



## **Open Letter – Development of the Riverside in Bath**

### **[22/03224/EFUL](#)**

I am writing to you on behalf of Bath Preservation Trust to raise our significant concern about the next stages of development of Bath Western Riverside, proposed in plans prepared by Grimshaw architects, ref. [22/03224/EFUL](#). The new development proposed is a clear breach of the conditions requested by UNESCO following the phase 1 development of Western Riverside.

Current proposals for the development of Bath Western Riverside would present ‘ascertained danger’ of the cultural property defined under the 1972 World Heritage Convention:

- serious deterioration of architectural or town-planning coherence;
- serious deterioration of urban or rural space, or the natural environment;
- significant loss of historical authenticity

And ‘potential danger’:

- threatening effects of regional planning projects;
- threatening effects of town planning

We urge ICOMOS, Historic England, DCMS, DLHUC and UNESCO to engage directly with Bath NES Council about this matter. We urge Bath NES Council to use all available influence and policy to reject the current proposals and to insist upon a fully compliant development which does not harm the architectural or town-planning coherence of Bath.

Bath Preservation Trust is strongly supportive of large-scale sustainable housing development which brings design excellence to the [World Heritage City of Bath](#), but only if it maintains the aesthetic qualities and beauty of Bath (a UNESCO condition of integrity) and does not compromise or diminish its Outstanding Universal Value. The World Heritage status of Bath has created a vibrant, dynamic, living city which has so far avoided many of the economic, social and environmental damages caused to other cities following Covid-19 and in the face of a significant economic recession. The World Heritage Site draws visitors to Bath from around the world. It brings investment, economy, business, trade, opportunity and jobs for all people in the city and wider district.

In 2008, UNESCO challenged the commitment of Bath NES Council, to uphold and protect the Outstanding Universal Value of our World Heritage Site. The Outstanding Universal Value (OUV) describes the primary reasons why Bath was awarded this important and globally recognised inscription.

The World Heritage Site of Bath is highly unusual, covering the entire city and its green setting. UNESCO were sufficiently concerned that the adverse effect of new housing developments on Western Riverside would permanently cause harm to certain elements of value and integrity of the World Heritage Site. There was a genuine risk that Bath would be removed from the World Heritage List if the wholeness of the city was compromised by an incoherent height and design.

Following a visit to Bath in 2009, [UNESCO made the following recommendations, recorded at the thirty-third session in Seville](#), held on 20 July 2009:

- “Urges the State Party to submit to the World Heritage Centre and ICOMOS, for review, a time-bound revised plan for the second and third phases of the Bath Western Riverside project, including revised density and volume of the ensemble, so as not to impact on the Outstanding Universal Value of the property, its integrity and on important views to and from the property;
- Also recommends that the State Party enhance the protection of the surrounding landscape of the property to prevent any future developments which could have adverse and cumulative impact on the Outstanding Universal Value of the property”

Subsequent to the visit, Bath NES Council produced a [Building Heights Strategy](#) to define acceptable limits. The outcome should be the development of much needed new housing on a sustainable basis, which does not adversely impact the World Heritage Site. The strategy states that building heights on the valley floor should be 4 storeys and by exception up to a maximum of 6 storeys high. In its [Appeal Decision notice for the Homebase \(Riverside\) Site development](#), of 2<sup>nd</sup> September 2021, the Planning Inspector acknowledged the material consideration of the strategy and noted the 8-storey ‘landmark’ buildings of Bath Western Riverside as being exceptional in height, indicating that adjoining developments should be lower and within the limits of the Building Heights Strategy.

In the current Western Riverside Plans for the former Gas Works site (ref: [22/03224/EFUL](#)), at least two of the buildings exceed the height of the controversial landmark buildings in phase 1. The remaining buildings contribute significantly to cumulative harm of the World Heritage Site with excessive height and massing. UNESCO provided a clear warning that this approach would be unacceptable following its visit to Bath in 2009. In 2021, UNESCO demonstrated its will to strike sites from the World Heritage List due to the harm caused by inappropriate development.

If built as planned, the development proposals would also negatively impact the [City of Bath World Heritage Site Setting](#).

We note and understand that Bath NES Council is in advanced stages for its plans for the development of their plot on the former Gas Works site. We urge Councillors and Officers to bring forward plans which are fully compliant with the Building Heights Strategy and the City of Bath World Heritage Site Setting Supplementary Planning Document and which seek to unify the disparate adjoining developments of Bath Western Riverside phase 1, the former Dick Lovett site, Bath Press and the final approved plans for the Grimshaw development on the former Gas Works site.

When the buildings are built, it will be too late to influence change. Now is the time to stand up for the integrity and beauty of Bath and to demand compliance with local strategy and policy and the expectations of UNESCO.

### **Unaffordable housing**

There is a significant lack of affordable or keyworker housing in Bath and none is proposed in the Grimshaw plans for the new Western Riverside development. Zero affordable or keyworker housing was provided in the [Bath Press development](#), recently approved.

The reasons given include the cost of decontamination and remediation works on a former industrial site.

We encourage Bath NES Council to use the opportunities presented in the new [Subsidy control scheme](#), which comes into effect on 4 January 2023, to underwrite the cost of remediation and decontamination of development land. This should be offered on a conditional basis if private developers commit to contractually meet or exceed a 30% allocation of affordable or keyworker housing. This approach would demonstrate a genuine commitment to provide proper, appropriate and sustainable affordable keyworker housing in the centre of Bath. It would also provide the context for developers to reduce the height of buildings to comply with the Bath NES Building Heights Strategy.

Bath Preservation Trust submitted an [objection to the current development proposals](#) on 21 October 2022.

**Alex Sherman, Chief Executive**

**Bath Preservation Trust**

**15 December 2022**

Distributed to:

- Bath and North East Somerset Council – Councillors and relevant senior Officers
- World Heritage Site Advisory Board
- ICOMOS UK
- UNESCO Secretariat
- The Rt Hon Wera Hobhouse MP for Bath
- The Rt Hon Michelle Donelan MP, Secretary of State for Digital, Culture, Media and Sport
- The Rt Hon Michael Gove MP, Secretary of State for Levelling Up, Housing, Communities & Local Government
- The Rt Hon Lisa Nandy MP, Shadow Secretary of State for Levelling Up, Housing, Communities & Local Government
- The Rt Hon Lucy Powell MP, Shadow Secretary of State for Digital, Culture, Media and Sport