

ST. CHRISTOPHER'S SQUARE: APPLICATION NUMBER 22/01221/F OBJECTION FROM WESTBURY PARK COMMUNITY ASSOCIATION (WPCA)

1.1 This submission from the Community Association sets out our objections to planning application 22/01221/F relating to the scale, height, mass and positioning of the buildings proposed on the rear backland part of the site.

1.2 Appendix 1 outlines a more accurate description of the historical development of the site than that provided by the applicant. Appendix 2 draws attention to instances of misleading images of the proposed development provided by the applicant.

2 Summary of our objections to the planning application on the grounds of overdevelopment and design

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

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

- The character and distinctiveness of Westbury Park (section 5).
- The character and appearance of The Downs Conservation Area (section 6).
- The privacy and outlook of existing houses in neighbouring roads (section 7).
- The setting of the Grade II Listed Grace House (section 8).

2.3 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 (section 9).

3 Preamble

3.1 The primary purpose of this submission is to set out the reasons why we are opposing the planning application on the grounds of overdevelopment and design. However, we also wish to make clear that the Westbury Community Association fully supports **in principle** an ‘Extra Care’ facility on the proposed site. This is because we are aware that our community includes many people wishing to downsize yet stay in their local area. Extra care is also particularly supported if, as proposed, local people can access on-site facilities (e.g. café, gym, meeting rooms etc.).

3.2 In the context of the national need for more housing, the target requirements for Bristol, the emphasis on maximising sustainability in towns and cities and on re-using previously developed land, we do not take the view that development on the backland must be strictly subservient to the existing 2/2.5 storey housing prevailing in the surrounding area. Variations to long established local character have always taken place and can have their place today but, for this site, most definitely not through the inappropriate addition of monolithic five and six storey buildings.

4 Overdevelopment of the Site

4.1 The proposal to build 97 apartments and cottages on the backland is clear overdevelopment of the site.

4.2 The Design and Access Statement (page 136) attempts to justify this level of development by reference to the City Council's Urban Living SPD which specifies an optimum density of 120 dwellings per hectare and Council policy BCS20 which sets a minimum density target of 50 dwellings per hectare. After referring to the scheme having a "modest density of 60 dwellings per hectare" the section on density concludes "Given the proximity to the A4018, it would seem reasonable to say that for this site, the optimum density could be more than 120 units per hectare".

4.3 The 60 dwellings per hectare density figure relates to the overall site but the site is not a single coherent site. It has two very distinct parts - the frontage area and the backland - which must be treated differently on every aspect. Reasons why we believe this to be the case are set out throughout this submission and in Appendix 1 - The Historical Development and Character of the Site.

4.4 The Lodges, their front gardens and their original rear gardens area measure circa 0.9 hectare. The proposals are to convert the Lodges to 25 apartments – a density of circa 27 dwellings per hectare.

4.5 The backland is circa 1 hectare but a number of constraints mean that a significant part of the site is not developable, as the applicants themselves have accepted. In the first presentation made to the Design Review Panel in September 2021 the applicants included the drawing below:



4.6 The drawing shows three limitations on the area to be developed:

The

- Privacy distances to be maintained to neighbouring properties (the blue lines).
- The Listed Building – Grace House – and a suggested area to protect its setting (in blue).
- The major ‘copse’ of trees to the north east and some key trees elsewhere.

The result of applying these limitations is a developable area of just 0.5 hectares shown in pink.

4.7 We regard it as a telling omission not to include in the application material the developable area plan above. Indeed, the design development section of the Design and Access Statement makes no reference to this plan or explains how the distances, listed building setting and tree constraints seriously reduce the developable area.

4.8 While the City Council do not generally appear to use (net) developable areas when considering building density, we consider it important that the Council understand the development constraints on the backland and take these into consideration when faced with the claim from the applicant that the density level is modest. We strongly disagree.

4.9 The application proposes 97 units on the 0.5 hectare developable area shown in pink above and originally excluded from this applicant-defined developable area – a density of circa 195 units per hectare. Without any explanation provided, this has clearly been amended to reduce the setting area of Grace House and remove much of the area of trees in the north east of the site. We calculate this more **generously** defined developable area to be approximately 0.6/0.7 hectare, still giving a density of circa 160/140 units per hectare.

4.10 Cramming 97 units into the amended developable area can only be achieved by building high with a high site coverage and this is what is proposed, much to the detriment of the neighbouring houses, the setting of Grace House, The Downs Conservation Area and the distinctive low density character of Westbury Park. An idea of the impact that the proposed apartments will have can be gauged from the image below which was produced using architecture software and measurements from the developers’ own plans.



4.11 Quite clearly the layout arrangement is building-led and not landscape-led as is unconvincingly claimed by the applicant and questioned by the Design Review Panel in their second

response on the proposals made in December. The landscape is no more than the spaces left over after locating the new villas and cottages.

4.12 With regard to proposed Villas B and C located in the centre of the site, we agree with the City Council's response to the applicant's first Pre-Application Request that no buildings should be higher than the Lodges on the frontage. The applicant has failed to heed this advice - the cross sections in the Design and Access Statement (page 52) show that Villa B is two storeys higher than the Lodges, Villa C is one storey higher.

4.13 Paragraph 3.9 of the Planning Statement describes how the design of the scheme has evolved in response to comments received by the local community and other stakeholders during the pre-application discussions. The key changes to the scheme made in response to feedback include a reduction in building heights close to site boundaries, a reduction in the height of Villa A from four to three storeys, the repositioning of cottages away from properties on Bayswater Avenue and the re-orientation and separation of the proposed villas so that there is greater space between the villas.

4.14 While these changes are welcome they go nowhere far enough to address the major concerns expressed by the Community Association and many others over the past six months with regard to the overdevelopment of the site and the height, scale and location of the proposed new buildings. The overall number of residential units has not changed, the Villas are still far too high and will impact adversely on the character and distinctiveness of Westbury Park and The Downs Conservation Area, the privacy and outlook of existing houses in neighbouring road and the setting of the Listed Grace House. We therefore continue to adhere to the objections we have strongly and consistently expressed throughout the various developer-led consultation phases.

5 The Harmful Impact on the Character and Distinctiveness of Westbury Park

5.1 It is concerning and perhaps indicative for a scheme so reliant on design issues that the Planning Statement's section on Planning Policy (from page 19) fails to mention two important and highly relevant recent additions to the national policy picture – The National Design Guide and the National Model Design Code. Both argue that a thorough understanding of local character must be the starting point for any development standards and proposals. Appendix 1 highlights important aspects on which the applicant's understanding of local character is incorrect and incomplete, some of which are picked up below.

5.2 City Council policy DM26 specifies that the design of development proposals will be expected to contribute towards local character and distinctiveness by complying with a number of principles including: *“(vi) Responding appropriately to the height, scale, massing, shape, form and proportion of existing buildings, building lines and set-backs from the street, skylines and roofscapes; and vii. Reflecting locally characteristic architectural styles, rhythms, patterns, features and themes taking account of their scale and proportion; “*

5.3 The policy goes on to stipulate that: *“Backland development will be expected to be subservient in height, scale, mass and form to the surrounding frontage buildings.”*

5.4 The proposed development does not comply with this policy, arbitrarily extending as it does the pattern and scale of the lodges into the distinctively different rear area rather than relating to the height and scale of houses bordering this area. There is no rationale at all for doing this. The development of the rear area should be shaped as much by the smaller scale housing developments in surrounding streets as by the grander Lodges fronting Westbury Park.

5.5 **We maintain that the rear land is formally backland and policy DM 26 above must be the starting point for any determination of the application.** We believe that the policy provides sufficient grounds by itself to refuse the application as the proposed three to six storey villas on the backland are clearly not subservient in height, scale and form to the predominantly two storey houses which border the backland.

5.6 The Planning Statement makes an attempt (page 35) to argue why the rear development area is not backland and therefore not subject to Bristol City Council policy DM 26, starting with the following claim: *“The backland guidance is clearly aimed toward sites that are typically formed by adding new development behind existing development, often by making use of garden land or small outbuildings”*.

5.7 If anything, this argument makes rather than disproves the point that the rear part of the site is backland because it is behind what was, and largely still is, *“garden land”*.

5.8 Arguments are made about street frontage but the rear land does not have any (except for the tiny stretch on Bayswater Avenue).

5.9 It is then claimed that *“the proposed development is not for additional development at the rear of existing buildings”*. It clearly is exactly that.

5.10 Finally, it is stated that what is proposed *“... is a very different approach to a typical backland development, that are (sic) usually private and closed off”*. The rear land at St. Christopher's is private and closed off.

5.11 We note that the City Council appears to share with us the view that the rear land is backland. In their 8th November response to the first pre application submission there were five references to backland in the first five pages of the response.

5.12 We are not arguing that development on the backland has to be no higher than the existing two to three storey houses in bordering roads but we do maintain that the building heights should not be set by the frontage Lodges which are the equivalent height of a modern

6 The Harmful Impact on the Character of The Downs Conservation Area

6.1 The proposed six storey building will have a significant negative impact on The Downs Conservation Area, particularly on the prominent Downs frontage.

6.2 The Heritage Statement has much to say about how the proposed works to the Lodges and frontages on Westbury Park will enhance the character and appearance of the Downs Conservation Area, concluding in paragraph 8.9 on page 78 that: *“such works will have a positive impact on the character and appearance of The Downs Conservation Area in this location, and better ‘reveal’ the contribution that the villas and frontage make to both the Conservation Area and the Local Historic Park and Garden”*. We accept that the proposed improvements to the frontage Lodges and gardens will bring positive conservation benefits providing the proposed new car parking areas will have a minimal impact on the appearance and openness of the front gardens and the setting of the renovated Lodges.

6.3 Paragraph 8.9 then moves on to argue 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). This conclusion follows on from the view expressed in paragraph 7.149 on page 75 of the Heritage Statement: “From further to the west (i.e. from The Granny Downs and Westbury Road), sections of*

the upper elements of Villa B will be visible atop of, and set behind, the Westbury Park villas – see View 6 of the ‘Visually Verified Montages’. Although introducing a new element of built form into the townscape in this location, the ability to view the upper elements of the new buildings will not alter the overall dominance of the Westbury Park frontage or the contribution which it makes to the character and appearance of the area”.

6.4 We disagree with this assessment and the conclusion “*that the views will “extremely limited”*”. The image of the view from Westbury Road (below) presented in the submitted Verified Views document (page 22) clearly shows the six storey building (Villa B) standing head and shoulders above the existing Lodges and other buildings lining the St. Christopher’s and Westbury Park (the road) frontage. A six storey building protruding above the two storey frontage lodges is simply not going to blend in – it will be an eyesore.



6.5 The Verified Views document (page 25) then shows a carefully chosen far view from Stoke Road of the new development from the Downs with the six storey building very carefully hidden (with the hard-to-read blue lines) behind the only two very large trees along Westbury Road.



6.6 If the six storey building is visible from fairly close (Westbury Road) then it will unquestionably be even more visible further away and in the very many locations that do not have two large trees in the way. We note that in its assessment of the visual impact of the new buildings on views from the Downs (page 46) the Heritage Statement chose to show a carefully considered near view from the Granny Downs which also had trees blocking the view to the six storey building.

6.7 In attempting to downplay the impact of the proposed development on the Conservation Area the Heritage Statement refers to existing high rise modern buildings in the Conservation Area *“the asset (The Downs) is enclosed to the north, east and south by built form. Accordingly, outward views from the asset are principally curtailed by such Victorian development, although examples of modern development are interspersed along the boundaries as well as modern high-rise development being visible beyond”* (page 52).

6.8 Examples are given of the modern buildings - the Axa building and the (pre Conservation Area) Durdham Downs apartments. These buildings form a frontage to the Downs, they do not impact visually on historic and distinctive frontage buildings which are instrumental in defining the character of the Conservation Area. In addition, there is only one modern building that is marginally *“visible beyond”* the frontage anywhere else around the whole length of the Downs perimeter, and that was built before the Conservation Area was designated.

6.9 In addition to assessing the views of the new buildings from the Downs the Heritage Statement considers the views from the south (The Glen) and the east (Etloe Road / Bayswater Avenue). Paragraphs 7.151 and 7.154 on page 75 read:

- *“As demonstrated by View 6 of the ‘Visually Verified Montages’ (page19), Villa D will be visible in views north along The Glen”. “Despite being of a greater scale, when viewed within the context of the composition of the street as a whole, the proposed built form within the site sits comfortably with the massing of the existing buildings within The Glen ---*
- *“The ‘cottages’ proposed in the northeast of the Site will be visible from sections of Etloe Road / Bayswater Avenue” ... “this will not detract from the overall character and appearance of the area”.*

6.10 We disagree with both these statements. Villa D is at least one storey too high in this context and the six storey block is visible beyond it, and would be even more visible from views further along The Glen. The statement concerning the cottages significantly devalues the landmark importance of the copse of large trees on the site at this corner and, once again, the six storey block is clearly visible, as it is from Royal Albert Road on the north of the site (which is not mentioned in the Heritage Statement).

7 The Harmful Impact on the Privacy and Outlook of Neighbouring Houses

7.1 Bristol City Council policy DM 27 stipulates that the layout and form of development including the size, shape, form and configuration of blocks and plots will be expected to: *“Enable existing and proposed development to achieve appropriate levels of privacy, outlook and daylight”*. We contend that the proposed new Villas and cottages, by virtue of their height and mass, and their close proximity to site boundaries, do not comply with this policy.

7.2 With regard to privacy we are not aware that the City Council sets specific privacy distances but other planning authorities do (e.g. Wrexham – 22 metres between habitable rooms, Essex – 25 metres, North Somerset – 21 metres). Overall figures generally range from 20 to 30 metres. Some authorities also stipulate that where the ground slopes an increased distance will be required of the

order of two metres for each additional storey above three or more storey developments adjacent to single or two storey development. Some planning authorities also require separation distances to be greater where balconies provide significantly increased opportunities for overlooking when compared to windows.

7.3 With regard to the situation at St. Christopher's, some distances between the proposed new buildings and neighbouring houses were shown on a plan circulated by the applicant in the December 2021 exhibitions (though all were measured in different ways). However, none of the documents submitted with the planning application give the actual distances between the proposed new buildings and neighbouring properties, some of which (those in Bayswater Avenue and Royal Albert Road), are also lower by around one metre. It is therefore difficult to gauge whether the 20 metre distance standard has been adhered to. We urge the Council to check these distances.

7.4 Some changes to the height and positioning of buildings close to site boundaries were made following the public consultation round in December and January but, as some of the images in the submitted Verified Views document testify, the proposed new buildings will still have an overbearing effect on neighbours. People living in The Glen will be faced with a prominent four storey building close to the site boundary (page 19) and Bayswater Road residents will be uncomfortably close to the proposed cottages, as testified by the Verified View of the cottages from St. Helena Road (page 16).

7.5 The two cross sections which appear in the Design and Access Statement (page 82) also show the proposed new buildings having a dominating presence. These cross sections have been carefully selected - no drawings or images have been submitted which show how the proposed new buildings will impact on the most affected parts of Royal Albert Road and Bayswater Avenue.

7.6 Moving away from the relationship between the proposed new buildings and existing houses there is also a privacy and outlook issue concerning the proposed new Villas themselves. The masterplan on page 81 of the Design and Access Statement shows the close proximity of Villas B, C and D. Quite remarkably, the distances between the Villas are not marked but they appear to be somewhat less, some far less, than the often-applied minimum standard of 20 metres.

8 The Harmful Impact on Grace House

8.1 City Council policy DM31 has the following to say about listed buildings: *"Alterations, extensions or changes of use to listed buildings, or development in their vicinity, will be expected to have no adverse impact on those elements which contribute to their special architectural or historic interest, including their settings"*

8.2 The Council's stance on Grace House was set out in their 8th November response to the first pre-application made by the applicant: *"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"*.

8.3 The Council commented that the proposed building Villa E (now Villa A and reduced from four to three storeys) to the west of Grace House: *"fails to respond appropriately to Grace House in terms of its height, massing and geometry impacting on the setting of Grace House. It would be overbearing and impact the primacy of Grace House. This approach is contrary to policy DM31 concerning heritage assets. The height, scale and massing of Villa A proposed at 5 storeys would similarly overwhelming Grace House due to its proximity"*.

8.4 The comments were made on a previous design – Villa E (now Villa A) has been reduced from four storeys to three but now occupies a larger footprint. Villa A (now Villa B) is now six storeys high and has in fact been moved closer to Grace House.

8.5 The Submitted Heritage Statement quotes from the National Planning Policy Framework (NPPF) in relation to the significance of any designated asset, for example: *“Significance derives not only from a heritage asset’s physical presence, but also from its setting”* and *“elements of a setting may make a positive or negative contribution to the significance of an asset”* (Heritage Statement pages 16 and 17).

8.6 The Heritage Statement also quotes a Court of Appeal decision stating that if *“a proposed development is to affect the setting of a listed building there must be a distinct visual relationship of some kind between the two – a visual relationship which is more than remote or ephemeral, and which in some way bears on one’s experience of the listed building in its surrounding landscape or townscape”*

8.7 Having stated these principles in section 5 the Heritage Statement moves on in section 7 to assess the impact of the proposed villas on Grace House:

- *“Villa B results in the introduction of built form closer to the Listed Building to the southwest, and to a degree erodes the open surrounds of the asset”* (page 71).
- *“The construction of Villas A, B and C would result in the introduction of new built form exceeding existing buildings heights within the site in close proximity to Grace House. By virtue of their proposed heights, these buildings will result in a degree of ‘enclosure’ around Grace House, with this cumulating in a change from the existing and pre-1980s arrangement of the site. This change has the potential to detract from the ‘presence’ of Grace House within the site”* (page 71).
- *“... when the proposed buildings are considered alongside the proposed ‘landscape setting’ for Grace House, as well as the contextual change from educational to residential use, it is concluded that the level of harm that would arise from the change to the overall experience of the asset would be at the lower end of less than substantial”* (page 71).

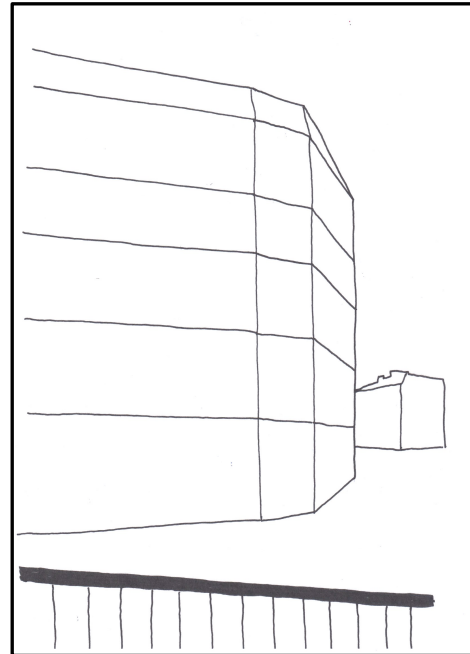
8.8 We completely agree with the first two statements but find it remarkable that, having made these assessments and previously quoted national and local policy guidance stressing the importance of safeguarding the setting of listed buildings, the consultant somehow manages to conclude that the level of harm is *“at the lower end of less than substantial”*.

8.9 The proposed buildings will cause significant harm by detracting from the setting of Grace House and diminishing the presence of Grace House as the primary focal building within the site. This is even more so with the six storey Villa B encroaching on an area shown as an area marked as *“cannot build here”* on the Sensitive Boundaries plan on page 42 of the Design and Access Statement. This plan shows a significantly reduced *“setting”* area to the west of Grace House compared with the developable area plan as shown in paragraph 4.5 above.

8.10 We note that the applicant has carefully chosen not to show images of Grace House set among its close and much taller neighbours - not a single one of the 3D representations of the villas part of the site presented in the Design and Access Statement (pages 79, 80, 135, 136, 137, 138, 152, 153) shows the relationship between Grace House and the Villas.

8.11 To address this shortcoming we present below two drawings aimed at demonstrating the significant negative impact of the proposed new buildings on Grace House. (These were produced by two different people to minimise any bias.) The one to the left barely shows Grace House given

the impact of Villas A, B and C. The one to the right is the view looking out from the entrance to Grace House with Hampton Lodge to the far right.



9 The Loss of Trees

9.1 The copse of trees, some very large, to the north east of the site is significant in terms of on-site character as well as local character. The latter point is because of its significance to Bayswater Avenue near the junction with St. Helena Road; a known local landmark and a unique example of trees within an otherwise fully developed area and part of The Downs Conservation Area.

9.2 This group of trees was shown as excluded from the possible developable area in the plan referred to above (4.6) which has not been included in the supporting documents submitted with the planning application. The group of trees were also shown marked on a plan at the December 2021 exhibition as *“retention highly desirable”*.

9.3 The Design and Access Statement recognises the importance of this group of trees, stating on page 43 that *“There is a group of pine trees to the north east corner considered to be collectively of high quality and have the benefit of natural screening at this end of the site. Significant amendments have been made during the design process in order to accommodate existing trees where possible recognising these as an important visual asset”*.

9.4 The exclusion of the group of trees from the originally defined developable area and the recognition in the Design and Access Statement of the importance of these trees would suggest that every effort was being made to retain these trees. Instead, the Tree Protection, Removal and Retention Plan produced by consultants Stride Treglown shows the removal of approximately half the trees (about a dozen) in the north east corner of the site to accommodate the cottages proposed in this area. In our view the design process has not gone anywhere far enough to protect this copse and the proposals reduce and damage its value in order to accommodate additional development.

10 Conclusions

10.1 The applicants have suggested that: *“the overall site layout has arranged the proposed new built forms such that the proposals avoid or minimise impacts on key features on site (e.g. Grace House, key trees/vegetation) and minimise visual effects in views from adjacent existing built form/residential properties and surrounding areas. The layout also allows for a high quality new external realm and landscape”* (Townscape and Visual Impact Assessment page 22).

10.2 The applicants have also suggested that *“overall, a sensitive design approach has been adopted, with a variety of mitigation measures incorporated within the proposals. The scheme responds to the local townscape character and the design process has sought to minimise adverse landscape and visual impacts and integrate with the local context”* (Townscape and Visual Impact Assessment page 35).

10.3 As we have demonstrated in this submission these bold statements about minimising visual impacts on surrounding residential properties and minimising impacts on key features are not true.

10.4 The issue of over-high buildings has been a major concern for WPCA, SCAN and many residents living close and further afield from the site since the first drawings emerged at the September 2021 workshops (see the WPCA’s own Statement of Community Involvement submitted separately). There have been some changes to the design in the intervening six months (reducing the number of blocks from five blocks to four, reducing the height of Villa A to three storeys and moving the cottages further away from the eastern boundary but these changes in response to consultation have been no more than cosmetic. The plan presented on page 64 of the Design and Access Statement shows that the number of buildings has been reduced and that buildings have been repositioned but it also shows that the average footprint of the buildings has increased. It does not show that the highest building proposed in September was five storeys high and that the new design includes both a five and a six storey building.

10.5 It is clear that the applicant’s objective from the outset has been to devise a design solution that delivers a total of around 120 apartments (although there was a suggestion in the property press from the applicants themselves to suggest¹ that a scheme with a minimum of just 100 units may be sufficient to ensure the viability of a scheme including the essential supporting facilities.

10.6 Plans evolving since the scheme shown at the September workshops have varied above and below but always remain close to delivering the 120 units. The need to deliver this number of units to achieve financial viability, possibly linked to the fact that too much was paid for the site, is almost certainly the force that is driving the inappropriate building heights and erosion of an appropriate developable area. This should not be allowed to distort planning policy requirements.

Our community – and the city - should not have to pay the ‘price’ of a clearly overdeveloped site in order to enable the financial balance sheet to add up.

10.7 We believe we have produced overwhelming argument and evidence in this submission to demonstrate that:

The development as proposed would result in serious overdevelopment of the site to the detriment of the character and amenity of immediate neighbours and to Westbury Park as a whole, and harm to the fundamental heritage character of Grace House and The Downs Conservation Area.

¹ Article in Property Wire, 09.12.2021

Development of Area Character

A.1.1 The National Design Guide states that: *“An understanding of the context, history and the cultural characteristics of a site, neighbourhood and region influences the location, siting and design of new developments. It means they are well grounded in their locality and more likely to be acceptable to existing communities. Creating a positive sense of place helps to foster a sense of belonging and contributes to well-being, inclusion and community cohesion”*. There are examples in the supporting documents of statements that fall short of demonstrating such an understanding.

A.1.2 Page 100 of the Design and Access Statement purports to describe the historical development of the site: *“To the east of the site, the boundary once formed the rural fringe and was open to expanses of countryside, until it was later developed for residential plots and further road infrastructure around the turn of the 20th Century”*.

A.1.3 This is wrong. Up to the early 19th century, Westbury Park (the road) formed a boundary to the Downs. As development moved up from Clifton and Redland, frontage land to the Downs became high value so the initial developments were no more than a narrow strip of larger properties extending from the grounds of Redland Lodge right up to North View. There was no development to the rear of any of the frontage properties and their original gardens; this all remained farm land for some time with the exception of the gardens to Redland Lodge which extended behind what were originally seven frontage Lodges (five of which are now part of the application site). The site boundary did not therefore define the line between development and open country in the last part of the nineteenth century.

A.1.4 This is an important point of disagreement because a number of the supporting reports, most notably the Planning Statement and the Design and Access Statement, describe the site as if it has a single distinctive character. It does not; it is in two clearly different parts - a point forcibly made above in our objection to the proposed development on the grounds of overdevelopment. In making this claim we have support from the submitted Townscape Assessment. Page 11 of the Statement includes the statement: *“The school site beyond the Lodges generally does not display the key characteristics of the Westbury Park Frontage Villas area”*.

A.1.5 Another example of a *“local character”* error can be found on page 5 of the Planning Statement where it is claimed that: *“Westbury Park is generally characterised by large properties set within generous size plots”*. This is simply not true. There are some larger properties (e.g. the Lodges in Westbury Park, three storey properties in Belvedere Road) but most of Westbury Park, including neighbouring roads Bayswater Avenue and Royal Albert Road, comprise two storey dwellings (if with some with attic rooms). Indeed, the houses in Royal Albert Road are best described as cottages; indeed that word is picked up in the design proposals for some of the new buildings on the site. Most properties are also on average size plots, not *“generous”*; in fact gardens in Royal Albert Road are very small.

Examples of Misleading imagery

Appendix 2

A.2.1 The use by the developers of misleading visual images has been a constant concern of the WPCA and the community throughout the public engagement programme that led up to the application. This concern in particular relates to the image below of a converted Grace House which has been used on the website, in various presentations to the community (it was the opening image at the December exhibitions), in the local free newspapers, in Bristol-wide newspapers and in articles in the professional press.



A.2.2 There are three key concerns about this image:

- It uses a distorted wide angle view which is incorrect in standard practice. (Compare this with the correct and careful use of 50mm images in the Verified Views report.)
- It distorts the chromatically 'cold' grey colour of the building into something more chromatically 'warm'.
- It very carefully shows absolutely nothing of the new high buildings proposed close to and surrounding Grace House.

A.2.3 As a result of its use, the WPCA received a large number of comments along the lines of 'what's all the fuss about tall buildings; this looks OK?'. The very deliberate choice of an image that suggests it shows the development yet only shows an existing building and totally fails to show the adjoining buildings to Grace House is an appalling example of misleading information; so misleading that its use can only be deliberate.

A.2.4 Although the above is the worst example, it is not the only one.

A.2.5 As noted in para. 8.10 in the main text, the Design and Access Statement includes 8 visualisations* of the proposed development. However:

- Some are drawn in a curious morning(?) half-light, making it difficult to properly assess the nature of the project's details, especially its materials.
- As shown in 8.11 in the main text, not a single drawing shows properly the relationship between Grace House and the large Villas.
- They all make it impossible in particular to assess the impact on surrounding properties.

(* Example overleaf)



A.2.6 As we have shown in para.6.5 in the main text, even the supposedly very carefully prepared Verified Views include an example of a view carefully chosen to mislead.