**21/01588/FUL**

**Field Between City Farm And Cotswold View, The Hollow, Southdown, Bath, Bath And North East Somerset**

Erection of 9 dwellings with associated access, parking, drainage, landscaping and ecological mitigation.

*Object*

The site forms part of the south easterly corner of the open hillside associated with Bath City Farm, situated within the Bath World Heritage Site and the indicative landscape setting of the conservation area. This is noted as an important hillside in the World Heritage Site within the 2013 WHS SPD, punctuating the otherwise-dense residential development to the south of Bath. Whilst the parcel of land proposed for development is situated just outside the conservation area boundary, the sloped hillside in the Twerton village character area is regarded as a “significant open space” within the CAA. It remains visually connected with significant views across the city and the skyline towards features such as the Royal Crescent and Beckford’s Tower, as well as being an important remainder of Twerton’s original agricultural setting and historic field system which were largely redeveloped from the mid-20th century. The early 20th century residential expansion of Whiteway to the south formed a suburban buffer between Bath and its agricultural landscape setting, of which the City Farm site is a surviving fragment, now fully enclosed from its historically rural context. Further 20th century development along its north-western and south-eastern edges (Freeview Road, Cotswold View, The Brow) have gradually eroded the extent of undeveloped land remaining. As well as being a recognised Site of Nature Conservation Interest, the Bath City Farm site is identified as an area of distinctive, undeveloped night-time character which appears as a “pool of darkness” within an otherwise built-up and well-lit area.

BPT previously objected to previous application 19/00786/FUL for the same proposal, which was subsequently dismissed at appeal on grounds of net loss of habitat and harm to biodiversity.

BPT maintains its in-principle objection to the development of this green hillside and therefore this parcel of land. The open land has never been developed and forms part of an important green hillside that is specifically identified as making a significant contribution to the setting of the World Heritage Site. Since this parcel forms part of a recognised “important hillside”, it possesses a shared, cumulative significance in the hillside’s overall scale, green and undeveloped appearance from across the valley which helps to break up an otherwise dense residential estate and visually connect Bath with its rural setting, and its retention of part of Twerton’s historic agricultural setting. Therefore, the loss of this parcel of land would neither conserve nor enhance local landscape character or distinctiveness, and would be of detriment to the hillside’s overall contribution to the OUV green, undeveloped setting of the WHS.

Our particular concern centres on the concept of precedent and ‘site creep’ as development pressures increase over time. We feel that this site must remain sacrosanct in order to protect the hillside from incremental and cumulative harm. Such harm has been shown to occur on the Granville Road ridge. If permitted, this application would permanently establish a residential use on the land parcel, and an associated increase in pressure to develop the remaining half of the site as previously refused (see application 15/02807/FUL), and would result in the boundary erosion of a significant green hillside within the Bath WHS.

Should the principle of development be deemed acceptable, we urge the retention and long-term maintenance of the shrubland habitat to the north of the site, as well as screening tree cover along the northern boundary to be conditioned as part of any permit. We maintain that the permit of development on the scale proposed along the southern, road-facing portion of the site should not be considered an appropriate precedent for future development of the northern portion of the site.

We note that no significant changes have been made to the proposed development design, and therefore reiterate our concerns that the development would fail to reinforce and strengthen local townscape character in its use of materials, form, or massing. The Hollow’s streetscape is defined in its use of medium density, well-spaced semi-detached dwellings with generous private gardens to the front and rear, a layout that is clearly visible throughout the early 20th century Whiteway and Roundhill Park developments. The use of a terraced form is more indicative of 19th and early 20th century housing closer to Bath’s urban centre, and is therefore an incongruous form in an area of lower residential density. The D&A Statement refers to unusual modern examples in the vicinity such as Cotswold View, but this does not take account of this example’s cul-de-sac location set back from the road. A terraced layout would therefore remain inappropriate in appearance and density in a high visibility roadside position and constitutes overdevelopment of the site. We maintain that any permitted development should seek to emulate existing townscape character. A reduced number of dwellings would enable a more spacious, semi-detached or detached layout.

The use of recon stone is of concern given the predominant building material within the area is natural Bath stone. We note that the roofing material is specified as “clay roof tiles” in the application form, and “concrete profiled roof tiles” in the proposed elevations. We recommend this detail is clarified to ensure consistency, and strongly recommend that a natural clay roof tile is selected to complement the area’s roofscape character. We query the absence of design information regarding the proposed solar panels, considering their position on street-facing roof slopes; we encourage the use of inset solar panels with a matte, non-reflective finish to mitigate against potential sun glare in accordance with Policy SCR2 of the Core Strategy and Placemaking Plan.

We maintain that development should be consistent with national space standards as part of good design practice and to ensure an appropriate level of amenity for future residents. We note that official floor measurements have not been provided as part of the proposed plans and encourage that the case officer requests that these are submitted.

We assert the need for high quality and locally distinctive design, should the principle of development be accepted, to mitigate visual impact to the protected qualities of the important green hillside.

We maintain that this application would result in the loss of part of one of Bath’s recognised “important hillsides” with resulting detriment to the landscape setting and OUV of the WHS, and the indicative landscape setting of the Twerton village character area of the Bath conservation area. The proposed dwelling design, form, massing, and use of materials neither complement nor contribute to existing townscape character or distinctiveness. Thus, this scheme is contrary to Sections 12, 15, and 16 of the NPPF, and Policies BD1, B1, B4, D1, D2, D3, D5, D7, HE1, NE2, and NE2a of the Core Strategy and Placemaking Plan, and the application should be refused or withdrawn.