

Mr Geoff Webber
Planning Policy Team
Bath and North East Somerset Council
Trimbridge House
Trim Street
Bath BA1 2DP

22nd October 2007

Dear Mr Webber,

**BATH WESTERN RIVERSIDE, PHASE 1A Revised: CREST NICHOLSON
PROPOSED DEVELOPMENTS 06/04013/EFUL and 6/01733/EOUT**

ICOMOS-UK wishes to object to these proposed developments as set out in the revised drawings submitted by the applicant.

ICOMOS-UK

ICOMOS-UK is recognised by Government as having special status with regard to World Heritage sites. Its parent body, ICOMOS, is official advisor to UNESCO on cultural World Heritage sites, as set out in the World Heritage Convention.

Summary:

ICOMOS-UK objected to the first proposals for this site (considered by the Council in January 2007) for their adverse impact on the outstanding universal value of the World Heritage site.

We wish to object to these revised proposals on the same basic grounds – for their adverse impact on the Outstanding Universal Value of the site.

We consider that the current schemes, both the overall outline scheme and the full application of part of the site, could put the Bath World Heritage site status at risk and we believe that everything possible should be done to avoid that eventuality. A major development in a World Heritage site such as this must satisfy the World Heritage Committee, in line with the current Operational Guidelines of the World Heritage Convention; if it does not satisfy the Committee, they have the option of including Bath in the World Heritage List in Danger, something considered by the 31st meeting of the Committee in Christchurch in July this year for the Tower of London and Westminster, but avoided due to the adequate response from relevant local authorities.

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ICOMOS-UK wishes to stress that objection to this specific scheme is not objection to all development of the Western Riverside site. We remain supportive of any development on this site that respects the special qualities of the World Heritage site. But economic development cannot be at the expense of internationally important sites.

The proposed overall development site at Bath Western Riverside covers some 35ha and thus occupies the same footprint as the Royal Crescent, the Circus, Queens's Square, connecting streets, and some land to the south-west of these three great urban spaces, all combined. This huge development site is in the heart of the World Heritage site (WHS), not outside it as suggested by Sir Richard MacCormack's report (commissioned by English Heritage). We consider that such a large and sensitive site in a WHS needs to be appraised to the highest possible standards and at the highest possible level. This is true both for the overall outline application and the detailed application for part of the site.

World Heritage Convention Operational Guidelines

The UNESCO World Heritage Convention Operational Guidelines spell out clearly the need for State Parties to inform the UNESCO World Heritage Committee of any major planning process which might impact on the OUV for which a WHS was inscribed. ICOMOS-UK considers that development of the Western Riverside constitutes a major devolvement within the Bath WHS and as such should be reported to the UNESCO World Heritage Committee, before any decision has been taken which is irreversible. It is essential that major development within Bath should satisfy the UNESCO World Heritage Committee as failure to do so, could leave Bath vulnerable to the possible inclusion on the list of World Heritage in Danger. ICOMOS-UK considers that that eventuality should be avoided at all costs.

Outstanding Universal Value of WHS:

At the time of inscription on the World Heritage list, the City of Bath was considered to have outstanding universal value for a combination of the following cultural attributes (a summary of what is set out in the Management Plan):

- ◇ Bath's formal neoclassical Palladian terraces and squares reflect its deliberate design to make it one of the most beautiful cites of Europe, with architecture and landscape combined formally and harmoniously.
- ◇ The grandiose scale and conception of the public buildings, crescents, terraces and squares by John Wood, Ralph Allen and Adam, reflect both the profound influence of Palladio but also their success in relating his ideas to a picturesque aestheticism with buildings in a garden setting, linking the town to it surrounding green hills, villas and bridges around its margins.
- ◇ The remains of the Roman spa, Aqua Sulis, uncovered in 1755 underpinned Bath's re-birth in the 18th century as a fashionable spa with Royal patronage

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- ◇ The Roman baths, the mediaeval Cathedral, and the use of local honey-coloured quarried limestone unify the conception of the city and reflect two millennia of continuous development

Bath was inscribed on the World Heritage list on the basis of criteria (i), (ii) and (iv). The following is a summary of the justification for the use of these criteria, as set out in the Management Plan. Text in italics is part of the official text for each criterion, as set out in the Operational Guidelines.

Criterion (i):

Represents a masterpiece of human creative genius

Bath's grandiose neo-classical Palladian terraces and squares spread out over the hills of Bath, and set in its green valley are a demonstration par excellence of the integration of town planning and landscape and the deliberate creation of a beautiful city. Not only are individual buildings such as the Assembly Rooms, Pump Room, of great distinction but these are part of the larger overall city landscape which evolved over a century in a harmonious and logical way drawing together terraces, crescents and squares to reflect the precepts of Palladio tempered with picturesque aestheticism

Criterion (ii):

Exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town-planning or landscape design.

Bath exemplifies the 18th century move away from the inward-looking uniform street layouts of Renaissance cities which dominated through the 15th-17th centuries, towards the idea of planting cities in the landscape to achieve picturesque views and forms. This unifying of nature and city, seen throughout Bath, is perhaps best exemplified in the Royal Crescent (John Wood (Younger)) and Lansdown Crescent (John Palmer). Bath's urban and landscape spaces are created by the buildings that enclose them, providing a series of interlinked spaces that flow organically. The effect can also be seen when viewing the city as a whole in its wider landscape: its natural building material, organic layout and location in a hollow in the hills all combine to seat the city harmoniously in its landscape.

Criterion (iv):

Be an outstanding example of a type of building or architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history

Bath reflects two great eras in human history: Roman and Georgian. The Roman Baths and temple complex, together with the archaeological artefacts and remains of the Roman settlement, make a significant contribution to the understanding and appreciation of Roman social and religious society. The 18th century re-development is a unique example of outstanding urban architecture, spatial arrangement and social history. Bath exemplifies the main themes of the 18th century neoclassical city; the

monumentalisation of ordinary houses, the integration of landscape and town, and the creation and interlinking of urban spaces.

Sir Richard MacCormack in his report makes mention of some of these attributes but not all and seems to indicate that it is the Georgian terraces only that give Bath its OUV. The significance of Bath is clearly much wider.

Detailed Comments on Crest Nicholson Proposed Developments

The following comments on the proposed developments, both outline and full, consider their impact on the qualities for which Bath is inscribed as a WHS.

The Western Riverside site is within the WHS – not outside it. Most recently used as an industrial site, with gasworks and a variety of other industrial buildings, it had a service function for the rest of Bath and includes few structural as opposed to spatial elements of OUV. Clearing most of the site will not damage OUV; however building something on it that interrupts the spatial planning of Bath and impacts adversely on the qualities for which it was inscribed, will harm the OUV of the WHS.

Overall the planning of Bath is, in our view, characterised by a tight network of comparatively long streets, both curved and straight, complemented by wide open spaces, paved areas, formal parks and less formal green areas; by dominant facades; by noticeable corner buildings; by narrow units part of larger blocks with a verticality to the repetitive patterns of windows and doors; by grand tall terraces complemented by rows of more subservient buildings; by the sudden opening up of views; by the green backdrop of the surrounding landscapes; and by views from the upper to the lower parts of the city. It is not characterised by rigid, grid plan geometry but above all by the way its built form blends organically with the landscape to create a distinctive and beautiful garden city.

ICOMOS-UK considers that many of these characteristics should be used to guide the development of the Western Riverside site, but with the proviso that the development should complement rather than compete with or mimic the earlier heart of Bath.

We consider that a successful scheme should be landscape-oriented and derive spatial relationships from Georgian Bath. The development should allow a similar spaciousness of layout and adjacent small-scale density of land-use to the Royal Crescent, the Circus, Queen Square and associated streets and spaces which encompass a similar sized area, in order to be worthy of its wonderful location and relate to the OUV of the WHS. We do not consider that the proposed development achieves this.

Instead what is offered are high, slab blocks set in rigid layout along the south bank of the riverside, unrelated to existing routes, totally out of scale with the existing Georgian and Victorian terraces and without the permeability between inside and outside that terraces, rather than slab blocks, offer. The overall layout is, unfortunately, rather reminiscent of 1950s

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planning and looks, from the evidence available, as though it could produce dreary neighbourhoods.

One of the key characteristics of Bath, detailed in the Management Plan, is the use of Bath stone (stone and water are what Councillor Roger Symonds says, in the forward to the Management Plan, makes Bath distinctive). The current application shows some stone cladding but also large areas of off-white acrylic render, a colour and material that would not sit well in the Bath landscape, as well as glazed top stories that could be very reflective and prominent.

We consider that the bulk of the back to back blocks, and the rigid and rectangular spatial arrangements that are proposed, are out of sympathy with the harmonious and more organic spatial patterns that characterise much of the rest of the city. The proposed layout is largely unchanged from the first application, apart from blocks 1 and 2 becoming one block. ICOMOS-UK considers that this layout continues to provide an unappealing environment, unrelated to existing access routes, the contours of the valley and the views in and out of the rest of the city.

Furthermore, the proposed height of some of the structures, up to 8 and 9 stories, means that the development will intrude into Bath's skyline, cutting through the sloping profile of the city and detracting from its overall valley form. The development would be visible from many points in the city, and on the surrounding hills. We appreciate that the developer in revising their plans has reduced one 9 storey block to 6 storeys, five 7 storey blocks to 6 stories, and two 6 storey blocks to 5/6. Nevertheless we do not consider that this reduction has had a major effect on the overall impact of the scheme, two blocks remain at 8 stories and one at 9 stories and 15 at 6 stores, all of which will intrude into the landscape. Overall the height and scale of the development will intrude into the spatial planning of Bath, in terms of views from higher parts of the site and views across the landscape of the city.

In conclusion, ICOMOS-UK considers that the proposed scheme, in terms of layout, height and materials, would impacts adversely on the spatial layout of Bath and its views, both part of the OUV of the city, as well as being detrimental to its overall visual integrity.

We consider that any development of the Western Riverside should be based on a detailed Master Plan and an analysis of Bath's spatial planning, skyline and significant views. Such a plan must include a strategy for the height of buildings that would allow views within the site and views out of the site to be respected, and an analysis of the spatial networks into which new buildings need to fit, in order to sustain the OUV of the Bath WHS.

Environmental Impact Assessment

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As the relationship between buildings and landscape is part of the OUV for which Bath was inscribed, the EIA should have considered the impact of the scheme on the overall landscape of Bath and its visual integrity.

ICOMOS-UK considers that the EIA for both applications has failed to address the impact of the scheme on the OUV of the overall city; instead it has identified a few selected ‘cultural receptors’ in the WHS and considered the impact of the scheme on them. This is to misunderstand the idea of a city as a whole being considered to have OUV. Clearly individual elements are important but the OUV of the Bath WHS is related to a grander vision, of town planning on a grand scale that integrates buildings into the landscape, and creates a beautiful garden city planted in the landscape to create picturesque views. The WHS of Bath has a visual integrity as a whole.

The EIA states that the assertion that the WHS and the city are inseparable in the Management Plan is wrong. This assertion is most certainly not wrong: what has been inscribed on the WH List is a large part of the city and how its overall spatial planning as well as individual elements contributes to its OUV are well set out in the Management Plan. The impact of new development needs to be assessed against the visual integrity of the overall city.

Furthermore the EIA asserts that it is not clear which elements of the site do not have OUV and suggests that the Management Plan does not distinguish between singular cultural assets and physical areas outside these. What the EIA has failed to grasp it that the spatial planning of Bath is what contributes to its OUV, not just individual assets, even though it quotes the management plan as implying the interconnectedness of architecture, planning and landscape. The WHS is not just a random assembly of cultural assets; it is an extraordinarily homogeneous city. This is made clear in paragraph 2.3.18 of the Management Plan: ‘*Bath is not merely a collection of outstanding 18th century monumental architecture but an entire city.*’ It is also clear that the gasworks and many of the industrial structures on the site now being discussed are not themselves of OUV; however the space on which they sit clearly is a key part of the overall spatial plan of the city and what is constructed on that space will contribute to or detract from the visual integrity of the city.

The EIA suggests that the site is distinct and separate from the core of the WHS and further that because the Conservation Area does not cover the whole area inscribed as a WHS, that somehow the areas outside the Conservation Area do not exhibit OUV or even reach the lowest grade of heritage value. Both of these statements misunderstand the nature of OUV. Not every element inside a WHS contributes to OUV; however on the other hand those areas inside the boundary of the WHS contribute to OUV in some way. In the case of Bath, not all areas have individually spectacular buildings, but overall the nominated area displays visual integrity and contributes to the overall landscape and planning for which Bath is renowned.

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To reiterate what is stated above, the space occupied by the development site is part of the overall spatial patterns of Bath. Although most of what is on it the site does not contribute to OUV, the site itself is an asset and development on this space can contribute either negatively or positively to the city landscape and its visual integrity and thus may either contribute to the OUV of the WHS or damage that OUV. In ICOMOS-UK's view the latter is the case.

Conclusions

ICOMOS-UK considers that the current proposals are a missed opportunity to create an exemplary development that relates to the organic forms of the landscape, reflects the particular rhythms of Bath, contributes to its renowned spatial planning, respects its menu of materials and overall contributes to the OUV for which the city of Bath was inscribed on the WH list.

ICOMOS-UK considers that the current proposals would impact adversely on the Outstanding Universal Value for which the City of Bath was inscribed on the World Heritage list, and would have a negative impact on its visual integrity. Furthermore any indication that this scheme might be approved could be a reason for the UNESCO World Heritage Committee to consider the possibility of Danger listing. We consider that the Council should avoid taking any decision that could have this effect.

Economic benefit is clearly set out as a key benefit of this scheme: ICOMOS-UK supports the need to regenerate this area of the city but not at the expense of its international significance.

We urge the Council to reject this application and to try and gain support from the RDA, English Heritage and others for a major strategy to guide the development of this site and other potential development areas in the WHS, in order to ensure that future developments are in harmony with the international significance for which Bath was inscribed on the World Heritage list.

Yours sincerely

Susan Denyer
Secretary ICOMOS-UK

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