**21/05672/EFUL**

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

Redevelopment of the site to provide a residential-led mixed-use development, comprising residential units (Class C3 Use) and provision of office floor space at ground floor level (Class E(g)(i) Use), provision of three substations, together with associated infrastructure, landscaping, plant equipment, car and cycle parking and access (Resubmission).

*Comment*

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

BPT previously objected to application 20/04760/EFUL on grounds of 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. This application was later refused at Planning Committee for the following reasons:

* Insufficient office floor space.
* Loss of chimney and associated harm to NDHA.
* Non-policy compliant parking provision.
* Lack of connection to south

We are therefore pleased to see that these concerns have been considered as part of this resubmitted application, and in particular the retention of the chimney which forms a significant aspect of the surviving early 20th century façade along Lower Bristol Road.

Similarly, we consider that the new southern connection would allow for cyclist and pedestrian access through the site and better facilitate the integration of this new development with its residential context.

As previously stated in response to application 20/04760/EFUL, 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 maintain strong concerns regarding the proposed intersection of the new development with the retained historic façade and chimney.

We had similar concerns in response to the proposed elevational treatment in permitted application 15/02162/EFUL. In response to BPT’s comments regarding the cramped visual relationship between Buildings J & G and the landmark qualities of the chimney, the design was revised to push back the east, south, and west elevations directly enclosing the chimney so as to give it additional ‘breathing space’. The chimney was proposed to be incorporated into the building at ground floor level, but emerged from the first floor as part of the proposed terrace amenity space behind the original Bath Press façade and therefore maintained some spatial and material distance from its built-up setting. Despite this, at the time we maintained that “the prominence of the chimney is compromised by the close proximity and height of the development surrounding it (either side and the taller building behind). The heights and position of these building would dominate the chimney and detract from its value as a local landmark and harm the visual significance of the chimney in the street scene.”

In comparison, this current proposal greatly imposes upon the ‘freestanding’ landmark qualities of the chimney by enclosing it within the body of Building G up to the third floor. The proposed treatment of Building G’s façade creates an unbroken shoulder height line along the full extent of the new block, visibly encapsulating the chimney within the bulk of the new build and aesthetically and materially pushing it back from the Bath Press façade. Consequently, this more extreme form of enclosure disturbs the legibility of the chimney as part of the original Press building and instead ‘locks’ it within the new build, whilst its distinctive landmark presence is significantly overshadowed by the mass, scale, and close proximity of the surrounding buildings.

It is unclear as to how this treatment would physically affect the chimney and its historic fabric, and we recommend that further details are provided regarding how development would interact the chimney and whether any fixings are required (from the proposed plans, it appears that the chimney would be boxed in?).

We therefore maintain that the proposed scale and close proximity of the surrounding development would be of harm to the architectural and landmark qualities of the chimney as a NDHA.

We maintain our surprise that the provision of affordable housing is not viable as part of a significant, large-scale development with a proposed delivery of 277 dwellings. This is despite being located within an area of 30% affordable housing provision requirement, and on one of the few sites of brownfield land within Bath that offers a significant opportunity to meet local housing demand and address the inequity of housing type provision across the district.

The viability of affordable housing as part of this latest application has not been considered, and instead the position adopted as part of application 20/04760/EFUL has been repeated – that “delivery of affordable housing on-site would make the development unviable, therefore no affordable housing is proposed”. The Planning Statement goes on to justify this retained position: “as the proposed changes to the refused scheme involve reducing the number of residential units and retaining the chimney (resulting in ongoing maintenance costs), the viability position is therefore worse than that of the refused scheme.” We argue that based on the overall scale of this development, a reduction in 7 apartments cannot conclusively justify the apparent worsening viability of development. The provision of 244 homes on site and the retention of the historic chimney were permitted as part of application 15/02162/EFUL with the expectation of 16% affordable housing provision, already short of policy standards.

We therefore second the conclusion of Housing Services that the viability statement needs to be retested against this latest application. We also note that the “sunk costs” described in 20/04760/EFUL’s financial viability assessment should be excluded from future considerations as unrecovered, past costs and therefore do not constitute current “abnormal costs” considered as part of the scheme’s current viability.

Therefore, we are supportive of the proposed amendments to the scheme in response to the concerns raised, and we are pleased to see the historic chimney retained. However, we maintain concerns that this scheme proposes unjustified harm to a NDHA and strongly encourage a more harmonious balance between new development and the site’s historic façade. We maintain an in-principle objection to the absence of affordable housing provision on site, contrary to Policy CP9 of the Core Strategy and Placemaking Plan.