



Bath Heritage Watchdog

contact@bathheritagewatchdog.org

APPLICATION NUMBER: 17/03774/OUT

ADDRESS: 34-35 Lower Bristol Road

PROPOSAL: Outline application for the 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. Access, appearance, layout and scale to be determined and landscaping reserved.

CASE OFFICER: Chris Gomm

DATE: 11 September 2017

COMMENT:

Bath Heritage Watchdog Objects to the proposed plans.

As this is basically a resubmission of the refused application 16/05504/OUT offering nothing more than a token reduction in height of 380mm to one of the blocks our comment is largely as before.

The reasons for refusing 16/05504/OUT were:

1. The proposed development by reasons of its height, bulk, massing and external appearance will have a dominating, oppressive and incongruous impact upon the character and appearance of this part of the Lower Bristol Road and the wider World Heritage Site. Accordingly the application is contrary to saved policies D2, D4 and BH1 of the Bath and North East Somerset Local Plan, including minerals and waste policies, adopted 2007, policies DW1, B1, B4 and CP6 of the adopted Bath & North East Somerset Core Strategy, and policies D1, D2, D3, D5, HE1 and BD1 of the draft Bath & North East Somerset Placemaking Plan.

2. The application site is currently occupied by a well-established storage use operating from purpose-built premises. The business has nine employees based at this site. It has not been demonstrated that there is a lack of business demand for the existing building or for the site itself. It is considered that the loss of this business site will have an unacceptable impact on the local economy and as such there are strong economic reasons why its redevelopment for non-business uses is inappropriate. Accordingly the application is contrary to polices DW1 and B1 of the adopted Bath & North East Somerset Core Strategy and policy ED2B of the draft Bath & North East Somerset Placemaking Plan.

Nothing in the replacement planning application comes anywhere near overcoming the reasons identified by the DMC, so it should be a foregone conclusion that this latest submission will be refused for the same reasons. As this application was decisively refused by the DMC on design and impact grounds we see no reason, given the meagre height reduction, that there should be a u-turn on what was a sound decision.

We remain opposed to its design, use of materials, visual impact on the setting of Bath and of the listed Newark Works. We also remain opposed to the loss of employment space which we believe contravenes Policies of the Core Strategy and Local Plan and its proposed use as student accommodation which is eroding the character of the city.

Introduction

Yet another proposal that is very likely to adversely impact on the Outstanding Universal values of the World Heritage Site and the views in/out and across. The character and setting of the Conservation Area and the setting of Listed Heritage assets are also adversely affected by the poor public realm and streetscape. This is the result of a gross overdevelopment of the site by 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 used facility used by both residents and businesses along with the resultant jobs, for the creation of yet another student block. Where, if such losses are considered acceptable and accommodation is to be built on this site, is the affordable or social housing that is so much in need?

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 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 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. The Core Strategy emphasises the need for job creation, so avoidable job losses should not be favoured.

This is also a much needed local storage facility. It is about the last remaining centrally based removal and storage facility. As it meets the definition of "Community Facility" and there are no alternative facilities of equivalent community benefit proposed to mitigate the loss, we believe its loss is contrary to the relevant policies of the Core Strategy and 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 aim 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.

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 stated aims of the Core Strategy and Placemaking Plan. Should any development take place, apart from being of a lesser scale and mass it would need to be a more sympathetic approach to the location. It should be a mixed use scheme offering employment space such a 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 or intended use must be wrong. This viability claim is responsible for the height, scale, mass and build-line proposed, so it must also equate to the overdevelopment of the site.

Design and Materials

This can be broken down into sections:

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

Impact on the setting of the WHS and Conservation Area

Due to its location partially masked 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 impact assessment as well. The two combined will have the greatest detrimental effect, enclosing and hemming in the Newark Works site, blocking or obscuring views out across to the northern slopes. A greater series of contextual montages needs to be provided, preferably without tree cover in order to assess the full impact, with the proposals for South Quays rendered in and omitted to cover the possibility that they might not take place. Given the indicative roof lines shown in the drawings the montages provided appear to be rather under-scaled.

Impact of the setting of the Listed Newark Works and other Heritage Assets both designated and undesignated.

Here is where the greatest harm is likely to be caused should these proposals go ahead. 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 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 both design and materials. This is also amplified by a build line too close to the road that removes the present more open aspect of the site. 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 an low rise and 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 that. These proposals will see structures not subservient to the listed building directly opposite that are stylistically at odds in both design and materials with a further even taller block over-shadowing it. The resultant effect is likely to be oppressive, creating a trench-like approach and also a wind tunnel for the prevailing wind.

When combined with equally tall buildings proposed for the South Quays site the whole Newark Works site is effectively sandwiched, its relevance and 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. The cumulative detrimental impact when the South Quays Proposals are factored in should not be underestimated.

The Design Itself

It would appear the key driver behind this design is the need to accommodate the 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, 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) makes a more than worthy attempt to fit in with its use of course rubble stone and brick and saw tooth roof.

Though 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 building's position. 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', nor by 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 which when added to the rising ground level its impact is more like 7/8. It will almost match the existing mill structures in height but with far less style. 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. 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 the lower levels all around both buildings. There will also be the impact from shadows cast.

Materials

Most informed opinion would tend to agree that Bath has a limited palette of materials and this is what contributes to the homogenous character noted in the Outstanding Universal Value. Though the use of brick as a material is not opposed in principal it is the way the material is treated that is key along with the colour choice and the amount of it used. The multi-patterned bonds and arrangements proposed here look confusing and haphazard. It does not gel and the colour range does not contribute to the 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 because this is completely out of context for the location. We also are not supportive of its continuation down the sides of the blocks forming an incongruous intrusion which does not conform to the local vernacular. It is very likely to become discoloured and untidy looking from bird droppings. 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 would 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, when it is the local palette and form predominant in the World Heritage Site 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 planning proposals this is yet another disastrously inappropriate scheme that will put our WHS status at risk, impact on the setting of the Conservation Area, severely impact of 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 a number of Policies: the WHS Setting SPD, Core Strategy B1, Local Plan ET3, CF1, CP6, D2 and D4 and fails to meet a number of the requirements of the National Planning Policy Framework (NPPF) and should be decisively refused as before.