

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

**March 2019**

The presentation for consultation and ambition for the site is commendable. We recognise that this is a large and comprehensive redevelopment scheme which aims to enhance the Football Club’s sports facilities and associated community facilities, and would provide welcome high street improvements in this area of Twerton.

We fully support the redevelopment of this site in principle to provide a mix of uses. Redevelopment has a huge potential to regenerate and integrate the site with the local area and enhance the attractiveness of Twerton.

The site is located within the Twerton sub-area of the Bath City Wide Conservation Area, and within the Bath World Heritage Site. As development proposals progress we would expect to see the detailed historic environment assessments, heritage impact assessments, landscape and visual impact assessment and verified views assessments as required by local and national planning policy.

We would recommend that any further design solutions presented are supported by justification and understanding of the context, a thorough site analysis and character appraisal of the heritage context.

**New Grandstand, community hub and sports bar**

This element of the development proposal provides an opportunity to enhance the appearance of the current stand, and surrounding public realm.

The roof surfaces of the grandstand would benefit from articulation. We would welcome more details to show the appearance of the roofscape, and materials.

**Affordable Housing**

We seek clarity as to what is meant by affordable housing. Eg. Is this social rented or shared ownership? The design of the affordable housing block is substandard in quality and does not improve much upon the dated social housing of the 60’s and 70’s. The sketch design shown is unmatched to the aspiration shown in the exhibition for illustrative purposes. We are concerned that there is no public realm or amenity space provided. The opportunity to make a better quality provision shouldn’t be missed.

**PBSA**

While we accept the justification for the inclusion of student housing we consider that the amount of PBSA is too much and takes up space that should be developed to provide more affordable and social rented housing, and help alleviate (contribute to?) local housing needs in Twerton. We would also recommend that in order to relieve the pressures on local housing the student accommodation should be block let to Universities and make provision for 2nd and 3rd years.

**Heights**

The proposed heights at 6 and 7? storeys is too high. Most of the site proposed to e developed is in the ‘Valley Floor’ location and the Bath Buildings Heights Strategy sets heights at 4 storeys + 1. High density sustainable housing doesn’t have to mean building high.

Buildings of the proposed height and bulk would be much taller than the average building height and against the grain and domestic scale of the townscape in Twerton, where blocks of flats are usually three storeys at the highest. In this sense they would fail to respect or respond to local context or character.

We are concerned that the height and bulk would be over powering and over-dominating in the townscape and in turn would visually intrude in views into and out of this part of the Conservation Area, and harm longer views across the World Heritage Site from the city skyline.

The heights of the PBSA blocks would need to be brought down by two storeys. They should be no taller than the football stand and step down the hill to respect and work with the topography of the land.

**Co-living apartments**

This concept is interesting. We would be keen to find out more about how the living space is arranged and what facilities are shared.

**High Street**

Refurbishments and remodelling is welcomed. The provision of retail and active frontages is essential to the character of the High Street. We have some concerns about increasing heights.

**Parking**

We would welcome the provision of car free student accommodation. However there would need to be a better system of monitoring this to be effective. We would also support residential development being car free, with increased cycle provision and car club spaces, provided there are restrictions on parking in the local area.

**Details**

We would welcome details of the palette of materials proposed for all elements of the scheme.

**Conclusion**

Bath Preservation Trust would be unable to support the development in its current form for the following reasons:

* The amount of PBSA is too high.
* There is an under provision of affordable housing.
* The height of the buildings at 6 and 7 stories is too high and would harm local townscape character and views across the World Heritage Site.

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

**Bath Preservation Trust**

For reference:

Twerton sub-area character appraisal:

<https://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Conservation-areas/twerton_draft-june_2018_low_res.pdf>