**14/05698/EFUL – Site of Twerton Mill, Lower Bristol Road, Westmoreland, Bath**.

Erection of student accommodation (sui generis) comprising 268 student bedrooms in studio/cluster flats and 62 bedrooms in 10 No. town houses comprising 1,2,3,4 and 5 storeys in height, together with 5 No. parking spaces (3 disabled and 2 management spaces); 96 covered cycle spaces; 2 No. covered refuse/recycling stores; covered plant rooms; vehicular access from the east (Mill Lane); emergency maintenance vehicular access from Lower Bristol Road; new hard/soft landscaping treatment, following demolition of existing industrial/office buildings.

**Object:** Bath Preservation Trust maintains its position of objection to the proposed scheme, which represents revisions to the previous application (13/01876/EFUL), to which we objected.

We are particularly concerned about an oversupply of student housing which would potentially use up brown field sites within the city. A report obtained from B&NES planning policy team concludes that there is a forecast shortfall in deliverable supply of student housing to 2021 of only 203 bed spaces. This contrasts with the following planning applications:

* Green Park – 461 bed spaces;
* James Street West – 250 (min) bed space;
* Transport Depot, Brougham Hayes - 103 bed spaces;
* Site of Old Gas Works, Upper Bristol Road - 404 bed spaces;
* Hartwells, Upper Bristol Road - 194 + 70 beds paces;

This would suggest a massive overprovision when one compares applications against need. The key issue here is that in the provision of student housing will prevent much needed affordable housing being developed on this and other brown field sites.

We are very concerned on a number of points which relate to both policy and architecture, a number of which we expressed in relation to the previous scheme for this site, prior to application 13/01876/EFUL.

In policy terms, the planning statement provided with the application puts forward a case for this development which nevertheless breaches elements of B&NES policy. First, we note that the Core Strategy (Policy B3) states the following concerning Twerton Riverside:

* The area presents an opportunity to host business that is displaced as a consequence of the residential led development of Western Riverside and the growth of the intensification of the Central Area into BWR East. Whilst Newbridge Riverside will remain the core industrial location, Twerton Riverside can provide additional flexibility. It will therefore be necessary to maintain an appropriate level of land in this area for B1c uses alongside office uses and housing.
* Risks to Newbridge and Twerton Riverside - The following [issue is] identified as key risks to the success of these areas that should be

addressed in development proposals:

1. An excessive loss of industrial space would harm Bath's mixed economic profile.

d. There is a danger that redevelopment will fail to connect to the riverside and miss the opportunity to enhance its walking and cycling route.

Secondly, the Building Heights Strategy suggests 5+1 storeys should be a maximum height even in this area which is a distance away from the City Centre.  
  
Thirdly, we are not convinced by the sequential and exception test in relation to flooding, which suggests that in fact there are more suitable sites potentially available.

In architectural terms we have further reservations, which were stated clearly previously, and as such we regret that more amendments have not been made to the scheme. Firstly, the gateway is the only substantial remaining fragment of the historic site, yet it is being treated in a way that denies its function. This gateway should have provided an emphasis and axis to the plans for the site rather than being shunted sideways as an afterthought. A regrettable local example of where an architectural element is not incorporated into the legibility of a development is of course Pinch’s Folly; such a deliberate failure in design on this site should not be permitted so easily.

Unfortunately, while we support the approach of very limited parking provision and good provision of bicycle stores, we do not believe there is adequate access to the site for drop off and delivery of students, nor is the potential for open areas fully realised. This is largely because of the transverse block placed behind the gateway, which blocks East/West access through the site and looks like an ‘added extra’. Linked to this lack of amenity and flow through the site, we regret that the applicant has not considered opening the development onto the canal; as proposed the design shuts off the canal and makes no use of the benefits it could bring to residents living in the development.

Overall, therefore while seeing elements to support in this proposal (in particular the attempt to respond through an industrial ‘aesthetic’ to the history of the site) we believe it is let down by a desire to overdevelop both in height and mass, with insufficient respect paid to the retained history and a dubious pathway through the policy framework.

We therefore object to this proposal as it is contrary to Section 12 of the National Planning Policy Framework (NPPF), policies B1, B3 and CP6 of the B&NES Core Strategy, saved policies D2 and D4 of the B&NES Local Plan and the B&NES Building Heights Strategy, and should be refused.