**Item 1 – BPT Objection Response to Application 21/04147/FUL, 14/10/2021**

**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.

*Object*

Frome House is a late 20th century unlisted building situated within the Bath World Heritage Site and the indicative townscape setting of the Bath conservation area. The existing building is three storeys in reconstituted Bath stone with an attached two storey building on the corner junction between Lower Bristol Road and Jews Lane. The ground floor currently functions as the premises of Bathwick Tyres, whilst the upper floors are vacant offices. The immediate setting of the site is predominantly residential to the north and west; adjacent to the site are a number of two storey Victorian terraces, Argyle Terrace, fronting Lower Bristol Road. There are examples of smaller, low-rise commercial properties at Avon Buildings, as well as the Grade II 1960s former cabinet maker’s factory, now a Lidl.

There is already a high concentration of student accommodation provision along Lower Bristol Road. Accommodation to the east includes Waterside Court and Charlton Court, which front Lower Bristol Road with four storey frontages. Similarly, Twerton Mill further west fronts the roadside at three and four storeys, forming a sense of visual enclosure adjacent to the Grade II Twerton Viaduct in sharp contrast with the more visually open setting of Frome House. In all cases, student blocks of an increased height are restricted to the rear, pushed back from the roadside to minimise visual impact.

We note this application’s reference to permitted scheme 18/02831/FUL for the redevelopment of the Old Bakery on Jews Lane for the provision of student accommodation. In that instance, the development would present a three storey frontage along Jews Lane with a recessed fourth storey running back to the east.

We are supportive of the principle of the reuse and refurbishment of the existing building. We maintain that ‘the greenest building is the one that already exists'; in light of the declared Climate Emergency, it is clearly of increasing importance to reuse our existing building stock and reduce carbon emissions generated through demolition and the construction of new buildings and construction materials. The retention of existing buildings also prevents the release of ‘embodied carbon’, or the carbon footprint generated from a building’s initial construction.

However, the proposed refurbishment in design, appearance, and scale are still expected to contribute positively to and reflect local townscape character. We are therefore unable to support this application due to the excessive height and massing of the proposed development which would constitute overdevelopment of the site out of keeping with local townscape character, and the use of an incongruous design and profile without adequate contextual reference.

**Design, Height, and Massing**

We support the use of Bath stone with direct material reference to the local architectural context, which would strengthen the site’s ‘sense of place’. However, we have some concerns regarding the ambiguity of the proposed material palette and maintain that the proposed “ashlar stone” or “ashlar cladding” should be Bath stone rather than a poorer alternative intended to replicate Bath stone (eg. reconstituted stone, Bath-coloured render, etc.). The proposed materials should be detailed and/or samples provided as part of this application rather than left for a later condition.

We consider that the proposed height and massing of the development are excessive in relation to its contextual setting. In the Bath Building Height Strategy, it states that “building shoulder height [in Zone 3] should be four storeys. One additional setback storey within the roofscape is likely to be acceptable.” It goes on to state that “1 additional storey may be acceptable along Lower Bristol Road **except where it is in close proximity to existing 2-3 storey residential areas**.” It surely follows that the proposed five storey height of the building would be excessive within a predominantly 2 storey residential streetscape and adjacent to the Grade II former cabinet maker’s factory, which clearly characterise the height and grain of this section of Lower Bristol Road.

The site forms part of a marked transition between the more ‘built-up’ enclosed streetscape to the west, and the open, low-rise grain of its more immediate setting. We consider that the site, as a “gateway location at the entrance of Bath” (Planning Statement), could offer a more gradual progression between built densities to reconcile these two areas. However, the proposed five storey height remains excessive and over-dominant in wider views, providing a jarring contrast in streetscape views from the east with a sharp increase in roof height overshadowing the adjacent terrace.

A ‘faux Georgian’ architectural style has been selected to “to better [reflect] the vernacular of larger buildings elsewhere in Bath” (Planning Statement), but this ignores the immediate vernacular of this section of Lower Bristol Road which is largely characterised by low-rise Victorian terraces with notable examples of late 20th century industrial architecture. The proposed mansard roof and parapet instead serve to make the building appear taller in height and more visually imposing. The use of a Georgian-inspired form and profile in this setting is inappropriate.

There is an opportunity for a more responsive design drawing on local examples, such as Victorian vernacular, or a more contemporary, industrial-inspired design (see the adjacent Grade II factory building) which would be more honest to the late 20th century origins of the existing building.

In its current form, the development represents a bland copy of Georgian architecture outside of its city centre context, and therefore fails to respond to, reinforce, or contribute to its townscape setting or local distinctiveness.

**Purpose-Built Student Accommodation**

BPT is, in principle, resistant to speculative PBSA within Bath, without adequate justification or demonstration of demand. The site is located within an area of high PBSA provision and over 25% HMO saturation, and therefore already has a disproportionate makeup of student-orientated housing.

We note that the site is within close proximity to the new Locksbrook Campus and could be appropriately-located accommodation for Bath Spa University students as part of the university’s strategy for ‘walkable campuses’. This application could serve as an opportunity for the provision of student accommodation in partnership with the university to ensure provision is targeted at a specified demand.

We would be less resistant to the provision of student accommodation as part of an interlinked partnership with the university to address either current student demand or anticipated demand as part of the university’s planned growth. A ‘nomination agreement’ would be used to ensure the long term association of the two sites and restrict the future residents of Frome House to prevent more speculative use. This could ensure the future sustainability of the site, help to address concerns such as overprovision of student accommodation, and prevent potential changes of use to alternative, less desirable uses such as AirBnB flats.

**Conclusion**

Whilst supportive of the opportunity for the reuse of the building and the retention of the tire repair centre, the proposed height, massing, and design would fail to respond positively to local townscape character and constitute overdevelopment, and would have an adverse impact on the integrity and cohesiveness of the World Heritage Site. We remain resistant in principle to speculative PBSA. This application is contrary to sections 11 & 12 of the NPPF, and Policies CP6, D1, D2, D3, D4, D5, D6, HE1, B1, and B4 of the Core Strategy and Placemaking Plan and should be refused or amended with a more height-appropriate design.

**Item 2 – BPT Statement to Planning Committee Against Application 21/04147/FUL, 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.**