**13/01876/EFUL - Twerton Mill, Lower Bristol Road, Westmoreland, Bath, Bath And North East Somerset, BA2 1EW**

Erection of student accommodation (sui generis) (comprising 279 student bedrooms in studio/cluster flats and 50 bedrooms in 7 No. town houses) comprising 1, 2, 3, 4 and 5 storeys in height; together with 4 No. parking spaces (3 disabled and 1 management space); 96 covered cycle spaces; 2 No. covered refuse/recycling stores; covered plant room; 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 (revised resubmission).

**OBJECT** Bath Preservation Trust objects to this application for a number of reasons.

These objections should be set in the context that we think this scheme does have some merits. While our preference is for student accommodation to be provided on-campus if possible, we believe that the provision of purpose-built student accommodation off-campus, if there is proven need, offers the opportunity to reduce the pressure on family housing being used for student accommodation in Bath.  
  
However, 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.

In policy terms, the planning statement provided with the application puts forward a case for this development which nevertheless breaches elements of Council policy or draft policy. First, we note that the Draft Core Strategy says the following of Twerton Riverside:  
• Twerton Riverside will function primarily as a multi-use economic development area.  
• Refurbishment, redevelopment or intensification for industrial use will be welcomed at Twerton Riverside. Proposals for the loss of industrial land and floorspace at Twerton Riverside will be assessed against evidence of current and future demand, the availability of suitable alternative provision within Bath for displaced occupiers and the benefits of the alternative uses being proposed.  
• Residential-led or non-economic development led proposals will be acceptable only where economically-led development would fail the sequential and impact texts of PPS4 or is not commercially viable.  
Given there is an existing small industrial use on the site we would like to be clear where this is being displaced to; whether other industrial use was pursued on the site; and whether there has been an appropriate sequential process before the decision to the bring forward this site for student accommodation.

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, especially in light of the proposed decommissioning of the gasholder.

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.

We are pleased to see that the applicant has sought to reduce the number of students to be housed on the site, and in doing so has alleviated some of our concerns related to overdevelopment. 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 on grounds that it fails to fulfil the policy framework for the draft core strategy, the draft Building Heights strategy and the Flood sequential testing as well as being contrary to policy BH 1 on grounds on height and NPPF 132 (loss of significance of a heritage asset).