going out for 2 or 3 weeks particularly for chest infections.

There seems to be a considerable number of 3 story townhouses being constructed which are not suitable for old folk. If practicable self contained developments such as The Paddocks at Corston should be considered as the elderly residents there tend to watch out for each other and have social functions on their green during the summer months. Also they work together to maintain the common ground.

If two storey accommodation for the elderly is included, please try to ensure that the stairs have wide steps and are of 90 degree turns rather than triangular treads. Two of my friends have fallen down their stairs (one aged 90), luckily without permanent injury after a few days in hospital.

Also include a garage somewhat larger than normal. A colleague has a complete workshop in his and by necessity, I have a treadmill, exercise bike and other exercise items in mine.

The recent proposed changes to taxation and planning changes to granny flats and annexes are mostly inapplicable until semi-infirmity strikes, hopefully not before the age of 100.

As another aside, it is not entirely conjecture that the UK may follow the PIIGS group into similar economic difficulty and hence the early years facility mentioned in the Concept Statement may never be used as the return on that investment is usually classified near zero.

[Letter to Don Foster MP below]

Dear Mr. Foster,

1. Around 10 years or so ago when the Ministry of Defence was considering selling their sites, I wrote suggesting that a sports club be established on the northern end of the Foxhill site and enclosed a few documents. My recollection is that your reply supported in principle this proposal. The time has now come for a more serious consideration perhaps.
2. I enclose a copy of my correspondence to BANES.
3. The next requirement is to find prospective committee members and I am in contact with several members of local sports clubs. Hopefully 12 or more people will volunteer to serve within the next few weeks.
4. Although I will not be involved due to my age as a committee member, for your information I will offer to:
 - i. Prepare a constitution for the club very provisionally named by me as the Combe Down Sports Club.
 - ii. Register the organisation at Companies House
 - iii. Similarly register the organisation with the Charities Commission
 - iv. Prepare a site plan assuming the MOD will permit access
 - v. Prepare a provisional layout plan sufficient for assessment and planning purposes.
 - vi. Prepare a time based bar chart plan including costings starting with fundraising through to construction and final handover.
 - vii. Prepare a business case derived from the plan.
 - viii. Prepare a very provisional web site where people will be able to register an interest and pledge a donation.
5. I shall require some help for a couple of the above items but hopefully the assistance already offered will not be withdrawn.
6. I would be grateful if you would ascertain that the MOD would be prepared to negotiate with the Combe Down Sports Club if established and whether any concessions may be offered. Any advice you may be able to offer would be appreciated including if possible the name, department and address of the person handling the sale for the MOD.
7. Please note that you may receive a somewhat similar request from the Combe Down Rugby Club who I understand are contemplating extending their playing area.

Representation ID Number: 3062 / 1

Development of the MOD Site at Foxhill: Input to the draft concept statements

We are writing to you on behalf of the Governing Body, the Teaching and Support staff, the Parents of pupils and the pupils of Combe Down Primary School (CDPS) about the proposals in the draft concept statement to build a new 1 Form Entry (FE) Primary school as part of the infrastructure requirements for the redevelopment of the MOD site at Foxhill.

We are concerned about the impact this draft proposal will have on community cohesion and the creation of what will end up being, under the current proposals, two primary schools within 500 metres of each other.

We also believe that this is a once in a lifetime strategic opportunity to address a fundamental problem of lack of outdoor space that CDPS has, plus also an opportunity for sharing infrastructure with other community users such as Combe Down Rugby Club.

Background to current issues faced by Combe Down Primary School

CDPS is a 2FE Primary school. The site has a total area of 7,900m² though over 900m² of this is on a steep slope and unusable.

Although classroom sizes are mostly adequate, playground space is severely limited. The school has no playing field and no natural grass for recreation. Playtime is a crowded activity and the sort of games that the children are able to play are limited by the space available. The school has to use playing pitches at nearby private schools, but these are only available out of school hours when those schools do not require them. This can mean that pupils have to return to school some time after the end of the school day to attend after school sports clubs.

CDPS has the lowest site area per pupil of all primary schools in BANES.

In addition to this, several of the school buildings are life expired, storage space is inadequate and small group teaching spaces insufficient in number (often the Headteacher has to vacate his own office to provide a room for special educational needs and other focused teaching).

Furthermore there is no parking for staff, let alone parents and visitors.

The deteriorating building issue could be addressed with funding: we have recently engaged a local architectural firm to carry out a feasibility study for a replacement build that does not encroach on the precious playground space. A replacement build is likely to be in the order of £1.5m- £3m.

Our primary issue is the lack of much needed recreational space - a problem that cannot be addressed without a strategic opportunity such as the one presenting itself now.

Our concerns about the current draft concept statements

We are concerned about the draft concept statement's proposal to build a new 1 FE Primary school only as part of the redevelopment of the Foxhill MOD site.

In the opinion of the community of Foxhill and Combe Down, whom we represent, we feel strongly that the proposal as it stands will cause two main problems:

1. A divisive arrangement for Primary years' education in the community

A new primary school would be built to the latest excellent building standards. Building Bulletin 99: A briefing framework for Primary School Projects sets out area guidelines for primary school buildings and sites.

CDPS site and building area falls woefully short of both these guidelines and the reduced space standards recently announced by the Department for Education:

BB99 guidelines Area in m²

1 FE Primary School

Gross Building Area 1,750

Gross Site Area 10-11 ,000

2FE Primary School

Gross Building Area 2,600

Gross Site Area 17-19,000

2FE Combe Down Primary School (actual)

Gross Building Area 1,740

Gross Site Area 7,000

Not only would a new primary school have more building and site space, but the new provision would provide a far better learning environment for the children of today- with contemporary design, eco features and modern facilities.

CDPS is on a cramped site with some temporary buildings over 30 years old and indeed several classes are in a building over 100 years old with poor natural lighting, ventilation and heating. In our opinion the current proposal would create two tiers of school provision within a few hundred metres of each other, with CDPS being viewed very much as the poor relation in terms of physical infrastructure. Therefore we believe that the proposal in the draft concept statement will create significant feelings of inequality within the same community.

2. A negative impact on community cohesion

We believe that a new primary school would inevitably form the centre of a new central hub separate from Combe Down village and Foxhill village centres.

The current village centres and shops desperately need additional customers as they compete with bigger businesses further afield. We want to retain the life in both Combe Down and Foxhill and not dilute it further.

We know from local knowledge that designing new sizeable developments to ensure that the new residents mix with existing residents can often fail if the physical infrastructure required for community cohesion is incorrect.

MOD Foxhill Redevelopment - a Strategic Opportunity

The concept statements for the development site provide the ideal and only opportunity to address the issues mentioned above, before land prices are agreed with the developer.

We recognise the need for an additional 210 primary years places and there are several ways of meeting this requirement:

1. Option as per draft concept statements:

Build a new 210 PAN primary school with a playing field on the new development. Leave CDPS as is.

- Advantages: A simple arrangement whereby the infrastructure required is designed to meet the new development.
- Disadvantages: As discussed above. CDPS would be left as the poor relation, lacking in outdoor space, whilst the new development would be isolated rather than fully integrated into the existing communities.

2. Merge the two schools by converting CDPS into a 3FE Infant only section and build a new 3FE Junior section of the school on the new site with a single Headteacher and Governing Body • Advantages and disadvantages discussed below.

3. The inverse of 2. CDPS becomes a Junior section and the new build an Infant section

- Disadvantages: CDPS is not suitable for the current 224 juniors let alone increasing this to 360. Knocking down the old & temporary buildings on CDPS site will not create the playing field space which is key. We do not consider this to be a viable option.

4. Reduce CDPS to a 1.5FE primary school to free up space and provide a new 1.5FE primary school on the new site.

- Disadvantages: Two 1.5FE Primary schools would not be an economic proposition and therefore not a viable option.

5. Close CDPS and sell the land for development. Build a new 3FE primary school on the new development site.

- Disadvantages: This option would likely have a devastating impact on Combe Down village. Also, knocking down CDPS, where some of the buildings have plenty of life left in them would not be economically sensible. We do not consider this to be a viable option.

Our conclusion is that only options 1 and 2 have any merit for further consideration. Our proposal is that Option 2 is adopted because this would best meet the desperate need for adequate outdoor space for older children in Combe Down and Foxhill.

What is our Proposal?

Our proposal is that the concept statement should reflect the requirement for a new 3FE junior section of CDPS on the new site, allowing the existing site to be converted to the 3FE infant section of the same school. One school, one Headteacher and one Governing Body.

What are the advantages of this proposal?

The advantages of this proposal over the current draft concept statements are:

The lack of site space at CDPS, the issue of inequality of provision between two primary schools a few hundred metres apart and the risk of poorer community cohesion are addressed.

Providing the Junior section of the school on the new site (and near the entrance to the new development) and the Infant section on the existing CDPS site would be far more likely to ensure continued mixing and free flow of people between Foxhill village, the new site and Combe Down village.

Synergies with other community groups

Combe Down Rugby Club wish to extend their grounds to accommodate an additional rugby pitch. We see no reason why this should not present opportunities for joint use of open space for sporting purposes. For the rugby club too, this development offers a once in a lifetime opportunity to obtain the necessary extra land.

Converting CDPS into a 3FE Infants only section would release space to enable opportunities for much needed nursery provision as well as pre-school and after-school provision.

What are the disadvantages of this proposal?

We recognise that a new 3FE Junior section of CDPS on the new site would involve additional cost (12 classes rather than 7 or 8). The Education Department has stated categorically that no developer would fund this because it would be viewed as over provision for the needs of the development itself. However, we are aware of several examples where developers have done just that because they have recognised the needs of the wider community.

Moreover, it is likely that by the time planning permission is granted the Council will have implemented the Community Infrastructure Levy (CIL). The Council has already identified a requirement for three additional primary schools as something to which CIL would be applied. There is no reason therefore why there should be any additional expense to the Council since it could use CIL receipts to fund a 3FE Junior section.

We also accept that additional land would be required. However the gross building area difference between a 1 FE Primary and 3 FE Junior would only be about 0.07 ha. We believe there are plenty of creative opportunities to meet this difference in land take which would not involve the loss of land for other development, such as sharing playing field space with other community users and building double rather than single storey classrooms. In addition we are aware that the Council owned land of the Backstones (6,700m² approx) is underutilised and could form part of the open space provision required for the new development.

The National Planning Policy Framework (NPPF) 2012

In his introduction to the NPPF, the Minister for Planning, the Rt Hon Greg Clark MP stated: "In order to fulfil its purpose of helping achieve sustainable development, planning must not simply be about scrutiny. Planning must be a creative exercise in finding ways to enhance and improve the places in which we live our lives.

This should be a collective enterprise. Yet, in recent years, planning has tended to exclude, rather than to include, people and communities. In part, this has been a result of targets being imposed, and decisions taken, by bodies remote from them.

Dismantling the unaccountable regional apparatus and introducing neighbourhood planning addresses this."

Specifically about school provision the NPPF states:

72. The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

- give great weight to the need to create, expand or alter schools; and
- work with schools promoters to identify and resolve key planning issues before applications are submitted.

73. Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.

We firmly believe that our proposal meets the NPPF core planning principles and policies.

We have the support from the local communities of Combe Down and Foxhill as demonstrated by the attached petition and look forward to opportunities to progress this once in a lifetime opportunity to improve the community and educational provision in our area.

Representation ID Number: 3063 / 1

An "Evidence Base" should be commissioned covering the occupation of the three sites by the Admiralty/MoD, from their acquisition to their disposal.

To include a record of each building and its use (eg design), important infrastructure and other significant features of the three sites, before demolition and site clearance

One building should be identified (at Foxhill) for retention from demolition.

This building would, inter alia, tell "The Story of the Admiralty at Bath" from its evacuation from London to the closure of the sites (to include the Empire Hotel and other requisitioned buildings, the billeting of personnel and all other aspects of the presence of the Admiralty at Bath - military and social. The story would be told "in situ"

The retained building could be adapted for community use as, eg, a Local library and similar uses.

Hanging Lands Lane (aka Pope's Walk, Blind Lane) which is outside the MoD Foxhill Site, should be protected from change. It is an ancient route/boundary - see "The Survey of Bath and District no 23, October 2008"

Representation ID Number: 3065 / 1

The safeguarding of Pope's Walk/Hanging Man's Lane is welcomed and must be maintained.

No vehicle access to the site should be allowed from the east for two reasons:

- (1) The junction of Ralph Allen Drive/The Avenue/Bradford road is already very congested. Adding another road in that area would make it unacceptable
- (2) Allowing through traffic from east to west on the site would encourage a rat run especially when the Bradford road is congested.

Representation ID Number: 3068 / 1

I think the current concepts have not addressed the desire of the Combe Down community to remain a self-contained village rather than a suburb or dormitory for Bath. There seems to be a deliberate intent to link adjoining developments in a way that overruns the boundaries and identity of the Combe Down village.

I am deeply skeptical that "Higher density, lower car ownership development linked to buses, walking and cycling" is

achievable without reducing the density of home development (ie. fewer houses) and increasing the allocation of space for development with employment potential (ie. more space for offices and light industry). If the prospective residents are already living in BANES, as your literature implies, it is extremely unlikely (considering the major employers in Bath) that a significant proportion of them will be able to work from home and if they are residents simply moving into the BANES area to snap up a new build house then the burden of commuting by car will be even greater. Although I note your aspirations about affordable housing, the reality is that people do not afford this kind of new build housing without one or two jobs per household. Where are all these people going to work? For the vast majority, it won't be at home! There would need to be a step change in the quality of public transport to prevent a very detrimental increase in commuter car traffic.

To summarise my comments, the current balance in the allocation of space does not support a self-contained and sustainable village community where more people work close to where they live. Nor does it allow sufficient green space to allow people and nature to prosper together. I realise that there were legal complexities about the ownership of the land and MOD's right to sell it to their own profit, but I think that BANES should seek a better deal from the MOD to the benefit of the local community. A better deal for the local community would not be one in which the land is simply auctioned off to the highest bidder with a free mandate to develop high density housing.

Representation ID Number: 3070 / 1

Encourage pride in the area in which we live

Representation ID Number: 3071 / 1

The amount of homes to be reduced.

The view - the worry that all we will see is high level homes.

Traffic.

Social problems.

The tree line that lines Bradford Park being ripped out, as this is a pleasant sight, it softens the view of the buildings behind them. The trees also provide the nesting places for all of our garden birds, so they need to be kept.

The affordable homes could be warden controlled bungalows for the elderly, a much needed resource (e.g. Quantocks).

Please make paperwork, etc jargon free as a lot of people at the meeting found the draft pictures etc confusing, we are not up on architect/planning speak.

Representation ID Number: 3074 / 1

Please listen (and read) to the views of the residents of Combe Down, who value a semi-rural life style, especially being on the edge of a wonderful World Heritage Site - it would be a great pity to inherit a concrete jungle such as Southgate!!

Representation ID Number: 3077 / 1

We need proper affordable self-build projects which we can be involved in designing which can be zero carbon and low impact, innovative and put Foxhill on the map.

Representation ID Number: 3078 / 1

Please do your best, we don't want what has happened at Sulis Meadows, it is such a long isolated cul-de-sac!

Representation ID Number: 3081 / 1

We don't want more traffic chaos!

We feel that 2 primary schools will create a division in our community. Why not build one new one?

Would love a library.

Representation ID Number: 3082 / 1

I am really concerned about the proposals to have 2 schools so close to each other. Surely this will divide the community????

Also... the traffic! It's bad enough... 700 more houses and it will be terrible.

Representation ID Number: 3084 / 1

It would be good to have a community centre as part of the new development. This could provide somewhere for the older community to meet (at present there doesn't appear to be any provision for them in the plans) and also for the youth in the evenings. It could provide a venue for brownies/cubs etc right within the community.

The plans include a new single form entry primary school. It could work better to make Come Down Primary into an infants school and the new school could be the junior school. There is not much by way of outdoor space at the existing primary school, so the older children would benefit from more space. Also, it would make for a more cohesive community, integrating the existing families with the newer ones.

Home Design:

I don't know if the council is able to make requirements in terms of home design, but there was a recent article in the Daily Telegraph which cited a recent large study in the USA which found that children whose families eat together do better at school and are less obese. Some modern homes are being designed and built without a room to eat in – the assumption is that families will eat meals on their laps in front of the television. Would it be possible to make it a requirement that family homes have either a kitchen large enough to eat in, or a dining room close to the kitchen