**Bath Quays North**

**20/04965/ERES**

Approval of Reserved Matters for Plots 1-5 (Access, Appearance, Landscaping, Layout and Scale) of development permitted by 20/02787/VAR (Variation of Condition 42, approved drawings, development specification and design codes of application ref. 18/00058/EREG03 Outline planning application for comprehensive mixed-use redevelopment, comprising B1, C1, C3, A1, A3, A4, D1 and D2 uses, with total combined floorspace of up to 38,000sqm (GIA above ground), infrastructure (including basement car park) and associated development, including demolition of existing multi-storey car park and amenity building)

**COMMENT**

BPT has previously been involved in pre and post application advice (2018 - 2020) As this application is a reserved matters application for the previously approved outline planning applications we are repeating those comments we have made previously in response to general approach which remain applicable, as well as responding to the detailed elements of the proposal.

BPT has previously commented on approved applications 18/00058/EREG03 and 20/02787/VAR for outline planning permission.

**General Comments**

BPT commends the approach to stakeholder engagement and the openness and receptiveness of the team responsible for taking the project forward. We have had considerable involvement in stakeholder meetings and the team have attended a number of meetings with our Planning and Conservation Team and Architecture, Planning and Place Committee. We recognise that there has been considerable contextual analysis at a depth appropriate for a site of such significance.

This historic ‘Broad Quay’ development site is located within the Bath City-Wide Conservation Area and the City of Bath World Heritage Site. Development will have an impact on these heritage assets and the setting of many listed buildings and locally important buildings, the river frontage and views across Bath from the surrounding hillsides.

We recognise that the redevelopment of the Avon Street site brings potential for significant public benefits, both economic and physical. In particular, at the local context high quality development would repair a fragmented townscape and re-connect it to the city, create new homes and public realm, employment and leisure opportunities.

BPT therefore supports the strategic ambition and aspiration to regenerate and repair this city centre site within the Enterprise Area, with new development to create a mixed-use riverside quarter. This site, like no other, offers a new city environment connected to the riverside, and a re-connection of the river and street pattern to the Georgian city.

A site-specific response, a vibrant public realm and a high-quality townscape which reflects and complements the historic character of the locality and sustains and enhances the Outstanding Universal Value of the World Heritage Site is encouraged.

**Previous advice from BPT, which remains relevant to this application, has generally placed an emphasis on**:

* Consideration of the impact on views across the World Heritage Site, landscape setting, and setting of heritage assets, and views from surrounding hill sides.
* Heights 5 of storeys or lower.
* The careful articulation and variation in roof profiles – including the 5th elevation that is looked down upon.
* The robustness and integrity of roof design and associated landscaping.
* Integrated roofscape design.
* Architecture, materials and public realm that complements historic character.
* Considered approach to bulk and massing, especially of upper storeys.
* Variety in materials.
* Considered approach to corners.
* Restoring or maintaining the historic N-S street routes and re-establishing the E-W ‘Back Street’.
* Integrated sustainability – e.g. designed-in solar PV.
* Ground floor active frontages on the riverside and Back Street.
* Strong support for cycle hub.
* Pattern Book principles in urban design and landscaping.
* Preference for the name to refer to the local history and identity of the site.

**Comments on Reserved Matters**

**Appearance**

This riverside site was historically idiosyncratic, having a different character when compared to the classical formality of Bath. When it was Broad Quay, it was an open area surrounded on three sides by a mix of 17th and 18th century buildings, plus the 19th century industrial ones.

Therefore, we feel that this location provides an opportunity for development on this site to be different while complementing the homogeneity of tone and palette of the wider city.

BPT has maintained that the design should be about a contemporary interpretation of the 18th century city. It does not need to reflect it literally.

Regrettably, we have found the elevational treatments proposed to be underwhelming and we are concerned that many elevations lack local distinctiveness, specifically the internal elevations of Back Street (Block 4 and 5). We wonder if assessed against the emerging changes to the NPPF, whether this development would meet local standards for beautiful high-quality design?

The horizontal emphasis which remains a dominant across many facades is a further major concern. We welcome greater verticality (particularly in block 5, which we feel should be more like block 2). More ‘ups and downs’ would be visually interesting and would relate better to the development on the south side of the river.

We recognise that effort has been made to heighten the ground floor windows to give a stronger sense of order to the facades. However, the upper levels maintain the same floor to ceiling levels. This results in the fenestration being closer to a square rather than a rectangle (golden section).

**Corners**

We are pleased to see that more is being made of the ‘special corner’ on Ambury. Also, that the curve extends higher than just ground floor level. However, we regret that the corner is underwhelming, and opportunity has been missed for any sculptural or public art feature. It could be more architecturally interesting.

**Roofscape**

We generally support the ambition of the roof garden. The proposed ‘variety’ in roof form is felt to be more honest than the use of a mock mansard profile. We generally encourage contemporary, 21st century design rather than faux-historic roof profiles, especially fake mansards.

However, the roofscape must have solid integration with the building design. Even if it is a flat roof, a change in material is needed to provide harmonious visual distinction. There needs to be much greater coherence between the ‘activated’ or ‘living’ roofscape and elevations.

It is absolutely essential that the green landscaping (balanced with solar PV) is locked into the design, and well managed, and not able to be value engineered out leaving Bath with a collection of plain flat roofs. We have serious concerns about the ongoing maintenance and management of roof top landscaping and we can only support this approach only if there are appropriate landscape management plans tied into any planning consent.

We are pleased to see the inclusion of integrated solar. We will be urging the LPA to Condition this and to compliance-check any consented provision. However, we would not wish to see the solar provision cramp the landscaping provision and they must be designed together in order to ensure appropriate space for each.

We retain some concerns about the over-cluttering of the roof, and how this would be viewed from the pavement.

We remain concerned about high level light spill from rooftop activity especially during winter. Given that the green roof may attract insect and foraging wildlife, very low light levels will need to be achieved and maintained at night time to support this.

**Materials**

The tone of brick suggested appears to be very red, and it is not clear if this is all confined to Back Street.

The use of red brick should be resolved early in the application process and sample panels should be built or submitted, to show the exact type of brick, texture, colour and mortar mix. Perhaps brown/terracotta brick would be a more appropriate tonal reference in the palette of Bath.

We wonder if an opportunity for living walls, specifically on secondary elevations, is being missed.

Concrete is recognised as a flexible, durable and potentially low carbon material, but generally has no place in the Bath street scene unless very carefully conceived as a positive material within a high-quality contemporary design.

Given the amount of precast concrete that will feature on the most visible parts of the building, especially close-up, very careful consideration needs to be given not only to the construction but also the detailing. It is critical that precise detail is given regarding the colour, aggregate, texture and finish. There needs to be clarity as to how the concrete will weather, or be protected, long term.

Precise details of the for the (usually cylindrical) plant enclosures on roofs are are required as the material is unclear. Elevations specify ‘terracotta colour’ and this is far too vague. From the distant views these enclosures actually become one of the more significant features (especially where there is little roof-top planting), so it is important to know what the material is, what texture it has, how it might reflect light, and how it will weather in time. Given their prominence they must be a recessive colour with a matt finish.

We have concerns about the specified ‘white metal glazing system'. We suggest that this might be be better contrasting with the light pre-cast concrete and stone areas adjacent. The decision on precise British standard colour and also finish (matt or shiny or?) must be made in coordination with the materials of the wall within which they sit.  This is as important decision as the colour and type of mortar joint in a brick wall.

Also, what are the chances of this white material staying clean high up above Corn Street?

Without full details of these materials, as described above, we will have great concern, and will remain to be convinced that the appearance of the development would meet the requirements of Core Strategy Policies CP6, D1, D2, D5, and HE1, and Policies B1, B4, and SB4 of the Placemaking Plan.

**Scale**

We maintain concern that any buildings above 5 storeys (5 storeys plus set back and plant) would be visually prominent and may have adverse impacts on the special qualities of the World Heritage Site, specifically the city in the hollow of the hillsides.

**Comments on Verified Visual Montages**

1. We are concerned that in the visuals the roof seems to have become proportionately much less green.
2. We would like to see visualisations of views out from the new roofscape INTO the city.
3. There appears to be a large area of fenestration on the Corn Street/Ambury corner, we are concerned about light spill.
4. Ambury corner facade looks to have deeper insets in v.7 than v.5/6
5. We regret loss of glimpse of Abbey from bottom of Wellsway (v.8)
6. Enclosures on roof – material unclear (elevations specify ‘terracotta colour’.)
7. There appears to be limited rooftop tree planting – on Plots 1/2 (at level 4 from ground) alone.
8. The view from Alexandra Park/Beechen Cliff(v9) could be said to be an improvement!
9. Long views 10 (Bathwick Fields) & 11 (Sion Hill GC) indicate nothing obtrusive.
10. We would like to see street level/pavement views of roofs. Note 3-levels (Plots 3,4,5) with the highest (non-accessible) are well setback

**Layout**

A street pattern that recreates the historic grain and enables views and routes through to the riverside from the city centre is welcomed.

We have encouraged Back Street to be an active and lively street and welcome public uses along this frontage. The kink in Back Street seen in the earlier plans was successful in the way it revealed Somerset Square (now ‘Yard’ which we agree is a better name) and created a sense of discovery.

We are concerned about the kind of environment Little Somerset Yard will be, the CGI images create little sense of joy, despite the tree, ‘curiosity cabinet’ and sculptural water refill point.

**Landscaping & Public Space**

We welcome this significant opportunity for variety in public realm that is forward looking in terms of sustainability and biodiversity.

The creation of joyful spaces between buildings, and desirable connectivity to the river, are critical to the success of the development.

However, it is not reassuring to see that so much landscape detail appears to be provisional, perhaps with the assumption that it will be agreed by Condition. The ongoing management of the public open spaces, especially the riverside parade and terraces, needs to be agreed between the developer & the Council, and set out as part of this application.

We welcome the ‘play fountain’ in Bridge Place and bespoke water fountain for Little Somerset Yard. We would welcome more water features in landscaping.

We are generally content with the proposed flood resistant landscaping along the riverside, the tree species are good, and pennant or concrete materials are robust. The play logs and ‘picture frame’ are both happy features.

We are generally happy with the planting/hard landscaping detailed elsewhere on site and welcome Little Somerset Yard ‘cabinet’.

We welcome recessed ground level lighting on riverside parade and the avoidance of lighting on riverside terraces.

We wonder whether more space is needed at end of the new bridge – with perhaps small reduction in Bridge Place? However, the design as shown may slow down cycle traffic better.

The following clarification would be welcome:

* Landscape section m-m Ambury would be helpful.
* Gradients/drainage in Lt Somerset Yard.
* Appears to be stepped access only from Corn St to Lt Corn St? (or via hotel entrance).

We remind the Council that public realm proposals must follow the adopted principles set out in the Pattern Book for Bath. There needs to be a place-specific approach that relates to the Pattern Book and has a visual cohesion with other parts of the city. We note that circular bronze cycle stands (as per Pattern Book) are proposed in BQN. These have already been removed, apparently as unfit for purpose, from many places in the city centre, being replaced by an inconsistent mix of unrelated stands. Consequently, we feel that this element needs further thought now, to ensure that a long-lasting and harmonious choice of stands is achieved.

We encourage the animation of place, and would like to see more opportunity for creative responses to landscape design, at for example, the bus stop at Ambury Place and the kiosk. We like the idea of a Bath School of Architecture design competition and encourage this to be brought forward.

Public art needs to be curated for the context. We would like to see a clear place-specific brief for the selection of any artist rather than ‘presenting’ the use of one who has worked elsewhere, and potential with an element of public choice in the final selection.

**Conclusion**

We retain some concerns regarding the appearance of buildings and elevational treatments, and we encourage greater verticality along the riverside.

The execution of detailing and materials will be critical to the success of the scheme, materials must be excellent quality with excellent detailing at planning approval stage if possible, rather than dealt with by Conditions.

At this stage of the planning process we encourage much greater precision with regard to the proposed materials (specifically for concrete, brick, window panels, and roof top enclosures). Including the submission of sample panels.

We have serious concerns about the ongoing maintenance and management of roof top landscaping and we can only support this approach if there are appropriate landscape management plans tied into any planning consent. It is absolutely essential that the roofscape landscaping (balanced with solar PV) is locked into the design, and well managed, and not able to be value engineered out leaving Bath with a collection of plain flat roofs.

Although the roofscape would not integrate with the typical roofscape of the Georgian city it would be inappropriate to create an inauthentic domestic roofscape in this location, especially since this area has been open space or industrial for over 100 years. Therefore, its contrast with the conservation area and World Heritage Site represents at worst, ‘less than substantial’ harm which is outweighed by the public benefit (in environmental, social and economic benefit terms) of the scheme. Our conditional support for this element does however depend on the green roof gardens being well detailed and maintained, and integral to the design with planning conditions securing their future.

We urge the applicants and LPA to address these issues.