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**18/03797/FUL - Chivers House Windsor Bridge Road Twerton**

*Demolition of existing building and redevelopment of the site to provide 95no. dwellings across two separate buildings. External works including hard and soft landscaping and site clearance works with land set aside for the future facilitation of a Sustainable Transport Route. Proposed vehicular access to Windsor Bridge Road and provision of 26no. vehicular parking spaces and cycle parking*

Object: Whilst the Trust recognises that the revisions to the scheme do go some way to reducing the impact of this scheme on the character of the conservation area and riverscape, we maintain our objection to this scheme on the basis of the harmful impact of the height and bulk of the buildings, and the fact that the proposed scheme does not include any affordable housing.

Height and scale

The west block of this scheme is still at least a storey too high and if agreed would be an overbearing and incongruous element within the local domestic scale townscape and the more informal green riverbank. The Trust objected to the height of the Roseberry Place scheme and now it is being constructed it is easy to see how the excessive bulk and height of these buildings, even not fully constructed, have blanked out views up and across the river valley, created an overbearing and dominating effect within the local townscape. This scheme only serves to exacerbate that harm and to compound it by introducing an even taller discordant building into the townscape. In addition the scheme competes with the landmark buildings at BWR, which as we have previously stated, were designed to be the only notable buildings of height within the BWR site (of which this is part).

The BWR Masterplan states that *‘any redevelopment must respect the relative proportions and enclosure ratios found within the city to fully reflect their context*. *Taller structures will need relatively more space to create the suitable balance’*. It is clear that these proposed monolithic buildings sit high and tight on this small site and present over-development resulting in inadequate place making, particularly in relation to the public realm which is limited. In particular, we see the use of the bridge in context drawings to be potentially misleading; it is clear in the small print the bridge is not part of this application and may never be opened up for STR access yet it appears nicely integrated in all the visuals and the description (and actually perfectly in alignment with the design breaks in the east elevation of the west building).

Use of buff brick

We are still very concerned with the proposed use of a light buff brick which appears to be increasingly proposed within the World Heritage Site and in particular on taller buildings where its visual impact will be emphasised.  In our view buff brick does not reinforce local character, distinctiveness or sense of place but instead it erodes it and is a poor quality substitute for Bath stone.

Lack of affordable housing

We find the complete lack of affordable housing within this scheme to be totally unacceptable and contrary to both local (CP9) and national policy. Bath Preservation Trust supports affordable housing in all significant city centre housing developments, in accordance with policy, as it adds to the vibrancy and year-round lived-in ambience of the city, and also because it relieves housing pressure including on the Green Belt.  We also strongly object to the fact that the viability report is to be withheld from public scrutiny and therefore the process of deciding this element of the application will not be transparent. Case law and political pressure nationally is increasing to suggest that ‘reasonable’ developer profit may be lower than developers deem ‘viable’ and therefore it is critical that these elements are in the public domain. Bath suffers from a severe lack of housing that is affordable for people working in service sectors and other lower paid employment, and developers benefit from the inflated market house prices compared with other cities. The LPA must not let this scheme become an example of how to override local planning policy as this would be seen as a precedent for future schemes.

The proposed scheme, by virtue of height, scale and bulk harms the setting and views of multiple designated heritage assets. This development would neither preserve nor enhance the character and appearance of the adjacent conservation area, and would fail to respect or enhance the distinctiveness of the local townscape. We believe that the special qualities of the World Heritage Site would be compromised by such development. The scheme fails to accord with policy CP9 on affordable housing. The scheme would be contrary to the Planning (Listed Building and Conservation Areas) Act 1990, Section 16 (Conserving and enhancing the historic environment) of the National Planning Policy Framework (NPPF), policies; B1, B4, B5 and CP6 of the B&NES Core Strategy and policies CP9, CP6, D1, D.2, D.4, D5, HE1, B4, BD1 of the Placemaking Plan.  It is also contrary to the provisions of the Bath Western Riverside SPD. **We therefore strongly recommend that the application be refused.**