**20/00259/FUL**

**Homebase Ltd, Pines Way, Westmoreland, Bath, Bath And North East Somerset, BA2 3ET**

Redevelopment of the site to provide a new care community (Use Class C2) comprising care residences and care suites and ancillary communal, care and well-being facilities, offices in Use Class E(g)(i) 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.

**BPT response to revised plans submitted 9th October**

**Objection**

The proposed 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. The site directly overlooks numerous designated heritage assets including the Grade II\* Georgian Norfolk Crescent and associated curtilage landscaping, Grade II\* Cumberland House, Grade II Norfolk Buildings, Grade II Nelson Place West, 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.

*Appearance:*

The most recent revisions further address the cumulative height of the scheme, in particular the height and massing of Blocks A & B as viewed from the north. We feel that the reduction of the site’s height by approximately 2.3-2.8m through the introduction of a much shallower roof pitch is an improvement. However, due to the overall scale, height, and massing of the site as a whole, and a continued lack of contextually-driven design and material texture, the development would continue to be visually detrimental to its townscape setting and to views into and across the World Heritage Site. The scale, massing, and density of the development as viewed from Stothert Avenue and Pines Way has not been adequately addressed. We again highlight recommendations for development to be restrained to four storeys with an additional mansard storey, as stated within The Bath Building Heights Strategy.

The northern elevation and south-west corner of Blocks A & B have been reduced in height to two storeys, to allow for views out to the hillside from Norfolk Green, and consequently introducing a new “2-storey town-house” style of form and articulation to the scheme. The reduced massing of Block A is proposed to “create a second viewing corridor to open up views from Bath Western Riverside/Stothert Avenue to the green hillsides beyond”; however, this proposed visual improvement is not clearly shown in Viewpoint 8b of the VVMs, and instead would appear to retain a bulky, monolithic presence within the townscape. We therefore recommend that further viewpoints are submitted to better illustrate the degree to which the proposed corridors would, in reality, open up the site’s visual connection with surrounding landscape views.

With regards to the new two-storey design aspect of Blocks A & B, we feel that this is an inappropriate addition to the site which would result in a sharp variation in height which is without precedent within Bath’s public thoroughfares or residential districts. This new two-storey aspect is a lost opportunity for a more interesting design, rather than a scaled-down, ‘roofless’ version of Blocks A & B’s existing elevations. We maintain our resistance to the continued, incongruous use of brick and industrial-inspired design on this site with its lack of contextual referencing.

We highlight the increasing number of developments coming forward with an excessive material emphasis on the use of brick, in particular in schemes situated along Lower Bristol Road. The Trust therefore continues to express the unsuitability of brick in this volume within Bath, in sharp contrast with the homogenous use of Bath stone ashlar and rubble stone which represents a fundamental aspect of the Materials and Substance and Georgian Architecture OUV of the World Heritage Site. Consequently, the proposed principal use of brick in this scheme would result in cumulative harm to the material integrity and harmonious appearance of the World Heritage Site, a visual impact further heightened by a growing concentration of similar residential schemes within Bath with a similar material dependence on brick across primary elevations. We acknowledge there are certain sites in Bath where limited amounts of brick in an appropriate colour and finish may be deemed acceptable, such as buildings that directly front the riverside, but we do not feel this justifies a widespread, exclusive use of brick within the city, independent of townscape context.

The proposed material palette across the site remains consistent with previous iterations of the scheme, and we maintain our in-principle opposition to the excessive use of buff-coloured brick in sharp contrast with the Bath stone ashlar and rubble stone context of the site’s townscape setting. However, there appear to be some discrepancies between the proposed and superseded visual montages with regards to colour, particularly the western view of the proposed avenue between Blocks C & D in which the proposed cladding is of a more bronze tone than previously proposed. We therefore ask that colour selections of cladding and brick are included as part of this application for assessment by the LPA, and changes in colour palette should be incorporated within the summary of revisions.

*Setting of Listed Buildings and the World Heritage Site:*

We retain strong concerns regarding the proposed harm to the setting of multiple Grade II\* heritage assets including Norfolk Crescent and Cumberland House. Whilst amended Viewpoint 5 of the VVM proposes the retention of hillside views from the north of Norfolk Crescent Green, this would still remain severely restricted by the rising bulk of Blocks A & B’s eastern elevation. Norfolk Crescent was originally designed as a “notable edge-of-town development, which combined a major urban-scaled project with an unspoiled rural prospect in the manner of the Royal Crescent” (Historic England Listing 2010). Therefore, part of the terrace’s special architectural and historic interest is derived from its intentional relationship with rural landscape views, and forms part of the 18th century blending of town and countryside “picturesque principles” OUV of the World Heritage Site. Therefore, we maintain that the overall proposed scale and density of the development as amended would continue to 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 appearance and visual relationship with the hillside setting of the World Heritage Site due to the low-profile form of the existing Homebase building.

We also highlight the continued absence of detailed VVMs taken from the Norfolk Green area which are required due to the high concentration of Grade II and Grade II\* buildings in this area. We note that Viewpoint 5 is taken from the external ground floor perspective of Grade II Nelson Place West rather than Norfolk Crescent, to follow the proposed north-east – south-west viewing corridor trajectory. Consequently, conclusions that revisions would benefit Norfolk Crescent and better connect it with its green hillside have not been convincingly evidenced. We strongly recommend that further VVMs are submitted to better account for existing and proposed landscape views across the site from the immediate perspective of Norfolk Crescent.

*Mixed-Use and Affordable Housing:*

We are pleased to see that the revised scheme includes 253 mixed-type residential units alongside 35 care suites, and encourage development to feature a positive mix of housing types. However, the site would retain a single C2 (Residential Institutions) residential usage which would limit the social and age range of potential residents contrary to Section 8 of the NPPF, and Policies D1, D3, and CP10 of the Core Strategy and Placemaking Plan. The Trust therefore queries why a C3 use for the proposed residential units does not appear to have been considered. We continue to find the lack of affordable or key worker housing provisions unacceptable with regard to the scale of the proposed scheme. We highlight the need for affordable accommodation in Bath.

*Conclusion:*

Therefore, due to the maintained overall scale, height, and massing of the development, and the continued visual detriment of the proposed building complex to its contextual townscape and the setting of multiple Grade II and II\* heritage assets, the Trust maintains and reiterates our previous objections to this scheme (see BPT objection to Revisions 06/07/2020).

We remain supportive of the principle of regeneration and development on this site, and encourage the further integration of mixed housing types as a positive aspect of sustainable residential development.

However, we maintain that the revised design fails to reinforce local distinctiveness and neither preserves nor enhances the character of the Bath Conservation Area.

The proposed development would continue to harm views into and across the World Heritage Site and conservation area by virtue of its discordant use of materials, and lack of aesthetic connection with the historic environment.

Despite reductions in height, particularly in Blocks A & B, the development as a whole remains visually excessive and over-dominant in height, scale, and massing.

Despite claiming the integration of a viewing corridor, the excessive hemming in of landscape views from Norfolk Crescent Green would harm the special architectural and historic interest of a Grade II\* listed terrace and the landscape setting of multiple Grade II listed buildings.

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 the distinctive architectural aspects of local character and consequently does not relate to or participate in its residential setting.

We continue to recommend the reconsideration of the blanket C2 use of the site and the absence of affordable housing to create a more sustainable and balanced scheme.

This application is therefore contrary to the Planning (Listed Buildings and Conservation Areas) Act 1990, 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 or withdrawn.