

Representation ID Number: 96 / 3

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 / 3

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;

(c) 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

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

Levies

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

Representation ID Number: 224 / 3

The Warminster Road site concept statement clearly sets out the appropriate ambitions by the Council for a high quality, low carbon residential area, permeable by walkers and cyclists to and from the canal. We believe that there is scope for emphasising the need for choice of materials to be appropriate for long views (currently the use of Bath stone is mentioned only on facades facing the public realm) and also to mention the permeability of the site for adjoining residential areas, routes through the site for pedestrians, cyclists and cars can help provide greater integration with existing development and connectivity to the city.

Of all the sites, this one must promote reduced reliance on car use and ownership, and site layout should not be dominated by parking.

The extent of the site boundary needs to be made clear.

There is a need to retain a green buffer to the N and E of the site.

Concern that required provision of formal open space and allotments may be difficult to achieve on site's steep slopes.

Detailed response

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 and the need to respond positively to them.

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

Page 3

Issue: Site analysis should include the listed terraces in London Rd - draft had insufficient emphasis on visibility to/from Grade I listed Grosvenor Place across river.

Suggested change required: Strengthen site analysis, and response to setting of listed buildings.

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 historic environment considerations. The section on scale and massing should be brought up and given more emphasis, with more specific reference to the evidence base.

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

Page 6

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

Suggested change required: Strengthen reference to traditional and high quality palette of materials, stating natural slate, rather than 'dark coloured slate', and timber/metal framed windows.

Page 7

Issue: Environmental performance refers to suitable low carbon initiatives, mention should be made of the energy efficiency of terraced or part terraced formats. Offer guidance for energy saving preferences and design principles for solar panels and green roofs.

Page 10

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: 227 / 3

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

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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: 266 / 3

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: 279 / 3

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 / 3

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 / 3

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

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

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

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

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

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

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

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

Representation ID Number: 904 / 3

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: 1366 / 3

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.

With reference to the MoD Warminster Road site which relates to the “provision of a new pedestrian and cyclist bridge over the canal and railway”, Network Rail would have to give technical approval of any bridge design that crosses the operational railway and require that the bridge be built with a minimum 5.1m headroom clearance above the rail, these are Network Rail’s current requirements for the electrification of the line.

No work should be carried out on the development site that may endanger the safe operation of the railway or the stability of Network Rail’s structures and adjoining land. In particular, the demolition of buildings or other structures must be carried out in accordance with an agreed method statement. Care must be taken to ensure that no debris or other materials can fall onto Network Rail land. In view of the close proximity of these proposed works to the railway boundary the developer should contact Richard Selwood at Network Rail on AssetProtectionWestern@networkrail.co.uk and enter into Basic Asset Protection Agreement before any works begin.

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

Developer Contributions

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

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

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

contributions to fund such improvements.

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

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

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

- ☒☒ A requirement for development contributions to deliver improvements to the rail network where appropriate.
- ☒☒ A requirement for Transport Assessments to take cognisance of impacts to existing rail infrastructure to allow any necessary developer contributions towards rail to be calculated.
- ☒☒ A commitment to consult Network Rail where development may impact on the rail network and may require rail infrastructure improvements. In order to be reasonable these improvements would be restricted to a local level and would be necessary to make the development acceptable. We would not seek contributions towards major enhancement projects which are already programmed as part of Network Rail's remit.

Planning Applications

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

Representation ID Number: 1449 / 1

Ensure it is mixed use development as large employment spaces are being lost.

Representation ID Number: 2611 / 3

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% 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 rapidly. More recent analysis for example from Zero Carbon Hub suggests that by 2017 the added premiums will have halved to between £3000 and £8000. We believe the council's supporting document 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

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meet this commitment because of the prevalence of listed Georgian properties. We predict that new developments in Bath may be forced to compensate for the older building stock and as a minimum will have to be built to carbon-neutral or even carbon positive standards.

d. Retrofitting to a higher standard is expensive: once a property is built to a lower standard it is much more expensive to then have to upgrade it to a higher standard. We believe this cost is several multiples of the original cost. The usable floor areas of properties are often reduced if for example internal wall insulation is installed during a retrofit. In the medium to long term it may be more efficient and economic to develop to the higher standards to avoid significant additional expense of having to retrofit the property to meet 2050 standards.

e. "Allowable Solutions" should not be allowed: this approach may allow developers to avoid meeting future carbon neutral building regulations by making offset payments, similar to carbon offset payments on airline flights. Developers are concerned with the extra costs to meet the new standards and argue it would be cheaper to invest in alternative carbon reduction schemes outside their developments. Typically this could reduce cost premiums by 70%. We believe this is short-sighted because in the long-term the overall cost is likely to be far greater because of the need for retrofitting. Meanwhile the costs of making a building near carbon neutral are rapidly reducing

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

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

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

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

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

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

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

Renewables

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

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

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

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 Landings' 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' 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 RIBA's 'Case for Space'. 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 plot 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. 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.

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 Stroud 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 Enleigh 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 Group 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 Enleigh 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 Enleigh 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 Enleigh 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 fabric. 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

Schedule of comments: Consultees's suggestions and concerns

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 three) schools in Bath. The likely consequence, if no additional provision is made is that primary school children would have to travel even further than they have to do today to get to school, increasing pollution and congestion in the local area. As part of the evidence base for this scheme we would be grateful if the council could explain how provision for primary school children will be achieved?

Representation ID Number: 2673 / 3

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: 2779 / 1

Warminster road is already very busy and at times a dangerous road used by far too many articulated lorries. With the new development there will be estates on both sides of the A36 and much crossing to and fro. Speed restrictions will really have to be reinforced and traffic calming measure introduced.

Bearing in mind the shortage of Primary School places within the Bathwick area it is incomprehensible that the education of young children has not been considered. Bathwick St Marys school already has to 'shoe horn' children into the school and CANNOT take more without increasing the premises. As a playing field has been mooted for almost 10 years now why not leave a section for this, coupled with a pre-school room and reception class room on the site. It would show that the council is interested and concerned for the people in the larger community and want to help with the integration rather than appearing to make it a profit exercise. Is the 200sq.m office really necessary? Could that not be used for school premises?

Representation ID Number: 2795 / 1

As the site is next to a primary school there will be unfair pressure on the local community for school places.

Representation ID Number: 2805 / 1

The school must be able to flexibly grow and respond to pupil numbers/demand for places from local children. It will need sufficient space to do this.

Representation ID Number: 2807 / 1

Green space for local primary school, avoid splitting primary between two sites. Traffic a potential issue, car parking etc. Ensuring houses complement the architecture of the area.

Representation ID Number: 2808 / 1

Schedule of comments: Consultees's suggestions and concerns

Height of buildings - may block view for existing residents in Minster Way.
 Minster Way permit parking zone to remain as Minster Way only - residents concerned as we may have nowhere to park.
 If traffic increases concerned that it will be difficult to cross the road (A36). The road can already be difficult to cross.
 Current bollards and refuge should be retained.

Representation ID Number: 2809 / 1

Access onto Warminster Road
 Low housing, not to block views from main road
 Retain space between Bathampton and MoD site
 Shop on site - Bathwick shops not adequate for general store requirements of 140 houses - would also be used by Minster Way etc.

Representation ID Number: 2810 / 1

The popular primary school desperately needs more space! It needs a sports field, a larger car park, improved access (new entrance?) and since this is government land it ought to be available for the school to have what it needs, before the rest is sold off!

Representation ID Number: 2811 / 1

Appreciate there is need to build/use the MoD site effectively. 2 main concerns as a very local resident.

Traffic/pedestrian safety
 Warminster Rd is already a very busy route, and pavement from Minster Way to Nath road is very narrow. As a parent with a toddler (and another baby on the way) I am very concerned about the impact of increased traffic. There have already been some 'near misses' with lorries/cars driving too fast down Warminster Rd towards the city centre. There is no safe crossing point before the traffic lights at Sydney Road. In particular North Road is a nightmare to cross with traffic coming from 3 directions and a blind bend. As this development is so close to the city centre (and therefore people are encouraged to walk) surely there has to be a lot of consideration given to traffic slowing/pedestrian safety measures? I feel an additional pedestrian crossing between North road and the proposed new entrance to the housing site is needed.

Capacity of Bathwick St Marys school
 Concerned over lack of school places with an increased number of houses on the schools doorstep. This school is already in the top 3 for most over-subscribed in the city. Clearer indication of provision for this needed in the plans.

Representation ID Number: 2812 / 1

Safe access from site to A36 and impact on existing road network.

Representation ID Number: 2813 / 1

I am very concerned about the inevitable increase of pressure/demand on schooling in the area. A successful solution to this and the satisfactory provision of playing fields for the school must be a priority.

Representation ID Number: 2814 / 1

minimise risk of land slippage due to water beneath thin surface cover
 Protect water sewage and gas supplies from effect of water seepage.

Please protect views over Bath from upper corner of site
 Please provide zig-zag path from upper corner down to present Canal bridge and railway. I don't want the existing rights of way diverted to the new bridges.
 Please provide play/recreation area close to school for school and local childrens use.

I should like to know of any changes or additions to vision, or development principles to be included in concept statements so that I may comment on them.

Representation ID Number: 2815 / 1

Schedule of comments: Consultees's suggestions and concerns

Are the 130 houses/flats going to have adequate parking e.g. minimum 2 spaces per household?

Will there be a residents parking scheme on new development? If so, this should have a different zone number to roads such as Minster Way/Beckford Gardens etc.

Will Bathwick St Mary school be expanded/re-built to cope with increased pupil numbers? If so, will admissions policy be more flexible in future?

What about secondary places?

Representation ID Number: 2816 / 1

Living opposite the MoD, I am concerned that high rise buildings will spoil the view over the valley. The A36 is a very busy road already. The new estate will add to the density of traffic and the noise we have to put up with.

Representation ID Number: 2819 / 1

the MoD need to take a community view. This is a one off chance to
 Improve the school facilities (its one of the best in county)
 Improve the buildings and provide housing
 Improve of the views of the site from elsewhere in Bath

1. I like
 The emphasis on green principles
 the access via Warminster Road
 The protection? Of school traffic
 the protection of BATS
2. I would suggest
 FEWER HOUSES AND USE THE SPACE TO PROVIDE SPORTS FACILITIES for local school (could be used by community outside of school hours)
 Additional investment in Bathwick St Mary's to accommodate extra demand for school places
 Speed limit of 20mph in the development to protect children
3. A set of objectives that subordinate one of financial gains to longer term community benefit
4. Restrict height of development to one storey buildings
5. Need to protect views from Canal with low level development - don't build on green fields
6. Protect badger sites

Representation ID Number: 2820 / 1

Build on grey/brownfield land only
 Provide a large play/green space for the school at the Western Edge
 Ensure only very good architects are appointed.

Representation ID Number: 2822 / 1

Presumably the school will have to be extended. If so, could the parents/visitors entrance be incorporated into the Warminster Road access.

Representation ID Number: 2824 / 1

Concerned about increased traffic on A36
 Concerned about blocking the view from top of the site adjacent to Warminster Road
 Maintain existing right of way to the canal

Representation ID Number: 2825 / 1

Access to development could cause concern. If a roundabout is constructed would be unhappy if sited opp. Minster Way entrance as this is well-used. Further up the A36 would help slow traffic down.

Representation ID Number: 2826 / 1

The 'Sheep Field' is the place where many tourists stop to take photographs; if the developer is allowed to build into this site then one of the attractions of Bath will be removed.

I think it is important to try and restrict development to the area to the west of this field as otherwise the city really is expanding beyond its boundaries.

Representation ID Number: 2828 / 1

The concept has opposite ambitions -

1. high quality
2. Affordable housing

This area is better suited to quality rather than affordability

The prejudice against car ownership i.e. personal mobility is misconceived if not actually anti-social

Representation ID Number: 2829 / 1

I would welcome positive support for self build and also to facilitate the small developer, within the whole development.

Representation ID Number: 2831 / 1

Would like to see 'traffic reduction' plans especially as new devt. Is promoting low car ownership and walking and cycling

Representation ID Number: 2833 / 1

The brief should include for local on site school provision in expansion of existing Bathwick St Marys School. A land exchange for residential could be considered. Local shops and facilities need to be provided, both of these are required to make for a low car use sustainable community.

Representation ID Number: 2837 / 1

I am concerned that a new, ultra modern development will spoil the views and light. Houses overlook this area and it has the potential to be even more of an eyesore. Other concerns are noise pollution, huge increase in cars and traffic, loss of greenery. I would suggest that this form could have been written in laymans English as it appears intentionally difficult to read and analyse.

Representation ID Number: 2840 / 1

Do not provide for self build - its untidy and less visible on the local other sites.

Playing field essential for Primary School.

Don't double the size - it would not be the same school

Avoid reflective surfaces on house roofs, they would ruin the area.

BANES should purchase and reserve land for employment. Look ahead 15 years and manufacturing will be reviving.

A surgery with disabled access would be viable I reckon

Several separated homes for ex prisoners and addicts should be included.

Representation ID Number: 2857 / 1

*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: 2859 / 1

Schedule of comments: Consultees's suggestions and concerns

In favour of developing site for housing main concerns cycle/walking routes - I see new canal and railway bridges specified. Presumably these would access Hampton row - a cycle friendly bridge over railing at end of hampton row would be a great improvement.

Could this be combined with making existing footpath down to river footbridge and Kensington a proper paved cycle route giving nearby traffic free access to Larkhall?

Representation ID Number: 2864 / 3

I believe it is essential to use brownfield sites with their existing amenities, such as fence etc

Representation ID Number: 2871 / 1

St Christopher's Close are a well established community already - the houses are attractive and desirable due to proximity to good schools and the city - have you researched and considered the impact of this housing estate on us, its immediate neighbours, the value of our houses etc I see no reference

The well established and very successful 'community' of Minster Way and St Christopher Close comprises of approx. 109 houses - this seems a workable site. Your development is too big - too much emphasis on the 'pepper pot' scheme

This side of the city would be very suitable for accommodation for the elderly - sheltered and independent - like Avon Park. This type of development would certainly reduce care use and would maximise the attractive nature of the site in terms of maintenance.

The school has an excellent reputation and is over subscribed an influx of families would put great strain on admissions and is a cause of great concern to the 'indigenous' population

Representation ID Number: 2872 / 1

less houses

No roundabout on the Warminster Road

More partnership or shared purchases for 1st time buyers and key workers etc

Less rental

Some solution to the increase in numbers at the local school

Considering the potential increase in elderly people predicted why is there no reference to retirement/disability etc in the draft concept

Representation ID Number: 2881 / 1

Think that the green area around footpath going up from current bridge should be kept free of development. It is the only long view free of development as walking to Bathampton.

Think should have a footpath going on up the hill from the other side of W Road to open up hill more (circular walk would be wonderful)

This is an area viewed by most of Bath so feel houses should reflect world heritage status (Georgian copies) or less than 3 storeys high. Very important scenically to walkers. Feel that if this is overlooked there will be a lot of angst!

School needs a field!

Representation ID Number: 2898 / 1

It would be helpful to remove parking from Warminster Road and put in some traffic calming measures to slow traffic coming in to the Sydney Gardens/North Road junction.

I think 140 homes is too many to attract the correct income bracket that it is hoped to attract. Which school will the children go to?

Will there be "village shop" in the development?

Schedule of comments: Consultees's suggestions and concerns

The site must be secured once the current occupiers leave and until work on the site starts, we do not want squatters to move and force an expensive battle to eject them.

Representation ID Number: 2900 / 1

This development is aimed at low vehicle ownership. Now that most families have two vehicles is there going to be sufficient parking available within the site as the Warminster Road is already used by commuters and visitors during the week and used by certain barge residents who regard it as their personal car park sometimes staying for weeks. The present situation already causes problems to HGV movement and as there is very little provision for pedestrian crossing (there has recently been a serious pedestrian accident) therefore sufficient parking must be provided on the site. What provision is to be made if any for the already heavily used doctors and dental surgeries In the area?

Representation ID Number: 2903 / 1

Height of the buildings is a concern (see previous comment)

The retention of the existing trees.

Is there Asbestos on the site i.e. a legacy from the central boiler system?

Light pollution from the new site could be a problem for those 'looking over' the site.

The suggestion of a roundabout on the A36 would increase noise and air pollution for the existing properties facing the road i.e. vehicles braking, stopping/starting and no doubt it would mean additional light pollution. Two entrances/exits would be more beneficial.

The retention of the two footpaths between the A36 and the canal.

Representation ID Number: 2915 / 1

We live in Darlington Road and are overlooked by the MoD. I would be very concerned if the narrow green belt (meadowland) between our boundary fence and the MoD was utilised for housing/office buildings. I note the concept of a pathway for pedestrians/cyclists linking onto Darlington Road at Bathwick primary school. There are some 12 houses plus Emery's Yard (including heavy truck access) and the school at the convergence of these drives/roads involving heavy traffic within a very limited space. There is also the traffic from Bathwick Rise and the flats/other houses in Darlington Road. Increased pedestrian/cycle traffic will be dangerous at school opening/closing times. Gaining access to Beckford Road is already a hazardous operation due to the volume of traffic. It is particularly difficult to turn right. This difficulty is exacerbated as the view is impeded by the parked cars on the road just before the Darlington Road exit/entrance. I suggest the cycle traffic to/from the new estate could be routed via the proposed bridge over the canal/railway. The design/route layout for cyclists/pedestrians should ensure that access is targeted to those living on the new estate. It would be wholly inappropriate if the access to the estate was utilised by pedestrians/cyclists as a 'cut through' to Warminster Road or Beckford Road.

Representation ID Number: 2916 / 1

IMPACT ON PRIVACY OF EXISTING HOMES: Development should try to minimise the impact on the privacy of residents in existing properties bordering the new site. At the south west corner of the site, the meadowland is at its narrowest (ie bordering Vila Rosa/Orchard Leaze/The Lodge). Support retaining the meadowland with an 'abrupt edge'. Sensitivity should be shown regarding the height of any new buildings close to this boundary to avoid the existing properties being overlooked and losing private enjoyment of their house/garden. **RETENTION OF MEADOWLAND:** Strongly support the retention of the meadowland and the 'abrupt edge' with attractive walling plus hawthorn (or similar) planting to avoid 'general roaming' of this protected area. This will help to protect the enjoyment of quiet meadowland of both existing residents in properties adjoining the site and those in the new development. **RANGE OF BUILDING HEIGHTS:** Agree the need for sensitivity to maintain countryside views from canalside. As above, sensitivity should be shown regarding the height of any new buildings close to this boundary to avoid the existing properties being totally overlooked and losing private enjoyment of their house/garden. Existing developments along the canalside (bungalows at the far end of Darlington Road) had height restrictions imposed at the time of build. This, together with their unobtrusive design, ensured the retention of an attractive treelined landscape along the canal route to the city. **PEDESTRIAN/CYCLE/PUBLIC TRANSPORT ACCESS TO THE CITY:** Support the idea - in principle - for safe pedestrian/cycle access to the city from the new development and beyond. Current bus route/stops seem well positioned. Query outline plans for cycle/pedestrian route through and out of the development to join up with Darlington Road. The proposed pedestrian/cycle route would go past a recent new build (terrace of 5 houses) and join the bottom end of Darlington Road. There is currently a convergence of FIVE drives/roads at this point: a private road serving 5 houses; the recent build serving 5 terraced houses; a further 3

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private driveways and - just beyond this - the school exit road/parking bay. This junction has become far less safe since the recent build of the 5 terraced houses. When approaching the 'junction' from the private road, there is no clear sighting of either the road from the terraces (which would be the new pedestrian/cycle way) or Darlington Road itself. Currently, great care has to be taken when approaching this convergence - predominantly to be on the lookout for other cars. Very few pedestrians seem to use the existing foot path to Warminster Road but if this was to increase and if there were cyclists in addition, it is potentially a danger spot for collisions of people/cars/cyclists. It would be something of an eyesore (and detrimental to this end of the road with the attractive trees/greenery and discrete housing) if there was a lot of safety signage. Darlington Road is also excessively busy at certain school times (morning arrival/lunch departure/afternoon arrival/afternoon departure) with cars/parents and children creating a lot of moving obstacles! In addition, the junction from Darlington Road onto Warminster Road is not an easy one for cars - turning right OR left; the same difficulties would apply to cyclists. There is poor sighting to the right (area for parked cars block visibility) and cars speed up the hill to beat the lights making turning onto the road - right or left - problematic. The current walkway around the MOD site does not seem to be well used by pedestrians. With the potential for additional children attending the school from the new development, consideration might be given to retaining the current walkway from Warminster Road but with an additional side entrance into the school grounds - thus avoiding the 5 way junction at the end of Darlington Road. Alternatively, if there is a determination to retain the pedestrian walkway from the new site to join Darlington Road as suggested in the concept statement, this could remain but the cycle link could be routed from the new site (and/or from any new bridge if this was built) - exiting from the main exit/entrance and/or emergency exit/entrance. At these exit/entrance points there would no doubt be proper traffic management systems in place (roundabout/markings etc) to enable safe crossing of roads should the cyclists be going in the direction of town. However, if there was a new cycle path from the site over a new railway/canal bridge, there seems no particular benefit - or justification of expenditure - to create a wider cycle path from the site to the end of Darlington Road; ie cyclists could access the Kennet/Avon Canal route from Warminster Road across the new bridge rather than via Darlington Road/Beckford Road. DRAINAGE: Whilst this is probably more detail than is being addressed currently in the concept plans, I am assuming that there will be careful planning of the drainage - particularly surface water - to ensure that the development does not increase any danger of flooding of existing properties further down the slopes, beyond the meadow area.

Representation ID Number: 2917 / 1

It's a big site, so no need to build on land not currently built on.

The green corridor into the city of canal/railway/river is a precious resource and should not be compromised.

The canalside environment is a heritage and nature resource and should be preserved, even extended...

Representation ID Number: 2919 / 1

The site could accommodate a greater housing density than suggested

The site covers 7 ha, but 140 houses are suggested on the basis that the developable area is 80% of 4.34 ha (SHLAA refers). However, considering the whole area of the site, the average housing density is 20 houses/ha, well below the current B&NES Local Plan policy HG7 which seeks 30 houses/ha. To help achieve our district-wide housing target, we should be aiming for a higher density, say up to 180 houses (which would still be less than 30 houses/ha overall), leaving sufficient green spaces for public access. A mix of housing types could be incorporated into the design, including 35% affordable housing. I note that the Concept Statements for both Foxhill and Ensleigh have suggested densities of around 35 houses/ha.

Sustainability and low energy demand should be key features of the housing design

The site offers an excellent opportunity for developers to offer high quality and innovative low carbon designs. This ambition is reflected in the Concept Statement, but the starting point should be at least 20% of housing with these features, not 10% as suggested. The small development of 5 houses by Emerys in Darlington Road which is immediately adjacent to the site shows what can be done to achieve CSH5 or CSH6. Along with high standards of insulation and energy management, the site should benefit from renewable energy systems such as building integrated PV and ground source heat pumps. A further option is the use of district heating, possibly using biomass boilers, as is planned for the later stages of Bath Western Riverside.

The energy costs in the Evidence Base are not convincing. At this site there will be substantial numbers of dwellings, and the developers should be able to achieve economies of scale in providing high levels of fabric energy efficiency and low

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carbon solutions. I suspect that the cost data are based on one-off or smaller scale developments, and the actual cost uplifts to deliver CSH5 or CSH6 may be lower than the report indicates. The recommendation to have a possible allocation of a portion of each site to achieve houses at CSH5 or CSH6 may offer a practical option for developers, but I suggest we use this as a negotiation point rather than an upfront statement. The list of design and construction principles (4.1.2) in the Evidence Base is very sensible. This will help in starting an early dialogue with the developers in relation to energy matters.

The site is well positioned for ease of access into the city centre. I welcome the suggestions of low car ownership and the emphasis on sustainable transport modes by linking the site via cycleways and pedestrian routes to the existing infrastructure. A new footbridge over the canal would be especially useful. A new footbridge over the River Avon would also encourage walking and cycling.

A local shop would be more useful to the local community than employment facilities

Office accommodation is suggested, but a more useful option for local residents would be a local shop catering for groceries, newspapers etc. If the shop was located sensibly at a pull-off on Warminster Road, it would benefit from passing trade as well as local customers.

Consideration should be given to a new 2 form entry primary school

On its own the population living on the site would not be large enough for a new 210 place primary school to be needed. However, primary places in the city are in great demand, and the local school is Bathwick St Mary Primary, which lies immediately adjacent to the site on Darlington Road. This school is very popular and successful, but does not have any room for expansion within its current footprint. The Governors of the school have indicated that they are interested in pursuing the suggestion of a new 420 place school on the Warminster Road site, by replacing the existing school and including a possible land swap of the current school site. A new enlarged school would serve the local community more fully, address parental preference and reduce home to school travel. The new school could feature a modern sustainable design with better vehicle and pedestrian access and with a requirement to be integrated with the housing development.

The current B&NES Local Plan has in para B3.31:

...it is acknowledged that particularly in Bath, there is a shortage of land for development. Should a site that is not allocated in Policy CF.5 (which lists land allocated for primary educational purposes) come forward for the development of educational facilities, it will be assessed under Policy CF.2 together with other relevant policies in the plan.

A further consideration is the provision of a sports playing field for Bathwick St Mary Primary school on the Warminster Road site. This has been a long standing ambition for the school. The current B&NES Local Plan has in para B3.33:

"A need for a playing field to serve St Mary's Primary School in Bathwick has been identified by the Council, but there are currently no suitable sites to locate such a facility. However, should a site for a school playing field come forward it can be considered against Policy CF.2 and other relevant Local Plan policies."

Representation ID Number: 2922 /

Setting the Scene: Background information

The school which has been on its present site since 1986 is an Infants and Junior school that serves the parishes of St Mary and St John as well as the wider local community. The proposed 140 dwellings on the adjacent MOD site will also be within the parishes of St Mary and St John.

If the school remains the same size as it is at present with its very limited scope for enlargement there will be serious increased pressure and competition from families on the new adjacent MOD development and this will be the cause of unfair pressure on the existing local community for places at the school. Indeed, if the school stays the size it is and the MOD land is developed as is planned, the school will be unable to support its immediate community (new and old) in the way it should.

The school is a cohesive 'primary school'. Most importantly, our 'Collective Worship life' is centred on the hall where we all

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meet together three times a week in addition to Key Stage Worship. Junior children known as blue hats mentor infant children during play times and at other points in the school day; the infants watch junior productions in the hall at Christmas time and on other occasions - and vice versa; the School Council consists of both infant and junior representatives; and children of different ages form bonds with each other as part of their early years schooling.

It is a vital part of the school ethos that both juniors and infants continue to learn and relate together as an integral part of their primary education.

We as governors, therefore, are committed to keeping the school as a single unit. If BSM school is moved and increased in size, following development of the MOD land, it must not be separated into infant and junior schools over two sites as this would have a negative impact on the fundamental ethos of the school and would alter the fabric and atmosphere of the school.

Key Effects of Development on the School

The key effects of development on Bathwick St. Mary site have to be seen within two particular contexts:

a) The first context is if the Warminster Road site is considered 'in isolation' alongside the current school site.

- The Warminster Road site development is predicted by the Local Authority Officers to generate an additional six children per year group – or approximately forty to fifty children across the school. However, a local architect has suggested that potentially 140 new homes (most for family use) could generate many more new children on our doorstep. Presumably our school would be the school of choice for the new residents (next nearest Bathampton). It would also be the most logical if the low car use sustainable community idea is to have any sense. This will cause pressure on the limited places of a relatively small single form entry school and potentially displace other local children in the catchment area. Alternatively, it will cause long travel distances to more distant city schools, which will probably be taken by car leading to increased car use and further city centre congestion. Therefore it makes sense to extend / rebuild Bathwick St Mary on the current site or to do a land swap and build a new school on part of the MOD land.

- Extending is difficult with the design and site constraints of the existing school. It has limited land and 'level issues'. The only way to expand is probably upwards - to make more of the school 2 and even 3 storeys. This will make for a very compromised arrangement and it would be very disruptive. The school would have to move out into temporary accommodation on an already tight site

- The current limitations of the existing school site also make it impossible to increase class size limits by even a small amount – and this includes pressure on its facilities such as toilets, playground space and shared spaces like the hall

- Any additional 'buildings' that may be proposed to ensure that sufficient classroom, shared space and other facilities were provided, would: first and foremost be located on the Warminster Road site itself; in effect, be creating a 'two-form entry primary school' as the Governors do not wish to introduce 'split year groups'; it would be physically separated from the other existing buildings and the sense of community and community cohesion would be lost

- The Governors have been in close communication with the Local Authority over ten years now to secure a playing field for the school. It had been indicated for some time that when the MOD land was eventually put up for sale, this consideration would be part of any development plans

b) The second context is if the Warminster Road site is considered as part of the overall MOD land available within Bath and the Local Authorities' plans for on-going housing development in addition to this new land [a possible school site for a two-form entry primary school]

- The Governors are very willing to be part of a strategically developed school that would be increased to a two-form entry provision on ONE site with facilities (including a playing field) to match. The buildings and grounds would hopefully support the Governors current drive for sustainability and ensure that the children would be able to see and utilise at first hand, how buildings and space can be designed for sustainable 21st Century living. We would hope that the Council would see it as a sustainable flagship in this very special space within the 'Kennet and Avon Canal corridor'

- The school has always been oversubscribed and this would also support parental preference (in addition to increased demand from any in-fill on the existing school site and elsewhere locally)

- Sustainability would favour a community school in this area – preventing unnecessary and problematic traffic congestion elsewhere in the City

- The school has long been promised its own playing field – should the situation arise – and this would be one of the few opportunities (if not, THE opportunity) when this can be addressed

- As the Council considers its overall plans for school places within Bath, there will be very few sites that can accommodate two-form entry primary schools and continue to address parental preference. The Council therefore will need to look at our school as part of the strategic plans it has in mind rather than in isolation with the Warminster Road site

- From the current Concept Statement the Council does not appear to have considered any effect of the Warminster Road site development on the present school or local community

In conclusion, the Governors have agreed that they would prefer to see a new two-form entry Church primary school being built on the MOD site and will be in discussion with the Diocese to progress this option.

The Governors would be very happy to discuss any points raised in this submission at any time.

Representation ID Number: 2924 / 3

I am writing to express my views on the proposed Bathwick St Mary / MOD Development project.

As a parent of two girls, one in Reception at Bathwick St Mary, and one about to start in September, it seems to me a total "no-brainer" to use this opportunity to build a two form primary school.

We are active members of the Bathwick St Mary Church and live only 0.6 miles away in Great Pulteney Street, but are very aware that we only narrowly got a place for our eldest daughter. Certainly, she would not have got in at the school if six or seven places had been taken by new families on the development site. Our second nearest school is Widcombe, but as we are on the edge of the catchment area we would very likely not have got in there either (especially with other local children displaced from Bathwick). This would mean that we would have had to drive to whatever school we ended up at, adding to city centre congestion but also faced the stress and upheaval of being on a waiting list for our local church school. Having been married at St Mary's, and had our children christened there, we would have been devastated not to be able to send our girls to our local church school.

Bathwick is always the most subscribed school in Bath and clearly, if a big chunk of extra housing is going in, the school needs to be expanded to a two form school, or future families for whom Bathwick is their nearest school, are going to be excluded.

The site is already cramped and in need of a playing field, so expanding the current site would not work and splitting the school would spoil one of the things that makes the school so special, i.e. the integration and interaction of the Junior and younger children. Bath should be proud to have one of the UK's best primary schools, and I trust BANES will be doing everything possible to support the opportunity to create a two form school,

Representation ID Number: 2926 / 1

I'd like to raise an objection to the inclusion of the sheep field in the plans for housing. It is beautiful walking down through the field onto the canal and safe for children too. My family can walk from the sheep field all the way to Alice park without using roads. This is such a benefit to us living in an urban environment. The Warminster road is very busy with cars and lorries and is noisy. The sheep field keeps the balance.

Thank you for listening

Representation ID Number: 2930 /

I wish to express my concerns regarding the impact of the proposed development of the current MOD site on Warminster Road in Bath on Bathwick St Mary primary school.

I understand the projections for numbers of extra children per school year is to be 6 or 7 but that others feel there may be

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many more than this. I already have a daughter at the school with a son due to attend in September. We live on Beckford Gardens so within the extended school community.

I hope the school can be accommodated on the new MOD site with dual form entry. Any increase in class size at the current site would be detrimental to the excellent standard of education the children receive and as has been pointed out, the school is one of the most oversubscribed in Bath so there would presumably be no problem in filling the places.

If the catchment area was any smaller due to increased pressure on already very few places this would mean many families having to use their cars for the school run every morning, currently the walk to school in the mornings is one of the highlights of our day as we see and catch up with the other families on the way.

We would be very sad to see the Infant and Junior schools separated, the junior school children look after the little ones not only when they start but they also provide a great deal of support and inspiration for the infants throughout the school. The juniors are worthy role models for the younger children and give them something to aspire to and work towards.

We hope that there will be provision for a school playing field in the old MOD site, the school do the best with their limited outside resources but in these times of greater emphasis on healthy living and exercise, giving the children a proper playing field so they can do both structured field sports and team activities and also have some freedom to run around and get great exercise at playtimes is an invaluable use of this new land resource.

I hope these comments are taken into consideration.

Representation ID Number: 2933 / 1

We are concerned about the effects of the development on Bathwick St Mary Primary School. The school is routinely oversubscribed currently and the planned development would only increase the numbers of families seeking school places – particularly with the emphasis on low car ownership and the promotion of cycling/walking – of which we are supportive. The school could not be extended on its present site and the plan does not appear to consider the idea of building a new, larger school on the Warminster Road MOD site. We feel that this option must be included for consideration at this stage.

Representation ID Number: 2940 / 1

Principle of Use

I am opposed to the development of primarily housing on the site and request that the site be allocated primarily for high quality employment uses such as knowledge intensive, creative and high tech uses. The following sets out the context including the distribution of proposed employment space, and analysis of the issues.

The Bath Economic Regeneration Delivery Plan identifies the need for promoting a range of sites to attract higher value sectors such as creative industries, ICT and low carbon industries. The Economic Strategy for B&NES highlights how important the right office accommodation is to support Bath's sustainable economic growth. It needs an appropriate range of premises and sites which are attractive to the skilled resident population to work from in the city. Modern business space and facilities are also essential if the city is to attract and retain businesses in target sectors and build on its economic strengths.

Business space is identified for both the MoD Foxhill and Ensleigh sites (2000 sq m for each site). However, investment in employment development, particularly the higher value knowledge intensive industries that the Council wants to foster and attract to the City, is very sensitive to location and environment factors. Occupiers of these higher value industries require high quality environments, with easy access to the city centre, so that the staff can access the city centre facilities. This accords with the sequential approach to concentrating uses which attract large numbers of people to within or on the edge of centres to maximise the use of public transport and encourage linked trips to other uses. The Warminster Road MoD site fits these criteria, whereas the MoD Foxhill and Ensleigh sites do not meet these requirements.

In addition, in order to obtain a critical mass of development – a cluster – there needs to be a concentration of office / business premises. The proposed business use allocated to MoD Foxhill and Ensleigh should therefore be refocused on the Warminster Road site. Indeed, it is unlikely that there will be a demand for office and business uses in the primarily residential areas at Foxhill and Ensleigh. Clearly it would be better to maximise residential units on these sites.

Other uses

I support the proposal for allotments on the site as part of the open space within the scheme.

I understand that the primary school has no easy access to a playing field. A shared playing field – serving the school and other users - will encourage sports activities, which is beneficial to the health of the pupils and accords with the council's promotion of a healthy city. A playing field should be incorporated.

In conclusion, the Warminster Road MoD site should be reserved primarily for employment uses. The existing proposal is a wasted opportunity for a prime site in Bath, and will not assist in promoting Bath in accordance with the council's vision for sustainable economic growth.

Representation ID Number: 2941 / 1

As already mentioned we are, I believe, the closest property to the MoD site (flanked on two sides) and, as such, my main concern would be to protect our privacy and, currently, unspoilt views across to Larkhall and beyond across the Woolley Valley. Consequently, height, proximity & density of proposed buildings is foremost in my mind and I would expect the sense of 'openness' experienced by our property, and those of our direct neighbours, to not be effected.

I would expect that the shoulder height of buildings not exceed those of nearby buildings – likewise overall height and, as advised in Nicholas Pearson Associates 'Site Concept Statement: Evidence Base' "...resulting buildings do not intrude on views and should preserve and enhance the green character of the area"

The councils vision for Bath & North East Somerset includes 'Unique places with beautiful surroundings' – well that also describes our property perfectly... and I would not expect that to change.

I would expect that a proportion of the undeveloped natural areas and meadows - particularly along the green corridor - be protected, as an important contribution to the World Heritage Site and Bath Conservation area.

I would expect consideration be given to Bathwick St Mary's Primary school, which currently has no green space – I know financial contribution to off-site provision is suggested in the concept statement. And also consideration of the impact of the new residential area on the current capacity of this very popular school.

Increased traffic to this area is of concern – the rear access to Bathwick St Mary's Primary School falls on Warminster Road – at the point where it already becomes particularly congested. You also have children crossing the road to-and-from King Edwards School on North Road – accessing the bus stops.

I would also expect a positive road approach to the City and also to Bathampton be maintained.

Finally, we have heard that there is consideration being given to a possible retail outlet (shop) being sited in the current location of the reception building at the existing entrance to the MoD. As this sits directly next to our property I do have concerns over privacy – being overlooked, hours of trading and the noise associated with such – so am raising these concerns now.

Representation ID Number: 2944 /

As a parent of two children at Bathwick St Mary's school and a resident of Bathwick, I would like to comment on the Draft Concept Statements for the Warminster Road MOD site.

Before I give you my comments I would like to thank you for arranging the consultation meetings at the school which I found extremely helpful.

I feel strongly that this land sale gives the city a unique chance to expand Bathwick St Marys School, one of the best primary schools in the country. If this opportunity is missed, the Council will be left with a growing number of children this side of Bath who will not get into their primary school of choice and will have to be driven across town to their second or third choice school.

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My reasons for wanting to expand Bathwick St Marys Primary School are as follows:

1. Bathwick St Marys School was recently awarded State Primary of the Year by the Sunday Times's Parent Power publication for its consistently high academic achievements. I know that Bath as a whole needs to expand its primary provision so it makes sense to me to expand the best performing school in the country. (It would be criminal not to!)
2. I am a Governor of Bathwick St Mary's and fully support the school's position in relation to the MOD development. I am conscious that whatever happens on the site will affect the school – and if the housing development goes ahead as planned in the Concept Statements – this will have an adverse affect on the school as it will put pressure on existing local families. Already the school is hugely oversubscribed. This year over 80 children applied for 30 places and in the last few years the applications have been treble the number of places.
3. I personally agree that as the school stands at the moment there is no way that it could 'absorb' the 40-50 primary school aged children that the site would generate. (You only have to visit the school briefly to see that the school would struggle to add a single pupil). Space is a major concern for the school – there is a lack of car parking space , a lack of space for music lessons, a lack of space for cookery lessons, a lack of playground space...
4. In your Infrastructure Matrix you state on page 8 (under education) 'Potential space required for expansion of adjacent school - contribution equivalent to one classroom'. If this statement refers to Bathwick School then to me this shows a complete lack of understanding of the situation. Adding a classroom onto Bathwick St Marys will NOT solve the problem!
5. I feel very strongly that Bathwick St Marys School (and the Council and Church) has a duty to provide for the children in the surrounding community. At the moment it can only provide for a selected few – and the new MOD development will just make the situation worse.

A new double intake primary school would solve all these problems and provide first class education provision for many generations to come.

Thank you again for facilitating this process

Representation ID Number: 2950 / 3

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: 2953 /

I attended the council's presentation at Bathwick St Mary School a couple of weeks ago and spent some time speaking with the planning people there.

As a parent of two children who attend Bathwick St Mary, my main concerns are around the school, and extra primary school children who will require places as a result of the new development.

I understand from your provisional plans that you are suggesting a mixture of 2 and 3 bed flats, and 2,3,4 and 5 bed houses. I also note that you think that this will generate around 40 children for which you will receive a Community Infrastructure Levy of around £550,000 from the developer.

With that in mind, my thoughts are:

1. I suspect there will be more than 40 primary children needing a school place. With so many 3, 4 and 5 bed houses, the councils numbers seem low (Secondary school numbers are unknown).
2. Bathwick St Mary does not have the capacity to accept any more children. In the infants (Reception, Y1 and Y2) the class sizes are already 30, which is the maximum under government guidelines. Y3 to Y6 are either 33 or 34. The school is full. Trying to squeeze even another 6 children (one per year) in the school will leave the school at breaking point. Clearly, there is no room to absorb the extra 40+ children who the council are planning for. Adding an extra external classroom to the building does (as initially suggested by the council) not fix the problem either, as the new school children

will be spread over many different year groups.

3. Bathwick St Mary is an exceptional school which was recently named in the top 10 performing schools in the UK. This high performance comes from a number of factors (head teacher, teachers, demographic/catchment area, faith school, active parents). Because of this, the demand for places at Bathwick is very high. I believe each year, around 80 children apply for 30 places.

There are many options available to the school and council. Here are my thoughts on a few of them:

Option 1: Do nothing.

The school has no legal duty to provide for the new school children, and is not in a position to do so (as things stand). With this option, the council (or parents) would have to bus/taxi/drive the 40+ children to other schools over Bath. This will add to traffic congestion in Bath.

That said, I'm sure some of the children from the new estate will take places from existing local residents whose children would normally go to Bathwick St Mary. This will ruffle a few feathers with local residents.

Option 2. Make Bathwick a dual intake school and build an new infant school on the MOD land, leaving the existing school as a junior school (Y3 to Y6).

Becoming a dual intake school would take the pupil numbers from the current level of 225 to 450. The school would therefore need an additional similar size piece of land to the existing site (approx 1 hectare) to build the infants school on and provide a playground area and staff car parking.

I understand from speaking with the planning people that the cost of a new school would be around £4m (+ land?). I don't know who would pay for that.

If the council paid for this, would this still make Bathwick a church school run by the diocese of Bath and Wells?

I suspect not, possibly it would make one part of the school a council run school (i.e. infants) and the other part a church school (i.e. juniors). I suspect this would have an effect on teaching, and essentially divide the school in a similar way to Widcome. This does not seem a satisfactory arrangement.

Option 3. Build a new dual intake school on the new MOD site and sell the land of the current site.

This is probably the most ideal solution (and the school governors preferred option), but is fraught with complications. I understand building a new dual intake school will cost around £6m (+land?). This option would need at least 2 hectares and would devalue the land of the MOD. Also, it is unknown at present if the diocese can sell the exiting land which Bathwick St Mary stands on.

The advantages of a new dual intake church school on the same sites are plenty. But financially, who would pay for it, who would own it, would the developers/MOD support it?

Option 4. Other options such as making the existing school two or three story, or adding more outside classrooms seem non-starters. This is either too disruptive or leaves the school with no outside space.

Option 5. (my preferred option). Build a new single intake school in the parish of Bathwick (possibly on the MOD site and possibly have it run by the church).

I believe children should go to primary school within walking distance of their homes. I think Bathwick St Mary is a well run and successful school, but there is no clear way to expand, and it should therefore not be tampered with. Certainly, there shouldn't be any pressure to squeeze more children in there.

Therefore, my preferred option is to build a new single intake school close to the new estate (i.e. possibly on the MOD site) -- and invite the church to run it. I don't see a problem having two different 'high performing' schools close by

Representation ID Number: 2954 /

1. Right from the start, I said it would have been much better if you had come to the residents FIRST, to allow our input to this. Instead, you have wasted money on consultations with are at times ill-informed. There is a real sense of anger around here that we were not consulted prior to these plans being drawn up.. Everyone locally is dismayed at the lack of knowledge about the transport difficulties, the nature on site, and particularly the cramped position of the school – a developer can throw all the money he likes at the school, it cannot create more ground when there is none there. But this school is highly regarded – if you allow family homes on site, they are going to want their children to go there, even though

it is horrendously over-subscribed already.

2. Another issue which has been raised, by myself and others, is the fragility of the site geologically. There is hardly a house in Minster Way which does not have settlement cracks, and some, including my own have had more worrying signs. I have had an extension built which has foundations 1.5 metres deep, part of its purpose being to hold the house on the hillside. A house in Trossachs Drive has had to have massive underpinning. A developer should be aware that the hillside – has a substrata of clay – not as fine as Fuller’s earth, but clay all the same – and that there are numerous springs in the area. Building on this site is going to require great care, and frankly, it would be best suited to small starter homes and old people’s accommodation than large houses. The higher you allow houses, the deeper the foundations are going to have to go.

3. There is great concern about traffic. Firstly, no one can see how you are going to enforce low car ownership. If you allow family homes, there will be more than one car. If you restrict parking on site, where will they go? No prizes for guessing – the only place they can go is Trossachs Drive. (Minster Way has a parking scheme – we were hoping to see its removal when the admiralty went, but your low car ownership plans have scuppered that. Furthermore, how are you going to control the entrance to the site? Only recently, there have been skid parks across the pavement where a lorry must have had trouble braking when a car made a late decision to turn into the site. You are going to have to slow the traffic somehow. A roundabout sounds at first like a good solution – but what of the added pollution and traffic noise? Also, by mid-morning on Fridays (and sometimes Thursdays) the traffic begins to queue at the ill-conceived Bathwick traffic lights. By lunchtime, it is queued back beyond Bathampton. People are doing U-turns, going through Bathampton to reach the tollbridge instead etc. You are going to have to rethink the whole thing. My plan would be to stop all heavy traffic – including coaches and bendy buses but allowing the small buses - using Pulteney Bridge, but to allow light traffic over it.

4. While I know there is a nature survey being done, nature does not always show itself when you want it. The sheep field is a great nature resource. There are badgers in the vicinity, also bats, great spotted woodpecker, buzzards which come down from Bathampton Down. In my garden I have a huge variety of birds, including great spotted woodpeckers, nuthatch, goldfinches , all sorts of tits, blackcaps and bullfinches. If the field goes, I fear that many of these will go as well. They are not resident in my garden – they are coming from somewhere – and the field is part of the corridor they use. The farmer tells me there are also interesting plants there.

Representation ID Number: 2958 / 1

I support the following proposals...

Having the main entrance to the site located to a more central location further up Warminster Road. As its current location is where the road narrows and often gets congested, and is not far from the rear access gate of the local primary school – Bathwick St Mary’s

The idea of creating an open space for the aforementioned local primary school ‘Bathwick St Marys’s’ - whose needs I feel should be of particular focus within the development.

Trying to work within the current site foot print therefore trying to keep as much of the green surrounding area as possible.

The new footbridge over the river.

However, a major concern would be:

The proposal of a retail outlet situated at the current location of the reception area at the main MOD entrance. This is right next to our property and would directly overlook our garden. There would also be issues with the trading hours of a proposed outlet and the noise associated with it. This will also affect the flow of traffic which I have already eluded to in my earlier point.

I also have real worries and concerns over the height of the proposed houses which are due to be built. As the MOD site flanks two sides of our garden this would have a real impact on both our privacy and currently, unspoilt, views. However, I appreciate at this early stage you can’t really answer questions on this.

I would really appreciate it if you took the above concerns into account when talking to potential developers of the site

Representation ID Number: 2960 /

I am writing to you to express my views regarding the development of the MOD site on Warminster Road.

I am broadly in favour of the development - the site cannot be left as it is and housing seems the most appropriate solution as it is in keeping with the surrounding area.

I would particularly like to express my views regarding the opportunity that the development may bring to expand Bathwick St Mary's primary school. Both my children have attended the school and it is excellent. As one of the best primary schools in BANES it would seem a brilliant opportunity to expand the school to two form entry - either by building an entirely new school building on a new site, which is larger and more suitable for a modern school, or by building a junior/infant school in the new development, allowing the current building to be used for the other half of the school

I would be very much in favour of using this opportunity to expand the school

Representation ID Number: 2961 / 1

I am writing about the proposed development of the M.O.D.site on the Warminster road and would like to make the following suggestions:

1. That there should be a large shop on the site to cater for the essential needs of the occupants of 140 houses.
2. That there should be a roundabout outside the entrance/exit of the site to keep traffic along the Warminster road moving.
3. That there should be an easily accessible footbridge over the canal, enabling people to reach the London road and shops.
Without this, there will be a tendency to use cars to reach larger shops.
4. That there should be clearly demarcated cycle paths on the site and stands to park bicycles, with rails to allow them to be locked into position.

Representation ID Number: 2972 /

As stated above, I would like the redevelopment to include a playing field for Bathwick St. Mary's School. If Bathwick St. Mary's School needs to be enlarged as a result of the development, I would like the school to be a single site two form entry school, not a split site school. Bathwick St. Mary's is currently an outstanding school and the community across the whole school (infant and junior) is a very important part of this.

I would also hope that there would be green spaces and amenities to be used by all of the local community, but particularly primary and secondary age children.

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: 2978 /

Because of its location, topography and prominence, the Warminster Road MoD site is one of extreme sensitivity. It is seen from the whole of eastern Bath and gives views over the same area.

At a time when housing and the lack of housing is a national problem, the site should be predominantly housing (including low cost). Consideration should be given to creating housing that allows opportunities for people to work at home. Discouragement of car ownership can only be effective: so far. If too enthusiastically enforced non-car ownership may create a self selected community tending to isolation. For example more elderly, families with small children and disable people cannot be expected to ride bikes or walk into town.

Schedule of comments: Consultees's suggestions and concerns

Any development must be in keeping. This does not necessarily mean neo-Georgian, but it does mean careful consideration of scale, massing and choice of materials. Wise control of ultimate intended purpose will determine some of these aspects.

What should be avoided is the formulaic approach that was taken on the Western Riverside development which is now proving to be visually monotonous....and redolent of the architecturally failed 1960s development at Snow Hill.

On the Warminster Road, buildings should ideally be of two stories, whilst the connect with the Avon and the canal should be stressed as an asset, rather than ignored. In keeping with the developing B&NES policy towards river usage, any development on the MoD site should enhance the River connection rather than ignore it.

In this context, and in the context of discouraging unnecessary car use, consideration should be given to the possibility of a Section 106, to provide a bridge over the Avon and the canal to connect the Warminster Road community with the retail area on the London Road.

Serious consideration should also be given to the improvement of public transport, perhaps as part of an overall transport review for the eastern side of Bath, where bus provision is generally poor, particularly after 6 pm.

Representation ID Number: 2979 /

The Warminster Road is already a very busy road, frequented by heavy goods vehicles. The speed limit is not adhered to. From my point of view it would be very important to undertake measures to calm the traffic coming in and out of Bath in this area.

I also understand that proposals for office or retail development would be considered along the Warminster Road. I would object to this on the basis that this is currently residential only and any additional office or retail development would detract significantly from the character of this road. Also, in relation to the above point, the addition of office or retail space would put additional pressure on this already busy road.

Representation ID Number: 2980 /

I think of all the sites in Bath that the Warminster Rd MOD one does not need bold and innovative designs. It needs to blend in with the existing housing on the north side of Warminster Road with natural stone and roofing.

This is a very visible site particularly from the opposite side of the valley at the slopes of Camden and Fairfield Park and the London Road.

So please no Snow Hill tower block or green roofs ! And please leave the existing fields and trees etc alone, too.

Representation ID Number: 3073 / 1

Could desperately needed playing field space for Bathwick St. Mary's Primary School be incorporated into the site?

We feel that it is very important that any access to the site from Darlington Rad is for walkers and cyclists only. With recent development and the school traffic, the road is already very busy at times. Any increase in car traffic would make it unsafe for pedestrians.

Representation ID Number: 3075 / 1

I am concerned for the stress caused when people live in tiny homes without adequate space.

Gone are the days when cars are not needed. Families no longer live in one area and nor do they work necessarily near where they live so cars have become almost a necessity if people are not to become isolated.