



BATH
PRESERVATION
TRUST

19/02276/FUL

Twerton Park, High Street, Twerton

Mixed-use redevelopment of Twerton Park and adjoining land, comprising of; replacement spectator stand, new east terrace and playing pitch (levelling with 3G surface); 12no. affordable dwellings (C3 Use), 33no. co-living apartments (Sui Generis); 356 beds of student accommodation (Sui Generis); community function space (D1 Use); gymnasium (D2 use); commercial units (A1/A2/A3/A4/A5 and AA Uses); modifications to the external appearance of the existing retail and residential units (providing 6no. additional apartments) between 105 and 116 High Street; associated landscaping and public realm works.

Bath Preservation Trust fully supports the principle of redevelopment in this location to provide a mix of uses and retain Bath City Football club on its historic site. Appropriate redevelopment has a huge potential to bring public benefit and regenerate and integrate the site with the local area and enhance this part of Twerton. 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 much more could be done to reduce the impact of the PBSA element of the scheme and enhance the overall quality of Twerton and reinforce its sense of place.

In summary the Bath Preservation Trust regrets that we would be unable to support the proposal in its current form for the following reasons:

- There is too much PBSA.
- There is an under provision of affordable housing.
- The height of the buildings at 6 and 7 stories is too high and height and bulk would harm the character of this part of the conservation area.

We encourage the applicants to make changes to this application in response to the following grounds for objection.

Student housing

Placemaking Plan policy SB14 identifies significant scope for residential uses on the site. This scheme includes a large amount of student housing and the Trust urges the Council to rigorously test the case made in the viability assessment which is the justification for the amount student accommodation. The applicant should be required to show irrefutable evidence that other uses and types of residential use have been considered and tested and

why such uses, together with less student accommodation does not meet the required viability level.

The emerging West of England Joint Spatial and Bath Local Plans¹ both require that an additional 300 homes are found in Bath, through windfall sites and intensification of existing allocated sites, such as Twerton Park. Any additional capacity achieved through intensification of development on this site should therefore be devoted to helping Bath reach this new target and should not be used for student housing.

We believe that this site should provide a much greater amount of mixed tenure housing, including private and social rented, and keyworker housing to meet local need.

We have concerns whether the claimed public benefits brought by proposed student housing are deliverable and guaranteed in reality.

We are pleased to see that our suggestion to show future adaptability of the student housing has been included.

There has been an under provision of affordable housing - 15 units (30%) would be required as a minimum rather than 12 as proposed.

The Trust therefore objects to the amount of student housing, the application does not include any evidence that this would not prejudice the achievement of the aims of policies DW.1 (*District-wide spatial strategy*) and B1 (*Bath Spatial Strategy*).

Impact on the character of the conservation area and setting of listed buildings

While we recognise that there are some lower than average buildings on High Street that might benefit from being raised to 2-3 storeys, buildings at 6-7 storeys remain out of keeping with the domestic traditional village townscape which is 2-3 storeys in character. Buildings of the height and bulk proposed would have a discordant relationship with the surrounding townscape character. The proposed heights and massing would be over dominant in the local townscape and would harm local townscape views.

Development of this height and massing would also have an overbearing impact on the setting of Grade II listed Rose Cottage.

We have concerns about the approach to design and materiality which is commercial and industrial in nature, and we would call for a response that respects the village character of Twerton, for example locally sourced traditional materials that are referred to in the Twerton Conservation Area Character Assessment include

The proposal is therefore contrary to the requirements of PMP policies BD1 (*Bath design policy*), DW1 (6) (*cultural and heritage assets*), D1 (*general urban design principles*)(c) and (d) and Policies D2 (*local character and distinctiveness*) and D3 (*urban fabric*) as well as HE1 (*historic environment*).

¹ BTH2 Proposed Policy approach for housing, para 4.13.4

Impact on setting and Universal Value of World Heritage Site

The *City of Bath World Heritage Site Setting SPD (2013)* Chapter 5, states that one of the important characteristics of the WHS setting are “The views afforded from the city to the green hillsides, woodland and open spaces and conversely the opportunities provided by the surroundings to view the city and its surrounding landscape.”

The LVIA seeks to demonstrate that the impact of development at the height proposed, on long distance and medium distance views from the surrounding viewpoints looking into the city would not significantly harm the Outstanding Universal Value or setting of the World Heritage Site. While this may be the case, we are concerned that the height, bulk and massing is at odds with the surrounding townscape character and would not fit with the architectural and townscape homogeneity of Bath.

Other design considerations

We have concerns about 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 should have 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.

In conclusion

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.

We feel that the proposal in its current form is unacceptable and there is much scope for revision and further mitigation of the potential harm to heritage assets.