



## BECKFORD'S TOWER AND MUSEUM

Beckford Tower Trust

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### **14/01853/EFUL**

**Ministry Of Defence Ensleigh, Granville Road, Lansdown, Bath,  
Bloor Homes and Linden Homes**

**Full planning permission sought for the erection of 180 residential units (Use Class C3), a neighbourhood retail store of up to 306 sqm GIA (Use Class A1), associated highways works, infrastructure and public open space. Outline planning permission sought for a 60 bed Extra Care Facility (Use Class C3).**

### **Objection**

The Beckford Tower Trust is a registered charity whose sole Trustee is the Bath Preservation Trust. We are submitting an objection independent of the Bath Preservation Trust due to the impact the proposed planning application will have on the specific remits of the Beckford Tower Trust. While we support the provision of housing on brownfield sites The Beckford Tower Trust objects to the above application due to the following concerns;

**The lack of a full Heritage Impact Assessment** is surprising and we feel that the significance of Grade I listed Beckford's Tower and its setting, and the harm the proposed development will cause to it, has therefore not been adequately considered. The importance of consideration to the setting of Beckford's Tower is reinforced under paragraphs 132-134 of the NPPF where it is provided that substantial harm to the significance of a designated heritage asset can be caused by development within the setting of that asset, and that any harm should require clear and convincing justification. Substantial harm to heritage assets of the highest significance, notably grade I and II\* listed buildings, such as Beckford's Tower and Lansdown Cemetery Gateway, should be wholly exceptional. We would refer in particular to East Northamptonshire Council v. Secretary of State ex parte Barnwell Manor Wind Energy Ltd on the issue of damage to the setting of a heritage asset.

#### **Permanent negative impact on views of Beckford's Tower from the site.**

We regret that the layout of the site, the axis of roads and creation of vistas fails to take account of views of Beckford's Tower.

The Environmental Impact Assessment states that  
“*Positive relationships are maintained with adjoining historic buildings and spaces, including visual connections from within the Site which are made with the local landmark of Beckford’s Tower.*” (8.0 MITIGATION AND ASSESSMENT OF RESIDUAL LANDSCAPE IMPACTS, Historic buildings and spaces 8.1) This statement is also repeated in the Design & Access Statement page 28.

Unfortunately, we do not consider that this has been successfully achieved. There is no single clear view to the Tower from the site and here are very few views of the Tower at all. We question why the Tower has not been used as a focal point for a view/vista down a street or across the open space. The view of the Tower would be almost entirely blocked from the site by the bulk and height of the care home facility and the adjacent tall dwellings.

The Environmental Statement (item 4.3.25) and the Design & Access Statement (Page 14) both state that central green space is a “*focal point in the development from which glimpsed views of the top of Beckford’s Tower can be seen.*”. We feel that this merely glimpsed view of only the very top of the Tower is not good enough. The complete enclosure of the central open space by 3-storey buildings does not, offer any clear views of Beckford’s Tower. We believe that the layout of the site should offer at least some full views of the Tower and surrounding landscape, not just glimpses of the very top. In particular it would be good to see that the play area was provided with a clear view of the Tower.

#### **Permanent negative impact on Views from Beckford’s Tower**

The Environmental Impact Assessment states that the mitigation for the permanent negative impact the development will have on views from Beckford’s Tower and Lansdown Cemetery is the ‘*provision of open space between built forms*’. While the central open space and the street layout is no doubt an attempt to meet this, we feel that the continuous bulk of built form remains apparent due to the minimal amount of open space between plots and therefore does not adequately address or mitigate this issue. Linden homes section RR with plots 126-111 clearly shows that this open space between plots will be largely indecipherable when viewed from Beckford’s Tower due to the height of the proposed buildings on those plots (Linden types 13 and 14). Similarly, the minimal open space between built form that is apparent on sections RR is also an issue on Bloor homes section AA plots 85-102(Bloor type 5). The presence of garages set between the houses creates a continuous bulk of buildings that creates a barrier to any through views both to and from the central open space.

We would encourage that the unit types be more varied along street sections, so that differing building heights rather than replicated types, and a greater provision of space between plots, could create a more variegated roof-scape and better views through the site.

The view from Beckford's Tower to Ensleigh House will be entirely obstructed, as seen in NPA Verified View Montage no.9.

### **The Shop**

The view from Beckford's Tower will have direct sight of the proposed shop, as is apparent in Verified View Montage no.9, even after predicted tree growth over ten years. We strongly feel that it is highly inappropriate for a building of such commercial nature to be visible in views from the Tower or the Lansdown Cemetery Gateway. We also feel that the design and materials of the proposed shop are inappropriate and fail to reflect or enhance the local character of the area. We would strongly object to the provision of any illuminated signage relating to the shop.

### **Extra Care Unit**

Whilst this building is only indicative outline and will be subject to a later detailed planning application we feel that the details which have been presented within this application clearly show what we consider to be a serious obstruction to the views from Beckford's Tower. The unbroken bulk of the building will be a termination of the view rather than offering views through the site. Similarly, views to Beckford's Tower from the site will be severely obstructed. There appears to be some confusion in the various parts of the application around proposed storey heights for the various elements of this outline and these need clarification. We would encourage that the continuous bulk of this building be broken down into a variety of buildings.

### **Inaccuracy in stating Lansdown Cemetery is deconsecrated and failure to therefore assess the permanent negative impact on Lansdown Cemetery.**

In the Environmental Impact Assessment and Environmental Statement Lansdown Cemetery is referred to as deconsecrated. It is not. It is a closed cemetery but still consecrated. There has therefore been no assessment of it as a consecrated space, still regularly visited by bereaved relatives and descendants, and the significant increase in negative impact the proposed development will have in contrast to the relatively low negative impact the MOD occupation of the site has had on this quiet space for contemplation has not been considered at all.

In light of this oversight there has also been no attempt to evaluate the impact of having a shop opposite Lansdown Cemetery or the impact that the building heights overlooking the cemetery as seen in Verified View Montage no. 10 will have on this consecrated space.

### **Failure to acknowledge and assess Grade II\* listed Lansdown Cemetery Gateway as a heritage asset.**

The Lansdown Cemetery gateway (and flanking walls and railings), has not been identified as heritage asset - the gateway is listed grade II\* in its own right, is a separate heritage asset and it is therefore essential that the impact of the proposed development on the Gateway as a heritage asset is assessed.