**Former Ministry Of Defence Foxhill Premises Bradford Road Combe Down**

Outline Planning Permission for up to 700 dwellings, up to 500 sqm retail (Use Class A1, A2, A3, A4, A5) up to 1,000 sqm employment (Use Class B1), up to 3,500 sqm community/education (Use Class D1), single form entry primary school, open space and all associated infrastructure.

**OBJECT**

The Trust commends the project team for their approach to the redevelopment of the site and the efforts which have been made to engage residents and stakeholders. Design workshops and consultation events have been attended by representatives of the Bath Preservation Trust and meetings have taken place between BPT and the development team.

By far the most significant part of these plans is the provision of 700 new homes and their integration both with the existing Foxhill site and the rest of the city. We welcome the provision of a range of housing on the site and a mix of uses to sustain the community. We particularly welcome a provision for affordable homes and affordable family lifetime homes (with gardens) in this sustainable, well connected brown-field site within the city.

In principle we welcome the type of housing and character areas.

However, BPT regretfully objects to this outline planning application for the reasons stated below;

Building heights

We are very concerned about the visual impact of 6 storey buildings in long views of the Bath skyline, and in the localised townscape context.

The tallest buildings (5-6 story crescents around open space) are nearest to the northern boundary and the skyline. This is excessively tall for buildings in this location. The landscape analysis we have seen suggests that topography and distance from the edge of the site allows visibility of these buildings above the tree line from the north. The evident visible appearance of the buildings (including illumination) above the green skyline would have an adverse impact on the character and aesthetic value of the precious landscape setting to the City of Bath World Heritage Site.

From within the site we have yet to see any assessment to show that current distant views northward (e.g. to Beckford's Tower) from the higher parts within the site will remain? Or be blocked? Similarly, any edge reinforcement planting will need to be sensitive to long distance views out and in. These issues need to be resolved by means of verified views from within the site as soon as possible in order to refine the layout and massing.

We acknowledge that many residential terraces in Bath are in fact 6-storeys. However one storey, the basement, is below ground. We do not however consider that the 6-storey terraces in the upper town and central areas of Bath are an appropriate height or architectural reference for this area of the city which has a very different character. The ‘grand terrace’ approach is further confused by the reference to the use of materials harmonious with the Combe Down area –here the textures and finishes used in the construction of more humble buildings are very different in appearance.

Furthermore, Bath Building Heights Strategy (September 2010) refers to the appropriate height for Zone 5as2-storeywith

* ***‘One additional setback storey generally acceptable’;***
* ***‘One additional storey could be acceptable where it aids legibility, for example local centres, creates better enclosure or provides regeneration benefits and does not intrude into views onto the plateaux by exceeding the height of the tree cover.’***

We are particularly concerned about the scale of 6-storey buildings within the immediate context. Whist we appreciate that the site falls where these buildings are positioned, we remain concerned about the inter-relationship of the height and massing of the 6 storey buildings with the surrounding development which would be more domestic in scale. The height of the terrace, particularly at the back, would present an uncomfortable jump in scale from lower to higher storey height and risks having an over bearing impact on the surrounding development and public spaces.

Public Transport

We encourage all stakeholders in the Bradford Road area to develop a collective approach to linking public transport between Ralph Allen School, the St Martin’s Hospital, and Bath University.

Permeability

We are keen for the site to make better links to the Bath Sky Line Walk and we would encourage further dialogue with the National Trust.

Sustainability

We regret that there is no provision for self build or zero carbon development as is required promoted by the Concept Statement (after 2016).