



## Bath Heritage Watchdog

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APPLICATION NUMBER: 18/00770/FUL

ADDRESS: Chivers House, Windsor Bridge Road

PROPOSAL: Demolition of existing building. Redevelopment of the site for a mixed use scheme comprising the erection of one 9 storey building and one 7 storey building to provide student accommodation (Sui Generis), comprising 199 studio bed spaces and communal facilities together with 8no. affordable studio dwellings; and 570sqm of office space (Class B1) with associated external works, access, landscaping and parking.

CASE OFFICER: Chris Griggs-Trevarthen

DATE: 1 April 2018

COMMENT: STRONG OBJECTION

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Bath Heritage Watchdog **STRONGLY OBJECTS** to this application

This objection is based on:

- Height, Scale and Mass;
- Design Approach and Inappropriate Materials;
- Impact on the Conservation Area and Outstanding Universal Values of the World Heritage Site;
- Loss of Employment Space;
- Proposed Use;
- Loss of potential Transport Link.

## **Introduction**

Once again Bath is faced with a further threat to its unique heritage status and that threat (as with so many recent developments) comes in the form of yet more student accommodation to a design that many regard as inappropriate in scale, form and mass along with architectural approach for Bath, and from an architectural studio that has previous evidence of providing such designs. They certainly lack any degree of the essential character of Bath, often described using the term 'Bathness'.

It can be said with some certainty that their previous large scale incursion into the city, Bath Western Riverside, has not been met with universal approval and all but the first phase of the Western Riverside was condemned by the World Heritage Committee.

It can also be said that they seem to have learned nothing from the past as the design approach and ethos largely remains the same - massive, monolithic, angular and jarring towers that bludgeon their surroundings into submission. There are even the same tired clichés being used, such as Venetian Riverside Palazzos to describe them. In our opinion they are nothing more than misplaced 'architectural statement buildings' totally out of character for Bath.

We also believe the description of this being a mixed use scheme as questionable. The token provision of a small amount of office space does not make up for the employment space this entire site did and could again create. We note that it has been designed so that it could easily be retro-fitted for student usage should there be no take up of the office offer.

The siting of these blocks at this location also would clearly put an end to any transport link utilising the former Midland Railway Line and was earmarked in the Bath Western Riverside Planning Documents as the Bus Transport Route. Plans for the nearby approved Roseberry Place development clearly show the site and bridge as reserved for future transport infrastructure projects. It would therefore seem that this proposal is in conflict with local planning policies.

## **Height, Scale & Mass**

It seems clear that the Western Riverside Landmark/Gateway buildings acted as a catalyst for the recent trend in overtly tall structures along the river corridor. Perhaps now the policymakers and decision takers can see the folly of pursuing this approach and approving it in the first place. The developers are clearly basing their heights on the Riverside towers, their existence being a given green light for structures of this height in this location. They are becoming the new normal for the river corridor. This is a misconception and outright folly as it was clearly stated in the master plan that these Riverside towers would be unique one-offs. Unfortunately they are not being treated as such and we feel they will not be the last of the breed as the two towers proposed and approved in outline at Bath South Quays shows.

What is proposed are two incongruous behemoths of 9 storeys and 7 storeys to join the two current leviathans built and under construction on the Bath Riverside site. When added to the Roseberry Place development and its own so called 'nodal' building of 7/8 storeys the whole location will become a dense mass, an impenetrable wall of concrete steel and glass, marching inexorably eastwards and westwards along the river. The World Heritage OUV makes a point that Bath is designed to a human scale, and anything above four (Georgian sized) storeys above pavement level with the top storey within a mansard roof will need to have "Bathness and be of exceptional design (like the former "Empire Hotel") in order to be appropriate.

Apparent height will be amplified when viewed from river level by the raised nature of the location at the deck height of the bridge and by the hemmed in and enclosed nature of the site. Given the compact nature of the site and the scale and mass of what is proposed the question of overdevelopment has to be raised. The whole relative low-rise and more modest scale of the location is being inexorably altered in character by the steady encroachment of higher and higher developments. What is proposed is not even aided by a graceful design. Two ill-suited poorly grounded and top heavy blocks crowned by hard harsh angles and jarring juxtapositions of out of context materials.

### **Impact on Conservation Area and World Heritage Site**

Though on the border edge of the Conservation Area the proposed structures will clearly have a colossally detrimental impact on it. Its effect renders the term Conservation Area almost a nonsense. Equally the impact on the setting of views in/out and across and OUVs of the World Heritage Site is going to be devastating.

The long views clearly show the continuation of the impenetrable wall or 'barrier' that the UNESCO Mission Inspectors were so concerned about, but they mostly cover the north/south views and are no substitute for fully worked up photo montages. The impact on views from the southern slopes is likely to be considerable, particularly lower down those slopes. The way the views are being filled in by the Roseberry Place development form a start point. The renders also fail to include the Bath Press development which continues the trend of overly tall buildings to the south side of the Lower Bristol Road. You only have to travel around the city skyline to see the dominant impact of the Western Riverside and how it fails to gel through blocky form, poor materials and incongruous styling. In particular the landmark buildings stand out and jar and show the supreme folly of such structures on the valley floor and the misguided and ill-judged decision-making that approved them. The City certainly does not need more.

### **Materials**

We cannot say we are supportive of the proposed choice of materials. The grey and buff brick is not part of the architectural palette of Bath. We also have concerns over the use of bronze particularly at these elevations. The way the materials are used also leads to the top heavy appearance.

## Use

We object to the proposed use as the location is already at breaking point and littered with student accommodation and blocks with more to come. It is completely unbalancing the local demographic. There is also little likelihood that the construction of these blocks will free up any local housing as has been proved before by all the other student accommodation which falsely made the same claim. We normally do not comment on proposed uses but feel we need to emphasise the point particularly when there is a strong demand for local housing, affordable starter homes, and employment space. It should be noted that this location is in the Enterprise Zone and policy prohibits and excludes student use. As stated above the token office space does not off-set this, and should not fool anyone. We note the provision of affordable housing within the scheme but note this is embedded in the student element and question the whether this is practical or likely to be taken up.

## Transport Links

Though the documents state there is the potential for a sustainable transport link and the railway bridge may be brought back into use, this scheme would effectively block any future more substantial mass transit route linking the city centre to Newbridge and beyond to Bristol utilizing the former railway line. Given the pressure placed on the local authority to solve congestion and travel in Bath and the considerable amounts of money put in to transport consultations, is this a route the Council is willing to take, particularly if the site's use as a transport route is enshrined in its own policies?

## Conclusion

This proposal seems at odds with a number of the Councils own Policies and Planning Documents i.e. the Building Heights Strategy, and the Bath Western Riverside SPD. It has the potential by virtue of its height, scale mass and design to put Bath's World Heritage Status at risk by causing severe detrimental impact and harm to the Character and Setting of the World Heritage Site. It has a detrimental impact on views in/out and across the World Heritage Site and the setting of numerous heritage assets. It would fail to preserve or conserve the character of the Conservation Area. In its current form the scheme is contrary to Policies B1, B4, B5 and CP6 of the BANES Core Strategy carried forward into the Placemaking Plan, and Policies B3 and SB9 of the Placemaking Plan (especially B3's "*presumption in favour of retaining land and premises in the B1, B2 and B8 use class*" and bearing in mind the close proximity of the Bath Press site, SB9's "*Purpose built student accommodation in this area is not acceptable*") and therefore should be decisively refused.