



Bath Heritage Watchdog

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APPLICATION NUMBER: 18/00651/FUL

ADDRESS: Unit 2, Lymore Gardens, Oldfield Park

PROPOSAL: Erection of 4no. two bedroom homes, 2no. studio apartments, 4no. one bedroom apartments and associated parking following the demolition of Unit 2, Lymore Gardens.

CASE OFFICER: Christine Moorfield

DATE: 20 March 2018

COMMENT: **STRONG OBJECTION**

Bath Heritage strongly objects to this application.

We have an 'in principle' objection to the demolition of the building which we consider to be an Undesignated Heritage Asset. The building was originally constructed to form the Hygienic Laundry in 1898. The Bath Water Works Act of 1846 extended the supply of water available to the city and in combination led to the rise of the steam laundry. By 1938 it was one of the largest in the West of England.

Red brick buildings are relative uncommon in Bath and given the close proximity to the Victoria Brick & Tile Works (now known as the Brickfields at the end of Lymore Gardens) it is likely it was constructed using bricks manufactured on this site. The fact that the owner of the Victoria Brick & Tile Works, Thomas H Delabere May, was involved in the establishment of the laundry means the importance of the building locally straddles the two businesses. The detailing on what was intended to be an industrial building shows the importance the Victorians placed on such buildings. It also should be noted that there is little of our industrial heritage left in this area with the Bath's largest brick industrial building, the Bath Press, currently being demolished.

PRINCIPLE OF DEVELOPMENT

We have looked at the recent planning history for the building and see that permission was granted previously for the conversion of the current building. Whilst a commercial/industrial use would be preferable because there is a distinct lack of employment space in this area and in Bath in general, we accept that the premise of residential has been set. The approach of conversion of an existing building is always more sustainable and thus supportable than the alternative of demolition and replacement which has a greater carbon footprint.

We remain concerned that within a matter of months of gaining permission to convert the warehouse into residential that the building is now argued to be structurally unsound that it will need to be demolished. We find it hard to believe that any sensible developer would have had plans drawn up and go through the planning process without investigating the viability of conversion first; and the interior photographs that accompanied the plans that were given planning permission show that the building was sound at the time those photos were taken.

We have read again the Structural Survey and note the comment in the Planning Statement that '*Bath & North East Somerset's Building Control Team are in support of the demolition of the property due to its poor condition which can be seen under planning application 17/03771/FUL*'. We have read the comments as directed, and note that some of the remedies proposed are precautionary, some claims made by the applicant's survey are rejected out of hand, and the worst case scenario is introduced by the word "If". We cannot see anything that suggests there is 'support' for the demolition. This clearly is a misrepresentation.

Whilst the warehouse is empty at present (though only recently so) it was used previously for the storage of quality and expensive furniture. It is difficult to believe that this would have happened if the building was in the allegedly precarious condition that the applicants want us to believe. No evidence of marketing the building as storage has been provided and therefore the statement '*The condition of the former warehouse has been proven to be unsuitable and unviable for any continuing use*' is unproven, and in view of what was recently stored there, unlikely. Neglect is not a mitigating reason.

We mention again that Farleigh Rengen (One) Ltd are a subsidiary of IESIS as is Iesis Special Structures Ltd who did the structural survey we have criticised above. IESIS are known in Bath for creating student accommodation. There has to be concern that the proposal is a front for the reuse of any build on the site for students, especially with the increase in density proposed in this application. In the undesirable position that the application is permitted we would suggest a condition precluding use as student accommodation or buy to let so that it would permanently "*meet the areas housing need*".

DESIGN

Although this newly submitted design could be considered a slight improvement over the previous design, it is far from being appropriate, or of quality.

One of the main characteristics of Oldfield Park is the uniformity of the terraces. The applicants state that the proposal reflects '*a continuation of the terrace opposite*'. We disagree. The design does not have the rhythm of the surrounding terraces and there is no step down the hill to reflect the topography, which is an essential characteristic of the terracing. This omission appears to be an attempt to attain as much height as possible, and the resultant bulk and massing is far in excess of the houses opposite, partly due to the alien roof form. The current building, being low, and with some architectural detailing, 'fits' well into the locality. It should be remembered that this site is overlooked by the surrounding area. It is not hidden.

The use of Bath Stone is something we would normally support if it looks appropriate. However the 'Proposed Visualisation' clearly illustrates how the use of Bath Stone rather than red brick in this case, jars against the adjacent red brick buildings. The use of red brick in Bath is less common for residential buildings, yet there is a terrace of red brick houses around 100m from the application site (and similarly in the Dolmeads); and most houses in Oldfield Park have an inner skin of red brick providing the main structural support.

The front elevation appears to be a mish-mash of designs, presumably because it has been driven by aiming to shoehorn as many units in as possible, and cost. Gables facing the street elevation are not a feature in Oldfield Park and the '*terraced pair*' do not have their doors together which is another key characteristic of the area.

Using a material such as perforated metal cladding may reflect industry fashion, but it does not reflect the industrial history of the Oldfield Park area. It is a material that is likely to put buyers off due to the issues with future maintenance.

It is stated that '*in contextual terms, the application site's frontage is equivalent to nearly 10 of the terraced houses across the road*'. If this is the case why are 10 houses not being proposed? The previously withdrawn application was for 7x2no bed dwellings yet this application is for 4x2no bed dwellings, 2 studio apartments and 4x1 bed apartments - an increase in density. This is clearly gross over-development of the site.

We question the inclusion of stacking car systems. Whilst this is clearly the only way that the required number of parking spaces can be achieved, we query the cost of such a system and the long-term maintenance overheads it would introduce. The documentation says that no on street parking would be lost, but access to the units will need to be kept clear and visibility splays might be required, and thus some parking would inevitably be lost. There is also the high probability of the road being blocked at "rush hour" peaks while cars are waiting to enter or exit the stacking system.

The rear elevation is totally haphazard with alien materials and could be compared to a catalogue for window designs. In fact the rear elevation is reminiscent of the reviled development of Carlton Buildings, a result of the first Sack of Bath.

TARGET MARKET

Given the location of the site, there are concerns at the target market for these dwellings. The documentation places emphasis on the local play areas, schools, doctors, etc and says that it *'will provide a much needed variety of smaller homes for the area, helping to meet the area's housing need'* but then goes on to say *'Due to limited amenity space, it is not anticipated that all of the apartments will be for family accommodation'*. If the target is to help local housing needs then the project clearly misses this mark by some way. The excess of HMOs in this area means that replacing lost family housing is the area's housing need.

DOCUMENTATION

The Planning Statement contains some inaccuracies and some statements that appear to be designed to mislead.

The buses quoted are few and far between. The 20A/20C runs 1 an hour, the 700/701 is 1 an hour during term time to Bath Spa University and the A7 is the Asda shoppers bus which runs once on a Wednesday. The 20R does not appear to run any more.

Bath Community Academy, named as one of the schools, is due to close at the end of summer term 2018.

The 'walking map' showing timings looks woefully inaccurate. It would appear that timings relate to 'as the crow flies' journeys rather than actual highway walking times.

The Planning Statements says that the only listed building close to the site is Ascension Church. This is inaccurate as Oldfield Park Junior School (formerly South Twerton Junior School) is also listed Grade II.

SUMMARY

The works, by virtue of the proposed demolition of an undesignated heritage asset, the incorrect materials, the poor design and the overdevelopment of the site is contrary to Section 12 'Conserving & Enhancing the Historic Environment' of the NPPF and Policies DW1, SD1, ST1, CP6, D1, D2, D3, D5, D6, D7 and HE1 of the Core Strategy and Placemaking Plan and should be refused.