

15/02465/RES - Former Ministry of Defence Foxhill Premises Bradford Road Combe Down

Approval of reserved matters with regard to outline application 14/04354/EOUT for the development of 276 dwellings, public open space and all associated infrastructure.

Comment, with OBJECTION to some elements: The Trust once again commends the project team for their consultative approach to the redevelopment of the site and the efforts which have been made to engage residents and stakeholders. The consultation process has been exemplary and we appreciate Curo's engagement with the Trust. As in the outline application, we broadly support the mixed housing concept and the mixed nature of the various building types and forms. We also commend the detailed review of local character and building forms which have informed the proposals.

However on close review within the limited time frame of the reserved matters application we have a number of significant concerns, in particular that there is a 'disconnect' between the outline strategic statements in the Design & Access Statements, and the detail contained within the application. We feel this has resulted in a lack of clarity in terms of the actual fine detail of the development which is worrying. For a development as significant as this, such matters should not be left to condition. Phrases along the lines of '[these are] *the types of house/materials/finish we are proposing*' are unclear and for the Trust this results in being unable to gain a proper understanding of the finished detail regarding materials and therefore the overall look and feel of the development. While a comprehensive review of local context was undertaken, the scheme now appears to draw on building typologies from other contexts altogether.

Without sufficient detail, Curo's stated vision to '*create a distinctive, contemporary development of high quality housing, community facilities and open spaces*' is undermined and unproven. In particular we are concerned that commercial and financial pressures regarding the use of materials are resulting in an unwillingness to commit to particular materials and this limits the belief in the overall vision.

Our concerns are specifically:

Materials

'The elevations of the homes are mainly of Bath stone or a similar reconstituted stone and two complementary shades of brick masonry. Certain elements of each building, whether an apartment block or an individual house will be emphasised in Bath stone. The mansard roofs of the apartment buildings will be covered in a metal standing seam roof. The low-pitched roofs of the town houses will be of terracotta tiles, one lighter and one darker shade to enrich the visual appearance.'(D & A Statement) This non-specific approach concerns the Trust, in that it is impossible to properly envisage this development when complete. Whilst artists' impressions and visualisations are useful, they can be misleading in terms of colour, hue and tone, and are essentially that, impressions. The final composition of the elevations and roofs of the various building types in terms of tonal value, materials and finish will be fundamental to the final character and design success of the development and these details are not apparent in the application.

As Bath Stone is the most important material for synergy with the local palette, we feel it is critical for there to be a firm commitment as to which elevations will be completed in

natural Bath stone, and this should be guaranteed by condition. Reconstituted Bath stone cannot be perceived as an interchangeable material as suggested by the D & A Statement.

We note in the elevation drawings that there are references to Material Options naming Brick 1 and Brick 2 etc, yet we have been unable to

- a) establish what these numbered bricks relate to in terms of brick type (from the 7 options detailed), and
- b) ascertain what Material Options (of the 1-12 for 2 bedroom houses for example) will be used for which dwelling in which area of the development. Can Curo provide any further specific information on the material options?

We are concerned in particular about the proposals to use flat terracotta clay tiles on some roofs, as they are not a feature of Bath and do not conform to the Bath palette. Reference has been made to the '*traditions of picturesque garden suburbs*' nationally as having informed the proposals and we would comment that Bath is a unique city within which only the local forms, materials and colour palettes should be considered.

The use of brick in Bath is always of concern to the Trust, especially in Combe Down which was the original source of Bath stone and which is largely characterised by the use of this material. However we understand that financial and logistical pressures may inform its use. If a material relatively unused in Bath is to be selected we would encourage the idea of identifying with the local planning authority and other interested stakeholders a specific brick identified for its suitability for the Bath context and with a design rationale for that suitability. We would strongly urge the developers to consult with us and other expert stakeholders on the final selection of bricks to be used and that for each type of house sample displays of materials are produced. Ideally this consultation should have happened before the planning stage, in order to have certainty about materials before finalising the reserved matters application.

There is the additional difficulty in reading the hard surfaces plans, resulting in limited appreciation of the over street scenes, traffic management and landscaping.

Garden Square and green space

We are disappointed by the envisaged Garden Square, in actual fact it is no more than 4 green squares dissected by the main arterial route through the site. We cannot see how this will be '*part of the community heart of Mulberry Park*' as traffic dangers and noise will constrain the enjoyment of this space. Whilst we appreciate the bulk of proposed green space for leisure pursuits are envisaged for later phases, we are disappointed that no provision has been made for any usable green space (bar private gardens) in this phase. This means that the '*ambition for Mulberry Park to be a green and pleasant place for residents, visitors and the existing local communities*' is actually, at this stage, an empty phrase.

In addition in the outline application the open green space or gateway gardens adjacent to the roundabout would belong to, and be maintained by, the two entrance apartment blocks but, on review of the application, this does not seem to be the case as there are now

two stone entrance panels in this location; this double function as both entrance and amenity space is again unclear and further detail would be helpful.

Traffic and roads

Of great concern to the Trust is the fact that the site has become more aggressively car - oriented since the proposals of the outline application. The Curo assertion that *'the streets are all designed to put pedestrians and cyclists first'* is simply not true based on the plans contained in the D & A. The road layout has been changed and it is not clear how traffic will negotiate the site safely. In particular all roads seem to be shown as through routes rather than the safer cul-de-sacs proposed in the outline application. The 'shared surface' areas are also limited. It appears that cars driving around and through the development will naturally dominate the roads and pedestrians and cyclists will become second best. The potentially busy main arterial route runs through the core of the site and the Garden Square very close to the community and school buildings.

Visibility

We appreciate that height parameters were set by the outline application and that assurances were given that the development would be screened from views from the City by existing off-site woodland augmented by on-site planting. As an advanced tree-planting plan is submitted with this /RES application, we would request the Council to satisfy itself now that the quantity and species proposed will ensure screening in the short, medium and long term, and that sensible tree-protection and management measures are written into any proposed provision.

Conclusion

The Trust continues to commend Curo on their overall strategic aims for this site, specifically to create a distinctive and contemporary high quality development. However in reality we cannot as yet envisage this ambition being realised due to the 'disconnects' we have detailed above. In particular we strongly urge Curo to provide further detail on the crucial elements of this development; the specific portfolio of materials and actual exterior finishes for each dwelling or set of dwellings. Until such detail is provided, the Trust is unable to make a proper and informed judgement on the proposals. The impression that the 'car is king' regarding the road layouts in the development is also unwelcome and is contrary to the stated aims of Curo to develop a pedestrian and cycle friendly site. We would therefore recommend DEFERRAL or REFUSAL until these elements have been better defined. We reserve the right to make a further submission should more detail be forthcoming before determination.