*17/04829/ERES – Former Ministry Of Defence Foxhill Premises, Bradford Road, Combe Down*

**Approval of reserved matters in regards to outline application 14/04354/EOUT for the development of 96 dwellings; 500 sqm (gross internal floor space) of A1, A2, A3, A4 or A5, ancillary parking; landscaping and all associated infrastructure.**

Object: The Trust has reviewed the revisions to this application but we maintain our objection to this scheme on the basis of the detailed comments contained in our original submission. This should be read in conjunction with this objection. We do not see that any meaningful change has occurred that will mitigate against the harm that this scheme will cause to the Outstanding Universal Value of the WHS. The reduction in heights of the blocks A and F by 700mm will in our view make no improvement to the potential visibility of these blocks on the skyline, and similarly neither will the small changes made to roof form on blocks C and D.

We are still very concerned and of the strong opinion that these buildings will appear as a hard horizontal intervention on the wooded green ridge of the southern part of the city and will therefore cause harm to a key criterion of the city’s designation as a World Heritage Site (landscape setting). These buildings will create an incongruous flat urban edge to the city’s wooded ridge where currently there is no visible urban form. Whilst we understand that the buildings have been built to the parameter height of the outline application we feel that constructing flat roofed buildings to the exact height of the parameter height constitutes overdevelopment and shows a complete disregard for the need for articulated and variously expressed roof forms (including breaks) to reduce the monolithic bulk of these buildings, to reference local context (including Phases 1 and 3) and to provide visual relief in long views from one hard horizontal roofline.

We continue to be of the opinion that the building design is bland, bleak, lacks any contextual reference and is an example of ‘anywhere architecture’. The removal of red brick is welcomed but has a marginal impact on the visual appearance given the large expanses of bronze cladding which also have no contextual relevance.

We continue to be concerned and disappointed that the design quality and general approach to this phase is in direct contrast with the quality, spirit and character of the Phase 1 and Phase 3 schemes.

The proposed development, by virtue of its massing, height, design, materiality and failure to respond to context would compromise and harm the Outstanding Universal Value of the World Heritage Site. It is therefore contrary to Section 12 (Conserving and enhancing the historic environment) of the National Planning Policy Framework (NPPF), policies B1, B4 and CP6 of the B&NES Core Strategy and CP6, D.1, D.2, HE1, NE2 and most importantly policy B4 of the Placemaking Plan. We refer to Planning Practice Guidance – Conserving the Historic Environment Para 13 regarding the LPA obligation to consider the implications of cumulative change on the setting of heritage assets and PPG para 026 regarding the mitigation or modification of changes which will have a negative effect on the OUV of the WHS. We would therefore recommend that the application be refused.