

**Application Number: 10/05325/LBA****Address:**

21-22 High Street  
Bath BA1 5AJ

**Proposal:**

Internal alterations for the provision of a street lantern to the ceiling of the passageway which runs through the building from the high street to Northumberland Place

**Comments: submitted at 16/01/2011**

Bath Heritage Watchdog objects to this application.

Nos 20, 21 and 22 High Street are listed at Grade II. Three storeys and attics, ten bays, four:two:four, within the two set slightly forward, these are over entrance to Northumberland Place. Ground floor has shops under deep fascia. No 21 has entrance to Northumberland Place including above the archway a pediment and, in Coade stone, the arms of Frederick Augustus, Duke of York & Albany (1763-1827).

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 information has been provided. There is no reference to the listed status of the building or the location in the 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.

In the absence of such historical information, we have carried out some brief research. It would appear that aspects of the buildings are considerably older than thought. Remedial and refitting works at nos 21-22 High Street in December 2000 exposed roof and jettied gable frames, wattle & daub and the apex of a roof truss encased within 19th century lath & plaster skins and behind partition walls. Subsequent investigation during refitting revealed an almost complete jettied cross-wall frame, two collar and tie-beam trusses and a palimpsest of other features indicating lifting and refacing of the building. The frames, which have been resealed behind new wall linings, appear to be of 15th and 17th century form. The combination of this discovery and earlier findings at the former Christopher Hotel suggest that many of the ostensibly Georgian buildings in central Bath are merely facades behind which much medieval fabric survives. As a result, little is known of the character of the secular medieval buildings of Bath, and nothing of its timber building tradition. ('A Late Medieval Timber Frame at Nos 21-22 High Street, Bath' Michael Heaton & Peter Davenport).

Applicants must be able to justify their proposals, showing why works are desirable or necessary.

The Design & Access Statement simply says 'A request for better lighting in the passageway had been made by the local traders....'. There is no explanation as to why it is suddenly considered that the passageway needs to be lit. There are extensive shop frontages lining the passageway which provide lighting during trading hours. After trading hours it is not considered that lighting is justified and indeed would be detrimental to the character of the building.

Drawing HS/2 shows the proposed location of the light. The drawing does not show the timber cross beams giving doubt as to the precise position of the light. No information regarding any wire runs or fixings have been supplied.

The photos provided, together with the crude montages, show clearly that the general area in which the light is to be located means that the light will be very conspicuous and therefore detrimental to the listed building and the setting.

Two design options have been submitted. Both are wholly unacceptable. They are standard off the shelf utilitarian street lighting. Whilst they may be considered appropriate for modern underpasses, in no way can they be considered acceptable for such an historic and sensitive area. If a light is to be permitted then it is considered that something more commensurate with the age and style of the building should be installed, perhaps some type of lantern.

The works by virtue of a lack of justification, inadequate drawings leaving doubt as to the precise position of the light and wholly inappropriate light designs are considered to be detrimental to the special architectural and historic interest of the building and the general setting contrary to the Planning (Listed Buildings & Conservation Areas) Act 1990, PPS5 and Local Plan Policies BH2 and BH6 and should be refused.