**20/04067/FUL**

**Waterworks Cottage, Charlcombe Way, Fairfield Park, Bath, Bath And North East Somerset, BA1 6JZ**

Demolition and replacement of the existing property and erection of two further dwellings

*Objection*

Waterworks Cottage is an unlisted mid-19th century cottage situated within the World Heritage Site, and the indicative townscape setting of the Bath conservation area. The north boundary of the site directly overlooks the Green Belt and the Cotswold AONB, and forms part of the green landscape buffer between the city’s residential fringe and open, undeveloped countryside. In 2017 it was recognised as a Non-Designated Heritage Asset (NDHA) of local historic and social significance relating to the original site of the Charlcombe Water Works Company Ltd (B&NES Pre-Application Report 2017).

The Fairfield Park area is characterised as primarily residential, and an area in which “the special relationship between the city and its surrounding hillsides” (Bath City-wide Character Appraisal) is particularly prominent to the north, and development on the higher slopes retains an open visual character with views out to the surrounding hills. The immediate setting of Waterworks Cottage constitutes early 20th century and interwar mid-density development, typically detached or semi-detached two-storey dwellings with generous front and rear private garden spaces that form a green visual buffer along Charlcombe Way. Consequently, Waterworks Cottage constitutes a standalone remainder of traditional architectural and material vernacular within this localised suburban portion of the city’s periphery which, whilst undergoing some 20th century extensions and remedial works, has retained its historic core.

The Trust opposes this proposal on grounds of the scale, massing, and density of the proposed development constituting overdevelopment of the site, and harm to the indicative townscape setting of the conservation area, Cotswold AONB, and Green Belt. The scheme would not reflect the form, pattern and grain of the surrounding townscape. The proposed design and form of the dwellings would fail to reinforce local distinctiveness and local townscape character, and consequently does not relate to or participate in its residential setting.

**Waterworks Cottage**

Despite claims in the Heritage Statement Addendum, the cottage, identified as “Waterworks” from 1858 (Bath Directory), was originally intended to provide on-site worker accommodation for ongoing maintenance and management of the steam engine from 1849 (Douglas Bernhardt, 2003). In 1881, the cottage was conveyed to Bath Corporation (HM Land Registry), and by 1958, employees of Wessex Water Authority are recorded as taking up residence (Private Records of Mrs J Lee). The dwelling became an individual residential site when it was conveyed to residents Mr & Mrs Lee by Wessex Water Authority in 1986 (HM Land Registry). The cottage therefore appears to retain significant local value as part of the development of the Charlcombe Water Works site, a significance arguably heightened by the building’s rarity considering the demolition of other related built features such as the reservoir and engine house.

In accordance with paragraph 197 of the NPPF, *“the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”*

We note the description of Waterworks Cottage as “antiquated” and “dilapidated”, but there has been no inclusion of a structural survey or condition report to justify this description, or indicate that the cottage could not be suitably altered or retrofitted to enable continued occupation. We further add that the application appears to be incomplete, with the Heritage Statement Addendum making reference to a “previously submitted statement” that does not appear on the planning portal.

We therefore feel that the Heritage Statement Addendum’s argument for the reduced historic importance of the NDHA is unconvincing. Furthermore, the D&A Statement’s claims that the dwelling “has no special architectural merit” on the grounds of its form, scale, and materiality being typical of Bath’ historic, rural residential vernacular are unsubstantiated and do not justify the substantial harm and loss of a NDHA. Consequently, this does not adequately provide a “balanced judgement” against which the proposed development can be weighed, and cannot be considered suitable justification for the total loss of a NDHA.

**Overdevelopment of the Site**

The site as existing retains a strong visual connection with its landscape due to its steep, east-facing slope towards the Lam Brook, and the low profile of Waterworks Cottage allowing unbroken views out across the Lam Brook Valley to Little Solsbury Hill, as well as views immediately north. Whilst not situated within the boundary of the AONB and Green Belt, the largely undeveloped nature of the site has resulted in a soft visual barrier between Bath’s residential periphery and its rural hillside setting. The site retains features indicative of the AONB’s distinctive, rural character such as tall hedgerows which frame the cottage’s streetside presence. Consequently, Waterworks Cottage remains a positive rural contributor to the setting of the Cotswolds AONB, and associated open landscape setting of the World Heritage site; part of its defined OUV is in its green, undeveloped setting, the retention of “open agricultural landscape around the city edges,” (Management Plan 2016-2022) and “fingers of green countryside which stretch right into the city”.

Consequently, development would result in a hard, suburbanised buffer against the boundary of the Green Belt and the AONB, and would obstruct landscape views out across the Lam Brook Valley to Little Solsbury Hill from Charlcombe Way, contrary to the defining characteristics of the area as defined in the Bath City-wide Character Appraisal. The use of the site to provide three dwellings would result in the pushing forward of the south-facing elevations towards the boundary of the development site and the introduction of excessive hard landscaping up against the roadside. Therefore, the urbanising effect of the increased number of dwellings on the site and their associated, suburban boundary treatment would solidify the visual and material barrier between Fairfield Park and its AONB setting to the detriment of its retained rural character, verdant aesthetic, and complementary landscape setting.

The development would be of detriment to Fairfield Park’s existing plan form and associated character. Whilst of a mid-density residential grain, the residential pattern of development incorporates generous private garden spaces for the benefit of residential amenity whilst ensuring a visual openness, both within the area and with its wider indicative setting, is retained. We therefore maintain that the subdivision of the site to provide three dwellings would result in an excessively cramped overdevelopment of the site uncharacteristic of the established streetscape pattern and grain of the area.

We maintain an objection in principle to the proposed volume of residential development on this site, which would have an urbanising effect on an important rural feature of Bath’s periphery and the AONB, and consequently harm the OUV of the picturesque landscape setting of the World Heritage site.

**Design and Appearance**

Whilst proposed dwelling elevations have been provided, we are surprised that there has been no provision of wider proposed context west elevations as taken from Charlcombe Way, or an existing west elevation of Waterworks Cottage for assessment by the LPA. Considering the proposed visual impact and built intensification of the Charlcombe Way streetscape, we strongly feel that further detailed drawings should be submitted before this application can progress further.

In principle, the Trust is not opposed to contemporary design or development that is sensitive to its built and landscape environment. However, we maintain that the proposed design demonstrates a lack of responsiveness to its streetscape setting in its form, articulation, or layout.

The pushing up and forwards of the dwellings towards the roadside is not sympathetic to the steep slope of the site. Both Waterworks Cottage and other dwellings to the east of the Charlcombe Way use the sloped terrain to set development back from the road and maintain a low visual profile, over which direct landscape views have been retained. The garage to the immediate south of the site cannot be considered an acceptable precedent for roadside development. This development would consequently be of sharp visual contrast with its streetscape character and would a prominent, overdominant architectural feature in an area that has been designed to be recessive to its natural topographical features.

We further feel that the proposed use of a flat roof and square, blocky form is detrimental to the character of the area. Hipped and pitched roofs are a typical architectural profile in Fairfield Park that softens the building outline and opens up viewing ‘corridors’ across the valley. Consequently, the combined flat roof profile and high slope position would result in the negative obscuration of landscape views intrinsic to the appearance and character of the Fairfield Park area and a central route into the Bath conservation area, as shown in Photomontage of Viewpoint 2.

We therefore oppose the proposed form, articulation, and layout of the scheme on grounds of detriment to the indicative streetscape character of the conservation area. The proposal would be a prominent, alien addition that doesn’t respond to the topographical qualities of the site, and would close in landscape views with resulting harm to the Green Setting OUV of the World Heritage Site.

**Conclusion**

The Trust opposes the unjustified demolition of a NDHA. By virtue of the scale, massing, and density of the proposed development, this application constitutes overdevelopment of the site, harm to the indicative townscape setting of the conservation area, Cotswold AONB, and Green Belt, and harm to the Green Setting OUV of the World Heritage Site. The form, articulation, and footprint of the development would be contrary to the grain and layout of its setting, and would introduce an overdominant suburbanising influence into the streetscape at odds with the mid-density low profile character of dwellings set low into the hillside. The proposed design and form of the dwellings would fail to reinforce local distinctiveness and local townscape character. This application is therefore contrary to Section 16 of the NPPF, and Policies B1, B4, BD1, CP6, D1, D2, D3, HE1, NE2, and NE2A of the Core Strategy and Placemaking Plan, and should be refused or withdrawn.