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**Statement to Planning Committee 09/02/2022**

**21/04147/FUL**

Frome House, Lower Bristol Road, Westmoreland, Bath, Bath And North East Somerset, BA2 1EY

Enlargement of Frome House and associated change of use from office (Use class E(g)) (Excluding existing ground floor tyre repair centre) to 67 student bedspaces and associated works.

***Against***

This site forms part of a predominantly low-profile area of two-three storey post-Victorian residential terraces along the Lower Bristol Road. The area also features later commercial and industrial development, most notably the single storey Grade II former cabinet maker’s factory.

Within this context, Frome House is **already** a building of significant height and massing.

The proposed increase in volume would constitute overdevelopment of the site due to excessive height and massing. The proposed five storey height of development would be an over-dominant addition in this low-rise area and adjacent to the Grade II factory building, contrary to the Bath Building Height Strategy. The proposed mansard profile would make the building appear even taller and more visually imposing in wider streetscape views.

As proposed the building would fail to successfully breach the transition between the open, low-rise grain of its setting, and the more ‘built-up’ areas of development towards Twerton Mill to the west.

The proposed **‘faux Georgian’** design is incongruous with its built setting which is predominantly of post-Victorian character, including notable examples of late 20th century industrial architecture. The use of a bland copy of Georgian architecture is disingenuous and would fail to respond to or reinforce local distinctiveness, and would have an adverse impact on the integrity and cohesiveness of the World Heritage Site.

This Authority should be asking for **more** than a “conventional and inoffensive” design on a site described as a “gateway location at the entrance of Bath”.

BPT maintains an in-principle objection to the speculative provision of purpose-built student accommodation without demonstrated need, and legal ties which ensure that occupancy is linked to the university provider. The site is located in an area of 25% HMO saturation with a high concentration of existing student accommodation at Twerton Mill, Waterside Court, Charlton Court, and permitted developments at The Old Bakery and the Jubilee Centre, and therefore already has a **disproportionate** makeup of student-orientated housing.

There continues to be a lack of material evidence that PBSA schemes have freed up HMOs in Bath, and HMOs remain a more attractive and affordable alternative for students and young people. This argument does not convincingly justify the continued overprovision of private student accommodation on land that is required for housing and other commercial uses in line with Bath’s vision, identified as part of Policy B5.

**We welcome the opportunity to retrofit the existing building as a greener alternative. However, the proposed height, massing, and design of development would fail to respond positively to local townscape character with adverse impact on the setting of the conservation area and World Heritage Site.**

**We therefore call for this application to be refused.**