**Appeal Representation**

**19/00786/FUL**

**Field Between City Farm And Cotswold View**

**Introduction**

The Bath Preservation Trust has existed since 1934 to protect and preserve Bath’s historic environment and its green landscape setting. We have previously objected to a larger-scale plan for the development of twenty residential dwellings on this important open hillside (see application 15/02807/FUL), and further objected to the current proposal for the development of nine dwellings on the site (see application 19/00786/FUL).

As the Inspector will be aware, this application proposes the erection of nine three-bedroom two-storey dwellings along the south-easterly boundary of the site facing onto the Hollow, directly adjacent to the existing Bath City Farm building. The site currently forms part of the green indicative context of the Bath conservation area, and is noted as an important “green hillside forming prominent features of the landscape setting” of the WHS within the 2013 City of Bath World Heritage Site Setting SPD [2013 WHS SPD]. The site is additionally included as part of the Bath City Farm SNCI, of which notable sections of the hillside have been excluded such as Freeview Road, Innox Park, and the Bath City Farm main building, due to both built development and associated domestic boundary treatments and usages of the land.

The Trust wishes to state the case for the dismissal of this appeal in the strongest possible terms.

**The Trust’s response is based on the following assertions:**

1. That the proposed development would be of direct detriment to the maintained significance of the hillside as a recognised important hillside within the undeveloped landscape setting of the WHS.
2. That this application would establish a precedent for construction, not only across the entirety of the land parcel as outlined, but the Bath City Farm hillside as a whole, which would result in the gradual, developmental erosion of a site of aesthetic and ecological significance within Bath.
3. That the proposed design fails to reflect and conform to local townscape character due to its form, scale, and use of materials, and would be an incongruous addition to the housing type prevalent along the Hollow.

We therefore refute the statements made by CSJ Planning Consultants and assert that this appeal should be dismissed.

**The Significance of the Site**

The site forms part of the south easterly corner of the open hillside associated with Bath City Farm. This is noted as an important hillside in the WHS within the 2013 WHS SPD, punctuating the otherwise-dense residential development to the south of Bath. 37 acres of the overall hillside area remains agriculturally functional as part of the Bath City Farm, which in accordance with paragraph 5.21 of the 2013 WHS SPD means that “landscape has heightened significance where it retains a land-use or character that is broadly the same as the contemporary historic uses and character associated with the OUV.” 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. As well as being a recognised SNCI, 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.

**Justification and Planning Policy**

We acknowledge that the parcel of land in question is not part of the Bath City Farm site; however, being contiguous, it continues to contribute to the overall green, undeveloped appearance of this “important hillside” and, therefore, maintains some significance in its open, undeveloped character as part of a recognised feature of the landscape setting of the WHS.

Whilst the Heritage Statement dismisses the parcel’s significance due to it having “no intrinsic heritage value of its own, that is tucked into the surrounding developed urban form on the edge of an ‘Important Hillside’”, we would fundamentally disagree with this statement. 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 as 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.

***This application is, therefore, contrary to Sections 12, 15, and 16 of the NPPF, and Policies B1, B4, HE1, NE2, and NE2a of the Core Strategy and Placemaking Plan.***

The Trust maintains, moreover, that the proposed design fails to reflect and conform to the local townscape character in its use of materials, form, or massing. The Hollow’s streetscape is clearly 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. CSL Planning raises the dwelling styles on Parry Close, Langdon Road, and Cotswold View as precedents for narrow, stepped terraces in the area; however, these samples are more indicative of the area’s backland, cul-de-sac character in which a more compressed design is utilised, “making most efficient use of the land” (CSJ Planning). This application therefore does not take account of the proposed site’s position along a primary road between Whiteway and Twerton, along which a lower density appearance and character has already been strongly established.

Therefore, the Trust asserts that the proposal would create an undesirable visual conflict with the existing development along the Hollow, and would consequently fail to suitably reflect or complement existing townscape character. The sharp contrast between the existing massing and form of the Hollow and the proposed design would result in the visual overdevelopment of the site in which the proposed dwellings would appear crowded and of an inappropriate density.

We continue to emphasise that the proposed use of materials (even in their amended form) would be visually inappropriate, and does not conform to the existing material texture of the area. The proposed use of reconstituted stone for the primary elevations is of significant concern given the predominant building material within the area is natural Bath stone. There is no suitable precedent for the use of external timber cladding within the immediate area, and we consequently fail to see how this development complements or enhances the existing architectural qualities of the townscape.

***This application is, therefore, contrary to Section 12 of the NPPF, and Policies BD1, D1, D2, D3, D5, and D7 of the Core Strategy and Placemaking Plan.***

**Conclusion**

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 we request that this appeal be dismissed.