**19/01854/OUT**

**Hartwells of Bath Newbridge Road, Newbridge Bath BA1 2PP**

Outline application with all matters reserved except for access and layout.

**Bath Preservation Trust Appeal Statement 16/02/2021**

**AGAINST**

The Bath Preservation Trust recommends that this appeal is dismissed on the basis that the inclusion of student housing prejudices the successful, policy-compliant delivery of residential accommodation on the site, and the proposed development would fail to assimilate with or respect local townscape character due to its excessive scale, layout, depth, and massing, and would constitute overdevelopment of the site with no public benefit to mitigate this harm. The proposal would neither preserve nor enhance the setting of the Bath conservation area and would harm the landscape setting OUV of the World Heritage Site.

**Student Housing**

We continue to object to the proposed development of private student accommodation on this site. The accommodation type and quantum of up to 186 student units would be contrary to the development principles established in local plan policy and would impair the successful delivery of family housing within its townscape context contrary to Policies DW1 and B1 of the Core Strategy and Placemaking Plan.

Policy SB15 allocated the Hartwell site for the “residential development of around 80-100 dwellings […] but not student accommodation, where this would prejudice the achievement of Policy DW1 and B1 in respect of boosting the supply of standard market and affordable housing” in 2015. The 2016 HELAA Findings Report emphasises the site’s allocation for “non-student residential development”. Whilst we acknowledge that up to 104 residential units are proposed on the site, meeting local policy demand, the broader objective of the policy is to maximise the residential capacity of the site whilst being “sympathetic to the Victorian context of terraced housing on the Upper Bristol Road and conscious of its appearance from higher ground.” From this perspective, the proposal would obstruct the acceptable delivery of residential accommodation on the site in a form, scale, mass, and bulk responsive to its townscape setting.

Section 1.4.4 of the D&A Statement notes that officers provided pre-application feedback in 2018 in which it was concluded that the student housing element would not prejudice the delivery of the current housing requirement. However, this was caveated by the comment that “whether the site can satisfactorily accommodate the quantum of development proposed is a separate matter…” Therefore, the Trust maintains that the inclusion of student accommodation would be contrary to Policy SB15 in which the development typology is expected to “have a comfortable scale with the surroundings” and “integrate with the surrounding context”.

**Impact on Townscape Character and the Setting of the Bath Conservation Area and World Heritage Site**

The Trust continues to object to the proposed layout, cumulative visual massing, and poor quality frontage treatment along the Newbridge Road which would be completely at odds with the low-profile, residential character of the area and would be of harm to the setting of the World Heritage Site.

The immediate setting of the site is of a two storey, mid-density late 19th century to early 20th century residential grain to the north and west, with industrial character retained to the south along the riverside. The townscape is characterised by its predominantly articulated terraced and semi-detached form set back within front gardens or boundary planting. The low form and frequent ‘gaps’ allow for glimpses of wider hillside landscape views from Newbridge Road and is an important characteristic of the landscape setting OUV of the World Heritage Site.

We maintain that the massing and deep plan of the blocks as viewed from the western and eastern approaches would be incongruous with the area’s established plan form, grain, and density, and would increase the impact of the height of the blocks on the street scene. The deep plan blocks would be visible at an angle from the conservation area and would detract from the pleasant and consistent linear terraced character and appearance of the street scene within the conservation area. Due to the solid layout of the frontage blocks and the density of the site, we are concerned that landscape views would be substantially lost, resulting in the ‘closing in’ of the streetscape with detriment to the setting of the World Heritage Site. Whilst the existing use was a “detractor” the buildings and the forecourts are low scale and open. The Trust does not therefore agree that the proposed layout is justified because it will replace a detractor.

Policy SB15 requires that “the Upper Bristol Road street frontage should be defined by an active frontage (dwellings could be arranged as houses or flats inside) and the articulation of facades and roofs should help these buildings integrate with the surrounding context”. The continuous roof ridge and absence of activated detailing, combined with the height, results in a monolithic and unbroken mass which would dominate the street scene and the approach into the Bath conservation area. Whilst the proposal includes the extension of the pavement, there is no inclusion of an active frontage treatment such as front gardens to integrate the scheme with the residential character of the street. The proposed use of the ground floor for apartments at this development stage misses the opportunity for the social activation of the streetscape, and the absence of expression on the single-aspect principal elevation fails to visually subdivide the block or integrate the development within its context, reinforcing its singular ‘apartment block’ appearance. Policy SB15 states that “an apartment typology would be appropriate for the lower part of the site” but gives no indication that this is an acceptable treatment for the site frontage, which instead should “be sympathetic to the Victorian context of the terraced housing along the road”.

With regards to the scale of development, the provision of 290 homes on a 1.49 hectare site results in an approximate density of 194.6 dwellings per hectare. As part of the 2010 issue of a Certificate of Appropriate Alternative Development for potential future residential development (see 10/03384/CAAD), Condition 1 states that “the maximum density of development on this site shall be no greater than 80 dwellings per hectare”. Within the Delegated Report, it is asserted that “the Council rejects the idea that a density of 118dph would ever be appropriate” as part of the officer’s site assessment. Consequently, the Trust maintains that the density of development would be excessive within its predominantly 2 storey terraced built environment and would constitute overdevelopment of the site. This site is therefore unable to provide the quantum of accommodation proposed without resulting harm to the appearance and character of the indicative Newbridge townscape setting of the conservation area and World Heritage Site.

In accordance with B&NES’ reasons for refusal, we maintain that the proposal would fail to reinforce local townscape character and distinctiveness due to its deep plan form, unbroken massing, scale, and density combined with the indicated height resulting in a monolithic and overdominant appearance. The proposed quantum of development would be of harm to the character and appearance of the indicative townscape setting of the Bath conservation area.