



Historic England

Direct Dial: 0207 973 3627

[REDACTED]
Hastings Borough Council

Muriel Matters House

Our ref: L01433270

Breeds Place

Hastings

TN34 3UY

23 July 2021

Dear [REDACTED]

Arrangements for Handling Heritage Applications Direction 2021

ROMAN BATH, SUMMERFIELDS WOODS, BOHEMIA ROAD, HASTINGS Application No. HS/LB/20/00805

Thank you for your letter of 9 July 2021 regarding the above application for listed building consent. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Historic England Advice

The Roman bath is a mid 19th century bath house comprising a tall sandstone rubble retaining wall with steps either side leading to a viewing platform and Romanesque arch with colonnettes. Behind the arch is a semi-circular grotto with small waterfall cascading into a rectangular pond. It is listed at grade II.

The bath house is part of a series of structures at Summerfields associated with the ornamental gardens and pleasure grounds that were created here by the owner of the former Bohemia House, Wastel Brisco between 1830 and 1850's. The gardens and its features are now all that remains of this early- mid 19th century ornamentally-designed landscape surrounding a mansion, as Bohemia House was demolished in 1972.



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

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The significance of the structure lies in its aesthetic value as a picturesque 'Roman' bath with ornate grotto set into the landscape and taking advantage of a natural spring that emerged from the sandstone rocks. It also has historic value as providing evidence of a former high status house and associated pleasure gardens that previously existed here. It exemplifies the fashion at the time for the development of cold baths or plunge pools associated with the belief in the medicinal qualities of natural springs and bathing. The grotto illustrates the fashion for creating features for whimsy and entertainment, though the whole structure here could also provide shelter from rain or sun or a pleasing halt for refreshment to be served.

The current application is retrospective and seeks to regularise a situation where galvanised steel gates, railings and grill have been erected in the Romanesque archway and lower bath area and around the side steps. The reasons provided for this is that the current condition of the structure is a health and safety risk to the public.

A revised National Planning Policy Framework (NPPF) was issued on 20th July 2021. This sets out the Government's policy with regards to the Historic Environment. Para 197 highlights that in determining applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and that great weight should be given to the conservation of designated heritage assets (paragraph 199).

The NPPF requires that all harm to heritage significance should be avoided where possible or minimised, and that any remaining harm has clear and convincing justification (paragraphs 195 and 200). Harm to the significance of a designated heritage asset should then be weighed against the public benefits of a proposal in the manner set out in para 202.

Local planning authorities should also look for opportunities to enhance or better reveal the significance of the setting of heritage assets (para 206).

Historic England consider that the introduction of these large galvanised metal structures causes a high level of harm to the significance of the listed Roman bath. We deem this to be at the upper end of the less than substantial range under the terms of the NPPF. In addition, we do not think that the harm caused to significance has been adequately assessed to the standard required by paragraph 194 of the NPPF. We have produced a series of Historic Environment Advice Notes which provide detailed, practical advice on how to implement national planning policy and guidance. Historic England Advice Note 12 - Statements of Heritage Significance sets out the information that applicants should provide in order to enable Local Planning Authorities to be able to determine the application.



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We agree with the Sussex Gardens Trust (SGT) that the introduced metal gates and grill are entirely unsympathetic to the appearance of the sandstone 'Roman' bath-house and its setting. We understand the issues around safety to the public however a more sensitive and sympathetic way of protecting the bath house until it has been repaired and made safe should have been explored and implemented. We therefore do not think that these protection measures should remain in place and especially for any lengthy period of time given the level of harm they are causing.

We recommend that the local authority, as a responsible owner of a listed structure, should start a programme to investigate and implement the necessary repairs that required to preserve its condition and appearance. We note that the SGT has offered to work with Hastings Borough Council to help find better short-term and longer-term solutions to meet health and safety requirements and enhance heritage value. They have also explained that they may be able to offer some potential grant funding to undertake a costed conditions survey. Following this a phased programme of repair work should then be carried out to firstly undertake the most urgent repairs first so the structure can be made safe and then the repairs needed to restore the listed building to its original condition where it can be a real asset to the town.

Recommendation

Historic England has concerns regarding the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 195, 197, 199, 200 and 206 of the NPPF.

In determining this application you should bear in mind the statutory duty of section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

[Redacted signature]

[Redacted name and title]



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