

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

Mixed-use regeneration comprising the erection of six buildings to accommodate up to 200 flats, flexible business employment floorspace (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.

Object: The Trust notes from the submitted Report of Community Involvement that our views on the pre-application consultation have been noted. However we continue to object to the scheme on the basis of our initial reservations which have not been addressed, in particular our concerns about the bulk, massing, height and layout of the proposed buildings, poor connection with the riverside and failure to reflect and harmonise with the pattern and grain of the local area, or present a street frontage which respects Bath's coherent townscape character. We are also concerned about the selection of materials and the proposed colour palette of the scheme, in particular the use of red bricks which, whilst connecting the area to its industrial past, could be visually incongruous and jarring in buildings of this size.

Principle of development

We welcome the principle of the scheme as an opportunity to develop the site at a key intersection and gateway to the wider city. The 30% of affordable housing, dependent on density, and the higher proportion smaller 1-2 bed dwellings represents a much needed type and form which we support. The fact that student accommodation is not intended for the site is welcomed, as we are aware that there is not sufficient projected demand and that this form of development is detrimental to the opportunity for building affordable housing.

Employment buildings

We consider that the mass and bulk of the employment buildings is too great. We recommend a design review of this building.

The nodal building

The 7-8 storey height of the nodal building is inappropriate for this site and Roseberry Place as a whole. The Trust has an 'in principle' objection to development at this height. We are aware that the use of modifiers to the recommended height for this zone, as per the B&NES Building Heights Strategy (2010), is at the discretion of the local planning authority, but is also subject to justification. Development of the site immediately to the north of the Roseberry Place site may lead to demand for another building of similar height in order to create visual symmetry. Furthermore the site at the corner of Windsor Bridge is an existing and natural nodal point. Other taller than average 'landmark' buildings have been approved, and justified, specifically in order to provide river/bridge-side markers but not for other marking points. A potential 'cluster' of taller buildings here could be harmful to the visual amenity of the area and views to, from and through the location situated in the World Heritage Site and could create an unwelcome

precedent. We refer to paragraphs 2.9.10 - 2.9.15 of the Bath Western Riverside SPD (2008) for guidance on proportion, landmarks and building heights.

BPT has strong reservations about upper storey design and the set-back roof which is a disappointing design response that is becoming prevalent in developments in the western riverside area. We would urge the applicants to re-consider the design of some of the upper storeys, particularly of the nodal building with a view to presenting a more suitable design which breaks with the set-back form.

The plinth of 'floor zero' of building 1, facing Windsor Bridge Road is proposed to be blank. Whilst this contributes to the excessive height, it also presents an unattractive and hostile frontage to the street scene.

Consultation feedback

At pre-application stage we expressed concerns about the bulk and massing of the employment use buildings, the height and location of the nodal building as well as the design of upper storeys (in particular the set-back roofs) and we do not feel these concerns have been addressed in the proposed scheme. We note that in general a high proportion of the consultees were concerned about the 'overall height scale and mass of the proposed development' and similarly that 'some' of the 9 consultees felt the buildings 'would not be aesthetically pleasing nor in keeping with the area in Bath'. The applicants responses to consultation appears to have examined the issue of building heights, scale and massing and concluded that in general the proposals meet with council policy. We strongly disagree and feel that the applicants have not shown the appropriate level of consideration to the concerns of the respondents.

Conclusion

We strongly object to the proposal and assert that the proposed scheme continues to present unacceptable development, specifically: the bulk and massing of the employment building is too great, the height and proposed location of the nodal building is inappropriate and in particular that the development will negatively affect the views to this area within the World Heritage Site, intrude on the visual homogeneity of the urban grain in this area and set an unwelcome precedent in this sensitive location.

The proposed scheme, by virtue of height, bulk, design, appearance, harms the setting of setting and views of multiple designated heritage assets, this development would neither preserve nor and enhance the setting of the conservation area, would fail to enhance 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.