



Milsom Quarter Masterplan

DRAFT

Consultation Response

July 2022

Summary

BPT's Architecture Planning and Place Committee has undertaken an in-depth review of the masterplan documents (<https://beta.bathnes.gov.uk/milsom-quarter/view-masterplan-documents>) and site visits of the area. The Committee felt that the vision for the Milsom Quarter, and emphasis on the seven priority sites identified is good and the well-defined and thorough approach was warmly welcomed. The Committee undertook a detailed appraisal of the vision and related documents and a full response has been compiled.

Overall BPT welcomes a master plan for Milsom Quarter Plan, however it needs much more integration with a vision for the future of the City of Bath as a whole - this master plan should sit alongside a comprehensive overarching strategy or strategic plan for the spatial development of the city, which includes city-centre public realm, transport and movement, accessibility, commercial vision and sustainability. A strategic planning and development framework and decision-making approach which has awareness of the interconnectivity of multiple locations and wider sphere of influence is required in order to deliver the step change necessary for the wider city environment to address climate change, place quality, and liveability, ensure ongoing economic success and address prevailing social inequalities.

The response provided should not diminish the view that the masterplan and related detailed proposals are good. The intention of providing a detailed response is to make the masterplan excellent and to challenge B&NES Council to achieve the maximum possible potential for the quarter and for Bath. The plan must also be sufficiently flexible to accommodate and respond to more stringent targets in the future as national policy adapts to the realities of the Climate Emergency.

Our primary response to the long-term development of this area as defined in the masterplan and related supporting documents has raised a number of questions and some need for clarification and consistency as follows and set out in further detail in this document.

1. There is a pressing requirement for a strategy for the spatial development of the City so that this masterplan, and others are not considered in isolation.
2. Masterplan area boundaries exclude interconnected sites and should be amended.

3. Milsom Street represents the communal heart of Bath in the present day for major events and civic functions and more should be made of this in the vision for the area.
4. Milsom Street must remain uncluttered so that its authentic character remains legible.
5. A robust and compliant streetscape maintenance strategy, which sets out the approach and timetables for essential and overdue repairs to hard landscaping and guideline complaint materials, must be implemented and enforced by the Council, with a consistent city-wide approach.
6. More evidence needs to be provided to support the commercial concept and need for development on Broad Street car park - is there local demand for SME's and where is the business case?
7. Infill development at Broad Street carpark must be more subservient to the existing townscape.
8. Walcot Gate deserves development that responds to the character of Walcot Street and protects views to Bathampton Down - the visualisations in the masterplan fail to illustrate a locally distinctive or heritage sensitive response that is harmonious with the rhythmic pattern of Walcot Street.
9. Public realm improvements on Johns Street must be included to facilitate the success of the proposed arcade through Jolly's.
10. The masterplan must be supported with detailed location specific guidance for commercial signage.
11. Wayfinding will be critical to the success of the plan, particularly the new east-west routes. Also integrating with adjacent areas to ensure visitor expectations are not limited to the quarter and maintain the viability of businesses and attractions to the north.
12. Some of the points made about Sustainability are not in line with other national guidance or local policies. Much better knowledge and understanding about this important part of the scheme should be applied.
13. Whilst it is wholly understandable and necessary to secure a long-term home for the important Fashion Museum by taking on a large new building, we feel the Council should also commit to providing a convincing plan to bring its significant existing portfolio up to standard.

General comments

Overall BPT welcomes a master plan for Milsom Quarter Plan, however it needs much more integration with a vision for the future of Bath as a whole - this master plan should sit alongside a comprehensive overarching strategy or strategic plan for the spatial development of the city, which includes city-wide public realm, transport and movement, accessibility, commercial vision and sustainability.

BPT advocates a heritage led approach to the renewal and revitalisation of retail and housing in the Milsom Street Quarter, that gives priority to creating affordable housing to rent and buy and repurposing and retrofitting existing residential and retail buildings to improve energy efficiency and reduce carbon emissions. 'Fashion-led' regeneration places far too much emphasis on the fashion museum and fashion retail as the main driver for renewal. While many historic uses of building were fashion retail on Milsom Street, there are many other residential, commercial, retail, trading and manufacturing uses in the masterplan area. For example, the retail of crafted items for the home was as abundant as fashion. The area of fashion focus stated in the masterplan is far less than the other range of 'complimentary' uses, and communal function in the present day, so it doesn't justify this

selective badging. We support a more flexible approach to retail, not exclusive to fashion, in the whole area

The masterplan site is within the City Centre area of the City-Wide Conservation Area and at the heart of the World Heritage Site. Much of the historic townscape is intact and in a good state of repair, aside from the Old King Edwards School and the Cornmarket. These are significant ‘anchor’ heritage buildings at risk and priority should be given to securing their occupation, repair and continued use. The quality, scale and setting of significant heritage buildings presents some real opportunities for inward investment. Preserving and enhancing the character and appearance of this part of the conservation area must be a principle objective in the management of change as set out in primary planning legislation.

BPT strongly encourages that this masterplan should be accompanied by a robust (and Pattern Book/Streetscape Manual SPD compliant) streetscape maintenance strategy that sets out the approach and timetables for essential and overdue repairs to hard landscaping and guideline complaint materials. Which must be implemented and enforced by the Council. We emphasise the need for consistency and coherence with the Bath Pattern Book for street furniture and landscaping across the masterplan area.

We emphasise the need for early inclusion and consideration for accessibility in proposals for the public realm and strategic repurposing.

We also feel that this masterplan has missed an opportunity to evaluate and plan for the night time economy.

Masterplan boundaries

The northern boundary remains arbitrary with no clear rationale for the exclusion of parts of the northern side of George Street, yet the inclusion of Edgar Buildings and the exclusion of commercial frontages on the Paragon at Bladud’s Buildings. While we recognise that the Hilton is outside of the scope of the masterplan, the podium and library, and property between Northgate Street and the river are within B&NES ownership and should be brought within the scope of the masterplan and long-term vision for the area, given their impact on the connected public realm. Historic (abandoned) public realm at Northgate (Slippery) Lane and future access to the Colonnades should be included in the vision for the area. This would be a wonderful opportunity to better reveal the medieval narrative of the city, and link it to other medieval features, e.g. at Milsom Place.

Commercial Concept & Residential Uplift

The business case needs to be more explicitly made for all quarters and priority sites in the area. Need/demand must be demonstrated for workspace, new forms of leisure and new forms of food and drink.

It would be useful to understand the rationale and research which underpins the assertion that the redevelopment would act as a magnet to attract new fashion-oriented retail or micro-enterprises. The retail industry is fragile at best and consumers have not returned to the High Street in the numbers necessary to facilitate significant growth, hence highly variable occupancy rates.

The 'build it and they will come' approach needs a solid understanding of the market and the potential for private investment. Evidence based projections must consider the short, medium and long-term implications for this area relating to occupancy, maintenance and the changing nature of retail space requirements.

The primary basis of this concern is the difficulty achieving full occupancy for Milsom Place and the failed purpose-built Colonnades Shopping Centre. These are not a reason not to pursue the Milsom Quarter Plan, but demonstrate the problems in achieving full occupancy in a purpose-built shopping area.

Conversion of the floors above the shops for housing/creative space/work space is commendable, but shouldn't be allowed to be an excuse for loss of floor plan and historic fabric. Long-term leases involving the care and maintenance of the buildings by responsible tenants would obviously be preferable to Airbnbs and temporary commercial occupation.

Provision must be made for genuinely affordable housing.

Movement Strategy

Backstreets, pedestrian through routes are established and well used. We welcome new east west routes and doubled sided access where possible. Comments on access and movement are made in response to the key areas below.

Pedestrianisation of part of Broad Street is in line with similar approaches elsewhere in the city. This is welcomed, subject to the following.

It is evident that some residents and businesses maintain concerns about the impact to movement, access and the provision of services to their properties. Increasing the number of residential units in the area will potentially exacerbate access issues. B&NES Council should commit to open consultation with local residents about how this will be managed effectively and respond appropriately to those concerns. BPT are concerned that the consideration of the Milsom Quarter in isolation has significant risks and implications to adjacent areas, particularly to the north. This will affect businesses in Lansdown unless a similar Masterplan is prepared for that area. An effective, comprehensive and holistic Wayfinding Plan is essential to ensure that the movement strategy is realised to its fullest potential. We are supportive of the proposals to increase greater east-west through movement but this will only work if supported by effective and clear signage.

We note the limitations to the current street map installations, and maps are out of date due to the challenge and cost of replacement or renewal. The Pattern Book street furniture would benefit from a review to ensure maps are more straight-forward to update.

We welcome the potential for the pedestrianisation of Broad Street and the removal of traffic from part of the street.

Sustainability Strategy

Given that a high percentage of property within the masterplan area is within the Council's ownership this is a significant opportunity for B&NES to lead by example to facilitate and undertake suitability retrofits, switch from gas to electric, and introduce micro renewables on an exemplary and impressive scale in order to reach net zero by 2030. Targets won't be met unless B&NES take direct climate action for its own buildings and land. The masterplan

needs to go further to show which buildings and sites there is a firm and binding commitment to retrofit.

For existing housing, overheating must also be seriously considered and mitigated (especially if insulation and draughtproofing is improved) for the homes above shops. Especially the flats above shops on Milsom Street.

Some of the assertions made in the Sustainability Strategy need to be better understood and do not appear to correlate with other evidence. For example:

- Double glazed secondary glazing installed in historic properties should have a much greater impact on the thermal performance of buildings than the 3% cited. The secondary glazing installed at the new World Heritage Centre demonstrate that these units can be installed in historic properties.
- There is no mention of suspended floor insulation, which is within scope of the retrofitting SPD and according to EPC guidance can reduce heat loss by 7%.
- ASHP figures do not appear to consider the increased cost of electricity to supply, although they are potentially a positive alternative to gas heating.
- Internal wall insulation is within scope of the retrofit SPD, but is cited as out of scope of current policy.
- Other non-planning related interventions should be listed, such as insulating lime plaster, heat reflecting paint, window filming, and draught-proofing.

As the Milsom Quarter proposals will require significant groundworks, has any consideration been given to the installation of GSHP technology as a longer term and less visually intrusive option?

Is the Transition Fund investment transparent and available to view online? Will the investment provide the carbon savings required? Perhaps the council should invest in land acquisition to extend the Green Belt as a local carbon asset.

It is worth clearly stating that some of the principles stated in the Sustainability Strategy are not achievable or supported by other B&NES Council policies. In the Introduction, it states, “All new buildings to be zero carbon.” This implies a zero-carbon build, and zero emissions in end use. This is applauded as an aspiration but is not supported by other policy statements. We would like to see zero carbon build and zero carbon emissions in end use.

We are unsure of why retrofit would be ‘constrained’, as stated.

Page 124: “Currently, the Sustainable Construction and Retrofitting SPD alongside the planning process is significantly reducing the ability to retrofit heritage buildings within the area.” This is not a true statement but more could be done by the Council to make the process more straight-forward. The process to retrofit historic listed buildings may require more administration and detail but as has been shown by B&NES Council at the new World Heritage Centre, it is wholly achievable within current policy.

Milsom Street Core

Authentic character should be at the heart of the vision for the Milsom Street. Originally built as a residential street, Milsom Street has been at the heart of Bath’s shopping area since not long after the street was built. It is the pre-eminent shopping destination in Bath and therefore has many illustrative and evidential stories to tell about the city’s history and its cultural, social and economic cycles. In the 19th century the street became the hub for

civic functions and street celebrations for major events. It continues to represent the communal heart of Bath.

Milsom Street retains much of its original unifying Georgian character above the attractive layering of historic and modern shop fronts. The high quality and significance of the street is reflected in the fact that all of the buildings are listed Grade II (with 1-22 designated as a group) or II* (Somersetshire Buildings) and the street as a whole is a highly significant heritage asset with multiple heritage values.

With a continued emphasis on retail in this highly sensitive townscape we urge the Council to create a Milsom Quarter specific advertisement and signage design guide, in consultation with stakeholders.

Public Realm

While we would like to see provision for some greening and enhanced biodiversity in the public realm generally, planting trees in Milsom Street, is directly at odds with the intended urban design and architectural concept of the Street and could have potential to block the vista from George Street towards Beechen Cliff. Furthermore, the roots could be damaging to all the vaults which run under the street.

Green infrastructure could perhaps be in the form of shrubs, climbing and trailing plants on low level structures, or espalier (usually fruit) trees trained horizontally at a low level. Indigenous plants which have coherence with the surrounding area / other city greening initiatives will have a better benefit for biodiversity. The use of peat-based composts and imported annuals should be avoided at all costs.

Milsom street has strong linear architecturally framed views up to Edgar Buildings and down to the Old Bond Street Island; these views form part of its special character. The consultation video shows the adverse impact that trees and their canopies can have on obscuring the present open views of buildings in the street and views along it to the north and onto the listed Edgar buildings on the listed raised pavements. It is the built street scene that is an attractive part of its character, and the contrast between historic streets unlined with trees, such as Milsom Street, and those spaces planned for trees or landscape that form the special character of Bath.

Temporary food, and other, stalls have potential to harm the public experience of the Street - we doubt that they could really work in Milsom Street, as we've seen in the past, because there is no "back" available, so the behind-the-scenes can't be concealed.

Filling the street with clutter, stalls, and installations of a casual and tawdry nature would be entirely at odds with the original design of the Street.

Pennant paving still in good condition, including the matching stone plinths to the benches, and the carved inscriptions at the southern end. It already has the effect of narrowing the carriageway and providing wide areas of pedestrian paving, so surely it could and should be retained, in the interests of both aesthetics and environment.

We advocate for the use of pattern book street furniture and materials on Milsom Street.

The historic line of the pavement edge appears to have been lost in visualisations. The pavement is substantially wider in the CGI's (proposals?) illustrating a very narrow road running down the centre of Milson Street. Also, the paving illustrated is inappropriate - the

horizontal bands of pavements, some a different colour to others, is alien to traditional stone paving and patterns found in Bath.

The cumulative impact of all the proposals on this important street should not be underestimated.

BPT therefore would prefer Option 4.

Broad Street Car Park/Yards (priority site 1)

Former land uses at Broad Street carpark include stables and coach houses - providing some historic precedent for built infill.

The concept for Broad Street carpark requires further evidence base for the requirement for workspaces, micro-shops and food and drink, that could not be provided in existing buildings. The primary objective should be to lower rates and occupy vacant premises before carbon intensive construction.

More detailed presentation of the concept is needed to better understand the design development behind the Broad Street Yards visual, as there is much to respond to in terms of scale, typology and architecture etc. The removal of parking and cars is supported and this site could potentially be a very exciting and animated space. Some success will depend on how the site is accessed, views framed through the site and if any of the rears of the historic buildings can become active frontages.

We have some concerns about the scale, and height of buildings and the impact on the setting of surrounding listed buildings and emphasise the need for subservience. We highlight the need to maintain views towards the Octagon roof.

Any development should have active links, permeable routes and access, to any future development at King Edwards School.

BPT supports Option 2 which brings in land and building outside B&NES ownership as this would be critical to the success of any redevelopment.

King Edwards School (priority site 2)

As stated above any future development of the KES site needs to be integrated with Broad Street car park yards.

The Council should be doing everything within its power to CPO the vacant 'Building at Risk' site and bring it within the long-term vision of this masterplan. Once in public ownership opportunities for funding will follow.

Milsom Place (priority site 3)

For the retail and food and drink offer at Milsom Place to change rates need to come down. A business rates incentive is critical to improving the vitality of Milsom Place. Milsom Place would potentially benefit from a mix of food and drink uses to suit all pockets, and for

people living and working in the area. Perhaps small food and drink units, such as the restaurants and cafes at Brixton Village, and St Nicholas Market in Bristol could work here to enliven the space and create a destination.

Broad Street Place/YMCA courtyard (priority site 4)

This intimate urban space is better known and used by local people using the services offered by the YMCA and Osteopaths, for example. We would encourage the reopening the rear access to the retail units to improve use and surveillance. The space would benefit from becoming more inviting to passers-by and we encourage more compelling public art. The general approach to enhancing this area is supported.

Jolly's Department Store (priority site 5)

BPT supports the retention of Jolly's as an anchor department store. We would not oppose the creation of a ground floor arcade and through route in principle in the position shown (no.22?), provided the need and public benefits are justified. The obvious heritage impact would need to be presented along with the case for evidence-based need/justification, and the public benefit of increased pedestrian access and permeability. We recognise the potential footfall benefit of improving west-east access from the Charlotte Street car park, however success would be heavily dependent on improvements to the public realm on the John Street side. Old King Street would require parking to be removed and landscaping to increase visibility of access to the arcade on this side.

The interior of Jolly's has been heavily altered. In any further rearrangement of the internal layout the public visibility of the cornice frieze, and access to Queen Mary's dressing room should be retained.

St Michaels Neighbourhood

In principle we support the pedestrianisation and remodelling of the public realm of Broad Street. This characterful street has the potential to become the USP of the Milsom Quarter. Again, we emphasise the need for consistency and coherence with the Bath Pattern Book for street furniture, bollards, materials and landscaping. And approaches that minimise clutter, in particular pavement planters.

Northgate Yard/Old Post Office (priority site 6)

Rehousing the fashion museum at the Old Post Office brings this building back into a long-term secure use and is strongly supported. This use raises the ability of Bath to have a world class museum in the centre of the city and associated economic benefit.

Walcot Gate/Cattlemarket /Corn Market (priority site 7)

Protecting and enhancing the unique, informal and artisan character of Walcot Street must be a principle objective of the masterplan. We strongly believe that in order to sustain the

character of Walcot Street and support sustainable communities redevelopment met should be mixed use rather than 100% residential as shown in option 2.

The Cattle Market site is a golden opportunity for a really exciting development, which provides an enhanced context to this entrance site. Development must be contextual, and relate to the height, scale and bulk of the historic townscape. The Hilton is not a good contextual reference.

The massing and orientation of proposed buildings in the visuals for the Castle Market site in particular do not work. The undistinguished deep plan, blocky development shown in the visualisation for the “improved entrance” is at odds with the charming character of Walcot Street and risks harming the setting of the Cattle Market and surrounding heritage assets. The flat roof shown in the masterplan illustration would do nothing to enhance local distinctiveness and some articulation is encouraged.

Any development on the Cattle Market site should respond to the Walcot Street elevation, the river frontage and take the opportunity to create a strong corner to the south west of the site, next to the Hilton, to repair a fragmented street scene and enhance the quality of townscape. If anything, the proposed site layouts would do the opposite. If development concept here is intended to indicate a ‘Gateway’ it should have visual distinction that strengthens local character and identity. The type of deep plan block shown risks being overly bulky, over dominant, bland and uninspired. And may completely block important views of the World Heritage Site landscape setting, to Bathampton Down currently experienced and appreciated from Walcot Street.

We have strong concerns about the deliverability of the Cornmarket for housing. This is perhaps the last chance for this semi-derelict building and it must be got right. The planform, amount of window and glass and space would make the building difficult and expensive to heat. We would like to see a feasibility study for this building included in the masterplan or its next steps.

Public realm

The Cattle Market/Corn Market buildings as shown on plan have a cramped building to plot ratio - not enough space is given to public realm or landscape setting for their proposed residential uses. While noting the private roof terraces, these buildings require some landscaping, even if that means moving the car park exit road a few metres southwards. Landscaping and natural daylight for lower levels of housing needs far greater design consideration. Otherwise the space surrounding the buildings will likely be unwelcoming, hard and hostile.

There may be the opportunity for considering a public space behind development on the Cattle Market Site fronting onto Walcot Street which also related to the Corn Market listed building, relating to the river and a river walk to Pulteney Bridge.

Access is shown as a road remaining through the Cattle Market site. We wonder if there may be an opportunity for the development to bring the access to the south of the Cattle Market site, where there is already an access point into the existing car park. This could be extended to the east serve the rear of the Hilton, Waitrose etc linking to the existing road. This would allow the Cornmarket to form a more active frontage to the development and public space, without cars cutting through the site to the north and east. If the Hilton site is not going to change, it seems preferable to push all the cars / access to this side and free

up the rest of the site where there is the river frontage and historic buildings to respond to, and integrate into the development.

The lower ground level and arched vaults to the Corn Market could be a great attribute to the development and could accommodate a variety of uses. It is also a key component in demonstrating heritage led regeneration and the historic use of the site, which looks to be lost in the proposals currently.

More must be made of the opportunity to provide a riverside walkway through to The Podium.

It is very important that the public experience of views towards Bathwick is retained.

Strategic Repurposing

We are broadly supportive of the priorities for strategic repurposing. These case study/potential repurposing sites need to be supported by feasibility studies and retrofitting strategies.

We would like to see a convincing strategy which may take the form of a completed Conservation Area Character Appraisal and Management Plan, for how the Council will bring all of its historic properties back to full use and appropriate condition.

Delivery and Implementation

B&NES now has a statutory duty to develop 'Design Codes' to shape future development and we would expect these to be in place, along with a Conservation Area Management Plan to support the implementation of the vision. We would specifically encourage design guides for advertising on Milsom Street, and for active frontages.