

**21/02354/FUL**

**Jubilee Centre Lower Bristol Road Twerton Bath Bath And North East Somerset BA2 9ES**

Demolition of existing building; mixed-use redevelopment of site for storage and distribution (Class B8) and 120 units of purpose-built student accommodation (sui generis); and associated access and landscaping works (re-submission)

*Objection*

The Hollis Building is an unlisted 20th century industrial building situated along Lower Bristol Road, within the Bath conservation area and World Heritage site. The site sits adjacent to Rackfield Place, a terrace of Grade II early Victorian artisans’ cottages in coursed rubble stone, which appears to be a rare example of early back-to-backs in Bath. The site additionally lies opposite the Grade II 1840 Twerton Viaduct, and consequently forms a significant part of the Viaduct’s riverside view and streetscape setting.

BPT has objected to past iterations of this scheme which proposed purpose-built student accommodation (see application 17/05536/FUL). We most recently objected to application 20/01794/FUL for the construction of 121 student units on the site on grounds of an in-principle opposition to the unjustified provision of further student housing, and the proposed height, scale, and massing of the development which would be of detriment to the appearance and character of the Twerton region of the conservation area, and harm the setting of two Grade II heritage assets.

Based on assessment of this application, we conclude the current proposal is largely similar with regards to its proposed height, scale, and massing, use of materials, and return to a sawtooth roof profile previously proposed under application 20/01794/FUL (see 26/05/2020). We note that some design changes have been made, principally to the western elevation with the introduction of a twin gabled profile with chamfered ground floor. We feel that this view of the proposed building has significantly improved as part of the western arterial approach to the city centre. However, on the basis of the substantial similarity with refused scheme 20/01794/FUL, we maintain our previous objection on the same grounds. We reiterate our previous comments as follows:

**Student Accommodation**

We acknowledge the varied development potential of the Twerton Riverside Enterprise Zone as noted in Policy B3 of the Core Strategy and Placemaking Plan. However, Policy ED2B emphasises “Applications for residential development or others uses will normally be approved unless there is a strong economic reason why this would be inappropriate.” Considering the Hollis Building’s continued occupancy by Mercy in Action, this would constitute a strong economic reason for the continued storage/distribution (B8) use of the site. Policy B3 highlights “areas of conflict between industrial activity and residential areas” as a risk to Newbridge and Twerton Riverside; Policy B5 highlights that “proposals for off-campus student accommodation […] will be refused within the Central Area, the Enterprise Zone and on MoD land where this would adversely affect the realisation of other aspects of the vision and spatial strategy for the city in relation to delivering housing, and economic development.”

We strongly maintain that any residential development on this site, with its convenient proximity to the RUH and Bath’s industrial sites and offices, should comprise accommodation for local residents and essential workers. Moreover, this application does not take account of the predicted impact on student numbers from the Covid-19 pandemic, such as potentially increasing numbers of students studying from home. We reiterate Professor Sue Rigby’s statement regarding the lack of proposed future growth by either of Bath’s universities in the current circumstances (27/05/2020), and highlight recent applications for the change of use of PBSA rooms to provide short-term holiday lets due to lack of demand (see Twerton Mill, 20/04796/FUL). There is consequently no justifiable demonstration of future demand, intended to be met by this development.

We additionally feel that the development of further Purpose-Built Student Accommodation (PBSA) adjacent to the Twerton Mill site and to the west of Charlton Court, as well as on the periphery of the HMO Test 1 area (indicating a minimum HMO saturation of 25%), represents a disproportionate concentration of student accommodation within the Twerton area. This would be contrary to the aims of B&NES’ HMO SPD 2013 to encourage a sustainable balance of communities throughout Bath, and Policy D1 of the Core Strategy and Placemaking Plan.

We strongly question the potential of the building to be effectively adapted for alternative, long-term residential use by local individuals and families, due to the small size of the internal residential units, and lack of appropriate outdoor private amenity space.

**Height, Scale, Massing, and Appearance**

In accordance with B&NES Building Height Strategy, new development within Zone 3 should have a maximum shoulder height of four floors, with one additional setback storey within the roofscape “likely to be acceptable”. Whilst one additional storey may be deemed permissible within developments along Lower Bristol Road, this is not applicable to sites “in close proximity to existing 2-3 storey residential areas”, and a height of under four storeys is encouraged in response to nearby heritage assets and the amenity of the occupants of existing residential dwellings. Therefore, the development, as proposed, constitutes overdevelopment of an excessive height and massing, which is contrary to local policy guidance, and would be over-dominating and incongruous, resulting in a detrimental impact on the established scale and townscape character and local views and harm to the setting of multiple Grade II heritage assets.

We highlight the council’s right to implement modifiers where it is felt necessary, both upward and downward, and highlight the need for an improved sensitivity of height and scale in close proximity to a very rare example of Victorian back-to-backs in Bath.

We emphasise that the comparison with the Twerton Mill student accommodation block in scale and materials is inappropriate, owing to the setback of Twerton Mill’s five-storey building alongside the river, behind a lowered three-storey roadside elevation with a stepped-down two storey section to the west which better complements the Lower Bristol Road streetscape, avoiding overshadowing designated heritage assets such as the adjacent Rackfield Place and Twerton Viaduct. Furthermore, the use of red brick is restricted to the riverside blocks, recognising the distinct difference in material character along the riverside and within the set-back street scene. We maintain that the success of the Twerton Mill scheme is furthered by its use of amenity space and pedestrian access to break up the scale and density of residential blocks, and improve the site’s permeability and streetside presence.

Conversely, the proposed scheme constitutes overdevelopment and would be monolithic in height, massing, and appearance, in views from both Lower Bristol Road and Weston Island, with little variation in its roof articulation or recession which might help to break up an otherwise imposing and bulky insertion within the streetscape. This drastic increase in height would have a ‘canyoning’ effect on this narrow portion of Lower Bristol Road and would significantly overshadow the Grade II Twerton Viaduct, and views from the Viaduct itself, which remains a prominent feature within this region of the conservation area.

Whilst we feel that the articulation of the sawtooth roof is more effective than the refused flat ‘mock mansard’ profile, sawtooth roofs were generally used on buildings of a much lower profile, as shown in the historic reference image of Carr’s Mill (DAS p.30), and as seen up until recently, the former Bath Press building. A sawtooth profile in conjunction with the proposed height would be overly dominant in height and scale and overwhelm its lower scale built context.

Furthermore, we do not feel that the proposed design suitably accounts for its close proximity and consequent harm to the setting of the Grade II Rackfield Place; the three storey eastern block would sit above the ridgeline of the terrace, and lead sharply into the four and five storey central block, with an additional half storey in the sawtooth roof profile and exaggerated ground floor height, without adequate set back to avoid direct overshadowing. In a difference from the previous refused scheme, the stepped down three storey eastern block has been reduced from two bays to one in width, further reducing the visual buffer between the development and Rackfield Place.

We consider that the extensive use of buff brick across the primary road-facing elevation is incongruous in an area of primarily coursed Bath rubble stone and Bath stone ashlar. We remain concerned by the lack of specification of the brick and mortar type that will be used, and consequently what finish the building will have. We strongly recommend that materials, specifically the type and colour of brick, are resolved within this application and not left to a Condition. All materials should be specified, with samples provided, before this application is approved. We additionally advise that the type of rubble stone and bonding to be used is specified as part of the application; we would recommend the selection of an oolitic limestone that would complement the extant material character of the conservation area.

**Conclusion**

The proposed development continues to be excessive and visually dominating in its height, massing and appearance**.** It constitutes overdevelopment of the site, with associated harm to multiple heritage assets, the conservation area and the setting of Grade II listed buildings. The development would, therefore, neither preserve nor enhance the distinctive streetscape character of the Bath conservation area, and would fail to contribute positively to local character and distinctiveness.

There is an absence of suitable justification for the further provision of PBSA along Lower Bristol Road, or demonstrated consideration of the future impact of Covid-19 on future student numbers and associated decline in demand for accommodation.

This application is therefore contrary to the Planning (Listed Buildings and Conservation Areas) Act 1990, Sections 12 and 16 of the NPPF, and Policies D1, D2, D3, D4, D5, HE1, and B5 of the Core Strategy and Placemaking Plan, and should be refused.