



Stadium for Bath - Round 2 Consultation

The Bath Preservation Trust was set up in 1934 to safeguard the historic city of Bath. Bath is a UNESCO World Heritage Site, and the only complete city in the UK afforded World Heritage Status.¹

As with previous responses (see <http://www.bath-preservation-trust.org.uk/project/therec/>) this response represents our informal feedback to the consultation on the development in response to publicly presented designs and illustrations. We reserve the right to amend our position when we respond formally to a planning application.

Summary of this (January 2019) response:

- The scheme has made progress but we believe there are significant challenges and inconsistencies with current concepts as presented.
- With the caveat that there are as yet no verified LVIA views (Landscape Visual Impact Assessments) by which to judge the proposal as yet, we remain concerned about the potential harm created by the absolute height of the East and West Stands resulting in the apparent almost total loss of views from Grand Parade to the hills and terraces of Bathwick and Claverton, and loss of the view of the Abbey from Bathwick. This is compounded by the lack of a significant gap or mediation of the height at the North West corner of the West Stand to create a substantial through-view.
- Given concerns about height, we seek greater clarity about whether the additional height created by the void for the car park/flood capacity is necessary for a functional sports stadium, or whether it is primarily for revenue generation and the creation of the market area.
- We are unconvinced, in current market conditions, as to whether Bath or its visitors has the population to sustain the market hall idea without adversely impacting on the economic benefit to Bath of Bath Rugby's presence in the city.

¹ The purposes of the Trust are:

- to encourage and support the conservation, evolution and enhancement of Bath and its environs within a framework appropriate both to its historic setting and its sustainable future, and

- to provide educational resources, including museums, which focus on the architectural and historic importance of the city.

The Trust receives no statutory funding and is supported by visitor income, grants, legacies, donations and around 1400 members who share a passion for the city and its environs.

The Trust also runs four Accredited museums in Bath and has the support of over 200 volunteers.

- We would like to see a developing dialogue of what constitutes the genuine PUBLIC benefit to mitigate harm.

Background to our response

Points maintained in relation to previous consultation:

1. We strongly support riverside regeneration.
2. The landscaping of the 'Rec-side' riverbank needs to have an identity that relates to the World Heritage Site public realm.
3. Public benefit must be made clear **and guaranteed** within the planning application and benefits outside of the control of Bath Rugby should not be factored in as compensatory public benefit to outweigh harm.
4. The design approach should be justified with a clear 'design journey' that considers/discounts other options.
5. Concern about colonnade/archway approach.
6. The upper levels of the West Stand in particular, must not be allowed to dominate the design of that area and compromise the need for some visual transparency of the stadium to the hills beyond and the creation of sightlines and eyecatcher 'gaps' in the structure.
7. A car park should only get permission if INDEPENDENT modelling suggests its net impact is neutral or positive on the City Centre.
8. Concerns about the apparent proximity of the new East Stand to the listed Cricket Pavilion.
9. The East Stand as it faces the Rec must not be a 'forgotten' elevation but should be designed positively in a landscape context.
10. Justification of a permanent east stand requires greater understanding of what the availability of permanent facilities and spaces for use by the community and the charitable sector might represent.

General Principles

The Trust's position on the principle of development on the Rec has always been clear. We are open to the opportunities for a new stadium on the Rec and regeneration of the riverside, and recognise the economic benefit rugby on the Rec brings to the city centre and we acknowledge the longstanding historic association of Bath Rugby to this site. However, in relation to our charitable objects, our primary focus will be the protection of the Outstanding Universal Value of the World Heritage Site and its positive development to PUBLIC benefit, together with the impact/s any structure would have on Bath, its heritage and its landscape setting.

We consider the impact of development, and assess any planning application in the context of local and national planning policies, its effect on the character and appearance of the Bath City-wide conservation area, Bath's local distinctiveness, the setting and views of significant heritage assets (including the World Heritage Site), and the attributes that contribute to the Outstanding Universal Value of the World Heritage Site.

It is likely that the planning application will need to acknowledge change and identify the concept of HARM to heritage assets and OUV as well as describing how those assets are CONSERVED and ENHANCED by the development. In the case of the Rec, the listed cricket pavilion and the so-called Lime Kiln are the only directly affected assets on site, but the concept of harm/enhancement extends to the protection of views to and from significant heritage assets and the criteria of Outstanding Universal Value in relation to the WHS. The application should in due course present a clear methodology for assessing the heritage impact and the criteria for a visual impact assessment, and clearly state any mitigation of adverse impacts.

We will not be in a position to properly assess the impact and effect of proposed development until we have sight of the Landscape and Visual Impact Assessment (LVIA).

Setting and Views

Bath Preservation Trust, in **A View of the Rec 2018** has identified a number of important views within the city which identify the relationship between the townscape and landscape, which is integral to the OUV of the World Heritage Site.

The development presents a prominent and visible building that will impact on views of the historic landscape and will change the experience of the World Heritage Site and its setting and the perceived openness of the Rec.

We consider that a key view - perhaps the most viewed scene - affected by the proposed stadium is the view from Grand Parade and Terrace Walk across the Rec, eastward facing towards the listed buildings of Georgian Bathwick and the wooded hillsides of Bathampton Down and Bathwick Wood. This view is panoramic, comprising of a sequence of related and dynamic views from along Grand Parade towards North Parade. BPT considers the significance of this view to be very high. It is an example of the integration of architecture and landscape setting (OUV Criterion 1); the city in the landscape, unifying with nature (OUV Criterion [ii]), and the integration of landscape with the Georgian town (OUV Criterion [iv]).

The development creates a new close-up and midrange view of the proposed stadium. We acknowledge the existing presence of the current low quality West Stand but because of the significant increase in height of the new stands that would significantly interrupt the scenic qualities of the current view, intrude on the visibility of the integration of the Georgian terraces of Bathwick with the landscape, and arguably harm the experience and enjoyment of the city in a green bowl. At the moment we do not see any attempt to mitigate this harm by creating gaps or visually permeable areas of the West and East facades. Nor are we convinced that the totality of this façade design is yet of sufficient interest to justify its obscuring of the landscape.

We are also concerned about the impact of heights on the west facing views towards the Grade I listed Abbey.

The 'easiest' mitigation for this harm could be achieved by a reduction in height, and by tapering down the height of the west stand as it approaches the Johnstone Street end to create a gap and open out views through to the city and landscape in the distance.

Height and Massing

Despite the reduction in the height of the development since the previous consultation, which we welcome, the exhibition appeared not to show illustrative views which address the appearance of height when facing on to the new West stand. We remain very concerned about the height in the absence of any LVIA. We would recommend that the LVIA is supported by ‘overlays’ that can be held up at specific viewpoints. We would also encourage the use of tethered balloons located at a number of points on a still day to provide a better understanding of the impact of heights of facades in the view and setting. Ideally we would like to see a partial scaffold frame erected in situ to observe the outline in three dimensions.

We welcome that this iteration has shown a reduction in height to the west stand in relation to the height of Grade I listed Johnstone Street, and are pleased that the iconic view of the abrupt termination of the Johnstone Street terraces is clearly visible at least from within the stadium (though note that the view has been lost from the Rec itself).

We are concerned about the impact of height and volume of the East stand on the setting of the open green space of the Rec, and the experience of this open green space. This elevation needs to be less overbearing; its overall design is discussed further below.

We do not believe that the consultations to date have made clear the motivation and requirement for the car parking and the market area, given the impact that creating a 4.7m high void has on stand height. It is imperative to understand and differentiate between the various factors in play:

- What does the flood requirement necessitate (and is 1:100 level too high a threshold?)
- What is the lowest threshold for the pitch to be elevated to get the benefit of a non-flooding hybrid pitch usable by the community?
- Is the car parking necessary for the Stadium, or just a financially ‘nice to have’?
- Is the 4.7m driven by the 1:100 or the size of a coach?
- Could a reduction in the height of the car park level, and/or the omission of parking provide adequate flood mitigation?
- Is the impetus for the car park coming from the Council to fulfil their parking strategy?

We would welcome the greater transparency about the drivers for the car park in order to understand whether or not it constitutes public benefit.

Design and Form

A balance must be struck between development that is outstanding in quality and yet recessive enough to allow for the heritage landscape to be conserved and enhanced. While the design proposed is subtle and to some extent fulfils this objective by virtue of its understated nature - it could ‘talk’ a little bit more than it does.

We feel that an opportunity has been missed for playfulness that supports the intention for recreation and that the general appearance should be one that is more joyful.

The opportunities for this in our opinion lie in the detailing of the facades, the whole of the external appearance of the East stand, and the treatment of the corners.

West stand

While we recognise that the design reflects the rhythm and repetition evident in the architecture of the Georgian city we feel that over such an expansive length of façade the current approach delivers a rather monotonous appearance. By contrast, the monumental façade of the Royal Crescent, for example, shows subtle variation to achieve a sense of movement. Similar subtle variation of the intercolumniation could produce the visual effect such as that displayed by the Royal Crescent which appears narrower at the ends becoming wider in the centre.

At the current development of the design, without proper elevational drawings it is not possible to understand the potential for this sort of change. There is also inconsistency between the different drawings presented in the exhibition.

We have reservations about the curvature of the archways which does not appear to be a form that is characteristic of Bath. It appears too shallow. It would be helpful to understand what lies behind the determination of the form and whether there is reference to, e.g. Pulteney Bridge arches.

Given our concerns about the use of reconstituted stone (below) and a preference for real stone used in a structural way rather than as cladding we would encourage an approach to the form of the lower tier that more honestly reflects the materials. The performance and suitability of materials may ultimately dictate the form.

While we maintain concerns that the colonnade on the first floor could appear too heavy, we recognise that subtle broadening of the pillars on the ground floor could help create a more grounded building.

East Stand

This façade faces a more rural hinterland and will be the backdrop to public ‘play’ on the Recreation Ground. It is the façade with most opportunity for idiosyncrasy, personality and playfulness. Whilst we have been informed that the design intention is that the two stands should be part of a ‘family’ we would suggest it be ‘brother and sister’ rather than ‘twins’.

We recognise that this is still a work in progress; however, we cannot support the current design. The elevation, on this scale, is dull; too solid, and too much of a concourse, and needs to have a more considered articulation and relationship with the green setting, which contributes to the setting of grade I listed Great Pulteney Street.

The application will need to be recognised that a building of this size in this location has the potential to effect the setting of, and would alter the public experience of the Abbey, Great Pulteney Street (rear panorama) and the cricket pavilion.

We are concerned that there is too much squeeze on the listed cricket pavilion, and that this should be considered for repositioning so as to have a dedicated axis in relation to the green space it faces.

We therefore consider that the design in its current form would fail to enhance, or make a positive contribution to, the setting of Great Pulteney Street and the setting of the cricket pavilion, and the setting of the Abbey in views west.

Corners

We do not feel that the design as proposed presents effective or attractive design solutions for the corners. Sharp right angles as seen in this design are not in keeping with the character of this part of Bath where abrupt endings tend only to be a result of terminations and unfinished terraces.

In Bath the existing historic corners are not generally angular, rather they move the eye and people around the corner. This can clearly be seen in the site plan, looking at the corners (at Laura Place) of Johnstone Street and of the colonnades opposite. We would like to see this characteristic reflected in the design, not least because this offers a substantial opportunity for addressing other concerns: visual permeability of the building, the creation of a more enticing and attractive approach from all sides; the breaking up of rectilinear 'slab' facades.

The NW corner in the view from Grand Parade, close to the Beazer Maze, presents a particular opportunity for a design that is interesting for the city; something that is engaging and enticing to look at and draws the eye and the visitor in while also opening up the view through this corner, especially from Grand Parade and Pulteney Bridge.

The void on the SE corner seems incongruous and incomplete - and a fairly hostile environment for the public.

The NE corner closest to the cricket pavilion needs to respond better to its context and positively enhance the setting of the pavilion.

Roof

We would expect as part of the design that the massing of the roofscape be further articulated in order to mitigate the impact of such a large expanse roof in views across the city.

Given the existing challenges relating to height, we have a strong objection to the roof mounted floodlighting and encourage an alternative solution. Could they be retractable? They are likely to be visible and intrusive in any views across to the skyline.

Materials

We do not support the use of pre-cast stone, which will contrast and weather badly. We are not opposed to the principle of using new materials; however there is a difference between 'honest' new materials such as the pierced metal on the one hand, and artificial material attempting to 'look like' Bath stone. We feel that if there is a stone element it should be natural stone as this gives a stronger connection to the character of Bath and its OUV and literally 'grounds' the lower storey. We prefer that stone should not be used as a cladding material and should be used structurally.

While we appreciate the lightness and transparency that glazing gives to the upper levels we have concerns about lighting and light spill from the “halo” and concerns about light spill from the West elevation. We would expect the planning application to show day and night light spill. We would welcome the upper floor being fully transparent east-west to mitigate the height.

We would like to see greater clarity in the use of roofing materials, the colour and finish of the zinc and the detail of any integrated solar panels.

Materials need to be resolved prior to submission of the application as this site is too important to leave any materials to be Conditioned within the planning approval.

If any materials are left to condition we would expect that Historic England is to be consulted before any discharge of Conditions in relation to materials.

Radial Gate

We strongly support the removal of the radial gate in principle, subject to the impact on Bath’s flood remediation, as it is an eyesore and its removal offers the opportunity for substantial enhancement of this section of the river corridor. We would welcome seeing the consultation response from the Environment Agency.

Access

The principle of having an access ramp off the North Parade Bridge is broadly supported, and there is some opportunity to improve the setting of the listed lodge and viaduct. However we need more detail of exact landing points, design and materials to assess the impact on listed structures here and their setting.

The demolition of part of the 1910 Bath Pavilion will also require a heritage impact assessment that takes into account the impact on the significance of that building, in particular its community significance as an Edwardian roller skating rink and as a live music venue especially in the 1960s.

Over the entire development, we would appreciate greater clarity in what parts of the development are publicly accessible, which routes are open, where there is access at all times, and where there is not; including how security and safety will be managed after dark.

Carpark and Market Hall

There are two proposed aspects of the scheme which seem to drive the increase in height; the carpark and the market hall. The height issue is dealt with elsewhere in this response: here we consider the need for the other facilities.

The first is the ‘market hall’ space and the second is the car park. We recognise that matchday crowds must be fed and watered, but do not see the need in the City for retail facilities beyond this and outside match days. The current options draft of the Local Plan does not see a requirement for significant extra retail, so any permanent retail in this site would be competitive to the city centre rather than complementary. Substantial evidence would therefore need to be shown to justify the market hall as a public benefit. We are

also suspicious of the comparators like Camden Lock and Spitalfields; comparators to London simply don't reflect Bath's market - the population of Camden (home of Camden Lock) alone is more than double that of Bath.

In relation to the car park, we can see that there may be some traffic benefits to the city centre. However we remain of the view that a car park should only get permission if INDEPENDENT modelling suggests its net impact is neutral or positive on the City Centre, and that Cleveland and North Parade Bridges will be able to accommodate the traffic. In addition, any public benefits of any car parking revenue need to be quantified and guaranteed. The same applies to coach parking. Though we recognise that removal of coach parking from Bog Island would be beneficial, there would need to be guarantees that the provision was 'instead of' rather than 'in addition to' existing city centre drop off facilities.

Landscaping

Detailed place-making design for the public realm (riverside 'room') and linkages (north and south as well as south, and on the East side) will be required for the full application as this site is too important to leave landscaping details to be Conditioned by any planning approval.

Given the likely removal of the majority of the mature trees on site, we would wish to see semi-mature trees in the landscaping proposals. While the trees mature, consideration may need to be given to the mitigation of lightspill.

We note that there has been no reference either to anti-terrorism protection or river safety, which both need to be built in to overall design.

Sustainability

There seems little recognition of sustainability in design and would encourage the medium and high forms of sustainable energy referred to in the exhibition bedesigned and built-in. We would consider rainwater harvesting to be a sensible possibility across a roof of this size and for a building with lots of toilets. We would expect to see lights which switch off automatically at certain times of day/levels of usage to minimise lightspill.

Public benefit

Public benefits as defined in the NPPF could be anything that delivers economic, social or environmental progress. Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. It is therefore crucial in understanding whether any harm is acceptable to begin to understand which of the benefits of the stadium are truly public benefits rather than private benefits. We would appreciate therefore that the next public consultation starts to set out the understanding both of harm and public benefit in relation to this proposal.

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