

**Twerton Park and Twerton High Street Pre-application Consultation**

**April 2019**

Thank you for your time presenting the proposed scheme to our architecture and planning committee. We re-emphasise our strong support for the redevelopment of this site in principle, which will retain Bath City Football club in its historic location and provide a mix of uses that will bring benefits to the Twerton community and the wider city. It also has the potential to deliver sustainable development that would regenerate and enhance the character and attractiveness of the local townscape.

We refer you to our earlier consultation response (attached) as much of our response remains applicable; however we have the following additional comments to make at this stage:

Our previous feedback raised concerns about the heights of the proposed PBSA buildings at 7 storeys. We recognise that an amount of PBSA is required for viability reasons however the height of at 6-7 storeys remains concerning given this is at least 3 storeys taller than the average building in Twerton.

We welcome the provision of affordable PBSA for 2nd and 3rd year students. However, we wonder how restrictions will be maintained? We accept the benefits of PBSA in this location as a way to help release HMO’s for local housing need, although this has not been the experience elsewhere in the city . and we are pleased to see cluster flats included in the layout.

We have not yet seen the elevation of the rear of the PBSA block facing the car park. We believe that this elevation, the ground floor use, and the car park has a part to play in creating a safe and attractive amenity for all users of this space. We would encourage the ground floor facing the car park to have an active frontage, that is well lit and accessible. On non-match days this elevation, and ground floor uses could complement a market on the car park.

We think that the corner treatment could reference the characteristics of many corners in Bath, and have some architectural interest that draws pedestrians around, rather than a sharp right angle and this needs more thought.

We would like to see greater evidence of how the proposal reinforces the local distinctiveness of Twerton as described in the sub-area Conservation Area Character Appraisal, in support of any application.

We recognise that raising the heights of buildings along the High Street would be a positive change, as currently the lower building here is lower than average, and this is welcome.

**In conclusion**

The site is located within the Bath City wide Conservation Area and World Heritage Site, and any planning application will be assessed within the context of national and local planning policies for the historic environment.

If well designed this development has potential to create a better place for people to live, work and play in the heart of Twerton. However we feel that more could be done to make the PBSA element of the scheme more attractive and enhance the overall quality of Twerton and reinforce its sense of place.

The proposed buildings at 6 and 7 storeys have the potential to harm Bath’s historic environment. In our view the degree of harm is , to use the language of the National Planning Policy Framework (NPPF), less than substantial. However, the NPPF is quite clear that less than substantial harm does not necessarily equate to an acceptable proposal. Paragraph 200 reads “When considering the impact of a proposed development on the significance of a designated heritage asset (conservation area and WHS), great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Bath World Heritage Site is a heritage asset of the very highest significance.

Therefore we would wish to see a very strong case spelt out for the public and community benefits, and any heritage and townscape benefits guaranteed by the scheme, in order to weigh against the harm caused by buildings at this height and bulk. A thorough visual impact assessment (LVIA) and heritage impact assessment should be made to balance against any harm (to the historic environment and views across the Conservation Area and WHS)

It’s worth bearing in mind that not all elements of the Conservation Area and WHS necessarily contribute to its significance. A heritage impact assessment would need to take into account the relative value of elements affected and their contribution to the significance of the Conservation Area or World Heritage Site as a whole.

We would be very happy to review further work and be involved in any further stakeholder consultations with the Local Planning Authority and Historic England and would welcome the opportunity to comment on development further in the development process.

The above comments represent our views at this stage following our meeting. We reserve the right to submit a response to the planning application when it comes forward.

**Bath Preservation Trust**