**22/04122/FUL**

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

Erection of two detached dwellings with associated means of access, car parking and associated infrastructure following demolition of existing dwelling and outbuilding

*Object*

The proposed development is to be sited on the site of Waterworks Cottage, 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. This is a view that was reinforced in the Inspector’s decision (see APP/F0114/W/21/328366): *“Indeed, the site offers something of a gentle transition between urban Bath and neighbouring open countryside designated for its outstanding natural beauty.”*

The traditional form and layout of Waterworks Cottage and its spacious garden setting positively contribute to the character and appearance of Charlcombe Way and the wider Fairfield Park character area. Part of Bath’s rural periphery, this area is characterised as primarily residential in which “the special relationship between the city and its surrounding hillsides is abundantly clear” (Bath City-wide Character Appraisal). Development on the higher slopes retains an open visual character with views out to the surrounding hills, particularly to the north as the land rises. 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.

It has already been confirmed that the demolition of Waterworks Cottage does not require prior approval (see 22/03249/DEM), and as such could go ahead under Permitted Development. However, based on the planning history of this site in which the original scheme saw the proposed demolition of the cottage to make way for three new-build dwellings (see 20/04067/FUL, drawings dated 30/10/2020), it is evident that the clearance of the cottage is required to open up the site to the scale, layout, and grain of development as proposed. We therefore take this opportunity to reiterate the attributed value of Waterworks Cottage as a Non-Designated Heritage Asset (NDHA) that is associated with the original, 19th century site of the Charlcombe Water Works Company Ltd (B&NES Pre-Application Report 2017). It is indicated to have formed part of the original infrastructure of the Water Works commissioned under the lease of William Powney, and today is one of the only material remnants of the site’s original function, with the exception of a later engine house to the north-east (Kirsten Elliot, Local Look August 2022).

The contribution of the existing cottage to the appearance and character of the townscape is recognised by the conservation officer (see 20/04067/FUL, Locally Listed Heritage Asset Nomination Form). It was concluded that *“[the cottage’s] location, built into a steeply sloping hillside, set within a large garden plot and close to both the AONB and Conservation Area boundaries affords a degree of continuity with the rural character and positively contributes towards the setting for the AONB. Its tall chimneys and traditional roof form provide a distinctive character to the immediate area, as well as being visible in more distant views within this valley.”* In this way, the site as existing is considered to positively contribute to the rural character and grain of the area, as well as in wider landscape views.

In accordance with Policy HE1 of the Core Strategy and Placemaking Plan, *“proposals affecting non-designated heritage assets […] should ensure they are conserved having regard to their significance.”* Where it remains clear that the cottage is subject to demolition to facilitate redevelopment efforts, we maintain that the loss of this NDHA should remain a valid material planning consideration as part of this application, albeit unfortunately of lesser significance due to the extant Demolition Notice on the cottage.

**BPT previously objected to 20/04067/FUL on grounds of the proposed scale, massing, and density of the proposed development, constituting “overdevelopment of the site”. Considering the similarity of proposals in relation to the proposed streetscape presence of Plots 1 & 2, we therefore reiterate strong concerns with the proposed height, form, and design of the dwellings and resulting harm to local distinctiveness and the semi-rural setting of the conservation area, Cotswold AONB, and Green Belt.**

Townscape Impact and Local Views

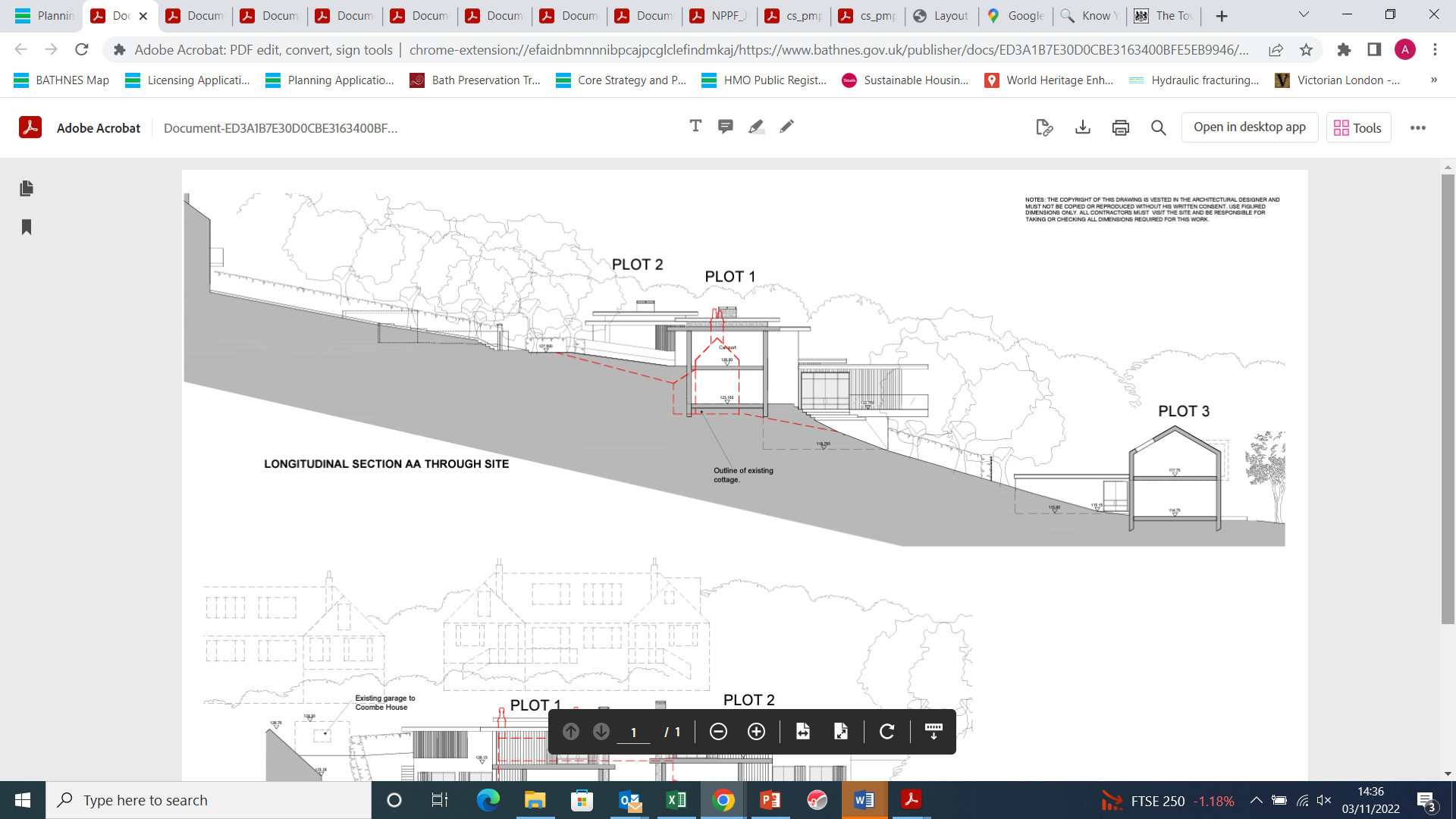
The site as existing retains a strong visual connection with its landscape due to its steep, east-facing slope towards the Lam Brook. The low profile of Waterworks Cottage allowing unbroken views out across the Lam Brook Valley to Little Solsbury Hill, as well as views immediately north. This approach to built form appears to have also been reflected in the low, recessed position of mid-20th century development along Charlcombe Way; however, the effect of this set-down placement has been disturbed by the later addition of late 20th/21st century garages hard up against the road shoulder. The placement of these later built additions is considered to have already resulted in adverse impact to the character of the townscape and its relationship with its wider landscape setting, and is not an appropriate precedent for future development.

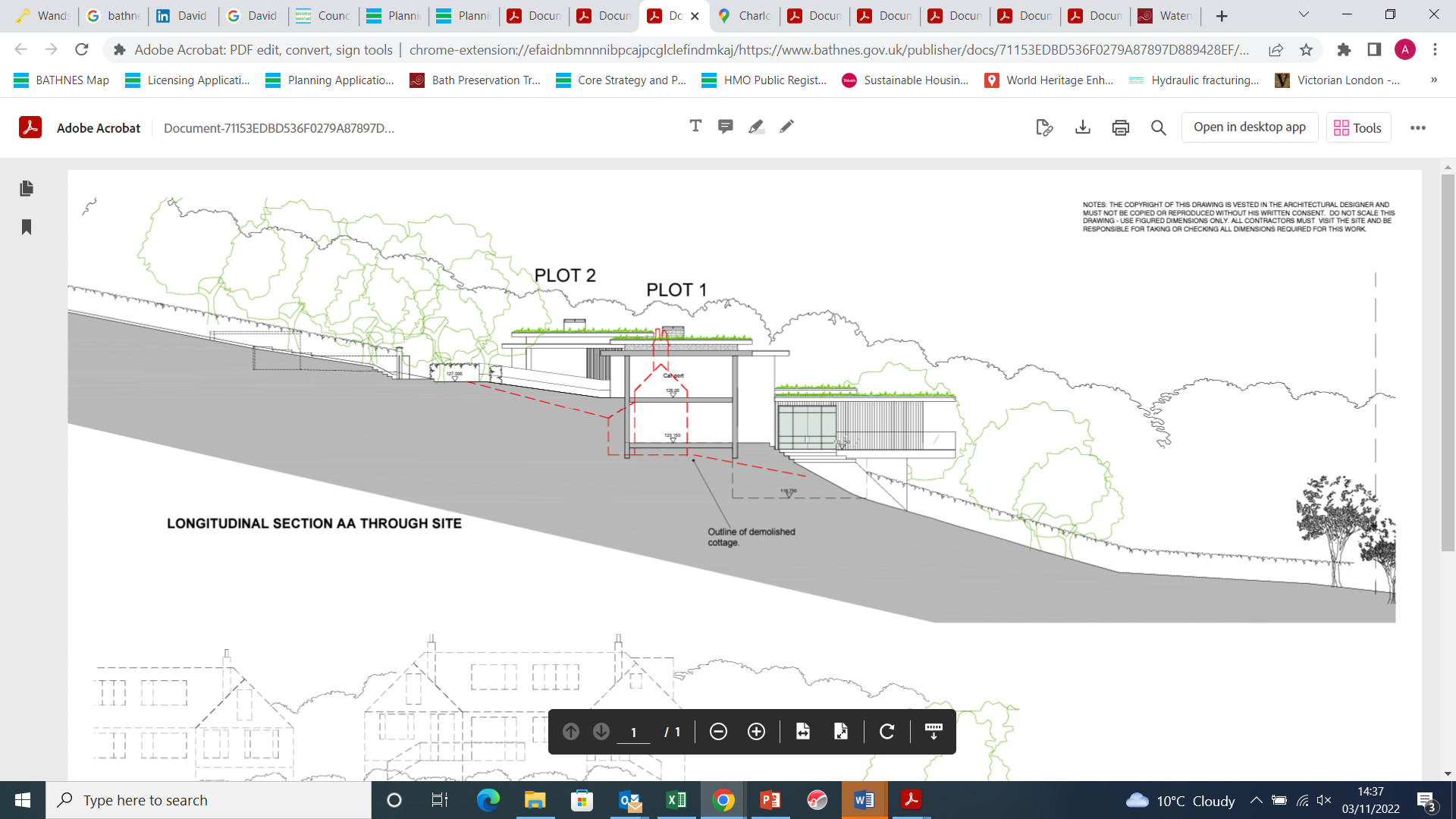
Whilst not situated within the boundary of the AONB and Green Belt, the largely undeveloped nature of the site has resulted in a soft visual barrier between Bath’s residential periphery and its rural hillside setting. The Inspector similarly concluded that the site *“can be observed to exhibit a green and semi-rural character and appearance”* as part of the *“the inherently rural composition of the neighbouring open lands to the north”.* The site retains features indicative of the AONB’s distinctive, rural character such as tall hedgerows which frame the cottage’s streetside presence, and opens up with undeveloped fields and tree belts to the north and east as part of the rural landscape between Bath’s residential fringe and outlying villages such as Charlcombe.

BPT previously highlighted that the open character of the site and its role as part of the transition between Bath’s built environment and landscape setting as part of the green setting OUV of the World Heritage Site, characterised by “open agricultural landscape around the city edges,” (Management Plan 2016-2022) and “fingers of green countryside which stretch right into the city”. However, we acknowledge that the Inspector concluded that previous development would not cause harm to the OUV of the World Heritage Site.

The revised scheme proposes two new dwellings on the site, which is a welcome reduction from the previously proposed three dwellings under 20/04067/FUL. The omission of ‘Plot 3’ from the eastern end of the site would allow for a greater garden allocation per dwelling which would be somewhat more in keeping with the density of neighbouring development. HOWEVER, as per our previous objection response, we maintain strong concerns regarding the build-up of the western roadside elevation and the resulting visual impression of a hard, suburbanised buffer against the boundary of the Green Belt and the AONB. The set-down position of the cottage means that the building is entirely contained within its garden setting; in sharp contrast, the proposed dwellings would immediately abut the roadside with the introduction of excessive, elevated hard landscaping and a solid, flat-roofed form immediately along Charlcombe Way.

We highlight the strong similarities in the proposed roadside treatment with application 20/04067/FUL (dated 30/10/2020) and as such maintain our previous conclusion: that the increased scale and density of development would result in an adverse, urbanising effect on local townscape character, which 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 (see Fig 1).

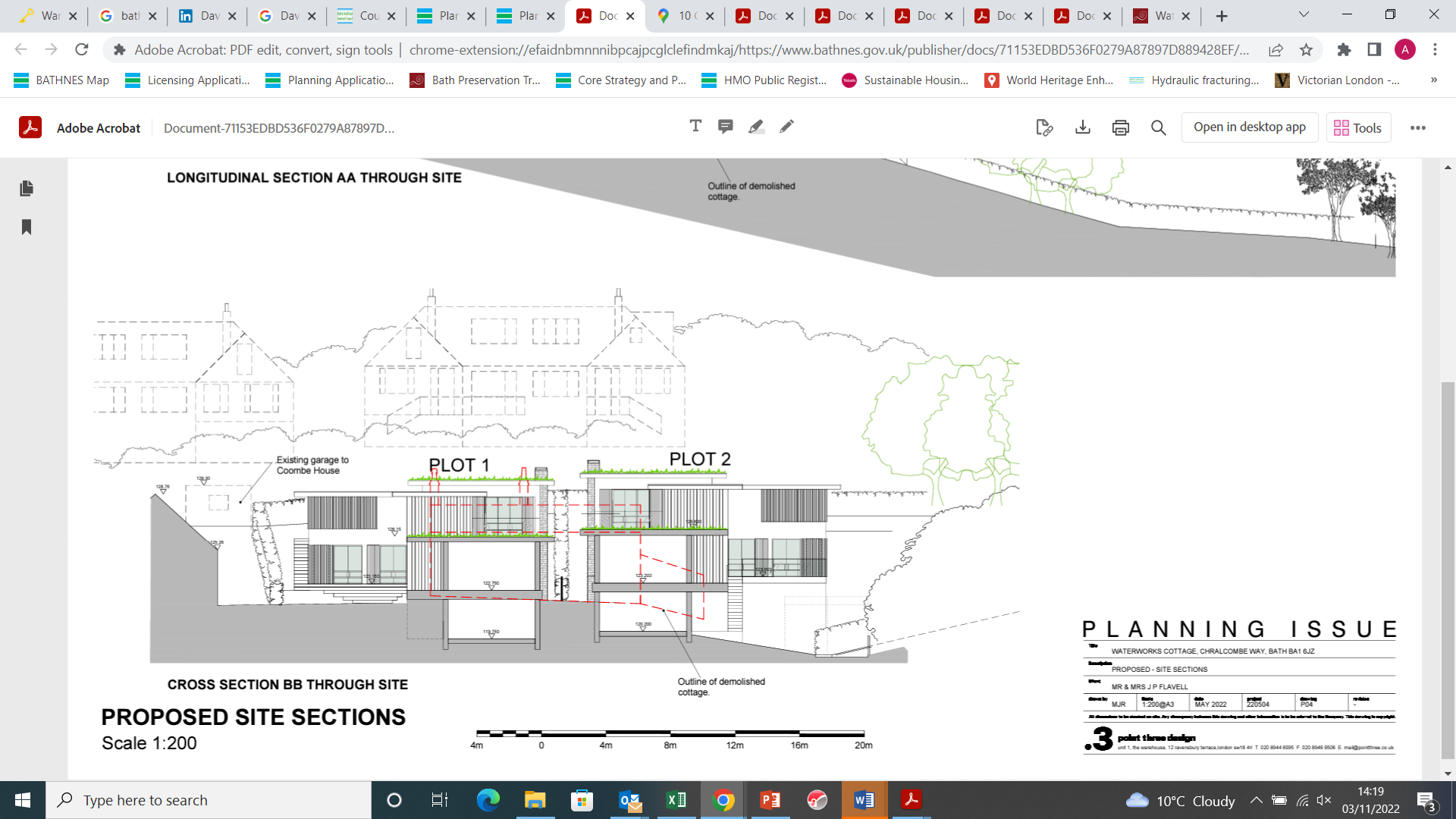


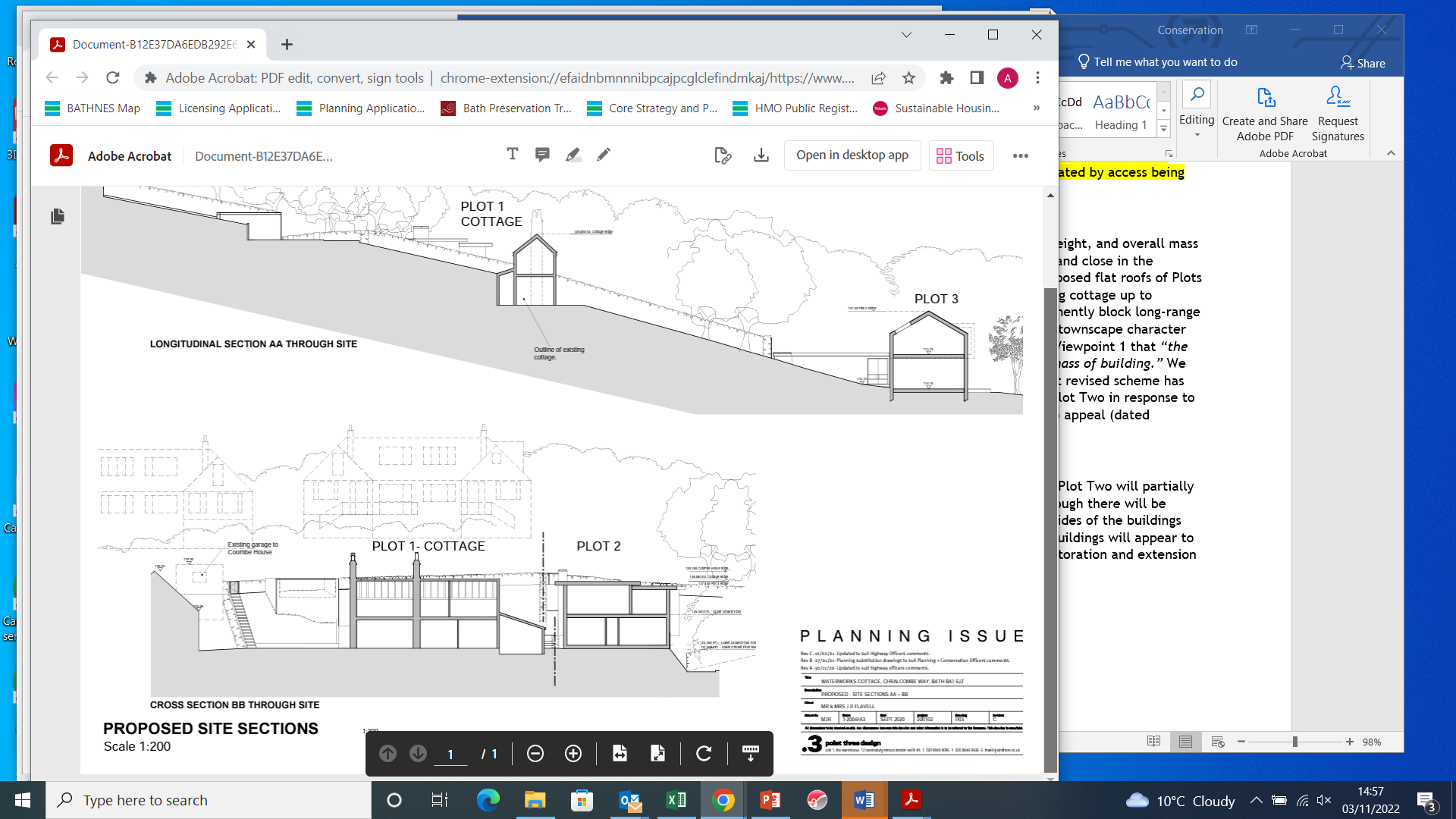


***Fig 1:*** *Above: Proposed Section AA (30/10/2020). Below: Proposed Section AA (11/10/2022). Note the similarity in treatment for proposed Plots 1 & 2 in relation to Charlcombe Way.*

The Inspector previously concluded in relation to Plot 2 that *“this new dwelling would appear as a discordant, cramped and unduly urbanising addition to the streetscene. Indeed, visibility and an erosion of the area’s semi-rural qualities would be promoted via the removal of vegetation necessitated by access being obtained directly from the road.”* We maintain that development would result in equivalent levels of harm to townscape character which would fail to be appropriately outweighed by demonstrated public benefit.

We further highlight that the proposed increase in building scale, height, and overall mass would significantly obscure landscape views from Charlcombe Way and close in the townscape to the direct detriment of local distinctiveness. The proposed flat roofs of Plots 1 & 2 would significantly exceed the roof ridge height of the existing cottage up to “150mm below the top of the existing chimney” and as such permanently block long-range views out to the west which form a distinctive aspect of the area’s townscape character and rural setting (see Appendix 1). The LVIA indicates in relation to Viewpoint 1 that *“the existing pitched roof of the cottage will instead be a rectangular mass of building.”* We do not agree with the statement made in the LVIA that “the current revised scheme has less impact than the previous schemes due to the repositioning of Plot Two in response to the Appeal Inspector’s report.” The previous proposals that went to appeal (dated 16/02/2021; see Fig. 2) indicated that the proposed roof height of Plot 2 would match the established roof ridge line of the cottage, and as such would have been set at a much-reduced height in comparison to current proposals.





***Fig 2:*** *Above: Proposed Section BB (11/10/2022). Below: Proposed Section BB (06/02/2021). Drawing 06/02/2021 indicates a consistent roof height between Waterworks Cottage and Plot 2, in contrast with the proposed increase in roof height in drawing 11/10/2022.*

We therefore remain opposed to the proposed height, scale, and massing of development, particularly as viewed along Charlcombe Way, where this would have an adverse impact on the rural character and landscape views on Bath’s periphery and the setting of the AONB and Green Belt.

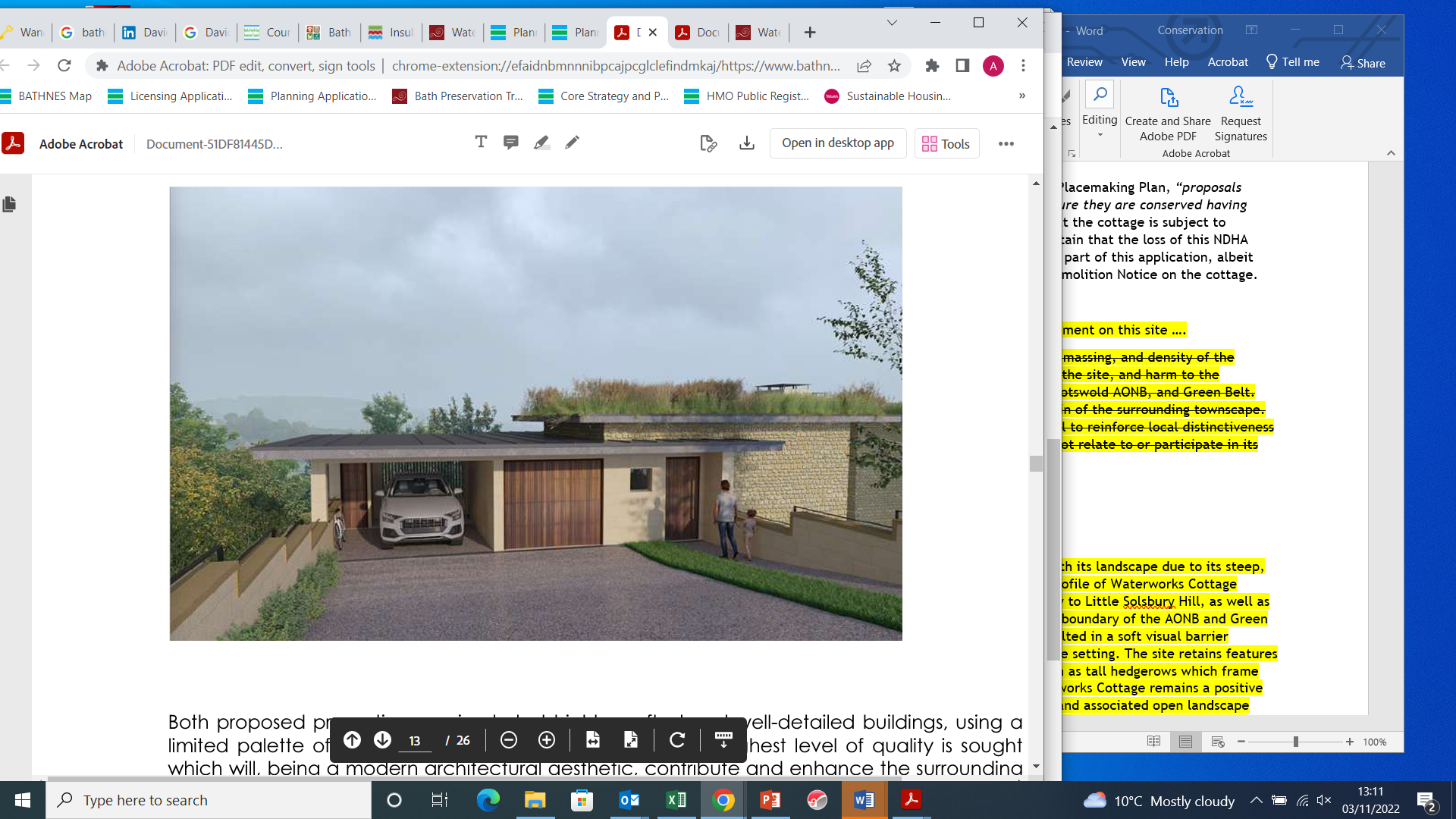
Design and Appearance  
  
Whilst proposed dwelling elevations have been provided, we are surprised that there has been no provision of wider proposed contextual west elevations as taken from Charlcombe Way, or an existing west elevation of Waterworks Cottage for assessment by the LPA. We maintain the importance of considering the site, and any resulting developmental change within the townscape, as a whole. Further detailed drawings should be submitted before this application can progress further.  
  
We continue to emphasise that BPT is not opposed to contemporary design or development which 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. Considering the strong similarity with regards to the proposed design approach, particularly along the western frontage, we maintain our previous comments as follows:

* 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 should not be considered an acceptable precedent for roadside development, where these are already at odds with the recessed positioning of their associated dwellings. The 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 (see Appendix 1).

We therefore continue to 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 semi-rural qualities of the townscape and the setting of the World Heritage Site.

Conclusion  
  
By virtue of the scale, massing, and density of the proposed development, the development proposed 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 over dominant 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. We maintain our in-principle opposition to the proposed demolition of this NDHA. 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.

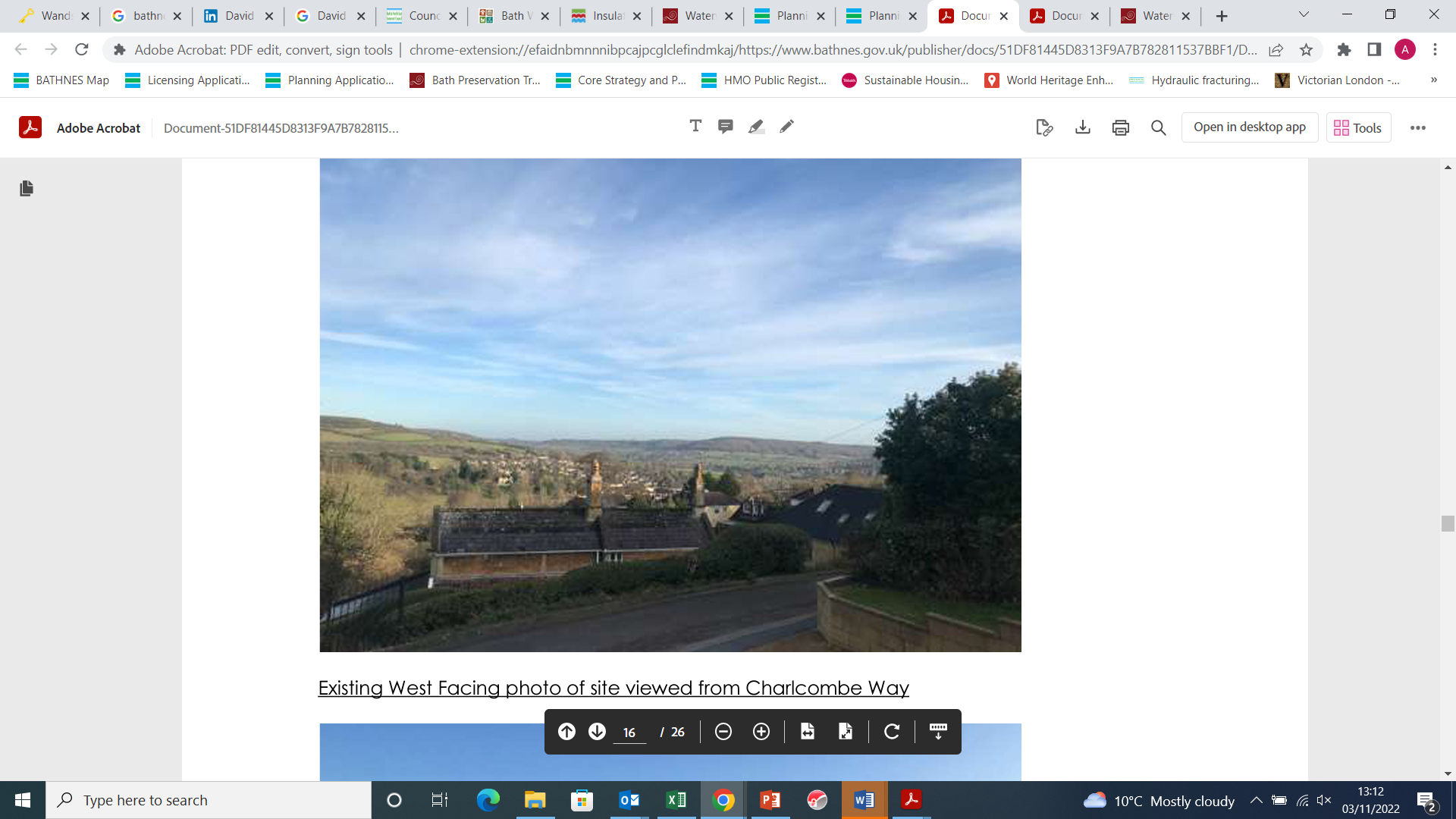
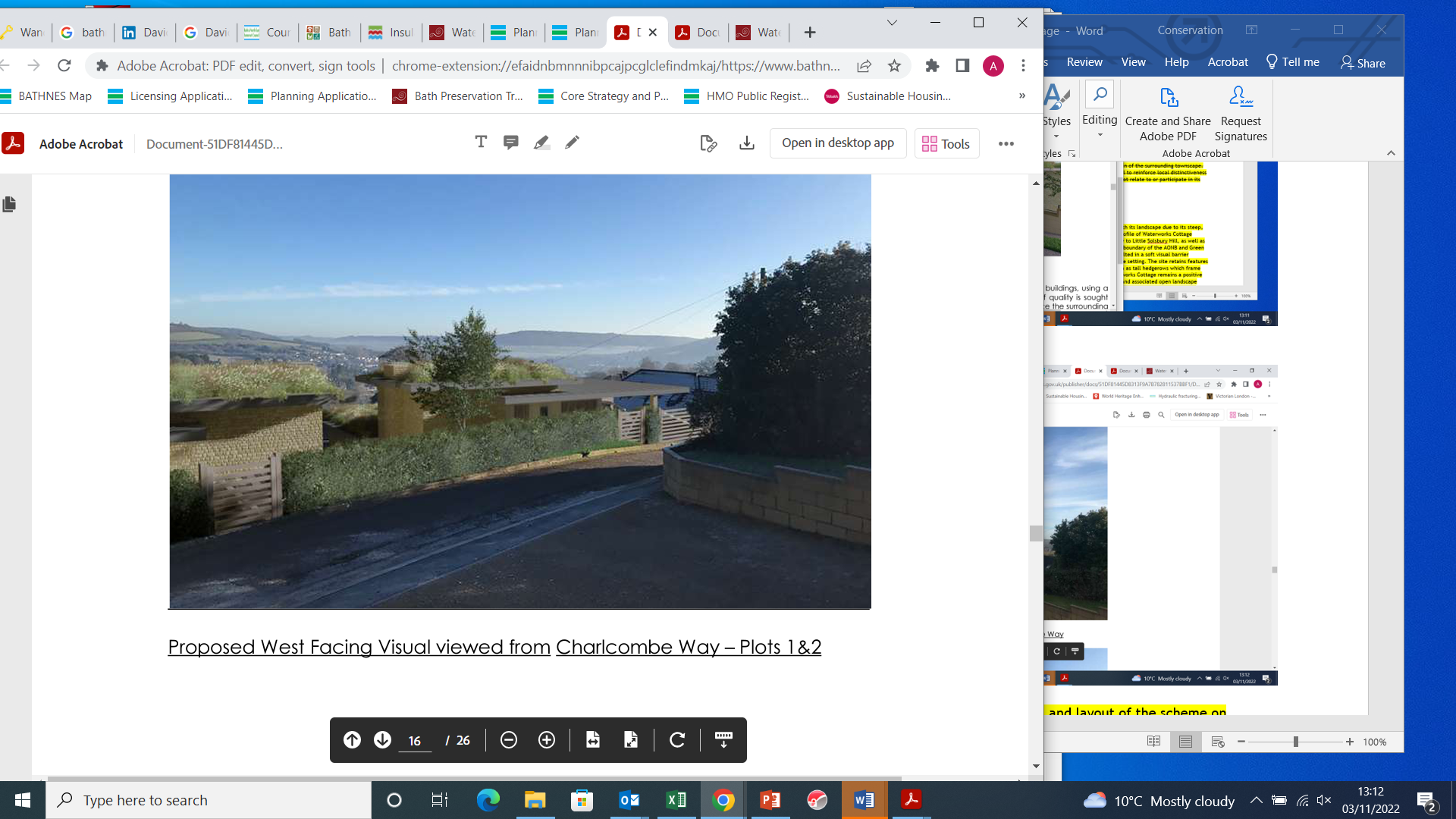
Appendix 1:



*Proposed Visual of Northern Plot from Charlcombe Way (11/10/2022)*



*An approximate equivalent view of the site from Charlcombe Way (Google Street View); whilst views are somewhat obscured by roadside tree planting, public visibility drastically opens up into expansive western views towards the Swainswick Valley.*



*Existing and proposed visuals from Charlcombe Way from Design & Access Statement (11/10/2022) – note the elevated angle of the visual taken from the adjacent driveway does not accurately depict the degree of enclosure and loss of views from Charlcombe Way.*