**23/00895/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 (Resubmission).

*Comment*

BPT continues to reiterate its concerns with the proposed demolition and loss of the 19th century Waterworks Cottage, a Non-Designated Heritage Asset (NDHA) of local interest and a recognisable feature in the street scene. The cottage is attributed historic and indicative significance, strongly associated with the 19th century site of the Charlcombe Water Works Company Ltd. It remains one of the last built indicators of the site, certainly the most visually prominent in publicly experienced views. 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).

We acknowledge that it has already been separately confirmed that the demolition of Waterworks Cottage does not require prior approval (see 22/03249/DEM), and as such can go ahead under Permitted Development Rights. Despite this, we maintain our previous assertions that the demolition of the cottage is directly associated with developmental pressures on the site to facilitate the delivery of two new dwellings, most recently proposed under application 22/04122/FUL (now refused). It remains evident that the clearance of the cottage is required to open up the site to the scale, layout, and grain of development as proposed, and as such remains a material planning consideration.

As part of application 22/04122/FUL’s Delegated Report (27/01/2023), the case officer summarised that the demolition of the cottage would result in *“the total loss of its significance deriving from its historic and architectural interest”*, and would constitute substantial harm in accordance with Section 16 of the NPPF. Whilst the officer concluded that this harm would be acceptable given the extant prior approval for the demolition of the cottage, we maintain that in accordance with Paragraph 203 of the NPPF, *“a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”* Where the harm proposed has been described as substantial, there is insufficient demonstration that the development of two new dwellings would constitute sufficient public benefit to outweigh the demonstrated harm and total loss of the building, particularly where prior application 20/04067/FUL has already demonstrated the feasibility of bringing the cottage back into residential use.

We therefore continue to strongly emphasise the value and positive contribution of the cottage to the local area, and appeal to the applicants for its retention and reuse as a family home with strong, existing ties to the local area, its heritage, and its community.

With regard to the revised design proposals, the reduced scale of Plot 2 and its re-orientation set further down towards the eastern end of the site have gone some way in addressing BPT’s original concerns. The relocation of Plot 2 would mitigate the visual impact of built development and perceived ‘overdevelopment’ along Charlecombe Way. Landscape views would also be retained in the gaps either side of Plot 1. The reduction in the roof height of Plot 1 would be an improvement, though it would remain taller than the ridge height of the existing cottage.

Should the principle of development be considered acceptable, we emphasise the importance of prioritising the delivery of truly sustainable low-carbon housing, in accordance with the local authority’s net zero objectives. We commend the intention to meet 100% of the dwellings’ energy demands with on-site generation, though further practical and technical detail is welcomed (eg. the location of associated infrastructure and batteries for PV panels, should generated energy be used directly by occupants). We further welcome consideration of a ‘whole house’ approach to reduce overall energy consumption and heat loss. The implementation of a sustainable design is a significant consideration in securing adequate public benefit, as well as offsetting the embodied carbon that would be released through the demolition of the cottage. High thermal performance targets as set out in the application should therefore be maintained throughout the design process to secure the delivery of quality, sustainable construction that will contribute to the local area.