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**Statement to Planning Committee 21/10/2020**

**20/02921/FUL**

Site Of Former Ministry Of Defence Offices, Warminster Road, Bathwick, Bath, Bath And North East Somerset

Proposed construction of 42no. new dwellings and 2no. new blocks of apartments to provide a total of 70 new homes on part of the former MOD site at Warminster Road (Resubmission of ref. 19/03838/FUL).

***Against***

**We maintain that this proposal in combination with existing and proposed developments on this site will further emphasise a harmful impact on the conservation area, World Heritage Site setting, and views.**

The appearance, height, density, and layout of the estate, particularly blocks and terraces, are inappropriate in this part of the Bathwick character area.

This application fails to provides adequate information regarding the proposed design, detailed elevations, and materials. We maintain that the use of render is not acceptable on external facing elevations.

The significance of Bath’s heritage ***has been*** compromised by the impact of development at Holburne Park, specifically the impact of the layout and appearance of the development on the setting and views across the World Heritage Site and Conservation Area. The Planning Authorities approval of the architectural style is no justification to further perpetuate harm.

We draw attention to the impact of **cumulative harm** on the setting of multiple heritage assets. (WHS, CA and listed buildings) and that **to accord with NPPF policies consideration still needs to be given to whether additional change will “further detract from, or can enhance, the significance of the (heritage) assets.”**

With regard to this application we do not agree that the proposed design response enhances the setting of the World Heritage Site and the character and appearance of the Conservation Area.

There is **no evidence** that the development works with the topography of the site as the applicant has stated.

We emphasise that that in order to prevent creep and maintain the landscape setting of Bath the development should be focused on the previously developed area. **We draw attention to the fact that a significant proportion of the proposed 70 dwellings would sit well over the established MoD perimeter fence.**

We recognise this revised application increases on-site affordable housing to 25%, and reduces the housing provision. However, this is still **WELL BELOW** the 40% target, and we remain dubious that the ‘affordable housing’ provision is genuinely affordable.

Discounted open market value housing is NOT affordable housing unless it remains at an affordable price for future households.’

‘Help to buy’ housing with a 500k price tag is NOT a TYPE of affordable housing.

The provision of only 1-2 bed ‘affordable’ apartments **will fail to provide any affordable family homes** with gardens for those who need them locally.

Unintended development costs are not a valid viability argument. And construction delays should not be accepted as justification for under provision of affordable housing or quality.

This Committee has previously refused applications for this site on grounds of failure to provide a policy-compliant level of affordable housing (without adequate viability justification), overdevelopment of the site, due to layout, height, design, and appearance) in views across the city with an adverse impact on the setting of the World Heritage Site.

**These reasons for refusal** remain applicable to the application before you today.

**The application would neither sustain or enhance views of the conservation area, Word Heritage Site and its setting; and further development as proposed would exacerbate the incongruous appearance of the site in landscape views of the highest value.**