

Bath and North East Somerset

# New neighbourhood in an urban extension to South / South West Bath



Core Strategy Information Paper  
October 2009

**Planning tomorrow today**

**Bath & North East  
Somerset Council**





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# 1 Aims

1.1 This paper has been written to provide more detailed information about the options for the location of an urban extension to Bath, as found in pages 102-116 of the *B&NES Core Strategy Options Consultation document* (October 2009).

1.2 The aims of this information paper are:

- To provide a summary of the studies and assessments undertaken relating to a possible urban extension to Bath;
- To outline the process through which the options for the location for an urban extension to Bath, as presented in the *Core Strategy options document*, were derived;
- To provide a summary of the assessment work undertaken to evaluate the urban extension options;
- To provide details of the work that the Council has undertaken in relation to the delivery of the urban extension to Bath;
- To identify priorities for further work in preparation for the submission version of the Core Strategy.

## **2 Evidence**

- 2.1 An extensive range of evidence has been gathered and synthesised by the Council to support the Core Strategy. A number of studies and further information notes to support the Core Strategy can be seen on the Council's Local Development Framework webpage: [www.bathnes.gov.uk/corestrategy](http://www.bathnes.gov.uk/corestrategy)
- 2.2 In addition, further research specifically in relation to an urban extension to Bath has been undertaken. A number of studies are still underway, so this information note presents the work undertaken so far. A list of the evidence particularly relevant to the proposals for an urban extension to Bath is listed, by topic at the end of this information paper.

### 3 The Regional Spatial Strategy process

- 3.1 The Regional Spatial Strategy for the South West (RSS) requires the development of an urban extension to Bath. This would constitute a new neighbourhood and should include up to 2,000 new homes and a variety of other facilities including work-places, shops, schools, green space etc. This new neighbourhood would be created by extending the urban area on the south/south western edge of the city. In this section, the way in which the Core Strategy options for an urban extension to Bath were derived will be outlined.

#### ***Early work to inform the Regional Spatial Strategy for the South West (RSS)***

- 3.2 The RSS sets out the government's requirement for an urban extension to Bath. The spatial strategy of an urban extension to Bath to accommodate 1,500 dwellings was proposed in the draft Regional Spatial Strategy in 2006. The potential for an urban extension to Bath was identified in the *First Detailed Proposals* presented to the Regional Assembly by the West of England Partnership. These first detailed proposals were based on the *Joint Study Area Report* undertaken by the West of England Partnership in 2005-2006, which suggested the possibility of an urban extension to Bath, subject to some caveats.

- 3.3 In the Joint Study Area Report potential urban extension options were considered and urban housing capacities were estimated. A spatial strategy identifying broad locations for development, transport and other investment priorities was explored and potential broad areas of search for urban extension development were identified. In preparing the *First Detailed Proposals* the West of England Partnership undertook at an early stage, a sieve mapping exercise identifying constraints to development.

#### ***The Draft Regional Spatial Strategy for the South West***

- 3.4 In 2006, the draft RSS was published for consultation. Policies SR2 and SR3 outlined the requirement for an urban extension to Bath and an area of search was identified (Area of Search E) for up to 1,500 dwellings.
- 3.5 The Council responded to this consultation in depth, outlining its significant concerns regarding the delivery of growth and the spatial distribution set out in the draft RSS. It was reiterated that "studies show that an urban extension to Bath will cause harm to the setting of the World Heritage Site and the surrounding countryside".
- 3.6 However, set against this a Strategic Sustainability Appraisal demonstrated the potential economic and social benefits of an urban extension. In its response to the consultation on the draft RSS, the Council stated that because of the need to provide additional housing opportunities and job growth at Bath that the Council accepted the urban extension(s) within a broad area of search excluding land within the AONB, with a total capacity of about 1,000 dwellings plus additional jobs.
- 3.7 Further issues were raised at this stage regarding: the impact of development on the World Heritage site setting; the Bath and Bradford-upon-Avon Special Area of Conservation; the historic environment including Conservation Areas and the Wansdyke (a Scheduled Ancient Monument); the impact on landscape character;

subsidence and undermining issues and the protection of high grade agricultural land in the Haycombe area.

***Regional Spatial Strategy for the South West Examination in Public***

- 3.8 To inform the RSS examination in public, which followed the consultation on the draft RSS, the Council prepared *Statement (Matter 4/1)* and a number of supporting studies which included:
- An assessment of the capacity of Bath and other areas to accommodate development;
  - A review of the area of search to inform a sub-regional transport study;
  - A landscape and World Heritage study;
  - An Environmental study focusing on the “area of search” for the urban extension to Bath;
  - A Strategic Assessment of the “area of search” considering the sustainability of development;
  - An Environmental study considering the capacity of land within the area of search to accommodate development;
  - An assessment of the wider area surrounding Bath to identify possible urban extension locations;
  - A paper on the importance of the Cotswolds Area of Outstanding Natural Beauty, which supported the Council’s request for the area of search to exclude areas within the Cotswold Area of Outstanding Natural Beauty.
- 3.9 Some of the key elements of this work, together with information about more recent work is summarised below:
- 3.10 *Impact on the setting of the World Heritage Site* - Work undertaken to support the Council at the RSS examination in public, identified that development within the area of search for an urban extension to Bath was likely to have a significant impact on the setting of the City of Bath World Heritage Site. However, at the same time the difficulty of assessing the impact of development on the World Heritage Site was highlighted, given that there was no detailed definition of the setting of the site. The need for further work was identified.
- 3.11 *A Strategic Assessment of the land surrounding Bath* – To fully consider the most sustainable location for an urban extension to Bath, the Council undertook a study to assess the entire periphery of the city. In this study areas beyond the existing urban edge of the city were split up into cells, which were then analysed in turn. Only one of these cells (area 3i) to the north of Bath was considered to avoid high adverse impact across the range of environmental factors explored, including urban design considerations. This location was within the Cotswolds Area of Outstanding Natural Beauty, on the Weston slopes (north). However, this area has not be pursued further as it lies well outside the area of search for an urban extension to Bath.
- 3.12 *Cotswolds Area of Outstanding Natural Beauty* – One of the papers prepared by the Council related to the Cotswold AONB. This included details of the extension of the AONB boundary in 1990. During the review process that led to this extension, it was noted that the modified boundary was defined so that it coincided with the Bristol/Bath Green Belt. As a result of this review, South Stoke Plateau was included



in the AONB. It was noted at the time that this boundary was being modified by the Countryside Commission that “there is no doubt that the quality of the landscape in the areas concerned is not of AONB quality. However, the intention of the Commission’s proposals was to draw the AONB boundary to coincide with that of the Green Belt.” Despite the reasons for designating the AONB boundary it should be noted that all areas within the AONB are afforded the same protection, there are no “second class” parts, under the planning system. Additional details about this review can be found in the Council’s report on the AONB (2006).

- 3.13 In order for any urban extension development to be pursued on land within an AONB, exceptional circumstances would need to be demonstrated. These circumstances would need to be in line with the criteria set out in paragraph 22 of *Planning Policy Statement 7: Sustainable Development in Rural Areas*.

**Examination in Public Panel Report**

- 3.14 The Panel report (December 2007) concluded that the “area of search” for an urban extension to Bath should be widened to include land to the west of Bath up to the A4 (i.e. area to the West of Twerton) and the land within the AONB to the east of the existing area of search (i.e. South Stoke Plateau). The panel also concluded that the provision for 1,500 dwellings should be sought within the widened search area.

**Regional Spatial Strategy Proposed Changes**

- 3.15 Following this, the Proposed Changes to the Regional Spatial Strategy were published for consultation. At this stage, the requirement for the urban extension to Bath was raised to 2,000 dwellings. Furthermore, the area of search appeared to remain unchanged despite the Panel’s recommendations, the Council in its consultation response requested that the area of search be expanded northwards to include land to the west of the city towards the A4. The Council continued to accept the principle of an urban extension to Bath although it challenged the increase in its size.

**Clarification note regarding Regional Spatial Strategy Proposed Changes**

- 3.16 Although the RSS is still not finalised a further clarification note was issued in April 2009. Whilst the “area of search” for the urban extension was not formally altered, it was emphasised that the area of search was indicative. Bath & North East Somerset’s Core Strategy options reflect this approach. As a result of this, the Council has considered a broad area of search as suggested by the examination in public Panel report.
- 3.17 For the purpose of the Core Strategy options, the potential for the locations to yield up to 2,000 dwellings has been considered. This will help consider the maximum capacity of the locations, although the Council’s position in relation to the RSS proposed changes remains unchanged.

**Awaiting the final Regional Spatial Strategy**

- 3.18 The RSS is now awaiting adoption. On 25<sup>th</sup> September 2009 the government announced that it would carry out a new Sustainability Appraisal of the proposed changes. This decision was taken in light of the High Court’s judgement on challenges to the Regional Spatial Strategy for the East of England. Following the results of this appraisal the government will decide how to progress the strategy.

2.19 Despite the fact that no final decision has been made on the Regional Spatial Strategy (RSS) by Government, the Council is required by the Government office for the South West to develop a Core Strategy for Bath & North East Somerset. The B&NES Core Strategy must also adhere to the broad strategy set out in the RSS.

## 4 Generating Options

### *Introduction*

- 4.1 Further work, undertaken alongside and informed by the regional planning process has enabled the Council to identify options for an urban extension to Bath for public consultation. These options are presented in the Core Strategy Options document. A summary of the four stage process undertaken to develop the options for public consultation is outlined in the table below:

Stage	Key Tasks
Stage 1: Identification of possible options	<ul style="list-style-type: none"> <li>• Some parts of the “area of search” were ruled out following a high level assessment led by a consideration of environmental constraints</li> <li>• Three areas were identified for more detailed assessment: (1) West of Twerton (2) Odd Down/South Stoke Plateau and (3) Haycombe.</li> <li>• Planning for Real workshops to consider environmental constraints within the area of search</li> <li>• Commission for Architecture and the Built Environment facilitated 2-day stakeholder workshop considering place-making opportunities and considering sub areas within the “area of search”</li> <li>• At this stage Englishcombe and Rush Hill areas were ruled out</li> </ul>
Stage 2: Assessment of potential options	<ul style="list-style-type: none"> <li>• Using a criteria based approach the three options identified were compared against a set of objectives established by a cross-disciplinary working group</li> <li>• The option of splitting development into smaller parcels within the areas identified was considered, but was later ruled out</li> <li>• Land budget assessment undertaken to establish more detailed site capacity of options</li> <li>• Core Strategy options consultation responses considered</li> <li>• At this stage the Haycombe area was ruled out</li> </ul>
Stage 3: Refinement of options	<ul style="list-style-type: none"> <li>• Draft vision and objectives drafted</li> <li>• Indicative site boundaries were drawn</li> <li>• Strategic Green Belt role assessment</li> <li>• Initial assessment of impact of options on World Heritage Site setting</li> <li>• Consideration in relation to differences between options in relation to future role and function</li> <li>• Strategic Housing Land Availability Assessment undertaken for Bath urban extension (more detail in section 6 of this paper)</li> <li>• Research into infrastructure and delivery issues undertaken (more detail in section 6 of this paper)</li> <li>• Impact Assessments undertaken to compare options (more detail in section 5 of this paper)</li> <li>• Core Strategy options document drafted for presentation to</li> </ul>

	Council
Stage 4: Drafting of Policy options associated with urban extensions	<ul style="list-style-type: none"> <li>• Research undertaken to underpin policy options which relate to policy areas with specific options in relation to urban extensions</li> <li>• Specific policy options in relation to a number of specific areas were also drafted e.g. affordable housing targets, renewable energy targets etc</li> </ul>

4.2 Further detail about each of these stages will now be outlined; in addition, key parts of the evidence base relating to stages in the process will be introduced.

### **Stage 1: Identification of possible options**

- 4.3 Much of the background information needed to analyse the area of search was prepared to support the regional planning process, however, additional information was also gathered. The area of search was also considered through both public consultation and at stakeholder workshops.
- 4.4 At an early stage the Englishcombe and Rush Hill areas were ruled out from further investigation on the basis of a number of key cumulative factors, including:
- The steepness of the slopes in these areas adjoining the existing urban edge means that access and building is difficult. Land instability is also a known issue in this area.
  - Ecological impact: this area has a cluster of sites of nature conservation interest including linear features and woodland, this in turn has a role as a habitat and feeding area for Greater Horseshoe bats
  - Site access is challenging in this location due to topography and the constrained nature of existing access routes
  - Opportunities for public transport accessibility and improvement are considered to be lesser than in other parts of the area of search
  - In broad terms issues such as accessibility and topography were seen to have an impact on development viability at this location
  - Limited interest in development of this area has been received, making it difficult to demonstrate that development here is a deliverable or realistic option
  - There is significant visual and landscape impact of development in these locations
  - The Whiteway road presents issue of severance, between the existing urban edge and the area beyond

### **Stage 1: Key evidence**

- Landscape Heritage Study south/south west Bath
- Landscape Character Appraisal
- Bath City wide Character Appraisal
- Strategic Sustainability Assessments
- Land registry information
- Site visit observations
- Environmental constraints mapping: considering topography, public transport access; ecological designations; historical features; known land instability; land fill/contaminated land information; other planning designations etc
- Planning for Real environmental constraints workshop report
- CABE facilitated 2-day stakeholder workshop report
- Core Strategy options consultation report and representations

## **Stage 2: Assessment of potential options**

- 4.5 Following the Stage 1 assessment, three areas were identified for further assessment:
- West of Twerton
  - Haycombe
  - Odd Down/South Stoke Plateau
- 4.6 These locations were compared using a set of 15 objectives by a multi-disciplinary team with expertise in planning, transport planning, urban design, ecology and the historic environment.
- 4.7 A basic capacity assessment for the locations had also been undertaken and details are included in **Appendix 1**, this demonstrated that the capacity of the Haycombe option was limited. It was considered that the disadvantages of development at this location were seen to significantly outweigh the benefits, particularly in light of the limited capacity of this area, and at this stage Haycombe was ruled out, further details of this assessment is included in **Appendix 1**.
- 4.8 Both the comments received in the Core Strategy consultation and the stakeholder events suggested the need to consider an option of splitting development between a number of smaller sites throughout the area of search was considered. The Sustainability Appraisal process which has been an iterative process informing the drafting of the options supports the view that splitting development into smaller parcels of development has limited advantages
- 4.9 The key reasons for looking to consolidate the urban extension in one location are as follows:
- Preliminary assessments show that the impact on ecology, landscape and World Heritage Site setting is likely to be increased if development is broken into smaller parcels of development across the area of search
  - Infrastructure Providers have told us that splitting development will make it more difficult and more costly to serve in terms of infrastructure.
  - Splitting development will not allow us to reach critical masses needed to sustain new services or local facilities. Furthermore, certain renewable energy technologies rely on a critical mass for viability which can be better achieved where development is consolidated
  - Splitting development is likely to have a greater impact on existing communities. For example, more strain would be placed on existing services and facilities as population thresholds to provide new schools or community facilities might not be achieved.
- 4.10 The option of splitting development is discussed in the Core Strategy options paper, although it is not presented as a feasible option.

### **Key evidence**

- Urban extension environmental capacity report
- Bath Urban extension: Assessment of Broad Location options (**Appendix 1**)
- Core Strategy options Sustainability Appraisal

### **Stage 3: Refinement of options**

- 4.11 Following the Stage 2 assessment two possible options for the location of an urban extension to Bath were identified, these then needed to be refined so that they could be presented as options for consultation:
- West of Twerton (option SWB 1)
  - Odd Down/South Stoke Plateau (option SWB 2)
- 4.12 At this stage the vision and objectives for the new neighbourhood in an urban extension to Bath were drafted drawing on the assessment work undertaken, together with the outputs of the consultation and were informed by the early stages of the Health Impact Assessment and Sustainability Appraisal processes.
- 4.13 Indicative site boundaries were also drawn; these were refined in order to reflect the need to follow readily recognisable features when defining a boundary that would be coterminous with the Green Belt boundary. The rationale for these boundaries in Green Belt terms is considered **Appendix 2**, an initial Green Belt assessment of the two options. This work has informed the comments made within the *Core Strategy Options paper* on this issue.
- 4.14 These boundaries were also informed by work undertaken to establish more detailed considerations about the land take for urban extension development to accommodate up to 2,000 homes and other uses which includes about 20% green space, schools, employment land etc. These land budget assumptions have informed the suggestions about land take and densities which are included in the *Core Strategy Options paper*.
- 4.15 The Council has recently completed a *World Heritage Site Setting study* which allows the impact of development on the World Heritage Site setting to be considered in detail. An initial assessment has been undertaken to consider the urban extension options, this assessment is made available as **Appendix 3** to this paper. Again, this work has informed the comments made within the *Core Strategy Options paper* on this issue.
- 4.16 Some evidence in relation to the potential role and function of an urban extension in each of these locations has been gathered.
- 4.17 In relation to employment land within the urban extension, the Council's *Business Growth and Employment Land study* suggests that "pressures to redevelop employment land for housing" within Bath will lead to the "need for some employment to be relocated" a possible option for this would be the urban extension to Bath. The study goes on to say that the Bath urban extension should have a role in the provision of industrial land in particular, as it "represents an unusual opportunity for greenfield industrial allocation and offers the possibility of Section 106 or similar cross subsidy to enable market pressures for non industrial use to be tempered. It is acknowledged that industrial development in this area is likely to be 'good quality' B1(c), rather than, say, general industrial." (p83).
- 4.18 It is considered that the West of Twerton option, in terms of its location "close to the A4, would be preferable for the bulk of any allocation, providing access to Bristol and Keynsham, and on the more important side of the east/west business corridors

out of Bath”. By comparison, the Odd Down/South Stoke option would principally cater for “the needs of businesses working principally south of Bath (and this market is more limited)” (p93-94). The opportunity for the West of Twerton location to perform a strategic role in employment land provision within Bath is important factor. However, the sensitivity and the visual prominence of the West of Twerton area, must also be considered and in relation to this type of land use. Again, this work has informed the comments made within the *Core Strategy Options paper* on this issue.

- 4.19 The Council has also undertaken a retail study, and this identifies that there is a “need to consider the relationship of proposed urban extensions to existing centres and whether any new centres are required, once the scale and locations for the extensions is finalised.” In addition to this, within Bath the study recommends that an urban extension might be able to have a role in terms of convenience (i.e. principally food) retail.

### Stage 3: Key evidence

- Health Impact Assessment
- Initial Green Belt Assessment (**Appendix 2**)
- Land Budget Model (work ongoing)
- World Heritage Site Setting Study
- Habitat Regulations Assessment
- Initial Summary Assessment of Impact of the options on the World Heritage Site setting (**Appendix 3**)
- Business Growth and Employment Land study
- Retail Study

### Stage 4: Drafting policy options associated with urban extensions

4.3 A number of evidence based policy options specifically relating to the urban extensions have been drafted for public consultation and are outlined on pages 115-116 of the *Core Strategy options document*.

### Stage 4: Key Evidence

- Renewable energy study
- Strategic Flood Risk Assessments
- Green Infrastructure Strategy (emerging)
- Strategic Housing Market Assessment
- Transport modelling (underway)
- World Heritage Site Management Plan
- World Heritage Site Setting study



## 5 Summary of the assessment work undertaken to evaluate the options

- 5.1 The Core Strategy options, including the options for a new neighbourhood in an urban extension to Bath have been through a number of appraisals, many of which are statutory. Comments on these interim appraisals are welcomed during the consultation period, some key points from each of the appraisals are summarised below.

### ***Sustainability Appraisal***

- 5.2 An interim Sustainability Appraisal that incorporates Strategic Environmental Assessment has been undertaken to assess the Core Strategy spatial options. This has been an iterative process that has informed the generation of options. The aim of this process is to promote sustainable development in plan making.
- 5.3 A number of recommendations are made regarding the Bath urban extension in relation to both the vision and objectives, and the options themselves. Key recommendations relate to ecology, climate change resilience, waste and sustainable construction.
- 5.4 The Sustainability Appraisal concludes that both option SWB 1 (West of Twerton) and SWB 2 (Odd Down/South Stoke) have their own merits and disadvantages in terms of sustainability and that no one option out performs the other. The report concludes that option SWB 1 presents the most secure delivery of up to 2,000 homes.

### ***Habitat Regulations Assessment***

- 5.5 A Habitat Regulations Assessment of the Core Strategy has been undertaken to identify any options which raise concerns in relation to the Habitat Regulations. This detailed screening assessment has identified concerns in relation to an urban extension to Bath, possible effects of urban extension development in combination with other development is also identified.
- 5.6 The assessment identifies the potential for infrastructure required for an urban extension to Bath, in particular transport infrastructure, to “impinge on NK2 sites or associated features”. However, it is noted that “transport modelling to date indicates that no major new highway schemes will be required” and that “transport packages based upon public transport and improvement to existing transport corridors are the focus”. As this is still an area of uncertainty the “precautionary approach” has been applied, therefore, “it must be assumed that a significant effect to NK2 sites is likely”.
- 5.7 Concern is also raised specifically in relation to “specific spatial options associated with the South West Bath urban extension” affecting a component of the Bath and Bradford upon Avon Special Area of Conservation. The report concludes that a site allocation of Option SWB 2 (Odd Down/South Stoke Plateau) could result in a likely significant effect to the Bath and Bradford-upon-Avon Special Area of Conservation (SAC). However, it is considered that it might be possible to mitigate this impact or avoid this outcome. Although, without this mitigation being secured as part of the development requirements this option would be difficult to pursue.

- 5.8 A possible “in combination” effect is noted in relation to the proposed allocation of the Fullers Earth works, Odd Down as a waste recovery site and an urban extension to Bath.
- 5.9 The assessment provides further details about the Bath and Bradford-upon-Avon SAC. Commentary on the scope to avoid, cancel or reduce the effects on the SAC is also discussed in further detail. Detailed Horseshoe Bat foraging studies have been undertaken to underpin this Habitat Regulations Assessment.

***Health Impact Assessment***

- 5.10 A Health Impact Assessment of the Core Strategy options has been undertaken to identify the possible health impacts and make recommendations as to how the positive health consequences can be enhanced and how the negative consequences can be avoided or minimised.
- 5.11 The appraisal concludes that the vision for the new neighbourhood at south/south west Bath contains good references to health and factors which are likely to support healthy lifestyles, and that: “These include access to local food production, sustainable transport, reference to high quality urban design supporting inclusion, safety and healthy lifestyles, reference to playing a role in supporting regeneration of relatively deprived areas in south Bath and reference to enhancing access to green space and the countryside, which will have benefits for physical activity and mental wellbeing.”
- 5.12 The assessment concludes the West of Twerton option for an urban extension holds the best potential to be realised and for promoting health and well being. A number of specific recommendations in relation to the urban extension options and the draft vision and objectives are also outlined in the report.

## 6 Delivery

- 6.1 *Planning Policy Statement 12: Creating Strong Safe and Prosperous Communities through Local Spatial Planning* emphasises that proposals contained within the Core Strategy need to be deliverable. The Core Strategy will need to demonstrate that the urban extension options are deliverable in terms of phasing, infrastructure and that the land required for development is available.

### **Phasing**

- 6.2 The Council has expressed a clear strategy for brownfield development within the district to be prioritised above greenfield development. It is also necessary for infrastructure required to support any urban extension to Bath to be provided at the outset before any substantial development takes place.
- 6.3 It is proposed that the urban extension to Bath would be phased towards the end of the plan period. However, it is acknowledged that there will be a long lead in time to deliver this level of development and to secure appropriate infrastructure. A development trajectory with details of phasing of development across the district will need to be prepared alongside the submission version of the Core Strategy.

### **Infrastructure Requirements**

- 6.4 Evidence of the physical, social and green infrastructure needed to enable the amount of development proposed in any urban extension to Bath will be required to support the allocation of a Strategic Site in the Core Strategy. This evidence will need to cover who will provide the infrastructure, together of details about where and when it will be provided.
- 6.5 An Infrastructure Delivery Plan for the Core Strategy is being prepared which will include the specific infrastructure requirements for any urban extension options. Work on the Infrastructure Delivery Plan has already started. The Council has also been working with the West of England authorities to consider the major infrastructure requirements needed for the key development sites within the sub-region. This has included consideration of the infrastructure requirements of an urban extension to Bath of up to 2,000 dwellings.
- 6.6 A West of England Infrastructure Delivery Study led by Roger Tym and Partners is underway (anticipated publication November 2009) . This study is assessing the infrastructure issues in relation to the Bath urban extension focusing on three key areas in detail, some of the key findings in relation to these areas are summarised below:

(1) Transport	A Bath urban extension transport package is yet to be identified; however, the Council has commissioned strategic transport modelling work to examine the effectiveness of potential strategic transport interventions. The requirements of a Bath urban extension transport package are yet to be established, but the primary interventions being explored are public transport based. Due to the lead in time to secure necessary funding and the need to have a transport package in place prior to development, it is assumed that enabling transport infrastructure is unlikely to be completed before 2016.
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(2) Education;	Development of up to 2,000 houses is likely to necessitate primary school provision within the new neighbourhood. It would not necessitate secondary school provision as the catchment areas are much wider. The Council is currently considering how secondary education is delivered in the district and any plan for an urban extension to Bath will be considered as part of this. Surplus places in existing schools will also need to be considered, where this exists.
(3) Open Space, Parks & Leisure.	The Council has completed a PPG17 compliant Green Space Strategy which provides a useful basis for local standards for natural green space, formal green space and allotments. Furthermore, the Council is also working on a Green Infrastructure Strategy, as part of this work the role of the urban extensions in terms of strategic green infrastructure for the district will be explored.

6.7 Furthermore, the West of England Infrastructure study will identify issues in relation to various other infrastructure categories, specifically:

- Gas
- Electricity
- Water
- Sewage
- Telecommunications
- Flood Prevention
- Acute Healthcare

6.8 Work undertaken by B&NES to inform this study, suggests that there are no major obstacles in relation to the above infrastructure categories. However, funding to provide the necessary infrastructure will need to be secured.

6.9 For example, in relation to gas and electricity, local connectivity costs are considered to be low and of the level that would be absorbed by normal development costs at both options SWB1 and SWB2. Similarly, for water supply new leading mains would be required, although these costs are considered to be normal for both locations. In relation to sewerage, there is limited existing capacity at either location. Downstream infrastructure is likely to be required and infrastructure providers have told us that this is likely to be more costly for the option SWB 2.

***Availability of Land***

6.10 Bath & North East Somerset Council is undertaking a Strategic Housing Land Availability Assessment (SHLAA) as required by Planning Policy Statement 3: Housing (PPS3).

6.11 The assessment will form a key part of the evidence base for the Core Strategy and will need to demonstrate that adequate land is available to accommodate the level of development proposed in an urban extension to Bath.

6.12 Whilst this assessment will identify potential housing land, it will not make judgements about whether this should be included in the Core Strategy or whether it should form part of the 5-year housing land supply required by national government. The primary role of the SHLAA is to: (i) identify sites with potential for

housing, (ii) assess their housing potential; and (iii) assess when they are likely to be developed.

- 6.13 As part of this process land in the “area of search” for an urban extension to Bath has been submitted by landowners and development interests and will be assessed in terms of suitability and development potential. The draft SHLAA is due to be published in winter 2009, and will assess whether that the high level Core Strategy options for a new neighbourhood in an urban extension to Bath are realistic in delivery terms.

## 7 Areas for further work

- 7.1 The following are identified as broad areas requiring further work, it should be noted that this list is not exhaustive and will be subject to change. Comments are welcomed on these areas for further work.

### ***Stakeholder and Public engagement***

- 7.2 As part of the consultation on the Core Strategy options a number of public events and stakeholder events are planned. The outputs of these consultation events along with the written responses received as part of the public consultation will need to be compiled and analysed and will inform the next stages of the work.

- 7.3 A further stakeholder workshop considering the Core Strategy options for an urban extension to Bath is planned for December 2009. This workshop will be facilitated by the Commission for Architecture and the Built Environment and will allow stakeholders to discuss issues in relation to the urban extension options in depth. This workshop will help to shape the direction of the Core Strategy options in relation to the proposals for an urban extension to Bath.

### ***Taking on board the recommendations of the impact assessments***

- 7.4 As outlined in this information paper a number of appraisals of the Core Strategy options have been undertaken. The recommendations of these appraisals will need to be considered in more depth and additional work will be required to address any concerns raised. Further work on these impact assessments will also be undertaken as the Core Strategy progresses as necessary.

### ***Delivery***

- 7.5 As outlined in this information paper work to establish that the Core Strategy urban extension options are deliverable and identify the infrastructure requirements and delivery mechanisms is still ongoing.

### ***Evidence***

- 7.6 As outlined in this information paper, evidence is still under development in a number of areas. This work will need to be finalised.
- 7.7 In a number of areas additional evidence will need to be gathered, these areas where additional evidence are needed will be identified as the Core Strategy options are refined. Examples of areas where additional evidence is likely to be required include archaeological survey work, surface water management study, geological and geophysical survey work.

### ***Strategic Site Allocation in the Core Strategy***

- 7.8 It is proposed that any urban extensions included within the Core Strategy at the submission stage will be allocated as a strategic site. This will trigger a number of specific requirements:
- (a) The Strategic site boundary will need to be illustrated on the Proposals Map. To facilitate this justification and rationale for the proposed site boundary will need to be prepared. This will include a review of the strategic Green Belt role of the area and a justification for a change to the Bristol-Bath Green Belt. This will build on the initial assessment set out in **Appendix 2**.

- (b) A vision, high level concept and development principles for the strategic site will need to be outlined.
- (c) The quantum and mix of development anticipated within the strategic site will need to be defined. Evidence that these uses can be accommodated within the strategic site will need to be demonstrated.
- (d) A high level delivery and phasing strategy will need to be shown, including a plan for how the strategic site will be taken forward.

***Supplementary Planning Document***

- 7.9 It is proposed that any urban extensions will be comprehensively master planned, this will require the preparation of a Supplementary Planning Document.

## 8 References

*Please note: Studies underlined are available on the website, others are available on request. A number of studies are still ongoing and will be published on completion.*

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Bath & North East Somerset Council (2006) EiP Statements [B. B&NES supporting document list for 4.1 \(PDF - 26kb\)](#)

Bath & North East Somerset Council (2006) Bath & North East Somerset Business Plan (Ernst & Young 2006)

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Bath & North East Somerset Council (2006) EiP Supporting Study 8. [Urban Ext Env Cap Appraisal Report \(PDF - 2,832kb\)](#)



Bath & North East Somerset Council (2006) EiP Supporting Study 9. Strategic Sustainability Assessment of Potential Urban Extensions (within Draft RSS Areas of Search)

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Bath & North East Somerset Council (2006) [12. Background Paper on importance of Cotswolds AONB \(PDF - 65kb\)](#)

Bath & North East Somerset Council (2007) Core Strategy Issues Consultation Report

Bath & North East Somerset Council (2008) [Council response letter to RSS Proposed Changes \(PDF - 28kb\)](#)

Bath & North East Somerset Council (2008) [RSS Proposed Changes- Council Response \(PDF - 253kb\)](#) and [Council response to RSS Proposed Changes- Executive Summary \(PDF - 31kb\)](#)

Bath & North East Somerset Council (2008) [Ernst and Young Commentary on RSS Proposed Changes \(PDF - 134kb\)](#)

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Bath & North East Somerset Council (2009) Outline for Archaeological Assessment and Evaluation

Bath & North East Somerset Council (October 2009) [Habitat Regulations Assessment for Core Strategy Options](#)

Bath & North East Somerset Council (October 2009) [Equalities Impact Assessment for Core Strategy Options](#)

Bath & North East Somerset Council (October 2009) [Sustainability Appraisal for Core Strategy Options](#)

Bath & North East Somerset Council (2009) [Business Land and Employment Study](#)

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Bath & North East Somerset Council (draft Oct 2009) South Stoke Conservation Area Appraisal

Bath & North East Somerset Council (ongoing) Newton St Loe Conservation Area Appraisal

Bath & North East Somerset Council (October 2009) [World Heritage Site setting Study: Information Paper](#)

Bath & North East Somerset Council (ongoing) Strategic Transport Modelling being undertaken by ATKINS

Bath & North East Somerset Council (ongoing) High Level Urban Design analysis to inform urban extensions to Bath

Bath & North East Somerset Council (ongoing) Draft Strategic Housing Land Availability Assessment

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Capita Symonds (2009) Flood Mitigation Strategy Scoping Report

Capita Symonds (2009) Strategic Flood Risk Assessment for B&NES (Level 1)

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CAMCO (June 2009) Bath & North East Somerset Council – Renewable Energy and Planning

Commission for Architecture and the Built Environment (July 08) Urban Extensions Workshop: Stakeholders Report

Cotswold AONB Board (2000) Cotswold Area of Outstanding Natural Beauty Management Plan – This can be read together with a number of the position statements prepared by the Board.

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Kestrel Wildlife Consultants (Mar 2009) An Appraisal of the “Bath Urban Surveys: Dusk Bat Surveys for horseshoe bars around south-western Bath. Assessments Summer 2008.”

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Roger Tym & Partners (ongoing) West of England Infrastructure Delivery Plan

Wessex Water (2009) Appraisal of options in terms of sewage treatment, waste water and water supply

West of England Partnership (2005) Joint Study Area Report

West of England Partnership (September 2005) First Detailed Proposals

West of England Partnership (2005) GBSTS Test 6/Scenario 5

### **National Policy**

Planning Policy Guidance 2: Green Belts

Planning Policy Statement 3: Housing

Planning Policy Statement 7: Sustainable Development in Rural Areas

Planning Policy Statement 12: Creating Strong Safe and Prosperous Communities through Local Spatial Planning

### **Further evidence**

*Evidence to support the Local Development Framework more widely has also been produced and this is available from the website [www.bathnes.gov.uk/ldf](http://www.bathnes.gov.uk/ldf)*

*In addition to this a number of submissions have been made to the Council specifically as part of the Core Strategy launch consultation and in relation to the Strategic Housing Land Availability Assessment.*

## **URBAN EXTENSIONS TO SOUTH/SOUTH WEST BATH ASSESSMENT OF BROAD LOCATION OPTIONS**

### **1.0 Introduction**

- 1.1 The Core Strategy will identify strategic sites (defined in outline, rather than detail) for urban extensions to Bath and will outline key development principles.
- 1.2 This work principally draws upon environmental capacity appraisals and strategic sustainability assessments originally undertaken to inform the Council's response to draft RSS. These assessments have been collated into 'location appraisals' for each location and are background documents to this report.
- 1.3 Potential locations for urban extension development have been assessed within the areas of search defined in the draft Regional Spatial Strategy (RSS). In relation to the Bath urban extension the EiP Panel's recommended broadened area of search (extended to encompass land to the west of Newbridge and land on the South Stoke plateau within the Cotswolds AONB) has been assessed.

### **2.0 Strategic Objectives for the urban extensions**

- 2.1 In order to assess the relative merits of potential locations a set of strategic locational objectives for the urban extension were drawn up. These objectives also largely reflect locationally specific sustainability criteria. Potential locations were then appraised against these objectives enabling the 'pros and cons' of each location to be identified. It should also be noted that the Core Strategy is the subject of sustainability appraisal (SA) at various points during its evolution; this will mean that the broad locations considered will be subject to formal SA, as will the refined strategic site options.
- 2.2 The locational objectives established to assess potential locations are set out below. Some of the objectives will influence the extent of urban extension development and therefore, indirectly its location.

#### Urban extension locational objectives

The urban extensions to Bristol and Bath should:

- 1. Be located where a mix of uses can be provided, including housing and a range of services and facilities reflecting the needs of existing and future residents
- 2. Be physically well integrated into the existing urban area
- 3. Be capable of having good access through a wide range of transport modes to the employment opportunities, services and facilities in the urban area

4. Be located where sufficient capacity is or can be made available in existing or new transport network (Highway and Public Transport)
5. Ensure that the identity of settlements close to the urban area is maintained or enhanced
6. Be located where impact on the purposes of the Bristol-Bath Green Belt is minimised
7. Minimise detrimental impact on ecological interest
8. Minimise detrimental impact on the landscape character and on views into and out of the area taking account of opportunities to mitigate the impacts
9. Minimise detrimental impact on the historic environment
10. Maximise opportunities to link into existing networks of green infrastructure (serving recreational and/or biodiversity functions)
11. Help facilitate regeneration of the neighbouring locality within the urban area e.g. by helping to support existing services and facilities in that locality and addressing deficiencies through the provision of new services and facilities
12. Be capable of timely delivery to ensure that the requirements for development during the Core Strategy period can be met
13. Potentially be capable of expansion in order to accommodate longer term development needs
14. Minimise detrimental impact on the World Heritage Site and its setting
15. Minimise detrimental impact on the natural beauty of the Cotswolds AONB taking account of opportunities to mitigate the impacts

2.3 The first objective 'to be located where a mix of uses can be provided' has two locational elements. Firstly, it relates to the existing mix of uses available in the locality or part of the urban area close to where the urban extension will be located and secondly, the extent of opportunities to provide a mix of uses is likely to vary according to the size of the urban extension. Crudely, significant development in one location is likely to facilitate provision of a greater mix of uses than smaller developments in numerous locations. It should also be noted that the mix of uses, including scale and type of employment uses, to be provided in the urban extensions is dependent on its function. This will vary according to the spatial strategy options for the urban areas as whole.

### **3.0 Assessment of locations**

3.1 Following an initial sieving exercise three broad locations within the area of search are assessed. These were West of Twerton; Haycombe; and Odd Down/South Stoke plateau. The main area outside these locations is land between Odd Down and Englishcombe which is not considered suitable for development principally due to significant and multiple environmental constraints. The area is characterised by a complex and steeply undulating landform. The landscape/visual impacts of development would be very significant and would result in harm to the setting and containment of the city. In addition there are significant areas of ecological interest i.e. sites of nature conservation importance and priority habitats that would severely limit any development capacity. (See Landscape and World Heritage Study of South/South West Bath).

- 3.2 Results of the assessment of the three locations against each of the locational objectives are set out below.

### **Option 1 – West of Twerton**

1. *Mix of uses*: urban extension in this location would be large enough to provide a good mix of uses within the development itself. However, this location is not well integrated, visually or physically, into the adjoining parts of Bath and in addition these parts of the city do not have as good a range of facilities as the Odd Down area (see option 3). This location may result in greater travel distances in order to access services/facilities. Employment uses could form part of the mix of uses and this location is likely to be the most attractive to the market of all those in the area of search given its proximity to the strategic transport corridor and links to Bristol, this view is supported by the Council's *Business Growth and Employment Land* study.

2. *Physical integration*: not physically adjoining or integrated into existing built up area, but can achieve connections through using Newton Brook valley as part of Green Infrastructure network. Therefore, whilst walking/cycling distances to urban area's services/facilities are longer, routes can be made attractive.

3. *Good access via sustainable transport*: this location performs well. It lies on A4 bus corridor and is well linked to Newbridge Park & Ride and future rapid transit link into and across Bath. Longer term rapid transit links to Bristol. In addition it is close and well linked to Bath Spa University at Newton Park. In summary, this location is well linked to local (Bath) and wider (Bristol) public transport network. Cycle links achieved via close proximity and therefore, potential to link into National Cycle Route 4.

4. *Transport network capacity*: public transport links see above. Of all the options within the 'area of search' the West of Twerton location has the best road links to Bristol, north fringe of Bristol and the motorway network. However, it lies within the congested Bristol-Bath A4 corridor and further study is needed to assess the impact of development on the A4 corridor (in conjunction with the impact of development elsewhere in this corridor, including South East Bristol urban extension) and what highway improvements would be needed. In local highway capacity terms development may require improvements to Globe junction and A4/A36 fork (this requires further study).

5. *Identity of surrounding settlements*: development would reduce the physical gap between Bath and Newton St Loe (although coalescence unlikely) and is likely to impact on the setting of the village.

6. *Bristol-Bath Green Belt purposes*: development in this location would have a significant impact on fundamental purpose of Green Belt as it lies within the

strategic gap between Bristol and Bath (and the intervening settlements of Corston, Saltford etc). See Appendix 2 for further details.

*7. Ecology:* potential impact on geological SSSI to north of the site and Newton Brook SNCI and Carrs Wood Nature Reserve. These nature conservation interests would need to be protected in planning the urban extension. Location lies within 4.4 km of bats SAC (most distant of all location options) – impact likely to be less significant. See the Habitat Regulations Assessment for further details.

*8. Landscape/visual:* visually prominent and incongruous location. Development would have a high landscape impact and would appear as a physically separate area giving the impression of urban sprawl (out of character with contained/compact city).

*9. Historic Environment:* development could harm the setting of Newton Park (Historic Park & Garden), Newton St Loe Conservation Area and 3 Grade II listed buildings on the boundary of the area. Development could potentially damage archaeological remains from Iron Age and Roman occupation in this area (further investigation underway).

*10. Green Infrastructure Opportunities:* Newton Brook valley and woods is an existing strategic green infrastructure asset and opportunities to use this as a positive aspect of development should be maximised. In addition development could be well linked to Carrs Wood to the east of the appraised location (would require careful management).

*11. Regeneration:* despite physical separation development would provide opportunities to address deficiencies of facilities/services in Twerton (relatively deprived area in the city).

*12. Delivery:* land at this location is in a single ownership (Duchy of Cornwall). Therefore, if development is promoted through the Core Strategy delivery should be relatively straightforward i.e. land assembly not needed.

*13. Longer term expansion potential:* Opportunities exist to safeguard land for longer term development. However, it must be noted that such development would have significant landscape and visual impacts and development further west would have an increasing impact on strategic gap between Bath and Bristol and on Newton St Loe and Newton Park.

*14. World Heritage Site:* In summary, development at this site is likely to have an overall high negative impact with high significance to the setting of the World Heritage Site. See Appendix 3 for more detail.

*15. Cotswolds AONB:* development not in AONB but highly visible from it. When viewed from the north development would 'jump' Newton Brook valley resulting in

the urban area extending beyond the existing well-contained development boundary.

## **Option 2 – Haycombe**

*1. Mix of uses:* the location assessed was of a smaller scale than the other locations investigated, and if limited to this area development would probably not be able to support as great a mix of uses as the other locations. However, the development area could be extended but this would have very significant landscape and visual impacts (see objective 13 below). Some facilities exist in neighbouring localities but more limited than other options. Service/facility provision in the urban extension should be provided close to Whiteway in order to serve existing residents, as well as new. Limited opportunities to provide employment uses as part of the mix given the size of the site.

*2. Physical integration:* development in this location is capable of good physical integration.

*3. Good access via sustainable transport:* public transport (bus) links are good into Bath city centre. Direct access to the wider public transport network is poor. Development of 1,500 dwellings is not sufficient to support new public transport services/routes. In terms of cars development in this location is likely to result in some journeys through existing residential areas to the city centre.

*4. Transport network capacity:* vehicular access points on to Whiteway Road may be limited due to the steep gradients and highway safety concerns. Further study of traffic impacts and potential solutions is needed. Potential impact of development on wider road network, including A4 Bristol-Bath corridor should be the subject of further study. Development may give the opportunity to create additional capacity for existing bus services.

*5. Identity of surrounding settlements:* development in this location would not result in coalescence of any surrounding villages. However, it could impact on the setting of Englishcombe.

*6. Bristol-Bath Green Belt purposes:* location does not lie directly within the Bristol-Bath corridor therefore, the impact on the separation of the two cities is indirect.

*7. Ecology:* lies within 4km of the Bath-Bradford-on-Avon SAC and therefore, it may affect its integrity. Appropriate Assessment of the significance of impact on the bats and potential for mitigation would be needed. Haycombe Lane SSSI runs through this location and development would have a direct impact on it.

*8. Landscape/visual:* at this location the city is well contained by Whiteway Road which provides a strong boundary to the physical extent of the city. Development would therefore result in the urban area spilling over the lip of the bowl (within which most of the city is contained) into an attractive valley. Complex landform on



this edge of Bath means that development would be highly visible and lead to the loss of an attractive, rural landscape.

*9. Historic Environment:* development could harm the setting of Englishcombe Conservation Area and the listed building and Scheduled Ancient Monuments (SAM) in the Englishcombe area (to the south of development location). Potential impact on buried archaeological remains of medieval occupation.

*10. Green Infrastructure Opportunities:* Haycombe cemetery adjoins this location which provides recreation (walking) opportunities. There is also a concentration of footpaths in the area which could be linked into future development.

*11. Regeneration:* opportunity to provide facilities and services which could address deficiencies in the directly adjoining Whiteway area which is a relatively deprived part of the city (residents currently have to travel to Twerton local centre).

*12. Delivery:* the location comprises land owned by the Duchy of Cornwall and the Council. Therefore, if development is promoted through the Core Strategy delivery should be relatively straightforward i.e. land assembly not needed.

*13. Longer term expansion potential:* development location appraised is about 46 ha in area. A mixed use urban extension is estimated to have an approximate land take of 60 ha. Therefore, in order to accommodate the full extent of urban extension development required in the draft RSS and the requisite mix of uses and open spaces, development would need to extend outside the location assessed.

Expansion southwards would impact more severely on the landscape setting of Englishcombe, as well as the nearby listed building and Scheduled Ancient Monument. Expansion westwards would result in development straddling Newton Brook and encroaching up the western side of the valley. As such expansion to meet even the immediate requirements (up to 2026) would have significant landscape and visual impacts. Longer term expansion would be likely to lead to even greater impacts including the possible merging of Bath and Englishcombe. (See also Pennyquick Expansion Area identified in 1960's – the Haycombe location appraised represents the north east corner of the larger Pennyquick area. Expansion of Haycombe option south westwards along Newton Brook valley could represent a longer term option utilising the valley as a Green Infrastructure feature. Further assessment would be needed).

*14. World Heritage Site:* See accompanying information paper on the *World Heritage site setting* for further information about Haycombe.

*15. Cotswolds AONB:* development would be highly visible from the AONB to the north (similar impact to West of Twerton above).

### **Option 3 – Odd Down/South Stoke plateau**

1. *Mix of uses*: good accessibility to a range of services and facilities including secondary schools (relatively close to Ralph Allen which is one of only two state sector co-educational secondary schools in the city). Urban extension of 1,500 dwellings could also provide additional facilities e.g. primary schools etc. Employment uses could theoretically form part of the mix of uses but attractiveness to the market and therefore, take-up would be to serve more local needs, this is supported by the *Business Growth and Employment Land study*.

2. *Physical integration*: western part of this location is not well integrated in to the urban fabric of the city. Development would be separate from the urban area and have the appearance of urban sprawl. However, there are already some urban fringe type uses on the edges of the area around the A367 e.g. Park & Ride site and Fuller's Earthworks which influence the character of this locality and could be incorporated into the urban extension or redeveloped. Development in the eastern area could be better integrated into the physical form of the urban area and in particular existing development at Odd Down, including the recently constructed Sulis Meadows housing estate. In order to achieve good integration development would require high standards of design and careful management of the Wansdyke SAM. Potential severance and separation of two elements of new urban extension either side of the A367.

3. *Good access via sustainable transport*: good public transport (bus) links into Bath city centre and also south and south eastwards to Radstock and Frome. The Odd Down Park & Ride site which is due to be extended (as part of the Bath package) lies on the edge of the development area and could as part of the urban extension be moved further out towards new edge of the city (this would help to ensure new residents of urban extension use bus services into city centre rather than using Park & Ride which could potentially include some car use in journeys). Proposal to provide bus lanes from this area into the city centre via Greater Bristol Bus Network Improvements. Eastern (South Stoke) end is also able to link into existing bus routes to the city centre, including Route 13 which is a Quality Bus Route. No national cycle routes that can be directly linked into ('Two Tunnels' cycle project passing through south Bath and linking into NCR 24 lies fairly close to the east but is not of direct benefit to development in this location).

4. *Transport network capacity*: further studies of traffic impacts would be needed but it is likely that sufficient local network capacity exists and development provides potential to enhance bus services to help address traffic impacts. However, (subject to traffic impact studies) it is highly likely that development would add to existing congestion on A367 (Wellsway) and Whiteway Road and worsen existing problems at key junctions. Potential impact of development on wider road network, including A4 Bristol-Bath corridor, should be the subject of further study.

*5. Identity of surrounding settlements:* development in the western part of this location would not have any significant impact on surrounding settlements. However, development in the eastern part would threaten the separate identity of South Stoke. Through design and treatment of edge of urban extension (e.g. in terms of uses, building heights, forms etc) could seek to minimise harmful impact. Through locating urban extension here there is an indirect benefit to the identity of settlements surrounding other parts of Bath e.g. Englishcombe, Newton St Loe.

*6. Bristol-Bath Green Belt purposes:* this location lies outside the strategic gap between Bristol and Bath and therefore, development would not have an impact on the fundamental purpose of the Green Belt.

*7. Ecology:* much of this location lies within the Strategic Nature Area (identified in draft RSS). Development either within the SNA or on land abutting it would cause significant habitat fragmentation in an area of high ecological importance. It lies within 1-2km of the Bath-Bradford-on-Avon SAC and within the main feeding areas of the Horseshoe bats. No record of bats utilising eastern part of location for feeding but this may be due to its current lack of use for grazing. Appropriate Assessment of the effect on its integrity is needed (likely to be more significant impact on bats/integrity of SAC than other options). Two ancient woodlands lie just to the north of the western part of this location and the impact on them will need to be assessed. Several species rich hedgerows present in this location that would need to be surveyed. Avon BAP priority species also present.

*8. Landscape/visual:* development would result in the loss of open plateau countryside west of the A367 and immediately to the east of A367 and Park & Ride site would be highly visible from a wide rural area given the skyline position. Development would also appear as separate from the main urban area to the west of the A367. However, mitigation/softening of impact may be possible through extensive tree planting.

Further to the east (east of Sulis Manor) development would be less visible as it is partly away from the ridge and partly well screened by woodland (additional planting would reduce the impact further). Development on land east of Sulis Manor would also have a low impact on rural character as it is already surrounded on three sides by housing.

*9. Historic Environment:* location straddles the Fosseway and therefore, it is likely that development would impact on archaeological remains from Roman (and Bronze Age) occupation. Development in this location will have an impact on the setting of the Wansdyke (SAM). Significant concerns regarding direct impact on the Wansdyke itself through development of the eastern area – effective mitigation of harmful impact of increased human pressure unlikely to be possible (see impact of Sulis Meadows housing estate). Further development south of Wansdyke also weakens its role as barrier to urban sprawl.

*10. Green Infrastructure Opportunities:* development could link into the numerous footpaths in the area. The nearby Middle and Vernham woods (to the north west) and Horsecombe Vale (to the east) provide further Green Infrastructure opportunities.

*11. Regeneration:* urban extension in the western part of this location (especially to west of A367) would be relatively isolated (not closely integrated to this part of Bath). In addition whilst there are some small pockets of deprivation, the neighbouring locality is not generally deprived (in comparison to Twerton/Whiteway) and appears to be well served by a cluster of existing community facilities and services e.g. schools, meeting venues etc.

*12. Delivery:* much of the land to the east of the A367 is owned by the Hignett Family Settlement and therefore, delivery of this part of the location should be relatively straight forward. Land in the remainder of the location is in multiple ownership, which could make land assembly and delivery more difficult. It is also known that much of this location (particularly the western area) is undermined by Fuller's Earthworks mining (information on extent). Further geotechnical surveys are needed to determine impact on the area's developability.

*13. Longer term expansion potential:* Expansion further south in this location is limited as land falls within the Cotswolds AONB and the location is bounded by existing development to the east and south east (including South Stoke village). Additional development to the south and west would extend beyond the plateau on to relatively steep slopes.

*14. World Heritage Site:* In summary, development of this site with careful design would potentially have a moderate negative impact with moderate significance to the landscape and visual setting of the WHS. This is likely to rise to a high negative impact with high significance for some parts of the area. See Appendix 3 for further information.

*15. Cotswolds AONB:* skyline development on western parts would have a significant impact on views from the Cotswolds AONB to the south and east. Development in the eastern part of this location would be within the AONB and therefore, have direct impact upon it (further assessment of nature of impact is needed). In order to allocate this area for development would need to meet the exceptional circumstances outlined in PPS7.

### Summary

- 3.3 Set out below is a brief summary of the pros and cons of each location against the locational objectives:

#### West of Twerton

##### **Pros**

- Good access to local and strategic public transport network linking to Bath city centre and Bristol
- Potential benefits for Twerton area through provision of new facilities
- Land in this location is almost entirely in single ownership thereby facilitating delivery
- Potential for longer term expansion but with significant landscape and visual impacts

#### **Cons**

- Poor physical and visual integration in to Bath urban area
- Visually incongruous and prominent location – much of the location is highly visible from Cotswolds AONB
- Limited existing facilities in nearest parts of city
- Significant impact on strategic Green Belt gap between Bath-Bristol and gap between Newton St Loe and the city

#### Haycombe

##### **Pros**

- Potential regeneration benefits for neighbouring locality
- Good public transport access to city centre
- Land in this location is in single ownership thereby facilitating delivery
- Potential for longer term expansion but with significant landscape and visual impacts

##### **Cons**

- Significant landscape/visual impacts – city would extend out of bowl in area where currently well contained by Whiteway Road
- Poor wider public transport links
- Highway safety issues affecting vehicular access and connectivity (*note – discuss with RS*)
- Small development area – less capable of accommodating employment uses
- Limited existing facilities/mix of uses in neighbouring area
- Lies within 4km of bats SAC so greater likelihood of significant effect

#### Odd Down/South Stoke Plateau

##### **Pros**

- Good public transport access to city centre and settlements to the south and south east
- Accessible to good range of nearby services and facilities
- Eastern area is capable of reasonable physical integration into the city and is well screened so limited landscape/visual impact
- Significant area of land in this location is in single ownership thereby facilitating delivery
- Some potential for expansion in western part of this location but with significant visual and landscape impacts

##### **Cons**

- Location straddles Cotswolds AONB boundary so development would have direct and indirect impact on the AONB
- Location lies very close to bats SAC so likely to have significant effect
- Western part of location is physically separate from urban area and highly visible
- Likely significant impact on Wansdyke (SAM)
- Development in eastern area would threaten separate identity of South Stoke
- No potential for longer term expansion in eastern part of this location due to topography and nearby South Stoke village

### Conclusion

- 3.4 From the analysis undertaken it is concluded that the Haycombe location should not be pursued as its disadvantages significantly outweigh its advantages. It is considered that work refining broad locations to strategic site options should be undertaken in relation to West of Twerton and Odd Down/South Stoke plateau.
- 3.5 With reference to the Landscape and World Heritage Study and environmental capacity appraisals undertaken it is considered that smaller scale development would still cause environmental harm. Therefore, options revolving around splitting urban extension development into a multitude of smaller sites within the area of search are not considered worth pursuing. In addition the possibility of a series of very small scale developments (say 50-100 dwellings) all around the fringes of Bath is not tested at this time as it is contrary to the draft RSS and the EiP Panel recommendations, and it would be difficult to justify each development site within the AONB against the PPS7 tests.

## Initial Green Belt Assessment of options for a new neighbourhood in an urban extension to Bath (October 2009)

- 1.1 The Bristol-Bath Green Belt was designated in 1966 in the Gloucestershire and Somerset County Development Plans. It has been retained in the Development Plan since this time. The detailed Green Belt boundary for Bath is set out in the Bath North East Somerset Local Plan Proposals Map.
- 1.2 This assessment has been written with reference to the national planning policy on Green Belts *Planning Policy Guidance 2: Green Belts*, hereafter referred to as PPG2.

### **Rationale for strategic alterations to the Green Belt**

- 1.3 National planning policy states that Green Belt boundaries should be altered only in exceptional circumstances (PPG2 para. 2.6). In relation to the proposals for an urban extension to Bath the draft Regional Spatial Strategy (RSS) provides the basis for these strategic green belt amendments. It states within policy SR2 that local authorities must “within a revised Green Belt make provision for significant urban extensions”. “Areas of Search” for urban extensions are also indicated which includes south/southwest Bath.
- 1.4 Furthermore the draft RSS states that:  
*“Green belt is a key feature in planning for the West of England, preventing the coalescence of settlements (principally Bristol, Bath and Weston-super-Mare) as well as ‘urban sprawl’. It is important that the primary role of the green belt in preventing the joining up and loss of character of settlements is reinforced. Recognising that the capacity of the existing urban areas to accommodate development is lower than the overall requirement, well-planned urban extensions will be needed to meet this shortfall, incorporating the conclusions of the Strategic Green Belt Review .” (para 4.2.5)*
- 1.5 Opportunities for development within urban areas contained by the Green Belt and areas beyond the Green Belt were considered at the Examination in Public on the Regional Spatial Strategy. Bath & North East Somerset Council has continued to examine the capacity for development within its urban areas and elsewhere in the district through its Strategic Housing Land Availability Assessment.
- 1.6 Policy SR3 in the draft Regional Spatial Strategy for the South West states that “the general extent of the Bristol and Bath green belt is maintained subject to changes in boundaries that will be defined in Local Development documents”, the Green Belt boundary will need to be revised at Bath to “accommodate the urban extensions required for longer-term development of Bristol and Bath at locations identified”, it is

also stated that the “revised inner boundary” of the Green Belt should be coterminous with the edge of the urban extensions”.

### Comparing the Green Belt role of the options

1.7 There are five purposes of including land within Green Belts as outlined in national planning policy. Table 1 below summarises the relative performance of land in the Core Strategy options for an urban extension to Bath against these criteria:

Table 1

<b>Purpose of including land within Green Belts (PPG2 para 1.5)</b>	<b>West of Twerton (Option SWB 1)</b>	<b>Odd Down/South Stoke Plateau (Option SWB 2)</b>
To check the unrestricted sprawl of built up areas	In both locations urban extension would constitute development beyond the existing urban edge. Any urban extension development would be contained by a redefined Green Belt boundary (see section 3 below).	
To prevent neighbouring towns from merging into one another	The primary purpose of the Bristol-Bath Green Belt is to maintain the gap between these two cities. As this option is located on the A4 corridor between the two cities, land in this area play this strategic Green Belt role. Developing in this location would reduce this Green Belt gap in an area that has an important role in maintaining the Green Belt gap between Bath and SE Bristol.	



	<p>Development at this location would also close the gap between the existing urban edge and the villages of Newton St Loe, Corston and Saltford. Although, the primary purpose of the Green Belt is to maintain the separation between Bristol and Bath, the physical separation between the city and these villages plays a significant role in maintaining the separation between the cities.</p>	<p>This location plays a less strategic role in terms of separating Bristol and Bath Green Belt, as it is located further south away from the main transport corridor between Bristol and Bath.</p> <p>Development at this location would close the gap between the existing urban edge and the villages of South Stoke and Combe Hay. Although the primary purpose of the Green Belt is to maintain the separation between Bristol and Bath, the physical separation between the city and these villages is also an important role.</p>
<p>To assist in safeguarding the countryside from encroachment</p>	<p>Development at either location will mean that the urban area will be extended onto areas which are currently open countryside, which has little existing development.</p>	
<p>To preserve the setting and special character of historic towns</p>	<p>Development at either location will impact on the setting and special character of Bath. Development at either location will also impact on the setting and special character of the villages on the edge of Bath, many of which are also conservation areas in their own right.</p> <p>The initial assessment of the two options using the World Heritage site setting study methodology is available as Appendix 3 to the information paper that this assessment appends</p>	

	<p>For this option, as outlined in the Core Strategy options document this suggests that “Development would have a major impact on the landscape and the setting of the World Heritage Site as the location is highly visually prominent. Development would breach the containment of the existing urban area that is provided by Carr’s Woodland and Newton Brook valley.” (p109)</p>	<p>For this option, as outlined in the Core Strategy options document:  “Development at this location could result in only a moderate impact on the landscape setting of the city in the South Stoke plateau area where measures to reduce the visual impact could be used. However, development would have a potentially higher impact close to Combe Hay Lane, in the part of this area described at Odd Down, which is next to the A367.”</p>
<p>To assist in urban regeneration, by encouraging the recycling of derelict and other urban land</p>	<p>The Council acknowledges that, as outlined in the draft RSS, not all of the District’s long term development needs can be met through brownfield regeneration. This means that there may be a need to develop greenfield urban extensions in the later part of the plan period. However, since the draft RSS was published, there has been a significant change in economic circumstances. The Council follows the ‘plan, monitor and manage’ approach and will continue to make changes to the policy framework at appropriate times. This may lead to a review of the need for greenfield urban expansion.</p>	

**Defining Green Belt Boundaries**

- 1.8 National Planning policy states that when defining detailed Green Belt boundaries: *“it is necessary to establish boundaries that will endure. They should be carefully drawn so as not to include land which it is unnecessary to keep permanently open. Otherwise there is a risk that encroachment on the Green Belt may be allowed in order to accommodate future development. If boundaries are drawn excessively tightly around existing built-up areas it may not be possible to maintain the degree of permanence that Green Belts should have. This would devalue the concept of Green Belt and reduce the value of local plans in making proper provision for necessary development in future.” (PPG2 para 2.8)*
- 1.9 To allocate an urban extension to Bath as a strategic site in the Core Strategy the Green Belt boundary will need to be defined so that future development requirements can be accommodated. By looking at the maximum range for an urban extension to Bath (i.e.

“up to 2,000 dwellings”) the Council is considering the potential of options to accommodate this highest level of development.

1.10 National Planning Policy also states that Green Belt boundaries should be “clearly defined, using readily recognisable features such as roads, streams, belts of trees or woodland edges where possible.” These issues will need to be considered in more detail should a strategic site for an urban extension to Bath be allocated in the Core Strategy. However, this has already been considered in the presentation of options West of Twerton (SWB1) and Odd Down/South Stoke (SWB2) as identified in the Core Strategy options consultation paper (October 2009). Although site boundaries are not suggested, indicative areas are illustrated on aerial photograph base maps, the boundaries of which follow readily recognisable features:

- The West of Twerton preferred option is a triangle of land, bounded by the A4 to the north and Pennyquick Road the south. The eastern side adjoins the existing urban edge at the Newton Brook valley. (see figure 27 page 110)
- The Odd Down/South Stoke option is more irregularly shaped, although it follows the shape of the plateau land in this location. It is bounded by strong field boundaries to the west, to the north the site is defined by the edge of the plateau which at this point slopes steeply downhill together with a linear tree belt, to the south the area is bounded by the existing urban edge and the Wansdyke and to the east the area is bounded by Southstoke Lane. (see figure 30 on page 114)

### **The use of land in Green Belts**

1.11 It is the “purposes of including land in Green Belts” that is of “paramount importance” to their continued protection (PPG2 para 1.7). However, national planning policy states that land within Green Belts “has a positive role to play in fulfilling a number of objectives” for example:

- provides opportunities for access to the open countryside for the urban population;
- provides opportunities for outdoor sport and outdoor recreation near urban areas;
- retains attractive landscapes, and enhance landscapes, near to where people live;
- improves damaged and derelict land around towns;
- secures nature conservation interest; and
- retains land in agricultural, forestry and related uses.

(PPG2 para 1.6)

1.12 In the locations being considered for an urban extension to Bath the land currently fulfils a number of these roles. However, as outlined in national planning policy (PPG2 para 1.7) “the extent to which the use of land fulfils these objectives is however not itself a material factor in the inclusion of land within a Green Belt, or in its continued

protection. For example, although Green Belts often contain areas of attractive landscape, the quality of the landscape is not relevant in the inclusion of land within a Green Belt or its continued protection.”

## Draft Summary Assessment of Impact of Proposed Bath Urban Extension Sites on the World Heritage Site Setting

Note: This assessment should be read in association with the Bath World Heritage Site Setting Study: Information Paper October 2009 and the glossary at the end of this assessment.

- 1.1 The two potential sites for an urban extension to Bath are being considered in the *Core Strategy Options Document (October 2009)*, the west of Twerton and South Stoke Plateau/Odd Down. Both are within the setting of the World Heritage Site. Any extension within these areas would inevitably have a detrimental impact on the Bath World Heritage Site Setting. The overall significance of the impact on the setting however will vary according to the sensitivity of the individual assets affected (whether the landscape, views or historic buildings or remains) and the magnitude of impact of the proposals on those assets. The assessment below is based on broad assumptions about the nature of the proposed development and should therefore be seen as an interim guide to the expected impact until a more detailed assessment can be carried out once a specific proposal or Masterplan is prepared for each site.

### West of Twerton (option SWB 1)

#### Existing site and immediate area

- 1.2 The site is a prominent rounded local hill where the edge of the plateau meets the Avon valley. It is characterised by a steep slope to the north which meets the gently sloping valley floor approximately along the line of the A4 Bristol Road. The open agricultural valley floor and steep valley sides leading to the adjoining plateau of which the site forms a part, has significance in that it is much the same as it was when it was valued in Georgian times. A popular walk and viewpoint for appreciating this view was from a vineyard in Old Newbridge Hill on the Upper Bristol Road (illustrated by Bonner in 1791). John Wood specifically referred to the landscape of this area and Jane Austen is known to have walked the popular path along the river which would have taken in this view.
- 1.3 The agricultural landscape of the Avon valley would have been part of the experience of visitors to Bath as they saw the set pieces of Bath appearing in the distance while travelling on the Lower Wells Road (the current A39), the Lower Bristol Road (the current A4) and Upper Bristol Road (the current A431) which were all improved by the Turnpike Trusts.
- 1.4 The site forms an important green hillside setting to many sensitive views (in this context views identified to be of importance to the World Heritage Site and the Outstanding Universal Value) within and to the World Heritage Site. A selection of the most sensitive views include from Kelston Hill, Prospect Stile, Little Solsbury Hill and North Road (which show the Georgian city within its historic landscape setting), Sham Castle, Alexandra Park (a key viewpoint appreciated in Georgian times and the present day), Lansdown Cemetery and Beckford's Tower (a key Georgian building and landmark), The A4 Bristol and Newbridge Roads, the Old Newbridge Hill, the A431 Kelston Road and the walk beside the River Avon.
- 1.5 There are known to be a Roman villa set within Iron Age field systems and Roman cemetery within the area of search which are sensitive in relation to understanding the Roman context to the founding of Bath as a spa town.

#### Potential Impact of Proposals

##### Landscape Setting

- 1.6 The site forms a prominent and integral part of the open rural character of this part of the Avon valley. Development of this site would be widely visible. Because of its separation from Bath by the Newton Brook valley well beyond the compact development of Bath contained by the higher ground of Twerton, including the recreation ground and Twerton Park, would appear as a separate development between

Bath and Newton St Loe with a resultant high impact on the landscape at this important approach to Bath from the west. This would conflict with one of the characteristics of Bath recognised in the Statement of Outstanding Universal Value of ‘--- a complete city, situated in a hollow in the hills ---’

- 1.7 The landscape of which this area of search is a part is therefore of high sensitivity in relation to the World Heritage Site Setting. An urban extension at this location is likely to have a high negative impact on the landscape setting and the significance of the impact on the World Heritage Site landscape setting at this position would be high.

#### Visual Setting

- 1.8 Views to the hill on which the urban extension is proposed forms the green (agricultural land and woodland) backdrop to a number of highly significant views within Bath and views from outside the city looking towards Bath. Development on the hill would therefore significantly diminish the quality of these views affecting characteristics which were present and valued in Georgian times through to the present day. This would compromise the principles of ‘-- integration of architecture, urban design and landscape setting, --’ referred to in the Statement of Outstanding Universal Value.
- 1.9 There are a high number of views (a selection is given above) which are of high sensitivity which would potentially be affected by the proposals at this location. The degree of impact on these views will vary between high negative to low negative depending principally on the distance of the viewing point from the site. The significance of the impact on the specific sensitive viewpoints is likely to be a combination high and moderate again largely dictated by the distance of the specific viewpoint from the site.

#### Historic Context

- 1.10 Development of this site may impact on buried archaeological remains including known evidence of Roman activity in the area and on Iron Age field systems. It may therefore impact on the historic context of the World Heritage Site and its setting.

#### Summary

- 1.11 In summary development of this site is likely to have an overall high negative impact with high significance to the setting of the World Heritage Site affecting the landscape setting, important views and known / potential historic remains which are integral to the Outstanding Universal Value of the World Heritage Site and its setting.

#### Design Considerations

- 1.12 The site is at a very prominent location and this will need to be a strong influence in the design and layout of the urban extension at this location. While new tree planting is desirable for a range of benefits, including softening the edges of any development and helping it link to the open countryside, it would have limited benefit in screening because of the visually exposed nature of the site and the time needed for trees to grow to effectively screen any new development. There are opportunities to enhance existing Green Infrastructure both within the area and linking into Bath and the open countryside such as along the river corridor including the Bristol and Bath Railway Path. Seven Acre Wood should form a key part of the Green Infrastructure.

## Odd Down/South Stoke Plateau (option SWB 2)

### Existing site and immediate area

- 1.13 The site falls into two parts separated by Combe Hay Lane. It is a fairly flat plateau which slopes gently in all directions from a high point by the A367 to the west to the Sulis Manor radio mast to the east. Topographically it forms part of the wider area which includes the developed area of Odd Down.
- 1.14 There are no known sensitive views from within Bath to the site east of Combe Hay Lane. Views from the top of Beckford's Tower and Little Solsbury Hill show only a small part of the site seen as a slither of land with the site largely concealed by existing housing at Odd Down. The western part however is more widely visible including for example from longer views such as from Kelston Round Hill, Prospect Stile and Little Solsbury Hill.
- 1.15 There are a number of known historic assets within the area. The most significant is the Fosse Way which follows the current A367. This is of particular importance as a Roman Road and its part in the development of Bath as a spa town. There are also known Iron Age activities, Roman burials associated with Vernham Wood and the Wansdyke Scheduled Ancient Monument which may follow the course of a Roman Road. These are all sensitive in relation to the World Heritage Site setting.

### Potential Impact of Proposals

#### Landscape Setting

- 1.16 The whole of this area of search forms part of the Cotswold Plateau. The eastern part borders existing development to the north and the Sulis Meadows development and is more closely integrated with the rest of the plateau on which Odd Down is located. The western part by contrast is prominent and is largely undeveloped forming an integral part of the rural landscape surrounded by the Newton St Loe Plateau Zone. While both parts are on higher ground at the edge of Bath the eastern part could be developed to relate well to the existing developed area of Odd Down and avoid the appearance of Bath spilling out beyond the '*hollow in the hills*'. This would require development to be carefully designed to relate to the rural landscape, keeping it back from the edge of the plateau in conjunction with enhancing the existing tree cover on the southern edge. Development to the west of Combe Hay Lane would be more widely visible and would impact more on the surrounding open countryside. It would be harder to satisfactorily contain development from appearing to spill out and therefore impacting on the landscape setting of the World Heritage Site.
- 1.17 The landscape sensitivity of the two parts is therefore quite distinct. The western part is of high landscape sensitivity and the eastern part is of moderate landscape sensitivity. The impact on the landscape setting of the World Heritage Site of an urban extension is likely to be high negative on the western part and low to moderate negative on the eastern part. The significance of the impact on the World Heritage Site landscape setting would be high for the western part and moderate for the eastern part.

#### Visual Setting

- 1.18 In general even though the site is visible from some significant viewpoints such as Prospect Stile, Beckford's Tower and Little Solsbury Hill it is generally seen in the distance from these views and would form only a small part of the view. It would therefore have little impact on the integration of (Georgian) architecture and the landscape setting. There are two key historic routes in the area of search. The Roman Fosse Way passes through the western part. The Midford Road passes the north eastern corner of the site.
- 1.19 The viewpoints mentioned are all of high sensitivity given their significance in appreciating Georgian Bath in its landscape setting and in reflecting the qualities of the historic routes in Georgian times of the

contrast passing from the rural green landscape over the edge of the hollow with views to Georgian Bath. The degree of impact on these views vary from low adverse in the case of the more distant views, moderate adverse in the case of Midford Road where development would close the rural agricultural gap and high adverse in the case of the Fosse Way where open views at the approach to Bath would be replaced by views to new development. The significance of the impact on the specific sensitive viewpoints is likely to be a combination of high and moderate dictated by the distance of the viewpoint.

#### Historic Context

- 1.20 Development of this site may impact on buried archaeological remains including known evidence of Roman and Iron Age activity in the area and would impact on the setting of the Fosse Way.

#### Summary

- 1.21 In summary development of this site with careful design would potentially have a moderate negative impact with moderate significance to the landscape and visual setting of the World Heritage Site. This is likely to rise to a high negative impact with high significance for some parts such as north of the A367. There is also likely to be a major impact on the historic context of the Fosse Way and Wansdyke.

#### Design Considerations

- 1.22 Particular care, including good design and appropriate mitigation, needs to be taken at the more exposed parts of the site. Development would need to be kept away from the more exposed parts and the edges of the plateau to prevent the appearance of the city spilling beyond the contained hollow of Bath into rural views and the open setting of Bath. New tree planting would have limited benefit in screening development at the edges of the plateau because of the visually exposed nature of the site and the time needed for trees to grow to form an effective screen. There are opportunities to develop this site with good links to existing developed parts of the city and to local facilities. There are also opportunities to enhance existing Green Infrastructure both within the area and linking into Bath and the open countryside such as the wooded slopes immediately south of the area.



## Glossary

- Sensitivity** The degree to which a particular asset (landscape, viewpoint, historic feature) can accommodate change arising from changes without detrimental effects on its character. In relation to the World Heritage Site setting the degree of sensitivity will primarily be dictated by the importance of the asset in supporting the Outstanding Universal Value and character of the World Heritage Site. An asset which is integral to the character and Outstanding Universal Value of the World Heritage Site is likely to be of high sensitivity while an asset which may only have peripheral importance in supporting the Outstanding Universal Value is likely to be of low sensitivity.
- Impact** Impact refers to the scale or degree of change to the asset and can be either positive, neutral or negative depending on how it affects the Outstanding Universal Value. The magnitude of impact will be influenced by factors such as proximity, in the case of views, and the ability to mitigate the impact effectively.
- Significance** The significance of the change is a judgement based on the sensitivity of the asset and the degree of impact of the proposals on the asset. It is then possible to make an overall judgement of significance based on the assessment of each individual asset.