

## 15/01932/EOUT - Proposed Development Site Roseberry Road Twerton Bath

*Mixed-use regeneration comprising the erection of six buildings to accommodate up to 200 flats, flexible business employment floor space (Use Class B1) (up to 6,000 sq m gross), local needs shopping (up to 1,350 sq m gross) together with all associated development including demolition of existing buildings, site remediation, construction of new access roads and riverside walkway/cycle path, landscaping and tree planting*

Objection: The Trust appreciates the collaborative approach of the applicants which has resulted in welcome amendments to the application, however we continue to object to the proposed development on the basis of roof design, appearance, bulk, massing and height of some of the proposed buildings. In our submission of 21 May 2015 we objected to:

- The bulk and mass of the employment buildings
- The height and upper storey design of the nodal building
- In general the reliance on step back roofs
- Blank and hostile street frontages

We note that some welcome changes have been made to the application, namely:

- The reduction in height of the nodal building (building 1) and the change in roof articulation
- The addition of saw tooth roofing to provide some roofscape variety to Building 1.
- The addition of a curvilinear element to the employment buildings
- The addition of more active frontages

However we are still concerned about:

- the overall impact and precedent of very large, bulky, tall, 'boxy' (or 'box-like) buildings on the townscape in this sensitive riverside location with the World Heritage city. Specifically we still have concerns about the mass, scale and height of buildings 1,4, 5, 6.
- Due to their bulk the proposed buildings still largely fail to respond to the character and architectural grain of the surrounding area. They would incongruously and very visibly dominate the local area which is characterised by visually homogenous small scale domestic or industrial architecture of various periods.
- In particular we note that the proposal still includes the step back roof form which is an unwelcome design precedent and we strongly suggest that further thought should be given to more variety in the roofscape design. The local patterns of gable and hip roof forms and dormer windows should be reflected more in this development. We continue to urge the applicants to reconsider the set back roof design to the upper storeys of Buildings 1, 2, 4 and 5. Whilst some of the height of the employment buildings has been reduced, it appears that actually the set back roof of the far west building may be one storey higher.

We do not believe the dominant design elements of the Western Riverside scheme should be used as a blueprint for other riverside areas. The overall bulk, massing and heights of the WR development could be suggested to detrimentally overwhelm and dominate the townscape in this central and very visible riverside location in the World Heritage site. At this stage we believe the same outcome could be true of the proposed Roseberry Place development. We believe developments in this location should seek to blend in with, complement and enhance the local urban grain, not stand out strikingly from it.

To illustrate our point, the Trust cites the example set by the Twerton Mills development which has impressed the Trust. The high quality modern design, creative plan form and refreshingly varied and interesting roof treatments of this development which sits very comfortably within its local context (indeed enhancing it) but is still contemporary and satisfies the overriding need for high density units.

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 conservation area, would fail to enhance the local distinctiveness of the townscape and would be detrimental to the visual amenity of the location. 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 and CP6 of the B&NES Core Strategy and saved policies; D2, D4 and BH2 B&NES Local Plan. We would therefore recommend that the application be refused.