



Bath Heritage Watchdog

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APPLICATION NUMBER: 12/03608/LBA

ADDRESS: 8 Brunel Square

PROPOSAL: Internal alterations to vaults to provide fittings and layout in connection with conversion to restaurant use.

CASE OFFICER: Geoff Webber

DATE: 16 October 2012

COMMENT: OBJECTION

Bath Heritage Watchdog strongly objects to this application.

Bath Spa Station, c1840 forms an important part of the original and internationally significant Great Western Railway, one of the earliest established railway companies in England. The masterpiece is constructed to a design by the engineer and architect Isambard Kingdom Brunel, widely perceived as one of the most important transport engineers of the 19th century. It is listed Grade II* and is within the Bath Conservation Area and World Heritage Site. The Great Western Railway is also considered of national and international importance.

It is increasingly clear that a certain amount of detail relating to Brunel Square has already been determined, whether through application or condition discharges. Unfortunately it appears that not all such detail is available or easily accessible. There should therefore be a requirement for a basic statement included with each application accurately detailing what does have consent to enable comprehensive assessment.

The conversion of arches and vaults within the station complex none of which were intended to be seen, automatically provides difficulties. Given that the rather tenuous justification for demolishing Brunel's original platform access ramp was that it would allow the public to see the vaults that were previously concealed, their size, internal spatial qualities and special architectural and historic interest has to be paramount and must be respected above any corporate aspirations.

Their opening up now provides an opportunity for the public to appreciate their inner beauty and if a proposed use cannot fit within these parameters then it has to be deemed an inappropriate use. It is therefore unfortunate that the arches have been marketed as a 'food quarter' (a use which seems at odds with the original concept of a transport interchange) and a use which is notoriously difficult to retrofit to listed structures if cooking takes place on the premises. Only extremely high quality works should be permitted as these initial applications will set a precedent for any future proposed works. We note that English Heritage has already raised strong concerns regarding works proposed.

SIGNIFICANCE

PPS5: HE6.1 *'Local planning authorities should require an applicant to provide a description of the significance of the heritage assets affected and the contribution of their setting to that significance. The level of detail should be proportionate to the importance of the heritage asset and no more than is sufficient to understand the potential impact of the proposal on the significance of the heritage asset. As a minimum the relevant historic environment record should have been consulted and the heritage assets themselves should have been assessed using appropriate expertise where necessary given the applications' impact'.*

In respect of this application no historical assessment has been provided at all. There is no reference to the listed status of the building (apart from the application form where it is incorrect), nor its location in the Bath Conservation Area and World Heritage Site. Whilst not expecting a major thesis the very least that is to be expected is consultation of the English Heritage Register which is easily accessible online and justification for any interventions in a structure considered by the Secretary of State to have particular national importance. In this respect we do not believe that the application should have been validated as it falls so far short of which is required for a Grade II* listed building application. As a minimum the applicant should be asked to provide this missing information so that the public can consider the changes against the historical assessment before the application is determined.

The proposals in this application are a clear demonstration that there is a complete lack of understanding of both the historic fabric and more especially the entire Bath Spa Railway Station complex (not 'Bath Southgate Rail Station').

It is also noted that pre-application advice was not sought from the Local Authority's specialist conservation officers. This is clearly reflected in the poor quality of the proposals as submitted.

The precise location of the application is also confusing. Although it is stated to be Arch 50 and this is shown on the site location plan, plans are also included showing the '*demise of kiosk 3*'. Clarification is therefore required. If any alterations are intended outside the redlined area they should automatically invalidate this application

Turning to the proposals submitted we would make the following comments:-

SIGNAGE

We maintain our objection to the use of illumination in the conservation area. In particular in this area we are concerned that with the number of different businesses in the area all wishing to impose their corporate identity in lights that the overall effect will be detrimental to this sensitive location and will detract from the beauty of Brunel's original design for the station.

In addition we feel that with recent reports relating to issues with electricity provision in the coming years that sustainability needs to be a strong consideration and that illuminated signage, being unnecessary, should not be permitted. Even "low energy" lighting uses energy that could be saved, and the cumulative impact will be significant.

Brunel Square will be sufficiently illuminated to allow the various businesses to be highly visible and we therefore do not believe that additional illuminated signage is necessary. In addition there will be plenty of light spilling from within the arch itself to negate the need for both illuminated signage and menu board. These issues have already raised strong concerns from English Heritage.

In this particular case a suspended fascia supporting 'neon effect text' is proposed. The size of the text is considered acceptable, but not the hanging fascia. This will appear 'heavy handed' in comparison with the lighter touch of the frameless glass frontage. Text signwritten on the glass would be ample to identify this business. An illuminated menu board is also unnecessary.

INTERNAL WORK

Unfortunately this is yet another application which has not provided photos of the application site. However, there is nothing to suggest that this arch will be different to the one adjacent and it is clear from the photographs provided with that application that these arches are spectacularly beautiful, substantially lined with Bath Stone and with spatial qualities second to none. It is absolutely imperative that the obscuration of any of the stonework is kept to an absolute minimum to retain the incredibly impressive spaces for all to see. It is with this in mind that we find the proposals submitted in this application wholly unacceptable and extremely detrimental.

From previous applications it would appear that previous consent has been given to the installation of mezzanine levels. However the size consented has not been made clear. We have severe concerns at the mezzanine to this arch given that it extends to half of the arch. It also appears to be constructed of hanging timber packing cases. This destroys the spatial qualities of the arch and should be reduced in size. Again there is considerable subdivision and a substantial amount of clutter.

Probably one of the most objectionable aspects of this application are the proposed timber stacking boxes to the mezzanine. They are unnecessary, overly dominant and again completely destroy the spatial character of the vault. This element alone renders the application unacceptable.

The internal visual document shows what appears to be some dangling tree trunks. These will need some considerable fixings to the stonework causing yet more unnecessary intervention. They are pointless, detrimental and shows yet more lack of respect to the historic structure.

The furniture and fittings which cut across and obscure the attractive interlining stone arches should be removed.

We object to the proposed lining out of large section of the walls with materials such as reclaimed sleepers, cladding and marble tiles. Whilst the need for washable surfaces is understood, this can be achieved through freestanding equipment rather than fixings to the attractive stonework and which will cause substantial damage to it.

The copper conduit and lighting should not be fixed to the stonework. Ultimately fixings to the stonework should be kept to that absolutely necessary, with the remainder being freestanding.

A door heater is proposed above the door but no information has been provided. It is unclear whether this conflicts with the position of the suspended fascia.

No information has been included regarding the historic floor finish and with no photos the historic floor cannot be assessed. Any historic floor finishes should be retained and reused and not covered up. If the existing floor is not reusable then a like for like replacement/restoration should be carried out. It is important that historic/replacement floor finishes are consistent across the complex of arches to retain their special architectural and historic character. A hotch potch of different finishes, like those proposed in this application, will be highly detrimental.

EXTERNAL WORKS

Tables and chairs are shown on the drawings yet no information on their design has been provided, nor a table management scheme drawn up.

SUMMARY

The works, by virtue of the use of inappropriate materials and methods, the excessive amount of subdivision and clutter and the obscuration of the beautiful stonework and destruction of the spatial qualities of the arches are considered to be detrimental to the special architectural and historic interest of the building, adjacent listed buildings and the conservation area contrary to S16 and S72 of the Planning (Listed Buildings & Conservation Areas) Act 1990, Section 12 'Conserving & Enhancing the Historic Environment of the NPPF and Local Plan Policies BH2, BH6 and BH17 and should be refused in its current format.

The application should be withdrawn and specialist advice sought from the Local Authority specialist conservation officers to ensure more appropriate proposals are submitted in sufficient detail to be properly assessed.