**22/01370/FUL**

**Parcel 4234, Combe Hay Lane, Combe Hay, Bath, Bath And North East Somerset,**

Creation of new allotments including associated facilities and landscaping, including access and cycle parking, and access to adjacent soakaway.

*Objection*

Derrymans Field is an agricultural site located within the Green Belt, the Cotswolds AONB, and the indicative landscape setting of the World Heritage Site. This site, whilst within the Green Belt, is located adjacent to the land allocated for the Sulis Down development which was subsequently removed from the Green Belt (see allocation Policy B3a). Cumulatively, this land forms part of the general landscape setting of the South Stoke village conservation area to the south-east; the South Stoke Conservation Area Character Appraisal notes that “despite its close proximity to the suburban fringes of Bath, the village feels entirely rural and distant from the city.” It retains a connection with the village via a series of public rights of way and permissive paths that run along its south and east boundary. The southern slope further forms part of extensive and dramatic landscape views out towards Combe Hay, Twinhoe, and across the Cam Brook Valley. Derrymans Field, whilst somewhat set back from significant views, remains a strong contributor to the predominantly rural, agricultural character and appearance of the area and marks an important transition point between the busy junction of Wellsway and Old Fosse Road and the Odd Down Park & Ride, with the undeveloped fields and narrow lanes of Bath’s open countryside setting.

As part of permitted application 17/02588/EFUL for the delivery of 171 homes as part of Phase 1 of the Sulis Down development, a S106 agreement secured the provision of at least 1180m2 of allotments.

This application forms the latest addition to the fragmented, piecemeal development approach to the Sulis Down plateau.

We note the continued inclusion of Derrymans Field within the defined parameter boundary of Phase 1 of the Sulis Down development. However, Derrymans is NOT included within the site allocation boundary within Policy B3A and remains within the Green Belt. Any complementary use of Derrymans must be considered in relation to its particular landscape designation and associated additional protections. Proposals for the use of this land as allotments should be subject to LVIA and landscape impact mitigation, to support the assessment of harm to the character and openness of the Green Belt and the special qualities of the AONB.

This latest proposal should be considered in relation to existing structures on the site, such as a recently completed bat barn delivered in conjunction with application 17/02588/EFUL, and therefore as part of a programme of the cumulative build-up of Derrymans Field outside of the defined site allocation boundary.

BPT has previously maintained concerns over the use of the Derrymans site to provide associated amenity spaces such as allotments, which should be accommodated WITHIN the allocated development site. We reiterate our opposition to the increased encroachment on and build-up of the Green Belt and AONB, with resulting impact on its openness and an associated detrimental shift in character, in order to release space for more housing on the development site.

Policy B3a states that the site is allocated to provide “around 300 dwellings”; however, “The figure of 300 dwellings is not a cap on development if all the placemaking principles can be met”, including requirements that “avoid or minimise detrimental impacts” to the setting of multiple protected landscapes, including the Cotswolds AONB and the setting of the World Heritage Site and the South Stoke conservation area. A further requirement as part of the development is the “provision of Green infrastructure including multifunctional green space (formal, natural and allotments); well integrated Sustainable Urban Drainage Systems and habitat, pedestrian and cycle connectivity within the site and to the surrounding area.”

Furthermore, the Core Strategy and Placemaking Plan goes on to highlight that “at Odd Down environmental sensitivity and the need to minimise harm means that there is no scope to identify safeguarded land for the longer term.” This highlights the need for the continued protection of land (including Derrymans Field) immediately adjacent to the development site from further “residential development and associated infrastructure”, as part of Bath’s sensitive landscape setting.

Despite this, the Planning Statement does not suitably account for the site’s character as part of Bath’s distinct transition into rural countryside as well as part of the landscape buffer between Bath and its surrounding rural settlements, such as South Stoke.

We therefore consider that this dependence on Derrymans Field to deliver allotment obligations is therefore indicative of the OVERDEVELOPMENT of the Sulis Down site. The allotments, in conjunction with the provision of tool sheds, outdoor seating, and on-site parking would result in the cumulative build up and domestication of the site in views along Combe Hay Lane, at odds with the open, agrarian grain of Bath’s Green Belt setting.

We maintain that this harm to the Green Belt could have been suitably mitigated by being accommodated within the development boundary. The current consultation on Phases 3 & 4 of development, proposing up to an additional 300 homes, indicates that the provision of on-site allotments would not impede the delivery of a policy-compliant number of homes on the development site. As such, we conclude that NO special circumstances have been demonstrated for the proposed location of the allotments.

The D&A Statement adds that “as a fallback position, if permission is not granted as part of this application, the legal agreements include provision for the obligation for allotments to be met via financial contribution, rather than physical provision.” We do not consider that this is appropriate, given that the wording of Policy B3a. We are further concerned that this approach is being taken to make this site seem the only feasible ‘on-site’ alternative, rather than considering that allotment provision should have been suitably integrated within the site’s allocated development boundary. As such, this continues to exacerbate this development’s growing pressure on surrounding Green Belt land to meet residential requirements, with subsequent impact on the appearance and character of the Green Belt.

We maintain strong concerns with the proposed indication for the provision of future allotment expansion across the field site, which would result in a total development of 3532.5m2, which does not include the additional ground area taken up by the proposed orchard, seating facilities, and on-site parking. We maintain this would be of further detriment to the openness of the Green Belt as viewed from Combe Hay Lane; any further requirement for the provision of outdoor facilities and amenity space should be fully integrated into future phases of development. We consider further planned encroachment onto Green Belt land to maximise housing numbers to be inappropriate and would not demonstrate any special circumstances.

We therefore maintain objections to the encroachment of development outside of the site allocation as defined in the Local Plan, and resulting harm to the openness of the Green Belt, contrary to Section 13 of the NPPF and Policies B1, CP6, CP8, GB1, NE2, NE2a, and HE1 of the Core Strategy and Placemaking Plan. We emphasise that landscape and amenity requirements should be delivered within the parameter of the development site.