



Bath Heritage Watchdog

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APPLICATION NUMBER: 16/05504/OUT

ADDRESS: 34-35 Lower Bristol Road

PROPOSAL: Erection of two buildings to provide residential accommodation for students (up to 204 bedrooms) with ancillary accommodation and facilities and external courtyards, alterations to existing pedestrian and vehicular access, and associated infrastructure following demolition of existing building

CASE OFFICER: Chris Gomm

DATE: 15 January 2017

COMMENT: STRONG OBJECTION

Bath Heritage Watchdog ***strongly objects*** to these proposals.

Introduction

This is yet another proposal that is very likely to have an adverse impact on the Outstanding Universal values of the World Heritage Site and the views in, out and across it. The character and setting of the Conservation Area, and the setting of Listed Heritage assets are also damaged by the resultant poor public realm and streetscape. This is the outcome of a gross over-development of the site, incorporating buildings of a scale, height, mass and form completely inappropriate for the location combined with a poor and stark choice of materials. This follows closely on the heels of the similarly poor development proposed across the road for the so-called Bath Quays South.

This proposal also sees the loss of a much needed and valued facility used by both residents and businesses, along with the resultant loss of jobs, sacrificed for the creation of yet another student block. If accommodation is to be built on this site, it is affordable or social housing that is in much greater need, particularly when the Core Strategy expects additional student accommodation to be built on-campus, and while the council ignores its own strategy there will be no incentive for the University to deliver what is expected of it.

The Existing Building

Although the existing building is not of any great architectural merit and is purely functional, it is set back from the pavement and that set back adds an open character to the location. It is also of a similar scale and height to adjoining properties on this side of the road so as not to draw attention to itself or adversely impact on the setting of the Listed Newark Works complex or other nearby heritage assets. It also remains largely low key when viewed from the GWR mainline and elevated points such as Wells Road. It does not adversely impact on the views in/out and across the WHS.

Loss of Employment Space and Jobs

We are concerned and have objections to the loss of further employment space and jobs. This is industrial employment space in a central location which if lost will join Bath Press, Herman Miller, Roseberry Place and other locations which will not be replaced. There is nothing in the documentation provided to indicate where, if anywhere, Pickford's will relocate to or the fate of those currently employed. This is also a storage facility, a much needed local facility. It is about the last remaining centrally based removal and storage facility. We believe its loss is contrary to the relevant policies of the Core Strategy and emerging Placemaking Plan.

Proposed Use

We remain concerned and object to the continual usage of just about every available brownfield site being utilised for Purpose Built Student Accommodation or fronting schemes purporting to be for mixed or residential use, masking an underlying desire or future intention for student use. They also impact on the visual character of the city by being largely over-scaled monolithic blocks of an alien design that usually is in direct conflict in both design and materials with its surroundings. They and their use also create a number of residential and amenity issues that are largely outwith our heritage remit but will have an impact on the surrounding occupants.

We believe that a single use for this site is inappropriate and does not offset the harm caused to the built environment by its design. We also believe it is contrary to the aims of the Core Strategy and Place-making Plan. Should any development take place, apart from being of a lesser scale and mass it needs to show a more sympathetic approach to the location. It should be a mixed use scheme offering employment space such as start-up units and flexible residential units that offer a variety of accommodation types.

There is a concern that this is an over-spill development for the South Quays proposal with the residential element there being a mask for more student accommodation and what we understand to be a strong interest in other parts of the site by the University.

Given that unless the quoted number of rooms is built the scheme is unviable the chosen location must be wrong, and it shouldn't be built there. Achieving a specific number of rooms only equates to the excessive height, scale, mass and build-line proposed. So it must be considered that this constitutes over-development of the site.

Design and Materials

Although the outline proposal only permanently fixes the footprints and heights of the buildings, similar outlines in Bath rarely deviate far from the style and materials shown, and therefore it is reasonable to assume that this one will be similarly indicative of the eventual intentions. This means that comments on both design and materials can be broken down into sections at this stage.

- 1) Impact on the setting of the WHS and Conservation Area.
- 2) Impact of the setting of the Listed Newark Works and other Heritage Assets both designated and undesignated.
- 3) The proposed design itself.
- 4) Materials

Impact on the setting of the WHS and Conservation Area

Due to its location partially masked in some views by tall mill style buildings and near the bottom of a rising hillside the impact is going to be more cumulative than individual. The proposals for South Quays also have to be considered in the determination as well. The two combined will have the greatest detrimental effect, dwarfing, enclosing and hemming in the Newark Works site and blocking or obscuring views out across to the northern slopes. A greater series of contextual montages needs to be provided, preferably without any assumed tree cover, to assess the full impact with the proposals for South Quays rendered in and also out should they not take place. Given the indicative roof lines shown in the drawings the montages provided appear to be rather under-scaled.

Impact on the setting of the Listed Newark Works & other Heritage Assets both designated & undesignated

Here is where the greatest harm is likely to be caused should these proposals go ahead. The settings of the Listed and Undesignated Historic structures at risk from these proposals include the whole Newark Works site, Maritime House, and the Camden Mill/Bayer complex, the GWR Mainline viaduct and the historic Goods Shed, and Oak Street. This impact is not only from the over-bearing height, scale and mass but the poor overall design ethos that does not respect or reflect local character and distinctiveness in either design or materials. This is also amplified by a build line too close to the road that removes the present more open aspect of the site currently appreciated by passing pedestrians. It also will see the loss of a number of mature trees that add some greenery to the location. We object to their loss and believe any proposal should involve their retention.

Early photographs show the current site to always have been a low rise or undeveloped area, possibly to draw attention to the architectural merits of the GWR Mainline and Goods Shed and focus on the frontage of the Newark Works Foundry Building where quite clearly all the detail of design was incorporated. The current situation still reflects those design aims. These proposals will see structures that are stylistically at odds in both design and materials and not subservient to the listed building directly opposite, with a further even taller block overshadowing it. The resultant effect is likely to be oppressive, creating a trench-like approach that makes the listed building a poor cousin to the modern additions.

When combined with equally tall buildings proposed for the South Quays site the whole Newark Works site is effectively sandwiched, its relevance and its context largely lost. The aggressive hard edge created by the proposed build line also blocks the view and appreciation of the Maritime House and Bayer Building and their wider setting.

The taller block being set on a higher slope and with a high roof-line will also impact on the character and wider setting when viewed from such locations as Wells Road and destroy the current views from passengers on the trains using the GWR line. The cumulative detrimental impact when the South Quays proposals are also factored in should not be underestimated.

The Design Itself

It would appear the key driver behind this design is the need to accommodate the arbitrarily chosen number of rooms rather than provide something of quality and appearance that enhances the location. It joins the mixed bag of student blocks popping up all over the city. Of the more recent ones only Green Park is of a fitting style for its location, whereas most have a level of mediocrity that is unacceptable for a WHS. Of the others only Twerton Mill/ Carrs Mill (by the same architects as here, so they can produce better designs if commissioned to do so) makes a more than worthy attempt to fit in with its use of course rubble stone and brick under a saw-tooth roof.

Although we understand the industrial approach behind the design here, it fails badly in this location.

The North Block is a strangely narrow almost squashed design built about as close to the road as possible. This is entirely at odds with the present development which creates a sense of space. It also makes the building over-bearing and dominant. The roof pitch is out of character for the location and the elevational treatment totally bland. There is not a single horizontal line or detail to counteract the upward thrust. The whole is not helped by the lack of glazing bars on the windows, which leads to that 'blind look' which doesn't reflect the locality, or the continuation of the roofing material down the sides.

The H block behind is almost prison-like in its starkness. Its height and scale are far too great for its location on the rising ground behind the North block. It is some 5/6 storeys (at modern storey height rather than the more modest Victorian storeys) which when added to the rising ground level its impact is more like a 7/8 storey building. It will reflect the existing mill structures in height, but without the stone to glass ratio that makes the mill structures seem more modest than their measurements suggest. The same problems as the North Block afflict this one too: no horizontal detail; bland facades; no glazing bars in the windows. The elongated roofs have no ridges or stacks to add variety or break up the expanse when viewed from a distance. It shows no serious attempt to complement its surroundings. The pitches of the roofs are also considered to be too shallow for the local context.

Residential amenity is likely to be poor with little in terms of landscaping and limited amounts of natural light reaching the courtyards and rear of the North block and lower levels all around both buildings. There will also be impact from shadows cast as the sun moves round.

Materials

Most informed opinion would tend to agree that Bath has a limited palette of materials and this is what contributes to its homogenous character. Though the use of brick as a material is not opposed in principle it is the way the material is treated and distributed that is key, and the amount of it in use. The multi-patterned bonds and arrangements proposed here look confusing and haphazard. It does not gel, because the colour range does not contribute to local character and distinctiveness. Should the proposal progress we believe that stone or course stone rubble such as used on Twerton Mill should be considered.

The use of copper/metal roofing is opposed: this is completely out of context for the location. We also are not supportive of its continuation down the sides of the blocks because this forms an incongruous intrusion and does not conform to the local vernacular. It is very likely to become discoloured and untidy looking. It is also very likely that in the form proposed rainwater run-off will stain and streak the brickwork, and on the vertical elements run off and stain the pavements. Again, if approved, natural slate should be used as per Twerton Mill to ensure a better cohesion with the local form. The precedents shown are taken from examples around the world, yet it is the local palette and form that should be the yardstick.

Conclusion

In reality this should really not progress further than the outline stage as apart from the unanswered question over what is to happen to the current business and its staff, the single use of the site and the preference for students over employment or housing needs to be addressed. Turning to the proposals this is yet another disastrously inappropriate scheme that will put our WHS status at risk. It will have an impact on the setting of the Conservation Area, and severely impact the setting of the Newark Works complex and other designated and undesignated heritage assets and lead to a poorer public realm.

It is contrary to Policies WHS Setting SPD, Core Strategy B1. Local Plan ET3, CP6, D2 and D4 and fails to meet the requirements of the National Planning Policy Framework NPPF and should be decisively refused.