



ENGLISH HERITAGE

SOUTH WEST REGION

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Dear Sirs,

B&NES Core Strategy Spatial Options Document

Thank you for providing English Heritage the opportunity to comment on this important stage in the preparation of the B&NES Core Strategy.

In many respects the emerging strategy demonstrates a commendable approach to planning/managing future change within an extremely significant historic environment and, with refinement, may be considered as national good practice in many respects. However, any universal support for the strategy is prejudiced by a number of critical concerns.

English Heritage considers the spatial strategy is currently fundamentally flawed, particularly in relation to suggested locations for urban extensions to the City of Bath, and in its present state we would robustly challenge its soundness.

As you will be aware English Heritage is the government's statutory adviser for the historic environment, and our advice in this correspondence has been made with particular regard to Planning Policy Statement 1 *Delivering Sustainable Development* (2005), Planning Policy Guidance note (PPG) 15 *Planning and the Historic Environment* (1994), PPG16 *Archaeology and Planning* (1990), Circular 07/2009 and associated guidance note, Draft PPS15 *Planning for the Historic Environment* (2009) and the explicit objective of "conserving and enhancing the historic environment through policy and plan-making". We note the material weight of the draft SWRSS and in particular Policy ENV5.

The historic environment is central to B&NES's cultural heritage and sense of identity, and hence a resource that should be sustained for the benefit of present and future generations. Our involvement as a statutory consultee is to ensure the value and significance of this historic environment is fully recognised and its potential

realised in the pursuit of your place-shaping endeavours and, in so doing, achieve a robust and sound Core Strategy.

The following comments respond to the consultation document's layout, order and series of individual questions posed. We hope our suggestions will help to enhance the next version's relative sustainability, coherence and compatibility with national policy.

Spatial Portrait (Pg 15)

English Heritage recommends that the quantitative and qualitative information gathered informs the Districts spatial portrait and in so doing appreciates the relationship of the historic environment to its distinctive character, the local economy and the quality of life of its communities and, as a consequence, provides the basis for you identifying cultural heritage as a key challenge (point 2.17).

Vision (pg 20)

DW1 - We note a Vision for high quality distinctive settlements and landscapes with future development located in sustainable locations across the district. We would, however, suggest the reference to Bath (bullet point 3) reflects the pre-eminence of its historic character/cultural heritage rather than just, apparently, as a matter only to be considered when assessing new development.

Objectives

DW2, 3 - We note the streamlined number of objectives. We would like to suggest Object 5 acknowledges the role and relationship of the district's historic environment and the cultural heritage sector to economic well-being. In addition, as a minor point of clarification we would suggest the addition of 'landscape' to 4.1 to avoid a rather exclusive emphasis on the consideration of specific assets and features, rather than the totality and integrity of the districts built, natural and historic environment.

Spatial Options

DW4 – An understanding of environmental limits/capacity and the consequences for the historic environment should inform spatial preferences.

The role of the evidence base including the setting study and the historic landscape characterisation (prepared for the former Avon area) should be made clear.

We have no objection to critically exploring all opportunities to support the principal of consolidation of settlements across the Districts and to then evaluate their relative impact on the historic environment, amongst other key factors. We do not, however, support a spatial option which advocates urban extensions in locations contrary to national policy.

DW5 – English Heritage considers that B&NES should critically explore/review all alternative possible options/sustainable locations across the district to avoid urban extensions, particularly to the south/south west of Bath affecting the setting of Bath - a specific outstanding universal value of the World Heritage Site. If the Green Belt is to be considered as potentially suitable might the AONB be equally explored? Certainly the case for excluding consideration of sites within the AONB but not sites affecting a specific outstanding universal value of the Bath World Heritage Site's setting has not been made.

The draft SWRSS set you a task to find a suitable site for an urban extension within an area of search to the south west of Bath. You have clearly demonstrated a suitable site cannot be found within this area that does not breach high level national planning policy.

As a consequence, B&NES Council should consider approaching the South West Councils (former Regional Assembly) to explain that following an extensive period of community/stakeholder/statutory agency involvement a suitable site could not be found, and to request the opportunity to further explore an alternative spatial solution that would be in general conformity with the draft SWRSS and its growth targets for the district.

Core Policies

Renewable energy

DW6,7,8 – It should be recognised that poorly considered policies for adaptation and mitigation can have a damaging effect on historic buildings, sites and landscapes. Such impacts can diminish quality of life and the important contribution cultural heritage makes to the district. Therefore to support energy efficiency initiatives and the production of renewable energy, English Heritage recommends that these impacts are always taken into account when policy is being formulated. An SPD would be supported that helped inform the suitable retrofitting of historic buildings.

We would refer you to reference in PPS22 to World Heritage Sites.

DW9, 10, 11, 12, 13, 14 – no comment

Flood risk

DW15 – Policy for flood alleviation/management appears yet to be determined and in view of the considerable land use and historic environment implications for the district, local policy guidance would appear to be appropriate.

Green Infrastructure

DW16/17 – guidance on the preparation for green infrastructure emphasises the need to consider and incorporate historic environment considerations – historic parks and gardens, historic views, rides, cemeteries, archaeology, droveways, green lanes etc. As a consequence it should be referred to as a specific 'element' and historic environment officers should be involved in its preparation.

DW18, 19, 20 - no comment

Highest Quality Urban Design

DW21 – Support, although suggest also includes reference to Streets for All – SW, and proposed Building Heights SPD.

DW22 – no comment

Landscape

DW23 - Support

Historic Environment

DW 24 – Support, although English Heritage would wish to explore the opportunity for a heritage/conservation/historic environment SPD which could address matters

such as Article 4 Directions; a response to Heritage@Risk; historic farmsteads, locally listed buildings (the local list), the use of the setting study etc.

World Heritage Site and its setting

DW25 - English Heritage supports the inclusion of such a policy in accordance with Circular 07/2009.

It may be worth noting that the English Heritage Conservation Principles defines setting as "*the surroundings in which a place is experienced, its local context, embracing present and past relationships to the adjacent landscape*".

We would support inclusion of a buffer policy in accordance with Circular 07/2009. We would however like to suggest a zone is included without a line defining the precise extent of the buffer with policy criteria perhaps included. We are of course happy to discuss this further.

A prosperous economy

DW26 – we refer you to our comments made in relation to the draft Sustainable Growth Alliance Economic Strategy which underplayed the role of the historic environment, cultural heritage sector and tourism to the local economy. Is there an up-to-date Tourism Strategy?

Accessibility and Transport

DW27 – we would encourage reference to the role of enhanced public realm and streetscape in encouraging increased numbers of pedestrians and cyclists. The Bath Public Realm and Movement Strategy should be considered as fundamental to Bath's economic, cultural and environmental well being and in particular movement/transport planning to accommodate significant levels of growth over the next 20 years.

Bath

B1, B2, B3, B4 – broadly support/no comment.

Point 3.20 last bullet. Add "*and historic*" after "*natural*".

B5 – support although the emphasis/order appears to imply priority preference.

The Core Strategy should specify the City of Bath's Outstanding Universal Values.

B6 – acknowledge

B7 – English Heritage strongly object to the fixed notion of an urban extension to Bath. We will provide the justification for seeking alternative spatial solutions elsewhere in this correspondence.

B8, 9, 10 – English Heritage supports the principle of brownfield urban sites to accommodate growth in Bath and support the positive urban design intentions that seek to understand and respond to the World Heritage Site, its Outstanding Universal Values and other significant historic assets. We would strongly encourage the priority phasing of these Brownfield opportunities.

We look forward to participating in the preparation of the Delivery Plan SPDs.

B11, 12 – English Heritage supports an approach that maximises the use of urban opportunities in appropriate locations which are informed by an understanding of the City's environmental capacity, its Outstanding Universal Values, its design constraints and the direct and indirect consequences.

B13, 14 – no comment

Bath Urban Extensions

Stakeholder workshop 30 November/1 December 2009

This invaluable 2 day workshop allowed the capacity assumptions to be critically examined, and demonstrated a catalogue of overriding constraints. We hope a record of the event will help to reevaluate the relative suitability of both suggested sites. The event, and in particular the site visits, demonstrated the following Key issues:

The Twerton site for an urban extension

To the east of the site due to the valley, water course, vegetation, topography and existing holiday park the site would be poorly connected to Twerton whose services and local schools would not be within reasonable walking distance to future residents. The degree of connection with Twerton would therefore be negligible and the anticipated social and spatial connection would not be there. Certainly it would fail to *successfully integrate into the urban fabric of the city* (point 3.20). Any urban extension would therefore need to self sustaining, a stand alone settlement i.e. not an urban extension.

The capacity of the site to accommodate the array of such ancillary uses associated with 2,000 new homes and land for employment uses *to provide a significant employment role* will be affected by the capacity of the site. The site contains nationally significant archaeology and important woodland and the land to the north of the site is extremely steep. This topography accentuates the landscape impact on the Avon Valley, the setting of the World Heritage Site and Kelston Park House (grade II*) with its designated Capability Brown landscape. All the workshop groups considering the site emphasised the significant sensitivity of the historic landscape.

The presentation of the Setting Study at the above event demonstrated the council has prepared a robust and credible evidence base that backs up its conclusion that the Twerton urban extension *would have a major impact on the setting of the World heritage site as the location is highly visually prominent. Development would breach the containment of the existing urban area* (point 3.1.7).

Further to the above event we have considered the relationship of Kelston Park to the site. The unique situation of the house, by John Wood the younger, and its park, isolated on the bluff, is an important landmark from numerous views from within the Avon Valley itself. Kelston was designed as a Country House with commanding views over the countryside. The view towards the south has always been across a green valley, the rural idyll. As the list description of the historic park and garden states, *the house was built on the lip of the southern scarp to exploit the views and the park is the last remaining area of open countryside between the Bath and Bristol conurbations*. The development of the hillside towards Newton St Loe will be visible and erode some of the sense of the House within the countryside and would therefore have an adverse impact on the setting of the listed building.

In effect Kelston Park and the Avon Valley acts as a gateway to the City of Bath, a precursor to the handsome mansions (many by the same architect) in the City of Bath itself. This gateway function will be compromised if large areas of contemporary housing intrude into views of Kelston Park and will compromise its setting as a consequence. We consider the important transition from the rural to the urban and ones sense of arrival will be adversely affected.

The development on the northern slope of the site towards the A4 would be highly visually intrusive in terms of the approach to Bath from the west. The quantum of proposed development would start to erode the character of Bath as a self contained City. As the setting study states, *the city is very self contained, indeed largely hidden from much of the wider countryside due to strong landform features forming visual blocks* (pg 16).

It should be appreciated the purposes of the green belt between Bristol and bath is prevent consolidation and would also suggest development of urban extension would fails one of PPG2's five key purposes i.e. *to preserve the setting and special character of historic towns*.

There is no doubt an urban extension as proposed at the Twerton site would contradict the proposed policy framework in the Core Strategy to protect the setting, authenticity and integrity of the World Heritage Site from adverse effects of inappropriate development.

Likewise the development would fail to conform to draft SWRSS Historic Environment Policy ENV5, PPG2 Green Belt, Circular 07/2009 - Protection of World Heritage Sites nor PPS1 - Delivering Sustainable Development and the specific need to protect and enhance the quality of the natural and historic environment through the planning system, and to ensure that places with national and international designations receive the highest level of protection.

It should be noted that the UNESCO World Heritage Committee has asked to be informed by national governments of proposals for major interventions (such as this urban extension) which may affect the Outstanding Universal Value of a World Heritage Site.

The South Stoke site for an urban extension

Whilst the impact on the setting of Bath is less acute the impact of an urban extension at this site on the Wansdyke and the Fosse Way is however more apparent. Having regard to the Urban Extensions Information Paper, October 2009, there tends to be the suggestion that without prejudice to PPG16 matters of principle, an opportunity may exist to critically explore the potential for development. To do so a more explicit evaluation of the relationship of development to the Fosse Way, Wansdyke and South Stoke Conservation Area needs to be undertaken to establish the relative impact and possible mitigation.

Without prejudice to the above reservations and in particular the issues of considering alternative sites to the urban extensions, we would suggest you reassess the relative impact on the historic environment of both urban extension sites, (currently you favour the Twerton site) and consider the following matters;

- You should consider the relative impact of both options on the Setting of the Bath World Heritage Site – an Outstanding Universal Value of critical

importance in respect to national, regional and local policy and determination of site suitability.

- Unless development at the Twerton site is contained to the south side and does not rise above the ridgeline there would be an unacceptable impact on the setting of the World Heritage Site.
- Might both or either site accommodate more of a modest form of development?

Spatial options for Keynsham

English Heritage welcomes an emphasis on the transformation of the historic town centre. In addition to the sites identified we would support an investigation into whether Keynsham is able to accommodate further growth as a more sustainable alternative to the urban extensions to Bath.

Whitchurch urban extension

We note consideration of the area's historic assets and landscape to ensure an informed allocation. We would encourage the ongoing involvement of historic environment and landscape colleagues, and English Heritage, should this option be progressed.

Midsomer Norton and Radstock

English Heritage supports an emphasis of high quality managed change enhancing the public realm/streetscape, and recognising and responding to cultural heritage. The detail of the Delivery Plan SPDs will need to ensure these principles, generic urban design and historic environment policies are fully reflected.

A greater dispersal of growth across the district, as an alternative to a Bath Urban Extension, may provide these settlements with an opportunity to increase the amount of development currently being considered.

Rural areas

Unfortunately the value and significance of the historic rural landscape appears to have been overlooked. The vision and objectives should acknowledge the importance of the historic environment to the identity and character of the district. The pressures on the cultural heritage of rural areas, the built, natural and historic landscape should be appreciated and managed accordingly. The strategy will need to consider how, for example, historic farmsteads need to be conserved and how traffic management should respect and respond to its landscape sensitivities.

Glossary

We would suggest inclusion of the following

Historic environment

The historic environment is all designated and non-designated features of historic, architectural, archaeological or artistic interest. This includes World Heritage Sites, listed buildings, conservation areas, historic parks and gardens, and scheduled monuments. It also includes their settings; the wider urban and rural landscape and the potential for unrecorded archaeology. The manifestation of an area's heritage assets can be as subtle as the historic street patterns, below ground archaeology and discrete architectural features. It can include key views, settings and those familiar and cherished local scenes. These historic environment features combine to make a vital contribution to a sense of place and local identity.

We do hope our comments will help in the preparation of a sound and sustainable spatial strategy consistent with national planning policy. We trust a continued constructive dialogue with you can help to resolve our concerns.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Rohan Torkildsen', with a long horizontal flourish extending to the right.

Rohan Torkildsen

Territory Planning Adviser (South West/West Midlands)