

APPENDIX 1: KEY ISSUES FOLLOWING PUBLIC CONSULTATION ON DRAFT MOD CONCEPT STATEMENTS

Consultation Process

The Draft MoD Concept Statements were approved for public consultation by Cabinet on 11th April 2012.

The Council then undertook a six week consultation period on the documents starting on 18th April and ending on 30th May. The purpose of the consultation was integral to the drafting of the documents; informing the local community and other stakeholders of what is happening to the sites, and to gather important feedback on the issues raised in the documents.

Key activities included:

- Consultation events in the locality of each site:

MoD Foxhill

- St Andrews Community Church Hall, Hawthorn Grove on Friday pm 27th April 2012, and Saturday am 28th April 2012.
- Combe Down Rugby Club on Wednesday pm 23rd May

MoD Ensleigh

- Kingswood School Sports Pavilion, Lansdown Road on Friday pm 11th May 2012, and Saturday am 12th.

MoD Warminster Road

- Bathwick St Mary CofE Primary School, Darlington Road, Bath Thursday pm 17th May 2012, and Saturday am 19th May 2012.

All MoD Sites

- Bath City Conference 2nd May 2012
- One Stop Shop, Manvers Street. Exhibition - 24th May until 30th May.
- Website, with links to all the Concept Statements and supporting Evidence Base, and the Comments Forms.
- Press releases throughout the six week consultation period.
- Media coverage, including local TV news.
- Leaflet drop to households in the immediate vicinity of the sites.
- Posters distributed in local areas
- Twitter campaign promoting events

The key issues emerging from the consultation events, together with the Council's proposed response and the recommended changes, are included below. The schedule of all the comments received, together with a statistical analysis of responses, is to be prepared and made available on the Council's website for public viewing.

Consultation responses

It is estimated that approximately 500 people attended the events and 372 comments forms were completed. These were supplemented by other comments and emails, including:

- A survey completed by 20% of the households within the Foxhill North area.
- A 200 signature petition received from Combe Down Primary School
- A petition of the Parish of Charlcombe with nearly fifty signatures concerning fears that the redevelopment of the Ensleigh site 'will detract from the beauty of the predominately rural and historic approach to the World Heritage Site ... and detract from the amenity of the open rural horizon...'

A wide range of issues were covered reflecting a variety of opinions, the complexity of the sites and their context, and the scale of development to be considered. However many of these comments reflected common issues, and these comments are grouped under the key headings identified below. All comments will however be analysed and if considered appropriate will inform the amendments to the final Concept Statements when these are reported back to Cabinet in September.

Additionally, some comments relate to strategic issues, such as the principle as to whether these sites should go to residential use from employment, or indeed whether the sites should be built on at all. However, the Council has already agreed through the Core Strategy that these sites should be residential led with employment provision focussed within the Bath Enterprise Area along the river valley. It is within this context that the Concept Statements have been produced, seeking to deliver residential led development that contributes positively to the quality of its neighbourhood and context.

Foxhill

Summary

Generally strong support for the ‘integration’ approach of the Concept Statement, reinforcing the importance of community facilities, open space, ecology, and supporting for additional retail.

The concern that was most commonly expressed was about the new primary school, the needs of and linkages with Combe Down Primary School and the critical opportunity that the redevelopment of the MoD site represents. Other common concerns related to the impact of vehicular traffic on already congested roads, the impact of development on views, concerns about security and overlooking from residents with property adjoining the sites

No.	Key Issues	Action / Response	Suggested change
1	<p>Primary School. Range of issues identified through public consultation, including the following:</p> <ul style="list-style-type: none"> • New single form entry school on MoD site. • New Junior School on MoD site, with Combe Down Primary School to be converted to infant, to create a split school site. • New three form entry school on the MoD Foxhill site. Convert Combe Down Primary School to residential. 	<p>Assessment underway, and to be reported to September Cabinet meeting.</p>	<p>To be recommended to September Cabinet meeting.</p>
2.	<p>Safeguarding s106 and/or CiL funding for local areas. Publication of ‘Foxhill at the Crossroads’ – seeing Foxhill North and MoD site as one large regeneration area.</p>	<p>S106 can only be used to address new needs, not existing needs. CiL funding will be distributed according to a Reg.123 statement to be agreed by the Council, however it should be noted that ‘a meaningful proportion’ is intended to be retained by a locality. This level will need to be defined.</p>	<p>The Concept Statements already encompass many of the aspirations of this ‘Foxhill at the Crossroads’ publication. No further changes proposed to the documents, but on-going discussions with Somer as major RSL covering Foxhill on potential improvements that could be made.</p>
3.	<p>Pitches for Gypsies and Travellers should be considered.</p>	<p>The role of the MoD sites in the spatial strategy for Bath was agreed in the Core Strategy by Full Council. Their function is to meet the District’s significant general housing need. Focussing housing on these sites, along with associated supporting</p>	<p>No change</p>

		uses, minimises the need for the Council to remove land from the Green Belt on the edge of Bath or Bristol within B&NES to meet housing needs	
4.	Treatment of northern boundary, and relationship with property owners of treed hillside.	Agree with concerns raised.	Amend Concept Statements to highlight security and overlooking concerns of adjacent owners. Detail to be agreed at scheme development stage.
5.	Provision of retail facilities within the site	Agree to suggestions.	Add reference to small scale retail facilities to be provided that do not impact on the vitality and viability of existing centres (Combe Down and Bradford Road shops).
6.	Sustainable construction and retrofitting – we should be much bolder in our requirements.	Agree.	Increase standards required to be met by development delivered pre 2016, by specifying that 20% of all homes to be CSH level 5 in full or zero carbon housing’.
7.	Increase numbers of self build housing	There is no guidance provided in the NPPF that enables the Council to specify a particular proportion of self build housing to be delivered, therefore we can only ‘seek to’ or ‘encourage’ the development of self build housing.	Continue to encourage the development of self build housing.
8.	Housing for the elderly / specialist care residential.	Proposals coming forward for this type of housing will be determined on their merits through the planning applications process	No change
9	Connections through to adjoining areas.	Already enabled by the Concept Statements. Should be covered at the masterplanning stage, enabling opportunities to be pursued (more difficult with vehicular access, but pedestrian and cycling access a must). On-going discussions with Somer Housing to discuss potential opportunities affecting their land ownership.	No change
10.	Seek to ensure community use of school playing field	Potential shared management responsibilities with appropriate constituted bodies.	Change wording of Concept Statements to specify the requirement to have shared management arrangements of school playing fields with appropriately constituted bodies.
11.	Provision of community meeting space	Opportunity for shared facility between appropriate	Add reference in the Concept Statements to require the

		constituted bodies.	provision of an appropriate Community space with associated facilities, and potential shared management arrangements with constituted body such as new school, Combe Down Rugby Club, or other organisation. This would be subject to legal agreement that allows community use of premises.
12.	New Health Centre	Being progressed by the Primary Care Trust, ensuring preparation work and business case development to enable this to happen	No change
13.	Traffic impacts	No action required as issues have been highlighted as part of the evidence base. Developers will need to respond to this.	No change

Ensleigh

Summary

General support for residential led development of the MoD site, but major concerns about a number of important issues:

- The potential for significant adverse impact if development on the adjacent playing fields proceeds.
- The deliverability of the quantity of development proposed. It has been expressed by a significant proportion of the respondents that the site does not have the capacity to absorb the housing numbers that are aspired to, without adverse impact on landscape issues in particular. It is suggested that the Concept Statement should provide a greater balance between housing numbers and the need to achieve high quality design that responds to context.
- The impacts on approach to the city, AONB, and the skyline (in particular to the south of Granville Road).

Key issues identified were as follows:

No.	Key Issues	Action / Response	Suggested change
1.	Expansion onto playing fields owned by Royal High School and Kingswood School, and currently outside the Green Belt and the AONB.	<p>It is suggested that the resolution of this issue is best resolved by undertaking massing and volume studies for this area to properly test and review against landscape and visual impacts.</p> <p>This should be undertaken in partnership with landowners and stakeholders.</p> <p>This investigation will be undertaken as part of the emerging Placemaking Plan.</p>	No change to document, but requires proactive approach on behalf of the Council to test and explore opportunities.
2.	The deliverability of the quantity of development proposed is questioned, particularly with regard to the impacts on approach to the city, AONB, and the skyline (in particular to the south of Granville Road).	Housing capacity has been assessed and it is considered that these numbers are reasonably deliverable. However it is acknowledged that this is a very sensitive site and that more flexibility on housing numbers is required to be expressed in the Concept Statement to enable development to properly respond to the context of the site, and to deliver appropriate numbers of new homes.	Amend Concept Statements to reinforce the need to balance housing delivery with the need to respond to other issues of acknowledged importance.
3.	School provision	A single form entry school is required on site.	No change (enough flexibility already provided)
4.	Pitches for Gypsies and Travellers should be considered.	The role of the MoD sites in the spatial strategy for Bath was agreed in the Core Strategy by Full Council. Their function is to meet the	No change

		District's significant general housing need. Focussing housing on these sites, along with associated supporting uses, minimises the need for the Council to remove land from the Green Belt on the edge of Bath or Bristol within B&NES to meet housing needs	
5.	Retail provision should be made	Agree	Add requirement to provide local retail space up to certain threshold. (NB deliverability will be subject to viability)
6.	Sustainable construction and retrofitting – the Concept Statements should be much bolder in their requirements.	Agree	Increase standards required to be met by development delivered pre 2016, by specifying that 20% of all homes to be CSH level 5 in full or zero carbon housing.
7.	Increase numbers of self build housing	There is no guidance provided in the NPPF that enables the Council to specify a particular proportion of self build housing to be delivered, therefore we can only 'seek to' or 'encourage' the development of self build housing.	Continue to encourage the development of self build housing
8.	Housing for the elderly / specialist care residential.	Proposals coming forward for this type of housing will be determined on their merits through the planning applications process	No change

Warminster Road

Summary

General support for the redevelopment of the MoD site for residential purposes, however the majority of comments refer to the need to address the current playing field deficiency of the school, or to seek the opportunity to deliver a new and expanded school on the MoD site to address wider educational needs.

No.	Issues	Action	Suggested change
1.	Primary School. Range of issues identified through public consultation, including the following:	Council's position to be clarified and reported back to September Cabinet meeting.	To be recommended to September Cabinet meeting.
	<ul style="list-style-type: none"> Take developer contribution for the 40 places generated. 		
	<ul style="list-style-type: none"> Provision of playing field on MoD site 		
	<ul style="list-style-type: none"> Double capacity of the school by developing new facilities on the MoD site and creating a split school site. 		
	<ul style="list-style-type: none"> Double capacity of the school with provision of a new school on the MoD site, and redevelop existing site for residential. 		
2.	Protect the natural open areas surrounding the current built up areas of the site	Already largely protected through existing policy and the evidence base. However there could be some changes to the current arbitrary boundary that wouldn't cause harm, and there is potential for development on the frontage with Warminster Road. This needs to be tested.	Amend to reinforce the importance of these open natural areas to the character of the area, but otherwise no change.
3.	Provision of shop within the site	Agree	Add reference to small scale retail facilities to be provided.
4.	Pitches for Gypsies and Travellers should be considered.	The role of the MoD sites in the spatial strategy for Bath was agreed in the Core Strategy by Full Council. Their function is to meet the District's significant general housing need. Focussing housing on these sites, along with associated supporting uses, minimises the need for the Council to remove land from the Green Belt on the edge of Bath or Bristol within B&NES to meet housing	No change

		needs	
5.	Building heights should be specified	Building heights need to be established through testing different design scenarios that respond to the issues of acknowledged importance based on the evidence (eg landscape and visual issues assessment) which informed the Concept Statements.	No change – controlled by existing policy framework and context.
6.	Use of Materials	Amendments required to reflect the visual sensitivity of the site.	Strengthen reference to Bath stone to reflect wider visibility of the site.
7.	Sustainable construction and retrofitting – the Concept Statements should be much bolder in their requirements.	Reviewing potential changes that can be made.	Increase standards required to be met by development delivered pre 2016, by specifying that 20% of all homes to be CSH level 5 in full or zero carbon housing.
8.	Increase numbers of self build housing	There is no guidance provided in the NPPF that enables the Council to specify a particular proportion of self build housing to be delivered, therefore we can only 'seek to' or 'encourage' the development of self build housing.	Continue to encourage the development of self build housing
9.	Housing for the elderly / specialist care residential.	Proposals coming forward for this type of housing will be determined on their merits through the planning applications process	No change