**21/00695/LBA**

**10 Broad Street City Centre**

Internal and external alterations to enable change of use from school to hotel use.

**21/00692/VAR**

**10 Broad Street City Centre**

Variation of conditions 4, 7, 10, 21, and 22 of application 13/02136/REN (Renewal of application 10/00041/FUL (External and internal alterations and demolitions associated with a change of use from a school to a hotel on first and second floors and a restaurant and bar on ground and lower ground to include ancillary managers accommodation on the lower ground floor).)

*Comment*

The Old King Edward’s School is a Grade II\* mid-18th century detached school building based on designs by Thomas Jelly, situated within the city core of the Bath conservation area and World Heritage Site. It forms the setting for a high concentration of Grade II terraced buildings along Broad Street of a varied age, from early 18th century to mid- to late 19th century. It presents a grand frontage set back from Broad Street behind a stone balustrade with gate posts and decorative stone finials which are independently Grade II listed. The principal elevation is defined by its symmetrical, well-balanced design, and central pediment and fine carving of a heraldic coat of arms. The building contributes to Bath’s backland character visible to both the north and south from Broad Street car park and Milsom Place due to the considerable scale of its rear rubble stone boundary walls and two flanking rear wings to the north and south. The site has been vacant since 1986, and is currently on the Heritage at Risk (HER) register.

The Trust has previously commented in response to applications 13/02136/REN & 13/02293/LBR. We have been supportive of the principle to bring this significant building back into public use but with some reservations regarding the proposed scale of bar use on the ground floor.

We reiterate our ongoing encouragement for the much-needed reuse and conservation of this building to bring it back into sustainable use which would secure its future. Despite previous emergency works to make the roof watertight, the building remains in poor condition and faces continued deterioration if an appropriate use cannot be found. We are keen to see a use that would facilitate public access and reactivate the building within a thriving and varied commercial streetscape.

However, we remain concerned with the proposed scale of the bar and restaurant use on the ground floor. We note that the proposed bar would now be located in the larger south wing ground floor room, and there is a proposed increase in customer capacity in the rear courtyard. We maintain previous concerns that any overconcentration of A3 use (bars, food and drink) will unbalance the character of the Conservation Area, which comprises a mix of retail, residential and leisure uses. Any dominance of A3 use would potentially detract from the character and ambience of the Conservation Area. We query how this apparent attempt to cater to a larger number of customers fits in with current social distancing restrictions which may be in place for the foreseeable future.

We are concerned about proposed external changes to the building that were not previously included within the 2013 consent, such as the addition of a roof plant to the south of the building. The roof plant to be located on the roof of the single storey southern ‘wing’ is of particular concern as this would sit proud of the southern boundary wall and would likely be visible in the backland views of Milsom Place. On the principal east elevation, the roof plant would stick out above the pedimented doorway and be an unwelcome visual intrusion out of character with the formal design of the building’s street-facing elevation. We query why multiple roof plants are required when these weren’t included in any previous consents, and suggest that the design, location, and scale are amended to better mitigate their visual impact to a Grade II\* building.

As part of the relocation of the bar into the original classroom in the south wing, we note the insertion of two new fire doors in the north wall which intersect with two existing niches. The niches are estimated to date to 1821 (Heritage Statement, see Figure 5) but could be older, considering the classroom is noted for its “early layout” (Heritage Statement). A double door opening is additionally proposed in an existing niche in the east wall to facilitate a new access from the original study. The building has already lost of a significant amount of internal historic detailing, and we are concerned that the proposal would result in the further loss of original historic details and historic fabric from one of the principal rooms dating back to the earliest phases of the building. Whilst the Heritage Statement claims this is necessary to improve use, there is no clear justification as to why four fire exits are required instead of two (the double door access does not appear to be labelled for fire exit use on the plans). The provision of fire exits from this room in this number did not form a necessary part of previous consents.

We additionally note the proposed removal of the existing lowered ceiling on the first floor in the south wing to “reinstate historic vaulted ceiling”. There are no further details regarding the proposed works in the Heritage Statement. We have some concerns regarding the lack of clarity as to the age of the suspended ceilings and potential harm to historic fabric. The reveal of the exposed raftered ceiling would be out of character with the typical ceiling treatment in a building of this age and design.

No reference is made within the application as to the potential need for new signage for the advertisement of the commercial premises. The front elevation is noted in the Heritage Statement to be of a “high level of aesthetic value” with existing 19th century signage denoting the building’s historic function as a school. Any new signage would therefore need to be sensitively integrated to prevent cluttering the principal elevation or overriding the central focus of existing, historically contextual signage. We anticipate that any signage proposals would be submitted as a separate listed building application.

In the proposed landscaping site plan, the proposed patio hardstanding is identified as York stone. However, there is no material specification for the treatment of the rest of the courtyard. Considering its current condition we assume that resurfacing works are likely and therefore recommend that the proposed material and finish are indicated as part of this application to enable a full assessment of works within the setting of a Grade II\* building. We additionally note that it is proposed to plant pleached trees along the western edge of the courtyard; from the images provided and the plan, it appears that these trees would be planted directly into the ground as opposed to freestanding above ground planters. The site is located alongside the original route of the Fosseway, a Roman road running from Ilchester to Bath and was formerly occupied by the Black Swan Inn before the school was built. There is consequently a high likelihood of Roman and later archaeological material being found on the site. We strongly suggest that should consent be granted, an archaeological watching brief is conditioned as part of landscaping works to the courtyard.

We note the proposed insertion of a disabled platform lift in the northern boundary wall to facilitate disabled access from Broad Street car park. We maintain that the provision of disabled access is a public benefit that outweighs the less than substantial harm to the boundary wall and is a less invasive option than alterations to the principal on-street access. However, we have some concerns regarding the potential reliance of the building on the adjacent car park, with the creation of a direct access potentially resulting in the ‘annexation’ of public parking spaces for sole use of this premises. We additionally note potential access and traffic issues regarding the rubbish location and barrel drop being located to the front of the building. An increase in delivery and refuse vehicles parked on Broad Street would exacerbate ongoing traffic issues and be of detriment to the public and visual amenity of the conservation area, and we query whether this could be located to Broad Street car park in a similar fashion to existing hospitality premises. We therefore strongly recommend that a traffic management plan should be submitted, not only for the construction phase, but for the use of the building thereafter as well; this should be submitted as part of the application rather than by a condition of any consent.

The Trust remains eager to see this building brought back into public use with much-needed maintenance and repair to ensure the continued material health and integrity of a Grade II\* building. There has previously been a chain of consents for a change of use (see 10/00042/LBA & 13/02293/LBR), but aside from some minor material works, these consents have not been followed through and unfortunately the building has remained vacant despite a potential use having been successfully proposed. The building has remained on the HER register since at least 2010 and is in desperate need of essential repair and maintenance works; should consent be granted, we urge that this is acted upon and works go ahead to ensure the repair and stabilisation of this important local building.