



## Bath Heritage Watchdog

contact@bathheritagewatchdog.org

APPLICATION NUMBER: 17/02034/LBA

ADDRESS: Herman Miller Building, Locksbrook Road

PROPOSAL: Internal and external alterations to facilitate general refurbishment of the former Herman Miller building including external cladding of the building, removal of internal mezzanine and installation of new, open mezzanine to the internal perimeter of the building and addition of a roof top pavilion to the southern elevation of the building

CASE OFFICER: Chris Gomm

DATE: 2 August 2017

COMMENT: REOBJECTION

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Bath Heritage Watchdog remains opposed to this application.

We note the revised drawings for an amended design and reduction in scale of the proposed rooftop extension.

The idea of a fully glazed unit (modular glass box) is not considered to offer any improvement over the previously submitted design. Neither the original application nor this modification takes heed of the guidance that was issued to clarify the interpretation of the Planning (Listed Buildings and Conservation Areas) Act 1990. The Parliamentary contribution was that *“the aim should be to identify the optimum viable use that is compatible with the fabric, interior, and setting of the historic building”*. In other words, preserving the fabric of the building is more important than a proposal to modify it. Associated advice was published jointly by DCMS and English Heritage in their *“Historic Environment Planning Practice Guide”* includes *“Some degree of compromise in use may assist in retaining significance. For example, headroom may be restricted and daylight levels may be lower than usually expected.”* This indicated that the problem that the modular glass box is claimed to solve should be tolerated rather than rectified, in order to preserve the plan form. Similarly *“It would not normally be acceptable for new work to dominate the original asset or its setting in either scale, material or as a result of its siting”* argues strongly against the mismatch between the styles of the original building and the rooftop extension.

As the joint author of the above advice, we wonder why Historic England has not reminded the applicants of this guidance. We also note that the reference projects seem to be in London and added to non-listed structures, so they have a very limited relevance. This indicates a complete lack of local knowledge and total disregard of listed building legislation regarding plan form. The latest reduction in size is also considered minimal and a mere token gesture.

We are disappointed in this continued approach in Bath of taking listed buildings and then bolting on extensions in glass or other inappropriate materials breaking the plan form, when there are clearly other solutions that can be adopted if the will is there.

Any extra facilities should be accommodated elsewhere on the site without compromising the integrity of the listed structure.

Our original objection therefore still stands.