



BATH PRESERVATION TRUST

20/00259/FUL

Homebase Ltd, Pines Way, Westmoreland

Redevelopment of the site to provide a new care community (use class C2) comprising care residences and care suites and ancillary communal, care and wellbeing facilities, office space (use class B1), children's nursery (use class D1) together with associated back of house and service areas, pedestrian and vehicular access, car and cycle parking, landscaping, private amenity space and public open space

The proposed area of development is located on the existing Homebase site, within the Bath World Heritage site and overlooking the boundary of the Bath conservation area. It is additionally located alongside the River Avon within the Green Infrastructure Network associated with the Avon's ecological significance and local landscape character. Furthermore, the site is directly adjacent to numerous designated heritage assets including the Grade II* Georgian Norfolk Crescent and associated curtilage landscaping, Grade II* Cumberland House, Grade II Norfolk Buildings, and Grade II 7-27 Victoria Buildings. Whilst the Western Riverside area largely contributes a commercial and light-industrial functionality and aesthetic, the area retains a strong residential character reflected in the presence of 2-4 storey historic terraces, as well as some examples of contemporary additions such as Albert Crescent.

BPT has been engaged in the development of proposals at preapplication stage. We feel that the proposed layout of the site has improved, with a resulting increase in the site's permeability and connection with the existing area. We are supportive of well-connected developments that both contribute to and utilise the existing plan form of an area, and avoid the isolation of the proposal from its surrounding urban context.

However, the Trust is unable to support the current iteration of this application for the following reasons regarding the proposal's use, design, height, use of materials, and relationship with the surrounding townscape and its contextual setting:

Appearance:

BPT maintains that new development should positively contribute to or enhance existing local distinctiveness and townscape character. However, we do not feel that the proposed design of all the buildings encompassed within the Masterplan enhances the local distinctiveness of the existing Western Riverside character. The prevailing, proposed use of buff-coloured brick on all elevations of Blocks A, B, C, and D is not appropriate within an area of predominantly Bath stone ashlar and Bath rubble stone. Whilst there are some limited examples of historic red-brick buildings along the river such as the Bayer Building, these are located to the far west of the proposed development site, and therefore do not factor into its immediate architectural and material context.

Whilst we appreciate the D&A Statement's intended use of materials to reflect the area's "industrial character", this unfortunately does not suitably enhance the extant material appearance and associated character of the site's immediate context. Large-scale contemporary developments within the vicinity, such as Bath Riverside and Albert Crescent, have maintained a consistent usage of Bath stone ashlar, enforcing the riverside's established distinctive appearance in relation to the wider material homogeneity of the Bath World Heritage site and the setting of the conservation area. Therefore, considering the prominent scale and positioning of the development, and its high levels of visibility from outside the site from Stothert Avenue, Victoria Bridge Road, Pinesway, and over the River Avon from Norfolk Crescent, we feel that the proposed use of brick on significant elevations is excessive and does not visually connect with its landscape; this risks resulting in an isolated architectural style at odds with its townscape setting.

We similarly feel that the use of PPC aluminium cladding on building elevations, particularly on Block C, is not visually well-suited to the Pinesway or Stothert Avenue streetscape which is set back from the riverside, and ultimately does not suitably reflect the residential vernacular character of Lower Bristol Road.

We have some concerns regarding the articulation of the roofline. The proposed height and size of the 'mansard' roof extension is top heavy in design, and does not accord with traditional roof vernacular in Bath. The additional volume of rooftop glazing further emphasises the development's unsuitability within its historic environment; the volume and height of light spill from the external elevations of the site will be directly harmful to the low-light level character and evening atmosphere of the Bath World Heritage site and the boundary of the conservation area.

We therefore cannot support the design in its current form, and would recommend that a more sensitive rooftop articulation is considered to mitigate potential future harm to the World Heritage site and indicative townscape setting of the conservation area.

Townscape, Views and Landscape Setting:

We are largely concerned regarding the development's lack of a material or architectural relationship with its setting and Bath's wider landscape character. In particular, the proposed height across the development at 6 storeys will over-dominate a streetscape of largely 2-4 storey buildings. Whilst we appreciate that some areas of the scheme are limited to four storeys around Blocks A and C, the proposed sections show that Block A remains half a storey higher than the adjacent Albert Crescent due to the height of the mansard roof extension. In conjunction with the provided visuals, we can conclude that this development is excessive in its scale and would establish an unacceptable increase in roof height within both its immediate and wider streetscape.

The Trust would further resist the proposed height of the development due to the potential visual detriment to Bath's wider landscape, and harm to the setting of Grade II* heritage assets including Norfolk Crescent and Cumberland House. The proposed scale and density of the development will result in the 'closing in' of Norfolk Crescent's immediate setting, and the intrusion of urban elements into an area that has otherwise positively retained a green, verdant atmosphere and appearance. The development will also factor into wider views of Bath's landscape character and setting visible from highly significant and historic viewpoints such as Bathwick Fields and Sham Castle, and will represent a discordant encroachment of incongruous materials and colours into a landscape purposely designed "to achieve picturesque views and forms (Bath Management Plan 2016-2022)".

We would therefore strongly advise a reduction in height, particularly regarding the addition of the ‘mansard’ roof extension which remains top-heavy in appearance. The Trust would additionally recommend the reduction of rooftop glazing to better follow Georgian principles of window articulation whilst reducing the impact of light spill on the low-light townscape and landscape setting.

Affordable and Key Worker Housing:

In principle, BPT is opposed to the development of schemes with a single residential usage. We find this to be contrary to Section 8 of the NPPF, in which mixed-use developments are associated with “healthy and safe communities”, and Policies D1, D3, and CP10 of the Core Strategy and Placemaking Plan. New housing developments must accommodate for a range of different household types and people to provide a greater choice of housing type, and to create balanced, diverse, and sustainable communities.

We additionally find the lack of affordable or key worker housing provisions unacceptable in relation to the scale of the proposed scheme. The Core Strategy and Placemaking Plan identifies a significant shortage in affordable accommodation; we would instead emphasise the residential suitability of the site for key workers and young professionals considering the close proximity of commercial and light industrial premises and the RUH in the area, and the economic opportunities of the care and commercial facilities offered by the Homebase site itself.

We would therefore strongly recommend that the potential for the inclusion of key worker and affordable housing is considered as part of the proposal before any aspects of the scheme are approved.

Landscaping:

We are disappointed that this application has not fully embraced the opportunity to better integrate the riverside setting into the landscaping and design strategy. Whilst the LD&A Statement emphasises that “wildlife corridors around and across the site shall be improved”, there does not appear to be any definitive planting or landscaping strategies focused on planting or rewilding along the riverbank that would strengthen the River Avon’s ecological value as a wildlife corridor through Bath. Whilst we appreciate that the riverside is outside of the proposal’s boundary, there is a significant opportunity for collaboration to improve the green infrastructure and accessibility of the River Avon footpath that we do not feel has been sufficiently explored in accordance with Policies NE2 and CP7 of the Core Strategy and Placemaking Plan.

Conclusion:

BPT asserts that whilst we appreciate the potential of the site for regeneration and positive redevelopment that can benefit Bath, we feel that the proposed design fails to reinforce local distinctiveness, neither preserves nor enhances the character of the Bath conservation area, and would harm views into and across the World Heritage Site and conservation area by virtue of its discordant use of materials, and lack of meritorious aesthetic connection with the historic environment. The Trust maintains that due to the incorporation of materials such as brick and aluminium cladding, this scheme does not suitably reflect, respect, or contribute to distinctive architectural aspects of local character, and consequently does not relate to or participate in its residential setting. We additionally resist the principle of single-use development, and would ask that the exclusion of key worker and affordable housing is reconsidered and integrated as part of a more sustainable and balanced scheme. This application is therefore contrary to Section 8,

12, and 16 of the NPPF, and Policies B1, B4, BD1, CP6, D1, D2, D3, D4, HE1, NE2, CP7, and CP10 of the Core Strategy and Placemaking Plan, and should be refused.