**20/00023/FUL**

**Plumb Center Locksbrook Road Newbridge**

The demolition of the former Plumb Centre and Genesis Lifestyle Centre and the erection of a 3 storey (plus mezzanine) mixed use building for 1354m2 of B1c Light Industrial, 364m2 of D2 Assembly and Leisure, 61 student studios and 42 student ensuite rooms in cluster flats (Resubmission).

*Object*

The proposed site of development is currently occupied by the Plumb Centre and Genesis Gym within the Bath conservation area and World Heritage site. Whilst characterised by the presence of light industrial buildings along the riverside, the Plumb Centre site is set back within a primarily residential area of Victorian terraces along Locksbrook Road and Clarence Place, although the east of the site is largely made up of 20th century low-quality industrial buildings. The site is adjacent to the Grade II Herman Miller factory, now Locksbrook Campus, and therefore contributes to the setting of a listed building.

BPT could not support an earlier submission of this scheme (see application 18/05047/FUL); following consideration of this scheme, we conclude that it remains the same as its antecedent. Therefore, concerns are maintained for the following reasons:

The Trust maintains in-principle resistance to the development of purpose-built student accommodation. Whilst we are supportive of the provision of a mixed-use site through the incorporation of gym and light industrial units, there is no demonstrated need for additional high-end PBSAs as suggested in BATHNES’ Local Plan Options. We would instead emphasise the residential suitability of the site for key workers and young professionals due to its close proximity to local businesses and the RUH, and contribute to the shortage of affordable housing within Bath as noted in the Local Plan. Whilst the D&A Statement briefly makes reference to an increase in key worker housing, this is unfortunately not elaborated throughout the rest of this application.

The Trust is supportive of the removal of the single gabled storey to the rear of the building. However, we feel that the proposed building is over-dominant in its form and height, and establishes a drastically increased roofline within an area of comparatively low-profile buildings. Following the removal of the single-storey Plumb Centre, this would represent a significant aesthetic and architectural change within the Locksbrook character area, an area of largely residential, two-storey dwellings.

Furthermore, we maintain that the height presented in the proposed sections have an overbearing impact on the Grade II Herman Miller factory, and would therefore harm the setting of the building through a combination of its excessive comparative size, and jarring use of dark colours. Whilst the colour of the external materials may be appropriate, we feel that in conjunction with the proposed building’s size and distinctive design, this would further compound a discordant appearance with the area, and lack of connection with the terraced residential context set back from the riverside. The Herman Miller factory’s low, flat profile would therefore be thrown into sharp contrast by the proposed building with consequent harm to the open setting of a listed building, street scene and Locksbrook character area.

BPT therefore encourages a lower height, further set back from the roadside, or a more neutral colour and material palette as a means to reduce the visual impact.

We additionally ask for some clarification regarding the implementation of PV panels as part of the scheme; whilst panels are presented in the proposed roof plan, they do not appear in the 3D visualisations. It would be beneficial for further details of the appearance and positioning of the panels to be specified.

Therefore, whilst we appreciate the architecturally innovative approach presented in this scheme, the Trust cannot support the proposal in its current form. We object in principle to the proposed purpose-built student accommodation, and maintain that the overbearing height of the building would have a detrimental impact on the Locksbrook portion of the Bath conservation area, and the setting of a Grade II listed building.

The proposed height and scale of the building, incorporated with proposed materials and colour, would neither preserve nor enhance the appearance and associated character of the Bath conservation area and would directly harm the setting and significance of the Herman Miller factory. This application is therefore contrary to the Planning (Listed Buildings and Conservation Areas Act) 1990, Section 16 of the NPPF, and Policies B1, BD1, CP6, D1, D2, D3, D5, and HE1 of the Core Strategy and Placemaking Plan, and should be refused or withdrawn and reconsidered.