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**20/03166/FUL**

**Regency Laundry Service, Lower Bristol Road, Westmoreland, Bath, Bath And North East Somerset, BA2 3BX**

Erection of two buildings of up to four storeys comprising co-living accommodation with co-working space to the ground floor, alongside landscaping works, cycle parking and disabled car parking bays following demolition of existing buildings.

*Objection*

The Regency Laundry Service building is unlisted and is, in itself, of no particular architectural value. It is situated within the Bath World Heritage site, and forms part of the indicative townscape setting of the Bath conservation area, and contributes towards the setting of a cluster of Grade II early to mid-19th century terraced and semi-detached dwellings, including 1-27 Victoria Buildings, 1-6 Park View and associated garden boundary walls, and, directly opposite, 30-32 Belvoir Castle. The existing Regency Laundry building appears on the 1882-1888 Somerset OS as the “Bath Steam Laundry”; St Peter’s Church, now St Peter’s Place, and the Oldfield Park Infant School building appear to have been contemporary to the laundry in construction, and retain a positive architectural presence along Lower Bristol Road as Non-Designated Heritage Assets (NDHAs) of local historic and social significance.

In principle, the Trust supports the redevelopment of this brownfield site to meet current housing targets, and provide much-needed long-term accommodation within the city.

However, we have some concerns regarding the principle of co-living within the current context of Covid-19, and the failure to meet nationally described space standards and local policy requirements for mixed housing developments. We additionally do not consider that the proposed design and appearance currently sit well within the local townscape or enhance local distinctiveness, and we feel that the excessive height, massing, and layout proposed would constitute overdevelopment of the site.

**Co-Living Accommodation**

As the first substantial example of a proposed co-living scheme in Bath, we would emphasise the importance of getting this application right as a precedent for this type of accommodation in the city, should it be consented.

Initially, there appear to be some unresolved discrepancies within the application. Despite recommendations in the Stage 2 Coliving Report that “units are no smaller than 20sqm, in order to provide residents with a comfortable amount of living space within their unit”, the smallest unit offered as part of this proposal would be 19m². Whilst this claims to be justified by the “limited” number of these units available, the D&A Statement instead suggests that “the majority of rooms are either 19m² or 24m², with larger rooms provided for accessible residents.” We would therefore ask for greater transparency regarding room sizes and numbers.

We also have concerns regarding this proposed model of large-scale, shared living, in which none of the proposed self-contained studio rooms meet the nationally described space standards for a one-bed dwelling of 37-50m2, within the context of the recent Covid-19 outbreak and associated implementation of national social-distancing and self-isolation measures. How this proposed development could be adjusted to meet with social-distancing measures and restricted group sizes and household mixing is not apparent, neither is there consideration of the associated risks of this proposal’s dependence on shared social spaces. Considering the predicted long-term impact of the pandemic, the Trust therefore feels that new developments could better account for predicted housing demand such as improved space standards, and demonstrate increased future flexibility in internal layout and adaptation to alternative residential uses.

The Trust is, in principle, uneasy with development schemes that are restricted to a single type of residential use with inherent problems for future flexibility. Whilst we acknowledge that co-living “is not entirely restricted by any specific tenant demographic group”, there is a distinct lack of housing mix (one bed, two bed, etc) the young professional and graduate demographic is clearly targeted. We find this to be contrary to Section 8 of the NPPF, in which mixed-use developments are associated with “healthy and safe communities”, and Policies D1, D3, and CP10 of the Core Strategy and Placemaking Plan: “New housing developments must accommodate a range of different household types and people to provide a greater choice of housing type, and to create balanced, diverse, and sustainable communities.”

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

The Regency Laundry’s immediate streetscape setting is primarily residential, and is largely characterised by two storey, modest Victorian terraces in Bath stone ashlar with some commercial insertions in the form of local shopfronts, some of which have been converted to residential usage, with some 2½ - 3 storey additions such as St Peter’s Place. Whilst the Western Riverside development has incorporated buildings of a maximum of 9 storeys in height, these are not visible from the Regency Laundry’s position on Lower Bristol Road, and we would maintain that the homogenous palette of low-rise housing in this area should restrict any new development to a height in-keeping with its immediate modest, residential setting.

The D&A Statement notes that the Regency Laundry, in its current state, “possesses limited significance and makes little contribution to the setting of the surrounding heritage assets.” We are therefore surprised that the proposed three-storey reception elevation bears some notable similarity to the existing Regency Laundry frontage with a blocky, flat-roofed form. The use of an asymmetrical focus with the glazed porch and lack of elevational detailing is out of character with the well-balanced symmetry and repetition of the Grade II terraced streetscape. This development’s position on the roadside offers an opportunity for an architectural design more in-keeping with the townscape’s 19th century residential character, and this should be more thoroughly explored. We would also emphasise the importance of clarifying material types such as the proposed use of “lias limestone”; we would strongly recommend that this be resolved within the timeframe of this application and not left to conditioning.

We have reservations about the proposed use and volume of metal wall cladding in the scheme. Whilst the D&A Statement references the precedent of metal cladding as an industrial material utilised within the area, this is more indicative of a roofing material, and therefore not appropriate for external elevations facing onto the rear of Lorne Road and Dorset Close.

The overall height of the scheme fails to respond positively to its low-rise, Grade II setting. In accordance with the Bath Building Heights Strategy, “it may be necessary for the height to be less than 4 storeys in response to heritage assets, residential amenity and to prevent intrusion in views.” The proposed overall increase in height would challenge the standalone conical pitch roof of St Peter’s Place, which remains a distinctive NDHA within the townscape, and would directly overshadow the Grade II Victoria Buildings and Belvoir Castle terraces. Considering the prominent two storey appearance of the area with occasional three storey interjections that feature as focal streetscape viewpoints, the consequent scale and massing of the site would be overdominant. We would therefore suggest a greater variety of roof heights across the scheme to break up massing, and restrict the frontage to two storeys.

Furthermore, we are unhappy with the incongruous use of a faux mansard roof profile, a typically Georgian element, within a concentrated area of 19th century architecture characterised by a prominent use of pitched and gabled roofs. We do not consider this design to be in tune with the local residential vernacular visible along Lower Bristol Road. Rather it would be alien when viewed within its surrounding context. We would therefore recommend a roof profile more in keeping with the surrounding early Victorian architecture, or perhaps a more contemporary design demonstratively inspired by local industrial heritage, such as the Regency Laundry’s existing barrel vault roof.

In conjunction with the development’s proposed height, layout, and the failure to meet nationally described space standards, we feel that this would result in the overdevelopment of the site and would compromise the residential amenity of Dorset Close and Lorne Road due to the close proximity of 3-4 storey buildings to the site boundary.

**Conclusion**

In principle, the Trust is supportive of the residential redevelopment of the site. We fee; that a scheme of an appropriate design and scale could positively contribute to the social, architectural, and aesthetic significance of the streetscape. However, considering the low-rise appearance of the townscape and high concentration of Grade II 19th century terraces within the immediate contextual setting of the laundry site, we feel the proposed design in its current form would fail to respect or reinforce local distinctiveness and local townscape character, and would harm the setting of multiple Grade II buildings due to the proposed overall increase of site height and massing, and lack of meritorious detailing or form. This application is therefore contrary to Section 12 and 16 of the NPPF, and Policies B1, B4, BD1, CP6, D1, D2, D3, D5, and HE1 of the Core Strategy and Placemaking Plan. We would therefore encourage a reconsideration of design and use of materials to better complement the existing streetscape of Lower Bristol Street whilst becoming of greater visual interest in its own right.

We have concerns with the introduction of a co-living scheme within the context of Covid-19, which is overly dependent on communal space to make up for private studio rooms that do not meet nationally described space standards or local policy requirements for housing mix.