

Cabinet 11th July 2012

Statement – Caroline Kay BATH PRESERVATION TRUST

I speak as a Trustee of the Bath Preservation Trust.

The Trust supports the principle of housing-led development on the three brownfield sites to be vacated by the MOD with some caveats. We made a number of specific consultation responses on all the sites, which we hope will be taken into account. In particular we would like to see mention of the potential for some student housing in the mix on Foxhill.

But I now want to focus the rest of my time on Ensleigh.

Developing the brownfield MOD land is line with your published Core Strategy, with the NPPF, and with the need to deliver Bath's housing requirement.

The Trust was shocked – appalled – to see the Council's concept statement on Ensleigh making assumptions about potential additional use of green fields adjacent to the site – specifically the Kingswood and Royal High playing fields - in order to deliver the housing and other amenities sought there. We do not believe there is a mandate from the Core Strategy to open this wider green field area up for housing. As well as the principle of avoiding building on green-field land, those playing fields would need to be replaced, at least to some degree eroding the openness of the Green Belt and rural quality of the AONB, as well as quite possibly encroaching on the setting of the historic battlefield site.

So my first point is that the Council should not be opening these school playing fields up for consideration. It is a can of worms, not supported by your own strategy and policy framework.

Our second concern is that the Ensleigh concept statement is at best ambiguous and at worst misleading as to what can be fitted there. The very good supporting Landscape Report outlines the location's many constraints due to its setting, which is integral to the World Heritage Site and on the 'rim' of the bowl of hills, on the City's skyline adjacent to Beckford's Tower. The Concept Statement acknowledges that the locality is "exposed and prominent". However, this and the clear recommendations derived from the evidence in the landscape report are simply not reflected in what the Statement envisages.

Given these constraints it is our view that the numbers of dwellings etc to be squeezed on to the Ensleigh site are seriously overstated. To test this view, the Bath Preservation Trust, with help from Bath University is undertaking a rapid massing study for the site, and will provide the outcomes of that evidence gathering as soon as possible. While we are aware that B&NES plans more detailed massing work as part of the Placemaking Plan, crucially we doubt that it will be ready in time to inform

the Concept Statements and thus to inform the marketing and correct sale price of the land.

The Trust asks Cabinet to give very serious consideration to changing the Concept statement on Ensleigh as follows:

- To remove the suggestion that developers should be actively looking to develop the Royal High School and Kingswood School playing fields, instead making clear that the Council's policy is for brownfield development only and that any development plans should address the brownfield site alone;
- To strengthen, and make more specific reference to, the landscape constraints which will need to be respected in order to adhere to the Council's own development policies; and
- To interrogate much more accurately the number of dwellings and other development that can be fitted onto the brownfield site given these constraints and to alter the Concept Statement accordingly before the MOD markets the site in September.