

**Hartwells Garage site, Newbridge Road**

**Response to public consultation**

Thank for you the opportunity to give feedback on your current proposals for the development of this site. This response represents our informal views based on the information available and we reserve the right to respond formally to a planning application.

**Principle of development and proposed use**

The Trust is overall supportive of the principle of developing this site for *residential accommodation*. However we question the current proposal for a large amount of student accommodation teamed with a smaller amount of rented apartments. We cannot see how this mix of uses accords with the vision for the site as noted in the preamble to policy SB15, which talks of ‘*residential development, not including student accommodation’*. We have an in-principle objection to purpose built student accommodation (PBSA) on prime residential land. Indeed the Council’s own proposals for a new student accommodation policy within the Local Plan preclude any future building of PBSA’s within the city. We do not agree with the claim that PBSA’s relieve pressure on family homes given we have seen no decrease in the amount of applications for change of use to HMO’s over the recent past despite much PBSA accommodation coming forward. Should PBSA be proposed at planning stage, we would strongly recommend that they are designed to be adaptable to future residential use and wholly managed by one of the universities rather than a private company.

We also have concerns regarding the ability to properly police a ban on cars being brought and parked locally by students, which would have a negative impact on the local already constrained parking situation. In addition further information on the type of student accommodation proposed would be useful, especially as to their affordability for the normal undergraduate student. We have been informed that there is reducing take-up of PBSA accommodation by legitimate university students due to its high cost. We would very likely object to the PBSA element of this scheme should it come forward in the application.

We also question whether the proposed small 1 and 2 bed rental units that form the residential element of this scheme are the right mix for the local area. Given this area is characterised by a largely family type community, the provision of some family homes in the mix of uses (as well as apartments for young professionals, older couples and key workers), and some 30-40% affordable (as per the planning requirements placed on this land) would be more likely to satisfy local demand for housing given the proximity of schools, the RUH and a community service centre at Chelsea Road. Whilst we welcome the promise of ‘affordable homes for local community’ to ‘cater for a specific identified need’ we question what this actually means and assume this will become clear in a planning application. These units could easily become more student or holiday lets if residential take-up is low, and this would have a negative impact on the vitality of the local community. The lack of appropriate housing mix renders these proposals contrary to policy CP10. Given this we urge you to reconsider the proposed housing mix.

**Design, scale and local context**

We welcome the permeability through the site as shown on the consultation boards, and the landscaped courtyards. In addition the retention of the cycleway, and the sustainable transport route are also positive proposals.

There is however overdevelopment of the site with both the height and depth of the Newbridge Road terrace and the dense scale of the rear student blocks, especially with the stepped back flat roofs which exacerbate their monolithic appearance. These blocks should be more articulated in design to break down the sense of looming height and mass. The internal corridors appear long and bleak. Even with the topography of the slope, these blocks at 5 storeys will be much taller than any building found locally, and as such could have a negative impact on distinct local townscape character. The application should examine the local – largely non-designated- heritage context, and assess the impact of this scheme on this context and on the setting of the adjacent conservation area. In our view the proposals as they stand fail to maintain or enhance local character and distinctiveness.

Whilst the use of the contemporary terrace design is welcome, the Newbridge Road elevation is a storey too high and with the double mansard presents a building mass that is top heavy and incongruous to local character, as demonstrated by your illustrations of local housing types. It would dominate the street scene in what is a very uniformly domestic scale area of generally two storeys with loft. These buildings should be lowered by a storey, decreased or broken down in their depth and set back a little from the pavement to give a sense of space that is currently experienced along Newbridge Road. As it is they sit hard and tight to the edge of the pavement, though the idea of trees is welcomed.

We question how the scheme will interact with the cement plant and whether there would be any amenity impact issues arising from the nearby industrial use.

As the application stands at present we would likely object to the scheme on the basis that parts of the proposals are contrary to the provisions of the Town & Country Planning Act (Listed Buildings and Conservation Areas) 1990 (para 72), the NPPF chapters 12 (127) and 16, policies SB15, B1, CP6, CP10, D1, D2, D3, D5, HE1, BD1 of the Local Development Plan.