



## Bath Heritage Watchdog

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APPLICATION NUMBER: 18/04757/REG03

ADDRESS: Parkside Children's Centre , Charlotte Street, BA1 2NE

PROPOSAL: Extension of existing public car park, including reconfiguration of existing parking spaces, following the demolition of Parkside Children's Centre, with associated drainage, lighting and surfacing

CASE OFFICER: Chris Gomm

DATE: 20 February 2019

COMMENT: OBJECTION

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Bath Heritage Watchdog maintains its objection to this application. Our original objection remains valid and should be read alongside the comments below.

The preparation and presentation of the planning application is disappointing.

- The Application Form shows that pre-application advice was sought, but leaves blank the box to describe what the advice was. The Planning Statement mentions that pre-application advice was provided but doesn't mention it again after that half of a sentence.
- The other half of the sentence mentions the public consultation, and the community involvement document identifies Bath Heritage Watchdog as a Key Stakeholder. It is claimed that invitations were emailed to key stakeholders, yet our e-mail archive shows no such invitation.
- Finally, the council must have known of the history of the Parkside building because the council ran it as a British Restaurant while it was sponsored by the Ministry of Food, and purchased the building to operate it as a Civic Restaurant when the Ministry of Food discontinued its funding; yet surprisingly failed to tell Cotswold Archaeology the salient history.

It was only after Watchdog's criticism of the inadequate Heritage Assessment that Cotswold Archaeology prepared a much more thorough Heritage Assessment, which concludes that the building qualifies as a heritage asset, and is thus a material consideration in the planning application.

This more detailed investigation led to the Conservation Officer to note the potential for Parkside to be a rare surviving example of its kind, and the possibility that it might become a listed building should not be discounted. This led to a supplementary comment from Cotswold Archaeology that a lack of records does not automatically indicate rarity.

Watchdog's Committee discussed these points of view, and it was decided to test the true situation by thorough research followed by an application to Historic England to consider whether or not Parkside should be a listed building.

The first piece of research was to discover whether any of the British Restaurants in prefabricated form had been listed and that exercise showed that no British Restaurant, Community Kitchen or other possible descriptions, even down to something as generic as Feeding Centre was in the Listed Building Register.

The next element of research was to attempt to identify why, when the majority of British Restaurants were placed in existing buildings, Bath had not allocated any of the existing buildings to that purpose. Bath's ARP booklet published in 1941 makes it clear that there was a mutual help arrangement in the area rather than just for the city, with mutual assistance agreements with the County of Somerset and with Bathavon, and 21 Rest Centres were ready to use at a moment's notice in the aftermath of a bombing raid, with a further 28 that could be brought into use at short notice should the original 21 be overwhelmed, with Rest Centres outside Bath also available from the mutual agreement arrangements. Rest Centres were for temporary respite with light refreshments for those bombed out of their homes or places of work, until those attending them could be transferred elsewhere. There were also 27 Emergency Feeding Centres for those with still habitable homes but who had no gas, electricity or water because bombs interrupted supplies, and so such residents could not prepare their own meals. Effectively these were communal kitchens where people could bring their own food to cook, or purchase supplies and have them cooked at a modest price. That is why Bath had no suitable existing buildings and went for a new build approach for the British Restaurants. Bath's "area" approach would not have been universally seen, and therefore purpose built prefabricated restaurants would not have been common.

This suggested that purpose built British Restaurants would have been a significant minority among the 2000 or so that were set up during the war. There was also the probability that as part of the post-war building boom a number of them would have been demolished so that the land they occupied could be used for much needed housing. Bath may have been unusual in having the majority of its post-war housing built on previously undeveloped land, allowing the purpose built restaurants to be reused rather than replaced. It was felt that at least one ought to be preserved for posterity, especially when none are currently listed and Bath's may be some of a very small number of survivors. Parkside, with its report of being in good condition plus its status of being the largest in Bath made it the best candidate. Also, Parkside was the most used, serving 900 lunches a day, 30 teas and 70 suppers (open between 10am and 8.30pm, the cost of an average three-course lunch being set at 9d). In 1943 Parkside was opened in the evenings as well and became a venue for wedding receptions, parties, concerts and shows.

Watchdog's request for listing Parkside was sent to Historic England asking for it to be considered under two headings: Historical, because there ought to be at least one purpose built British Restaurant on the list; and Architectural, because it was delivered in pre-fabricated sections and it was known at the time how it should be assembled, but there were never any printed instructions, so the only way for architectural historians of the future to know how they were put together would be to examine one in good condition.

Parkside was bought by the council when the Ministry of Food ceased to fund it and operated as a Civic Restaurant for a while. That use ceased at the end of 1950 by which time the spare ground on the north side of the building was already in use as car park. It was then used to house Kingsmead Infants School which subsequently became Parkside Infants School. It closed as a school in 2006 when it became a Children's Centre. Whilst it is true that it was modified after it closed as a restaurant, the original footprint and construction methodology is still clearly visible, and the method of subsequent modification will have some interest value in its own right.

The other background that formed part of the application to Historic England was that the windows in the exterior walls are the original concrete embrasures but the frames are now UPVC. No original doors survive but it is believed that the doorway on the north east elevation and its approach ramp date to the 1940s build as the latter is of identical character to the main concrete base. Part of the boiler house is built in brick on the south east end of the north east elevation and is not part of the pre-fabricated construction. It does not sit on the concrete base so might be thought of as an addition. If so, it still pre-dates the conversion to a school in 1951 as it was mapped before the conversion. In fact, it probably is an original element as the prefabricated section was too simple and rigid in design to accommodate a boiler house.

Historic England recognised that we had provided a thoroughly-researched application. However, they noted that the Principles of Selection for Listed Buildings was updated in November 2018, clarifying the reasons why buildings will be listed for their architectural and historic special interest. In the case of wartime buildings the Listing Selection Guide for Military Structures dated December 2017 also applies, even for civilian structures.

For wartime buildings, Government policy is clear that candidates for designation ought to be well preserved in a form which directly illustrates and confirms their historical associations. The kitchen had been a substantial part of the design, covering almost half of the original interior, and its current absence doesn't meet the criteria for national listing. However, Historic England did temper that refusal by noting that "the building clearly has a very high degree of local interest and preserves the character and appearance of the conservation area, featuring the locally characteristic use of Bath stone ashlar to its courtyard elevations".

Historic England's conclusion was that "*the criteria for listing are not fulfilled, although the building is of considerable local interest as a rare surviving example of a purpose-built structure for civilian use in wartime Bath. Despite its high level of alteration the building represents an unusual survival that is highly evocative of the period directly following the heavy bombing of the City of Bath during Spring 1942*".

Based on that opinion, it is clear that the Conservation Area would be adversely affected by the loss of Parkside, which Historic England confirms helps preserve its character and appearance. Furthermore, the building is very clearly of considerable local interest, and therefore should be preserved as described in Policy DW1: "protecting, conserving and enhancing the District's nationally and locally important cultural and heritage assets".

The greatest contribution to sustainability is to reuse a sound locally important building; and the planning application to demolish Parkside fails to comply with Policy DW1 and fails to preserve the character and appearance of the conservation area as required by the Planning (Listed Buildings and Conservation Areas) Act 1990, and therefore permission should be refused.

The full text of the Historic England report is being copied separately to the Conservation Officer.