

Chris Griggs-Trevarthen  
Planning Department  
Bath & North East Somerset Council,  
Bath, BA1 1JG  
*By email*

19th<sup>h</sup> January 2023

Dear Mr Griggs-Trevarthen

**Bath Western Riverside application for Former Gasworks, Windsor Bridge Road, Bath [c](#)**

1. ICOMOS-UK is writing to express strong concerns about the development proposals submitted for the former Gas works site of the Bath Western Riverside (BWR) project – application 22/03224/EFUL.
2. We consider that the proposals set out in the above application have failed to take account of constraints needed for the development of this area of the City of Bath World Heritage site, as set out in the ICOMOS/UNESCO Reactive Monitoring Mission report of 2008 and the subsequent recommendations of the UNESCO World Heritage Committee in 2009. As a result, in our view, the proposals will have a highly negative impact on the Outstanding Universal Value (OUV) of the World Heritage site for the reasons we set out below.
3. The BWR area is in the bowl of the valley alongside the river and highly visible from higher parts of the city. The 2008 Reactive Monitoring Mission was undertaken in response to concerns about the potential impact on OUV of the first phase of the BWR project in the centre of the World Heritage property which was approved in spite of many objections and without a Public Inquiry.
4. The mission report acknowledged the justification for developing a new urban quarter in the BWR but it recommended that the second and third ‘phases’ of the development be amended to reduce *‘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, and so as not to add a new barrier within the Northern and Southern parts of the City (as it currently is in the proposal the mission reviewed)’*.
5. In 2009, the World Heritage Committee confirmed this recommendation in decision 33 COM 7B.131 when it urged 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’.*

6. In its response to the Mission, the State Party reported to UNESCO that this could not be done within the UK Planning system as *‘the Council has no specific power to require the submission of the revised plans that the Mission’s suggestion would necessitate.’* It remains unclear why revised plans for further phases could not be submitted for review.
7. As no revised plans have been submitted, no further reviews have been undertaken by ICOMOS or the World Heritage Centre. However, in its response to the mission report, Bath and North East Somerset (BaNES) Council, did state that they would *‘take every opportunity to work with developers in order to optimise the form and quality of the later phases of the development’*. It also made mention of The Building Height Strategy (2010) and the Setting Study SPD (2009) as demonstrating the Council’s commitment to protection and stewardship of the WHS and its OUV following the mission. We note that the Building Height Strategy has not yet been adopted as an SPD as originally planned.
8. Notwithstanding the commitment of the Council to respect the recommendations of the Mission and the World Heritage Committee, the current proposal for the gas works site does not in any way reflect these recommendations or even the constraints that are in place for the BWR site. The plans do not respect the Building Height Strategy which recommends four storeys on the valley floor and exceptionally six storeys, nor the Master Plan of 2008. And critically, nor can it be said to support the OUV of the property through the design, form and materials of its architecture and its landscape planning.
9. It is now a mandatory requirement in UNESCO’S Operational Guidelines for the Implementation of the World Heritage Convention for Heritage Impact Assessments (HIAs) to be undertaken in line with formal Guidance, (para118bis) introduced in 2021. However, in this case, no HIA has been undertaken that could have set out a formal appraisal of the impact of the proposals on the attributes of OUV. All that has been submitted is a Visual Impact Assessment which is insufficient. The attributes of OUV go beyond the idea of development being seen from certain viewpoints to encompass the spatial relationships of the city and how buildings relate to green spaces.
10. It is our view that this submission is both extremely disappointing and inexplicable, particularly when so much effort has gone into the Management Plan for the City of Bath WHS and the new interpretation centre. Given such strong commitments by the Council to promote well planned sustainable development that respects OUV, this BWR submission in no way fulfils those commitments or aspirations and would only result in a considerable adverse impact on the OUV of the WHS. Furthermore, the plans are not in line and do not conform with the Master Plan (2008) for BWR or with the Bath Building Heights Strategy, and cannot be said to take account of the recommendations of the 2008 Reactive Monitoring Mission report or the recommendations of the World Heritage Committee in 2009.
11. Bath was one of the inspirations for the Garden City movement – and it is essential that new development within it should reinforce its key characteristics, not weaken them. The

submitted plans do not respect the need for the development of BWR to support the OUV of the property, through architecture of high value fully integrated into '*the city's strong visual coherence and its wider setting*'. Instead what has been submitted is 'anywhere architecture' whose form, massing, density and height overload the site. The scheme certainly cannot be construed as a sympathetic development that respects its landscape setting. We consider that the proposed plans if implemented would have a highly damaging impact on the OUV of the city of Bath. Furthermore if such development were to set a standard for the remaining development of BWR and elsewhere within the WHS, cumulatively the negative impact could reach highly damaging levels that might ultimately be considered as a threat to the City of Bath's World Heritage status.

12. In conclusion, we consider that the planning application, as submitted, should not be consented. We also consider that as a matter of urgency an overall Brief for the BWR needs to be defined and fully reviewed through an appropriate HIA for its impact on OUV, before further detailed designs are developed for both buildings and landscapes. The BWR should be seen as opportunity to demonstrate how development can meet the needs of residents and can reflect high standards of design (as part of phase 1 has done). It should also sit harmoniously within its landscape, and provide visually pleasing and environmentally beneficial green areas to maintain and complement the OUV of the City – none of which are met by the current monumental, oversized dense blocks of the current scheme.

Yours sincerely

**Peter Marsden**  
**Chair ICOMOS-UK World Heritage Committee**