



## Bath Heritage Watchdog

contact@bathheritagewatchdog.org

APPLICATION NUMBER: 24/00910/LBA

ADDRESS: 3 Park View, Lower Bristol Road, BA2 3EJ

PROPOSAL: External alterations to replace existing pitched roof and insert roof insulation and infill openings to bomb shelters

CASE OFFICER: Marina Del Giudice

DATE: 10 April 2024

COMMENT: Objection

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Bath Heritage Watchdog has a fundamental objection to this application.

The Park View site is one of a small number of locations in Bath where the house is separated from the front garden by the access route which covers a range of addresses. There are similar arrangements for Larkhall Place; and Devonshire Buildings has some addresses with an additional garden or structure across an access path or road. However those examples include the gardens etc in the list entry for the house. That is not the case for Park View which has two list entries: List Entry 1394334 is for the dwellings numbered 1-6, and List Entry 1394338 is for the Garden Walls on the other side of the access footpath.

The Heritage Statement quotes List Entry 1394334 which will cover the works to the roofs of the dwelling. It does not cover the work proposed on the air raid shelters (variously also described as “bomb shelters” and “sheds” in the application documents). The “bomb shelters” are part of the curtilage of the garden walls, not listed with the house. The existence of the two list entries is publicly available from the Historic England website, and it should be part of the documentation when the current owners bought Number 3. **Raising a Listed Building application with alterations to structures not covered by the List Entry it quotes is an offence under Section 11(6) of the Planning (Listed Buildings and Conservation Areas) Act 1990. The application as submitted is therefore invalid** and must be either withdrawn or refused, unless amended by deleting all reference to the proposed work on the air raid shelters. Subject to a Condition that any replacement materials must match the originals, we have no objection to the work on the house itself.

Those shelters need their own planning application with a proper heritage assessment of their background. As a minimum it needs to explain why there a shelter spanning two gardens, resulting in two shelter entrances in the garden of Number 3.

Private shelters built in the style of public shelters will have been quite rare even in the wartime; to have such shelters survive through the 80+ years since built makes them an important and very rare Heritage Asset, and fully justifies the Grade II listing they currently enjoy.

Policy HE1 forbids “*alteration or extension in any manner which would affect its character as a building of special architectural or historic interest*” and requires “*Any harm to the significance of a designated or non-designated heritage asset must be justified. Proposals will be weighed against the public benefits of the proposal*”. Timber and acrylic additions to a brick and concrete historic asset damages its historic interest. There are no public benefits from enlarging the doorways of a pair of structures currently used for storage and which will continue to be used as storage. Therefore that Policy cannot support the choice of materials and will require the alterations to the listed structures to be justified in terms of the public benefit rather than for the benefit of the owners of the garden, or else it must fail Policy HE1 and be refused.

The following pictures provide visual context for the above.



Aerial image from Bing Maps with house numbers added, showing (L to R) Houses, footpath, gardens



Photo taken by previous owner of No.3, showing how small the space between the two shelters is