



## Bath Heritage Watchdog

contact@bathheritagewatchdog.org

APPLICATION NUMBER: 20/03166/FUL

ADDRESS: Regency Laundry, Lower Bristol Road

PROPOSAL: Erection of two buildings of up to four storeys comprising co-living accommodation with co-working space to the ground floor, alongside landscaping works, cycle parking and disabled car parking bays following demolition of existing buildings

CASE OFFICER: Chris Griggs-Trevarthen

DATE: 20 September 2020

COMMENT: OBJECTION

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Bath Heritage Watchdog objects to this Application.

We believe this application should be refused on the following grounds: design, overdevelopment of the location, and questions over its proposed use because there are parking policy conflicts.

We have no argument that the current building is of little architectural merit and it is insignificant in rather than contributes to the public realm and therefore we would have no objection to its demolition on those grounds. The site however does have significance on industrial heritage grounds and we see nothing in the application that marks this, nor properly justifies its loss.

If there is nothing in the existing structure that retains those links to its past history, then something to give context could be incorporated. This could be a piece of equipment from the laundry (if such a thing exists) that could be placed inside the entrance, or a small exhibit illustrating the site's previous history, accessible to the public. The most visible link to the sites past still remains the stream yet we see no incorporation of this feature into the landscape design.

## Design

The opening paragraphs of the Design and Access Statement claim “*High-quality architecture, sensitive to the local setting with a simple palette of façade materials taking inspiration from Bath’s industrial heritage*”.

Unfortunately we feel this is far from the case. The selections of contexts show mostly poorly designed student blocks from around Bath and a couple of supposedly local ones including one from Bordeaux! What we have here is a mix and match design based on elements of all these. It is, in our opinion, not of ‘*high quality*’ nor an honest reflection of local setting in what is after all a world heritage site. The significance of the buildings directly opposite being Grade II listed and thus important in the local context has been ignored.

Starting with the façade which is the bit most people will see and which will have the biggest impact on the setting of the nearby listed buildings, there is considerable room for improvement. The off-set glazed entrance throws the whole out of visually aesthetic balance. It should be centrally placed. As in all designs of this type horizontal detail is forgotten about. There are no contemporary interpretations of string courses or cornices and no detailing of windows such as cills. We also feel it would have benefited from the addition of a roof.

The rest of the elevations show what is now standard for blocks of this type, of long stretches of wall with little or no set back and articulation and clad in an ‘off the shelf’ range of materials dominated by the ‘see it everywhere’ metal cladding mounted vertically. The point about lacking horizontal detail is continued on all elevations.

Once again as is now commonplace, the roofscape is completely overlooked. It is just the token bit of ‘semi-mansard and flat roof topped with sedum’ approach. Given that the whole locality of the church, the school and all the surrounding terraces are topped with red clay tiles why was there not a neighbourhood approach to this taken? What is proposed is not sensitive to the local setting. Nor does it recognise that Bath has a seagull problem; a sedum “island” amongst tiled roofs will make it particularly attractive as a nesting site.

One of the poorest features of the design is the stand alone element. This resembles some sort of hay barn of agricultural design. We appreciate the lack of windows in the elevation overlooking the terraces is for privacy reasons but the elevational treatment could have been better handled.

The flood risk assessment identifies the river level as the main risk of flooding and therefore the flood zone 2 designation of the site appears to offer a measure of safety. However the 1968 flood was caused by the run-off of torrential rain on the southern hills and the resulting floodwater did reach the site, as photographs taken at the time show. The flood risk assessment should include all the risks, not just the fluvial risk.

As a final point we would question why, when developers are building a claimed co-living design of homes for people, would they want to design a structure based on Baths Industrial Heritage? Surely it would be more appropriate to use the vernacular of the existing housing stock rather than industrial models or the student blocks offered as contexts, for inspiration. Also, why would semi-permanent residents want to live in co-living accommodation with the long-term reliance on communal kitchens and an inherent lack of privacy. Temporary residents (such as students) on the other hand would find the residential company of others a benefit.

Although not specifically covered by existing planning policies, the internal layout proposed will be almost impossible to adapt for the Government's current coronavirus policies, and the wisdom of granting permission for what the Government policies will define as an uninhabitable building does need to be considered.

### Materials

We again ask why the use of more industrial inspired materials for a housing block? It is described as a '*simple palette*' yet some of the elevations have up to seven different materials incorporated into them. None of them could be considered '*sensitive to local setting*' which is just stone, wood and glass (and tiles or slates for the roof)

### Overdevelopment and Proposed Use

It seems clear that to maximise the number of units given the constrained limits of the site, the design is compromised resulting in a cramped hemmed-in feeling, the addition of the out of place stand alone block (to avoid extra height in the main block?) points to overdevelopment.

We also have fears regarding the proposed use, given that the original proposal for this site was for student accommodation and because of the "co-living" description in the application. This would make it impossible to prevent student use should there be no take up of the current offer. Ideally we would ask that if the proposal is accepted a condition is placed to prevent this, but we suspect that once the co-living residential use is permitted the use class will not allow differentiation of who is allowed to occupy it, despite the area around it already being saturated with student lets. There are also different parking provision standards in Policy ST7 depending on occupation, being different for permanent residents compared to students. For that reason it needs to be made clear who will be co-living, or else Highways will not know which parking standards to apply to the application.

If it is intended for students, then the fact that the universities have stated that they need no additional student accommodation, and that some of the existing PBSA's have advertised rooms on the AirBNB website indicating that there is already over-provision of this type of accommodation, does need to be taken into account.

### Conclusion

A number of the concerns and objections described above could have been raised at a stakeholder event, so we have to point out that we were not made aware of such an event, whether on-line or locally presented, nor saw any advertising pointing to this.

We believe the current application does not comply with a number of local and national policies, particularly Core Strategy policy CP6, Placemaking Plan policies D2, D5, HE1 (and probably ST7), and therefore in its current form it should be refused.