

**Application No. 19/01854/OUT**

**Appeal No. APP/F0114/W/20/3258121**

**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**

My name is Joanna Robinson, I am a Senior Planning and Conservation Officer at Bath Preservation Trust. Having been in position for 14 years I have extensive knowledge of the local character and context. My work involves reviewing and assessing development and master planning proposals, Planning Applications, and impact assessments, writing guidance on heritage matters for publication, and working collaboratively with the LPA in the development SPD’s, specifically conservation area character assessments, and the World Heritage Site Setting SPD.

In previous posts as a Conservation Officer and Planning Officer at Exeter City Council I have experience of dealing with complex planning applications, preparing Conservation Area Character Assessments, and I have appeared as an expert witness at Public Inquiries.

I hold a BA(Hons) degree in Town and Country Planning, a Masters degree in Town Planning, and a Post Graduate Diploma in Architectural Conservation.

**The Bath Preservation Trust calls for this appeal to be dismissed on the following grounds.**

**The accommodation type and quantum of 186 student units would impair the successful delivery of much-needed family and affordable housing within an appropriate townscape context contrary to Policies DW1 and B1 of the B&NES 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”.**

Whilst 104 residential units are proposed on the site, 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.”**

This proposal would therefore obstruct the acceptable delivery of residential accommodation in a variety, form, scale, mass, and bulk responsive to the townscape setting.

Section 1.4.4 of the D&A Statement notes pre-application feedback from officers 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 strongly caveated by the comment that “whether the site can satisfactorily accommodate the quantum of development proposed is a separate matter…”**

As part of the 2010 issue of a Certificate of Appropriate Alternative Development for future residential development, **the maximum density of the site was conditioned at 80 dwellings per hectare**, based on the officer’s site assessment in which it was concluded that “**the Council rejects the idea that a density of 118dph would ever be appropriate**”.

This application proposes the provision of **290 homes** on a **1.49 hectare site**, with an **approximate density of 194.6** dwellings per hectare.

The density of development proposed would be out of scale within its predominantly two-storey terraced environment, this is 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**”, and would constitute overdevelopment.

The massing and ‘deep plan’ of the large four blocks, would be incongruous with the area’s established two-storey terraced form, fine grain, and density that gives Newbridge its strong local identity. An identity that is further characterised by a significant concentration of late Victorian and Edwardian housing and a curvilinear street pattern. Front gardens and boundary hedges/vegetation make a significant contribution to the streetscape along Newbridge Road, softening the impact of heavy traffic and continuous building lines.

The deep plan blocks, by virtue of their excessive rectangular ‘L’ shaped footprint, would conflict with the pleasant and consistent linear terraced character and appearance of the surrounding townscape and conservation area. This deep plan would exacerbate the impact of the blocks’ height and massing on the Newbridge Road street scene.

While buildings of industrial and commercial character in the area may have a ‘deep plan’, the residential character of the location in which this development would sit **does not**. The proposed deep plan is not an appropriate domestic form.

The overall impact is increased massing on this site which is in direct contradiction to the surrounding residential character, this sudden change in change in scale and massing **would detract** from the cohesive character of Bath, and **therefore HARM the townscape setting.**

The solidity of the blocks fronting the road, combined with the density of the site, would have a **harmful impact** on landscape views glimpsed, specifically southwards through gaps between buildings from Newbridge Road would be substantially lost, resulting in the ‘closing in’ of the streetscape with detriment to local townscape character and sense of place within the wider landscape of the World Heritage Site.

Whilst the apartment typology is identified as appropriate for the lower part of the site, it is emphasised that the site frontage should be sympathetic to its Victorian terraced context. However, the continuous roof ridge, lack of front garden space and absence of detailing would result in a monolithic and unbroken mass which would dominate the street scene and the approach into the Bath conservation area contrary to the development requirements of Policy SB15.

**Bath Preservation Trust therefore maintains that this proposal by virtue of its deep plan form, cumulative unbroken massing, scale, density, height, and inappropriate frontage treatment, would fail to assimilate with or reinforce local distinctiveness; and would result in a monolithic and over-dominant appearance that would constitute overdevelopment of the site - development that would fail to integrate with the fine grained residential character and townscape and would therefore detract from, and result in harm to, the character and appearance of the local area.**

**With the inclusion of student accommodation, this site is unable to provide the quantum of accommodation without harm to the appearance and character of the indicative Newbridge townscape setting of the conservation area.**

**The very limited benefits do not outweigh the harm to local character and distinctiveness.**

**This application is therefore contrary to Sections 11, 12, and 16 of the NPPF, and Policies B1, B4, SB15, DW1, CP6, D1, D2, D3, D5, and HE1 of the Core Strategy and Placemaking Plan.**

**Bath Preservation Trust calls for this appeal to be dismissed.**