



Bath Heritage Watchdog

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APPLICATION NUMBER: 12/04950/LBA

ADDRESS: 3 Brunel Square

PROPOSAL: Internal alterations to vaults to provide fittings and layout in connection with conversion to restaurant use to include advertisement and stone walls to be repaired and sealed with non toxic sealant

CASE OFFICER: Geoff Webber

DATE: 7 December 2012

COMMENT: OBJECTION

Bath Heritage Watchdog strongly objects to this application.

Bath Spa Station, c1840 forms an important part of the original and internationally significant Great Western Railway, one of the earliest established railway companies in England. The masterpiece is constructed to a design by the engineer and architect Isambard Kingdom Brunel, widely perceived as one of the most important transport engineers of the 19th century. It is listed Grade II* and is within the Bath Conservation Area and World Heritage Site. The Great Western Railway is also considered of national and international importance.

It is increasingly clear that a certain amount of detail relating to Brunel Square has already been determined, whether through application or condition discharges. Unfortunately it appears that not all such detail is publicly available or easily accessible. There should therefore be a requirement for a basic statement included with each application accurately detailing what already has consent and what is newly applied for to enable comprehensive assessment.

The conversion of arches and vaults within the station complex, none of which were intended to be seen, automatically provides difficulties. Given that the rather tenuous justification for demolishing Brunel's original platform access ramp was that it would allow the public to see the vaults that were previously concealed, their size, internal spatial qualities and special architectural and historic interest has to be paramount and must be respected above any corporate aspirations.

Their opening up now provides an opportunity for the public to appreciate their inner beauty and if a proposed use cannot fit within these parameters then it has to be deemed an inappropriate use. It is therefore unfortunate that the arches have been marketed as a 'food quarter' (a use which seems at odds with the original concept of a transport interchange) and a use which is notoriously difficult to retrofit to listed structures if cooking takes place on the premises. Only extremely high quality works should be permitted as these initial applications will set a precedent for any future works.

We first have to address the issue of work being carried out prior to an application being submitted. It would appear that work to this unit if not complete, is underway. Unauthorised works to a listed building is a criminal offence and cannot be condoned. The application should be noted as being retrospective.

DOCUMENTATION

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 at all. There is no reference to the listed status of the building, nor its location in the Bath 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 which is easily accessible online.

This application is extremely poorly presented. There are no individual scanned drawings and those which are included in the only document which is provided cannot easily be viewed – indeed some are so pale as not to be legible in places. No photographs of the finger vault in question have been provided. Given that the entire site is still not open to the public and a full site visit is therefore not possible, it is considered that sufficient visual information should have been provided to allow the public to assess the potential impact. We do not believe that this application should have been validated without all the required information.

We are also disappointed that pre-application advice has not been sought from the specialist conservation officers in the Built Heritage Team.

We turn to each aspect of the application.

SIGNAGE

We maintain our objection to the use of illumination in the conservation area. In particular in this area we are concerned that with the number of different businesses in the area all wishing to impose their corporate identity in lights that the overall effect will be detrimental to this sensitive location and will detract from the beauty of Brunel's original design for the station.

Brunel Square will be sufficiently illuminated to allow the various businesses to be highly visible and we therefore do not believe that additional illuminated signage is necessary. In addition there will be plenty of light spilling from within the arch itself to negate the need for illuminated signage. These issues have already raised strong concerns from English Heritage.

The documentation states *‘Out of House Lights: ‘when closed the lights that will remain on are the halo illumination around the sign and the halogen spot lights around the shop window (behind the glass)’*. Given that the opening hours are stated to be 6am to 11pm it is queried why any lights would need to be on outside these extended hours anyway.

In addition we feel that with recent reports relating to issues with electricity provision in the coming years that sustainability needs to be a strong consideration and that illuminated signage, being unnecessary, should not be permitted. Even ‘low energy’ lighting uses energy that could be saved, and the cumulative impact will be significant.

There are no large scale drawings of the proposed signage, cross sections or their fixings to be able to assess the application. It would appear that the sign is to be an aluminium box sign to RAL colour (which isn’t given) with a full backtray to house fluorescent tubing. This will appear ‘heavy handed’ in comparison with the lighter touch of the frameless glass frontage. Text signwritten on the glass would be ample to identify this business. In short there is insufficient information for full and proper assessment

EXTERNAL WORKS

Mention is made of external furniture including canvas barriers, yet no information has been given of this, the type, the design, the area to be utilised, etc. Given that these units are in the main area used by travellers traversing in both directions between the bus station and the railway station, quite likely with heavy luggage and often with a child in a pushchair, this area must be kept completely clear to allow unimpeded access. Anything else would negate the claimed benefit from the removal of the ramp – the ease of access for travellers. A table management plan including such details as the area the tables & chairs are to be kept in is required.

INTERNAL WORKS

Although it is appreciated that the applicants may consider that their additions reversible, this does not negate the need to respect the historic structure and for it to be ensured that no damage is caused.

It is actually difficult to ascertain what precisely is proposed as the documentation is so poor. The documentation consists of pages of different trade brochures with nothing explained or annotated as to where each article is to go.

The most worrying aspect of this application is the use of a stone sealant. Although the documentation does not actually show where this is to be applied, as the application description includes the section *‘stone walls to be repaired and sealed with non toxic sealant’* we can only conclude that this is proposed to the internal vault walls. English Heritage has already raised concerns at a very similar proposal for 2 Brunel Square.

The text states '*Does not noticeably alter the colour and appearance of the surface*'. Clearly this means that there will be some change of appearance and this is totally unacceptable. One of the special architectural and historic characteristics of the vaults is the attractive stonework and this should not be altered or obscured. No justification for this aspect of the application has been given.

We do not believe that ceiling fans are necessary. Any fixings to the interior must be kept to an absolute minimum therefore anything which is not fully justified cannot be considered as necessary.

There are no drawings showing service runs and their impact on the historic fabric.

Details are included of deep green tiles. There is nothing explaining where these are to go but it is assumed that they may be for use as splashbacks for any food preparation surfaces. Applied to freestanding equipment they may be considered as acceptable, applied to the interior of the historic stonework and they are totally unacceptable. Nothing is to be applied to the stonework which will cause detriment both physically and visually.

Halogen spotlights and uplights are also included. Again no information is given as to where these are to be sited.

The details included for the floor tiles give no idea as to their construction or how they are to be laid. No information is provided as to the existing floor surface, whether historic or new. If a floor slab is to be laid then it should be Limecrete and not concrete which will increase the likelihood of condensation as it does not allow fabric to breathe.

SUMMARY

The works, by virtue of the use of inappropriate materials and methods and the lack of information leaving considerable doubt as to what precisely is proposed are considered to be detrimental to the special architectural and historic interest of the building, adjacent listed buildings and the conservation area contrary to S16 and S72 of the Planning (Listed Buildings & Conservation Areas) Act 1990, Section 12 'Conserving & Enhancing the Historic Environment of the NPPF and Local Plan Policies BH2, BH6 and BH17 and must be refused in its current inadequate form.

The application should be withdrawn and specialist advice sought from the Local Authority specialist conservation officers to ensure more appropriate proposals are submitted when all the details are available.