

Application Number: 10/04867/FUL

Address:

Kingsmead House
James Street West
Bath BA1 2DG

Proposal:

Erection of a 190 bed hotel incorporating conference facilities, restaurant, cafe/ bar and associated facilities, servicing and works following demolition of Kingsmead House

Comments: submitted at 24/01/2011

Bath Heritage Watchdog **strongly** objects to these proposals.

These comments relate to both the CA & FUL Applications

Introduction

These are a disappointing set of proposals for a number of reasons.

Disappointing because despite the proposed demolition of one of Baths worst reminders of the 'packing case' style favoured in the 'Sack of Bath' and one of the most visible blots on the city, its proposed replacement is little better in its architectural treatment.

Disappointing that after universal scorn was heaped on the designs for the Western Riverside we are presented here with a basically similar approach in a style not that far removed from that of the Western Riverside. There are considerable similarities with structures in London and with the town hall in Murcia, Spain. It has no "Bathness".

Disappointing that the local voices that understand what can be termed as 'Bathness' have been ignored.

Disappointing from a consultation approach, because the resultant design is probably worse than those shown on the display boards. The public consultation document is "Tick Box" oriented and pays virtually no attention to suggestions made by the public.

Disappointing because the architects have failed to understand the location and its character and the added impact of a corner location and have responded to it with a design that overwhelms its surroundings with its scale and mass and height.

Disappointing that yet again this is an isolated development approach when a cohesive master planning approach is what is required.

Disappointing in that once again Bath has been failed. Here is a unique opportunity to replace something bad with something good. As buildings that were erected during the "Sack of Bath" reach the end of their life, there is an opportunity to repair the damage that was caused to the townscape. We feel that opportunity has been missed.

Conservation Area

Despite the standard of some of the surrounding structures, this is a Conservation Areas and the applicable local and national policies must apply. We would not wish to see Conservation Area consent hurriedly granted to see the back of the current building without a superior replacement. In their current form we feel the proposals are sadly lacking.

The legislation on demolition of buildings in a Conservation Area.

The Planning (Listed Buildings and Conservation Areas) Act 1990 says:

74.—(1) A building in a conservation area shall not be demolished without the consent of the appropriate authority (in this Act referred to as "conservation area consent").

Section 74 States

17.—(1) Without prejudice to the generality of section 16(1), the conditions subject to which listed building consent may be granted may include conditions with respect to—

- (a) the preservation of particular features of the building, either as part of it or after severance from it;*
 - (b) the making good, after the works are completed, of any damage caused to the building by the works;*
 - (c) the reconstruction of the building or any part of it following the execution of any works, with the use of original materials so far as practicable and with such alterations of the interior of the building as may be specified in the conditions.*
- (2) A condition may also be imposed requiring specified details of the works (whether or not set out in the application) to be approved subsequently by the local planning authority or, in the case of consent granted by the Secretary of State, specifying whether such details are to be approved by the local planning authority or by him.*
- (3). Listed building consent for the demolition of a listed building may be granted subject to a condition that the building shall not be demolished before—***
- (a) a contract for the carrying out of works of redevelopment of the site has been made; and***
 - (b) planning permission has been granted for the redevelopment for which the contract provides.***

Section 3 marked in bold is the clause we believe should be applied here.

Although there is no objection in principle to the demolition of the existing structure the proposals in their current form are unacceptable. We believe demolition consent should be refused or withheld until acceptable plans are in place.

Kingsmead House

Kingsmead House was once part of the brave new world of architecture which in the case of Bath involved the destruction of perfectly usable or repairable structures some of great architectural merit and the replacement with in some cases slab-sided monolithic structures as here or series of uniform houses dubbed 'chicken coops'. Kingmead House formed part of the central group of 'packing case' showpieces and along with what is now the Hilton Hotel gained notoriety from its height and its sheer cliff like walls. It has served as a reminder of this failed contemporary approach for decades. Its appearance is not the reason for its deterioration as is claimed. We understand its inner structure is coming to the end of its useful life therefore demolition may be the only option within a decade. This also raises the question of sustainability.

These proposals will see the demolition of a steel and concrete framed building with cladding panels of less than 50 years in age being replaced with something of largely the same construction and probably the same life span. Demolition of the existing and construction/materials of the new will result in the use of high embodied energy while across the road more modest structures built from the ground up in locally sourced materials will outlive them both. The issues of sustainability and construction methods along with the use of local materials and workforce should be key drivers of any new developments in Bath. We must be promoting new buildings with a 100 year plus life span not at an endless cycle of build, knock down, etc which leaves Bath under the spectre of becoming a permanent construction site. If every tourist photograph has tower cranes in the background, the attraction of Bath will be severely diminished.

Consultation

We were somewhat surprised by the sudden appearance of these proposals and feel the consultation was somewhat perfunctory: although it was spread over two days we feel advertising was limited. The numbers attending seem to back this up. Group members attended both days. Our feedback gives a different opinion to the applicants with the main criticism levelled at the design. We submitted some four pages of comment mostly about the elevational treatment. We also provided historical pictures and information in the hope of aiding the process as during the presentations those present seemed to be lacking in knowledge and understanding of the area and the context of the city. It is felt that this lack of knowledge and understanding has led to the design proposed.

We were promised a further public consultation before the application was submitted in order to assimilate feedback, this never took place.

We note mention of a number of consultations with the local authority and English Heritage. We believe details of these consultations should be provided as they appear to have influenced the design. There are clear indicators once again of a favoured design approach being adopted by the local authority. This is warned against in PPS1.

English Heritage as they have been previously involved should not refer the application back to the case officer as the application involves the demolition of a major structure and the construction of another that affect the character of the area. We would urge the case officer to inform them of this and urge them to comment.

Master-planning

Again the lack of a cohesive master plan for the area raises concern. We simply cannot have this continued piecemeal development without one. Once again all the familiar buzz-words are used: a 'new gateway' and a new 'contemporary intervention' in the historic core yet the building will look isolated from its surroundings. The only grand or landmark building is and should remain Green Park Station. No detail is given as to how this will integrate into what is now termed (without proper explanation) as 'the hierarchy of streets' It does not fit in at all with the current built form (being even at odds with the more angular Plymouth House) and its visual mass is emphasised by it being set forward. It lacks the intimate human scale that previously existed, and the demolition of an oversized building cannot be used to justify an oversized building in its place. The height is at least a storey too tall: four storeys (one being below pavement level at the front) plus mansard should be the norm, and the storeys must not be excessively tall compared to the surrounding (mostly listed) buildings. Scale and mass are far too bulky and are more a barrier than a gateway. Western Riverside mentality seems prevalent here with the same sort of layout

appearing over and over again. There is though a suspicion this is exactly what is intended. This assumption would go a long way to understanding the design approach adopted.

Design Approach

Unfortunately it appears site character and context are based on the existing building, the buildings behind it and heading towards the city centre. The key building is and must remain Green Park Station with its monumental façade. Character of the area should be based on historic context. Height, scale and massing should compliment and respect the heritage assets. Note how the original building formed an homogenous whole. The building heights of Charles Street being similar to Green Park Station. The individual character of each building and the varied roofscape adding variety and rhythm to the whole. Note also how the corner is terminated.

It was clear from the outset that the architects were determined to adopt an overtly contemporary approach and while contemporary designs are not ruled out there is considerable justification here for an approach more sympathetic to the historical neighbours; not so much exact replication more an interpretation based on the varied forms, height, roofline and most importantly proportions.

The applicants no doubt were pushed by those consulted in the local authority towards the final result chosen, with them frequently raising the words of the UNESCO Vienna Memorandum on contemporary architecture in World Heritage Sites.

It has this to say that is considered relevant to these proposals. Key points emboldened

*A deep understanding of the history, culture and architecture of place, as opposed to **object buildings** only, is crucial to the development of a conservation framework and single architectural commissions should be informed by urbanism and its tools for analyses of typologies and morphologies.*

*Ethic standards and a demand for high-quality design and execution, **sensitive to the cultural-historic context, are prerequisites for the planning process. Architecture of quality in historic areas should give proper consideration to the given scales, particularly with reference to building volumes and heights. It is important for new development to minimize direct impacts on important historic elements, such as significant structures or archaeological deposits.***

Townscapes, roofscapes, main visual axes, building plots and types are integral parts of the identity of the historic urban landscape. With regard to renewal, the historic roofs cape and the original building plots serve as the basis for planning and design.

*As a general principle, **proportion and design must fit into the particular type of historic pattern and architecture, while removing the core of building stock worthy of protection***

*Special care should be taken to ensure that the development of contemporary architecture in World Heritage cities is **complementary to values of the historic urban landscape and remains within limits in order not to compromise the historic nature of the city.***

Although it is against what it terms pseudo historical replication the local authority's own Draft Core Strategy says there are cases where this could be considered to restore a set piece. It should be considered here at least for Charles Street. Remember it was the local authority that demolished the buildings that occupied the Kingsmead House site in the first place!

Possibly the worst aspect is the physical resemblance to the Western Riverside proposals with its repetitive facades off-set and distinctly uncharacteristic window spacings combined with dull expanses of zinc roofs and over-scaled dormers. A side by side comparison of the elevation section show remarkable similarities. It is this that gives the overriding impression there is an undeclared Bath design code.

It is stated the applicants studied in great detail recent developments in order to aid the design. Design should be based on local character and context not just recent developments, and as the memorandum says “*Architecture of quality in historic areas should give proper consideration to the given scales, particularly with reference to building volumes and heights*” and “*proportion and design must fit into the particular type of historic pattern and architecture*”.

Impact on Distant Views

The applicants have correctly assessed the impact on the distant views. The most popular viewpoint possible any structure on this site will be visible from is Beechen Cliff. The current structure’s monolithic appearance and height makes it prominent. In the impact on views the prime indicator of this proposal will be the roofscape. These vast areas of unbroken roofs are unsuccessful. The cinema complex, Snow Hill and Southgate testify to that. Note the importance the memorandum places on roofscape. Stand on Beechen Cliff to look at all the structures that stand out and look odd. They are either too tall, have odd window proportions/spacing or the roofline is poor. This has all three! Although there are worse examples, this building won't fit in.

Impact on Heritage Assets/Conservation Area

This will be far greater. The new proposals although lower in height will still impact. It will still overwhelm the remaining terraces of Charles Street and the entrance to Green Park Station by virtue of its unrelenting, unbroken curtain wall of an uncharacteristic form. It will also impact on New King Street by virtue of its greater mass. The impact on the Conservation Area will be similar; the smaller structures opposite on James Street dwarfed by this bludgeoning mass. Further impact on the wider Conservation Area will come from the alien form of a greater ratio of glass to stone and materials not appropriate for a Conservation Area.

In order for Conservation Area consent to be granted it must be proved that any new structure has a positive benefit. Perhaps the hope is the fact the current structure must be top of the charts for removal, so there could be a presumption that anything else therefore is better. But it isn't, and replacing an unloved building with a short residual life with an unloved building with a longer residual life is not by any stretch of the imagination a positive benefit.

The Proposals

A tall monolithic but slim line packing case whose main core is a far smaller footprint is to be demolished to make way for a lower but more capacious case whose overall height, scale, mass and bulk occupying the whole corner.

The chosen style is the Western Riverside approach of a unbroken wall with a greater ratio of glass to solid, with windows of odd spacings and proportions. The whole is topped off by a featureless zinc roof punctured by over-scaled dormers.

The whole mass is unbroken and poorly articulated. The only relief is the main entrance.

The height is too tall: four storeys plus roof is all that is required. It is possible that five storeys could be considered on the corner area but more of a feature, complementing Green Park Station on the diagonally opposite corner, should be made of this. Better proportions are required rather than the clear turning away from classical proportions combined with the need of distorted heights to include false ceilings for lighting and service runs.

The bulk and mass are considerable and there is no variety of form. There needs to be far greater articulation and set back of the main façade. We note the comparison streets chosen as indicators all which contain post war interventions which are uncharacteristic in scale and form and in some cases materials. None are hotels.

The window proportions are uncharacteristic as are the window spacings. There is no fenestration to the glazing. Look at Cambridge House for a current example of the impact of such "blind" windows.

The suspicion of an underlying design brief is further highlighted by the identical window pattern being promoted in future designs at the Treasure and Transform Exhibition. It may have been considered modern 25 years ago but outside Bath it is becoming ubiquitous and outdated.

The corner treatment is poor and if you look at the design influences chosen they are all forms deliberately chosen to justify the final form. Ignored are the Seven Dials, Sheepshanks House, The Forum, The Old Post Office, Churchill House even its replacement the Busometer. All make a feature of the corner. All the locations shown with the exception of the Guildhall are structures of a much smaller and individual nature. The architects' own visuals of a different corner treatment show what a relief it offers from the repetitive rhythm of the main façade even if the form proposed would not be considered appropriate. The examples of corner treatments shown in the documentation were all classical designs. It must be possible for a modern interpretation of this to be done. Study 05 shows what a degree of set back does to break up the visual bulk.

The roofline is dull and uninspiring with the dormers too large. One of the montages -Option 2 - showed a series of ridges and stacks that broke up the form but the planning application does not reflect this. Looking at the aerial photo was quite enlightening. Whilst the current buildings are very tall the fact that they are surrounded by plenty of space means the impact is lessened. The proposals need to be broken up, a variation in roof heights and either a slate or lead roof or a variety of both. We think standing seam zinc in such large amounts is unacceptable.

The rear elevations are weak and bear a remarkable similarity to the original designs of the Green Park Hotel as well as the Hotel on Brougham Hayes.

Materials

Again the choices are based on some strange examples, the majority of which go against the local character appraisals and local policies. Most belong to major projects where an "anything goes" attitude prevails regardless of the visual damage caused. This is normally backed by the Development Control Committee who normally disregard the aspects that should be ruled out by Supplementary Planning Documents. Render, aluminium, and glazed balustrades do not form part of the true local palette.

The high levels of glazing pose problems of reflectivity and light spill, two areas that the Vienna Memorandum say should be guarded against. The use of glazed balconies at such high levels over the public highway may well have Health & Safety implications.

We also picked up from the sustainability report the detail that the window reveals are to be 350mm. This is quite deep and will no doubt provide an artificial cliff for the local seagulls and pigeons. You will then need anti bird wiring to counteract this which isn't pretty and doesn't always work, and certainly won't enhance the view from inside a hotel room.

Landscape & Public Realm

Actual landscaping that benefits the public or adds open green space is non-existent and given the scale of the proposals this is surprising but we appreciate the nature of the proposal would seem to preclude this.

There is no particular objection to the materials for the public realm only to the fact that recent examples in Southgate, Milsom Place and Westgate Street show that either the quality of some of the materials is not up to the job or the standard of workmanship in laying it down is suspect. This area is too much used by the public for frequent repairs to be tolerated.

We would question too, the colonnade which although prevalent in Bath, that in Southgate shows it becomes nothing more than a covered eating and smoking area. As this would appear to be a public space rather than an area for guest use only we can envisage both public and guests using it as a smoking area along with frequent congestion from coach drop-offs. Concern is raised over the narrow turning space for service vehicles (which would have to turn against the oncoming traffic and pedestrians) on the paved surfaces and the close proximity of the piers of the colonnade.

Hotel

Given that the Core Strategy identifies this location for office use, there seems to be no council policy supporting a hotel. Hotels have far greater requirements for delivery vehicles both for residential and conference room facilities, and for customer arrivals and departures (whether by car, coach or taxi) than offices do, and this is a very busy corner for traffic already, so these transport considerations are important.

Transport

Although not strictly our remit, we once again question the lack of parking provision given we assume from the consultation discussions that this is a 3 or 4 star hotel. There is not even the option of a valet service taking your car to a secure parking area. The only options are by public transport or coach and taxi or on foot. Given the conference facilities etc, the apparent references to coach use seem to be at odds with the market the hotel seems to be aiming at.

There is only one bus stop, situated opposite for services from the bus station, but this serves mainly the local and frequently crowded routes (including the student run). The only park and ride service is from Newbridge which would preclude car use except that originating from the west. The only viable option from the station would be taxi which would arrive on the wrong side of the road by any of the shortest routes.

No mention is made of the Bus Rapid Transit which will run past the door (again from Newbridge); and to show how unfamiliar the applicants are with the road layout, cars are shown running in both directions on a one-way street, so any traffic analysis they might have made will be invalid.

Conclusion

The proposals in their current form are not acceptable and by virtue of its height, scale, mass and form combined with its uncharacteristic design elements and materials (detailed above) with have a detrimental and negative impact on the Conservation Area and the setting of listed buildings. The proposals are little improvement on that existing (therefore Conservation Area Consent should be withheld or refused) until such time that considerable improvements are submitted.

We remain concerned that there is an unofficial contemporary design code/pattern for Bath driving this design. In its current form both applications fail to comply with Policies BH1, BH2, BH6, BH7, D2, D4 and NE 1 of the Local Plan and with guidance in Policy PPS5 and should therefore be refused.