



Bath Heritage Watchdog

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APPLICATION NUMBER: 18/03797/FUL

ADDRESS: Chivers House, Windsor Bridge Road

PROPOSAL: Demolition of existing building and redevelopment of the site to provide 95no. dwellings across two separate buildings. External works including hard and soft landscaping and site clearance works with land set aside for the future facilitation of a Sustainable Transport Route. Proposed vehicular access to Windsor Bridge Road and provision of 26no. vehicular parking spaces and cycle parking

CASE OFFICER: Chris Griggs Trevarthen

DATE: 22 February 2019

COMMENT: STRONG OBJECTION

Bath Heritage Watchdog strongly objects to this proposal.

While we note the revision of the design and the change of use from student accommodation to 95 housing units (none of which are affordable, we note) our strong objection still remains. Despite the change of design from two overtly tall tower structures to two lower but still tall rectangular blocks our objection remains based on height, scale, mass, design approach and inappropriate materials.

Some comments carry forward from the now withdrawn scheme. Despite the revisions, they remain relevant.

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 that some of them are constructed the policymakers and decision takers can see the folly of pursuing this approach and approving it in the first place. Developers are clearly basing their heights on the riverside towers, on the assumption that their existence gives a green light for structures of this height in this location, when in fact they are disallowed by the Western Riverside SPD and should not have been given permission (and UNESCO's Mission to Bath criticised Phase 2 onwards of the Western Riverside plans and asked for a redesign, which never happened).

They are nevertheless being wrongly promoted as the new normal for the river corridor. This is a misconception and outright folly as it was clearly stated in the masterplan that these structures would be unique one-offs. Unfortunately they have not been and we feel will not be the last of the breed as the two blocks proposed here and those approved in outline at Bath South Quays shows.

What is proposed now are two rather lumpy and largely incongruous blocks. 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. Regardless of the reduction in height from what was proposed they still match that of the tallest element of Roseberry Place.

Now that the full impact of that development is clear for all to see and its wide ranging impact on the setting and views across the city. It would seem folly to create further harm. We also note the sketch in the Design and Access which shows two more structures of a similar scale on Stable Yard.

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 over-development 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, (for Bath), blocks that still remain poorly grounded but which now are more bulky than before. They also appear bland and featureless, which will emphasise the incongruous appearance of the blocks.

Impact on Conservation Area and World Heritage Site

Though, on the edge of the Conservation Area, the proposed structures will clearly have a harmful, detrimental impact on it. Along with the negative impact on the Conservation Area, the effect of which renders the term Conservation Area almost a nonsense, comes the harm done to the Outstanding Universal Values of the World Heritage Site. . Equally the impact on the setting of views in/out and across and OUVs of the World Heritage Site is going to be negative.

The World Heritage Site Management Plan (which is effectively Bath's promise to UNESCO to look after the World Heritage City) states that "*Residential properties form most of the building stock, with building height relatively consistent and low-rise*" and that "*The Action Plan contains guidance over the height of new buildings and design values to guide sensitive development proposals within the City*". There is also within the Management Plan a description of the palette of materials which contribute to the homogeneous appearance of Bath. This development in its current form is wholly incompatible with the World Heritage Management Plan.

We remain concerned about the continuation of the impenetrable wall or ‘barrier’ that the UNESCO Mission Inspectors were so concerned about. The impact on views from the southern slopes is likely to be considerable, particularly lower down. The way the views are being obstructed by the Roseberry Place development is just a start point. To this should be added the Bath Press development which continues the trend of overly tall buildings to the south side of the Lower Bristol Road.



Photo taken from Bath City Farm, Kelston View

You only have to walk around the city skyline to see the dominant impact of the Western Riverside and how it fails to fit in the OUV of Bath through blocky form, poor materials and incongruous style. 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. They detract from the Royal Crescent and almost render it invisible – in fact the historic environment fades into the distance while the blocks dominate.

The UNESCO Mission Inspectors reported their concerns about the plans for the Western Riverside in 2008; and based on that, in 2009 the World Heritage Committee “*Urges the State Party to submit to the World Heritage Centre and ICOMOS, for review, a time-bound revised plan for the second and third phases of the Bath Western Riverside project, including revised density and volume of the ensemble, so as not to impact on the Outstanding Universal Value of the property, its integrity and on important views to and from the property*”, guidance which was provoked by the blockiness of the then proposed buildings (which have since been built and then formed the model for other planning applications), and of the height of the “landmark buildings” on the riverside. That recommendation was ignored and all the offending buildings have been or will be built. The City certainly does not need more of the style that was so roundly condemned. If the UNESCO Mission were to return, they would no doubt be thoroughly dissatisfied.

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. It all adds to the rather sterile appearance.

Conclusion.

This proposal seems at odds with a number of the Council's own Policies and Planning Documents especially the World Heritage Site Management Plan, 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 more severe detrimental impact and harm to the Character and Setting of the World Heritage Site, and will have an adverse 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 and Policies D1, D2, D4, D5 of the Local Placemaking Plan and therefore should be refused.

We also consider that an application for 95 households should not be approved unless there is a reasonable proportion that is "affordable". There will be a developer who will propose a scheme with that as a pre-condition, even if the current applicant won't.