

ENGLISH HERITAGE  
SOUTH WEST REGION

T.H.

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Our ref: P00109850

13 September 2011

Dear Ms Hampden

**Notifications under Circular 01/2001 & GDPO 1995**  
**GAMMON PLANT HIRE, ROCK HALL LANE, COMBE DOWN , BATH , BATH AND**  
**NORTH EAST SOMERSET**  
**Application No 11/02810/FUL & 11/02811/CA**

Thank you for your letter of 9 August 2011 notifying English Heritage of the above application.

### Summary

The site lies in the Bath World Heritage Site and the Combe Down Conservation Area and within the setting of a number of nearby listed buildings. It is our view that the existing buildings have a sufficient degree of significance to make a positive contribution to the conservation area and the replacement development will generate harm to designated heritage assets. A case for the proposals has not been made in accordance with the statutory provisions of PPS 5 on the Historic Environment.

### English Heritage Advice

The existing complex of buildings and open space originate as a quarry and stone yard associated with Bath's development during the C18 and early C19 and the operations of Ralph Allen. The site therefore has associative historical relevance to the World Heritage Site (WHS), and depending on its significance in this respect has potential for promotional application in accordance with the World Heritage Convention.

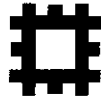
Regardless of its uniqueness from a wider contextual point of view, the site is unique to Combe Down and a defining feature of its conservation area. This formative interest is complemented by the creation of the maltings in the mid C19, and the operational relationship which once existed between the site and the public house opposite where much of the maltings-related fabric from that time has now been lost.



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While various reports acknowledge that the existing complex of buildings has seen much internal change the exterior of the buildings retains sufficient of its historic form, fabric and architectural character to allow for a ready recognition of its heritage value and historic role.

The location of the site on a fork in the road affords it a raised profile in terms of its townscape presence. Particularly evident as a visual punctuation when viewed from the north west along Combe Road the building's modest form and industrial vernacular sits comfortably against the adjacent cottage, and its alignment along Rock Hall Lane exposes much of its flank elevation to view. This has the effect of drawing attention past the site along both the Lane and in continuation along Combe Road, highlighting its positive role as part of a series of experiences which collectively define the character of the area. While the cottage itself has experienced some alteration to its exterior it retains sufficient of its historic form and relationship with the maltings as well as townscape value to afford it a degree of significance that precludes automatic assumption of its demolition.

Given the historical associative interest of the site and that this remains reflected in the existing buildings' physical make-up we would contend that the starting point in any development exercise should be to see how they could be retained and any additional development accommodated around them. We note that there is an intention to create a mining interpretation centre on the site and this would seem to be an ideal re-use of the building in full or in part. We have no objection to the principle of residential development or some level of new build but on the presumption that this should be incorporated sensitively within and around the existing built framework and take account of the site's historic interest and significance.

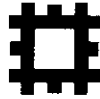
The application proposes the demolition of the existing fabric apart from the retention of the flanking wall to Rock Hall Lane. There will be a new interpretation centre building on the corner with Combe Road, and new residential development fronting both this road, and replacing the footprint of the cottage, and to Rock Hall Lane, incorporating an apartment and separate residential block aligned perpendicular to the street. The design approaches adopt contemporary idioms which are intended to be reflective of their use and the contextual variety of buildings in the area, and promote a low-carbon agenda.

There is little evidence of substance to justify the demolition of the existing buildings. The condition survey submitted fails to provide conclusive proof that the buildings' condition is beyond repair or meaningful re-use and there is no information from a development appraisal or feasibility study point of view to demonstrate that other concepts are not viable or deliverable for other reasons. While the design and scale of the proposed interpretation centre is distinctive and not inappropriate in its contextual



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contrast given the use which is proposed it has an uncomfortable relationship with the retained wall where the role of both in townscape terms is compromised. The new residential blocks assume a common, angular contemporary design which presents a rather bland and monolithic frontage to Combe Road and an intimidating block gable end on to Rock Hall Lane which dominates the streetscene and impinges upon the settings of the Grade II listed Rock Hall House and Byfield Place.

### Recommendation

The site and the buildings on it are important to the definition of the character and appearance of the Combe Down conservation area as a designated heritage asset. Their loss will detract from the value and significance of that asset which is not justified by sufficient evidence of public benefits. Further, the development proposed will generate harm to the setting of Grade II listed buildings which are designated heritage assets in their own right and which also play a positive role in defining the character and appearance of the conservation area.

We support the creation of an interpretation centre on the site and based on its historic association with the Georgian development of Bath but believe that the credibility of such an enterprise, its justification and the distinctive added value it brings to the area, will be dependent on exploring how the existing fabric could be more fully exploited in this intent. We accept the principle of housing on the site and the potential which exists to create contemporary sustainable accommodation which complements and enables an interpretation centre and enhances the conservation area by adding further interest to its varied estate of buildings.

However, we consider that the current proposals do not take sufficient account of the historic significance of the site and are over-ambitious in their aspirations. As a consequence we are of the opinion that the application does not satisfy the statutory provisions of PPS 5, and specifically policies HE6, HE7, HE9, HE10 & HE11.

Please contact me if we can be of further assistance. We would be grateful to receive a copy of the decision notice in due course. This will help us to monitor actions related to changes to historic places.

Yours sincerely,



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