



## Bath Heritage Watchdog

contact@bathheritagewatchdog.org

APPLICATION NUMBER: 17/06157/LBA

ADDRESS: 1-3 James Street West

PROPOSAL: External alterations for the installation of signage in association with A1 use granted under consent 14/01896/ FUL

CASE OFFICER: Samantha Mason

DATE: 31 December 2017

COMMENT: OBJECTION

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Bath Heritage Watchdog objects to this application.

When determining all applications for new shopfronts and signage we ask that the following guidelines are observed.

*The context, or general setting, of Bath should be understood, respected and reflected in any proposed work to shopfronts.*

*Design, materials and workmanship should be of the highest quality.*

*Any proposed or altered shopfront should be historically credible.*

*House styles which do not meet the requirements of style, lettering, materials and signs are not acceptable. Multiples should be required to adapt their proposals to the special conditions of the city.*

*Standard designs of any sort are not acceptable. They should be specifically designed for their context.*

## PRINCIPLE OF SIGNAGE

It has been recognised from the outset that the addition of any commercial signage to the building was going to be difficult, if not impossible, for this very reason. The Heritage, Design & Access Statement says '*The areas proposed for the new signage were identified as 'Signage Zones' in the elevations approved under planning application 14/01896/FUL*'. We have searched the documents online relating to this application and cannot find a reference to '*signage zones*'. The Delegated Report relating to application 17/00853/AR states '*Consideration of signage was not included in the original listed building consent for the scheme*' which confirms our findings. It is clear therefore that any future signage proposals would have to be dealt with by separate applications.

We have an 'in principle' objection to signage on the curved section of the building. This corner in particular forms the main focus of the special interest of the building. Nothing should detract from this.

The former Labour Exchange was the last remaining wartime 'make do and mend' repaired building in Bath, and although other bomb damaged buildings are preserved elsewhere in a derelict state, it is believed that this was the last wartime repaired survivor in the whole of the country that was still fit for use in its wartime repaired state.

The war scarred building stands as a reminder of the tragic events in the Bath Blitz and as a memorial to those who lost their lives in the Baedeker Raids. It stands as a physical reminder of those terror-filled days and nights, and is regarded as an unofficial war memorial by those influenced by those events. It is not a case of a head count of deaths in a particular building, but a uniquely symbolic reminder of what happened to Bath as a city.

We were therefore saddened to read in the Heritage, Design & Access Statement '*It should be noted that, while the plaque on the building is erected 'in memory' of those who died in the raid, the building was not occupied at the time and nobody died in the building itself*'. This statement clearly demonstrates that the author does not understand, or respect, the importance of this war scarred building to residents, those who come to Bath having lost relatives in the raids, and those who are interested in this period of our history.

## PROPOSED SIGNAGE

The use of PPC aluminium is opposed as it is an inferior material.

Turning to the signage itself, we first note anomalies within the documentation.

Drawing NL 1-PD77 (Proposed Elevations) and the photomontage do not show the proposed lighting which is clearly evident in Drawing NL 1-PD100 Rev A (Proposed Signage Details). Illumination is inappropriate for use on a listed building and should be removed from proposals. Clarification and revised drawings would be required in this respect.

The actual positioning of the proposed lettering is different in Drawing NL 1-PD77 (Proposed Elevations) to that in the photomontage. The photomontage shows the lettering centred over the curved section of the glazed frontage. The Drawing clearly shows the lettering centred relative to the windows in the new build above. Unfortunately the windows above are not aligned with the curved glazed frontage below. Therefore even allowing for the difficulties of illustrating a curve on paper, an imbalance on the corner will be very evident whichever position is selected.

No large scale drawings of the lettering or how it is to be fixed have been provided. It is not clear whether the letters are flat and therefore ‘stuck’ to the façade or offset and therefore pinned to the façade.

The description of this application mentions a lightbox in the corner window. No information has been provided for this but from the very description it is considered that it would be highly detrimental and offensive.

### BUSINESS CASE

Although our remit is heritage, to give balance we have also given careful thought to the business case put forward in the documentation.

It is clear that the building is not of a traditional shop form. This would have been completely evident at the time any lease was taken on. We consider that issues of signage and restrictions due to the listed status should have been addressed at that point in time.

The building is well known locally as the ‘former Labour Exchange’ or the ‘bomb scarred building’ therefore we do not consider identification should be an issue

The location of the building is not in the main shopping area of the city. Although James Street West is a busy street with a high footfall, it is generally used by those going to and from work/shopping and not necessarily a destination for those actually shopping. This will mean that any business depending on passing trade is going to find operating difficult. Presumably the original developers realised this when they applied for multiple use classes in the original application. It should also be noted that the previous tenants prior to the current development traded there successfully for many years with minimal advertising, and only left because their lease was terminated in order to construct the shop and student accommodation.

The Nisbets business therein is very specialist and because its website advertises “Catering Equipment” it appears to be primarily aimed at trade customers. The main type of equipment for sale is not for the average home but for commercial kitchens. Therefore the attraction to local residents is going to be limited, especially given the observed prices. It is also relevant that Bath has a very long established and popular kitchen equipment store within the main shopping area and it would be difficult to compete against that familiarity.

It would appear to us that any trade difficulties it is more a case of the wrong business in the wrong place than purely a question of advertising.

## **SUMMARY**

The works, by virtue of unnecessary illumination, inferior materials, a lightbox, conflicting documentation and the harm and offence that would be caused are considered to be extremely detrimental to the special architectural and historic character and interest of the listed building and especially the most important aspect of the listed building (ie the bomb damage) 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 Policies CP6, D1, D2, D9, HE1 and ST7 of the Core Strategy and Placemaking Plan and should be refused.