

I am writing to reiterate my serious objection to current plans to partly demolish and make major alteration to features of the principal building of the former Stothert & Pitt works -- known as the Newark Works -- fronting the Lower Bristol Road in Bath. It is my understanding that English Heritage, which earlier granted Class II designation to the Newark Works, has agreed to relax its objections to some aspects of the site proposal, intended to facilitate re-use of the site for the proposed Dyson School of Design Innovation.

While not wishing to interfere with aspects of the proposal that are for local residents to determine, I feel I really must object to the sheer extent of the proposed alterations, in light of the building's distinguished history. This is not just any old factory in Bath. **It is the last known work in England of one of the most distinguished architects Bath ever produced** – Thomas Fuller (1823-98) – and among his largest buildings erected in the west of England. So, let me address Fuller's significance, and my fitness to comment on it, before returning to the question of the proposed alterations.

As an art and architectural historian who has studied Fuller's career for over thirty years and is thoroughly familiar with the context of that career in North American history – my published work concerns both Canadian and American subjects -- I can definitively say that Thomas Fuller is one of the most important architects England sent to 19th-century North America. Besides his work in Canada, Fuller did major work in the United States – on the New York State Capitol and the San Francisco City Hall & Law Courts – and also designed an Anglican cathedral in the British West Indies (on Antigua).

In Canada, he was the designer of the national Parliament Buildings at Ottawa (1859-76), a building-complex architectural historians consider one of the finest works in High Victorian Gothic *in the world* and, as Chief Architect of Canada's Public Works department, set his stamp on governmental building-design across the Dominion of Canada. For more detail on Fuller's career, see my article in the authoritative [Dictionary of Canadian Biography](#), vol. 12. Without question, he is among the most distinguished architectural exports ever of the west of England, a point to be borne in mind when considering the contemplated building-alterations. I suspect that, were such alterations being contemplated to buildings in Bath's Queen's Square, The Circus, or Lansdowne Crescent, those alterations would be somewhat more modest and more heavily scrutinized than those currently being contemplated in the Lower Bristol Road; yet, that is the level of building that is being tampered with. I understand that more is at issue when sites are evaluated for redevelopment than their architects' identity; I have worked in the field of heritage preservation myself and been called on to make prudential decisions about a building's worth. As a result I know that a building's architectural history and pedigree are key contextual factors in evaluating redevelopment projects on it.

As I understand it, the demolition/alteration project planned for the former Newark Works of the Stothert & Pitt company ("crane-makers to the world") is very thorough-going, far more than mere modest building-modifications. Taken together, the removal of ancillary, surrounding buildings and the piercing of the principal building's front wall by an arcade and the removal of its roof and replacement by several additional glass storeys – quite apart from interior changes, which seem far-reaching enough in themselves! – will effectively violate the integrity of that principal building and reduce it to a mere façade, and one punched full of holes at that. In the business this is called "facadectomy," and we know from sad experience that it does not preserve a building's integrity.

I fully understand that the building is on the Avon flood-plain, requiring certain accommodations -- such as, perhaps, enclosing the site in a concrete "bath-tub," a miniature version of that of the World Trade Center site in New York -- and that the developers need sufficient developable square-footage to make their redevelopment feasible; **but it is not my impression that the current design attends sufficiently to *the principal building's overall character, envelope, and profile as seen from the complex set of viewpoints to which the site by the river and in the Lower Bristol Road exposes it.***

I have no wish to prevent the adaptive re-use of the Newark Works for a productive contemporary purpose – indeed, such a purpose is the best guarantee of the works' survival – nor to interfere with issues of design and re-use best left to the residents of Bath; but the inclusion of the South Quays area in the Bath World Heritage Site means that the City and Council have a responsibility to a wider audience – indeed, to the world – to reach decisions about buildings within the heritage site that take into consideration those buildings' importance in the larger scheme of things and that respect the buildings' fundamental historic character. I hope and trust that those factors will be kept in mind when the Newark Works' future is being decided, for Bath itself has had plenty of chance to learn that nothing destroyed can ever be brought back.