

BATHNES CORE STRATEGY - B&NES COUNCIL SPECIAL MEETING, 4 MARCH 2013

STATEMENT BY BATH PRESERVATION TRUST

My name is Caroline Kay and I am the Chief Executive of Bath Preservation Trust.

We have read the Council's proposals on the Core Strategy in as much detail as is possible in the time available. We appreciate that your officers have faced a major challenge in meeting the Inspector's objections to the first submitted Core Strategy, and do not underestimate the difficulty of meeting his points. We also recognise that there is a housing need in the area, and the Council is obliged to attempt to meet it.

Bath Preservation Trust has a twofold charitable remit; for the built environment of the City of Bath, but also for the green countryside around it. So the Trust has always seen the two as integrated and interdependent, even before the inscription of the City as a World Heritage Site drew attention to the significance of the green landscape setting. It is because of this that we continue to express grave concern about the proposals before you.

The paper proposes new sites across B&NES which, together, meet the housing requirement by 100%. It does not seem to respond to the Inspector's clear steer that it is possible to fail to meet the housing need if there are sufficient constraints to outweigh the benefits (NPPF Para 14). Undoubtedly, the Inspector would set a high threshold for this, but let us look briefly at the 3 greenfield sites around Bath which are definitely proposed to be brought forward. Two are in the Green Belt. Two are within the Cotswold AONB. Two are significant bat corridors. One manages to be in the Green Belt, the AONB, the World Heritage Site and the Conservation Area - and to have flooding problems and a bat corridor. One is a school playing field, in a sensitive part of the Lansdown plateau where development will be restricted in terms of height and therefore in terms of dwelling numbers.

These may be perceived by the Council as the 'least-worst' development sites in Bath, but the statutory designations are here for a purpose. Indeed, elsewhere in the Core Strategy, it is argued that it is these designations which protect the boundaries of the City of Bath World Heritage Site and act as a buffer to ensure the City stays contained. Other amendments to the Core Strategy emphasise the weight to be given to the conservation of landscape and scenic beauty and the setting of the World Heritage Site (eg SPC 34). We would also hope that the Core Strategy emphasis on 'brownfield first' will be retained in line with NPPF para 111.

We will be responding more fully to the consultation, but we would like to have seen the environmental *benefits* of constraining housing development on the outskirts of Bath more clearly expressed. We would have liked some indication that the Council might have been prepared to contemplate not fully meeting their housing requirement, due to these constraints, under NPPF paragraph 14. After all, if we do not respect AONB, Green Belt and conservation designations for the UK's only whole-city World Heritage Site, is any green location safe?

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