



## Bath Heritage Watchdog

contact@bathheritagewatchdog.org

APPLICATION NUMBER: 18/05047/FUL

ADDRESS: Plumb Center, Locksbrook Road

PROPOSAL: The demolition of the former Plumb Centre and Genesis Lifestyle Centre and the erection of a 4 storey (plus mezzanine) mixed use building for 1354sqm of B1c Light Industrial, 364sqm of D2 Assembly and Leisure, 61 student studios and 42 student ensuite rooms in cluster flats

CASE OFFICER: Sasha Berezina

DATE: 22 February 2019

COMMENT: STRONG OBJECTION

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Bath Heritage Watchdog strongly objects to this application

This objection is based on design grounds, material and impact on the setting of listed buildings and undesignated heritage assets. The proposed usages of buildings are largely outwith our remit; however, we remain concerned at the continued increase in proposals for large scale student accommodation and the large monolithic blocks designed to house them.

Such developments are usually over-scaled and include inappropriate materials for the palette of Bath (as defined in the World Heritage Management Plan), which do not sit well in their surroundings. This application falls into that category. We see no “in principle” reason why the location is not suitable for residential use which was what was stated at the public consultation, though the area was originally laid out as an industrial estate and there may be noise problems from industrial delivery transport. On its proposed use we will just say there is no objection to the use by the gym or business start-up units but if housing is proposed alongside, we would prefer residential housing especially affordable/key workers (ideal given the close proximity of the hospital).

We believe there is no justification for more purpose built student accommodation in this location, because now every bit of land suitable for housing that goes to student accommodation instead makes the mandatory housing targets in the Core Strategy even harder to meet.

## **Design**

While we agree there is no architectural merit in the two existing buildings and have no objection (in principal) to their demolition, they do not have any adverse impact on the character of the area either. What is proposed clearly will. A massively overbearing, brutally stark, semi-industrial design - part warehouse, part barn, part water tower, clad in a black metal material and totally out of context with its surroundings. The whole design is also grossly over-scaled for the location. Most of the surroundings are low rise, either single or two storey industrial type, or two/three storey domestic type. There is nothing of this height, scale and mass or angular design. What is proposed rises to some six storeys and it will dwarf and dominate the surroundings.

We are not fans of green roofs as these are seldom maintained. The addition of these and the use of trees/bushes at a raised height do nothing to enhance the design. A nicer design would not need to be concealed by planting.

We can see no local context or justification for the zig-zag fenestration that covers the outside of the structure. Most of the industrial buildings use either panels, stonework or render. The design is wholly inappropriate, industrial or not.

## **Materials**

The black cladding proposed again is not considered appropriate or justified. It neither forms part of local context nor follows the Bath palette. We were informed at the public consultation that this colour of material was a preferred option by the local authority at the pre-application stage. Whether this was true or merely a way to deflect the question we do not know, but it is not for the local authority to show preferences for design and materials except perhaps for location design codes.

## **Impact on the setting of Listed Buildings**

One of the biggest concerns has to be the impact that this over-bearing and highly inappropriate design will have on the setting of the Grade II listed Herman Miller Building. Given that a listed building has a parallel location to this structure and be overpowered by its close proximity allied to its domineering height, scale and mass, the harm caused will be considerable. This application, if permitted, will dwarf and subjugate the Herman Miller structure which sat unharmed by the buildings to be demolished.

Given its height and visual bulk there should also be consideration given to its impact on the setting on the Grade II listed Former Herman Miller factory on the Lower Bristol Road (now Lidl). It will be clearly visible from that setting.

## **Impact on setting of possible undesignated Heritage Assets**

We would also mention the impact on the two small structures that lie close to the east of the site. The former Telephone Exchange (now Phil Weeks Welders) and the building now occupied by a vets that could have been a Co-op shop or a Laundry? These are structures of the 1920-30s that could be considered of local importance because so few inter-wars buildings now survive in Bath.

## **Conclusion**

The design, height, scale, mass and materials of this proposal are entirely out of keeping and context for this location. We also believe that this location was part of the designated Enterprise Zone and should thus be for industrial use. It also appears to be in contradiction of Policy CP 10. For the reasons stated above this proposal is contrary to Policies B1, B4 and CP6 of the BANES Core Strategy CP6, D2, D5, HE1, B4 BD1 of the Placemaking Plan and should therefore be refused.