



# BATH PRESERVATION TRUST

## **Statement to Cabinet/Council 10 July 2014**

Good afternoon, I am Caroline Kay, Chief Executive, Bath Preservation Trust.

First of all I should like to say that Bath Preservation Trust has consistently opposed the removal from Bath's Green Belt of the two areas proposed by the Council, through all stages of the Core Strategy process.

We therefore regret the Inspector's finding that development may proceed at Odd Down/South Stoke, and we welcome the fact that he rejects it at Weston. We also welcome his rejection of the Duchy's proposals for an urban extension at Newton St Loe and for any extension of the MOD Ensleigh development into the Kingswood School playing fields, although neither of these were being promoted by the Council. We are awaiting a reply to a letter to Eric Pickles, Secretary of State for Communities, to see if he agrees with his Inspector about Odd Down.

In both the Green belt areas there are some very important messages for the future on which the Council must act.

On Weston:

Here, the Inspector says in paragraph 173 '*The Council's assessment in relation to the World Heritage Site and the AONB underestimates the impact (that is harmful impact) in some of the locations.* I suggest that the Council should look at its assessment methodology in particular in relation to the green hillsides and views of the WHS when considering any form of development affecting them.

In paragraph 180, the inspector says '*Surprisingly, there is no conservation area appraisal to set out what makes the conservation area special.*' I think the Inspector is indulging in ironic understatement here. It is shameful that the Bath Conservation Area has no up to date, compliant conservation area appraisal to assist in the management of development in this internationally designated city. This has been put in the 'too difficult' tray for years, with lack of resources given as the reason, but those resources are being applied to deliver such appraisals in other parts of B&NES and the WHS has been ignored.

On South Stoke:

This is more complicated. The inspector's ruling is by no means a developer's charter for that area of land. He has agreed that such development will cause harm to the natural and heritage assets; it is his assessment of the degree of harm alone that allows him to reach the conclusion that development can go ahead, as long as appropriately mitigated. He agrees that 40% affordable housing must be delivered; he has ruled out development in the field immediately to the south of the Wansdyke and adjoining South Stoke Lane; he has agreed that any development must be



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pulled back from the edge of the plateau and screened; he has made clear that building heights will need to be managed very carefully; he rejects the idea of a vehicular access point leading off the Cross Keys or South Stoke Lane, and concludes there is no scope for including any safeguarded land (that is, land earmarked for potential future development) in this location.

If the Cabinet now, and the Council this evening, adopt this Core Strategy, I should like to make clear that Bath Preservation Trust will watch very closely to see that the detail outlined in the Inspector's report is fully met by any development proposals brought forward. I assume that they will ensure a significantly higher quality of delivery than the development at Sulis Meadows which originally left this area so substantially compromised.

There is a strong case for having an adopted Core Strategy, and indeed new housing where it is needed. But not at any price. We do not believe that the Council worked hard enough to find city centre sites – themselves much more sustainable – for the affordable housing it needs.

Instead you are choosing to build houses in the green belt. You must be sure, in turn, to achieve the mitigation and protection that our historic environment deserves and the Inspector's report demands.