**20/04760/EFUL**

**Former Bath Press Premises, Lower Bristol Road, Westmoreland, Bath, Bath And North East Somerset**

Development of the site to provide a residential-led mixed-use development, comprising 286 residential units (Use Class C3) and provision of commercial floor space at ground floor level (Use Class E), demolition of existing chimney, provision of three substations, together with associated infrastructure, landscaping, plant equipment, car and cycle parking, and access.

*Objection*

The proposed site of development is the former Bath Press, the location of the Pitman Press from 1859, situated within the Bath World Heritage Site and the indicative townscape setting of the Bath conservation area. It is situated within the vicinity of multiple Grade II listed Victorian residential terraces, including 17-29 Denmark Street, 1-27 Victoria Buildings, 1-6 Park View, and 30-32 Belvoir Castle. The façade dates to the early 20th century, with the north-west corner featuring a 1912-1913 4-bay façade designed by C. Bryan Oliver, which was later extended in 1919-1926 by Oatley and Lawrence to encompass the existing 32-bay façade in an Art Deco take on the Classical form. The former Bath Press has since been recognised as a Non-Designated Heritage Asset (NDHA) due to its important aesthetic and architectural contribution to the distinctive appearance and character of the localised Lower Bristol Road townscape and its evidential indicator of Bath’s post-19th century industrial and social history.

Application 15/02162/EFUL for the redevelopment of the site to provide a residential-led mixed-use development of 244 dwellings was permitted in 2016. The former Bath Press buildings were demolished in 2017, with the exception of the retained Lower Bristol Road frontage, porticoed entrance, and chimney.

We note this new proposal is very similar with regards to the proposed materiality, design, form, and massing of the 2015 permitted scheme, with some minor alterations regarding the reorientation of blocks and the further articulation of the roofscape. We therefore maintain our comments as previous.

We continue to welcome the principle of developing this brownfield site for residential use, especially as family homes are to be included. We commend the creation of residential spaces that meet or exceed the Nationally Described Space Standard to ensure a good level of residential amenity across all housing types across the site.

However, we are unable to support this application on grounds of the proposed removal of the chimney from the Lower Bristol Road façade without adequate justification or consideration to the scale of any harm or loss and the significance of the heritage asset, and resulting harm to the character and appearance of the townscape area due to the removal of a prominent local landmark. We maintain further concerns regarding the absence of any on-site affordable housing provision.

**Harm to a NDHA**

Within the Heritage Statement, the surviving Bath Press façade is identified as retaining *“the primary architectural and historic interest of the building”*, a notable feature of which is the stone boiler chimney. The chimney is dated to 1919 and therefore features as part of the earlier historic fabric of the building, distinct from the 1925-1929 façade extension to the south-west corner. Furthermore, the Heritage Statement highlights this as a *“historically sensitive [element] of special architectural or historic interest”* and an *“integral and valuable [part] of the heritage asset and [is] extremely sensitive to change”* along with other distinguishing features such as the dual porticoed access points. The chimney is noted as having a *“landmark presence in the streetscape”* due to its scale, form, and public visibility from along Lower Bristol Road. Similarly, the 20th Century Society previously identified the chimney as *“one of the most important features of the building providing important vertical interest to contrast with the long front elevation”* (see 15/02162/EFUL response dated 02/11/2015).

Therefore, the Trust opposes the proposed removal of the chimney to allow for the provision of an unspecified number of apartments. The Heritage Statement acknowledges that *“the loss of the chimney will result in harm to the significance of the non-designated heritage”*; however, it goes on to claim that the loss *“will not entirely vitiate the significance of the structure given the remaining elements of the façade which are to be retained as part of the site’s redevelopment”.* We maintain that the harm caused by the removal of the chimney, whilst not **entirely** vitiating the significance of the retained façade, would result in the significant impairment and loss of the site’s aesthetic, architectural, and evidential value due to the loss of a significant and distinctive street feature in its entirety and the removal of a focal visual point of horizontal emphasis and prominent local landmark. We maintain that simply because part of the façade’s significance as a NDHA is retained, this does not adequately justify the proposed loss of a sensitive historic feature of high visibility in mid-range views along Lower Bristol Road, or mitigate harm to the significance of a NDHA and resulting harm to the broader character and appearance of the indicative townscape setting of the conservation area.

The reasons given for the chimney’s removal in the Planning Statement is to ensure the viable delivery of residential accommodation across the site. There is no further elaboration as to how the chimney’s removal is unavoidable for viable housing delivery and no details are provided regarding the number of apartments that would be delivered in its place. From the proposed plans, the Trust estimates the chimney’s removal could enable the delivery of 2x 3-bed, 1x 2-bed, and 1-2x 1-bed apartments; it is unclear as to how the viability of this scheme is dependent on a total, possible delivery of 4-5 additional apartments. However, the officer’s pre-application report in the Planning Statement notes that the proposed removal is due to “stability and maintenance issues” that have not been addressed as part of this application.

Therefore, we do not consider that the loss of the chimney has been justified or appropriately balanced against the scale of any harm or loss in accordance with para. 197 of the NPPF. We maintain the chimney’s significance as a local landmark in the street scene and on the principal approach into the Bath conservation area, the removal of which would significantly compromise the architectural and evidential significance of the façade of a NDHA as a whole. Furthermore, the chimney’s loss would detract from the wider role it plays in reflecting the importance of Bath’s industrial history and associated architectural features, such as tall chimney stacks which were once a more common feature of the historic city. Its removal would constitute harm to local distinctiveness and townscape appearance and character.

**Affordable Housing**

We are concerned to see that no affordable housing would be provided as part of this proposal within an area of 30% affordable housing provision requirement, despite the previous permission being granted with the obligation to deliver 16% affordable housing. We note that there is no indication as to how the viability of housing provision on the site has changed since approval in 2016 to prevent the viable delivery of 16% affordable housing, already a significant reduction from the expected on-site provision of 30%.

In accordance with Policy CP9 of the Core Strategy and Placemaking Plan, *“viability of the proposed development should be taken into account, including… whether there are exceptional build or other development costs.”* This is not appropriately demonstrated as part of this application. We maintain that Covid-19 should not qualify as an ‘exceptional’ circumstance since this has resulted in a blanket impact on all forms of development and is therefore not exclusive to this site.

We encourage that further documentation should be submitted as requested by the case officer, such as an Affordable Housing Statement, to enable a fully-informed assessment of the viability of the scheme. We strongly recommend that it is made clear as to why this site can no longer support the 16% previously agreed in 2016.

**Other Design Considerations**

We regret the loss of the pedestrian access to the south towards Oldfield Park Station. We maintain that the development should link up with its existing context and allow for an increased permeability of the area to successfully integrate with its urban fabric, in accordance with Policy D3 of the Core Strategy and Placemaking Plan. We feel this application offers a beneficial opportunity for the creation of pedestrian pathways through a previously closed-off site, as well as providing easy access to forms of sustainable transport within the vicinity, such as Oldfield Park Station. We therefore encourage reconsideration regarding how the site as proposed would connect with its residential setting.

**Conclusion**

In its current form, this application proposes unjustified and unbalanced harm to a NDHA, unmitigated harm to local distinctiveness, and harm to the appearance and character of the indicative townscape setting of the conservation area, along the primary approach into the conservation area contrary to Section 16 of the NPPF and Policies B1, BD1, CP6, D1, D2, CP9, and HE1 of the Core Strategy and Placemaking Plan. We strongly recommend that the chimney is retained and integrated within the scheme as part of the façade.