

WPCA OVERDEVELOPMENT OBJECTION SUMMARY

OVERALL

We object to the proposal to build four “villas” and “cottages” ranging in height from two to six storeys in order to accommodate 97 units on the backland. We regard the plan to build this number of units as inappropriate and unacceptable **overdevelopment**.

By virtue of their height, mass and positioning the villas will have harmful impacts on:

- The **character and distinctiveness** of Westbury Park.
- The character and appearance of **The Downs Conservation Area**.
- The **privacy and outlook of existing houses** in neighbouring roads.
- The setting of the Grade II Listed **Grace House**.

Furthermore we object to the proposed removal of so many **trees** from the north east corner of the site as this will be damaging to the character of the site and the local area, all of which is in The Downs Conservation Area.

KEY POINTS

1. Overdevelopment

The City Council specifies an optimum density of 120 dwellings per hectare for Westbury Park. The applicants suggest their scheme has a “*modest density of 60 dwellings per hectare*”. This is extremely misleading because the site is comprised of two areas – the frontage Lodges and the backland. The Lodges area with 25 apartments would be c.27 dwellings per hectare. The applicants themselves suggested three limitations on development of the backland*:

- Privacy distances to neighbours.
- An appropriate setting to the listed Grace House.
- Protection of the significant area of trees to the north east.

(* The map showing these limitations was excluded from the application material.)

Applying their own conditions suggests a ‘developable area’ of c.0.5 hectare and therefore (with 97 units) a density of c.195 dwellings per hectare. The result is a scheme that is not ‘landscape-led’ as required by the Design Review Panel but ‘building-led’, with buildings of 5 and 6 storeys which would be higher than the frontage Lodges – something the City Council stated should not be the case. *This is clear overdevelopment.*

2. The character and distinctiveness of Westbury Park

The area’s character reflects the point above about the site being in two parts – the frontage Lodges to the Downs (which continue right up to North View) and the generally two storey houses behind. The applicant attempts to argue that the character is determined solely by the Lodges and that the rear land is therefore not ‘backland’. The City Council consider it to be formally backland and therefore policy DM26 applies and development to the rear should be “ *subservient in height, scale, mass and form to the surrounding frontage buildings*”.

3. The character and appearance of The Downs Conservation Area

In terms of the impact of the proposals on views from the Downs, the applicant states that *“views of the proposed new build from beyond the bounds of the site will be extremely limited and will not alter the overall dominance of the Westbury Park frontage or the contribution which it makes to these assets”* (the Conservation Area).

Yet their own consultants have shown two views from the Downs – one image from close to the site, the other from further away - where the proposed 6 storey building is clearly visible above the Lodges and damages the significance of the Downs frontage. With one older exception, there is no other development visible from the Downs above the frontage.

Furthermore, if the close view shows the 6 storey building quite clearly, the one from further away should show that building even more noticeably. However, the consultants carefully chose the only longer distance where tall trees prevent any view of the high building!

4. The privacy and outlook of existing houses in neighbouring roads

No detailed information is provided to confirm that appropriate privacy distances have been provided from the new buildings to the immediately surrounding houses. Nor is any recognition given of the fact that such distances should be increased when – as here – the site slopes and surrounding properties are one metre or so lower. An informal check suggests that correct distances are not provided. In addition, the distances between some of the applicant’s own blocks are clearly less than even basic privacy distances required!

Though not legally enforceable, there is also the more basic point about how overbearing the new blocks would be to immediate neighbours.

5. The setting of the Grade II Listed Grace House

According to the City Council: *“The scale and massing of the proposals should be respectful to the setting of Grace House. The proposed buildings should not cause harm through detracting from the significance of the designated heritage asset and retain its role as a primary focal building within the site”*.

It is very noticeable that the setting area for Grace House noted in 1. above has now been significantly reduced and not a single image shows Grace House in relation to the new buildings, especially the 5 and 6 storey villas. In fact the applicant’s own heritage consultants state that *“the introduction of built form closer to the Listed Building to the southwest to a degree erodes the open surrounds of the asset”*.

What is even more disturbing is that one image used in many contexts since November 2021 shows Grace House and nothing more, leading many people to conclude that this shows the proposed development. It does not.

6. Loss of Trees

Apart from the ecological impact of removing many of the copse of trees to the north east corner of the site to make way for some ‘cottages’, this also has an impact on what is a key visual landmark within Westbury Park (and in the Conservation Area).