

Bath Heritage Watchdog, P O Box 4252, Bath, BA1 0HX
chairman@bathheritagewatchdog.org

APPLICATION NUMBER: 11/03571/LBA

ADDRESS: 46 Milsom Street

PROPOSAL: Internal alterations to No.46 Milsom Street and The Octagon to re-establish former pedestrian connection, together with associated works to enhance interior of Ante Room.

CASE OFFICER: Varian Tye

DATE: 4 September 2011

COMMENT: **OBJECTION**

Bath Heritage Watchdog strongly objects to this application.

The Octagon Chapel dates from 1766-1767 by Thomas Lightoler, with 20th century alterations. It was built by funds raised by subscription and promoted by a banker William Street, on the site of his garden in partnership with the Rev Dr Dechair. The chapel is a very special room contained within a plain and windowless rectangular building, with a gallery on 8 unfluted Ionic columns. An entablature with a festoon frieze terminates the walls, over which rises a shallow octagonal dome with delicate light plasterwork, strings of husks and a circular window in each facet. Above is a smaller coved ceiling with a drum, decorated with swans, and a saucer-shaped lantern. It had on the ground level recesses in the corners, two with fireplaces for invalids. The sanctuary has an excellent wrought iron chancel screen with scrolls and foliate decoration. The Octagon Chapel was essentially comfortable, pleasant and commodious and frequently served as a concert hall. Its fine Snetzler organ was inaugurated in October 1767 with a performance of Handel's Messiah and an organ concerto, the latter played by the chapel's resident organist for many years, the astronomer and composer Sir William Herschel. It remained a chapel until 1895 when it became an antiques showroom and then the premises of the Royal Photographic Society in 1979. It is listed Grade II* and is located within the Bath Conservation Area and World Heritage Site.

No 46 Milsom Street dates from c1765 by Thomas Jelly with alterations to a shop in 1900-1901 by Silcock & Wray. In fact this is where the architects had their offices. It is listed Grade II and is located within the Bath Conservation Area and World Heritage Site.

JUSTIFICATION & ASSESSMENT

There are several misconceptions contained within the Design & Access Statement which demonstrate that the applicants do not understand the importance of the Octagon Chapel and have not correctly assessed the building:-

'The Octagon Chapel is variously recorded as being both grade II and grade I listed'*. This is totally incorrect. The Octagon was Grade I listed until the recent English Heritage review across the city. It was then amended to Grade II*. There is no written record of why this happened but we have to wonder whether the recent inappropriate and damaging work carried out to the building as part of the Milsom Place development has played a part in this, together with the general neglect of this once fine building.

'The Chapel is of more local than national significance'. If this was the case then it wouldn't be nationally listed. PPS5 makes it clear that Grade I and Grade II* designations are of the greatest significance nationally. Buildings of local importance rather than national are not generally listed at all.

'Its current form should be viewed as a whole with The Octagon Chapel and 2 Broad Street, which between 1921 and 1938 were a combined retail design'. This is incorrect. The buildings are listed separately in their own right. Whilst they do have histories which overlap and intertwine, they are very much still separate entities.

'The effect is the re-integration of these two properties; as they had been since the Chapel function ceased'. This is not the way to approach the re-use of historic buildings. The original plan form should be the starting point and then to look at the evolutionary history. It is clear that the applicants simply wish to choose parts of the buildings' histories to satisfy their own ends.

'The interior has been somewhat denuded of detail, especially at ground floor and has lost principal features of organ, fixed furniture, apses, fireplaces and stairs' and *'The formal approach from Milsom Street has been substantially altered'*. Both these statements are true to an extent. However, this is not justification for carrying out additional inappropriate work which will further damage the listed assets. Alterations previously carried out which have damaged the heritage asset could be argued to reinforce the need to take extra care in those cases where properties are found which still retain elements of their historic plan form/fabric and features.

Applicants for listed building consent must be able to justify their proposals. They need to show why works which would affect the character of a listed building are desirable or necessary. Even then PPS5 states that harm to heritage assets designated Grade I and Grade II* should be "wholly exceptional". The applicants have not shown a wholly exceptional reason for the changes that have been applied for.

The justification for the proposals in this application are tenuous to say the very least and will effectively reduce the Chapel to a corridor or access route from Milsom Street to Milsom Place.

'The Octagon entrance from Milsom Street will be retained, the scale and character of the present passageway arrangement together with the nature of other service access served from it make it unsuitable as the primary entrance. This access will therefore primarily be used for service and means of escape purposes, with the primary level access being off the Milsom Place frontage and improved access to the retail space being through No 46 Milsom Street'.

This statement perhaps underlines the real reason for this application; the applicants see this important building as no more than a means to achieve another entrance to what is a floundering development. The original entrance to the Octagon has been compromised, with that there is no argument. However, with some careful remedial and restorative works this entrance could be enhanced. Part of the character, and original plan form of the building, is the long entrance opening out into the anteroom and then the dramatic main area of the chapel, which was formerly centred upon the stunning chandelier that hung there (and which has in recent times disappeared). Making redundant the original entrance doorway of the Chapel would alter the entire reading of the building. You would be entering the Chapel from the wrong direction and in the wrong way thus not seeing the building as it was intended. Creating more holes in the Chapel walls just to create an additional access to the modern development of Milsom Place is wholly inappropriate and illustrates the unacceptable ethos behind the whole development.

We would also question whether the use of No 46 as a shop would be as attractive if it were partly acting as an entrance to the development behind. It would increase the number of egress points meaning security would become a very difficult and probably costly issue. This could lead to tenants being difficult to find and retain possibly threatening the viability of what is, and has always been, a successful unit in its own right and therefore the listed building.

The Chapel is clearly not redundant as a space, evident by the number of exhibitions, etc held in recent months. There are organisations which will look for smaller size exhibition spaces to use and providing the costs are not artificially prohibitive there is no reason at all for the building to become redundant. We do have one serious concern, however, when the space is used in this way and that is the wholly unacceptable practice of nailing and screwing banners and posters to the door frontage. Not only does this cause damage to the historic fabric but it also obscures the fine entrance. A sensible strategy would need to be drawn up to prevent this from happening.

PROPOSALS

There are effectively three parts to this application: the reopening of the north access between No 46 and the Anteroom, the creation of an eastern access point between No 46 and the Anteroom and the part restoration of the Anteroom.

PPS5: HEPPG Para 142 states *‘Each heritage asset and group of heritage assets has its own characteristics that are usually related to an original or subsequent function. These can include orientation, layout, plan form, setting, materials, the disposition of openings, external detailing (with larger assets or groups of assets this might include street furniture) and internal fittings’*.

PPS5: HEPPG Para 182 states *‘The plan form of a building is frequently one of its most important characteristics and internal partitions, staircases (whether decorated or plain, principal or secondary) and other features are likely to form part of its significance. Indeed they may be its most significant feature. Proposals to remove or modify internal arrangements, including the insertion of new openings or extension underground, will be subject to the same considerations of impact on significance (particularly architectural interest) as for externally visible alterations’*.

PPS5: HEPPG Para 179 states *‘The fabric will always be an important part of the asset’s significance. Retention of as much historic fabric as possible is therefore a fundamental part of any good alteration or conversion, together with the use of appropriate materials and methods of repair. It is not appropriate to sacrifice old work simply to accommodate the new’*.

With regard to the openings the first point of reference should be the original plan form of the Octagon. This reveals that there were no openings in either of these places. Over the years it is clear that an opening was created in the northern position and a window to one side in the eastern position.

Whilst it could be argued that reopening of that northern entrance involves no loss of historic fabric, it does create a variant from the original plan form of the building and, as stated before, the way in which the Chapel was intended to be approached. We therefore do not believe that the justification outweighs the harm that would be caused.

With regard to the creation of an eastern opening, this would involve the loss of a substantial amount of original historic fabric, which we do not believe is either acceptable or justified. It again creates a variant from the original plan form of the building and again alters the way in which the Chapel was intended to be approached. Although it is stated that the proposals are reversible the loss of historic fabric is never reversible; once it has gone it has gone forever.

The rear room of No 46 Milsom Street is clearly an attractive unit in its own right with the dominant lantern. It is considered that the puncturing of the two walls with openings will detract from its character as well as altering the plan form.

We do not disagree that there is evidence of former changes and alterations with regards to the plasterwork, etc, but the reference point has to be the original plan form of the Octagon Chapel and the creation and use of the openings as proposed are considered to be contrary to this and contrary to the relevant guidance.

We have no objection to the removal of modern partitioning as proposed which will enhance the buildings.

With regard to the proposals for the Anteroom, clearly we would be supportive of its restoration as part of this important building. We feel that the Octagon has been sorely neglected and abused in recent years and restoration has to be the ultimate goal. Clearly the restoration proposals in this application will be dependent on the other alterations. However, taking all of this into account we feel that on balance the harm that would be caused to the building outweighs the benefits.

SUMMARY

The works proposed by virtue of the loss of historic fabric, the alteration to the original plan form of the buildings, the closing of the original Chapel entrance and the effective denigration of this important building to a corridor is detrimental to special architectural and historic interest and character of the listed buildings contrary to S16 of the Planning (Listed Buildings & Conservation Areas) Act 1990, PPS5: Planning for the Historic Environment and Local Plan Policies BH1 and BH2 and should be refused.