**22/04431/FUL**

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

Redevelopment of the former laundry services site to provide three storey building plus inset mansard roof comprising self-storage units (Use Class B8) with ancillary Business Centre Facility, signage and associated works

*Objection*

The proposed site of development is the former Regency Laundry Service building, situated within the Bath World Heritage Site and the indicative townscape setting of the Conservation Area. The laundry was originally built in the late 19th century but has since been the subject of significant later alterations, including the addition of a two-storey flat-roofed frontage in reconstituted stone which defines the building’s contribution to the Lower Bristol townscape. The building forms part of the setting of a number 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. It also adjoins a number of Non-Designated Heritage Assets (NDHAs), including the Oldfield Park Infants School, St Peter’s Place, and St Peter’s Lodge (see Somerset HER).

This localised section of Lower Bristol Road is characterised by its predominantly low-profile height and form at two-three storeys, in which taller features such as St Peter’s Place are considered to be positive landmarks. Nearby development of a much greater scale such as Western Riverside is set further north along the river bank, behind the modest two-storey Grade II terrace at 1-27 Victoria Buildings which retain a strong, uninterrupted presence within the townscape. The area does include a higher concentration of light industrial and commercial buildings (particularly around Bath Quays North and the Dick Lovett car dealerships); however, the Regency Laundry site is tightly enclosed within an area of high residential density. The east boundary is abutted by the terrace at Lorne Road, and the adjacent buildings along the southern side of Lower Bristol Road incorporate a mixed-use retail/residential use. St Peter’s Place has since been converted to residential flats.

In principle, BPT supports the redevelopment of this brownfield site. We recognise the need to retain appropriate levels of industrial land and capacity within Bath to meet strategic objectives; however, given the strong, residential character of the surrounding built environment we highlight potential conflict going forward between the success of this site and the amenity of adjoining residents. We therefore highlight the potential future re-consideration of how this site could be repurposed and re-developed, such as a mixed-use scheme that incorporates a residential/housing aspect such as affordable, well-connected housing for key workers, that complements a retained commercial employment use,

In response to the proposed built form, we have very strong concerns with the proposed height, scale, massing, and bulk of development which would constitute overdevelopment of the site and would have an adverse impact on local distinctiveness and the domestic scale of its surrounding townscape character.

The development would propose an uninterrupted, four storey height across the entirety of the site without any variation in roof height or articulation to break up the scale or massing of the building. The overall height of the scheme would fail 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 four storeys in response to heritage assets, residential amenity and to prevent intrusion in views.” The proposals would see the height of the street-facing north elevation increase to three storeys (proposed Section D-D indicates that this would be of a taller height than the existing barrel roof of the Laundry building) and as such would increase the building’s already heavy flat-roofed presence within the townscape and directly overshadow the Grade II Victoria Buildings and Belvoir Castle terraces. An increase in height would also challenge the standalone conical pitch roof of St Peter’s Place.

Whilst the development would be set further back from the roadside to allow for an increase of on-site parking, the footprint of the proposed building would extend to incorporate the majority of the site, resulting in a deep floor plan and unvariegated scale which would have a resulting, imposing presence in contrast with its surrounding built context. Whilst of a high density, the surrounding area is made up of modest residential terraces which are visually broken down by through roads and views across residential gardens. Examples of industrial buildings with deep floorplates are present within the streetscape, but these are generally limited to one-two storey heights which allow them to better recess into wider views of the townscape and maintain sightlines out to Bath’s landscape setting. The cumulative impact of a deep plan with a continuous four storey height would therefore result in a monolithic structure of a bulk and massing at odds with its local townscape context.

Considering the prominent two storey appearance of the area with occasional three storey interjections that feature as focal streetscape viewpoints, the oversized and impermeable scale and massing of the site would therefore be over-dominant and would fail to respond to or reinforce the visual amenities of the area, contrary to Policies D1, D2, and D3.

In our response to refused application 20/03166/FUL, we expressed reservations about the proposed use and volume of metal wall cladding where this material is more indicative of a roofing material. We therefore maintain that the proposed volume of metal cladding across all external elevations and the roof would result in a monotonous appearance with no distinction in elevational treatment or roofscape, and would not be appropriate within an area of predominantly residential grain.

The extent of blank, four storey flanking walls would have an adverse impact on the amenity of neighbouring dwellings at Lorne Road. The existing Laundry site is already prominent in views across the garden, and in some cases backs directly onto the gardens’ western boundary, as per the following examples:

* <https://www.rightmove.co.uk/house-prices/details/england-128955947-26140908?s=1cce36182fd7212784dab43162a4aaabda9a8f1ff70d52bf8088fc199b46f71b#/media?id=media8&ref=photoCollage>
* <https://www.rightmove.co.uk/house-prices/details/england-63287978-88635765?s=fea5dc40b9a5af46d17f2a98f1cfd94f8f7d4609d0c1fd28c85a4b1ad7f2d5f9#/media?id=media14&ref=photoCollage>
* <https://www.rightmove.co.uk/house-prices/details/england-106246355-14525452?s=9b3a6e41b14588a8e53ea0090a974de72e6748e58e680bb677c69a05303bce02#/media?id=media2&ref=photoCollage>

The extent of the proposed eastern elevation with no variation in height or elevational articulation (see visual as proposed in D&A Statement, p.30) would have an overbearing and dominant presence, and would be expected to overshadow the terrace by blocking natural sunlight from the west through the afternoons and early evenings. It is intended to screen views of development with the planting of trees to reach 12-18m (see proposed Section C-C), but the success of this would be dependent on an effective strategy of maintenance to ensure the trees take and thrive, and the selection of species that would do well within this over-shaded location. Views of the development would be maintained for a long time whilst the saplings grow to maturity. In accordance with Policy D6, development should “allow existing and proposed development to achieve appropriate levels of privacy, outlook and natural light” and should not result in significant harm to the amenity of existing residents. We therefore maintain that this development would not provide for appropriate levels of residential amenity and would have an adverse impact on the residents of Lorne Road. The development of what is essentially an oversized warehouse-style structure within such close proximity of a residential boundary is not considered to be appropriate, or justified by the applicant’s cited floorspace requirements.

The visuals included under Appendix D also indicate that the proposed building’s shoulder and roof would be visible in views of the Oldfield Park Infant School and appear as a heavy insertion in what has otherwise been retained as glimpsed views of the treeline over the School’s historic pitched roof. The overall effect is of the cumulative build-up of the setting of a retained, interconnected buildings of historic and aesthetic interest, and resulting harm to their setting and relationship.

BPT continues to call for new development of a design quality that reflects and responds to Bath’s locally distinctive character whilst also seeking to address evidenced local issues. This is a site where there is a clear disparity between the need to retain and reuse Bath’s existing industrial premises to drive economic growth whilst accounting for its tight residential grain, and development offers an opportunity to address these problems through clever and innovative design. We are therefore disappointed to see the submission of a bland, standardised scheme which clearly seeks to maximise the usable floorspace of the development and associated profit without proper consideration of impact on local character or amenity.

Simply because revised proposals now seek to retain the industrial use of the site does not implicitly make this scheme more acceptable than what has previously been submitted, and we therefore maintain our objections on grounds of excessive height, scale, and massing resulting in proposed overdevelopment of the site, and failure to respond to local distinctiveness or townscape character due to its utilitarian, ‘anywhere’ design. The proposed development by virtue of its inappropriate appearance, materials, height and form would detract from the setting of multiple heritage assets including the conservation area and listed buildings including 1-27 Victoria Buildings, 1-6 Park View, 30-32 Belvoir Castle. The development would therefore be contrary to Section 12 of the NPPF, and Policies B1, B4, BD1, CP6, D1, D2, D3, D5, D6, and HE1 of the Core Strategy and Placemaking Plan and should be refused or withdrawn.