



**BPT statements to B&NES Planning Committee
3rd June 2020**

Applications **19/03838/FUL** and **19/04772/FUL**
Holburne Park, Warminster Road.

BPT objects strongly to these two applications before you for determination.

We ultimately call for these applications to be refused on the grounds set out below, and for any resubmissions to be made in a single planning application that takes account of the whole site. The piecemeal, disjointed submission of multiple planning applications, which have not suitably accounted for the overall coherence of the Holburne Park site and its contextual setting within the World Heritage Site and overlooking the Kennet & Avon Canal, risks serious harm to the landscape setting of the World Heritage Site and city-wide Conservation Area.

These further planning applications, by virtue of their position, size and appearance of the proposed residential blocks exacerbate existing overdevelopment of an already dense residential site. If approved these blocks combined with the existing new development would create an estate that when compared with the residential character of the surrounding townscape is incongruous in its layout, appearance and bulk when viewed across the city.

The height of the proposed buildings would contribute to the proposed development being prominent and overbearing and visually detracting from the setting of the Bath Conservation Area, WHS and setting of heritage assets, and principally the Kennet and Avon Canal.

The poor quality of submitted drawings, elevations, and predicted views are insufficient to make a proper assessment of the landscape and visual impact and as such the development risks harm to the setting of the World Heritage Site and character and appearance of the conservation area.

Significantly, the whole site as built has failed to provide any real affordable housing and as such does nothing to help address the housing crisis locally. The “affordable” housing so far built is under the help to buy scheme with house prices starting at 500,000 - this is not affordable housing. Nor is ‘discount market housing’ affordable housing. These applications fail to specify any definition of real affordable housing and the 18.7% discount market housing fails proposed to meet the local plan targets within an area of a designated affordable housing target of 40%, as specified within Policy CP9 of the Core Strategy and Placemaking Plan, should therefore be refused. Unintended development costs are not a valid viability argument.

In specific relation to application **19/04772/FUL**, the loss of the designated ‘school site’ to private residential development has resulted in the loss of the potential to integrate public community facilities into the development’s design. This leaves the site nothing but an estate without any community integration.

For these reasons we consider that the development before you for decision is therefore refused.