

**Bath Heritage Watchdog, P O Box 4252, Bath, BA1 0HX
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APPLICATION NUMBER: 11/04166/FUL

ADDRESS: Gammon Plant Hire, Rock Hall Lane, Combe Down,
Bath

PROPOSAL: Erection of 1no. Mining Interpretation Centre (rated BREEAM Excellent), 8no. Eco-Homes (rated Code 5 zero carbon), 1no. Apartment (rated Code 5 zero carbon) and all associated hard and soft landscaping following demolition of all existing properties, with the exception of a portion of historic stone wall to Rock Hall Lane (resubmission).

CASE OFFICER: Tessa Hampden

DATE: 6 October 2011

COMMENT: **OBJECTION**

Bath Heritage Watchdog strongly objects to this application.

As with the previous application, we first have to state that in principle we are fully supportive of the founding of a stone mine interpretation centre. It is vital that the story of stone mining in the city and its contribution to Bath's evolution is told. For it to be founded in the actual mine environs is contextually appropriate.

We also do not object 'in principle' to the use of part of the site for residential units.

Unfortunately the proposals as submitted are considered to be wholly unacceptable and indeed detrimental to the environs of Combe Down.

PRINCIPLE OF DEMOLITION & DEVELOPMENT

The application seeks to demolish all buildings currently on site with the exception of the wall on Rock Hall Lane. It is clear from the Historic Building Report that besides some more modern construction on site, there are several buildings which have importance to the history and evolution of Combe Down.

The general presumption should be in favour of retaining buildings which make a positive contribution to the character or appearance of a Conservation Area. Consent for demolition should not be given unless there are acceptable and detailed plans for any redevelopment.

The maltings buildings still retain some of their features, although it is recognised that the interiors have long since disappeared. Specific features such as the parish boundary marker, the internal king post truss, and former openings still visible on the corner building (TV shop) all contribute to the history of the area.

We consider that the older buildings on site are not only important historically but also contribute positively to the Conservation Area. PPS5 makes provision for unlisted buildings to be considered as heritage assets. We believe that these structures fall into this category. We do not believe that the revised structural report provides any further justification for their demolition and we therefore believe that the historic buildings on site should be retained and converted.

In addition we do not believe that demolition should be consented due to the fact that the proposed development is wholly unsatisfactory. It should also be noted that reuse of existing buildings makes a greater contribution to sustainability than new construction with modern facilities once the carbon footprint of demolition, steel, glass and cement manufacture and transport to and from site are taken into account.

DESIGN

We are very disappointed that the proposed interpretation centre forms such a small part of the site and, indeed, appears squashed into one corner. We would suggest that this is inadequate and appears to be a token gesture in order to take advantage of the wider development. To expect visitors to travel to Combe Down for such a small centre is inappropriate. In addition there is no parking provision for visitors to the centre. On-street parking in this area is almost impossible. At the very least disabled spaces need to be provided.

PPS5: *'The main issues to consider in proposals for additions to heritage assets, including new development in conservation areas, are proportion, height, massing, bulk, use of materials, use, relationship with adjacent assets, alignment and treatment of setting'.*

The Bath Citywide Character Appraisal for Combe Down states:

'There is a mix of terraced, semi-detached and detached housing. Notable building forms include terraces and 19th century villas associated with the stone mines and quarries. Most buildings are two storeys high. The 18th and 19th century buildings are typically well proportioned and range from impressive villas to more humble terraces. There are some particularly ornate architectural details on the church, and on some of the older and larger residential properties. The buildings are usually built in Bath Stone with a variety of slate, clay tiles and concrete tiles for roofing'.

'The area is particularly significant as one of the main sources of Bath Stone for the development of 18th century Bath. The importance of mining in this area is evident in the range of 18th and 19th century houses from workers' cottages to impressive villas. They are quite distinctive and give the area its strong sense of identity'.

'Modern buildings are often out of character due to deep plan forms, large unbroken roof expanse, flat roofs and poorly designed roof service facilities'.

The overall design of both the interpretation centre and the residential units is alien not only to Combe Down but also to Bath itself. The reason for this is puzzling as the Character Assessment submitted with the application correctly assesses the built form of Combe Down.

It is true that there are a variety of styles of building within Combe Down, however they are all of similar sizes and heights. One common factor of buildings in Combe Down is the pitched or gabled roof. No matter what period the building comes from, they all have these roofs in common. It is interesting to note that all the photos included within the Character Assessment had a pitched or gabled roof, whether tiles or slates. This is one of the main reasons why the development as proposed is incongruous to the locality. Although recognising the minor amendment to the roofs, large blocks with flat roofs are never going to be appropriate as is clearly illustrated in Drawing No HS101/040 (Aerial View). Having correctly identified this it is not understood why such features were not incorporated into the design. We acknowledge the removal of a storey to the rear blocks, and the reduction in impact from height from some viewpoints, however the impact is barely changed overall.

The applicants recognise that *‘The windows and openings exhibited on the buildings of Combe Down have a common trait in that they are largely minimal and refined. This is true from the grand Georgian properties of De Montalt place to the discrete Rock Cottages’*.

Again having identified this trait, the architects have chosen to go in a completely different direction. The large expanses of glass bear no resemblance to the vernacular and the glazing to the rear elevations could not be described as ‘refined’ in any way at all. The use of triple glazing is also considered inappropriate and unnecessary. The addition of the external spiral staircases adds to the visual clutter. As noted above the sustainability claims are illusory.

Although it is recognised that environmental concerns are an important part of modern design, it should not be at the expense of creating an appropriate development. However, we query the sustainable credentials of the development. Longevity should also form part of a sustainable and environmental design. No doubt there will be an internal framework of steel and concrete neither of which is environmentally sound or designed to last, glass has a lot of embodied power in its manufacture therefore the excessive and unnecessary amount of glazing is unsustainable, the timber cladding, although renewable, is not long lasting without constant maintenance – usually with chemicals. Although appreciating that using Bath stone blocks is more expensive, it is the most sustainable form of development. You only have to look around at the age of the surrounding buildings, some of which are over 200 years old – the buildings proposed will not last anywhere near that length of time.

The use of photovoltaic panels is opposed. They are large, unrefined and alien to the area. If pitched or gabled roofs were to be incorporated into the design then the individual photovoltaic slates could be used. These are far less intrusive and yet carry out the same job.

MATERIALS

This is one of the largest issues with the entire development – the use of inappropriate materials. The Bath Citywide Character Appraisal states:

‘Bath’s buildings have an inherent quality given by the use of a limited palette of natural materials: well-detailed and well-maintained Bath stone, Welsh slate (principally soft blues and purples), painted iron and painted timber’.

‘The scale and consistency of these natural materials, their inherent colours and the subtlety of their natural weathering, gives Bath’s buildings a cohesive quality which is a key characteristic of the city’.

Although there is use of Bath stone cladding, timber cladding and glass are proposed. None of these form the limited Bath palette of materials and their use in the area responsible for the Bath Stone mining industry and forming part of the mining interpretation site is an anathema.

One of the reasons that Combe Down has a uniformity about it is the use of stone – whether ashlar rubble or even reconstituted (not that this is considered acceptable). They form the vernacular and it is this homogeneity which makes the buildings fit. This was identified in the Character Assessment and yet again the architects have chosen from a completely different palette of materials. It is also stated that some of the stone is to be heavily textured to ‘create dynamic shadows’ which would appear to be another gimmicky feature.

Green roofs are also the latest trend. Again it is an alien feature. They are very heavy and require a stronger substructure, and so a greater carbon footprint for materials. Far from being a benefit they encourage nesting birds, especially seagulls which subsequently become pests. They also require maintenance which will bring a requirement for protective barriers around the perimeter for health and safety purposes and these are not shown on the drawings.

CONCLUSION

We are extremely disappointed that the applicants have chosen to tweak the original proposals rather than take on board previous comments made, especially relating to the retention of the heritage assets.

It is clear from the visualisations provided that the proposed development would have a detrimental impact on the adjacent listed buildings and their settings, especially the view from the bottom of Rock Hall Lane, and the Conservation Area. The view from Combe Road clearly illustrates the almost brutal impact on the locality and shows just how incongruous the design is.

We do not believe that there is adequate justification for the demolition of the historic buildings on the site which contribute positively to the Conservation Area. We also do not believe that the proposed residential development is either appropriate or of sufficient quality to outweigh the harm that would be caused by demolition.

The works, by virtue of their design, mass, scale, bulk and materials used are considered to be detrimental to the setting of listed buildings and the conservation area contrary to S16 and S72 of the Planning (Listed Buildings & Conservation Areas) Act 1990, PPS5: Planning for the Historic Environment and Local Plan Policies D2, D4, BH1, BH2 and BH6 and the Citywide Character SPD and should therefore be refused.