**14/02272/EFUL Ministry Of Defence, Warminster Road, Bathwick, Bath, Bath And North East Somerset, BA2 6SF**

Demolition of existing buildings and erection of 189 no. dwellings; 2 no. accesses from Warminster Road, vehicular parking; open space; landscaping (including tree removal); pumping station; and associated engineering works.

**OBJECTION**

Dear Sirs,

Further to our preliminary comments submitted to raise awareness of our concerns, we now submit the following more detailed response which augments our previous letter.

On the whole we applaud the will to produce a relatively lively mix of traditional buildings and the care given to resolving challenging topographical issues.

**General comments;**

* The redevelopment of the site to provide housing is supported.
* In principle we welcome the type of housing and character areas, and have no objection to a well detailed classical approach.
* We particularly welcome how there has been no distinction between affordable and open market housing, in terms of design detailing, when we are so used to seeing design stripped down when it comes to affordable housing.
* On the whole the proposed layout appears sensitive to views across the valley. However, view montage 1 is worrying. Not only would the bulk of the buildings along the pavement impair the existing views across the valley, but their relationship with road is extremely uncomfortable and lacking local precedent.
* We are concerned that the height of buildings is one storey taller than identified in the Concept statement for the site, which states a preference for a ‘maximum of two storey dwellings, with taller buildings concentrated in a setback location on the lower slopes of the site’.
* Additional verified views would be helpful. For such a large development there should be more than three viewpoints included the montages.
* We would welcome a mix of uses, at least the inclusion of a shop, within a development of this size. With two schools in the immediate vicinity as well as the development itself we cannot believe that a convenience store would not be used.
* We welcome the intention "to achieve CfSH Level 4" over the whole site (Sustainability Statement para.2.18) but regret that the 10% of higher levels envisaged in the Concept Statement (together with the commitment to some self-build plots) appears not to have been addressed. We are also somewhat surprised to see 'N/A' against para 2.3 Renewables (and elsewhere) in Sustainable Construction Checklist.
* Detailed comments about design are set out below.

**Design approach**

The character of this part of the city is marked by the transition from terraces to villas during the mid 19th century. Developments of townhouse terraces in this area of Bath had largely ceased by the 1830’s, and in the Warminster Road direction ended at Sydney Gardens (with the exception of simple artisan’s houses at Hampton Row). We therefore have reservations about the appropriateness of the architectural approach to terraces, and blocks which have symmetrical facades with pediments, resembling the frontages more usual in the 18th Century areas of the grander Georgian terraces of the City centre and the upper town.

The proposals refer to villas. However, we feel that these buildings are not in the Bathwick villa style, which is defined by detached or semi-detached dwellings that show a mixture of symmetrical and asymmetrical facades, with varied rooflines both on individual buildings and in vistas within the landscape and are not large “palace fronted” blocks or terraces. There are some late 18th century and early 19th century villas on Bathampton Lane, but these would have taken advantage of a countryside setting on the outskirts of Bathampton village, rather than a higher density city edge. These houses have parapets but not pediments.

In particular, this approach to the design of the buildings sited where the site closely abuts Warminster Road give rise to a very curious street frontage due to the significant difference in levels between the road and the ground floor of the building. We cannot think of an example where a pediment tops a façade at street level (or only slightly ‘above normal eye level’). Indeed, in the local area, the larger villas (but still considerably narrower than proposed) are set side-on to the road or well behind vegetation. In much new classical architecture the use of pediments is an overly grand indication of classicism.

It is disappointing that the Italianate Bathwick Villa style character of the area does not appear to have been fully explored or considered by the development. A more locally represntative villa design would substantially reduce the bulk of lines of built form that will be seen from across the valley (as seen in montages from Camden Road).

**Design Detailing**

Examples of questionable detailing as referred to in our preliminary comments are described below. Our concerns generally relate to composition/elevation treatment, fenestration, entablature, chimneys, and the position of down pipes. When drawings are presented at this scale it can be difficult to judge detailed articulation and we would welcome larger scale drawings.

On the whole the approach to fenestration and the lack of sash windows with glazing bars is very disappointing given the ‘classical’ approach. Here we believe there is room for improvement. Sash windows would correspond better to the classical proportions than many of the currently proposed windows do. The proposed mullion and transom windows appear rather squat – we assume this is because off the peg windows are being used and produce these dimensions, and presumably so do floor heights in the mid levels of housing types like N9 and N11.

**Flats 3 plot 111** – The south elevation window arrangement with a central tripartite window could be a good focus of this elevation. However this window lacks such focal emphasis because the two small windows appear awkwardly slotted into the tripartite feature.

**N13 Plot Numbers: 141, 142 & 143 -** The rear elevation is shown as render, stating it is not facing public realm. This is however, the main elevation that will be seen from the public landscaped areas and from the canal (as seen in montages viewpoint 4 winter). While it is not built public realm it is open space with views to the new buildings and therefore still highly visible. As this crescent type block appears as a feature building and could be classed therefore as double fronted we would recommend the use of Bath stone on both elevations..

**House Type N7 –** It is unfortunate to seedownpipes placed at the centre of pilasters as this creates an awkward division of the pilaster form.Elevations e, d, c, - Ground floor garage arrangement has strange relationship to the pilaster/bay arrangements above that makes what should be an impressive elevation (in the giant order/Royal Crescent style) look slightly awkward.

**House Type N9 & N9** – Concerns about the design approach, bulk and pediment detailing as described above.

**House Type N11 & N11** - Concerns about the design approach, bulk and pediment detailing as described above. North elevations rendered and yet they face public realm in the development. Getting fenestration/proportions right on this size elevation is vital and this is clearly where the dimensions of the windows have little relationship with the proportions of the elevation. For a design emulating or taking the Bath townhouse facade as its inspiration, the development has rather mean windows. The wall to window (solid to void) relationship makes this building look more institutional than townhouse-type.

**House Type W3 –** On the front elevation the proportions and fenestration do not follow any order and the window size and pattern is irregular. The windows in the side elevation are small and out of scale.

Overall we question[s] shallowness in pitch of some roofs, e.g. blocks of flats c.f. 'villa'-terraces shown on street elevation 1.

**Materials and finishes**

* The use of natural sawn Bath stone is preferred on all elevations and chimneys, given that the orientation of buildings would result in most facades being visible from some part of the public realm or in long views. If render is used we would suggest that it is lime render with stone quoins as this then allows for a natural relationship between stone and render facades.
* Aside from fact that the chimneys have no function why are they not classed as public realm facing and therefore in stone? Especially when they are on same elevations as those that will be in stone and therefore classed as public realm facing. There would be obvious maintenance problems with painted render chimneys. The material for chimney pots should also be stipulated – we would oppose the use of plastic or glass reinforced plastic, which have been used on neoclassical builds elsewhere in Bath (Bathwick Street).
* Painted metal railings, bin stores and windows – colours should be stipulated.

**Lacunae**

* Further information is required on landscaping of 'canal-side' & eastern open space (including playable spaces & community growing plots), on the new bridge over canal & railway, & on footpath connection to Darlington Rd (all as outlined in the Council's site concept statement).

**Planning Policy Context**

The proposed development, by virtue of its inappropriate design, appearance and failure to respond to the local context, would neither preserve nor enhance the city of Bath Conservation area and would compromise the special qualities of the World Heritage Site. Therefore it is in our view contrary to the NPPF, the Planning (Listed Building and Conservation Areas) Act 1990, a Policies BH.1, BH6 and D4 of the B&NES Local Plan.

 For the reasons stated above the Trust is unable to support the proposal in its current form. We would welcome improved justification for the design approach, and would welcome the opportunity to engage in any further design review.

BATH PRESERVATION TRUST