



Transition Bath are objecting to the revised planning application [14/01843/EFUL](#) for the proposed redevelopment of the ex-MOD site at Ensleigh North. None of the revisions alter our view that this application places the maximisation of development profit above the long-term environmental, social and economic requirements of the City of Bath. The proposal is inadequate and Transition Bath recommends that B&NES council reject the application.

In the summary table below we compare this application with the housing proposals for Warminster Road and Foxhill. On almost all criteria application 14/01843/EFUL under-delivers compared with the aforementioned sites and the B&NES council's 'Concept Statement':

Description	Ensleigh North	Warminster Road	Foxhill ¹
Developer	Linden/Bloor	Square Bay	Curo
All criteria versus Core Strategy or MOD Concept Statement requirements e.g. 11/35 means the developer is applying to deliver 11 out of the requirement of 35			
% Affordable Homes	11 ² /35	35/35	30+/30
Total number of homes proposed against req't	280 ³ /350	189/140	700/700
Housing Energy Standards	Minimum Building Regs	Code for Sustainable Homes 4 and 5 ⁴ , MVHR, wood burners	Code for Sustainable Homes 4 or SAP 'A'
School	Financial contribution, no land.	Contribute land and finance towards primary school	Build and supply land for single form entry Primary School
Allotments	0.093 ⁵ /0.24 Ha	0/0.11 Ha	0.56+/0.56 Ha
Formal Open Space	1.2Ha /1.1Ha	1.38/0.53 Ha formal open space	Yes, extensive (2.8Ha+)
Natural Areas	None/1.2 Ha 'offsite contribution'	? see above – over provision of formal open space	Yes, extensive (2.8Ha+)
Employment	37/167 jobs, 306 ^{SQM} shop, 60 bed extra care facility; the proposal claims any further provision to be 'unlawful'. But requirement is 2000m ²	None/200sqm	Community hub, extra shops, requirement for locals to be trained and employed during building process, retirement/care facility

- **Housing Energy Standard:** the proposals are set at the lowest standards available under current building regulations. This will prove costly and short sighted in terms of Bath's future energy needs. We believe that Code for Sustainable Homes level 4 or 5 should be delivered and that home owners should be given the option to install roof integrated Solar PV at some future date. This is being suggested for Warminster Road;
- **Green space & Allotments:** allotments are an obvious solution for residents to grow their own food and a strong enabler of community health and solidarity. These proposals must deliver green space and allotments on the site; an 'Offsite Contribution' is unacceptable. A 'community growing space' is not a practical alternative to traditional allotments in an area with long waiting lists for allotments.

¹ Curo's planning application has yet to be submitted. These figures are based on statements made by Curo during community consultations

² The remaining 24% of affordable home provision is proposed through the provision of 72 places in the nursing home

³ Combined with the Skanska Ensleigh South development

⁴ Provision for home owners to increase solar PV capacity from CfSH4 to 5 before purchase

⁵ Being close to the road most of this would be unusable



- **Extra Care Facility:** Transition Bath are concerned that neither the developer nor the council have provided quantifiable evidence of a need for affordable extra care places in B&NES. Without evidence of a shortage and an imbalance of supply and demand we don't think this facility can currently be justified?
 - I. The [2011 census](#) seems to suggest 16,000 people over 75 in B&NES, the [2013 draft B&NES SHMA study](#) states a need for 25 extra care places per 1000 of population over 75 which implies an overall requirement of 400 for B&NES. Increasing this by 72 is going to have a large impact on the existing providers and may not be justifiable?
 - II. The council have argued that the "The Housing Learning and Improvement Network (LIN)" in 2008 documented a need, but as far as we can tell the document just states that the "population is aging" and provides no evidence of an imbalance between supply and demand?

We don't believe this development should go ahead without this justification. Ultimately we feel the developer has selected this option not out of the public good but in order to maximise profits.

The risk is that this is no need for such a facility, that this reduces the delivery of normal affordable homes for which there is a documented justifiable demand and therefore more market homes over and above the 13,000 in the Core Strategy will have to be built, most likely on green field land?

The outline application for the extra-care facility does not also specify tenure which runs the risk the developer will attempt to justify that these homes should not be socially rented at a later date?