

BATH HERITAGE WATCHDOG

Public Realm and Movement Strategy for Bath City Centre Consultation Draft January 2009

RESPONSE ON BEHALF OF BATH HERITAGE WATCHDOG

This is the initial response of Bath Heritage Watchdog based on the draft consultation document.

INTRODUCTION

Given the concerns expressed to Bath Heritage Watchdog by the UNESCO/ICOMOS mission that Bath & North East Somerset Council should do more to engage in genuine consultation with groups such as ourselves, as Chairman, I am most perplexed that at no stage has Bath Heritage Watchdog been approached, consulted or been asked to engage or contribute during any part of process.

At the recent exhibition of this proposal at Green Park, Bath Heritage Watchdog were promised a presentation. This has, so far, failed to materialise. The public exhibition was at the end of January, 3 weeks into the consultation process and poorly advertised.

As Chairman, I am also concerned over reports that people purporting to be from Bath Heritage Watchdog have been consulted. At no stage has anybody been authorised to give an opinion or represent Bath Heritage Watchdog on this strategy. If the reports are correct, the views expressed must be considered those of the individual(s) concerned and not those of Bath Heritage Watchdog.

Given the size and complexity of the documents, compounded by their unnecessary overwordiness, this has to be considered a brief summation. This has not been helped by a lack of flexibility or willingness to extend, even briefly, the consultation process, despite an expressed desire to make the process easier. Most of the comments by necessity must reflect our remit and therefore relate to heritage and design issues. Other issues such as transport, etc will be mentioned where they conflict with these issues.

(NB The page numbers relate to those in the Consultation Draft)

THE DOCUMENT

P4 Forward

This gives the first clue that, once again, a style is to be imposed not consulted on. The Leader of the Council states “to deliver distinctive, modern solutions”.

P6 Introduction

Is the first indication of the adoption of a Euro-centric (as opposed to an individualistic) approach, with references to Copenhagen and Freiburg. The hierarchy of the car is to be replaced by the hierarchy of the transport package.

P6 The Strategy

The streets are only reclaimed for the table and chair and in a number of places are to be shared with the bus.

P7 Future Policy Context

Brings in one of the driving forces behind all this - the “vision”. It must be pointed out that this “vision” has not been consulted on, debated or made genuinely open to the public: largely being the preserve of business groups and residents associations. It also has yet to be adopted as part of the Local Plan and cannot take precedence over it. It also is in direct conflict with a number of stated policies in the local plan.

The chart on the same page shows the World Heritage Site Management Plan, Local Plan and Transport Plan appearing to have been shunted off into a siding. All becomes subservient to the “vision”.

P8

The first reference is made to a Bath pattern book. We fear that that pattern is predetermined and follows that laid down in the comment on P4 and by the illustrations that pepper the document. Because of the different characteristics of Bath, one distinct pattern does not suit every area.

P14 Orchestra without a Conductor

It should be pointed out that even the world’s greatest orchestras would sound entirely different given a different conductor, e.g. an orchestra would adopt an entirely different approach under the baton of John Elliott Gardner than if given the same piece of music conducted by Pierre Boulez.

P14 Decline of the Public Realm

There is little disagreement that a large percentage of Baths’ streets are not worthy of a World Heritage City.

The decline of the public realm is in a large part due to the local authority in its failure to adopt a coherent approach, in its slipshod attitude to the implementation of planning policies designed to protect listed buildings and the lack of effective enforcement to control unauthorised development.

Bath has never been a finished composition, more a sum of its parts. To use the musical analogy again it is an unfinished symphony but it is largely a classical symphony with its form strengthened by the late romantics. The fear here is that its final movement will be in the style of Harrison Birtwhistle.

P14 Constricted Movement

Bath's geographical location and largely unaltered medieval street plan are natural constrictions. The grand parades, boulevards and parks are largely set outside this confined core. We can't help feeling an underlying theme running through this document is that these proposals largely want to restrict people to where the shops are, (see later comment relating to Widcombe and Walcot) however well they are dressed up. There will always be overcrowding.

P15 Lost Spaces

There is little disagreement with the broad sentiments in this section. However, it should be noted that it is the buses and not the car that have had the greatest impact on a number of the spaces mentioned, with the exception of Queen Square and in the case of the High Street, it still does. The routing of the BRT and the siting of interchanges also conflicts with the stated aims.

P15 Clutter and Disorder

Again, there is little disagreement that the streets are visually cluttered and that the state of the surfaces are poor but there is the distinct possibility (as mentioned later) that all this 'potpourri' of furniture and signage will be replaced with contemporary uniform blandness. It appears that the contribution to the clutter and disorder of the street from businesses themselves has not been taken into account. At or above head height, a tacky mish-mash of projecting signs, placards, banners and other advertising detritus compete for attention. At ground level, a veritable army of A-boards, signs, barriers, tables and chairs act as an obstacle course: all marshalled on the street corners by people waving cardboard placards.

Milsom Street and Kingsmead Square are sited as examples. Just under £1million was lavished on Milsom Street to create a giant chicane with some twee verses of poetry, the bollards and paving knocked about by the Park & Ride buses and delivery lorries and the poetry ignored by pedestrians on the great north/south shopping conveyor belt. There is the real fear that this strategy will only promote more of the same but at an increased cost.

Kingsmead Square creates disorder of another kind and has largely become a 'lost space' for the people of Bath for other reasons than the car.

At this time, we draw attention to the fact no mention has been made of how lack of civic pride and awareness has contributed to the decline of the public realm. These are issues that need to be tackled and addressed, for current attitudes will show little respect for bespoke furniture and vibrant makeovers.

In this case, along with others, it is the perception of the area that has contributed to the decline.

P20 The Case for Transforming Bath

Is there a case for transforming Bath? Clearly something has to be done but it should be remembered the city has risen and fallen but never to an extreme degree over the centuries and still remains largely intact? It is this that makes it unique. It has suffered two major transformations in the past: one out of its hands (the Bath Blitz), the other self inflicted (the "Sack of Bath") - the legacies of which still remain. Does Bath need a Government dictated third? We can find no case for transformation highlighted in the Future for Bath Vision, so this case would be clearly more of your own making.

P20 The Future for Bath

Once again, there is the link to the “vision” which does not form part of the Local Plan. Furthermore, there is mention of the Regional Spatial Strategy, the targets of which most of the Council agree are unachievable and unworkable in the context of a World Heritage Site and have little support among the general public.

The Council’s “vision” again imposes style “they promote new contemporary housing units”. The Bath Western Riverside should point you towards how popular this ideology is within Bath.

P22

Here the going gets tough. Any real facts hidden amongst spin, sound-bites and PR wordiness amongst all this can be extracted that Bath has an image problem. This gives a clue as to who all this is aimed at - to attract the young and affluent to the city (and the centre in particular) to bring increased revenue. There is little here to tempt the Bathonians who will be forced to the outskirts (which it would appear will not benefit from the fineries lavished on the centre), creating a fractured and divided city. The strategy will lead to zoning by stealth and imposed “desire lines” such as the creation of distinct east-west and north-south routes. These could see a number of cultural attractions marooned.

There are again numerous references to the imposition of style, such as new forms of architecture. There may be a place for greatly improving certain areas of the public realm but we can find no compelling case for its wholesale transformation. Surely whatever is proposed should cover the whole city and benefit all as opposed to those that throng its centre?

P24 Contemporary City

It is stated that Bath’s Town Planning and architecture were “avant-garde, radical and exiting”. Whilst in some respects this is true, it was the way that architecture was used in its setting that is key here. The central core largely followed and still follows the existing mediaeval street plan.

The wholly Georgian grand set pieces were set further out and used the terraces of the hills to achieve their impact.

The proposed more grandiose piazzas, such as Wood’s uncompleted Grand Forum, were based on existing models such as Venice. All were based on what artists and designers had seen on the Grand Tours and largely inspired by the works of Palladio. They saw Italy in Bath.

It also must be borne in mind that the Victorian and Edwardian contributions are largely responsible for the Bath we know today and those contributions should not be underestimated. Indeed there are elements of the strategy that would seem to set out to reverse them, creating gaps in the architectural fence.

The key points here are setting and context but above all homogeneity of style. These points were understood, maintained and largely respected up until the War. Even Abercrombie’s far reaching proposals embraced it. It must be strictly applied from lamp post to litter bin. Bath can be a contemporary city without being forced to look like one. It is this that sets it apart.

The Council's City-Wide Character Appraisal also makes clear mention that most of the architecture that is out of character and context has been that built within recent years. It deliberately sets out to be different.

P32 Sense of Place or "Bathness"

"Bathness" was a phrase first used by Stephen Marks in a newspaper article. These comments refer to a style of building where, if you were dropped blindfolded in front of it, and its surroundings were hidden, it would exhibit characteristics so that you would immediately think it could be Bath. It appears largely in this case that the term has been misinterpreted. It was never designed to refer to trendy "bendy buses".

The Holburne extension, Thermae Spa, "Busometer", Dyson Academy and Bath Western Riverside schemes hardly apply these characteristics. You will see our concern here if this is the style of "Bathness" to be inflicted on the public realm.

P33 Distinctive Design

We note once again the design approach is described as "a contemporary bespoke solution and that it should express and reflect "Bathness". It must be noted again that none of the contemporary solutions to Bath have thus far failed to exhibit any degree of "Bathness" whatsoever and are largely "off the shelf" solutions that speak of "Anytown". There are "Busometers" aplenty up and down the land and Feilden Clegg's Soviet-inspired blocks can be seen from Cheltenham to Murcia. We fear that it is this distinctive design solution that will apply to everything from street furniture to streetlight.

P43 Bath of the Future

This offers a vision of a utopia of well maintained streets free of clutter. As yet the documents up to this point makes no mention of litter and refuse, apart from the bespoke new litter bins. Currently the streets must rank as some of the filthiest in Europe: the cleansing team is at breaking point and if recent experience is anything to go by, the rubbish and recycling will not be picked up if there are a few flakes of snow as the bin men will be redeployed to the snowplough.

Given that there will be increased waste from the proliferation of cafés and restaurants and the streets will therefore suffer from this increased litter due to the expanded areas of public space, where are the answers to this problem?

There is the first mention of new bridges.

It is noted that the historic core is linked to new area to the east uniting old and new architecture. Once again, it is taken as read that the dictated style is modern. No matter how well it is dressed up, this is the first inference to the creation of a city within a city and a throwback to the 1970s ideas of "zoning".

P 56 Bus Rapid Transit Route

This is the first most will have of seen this. Its route would seem to have an impact on a considerable number of listed buildings and their environs, along with the associated paraphernalia (e.g. bus shelters, bus stops). It will also impact on the pavements themselves.

The route of this and the siting of bus interchanges will be seen to be in direct conflict with the sites of a number of the urban spaces, whose loss is regretted in the document.

Vaults, thermal springs, archaeology, buildings and even the new road surfaces themselves will be at considerable risk from the vibrations and weight of these bendy behemoths. The problems that York had experienced after introducing them were reported in the Yorkshire Post.

We are up to P56 and we come to the missing words round. There is no mention of the *Conservation Area* and the fact the whole area this strategy covers lies within it.

P60-62 Streets and Spaces

We are supportive of the retention, protection and management of the woodland around the city. The introduction of selective tree planting would be welcomed - the loss of the trees in Southgate being a case in point. A effective system of scrub management must be maintained at key viewpoints, etc.

However two key points stand out on p61.

P61

Westgate Street and Stall Street are laid out reflecting the mediaeval east-west thoroughfare (traffic would have consisted of horses and carts).

The statement below says the pavements are too narrow forcing pedestrians onto the road.

This conflicts with the statement below that (and this we feel is the real crux of the matter) “the pavements are too narrow restricting the placing of tables and chairs”.

Tables and chairs affect the setting of listed buildings and detract from the character of the Conservation Area. They should still be subject to strict planning regulations, e.g. Listed Building Consent and Conservation Area Consent. They should not be seen as purely a Highways issue, as would now appear the case.

It would seem the main driving force behind a lot of this is not to reclaim the street for the pedestrian but for the table and chair, thus making the pedestrian take unwarranted desire-lines to avoid them and leaving the public realm as cluttered as before - precisely the affect this strategy seeks to avoid.

“Café culture” should be contained to public areas such as piazzas and not on pavements.

We will reiterate again that a high percentage of the signs, posts and bollards, etc that detract belong to the businesses themselves, compounded by the lack of care and pride shown by the owners towards the buildings.

The uncoordinated approach towards shop fronts creates a further problem.

P64 Streets, Spaces and Riverscape

There is the first mention of refashioning Bath’s parks. Why must the public art be contemporary? It is a moot point as to whether it enhances the historic fabric. It should be

mentioned here that local and national planning policies state that local character and distinctiveness must be preserved and maintained.

We are concerned with the “one stone fits all solution” to the paving problem. This must equally remain in context to the street as the furniture. Another fear comes to mind at this point: that the buildings themselves will become isolated from the spaces that surround them, i.e. the buildings are surrounded by shiny new pavements whilst they remain dirty and neglected. Equal weight should be given to a programme of building cleaning and restoration.

P64 Key Spatial Sequences

The words ‘living bridge’ summon up visions of a Wilkinson Eyre inspired glazed Ponte Vecchio and reinforces the theory that this will be the new contemporary Bath, thus isolating it from the great set pieces and the historic core.

We are hard pushed to see any cultural attraction about the Bath Western Riverside and it would also appear that the BRT is to cut right through this area.

P65 The Key Plan

Nos 5 to 9 refer to a cultural east-west sequence. There appears little of cultural merit along this route until Kingsmead Square (with the exception of Green Park Station) unless it is to showcase the worst excesses of the ‘packing case’ architecture of the “Sack of Bath” and that the Council has spectacularly failed to learn from the mistakes of the past by promoting more carbuncles to join them. As stated earlier, these look like imposed “desire lines” possibly to create the figures to justify the bridges for instance?

The first visual indicator of a bridge between the Recreation Ground and the Parade Gardens is mentioned. Any such proposal will be **firmly resisted**.

P70 North/South Major Streets

(1) Walcot Street

This is Bath’s true artisan quarter. Apart from The Podium end, this strategy relegates it to a backwater as there appears to be no public investment mentioned for this area. Are people are being subconsciously shepherded away from this location to avoid conflict with the route of the BRT?

(2) Broad Street/Northgate Street

It would appear questionable as to whether widening the pavement at this point will enhance the pedestrian experience, given this area in effect becomes a loop road for the proposed BRT, Broad Street is the route up for the Lansdown Park & Ride and the No 2 and No 7 bus routes up Broad Street are scheduled to be upgraded to showcase routes.

A major bottleneck restricting pedestrian/traffic flow occurs outside the Old Post Office due to the positioning of the bus stops. If a BRT stop is added at this point, it will only add to the congestion. It is hard to see how widening the pavements at this point will solve the problem.

(3) Manvers Street

This street at present has a bad image problem. The visual appearance of the buildings in Pierrepont Street further detracts. A mirror of South Parade with a grand public space opening up the view of St John's Church could be one solution. Any proposed new buildings should reflect their surroundings, whatever their build-line.

(4) Milsom Street to Southgate

It does not state whether the existing surfaces of Milsom Street are to be retained. Given their newness and cost, it hardly ticks the sustainability boxes if they are not. Milsom Street is the stop for the Lansdown Park & Ride and the No 2 showcase bus route. The idea of a shared surface between buses and pedestrians rings alarm bells.

Frequent reference is made to the SouthGate Scheme and extending the pavement typology. As far as we are aware, there has been no public involvement in this and if the public realm measures are as uninspiring as the new lights and the catalogue designs of the Hess Wilmott range of street furniture, then all does not bode well.

(5) Gay Street

No major concerns.

(6) Barton Street

Again, concerns are raised over the active promotion of the "café culture" - the surroundings here are hardly congenial to al fresco dining. A major investment in the buildings is needed in this area.

(7) Westgate Buildings

Seven Dials was one of the most successful of the post-war developments. It now presents a grubby frontage of wall-to-wall takeaways with greasy, rubbish strewn pavements and the now semi-permanent wheelie bins of Sainsbury's. Unless businesses can get their act together and an effective system of City Centre Management is put in place, then throwing lorry loads of sandstone at it is hardly a solution.

(8) St James Parade

Given the increased usage of this street when the new SouthGate car park opens and that there will be periods of time when this traffic is stationary, will the vaults under the road and the buildings themselves be put at risk?

I think we should mention the SouthGate car park at this time as it would appear to impact on aspects of this proposal.

The traffic will enter the jaws of this 874 space pit via two routes - St James Parade and past the Forum to meet at the entrance, thus meeting and creating a potential conflict with the Newbridge Park & Ride and the BRT. It then disgorges itself into Manvers Street directly into the path of the BRT and the showcase bus routes. At the end of Pierrepont Street, this traffic will then be forced right over North Parade and at this point it is proposed to widen the pavement?

Also, given this extra traffic and extra public transport created by the new mini exchange at St James's Rampire, widening the pavement is hardly going to enhance the pedestrian experience. A major restoration of the south side of the parade would also be of benefit at this point.

(9) Churchill Bridge

This is an area that calls out for major improvements but it appears to be largely dismissed with a "tart up the pavement and stick in a few trees" approach. The whole area around the underpass needs major investment. The arches under the railway need revitalising with a possible use as start-up units along with a programme of landscaping. The focal point should be the listed Brunel viaduct. Following restoration, its mock Tudor towers and portals could be enhanced with a subtle lighting scheme. It would then fulfil its original function of terminating the north-south access like the Holburne does for the east-west.

We ask the question at this point: what of Widcombe, considering their residents association's input into the strategy? Again, it appears the desired aim is to keep the masses confined to the centre by an invisible city wall. This, along with Walcot, will become a "have not" area leading to further decline and fracturing.

Page 71 East/West Major Routes

(1) George Street

These are some of the widest pavements in Bath. Again, a major improvement could be made here just by moving the tables and chairs and imposing a total ban on A boards such as adopted in Edinburgh, Oxford and York. A recent survey which was carried out by the Watchdog showed some 26 A Boards on George Street between Savill's and Andrew's (a distance of approximately only 100 metres). This did not include tables, chairs and barriers.

(2) Wood Street/Quiet Street

Yet again the only justification would seem displacing pedestrians and cars for tables and chairs.

(3) New Bond Street

No major concerns here, except the colonnaded area outside Habitat needs reclaiming from its present use as a smoking shelter.

(4) Upper Borough Walls

No major objections.

(5) Bridge Street

No comments.

(6) Great Pulteney Street

We would question why, if the pavements are to be re-laid in pennant, has such considerable expense been spared (and is continued to be spared) laying the whole street in concrete slabs?

Planning applications have currently been submitted to replicate the lamp holders along Great Pulteney Street. Any new street furniture must be historically credible.

(7) *James Street West*

This is an area hardly renowned for the quality of its architecture.

(8) *Westgate Street/Cheap Street*

Here we go again, restrict the cars, widen the pavements to put the pedestrians where the cars went and hey- ho, more room for tables and chairs.

At this point we would ask the question: if every other shop is to be a café, restaurant or food and drink outlet, where are all the individual shops that once made Bath a unique shopping destination?

There is no need for a light feature - the Komedia neon sign more than fulfils this function.

On the subject of water features we are at P71 of the document and as yet no mention of public conveniences to relieve all those bursting from the surfeit of food and drink.

(9) *York Street*

Now all the comments at the Development Control Committee meeting for the Friends Meeting House all make sense. Displace car parking so Brasserie Blanc can put their tables and chairs out and of course mutilate a listed building in the process and all to facilitate corporate branding, but then again it comes with “natural policing”. Shameful.

(10) *North Parade*

The pavement on the north side is perfectly adequate until it meets the bridge where most tourists gather to take their classic picture postcard view of Pulteney Bridge fronted by the weir, but then again even that pleasure is to be denied to all if Bath succumbs to the “vision” (also see comments P70, No8 St James Parade).

The present stepped access to the gardens is locked off and needs reopening. The west pavilion should be opened up to allow direct access to the west bank of the river. We would also like to see the reinstatement of the missing lamp on the west end of the bridge. The bridge would benefit from some subtle lighting.

(11) *Lower Borough Walls*

No major concerns.

P75 Arrival and Departure Spaces

(1) *Dorchester Street*

This is largely in place and sets the tone. If the “Busometer” is to be the first building in Bath that most will see on arrival then we feel sure they will wish to make a hurried departure.

(2) *Railway Station Forecourt and Vaults Square*

How can the installation of a few paving stones be said to enhance the setting of the listed Brunel station when you have installed a 60ft 'bean can' at one end of the street and have sanctioned the demolition of Grade II* listed historic fabric (the station ramp - an integral component of Brunel's original composition of the Great Western Railway, tentatively nominated for World Heritage Status) to make way for a bland open space with yet another glazed Wilkinson Eyre extravaganza?

The loss of the ramp and interventions to the vaults are historic blunders of the first magnitude and may well prove an equal blunder on Health & Safety grounds. And all for what, a grandly termed "outdoor waiting room". It can hardly be classified as integrated if you have to walk across an open area, probably in the wet, crossing the bus exit road just to get from train to public transport.

This shows the hand of the aptly acronymed BURP at their indigestible best.

(3) *High Street*

The creation of an on street public transport interchange - the remodelling of the Guildhall to create bus stop areas.

It beggars belief that such proposals can be considered, let alone become print, as they appear to fly in the face of any local or national planning policies protecting listed buildings and their settings.

At this point we have to err on the side of caution as we not entirely sure what a "on street public transport interchange" is, it could range from a "busometerette" to a few extra bus stops. Whatever its form, any proposals that affect the setting or involve loss of or alteration to the Guildhall and other buildings will be **firmly resisted**.

A major cause of friction is caused by passengers wished to board the bus and pedestrians wishing to get past. Any proposals to site trendy ticker tape bus shelters within the environs of the Grade I Listed Guildhall and outside Bath Abbey will be **firmly resisted**.

What is plainly clear is at this point is that the Guildhall becomes in effect a Grade I Listed gyratory for the BRT. It is also clear that ,apart from its primary aim to hijack large areas of the public highway for the siting of tables and chairs and the promotion of a "café culture", the strategy is also being used as a back door attempt to implement other parts of the transport package the public won't like.

The same applies to Orange Grove. It would appear pointless to widen the pavements if the only function of Orange Grove is to act as a chicane for the gyratory.

(4) *St James Rampire*

A new place name and yet another transport interchange, this time a midi one. A couple of questions spring to mind: why so many interchanges? The word interchange would seem to indicate that you can switch modes of transport at this point, other than that it's just a bus stop.

It would be wise to consider that a large bus stop at this point would seem a recipe for a traffic jam as this will be one of the main routes for traffic entering the SouthGate car park.

Also consider the residents of the new luxury Gainsborough Spa Hotel - hardly relaxing surroundings for your expensive treatments.

Any major excavations at this point could severely impact on the hot springs and archaeology.

P76 Destination Squares and Spaces

(1) Queen Square

There is no argument with any attempt to limit or remove the traffic from this area, though it remains to be seen how this can be achieved.

Any proposals to remove the railings will be **resisted**, as will any vibrant reordering of the inner space. Only the return of this area to its original appearance should be considered.

Lighting should apply to the buildings and obelisk only. Luminosity must be strictly controlled.

(2) Laura Place

Any proposals that affects the setting will again be **firmly resisted**. Any contemporary water feature in this location is not considered acceptable (see comments about Great Pulteney Street).

(3) Pulteney Bridge

If it could be achieved, the removal of traffic from the bridge would be desirable and would be fully supported. We have noted that sections of the carriageway are currently breaking up.

Proposals to reconstruct the western pavilion would need more consultation based on detailed proposals.

Enabling activities to spill onto the street. What can we say, this could be house parties or more tables and chairs.

(4) Grand Parade

Again the driving force appears to be more tables and chairs, creating more clutter. It should be remembered this will be the eastern section of the grand Guildhall BRT gyratory. Not a background for admiring the “sublime” surroundings.

(5) Orange Grove

Forms part of the bus loop. Where are the coaches, tour buses and taxis to go?

(6) Terrace Walk

It is the surrounding buildings that need improving. The fountain should be restored and relocated in its original position. No major objection at this point to possible access to the Parade Gardens. Reinstatement of the public toilets might be an alternative.

(7) *Manvers Street/ South Parade*

See previous comments relating to this location. Any further comments would have to wait for emerging proposals. The adoption of Abercrombie's proposals for this area could act as a catalyst.

(8) *SouthGate Place*

Done and dusted - and all without any public consultation. Please see previous comments relating to the lighting and street furniture. This would be a fine alternative location for the Terrace Walk fountain.

(9) *Abbey Churchyard and Kingston Parade*

The tourist honey pot and a prime area in need of effective city centre management. Currently the area is spoilt by the ever increasing sea of unregulated tables and chairs and associated advertising along with the cacophony of noise from competing street entertainers. The desired aims will be difficult to achieve. The current restricted entrance to the Roman Baths is also a contributory factor.

(10) *Saw Close*

A scheduled ancient monument. Any proposals must be sensitive to the surrounding buildings which must be restored and protected. Any attempted bold and innovative infill buildings will be **firmly resisted**.

Any new buildings could impact on the archaeology which must be protected at all costs.

A city wall interpretive feature would be appropriate in this location. Again, yet more tables and chairs.

(11) *Kingsmead Square*

Please see previous comments relating to this area. The issues of the proximity of the college and the cinema complex have a perceived impact on this location.

No mention of whether the public conveniences in Seven Dials are to be upgraded.

(12) *Green Park/Riverside*

It is hard to provide constructive input to what are, at best, shadowy proposals. Our only comments would be our fear that this location will become a playground for modern architects and the fact it would appear to have the BRT running through it. If the route is to be believed, the BRT will run right across in front of Sainsbury's and cut through the current car park. Given that the area is largely congested with shoppers, its passage through this area will hardly be rapid, unless of course, Sainsbury's won't be there!

The shadow of "zoning" and the Cullinan Plan lurk beneath the surface. We would wish to see the Green Park market remain in the hands of independent traders and not become a corporate bazaar.

P78 Intimate Spaces

(1) Corn Market Square

We welcome the fact that the Corn Market is to be refurbished but it must be pointed out that the Council is largely responsible for its current lamentable state and action needs to be taken now.

We question the need for a bridge at this point. Whether the Environment Agency and the Waterways Board will sanction it, given the experience with other recently proposed foot bridges (e.g. the Dyson Academy) remains to be seen. Any comments on proposed new buildings will have to wait until detailed proposals are submitted.

And just in case we have forgotten there is yet more space for tables and chairs.

(2) Broad Street Place

We assume this will follow the pattern of Milsom Place and that the water feature will be equally inappropriate - the dreadful thing outside St Swithin's, Walcot springs to mind.

(3) In Front of St Michael's Church

The cycle rack is to become a destination space. Who will want to visit a traffic island with the BRT on both sides.

(4) The Rear of the Guildhall

Little to comment on here except to add the East Gate should be made a tourist feature.

(5) Abbey Green

It is questionable whether the public realm is of high quality.

(6) Burial Ground

No major objections.

(7) Green Park Station Forecourt

Hardly an intimate area, largely occupied by the Brasserie, the main thoroughfare between Oldfield Park, Sainsbury's and the college. To this will be added the attraction of the BRT running through the car park and past the station. The pedestrian crossing at this point is a nightmare, an underpass would seem a better solution.

P79 Parks, Gardens and Recreational Spaces

(1) Hedgemoor Park

The fine view of Bath from Camden Crescent is largely obscured by trees and shrubs. These need clearing and an interpretive panel put in place. It should be noted that this location is known as a quiet retreat. There is a lot to be said for it to remain that way.

(2) *Walcot Gate Park*

No major objections.

(3) *Henrietta Park*

We largely agree with the sentiments expressed. The park suffers at the moment with a negative image due to reports of anti-social behaviour. These problems that will need addressing if the park is to be made more attractive.

(4) *Sydney Gardens*

Any proposals to modernise these gardens along contemporary lines using the design of the Holburne extension for justification will be **firmly resisted**. The listed structures in the garden need careful restoration.

It must be remembered that consent for the Holburne extension was granted, despite it being in contradiction with every planning policy in the land. More importantly the Garden History Society responsible for maintaining the register of historic parks and gardens objected to it in strong terms, i.e. its style was unsuitable for the setting of the building and the gardens.

What seems to be advocated here is “we did not want the extension to match the building or the gardens, so we will remodel the garden to match the extension”.

The railway and the canal through the gardens are major set pieces and need a thorough programme of maintenance and restoration.

We have just visited the Network Rail consultation where it was stated that the Council have no intention of employing a permanent park-keeper. One of the greatest pleasures that the garden provides is the ability to view and photograph the trains (particularly the steam locomotives). This will be denied. We have been given the choice between more mutilation of historic fabric and something akin to an oversized Becher’s Brook and all because the Council will not secure the gardens.

(5) *Recreation Ground*

Whilst we would be supportive of any proposals that would relieve congestion at major events any proposal to place any form of bridge between the North Parade bridge and Pulteney bridge will be firmly rejected.

The Recreation Ground is deemed an active floodplain by the Environment Agency, so there will be little enthusiasm from them for a permanent structure.

We have seen this folly of an idea before as part of the plan for a contemporary interpretation of Woods Grand Forum. Any such proposals will again, be **firmly resisted**.

(6) *Parade Gardens*

We do not wish to see the current layout and appearance of the gardens radically altered. There is no objection to riverside walkways or a water feature, dependant on style. We repeat our objection to any form of bridge over the river at this point.

The gardens are underutilised in the winter. Could this be considered a location for an ice rink and the Christmas Market ?

(7) *Green Park*

Another park blighted at present by numerous problems. Mention is made of the 'North Quays' area design framework again - another document not available for comment or scrutiny. We believe this is the location for a 'phallus structure' or 'hanging garden'.

(8) *Norfolk Crescent*

We can find no historical evidence for a Gravel Walk. We also understand that Council has agreed with the residents not to build a footbridge in this location.

(9) *Royal Victoria Park*

We would be supportive of any restoration proposals along the lines of those already carried out. Subtle lighting effects applied to the key structures for example the obelisk, urns, statues and Temple of Minerva could be used to create a light trail.

The area around the pond needs addressing and a number of people have expressed the wish to see the boating pond put back.

P81

If these new regeneration areas are to be successfully integrated, there needs to be a major rethink of design philosophy. Materials and context must rank alongside form and massing, buildings must take their cues from their surroundings and there must be a return to classical scale and form. The classical and later styles must not be completely abandoned as an architectural form. We need to bring the 'Bathness' back to Bath.

Look and see how isolated the "Busometer" is from its surroundings. That will apply to the Bath Western Riverside (if it is ever built) - precisely the effect you are wishing to avoid.

P82 Integrating the River

It states "Bath should learn from the best examples of riverside regeneration" but sites cost as one of the major reasons why the Western Riverside doesn't and is probably the reason why it was deleted from the SouthGate Scheme entirely. One of the most successful recent schemes was Quinlan Terry's Richmond Riverside.

Why, in one of the world's most pre-eminent classical cities, is there absolutely no input from classical and urban master planners such as Quinlan Terry and Robert Adam?

P83 Proposed Projects Riverscape

As previously stated, any proposals for a bridge from the recreation ground to the Parade Gardens will be **firmly resisted**.

There are also a number of times when the towpaths are underwater and the increased potential for high water events from developments on the flood plain both up and down the river as well as global warming will have to be considered (see removal of sluice mechanism).

P84 Riverscape

(1) Riverside North

No major objections.

(2) Riverside Central

No major objections apart from the removal of the sluice mechanism (it is, in fact, a radial gate). Assuming you are serious - just how is the river to be controlled? Any such notion would render the entire Strategic Flood Risk Assessment for Bath useless and inaccurate and necessitate it having to be rewritten. The only reason offered for the removal of the sluice mechanism is that it is unsightly, that we agree with. However, it still performs a vital function.

(3) Riverside South

Again, no major objections, though any structure cantilevered out from the railway bridge would need to remain in context. We see that the Recreation Ground/Parade Gardens crossing has been sneaked in here. We still cannot condone it.

(4) North Quays

Again, no major objection except the bridge. British Waterways' refusal to grant licence for pedestrian bridge beside Newark Works should be bone in mind.

(5) Riverside West

No major objections.

P86 A City Revealed

P86-99

This largely relates to way marking and information and most of the ideas are broadly supportable. The only danger we can see would come from overkill, a proliferation of signage and way markers that will lead to the clutter that is trying to be avoided. The design of such items will need further consultation. The plastic looking boards as seen in Bristol and Exeter must be avoided at all costs. (We note this appears exactly what is in mind if the graphics are a clue).

We would like to see the reintroduction of the bronze plaques. Those that remain should be restored, those that are missing replaced or new ones made. A series of new ones representing

the great and good since the last was erected should be considered. Unveilings of these used to attract large crowds. A trail leaflet should be commissioned. Their location would ensure visitors and residents are drawn to new destinations. The blue plaque scheme is still running in London.

In addition to the resurrection of the bronze plaques, we would like to see historical information points placed at a number of key locations which would also include industrial heritage locations (there must be some tribute to Stothert & Pitt).

Particular attention should be paid to the railway and the works of Isambard Kingdom Brunel in Bath. A key requisite would be a interpretive panel at the Station. It has been indicated the wider interpretation of the significance of Brunel's station and associated railway features is required. A similar panel should be placed in Sydney Gardens.

An industrial heritage trail could be considered. Maybe the Building of Bath Museum would be interested in this?

P101

Again, our attention is drawn to the phrase radical and contemporary art installations.

P104 The Design Elements

Whilst the sentiments expressed are admirable, the devil is in the detail. It is essential to ensure there is full public engagement. We are not convinced that at any stage when anything new has been proposed, has the voice of Bath been listened to. Churchill House, Western Riverside and the Holburne are just a few recent examples.

P105

(1) Hard Landscaping Elements

We remained concerned over this "one stone fits all approach" adopted over such a wide area. We believe some alternatives should be considered to relieve the tone. Historic paving should be retained and restored using the correct materials at all points.

(2) Soft Landscape Elements

We are generally supportive of such proposals and would only ask to ensure all trees are native species.

(3) Street Furniture Elements

There is no disagreement with the fact that Bath processes a tired jumble of street furniture but it defeats the object if we end up with so-called "bespoke designs" that are just as bad or even worse. There must be full engagement on the design process.

A bad start has been made with the SouthGate Development where there has been little or no consultation and the interaction between the developer, the Council and the public is poor. We have ended up with Georgian inspired blocks festooned with something that is a cross between a Chinese lantern and a moth trap and the street furniture is from a catalogue.

We remain concerned about the amount of paraphernalia that is associated with the transport package and its style.

(4) *Lighting Elements*

Most of what is proposed could achieve that special touch if handled sensibly. Lighting effects must be kept subtle. St Stephen's Church is a fine example. Street lighting requires careful control and light spillage to the sky kept at a minimum. Lamp posts and light fittings must be in context. This is an area that would benefit from further detailed consultation.

(5) *Information and Graphic Design*

A couple of notes of caution. One would be information overload and the other proliferation of information points in all shapes and forms.

(6) *Public Art*

We have no major objections to public art. However, it must cover all periods and styles with particular emphasis on that for which the city is recognised and which most come to see.

P109-111

We hope the graphics on these pages do not show a design preference. The series of photographs show a selection of angular aggressive contemporary designs none of which exhibit and degree of "Bathness" as they are largely in Bristol. Again, we hope these do not reflect the mindset.

P120 Strategy and Design Development

(18) *Commission a Design Concept for the Parade Gardens*

As stated previously, we are opposed to any radical interventions into the Parade Gardens. There appears little justification for this and it is not the flower beds that puts off the visitors.

P121 Quick Wins

If they can be achieved most of these ideas are supportable, and at last something about the privies!

P122 Proposed Major Projects Phase One

We maintain an in principle objection to the Bathampton/Mill Lane Park & Ride and the extension to the Newbridge Park & Ride on heritage and green belt grounds. These also relate to the BRT .

The BRT and showcase bus routes will also impact on the historic core and any proposals that have an impact on/or result in the loss of historic fabric, be it pavement or buildings, will be **opposed**.

P124 Major Projects CIVITAS

The locating of a freight trans shipment on green belt land will be **opposed**.

P128 Acknowledgements

We notice with concern the input from the Urban Regeneration Panel (commonly referred to as BURP). Their penchant for the contemporary approach has led to the “Busometer” and their impartiality has already been called into question over the proposed Bath Western Riverside development.

SUMMARY

- Bath Heritage Watchdog was not consulted or asked to engage in the consultation process.
- Insufficient response time.
- The main driving force behind the strategy is the “vision”. The World Heritage Management Plan does not play a major part in this process.
- The design style of the “vision” has been predetermined. The fear is that will be repeated here.
- Lack of investment, lack of civic pride and an incoherent, inconsistent approach have contributed to the decline of the public realm.
- The strategy appears to be aimed at one specific client group.
- Too much emphasis has been placed on the “café culture”.
- A lack of city centre management has led to public highways being hijacked for business use and the failure to address business clutter and detritus.
- Tables and chairs should be contained to public piazzas, parks and courtyards and be subject to strict planning constraints and monitoring in all cases.
- An attempt to introduce the undesirable elements of the Transport Package.
- Too much priority has been placed on a “contemporary” solution.
- The strategy fails to mention the Conservation Area and the impact on the existing historic environment. Equal priority should be given to the buildings themselves.

There are a number of key points that we feel should be dropped from the strategy if future disasters are to be avoided:

- The “vision” and Transport Package being the main driving force.
- That the only solution is a contemporary one.
- Strict adherence to the cult of “vibrancy”.
- The notion of “zoning”.
- The creation of imposed “desire lines” and routes.
- The siting of a bridge between Pulteney Bridge and North Parade Bridge.
- The removal of the sluice/radial gate.
- Proposals for bridges at Norfolk Crescent and South Quays.
- Radical changes to Sydney Gardens and Parade Gardens .
- Contemporary makeovers of parks and gardens.
- Removal of the railings in Queen Square.
- Alterations to and loss of historic fabric.

In addition to the above points that we feel should be removed, the following proposals will be fiercely opposed:

- Siting of bus shelters beside Bath Abbey and the Guildhall.
- A contemporary replacement of the fountain in Laura Place.
- Contemporary infill buildings in Saw Close and Manvers Street, etc.
- Creation of freight depot and Park & Rides on green belt land.
- The effect of the BRT on historic fabric.

We would welcome the following:

- The reintroduction of bronze plaques on buildings.
- Historical information points (dependant on siting and style).
- Retention of historic pavements.
- More promotion of Bath's Victorian and Edwardian Heritage.
- More promotion of Bath's industrial heritage (to include Stothert & Pitt and the Great Western Railway).

Patrick Hutton
Chair
Bath Heritage Watchdog
PO Box 4252, Bath BA1 0HX
chairman@bathheritagewatchdog.org

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