

**18/00770/FUL - Chivers House Windsor Bridge Road Twerton Bath**

*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.*

Objection: The Trust objects in the strongest terms to this application on the basis of the use of the site and the height, scale, massing and appearance of the scheme and its associated harmful impact on the local townscape, the setting of the conservation area and the wider World Heritage Site.

As we know, this site is part of Bath Western Riverside but was earmarked in the BWR Spatial Masterplan as a Rapid Transit Route and not for development. That said, should it be decided that development can occur on this site (leading to an irreversible loss of route for any future transport infrastructure), then logically it should be considered against the parameters and codes laid out in the Bath Western Riverside SPD. In our view the scheme is contrary to the provisions of the SPD as well as local and national policy and we will expand on this later in this response.

**Height, scale, massing**

The applicant uses the argument that the local townscape character has been impacted by and therefore ‘changed’ by the addition of the landmark Egret Buildings at BWR and therefore taller buildings can be tolerated in this location. The Trust strongly refutes this argument as misguided and misleading. It is very clear in the BWR Masterplan that the landmarks at BWR were envisioned as just that; out-of-the-ordinary structures that referenced the three iconic gas holders that were a key historic part of the industrial site. The Masterplan is clear that the overall BWR site was to be developed at a level of 4-6 storeys only. Given this, the heights proposed in this scheme, especially the 9 storey building, are completely unacceptable.

The Masterplan also states that *‘any redevelopment must respect the relative proportions and enclosure ratios found within the city to fully reflect their context*. *Taller structures will need relatively more space to create the suitable balance’*. It is clear that these proposed huge monolithic buildings sit high and tight on this small site and present over-development. Notwithstanding the Roseberry Place development (to which the Trust objected on heights and which already hosts a local nodal building - Building A) this area of the townscape is low-rise and domestic scale in character, particularly on the north side of the river. Due to their height these buildings stand out as discordant ‘statement’ architecture that is completely alien to local context. They also appear top-heavy due to the design and juxtaposition of materials. In particular they present hard, sharp, high edges to the softer-edged river and its bank and to the road which may result in a cumulative canyon effect as development occurs along Windsor Bridge Road. In our view this site should present a step down in building heights to acknowledge its position at the edge of BWR and acting as a gateway to the 19th and 20th century suburbs of Twerton and Lower Weston.

**Principle of use**

We strongly object to the proposed use of the site; not only is the local area already well-populated with student accommodation blocks (leading to a high density of students well over the 10% criteria set in the HMO Article 4 direction), but this site is located within the Enterprise Area where Policy B5 is explicit in that student accommodation should be refused if it affects the realisation of the vision and spatial strategy of city. In addition the provision of studio bed spaces rather than cluster units means that this accommodation would be targeted at the luxury overseas market rather than the normal student; therefore not easing pressure on the HMO market. The spatial strategy as laid out in Policy B1 of the Core Strategy shows a clear focus on the creation of high quality office space and housing as top priorities and the Enterprise Area is one of the key areas for delivery of this strategy. Brownfield development in the Enterprise Area should deliver public, economic and strategic benefits for the city; this scheme clearly would not achieve these benefits (though we acknowledge the small amount of office space this is more of a gesture towards a mixed usage than a meaningful delivery of space).

**Impact on the WHS and adjacent conservation area**

We acknowledge the LVIA’s submitted but would say that given height is a key issue, the use of a label ‘approximate area of site’ is completely inadequate. The four images showing the building outline in context do help in assessing the impact of the scheme but these are close range and there are no long range across city views showing the outline of the building in situ. It is clear when standing on one of the ridges overlooking the city that the visual prominence of the Egret Buildings is high, therefore it is clear that these buildings if agreed will protrude aggressively into long views across the city and ‘will harm the integrity and balance of city views’ (BWR Masterplan). As we have mentioned, the Egret ‘off one’ landmarks have a specific purpose in referencing the past industrial history of BWR and to provide river markers and do not represent a new townscape character on the river plain.

Views from multiple highly significant heritage assets including Royal Victoria Park and the Georgian Upper Town will also be harmed by the intrusion of these buildings within the view. Given that cumulative harm to the WHS has already been identified in past developments now constructed, this scheme would further contribute to and exacerbate this harm.

The site sits on the boundary line of the conservation area and therefore regard should be given to the setting of the conservation area and the associated impact this scheme would have on the character and appearance of that area.

**Materials and Design**

The Trust is usually supportive of high quality contemporary architecture but we question though whether this design sit well within and adequately reference the specific local context including reinforcing local distinctiveness. In our view a simpler and bolder set of building forms would be more appropriate, referencing the warehouse aesthetic found along the river.

In particular we have concerns regarding the use of uncharacteristic grey and buff brick; these do not form part of the Bath palette. The use of Bath stone with grey cladding and bronze detailing would be far more appropriate and respectful to context. If the scheme is agreed in some form we would request that the use of pre-patinated bronze is conditioned so that this interesting material cannot be varied out of the scheme at build stage (as happened with the proposed ceramic roofscape at Alison Brooks Buildings, BWR).

**Sustainable Transport Route**

The documentation does not appear to be very specific regarding the opening of old railway bridge and how this will be achieved. It does not appear to be in the demise of the site and whilst the D & A talks of the benefits of opening up this bridge for pedestrians/cyclists, it is not clear who is responsible for the works. We assume this would be part of the S106 agreement for the site. That said, we question whether all options for a mass transit route through this site and on into Newbridge (where the old Midland Line train route still exists as an extended ribbon of open land) have been examined and dismissed and whether the Planning Authority is happy to accept that development of this site would in effect completely destroy any future possibility of the use of the land for a transport link, including any Joint West of England Transport Plans.

**Conclusion**

In summary, the proposal is contrary to many of B&NES own policy objectives and design codes. The B&NES Local plan is well thought through in order to achieve a balance between economic development and heritage protection and this scheme, if permitted, would cut a swathe through both of those appropriate ambitions. The proposed scheme, by virtue of height, bulk, design and appearance harms the setting and views of multiple designated heritage assets. This development would neither preserve nor enhance the character and appearance of the adjacent conservation area, and would fail to respect or enhance the distinctiveness of the local townscape. We believe that the special qualities of the World Heritage Site would be compromised by such development. The scheme would be contrary to the Planning (Listed Building and Conservation Areas) Act 1990, Section 12 (Conserving and enhancing the historic environment) of the National Planning Policy Framework (NPPF), policies; B1, B4, B5 and CP6 of the B&NES Core Strategy and policies CP6, D1, D.2, HE1, B4, BD1 of the Placemaking Plan.  It is also contrary to the provisions of the Bath Western Riverside SPD. **We therefore strongly recommend that the application be refused.**