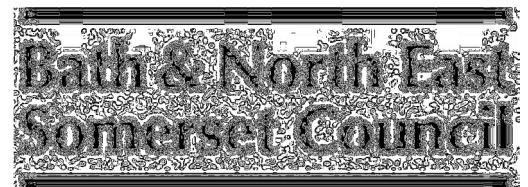


Bath and North East Somerset
Local Plan

Strategic Land Availability Assessment
Report of Findings (November, 2013)

Appendix 1b: Bath Green Belt



Bath Green Belt - Summary Schedule

Areas with some degree of suitability are highlighted. Given the context of Bath and likely impact of development suitability credentials of suitable sites are at best low to moderate.

	Ref	Name	Housing Potential	Suitability Credentials	Availability Confirmed
Cell A	A 1	Kelston Slopes	-	Nil	No
	A2	Weston Slopes (South)	-	Nil	No
	A2a	Weston Slopes (South, Broadmoor Lane)	-	Nil	No
	A3i	Weston Slopes (North Lower)	150	Low-Moderate	Partly
	A3ii	Weston Slopes (North Upper)	-	Nil	No
Cell B	B4	Lansdown Plateau*	-	Nil	No
	B5	Charlcombe Valley	-	Nil	No
	B6	Lam Brook Valley	-	Nil	No
Cell C	C7	Little Solsbury Hill	-	Nil	No
Cell D	D8	Bathampton (Upper Slopes)	-	Nil	No
	D9a	Minster Way	50	Nil	Yes
	D9b	Horseshoe Walk	5	Nil	Yes
	D10	River Avon Valley	-	Nil	Minor
	D11	Midford Valley	-	Nil	No
	D12	Perrymead	-	Nil	No
Cell E	E13	Cam Valley	-	Nil	No
	E14	Sulis Manor / Southstoke	300 #	Low-Moderate	Yes
	E14b	Midford Rd/ Packhorse Lane	100	Nil-Moderate	Yes
	E15	A367 / Fullers Earth	-	Nil	No
	E16	Old Fosse Road	30	Moderate	Yes
Cell F	F17	Haycombe	-	Nil	No
	F18	West of Twerton	1,500-2000	Nil	Yes

* B4 (Excludes School Playing Fields. See assessment for non GB sites)

Note: the land owner in respect of this site considers that there is sufficient suitable land here to yield 1,000 homes. The primary point of difference relates to the setting of the Wansdyke SAM and of the South Stoke Conservation Area.

Housing Potential

- The housing potential of this area has not been assessed on account of it not being suitable for development.

Land Availability

- There is no evidence that any land in this area is available for development.

Landscape and Visual Aspects

Existing Conditions

- 55ha
- This area comprises the steep south facing slope of the River Avon valley. The slope is indented. The Cotswold scarp slope is a distinctive and strong feature of this area with a promontory of higher ground which forms part of the distinctive undeveloped backdrop to the city. Small to medium sized pasture fields are bound by a mix of trimmed and untrimmed hedgerows. The hillside is well treed primarily with copses, bands of woodland and hedgerow trees. A few farms nestle on the hillside and occasional properties are sited close to the A431 west of Bath. The landscape is highly rural and whilst close to the city with some development being visible to the east, the area has very little connection with urban Bath. Due to the wide breadth of the valley, roads, rail, cycleway and public rights of way routed along the valley there are extensive views throughout and this hillside is highly prominent.

Landscape Impacts

- Development on this hillside would have a high impact on the open rural character of this landscape. It would interrupt the rural integrity of the Cotswolds hillside, a strong and prominent feature of the area. Development would involve the loss of trees and the strong pattern of hedgerows.

Visual Impacts

- Development would have a high impact on views across and from within the valley; from transport routes and the network of public rights of way, including the River Avon Trail and the Cotswold Way, routes of national importance. Development would be a prominent intrusive element of the view from the A4, the key route from the west, and the intercity rail route between Bristol and London. Development would appear incongruent; intruding into this attractive rural landscape surrounding the urban area for which the city is well known. It would appear as an isolated settlement because of its poor connectivity with the city. It would conflict with the predominantly well contained character of Bath's urban area. The views from the small number of properties in and looking towards this area

would also be highly impacted by development as it would change from a highly rural to an urban one.

Scope for mitigation

- Due to the high visual prominence of this area there is low potential for mitigation from views from the valley bottom and hillsides.

Historic Environment

Existing Conditions

- Kelston Park (G II*Historic Park and Garden) lies a short distance to the west.

Impacts

- Kelston Park has a wide and rural setting. Development in this area would not interfere with that setting particularly in view from the A4 .

Mitigation

- Measure to limit visibility of development within the setting Kelston Park would significantly reduce the developable area.

World Heritage Site and Setting

Existing Conditions

- The study area straddles the World Heritage Site boundary and extends into the immediate setting of the World Heritage Site. The key characteristics and values of the World Heritage Site and its setting at this point are:
 - Highly rural, steeply sloping landscape setting to the World Heritage Site, contributing to its green skyline.
 - Long distance views to the area from the west (particularly the key approaches to the World Heritage Site, the A4 and railway route), valley bottom and southern slopes of the World Heritage Site.
 - Very little connection to the city from within this area, with a rural feeling edge to this part of the World Heritage Site.
 - This area forms part of the distinctive geological landform in which the World Heritage Site lies.

Impacts

- Development in this area would have a high impact on the distinctively rural character of the setting of the WHS and would produce a poorly connected extension to the city, to the detriment of the rural edge of the World Heritage Site and the contained character of the city. Development would make the city newly visible to wide areas of the surrounding countryside, and would change the

character of the approach to the World Heritage Site. It would be very difficult to mitigate the impacts of development in this area due to the prominence of the area.

Nature Conservation

Existing Conditions

- The vast majority of the area is covered by a Strategic Nature Area (SNA) and it includes the Penn Hill West and East SNCI (BN80) to the rear of Oldfield School and Penn Hill Road. Shagboar Wood (fields on Dean Hill) SNCI adjoins the area to the north east
- The area contains several fields of species rich grassland (a BAP priority habitat) and a number of records of Biodiversity Action Plan (BAP) priority species. There are several substantial hedges in parts of this area which may be important and qualify as species rich hedgerows (a BAP priority habitat), but have not been surveyed.

Impacts

- Development within the SNA would cause significant habitat fragmentation in an area of high ecological importance and reduce the area of strategic capacity for habitat restoration and enhancement. It is likely that the SNA would suffer indirect impacts through development of land outside the SNA boundary from resultant increased urban fringe pressures. There would be further impacts on SNCIs and priority habitats.

Mitigation

- As areas identified as the best in the region to conserve, create and connect wildlife habitat at a landscape scale the loss of land from the SNA would be difficult to mitigate. Some degree of compensation could be achieved through off site habitat enhancement and long-term management at an appropriate location and scale, however the legal mechanisms are difficult and untested locally. Outside of the SNA it would remain difficult to mitigate for any development affecting SNCIs and the priority habitats. Buffer areas would be required to protect the SNCI sites as would protection and retention of key hedgerows.

Transport & Highways

- Not assessed given environmental constraints and absence of land availability

Green Belt

- See [Green Belt Review Stage 1 Report \(Arup, 2013\)](#) **CD9/E2**

Housing Potential

- The housing potential of this has not been assessed on account of it not being suitable for development. There is no evidence that any land in this area is available for development here.

Land Availability

- There is very little land availability in this area. The exception is two fields south of Broadmoor Lane / north of Lansdown Grange Farm. These fields is considered separately in more detail under area A2a

Landscape and Visual Aspects

Existing Conditions

- 48ha
- The indented steep north east facing slopes of this asymmetrical Weston Brook valley rise up sharply to the Cotswold Way, a national trail which follows the ridgeline of a green promontory of higher ground. This promontory forms part of the distinctive undeveloped backdrop to the city and contains the important local viewpoints of Dean Hill, Kelston Roundhill and Prospect Stile at the edge of this area overlook the entire valley. The area is rural with small and medium sized fields bounded by predominantly trimmed hedgerows with occasional trees. A small wood nestles on the lower valley sides and long thin wooded areas feature along much of the top of the slopes. A minor road runs along the valley bottom and turns into an unmade track serving a few isolated properties at the edge of the area. Development is contained on the opposite hillside and the valley bottom and whilst there is a visual connection to the urban area at Upper Weston, the undeveloped character forms an important rural setting to the city and the Cotswold Way. In contrast to the extensive slopes on the opposite side of the valley (Area 3), this side is more compact and intimate and the skyline is generally lower in height.

Landscape Impacts

- Development on this hillside would have a high impact on the highly rural character of this landscape and setting to the urban area. Development would involve the loss of trees and the strong pattern of hedgerows.

Visual Impacts

- Development would have a high impact on views from the Cotswold Way and other public rights of way in the area which are presently in the rural area. It would have a high impact on important views from the top of Weston Lane, of Upper Weston framed by rural fields and woodlands on the opposite side of the valley. Development would also have a high impact on views from the adjacent residential area because the rural views would be lost.

Mitigation

- Due to the high visual prominence of this area from Upper Weston, a busy route entering the city, from the Cotswold Way and many residential properties looking across to the area there is low potential for mitigation from views. The potential for mitigation would be low except for development in two small fields in the valley bottom which are quite well visually contained due to the topography, and additional planting would improve the potential for mitigation.

Historic Environment

- This area is unencumbered by heritage designations.

World Heritage Site and Setting

Existing Conditions

- The area abuts the World Heritage Site boundary and lies within the immediate setting of the World Heritage Site. The key characteristics and values of the World Heritage Site setting at this point are:
 - highly distinctive ridgeline with steep slopes that contributes to the rural setting and green skyline of the World Heritage Site
 - important views within this rural area, particularly from the Cotswolds Way
 - important wide views across the World Heritage Site
 - strong urban edge in valley bottom framed by rural countryside
 - this area forms part of the distinctive geological landform in which the World Heritage Site lies.

Impacts

- Development in this area would have a high impact on the distinctively rural character of the setting of the World Heritage Site. Due to the narrowness of the undeveloped slopes leading up to the ridge, there is little scope for development extending away from the existing urban edge without fundamentally altering the rural undeveloped character of this part of the World Heritage Site setting, and losing the green backdrop. Views from the Cotswolds Way and surrounding countryside would also be compromised.

Mitigation

- Due to the high prominence of this area, and the narrowness of the undeveloped slopes, particularly when viewed from Upper Weston and the Cotswolds Way, it would be very difficult to mitigate development in this area.

Nature Conservation

Existing Conditions

- The vast majority of the area is covered by a Strategic Nature Area (SNA) and it includes the Penn Hill East SNCI (BN80) at Penn Hill Road and part of the Weston Wood Complex SNCI (BN283)
- The area contains several fields of species rich grassland (a BAP priority habitat) and a number of records of Biodiversity Action Plan (BAP) priority species. There are several substantial hedges in parts of this area which may be important and qualify as species rich hedgerows (a BAP priority habitat), but have not been surveyed.

Impacts

- Development within the SNA would cause significant habitat fragmentation in an area of high ecological importance and reduce the area of strategic capacity for habitat restoration and enhancement. It is likely that the SNA would suffer indirect impacts through development of land outside the SNA boundary from resultant increased urban fringe pressures. There would be further impacts on SNCIs and priority habitats.

Mitigation

- As areas identified as the best in the region to conserve, create and connect wildlife habitat at a landscape scale the loss of land from the SNA would be difficult to mitigate. Some degree of compensation could be achieved through off site habitat enhancement and long-term management at an appropriate location and scale, however the legal mechanisms are difficult and untested locally. Outside of the SNA it would remain difficult to mitigate for any development affecting SNCIs and the priority habitats. Buffer areas would be required to protect the SNCI sites as would protection and retention of key hedgerows.

Transport & Highways

- Not assessed given environmental constraints and absence of land availability

Green Belt Purposes

- See [Green Belt Review Stage 1 Report \(Arup, 2013\)](#) **CD9/E2**

Additional Analysis re Broadmoor Lane (A2a)

- Prompted by the identification of land availability in the vicinity of Broadmoor Lane the Councils has assessed this specific area in more detail. The results of this more detailed assessment can be viewed here below. The Council finds that the land in question is not suitable

[World Heritage Site Setting and AONB Landscape and Visual Appraisal for Weston \(BANES, September 2013\)](#) **CD9/LV/2**

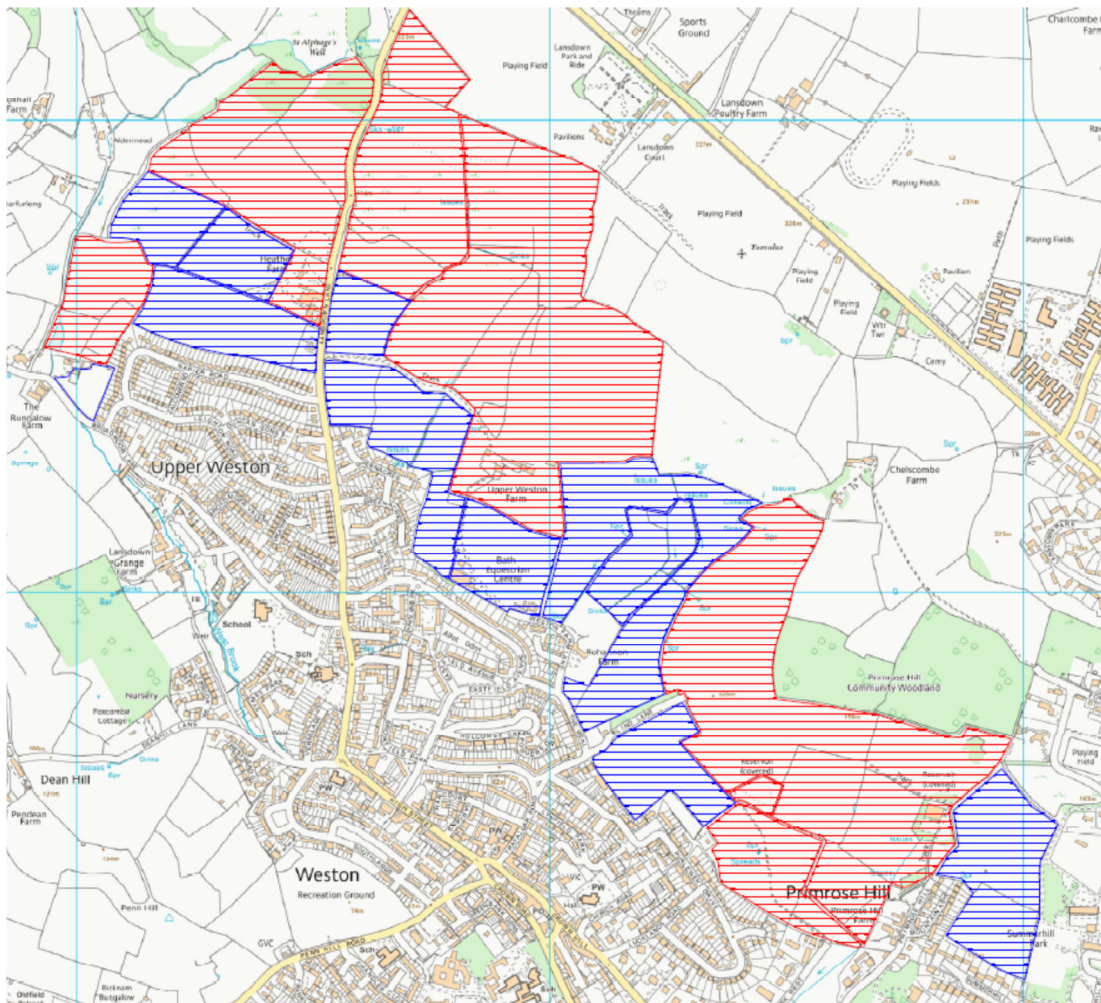
WESTON SLOPES (NORTH LOWER) A3i

Housing Potential

- The housing potential of the lower slopes (A 3i) is 150.

Land Availability

- The plan below illustrates land availability in respect of both the lower (A3i) and upper (A3ii) slopes to the north of Weston. The blue shading represents land that is available and the red shading areas that are not. Land availability is restricted to the lower slopes.



Analysis

- This area was first assessed during the preparation of the now abandoned RSS for the South West. An environmental capacity appraisal was published in 2007 and covered landscape and visual matters, the historic environment, including archaeology and world heritage site matters, and nature conservation.

CD4/UDL23 [BANES Urban Extension Environmental Capacity Appraisal: Land within the AONB surrounding Bath \(BANES, March 2007\)](#)

- The Proposed Changes to the Core Strategy (March 2013) were accompanied by the following studies in respect of the suitability of this area for development.

CD9/CO6 [Lower Slopes at Weston, Development Concept Options Report \(Arup, April 2013\)](#)

CD9/CO7/1 [Lower Slopes of Weston, Landscape and Visual Impact Study \(Arup, April 2013\)](#)

CD9/E1 [Bath Walkover Survey & Assessment Report – Land at Ensleigh and Weston \(Bat Pro Ltd, Feb 2013\)](#)

CD9/I2/1 [Transport Evaluation Main Report \(Arup, February 2013\)](#)

CD9/I2/1 [Transport Evaluation, Appendix A, Weston \(Arup, February 2013\)](#)

CD9/E2 [Green Belt Review: Stage 1 \(Arup, April 2013\)](#)

- Further analysis was published in August/September 2013 and can be found here

CD0/LV/2 [World Heritage Site Setting and AONB Landscape and Visual Appraisal for Weston \(BANES, Sept 2013\)](#)

CD9/LV/1 [Heritage Asset Study \(Land Use Consultants, Sept 2013\)](#)

CD9/LV/1 [Heritage Asset Study, Appendix 2 \(Land Use Consultants, Sept2013\)](#)

CD9/E10 [Water Infrastructure and Geotechnical Prioritisation Report \(Arup, August 2013\)](#)

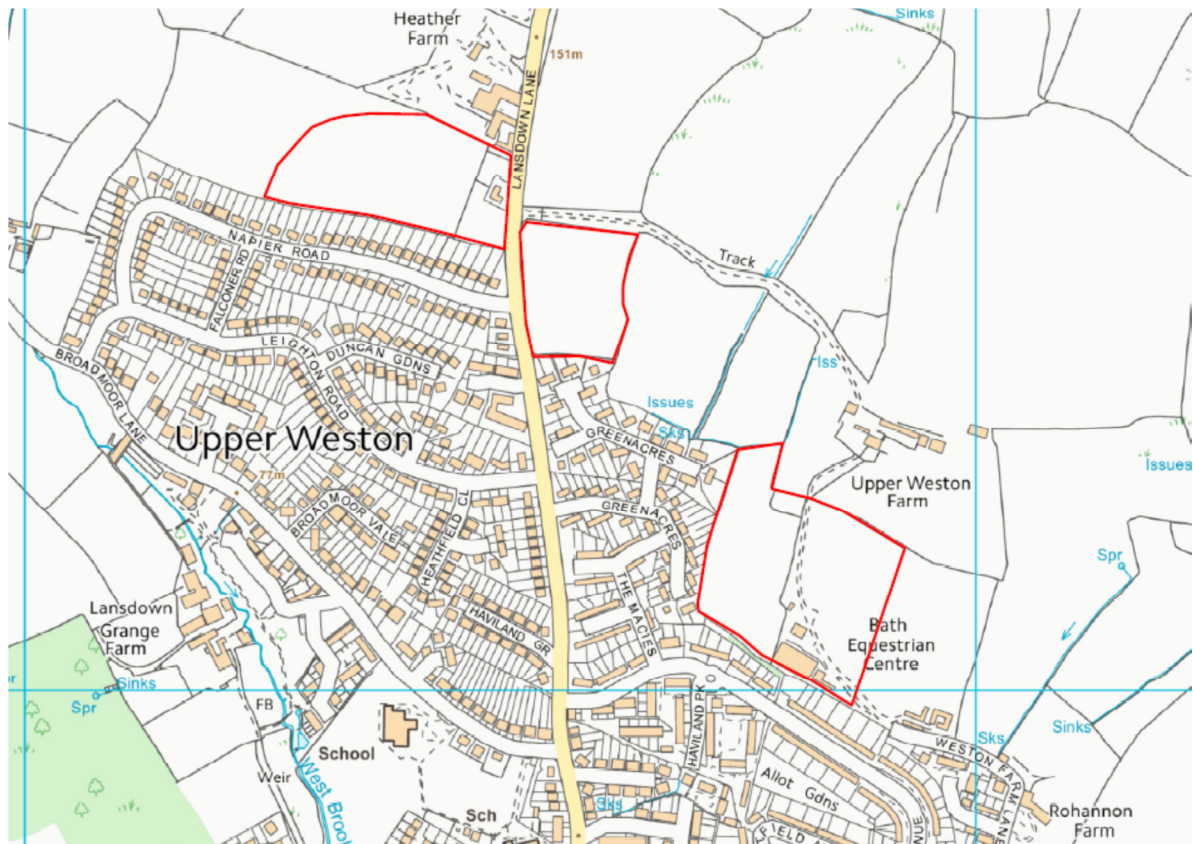
CD9/E9 [Green Belt Review: Stage 2 \(Arup, Sept 2013\)](#)

CD10/E9 Bath Urban Surveys - Dusk Bat Surveys for horseshoe bats around Weston, Bath - Surveys and Assessments Summer & Autumn 2013, Bat Pro (October 2013)

CD10/E12 Addendum to Landscape & Visual Impact Assessment: Weston & Odd Down (October 2013)

Conclusion

- Based on the above suite of analysis the Council has concluded that the following are the only areas that are suitable for development. Access to the equestrian centre requires third party land on Eastfield Avenue where a number of properties are owned by Curo.



Housing Potential

- The housing potential of the upper slopes (A 3ii) has not been assessed on account of the area not being suitable for development. There is no evidence of availability in this area.

Land Availability

- There is no evidence of availability in respect of the upper slopes.

Landscape and Visual Aspects

Existing Conditions

- The steep gently indented and extensive south west facing slopes of the River Avon and Weston Brook valleys. Fields are medium to large sized, bounded by untrimmed hedgerows with small to medium trees at the west side, more trimmed hedgerows to the east side, rising above predominantly residential development of two storey houses on the lower slopes with a distinctive edge to the urban area. Even though the area assessed is directly above urban development which occupies the lower slopes of the valley, it remains highly rural in character and contributes to the fine landscape setting to the city, this being an important characteristic of Bath. Scrub is developing in some of the higher fields. New woodland has been planted in two fields to the east of the area, and trees have a dominant presence in the area in the form of small copses, bands of woodland and hedgerow trees which create a soft character. There are just a few isolated farms on the east side of the area and a small scattering of residential properties at the head of the valley.

Landscape Impacts

- Development on the Upper Slopes would have a high impact on landscape character on the upper valley slopes as it would cause the loss of the present extent of rural fields which create a fine setting that contains the northern extent of the city's urban area. It would inevitably lead to the loss of the field pattern and hedgerows and trees.

Visual Impacts

- Extending development onto the Upper Slopes of the valley side would have a contrasting high impact. Views to the all-important green upper slopes and skyline which are so typical of the setting of the City would be replaced by urban development. Examples of views affected are those from the south facing hills of the River Avon valley, more limited views from the A4 entering Bath from the west, views from the Cotswolds Way and from various parts of Weston village.

Landscape and Visual Mitigation

- It would not be possible to mitigate development extending up the entire hillside as it would involve the loss of the characteristic rural setting to the city. Due to the topography the area is highly prominent and planting, even in many years time, could not mitigate housing at high densities in such a prominent location.

Historic Environment

Existing Conditions

- The Bath Conservation Area extends into the area, covering the open fields north of Primrose Hill. The SMR contains records of Romano-British finds and medieval strip lynchets at Upper Weston Farm.

Impacts

- There are concerns about the visibility of any development and its impact on the Bath Conservation Area. Development of the area could potentially have a very damaging effect on any buried archaeological remains, including Prehistoric, Roman and medieval activity and occupation

Mitigation

- The Bath Conservation Area and Listed Buildings could be protected by careful planning at Primrose Hill, with any development not extending too far up the valley slope above Upper Weston.
- Whilst there is the potential to preserve some archaeological sites within open spaces, this requires detailed knowledge of their actual location. Any proposed mitigation will require knowledge of the exact location, extent, date and significance of past settlements/activity. This will require fieldwork to examine the area such as trial trenching and/or geophysical survey.

World Heritage Site and Setting

- The study area straddles the World Heritage Site boundary and extends into the immediate setting of the World Heritage Site. The key characteristics and values of the World Heritage Site and its setting at this point are:
 - highly rural steeply sloping landscape setting to the World Heritage Site
 - highly prominent and extensive hillside rising above the widely visible urban edge, contributing to the World Heritage Site's green skyline
 - long distance views to the area from the west (particularly the key approaches to the World Heritage Site, the A4 and railway route), the Cotswolds Way, the valley bottom and southern slopes of the World Heritage Site
 - strong urban edge on lower valley slopes framed by rural countryside

- this area forms part of the distinctive geological landform in which the World Heritage Site lies.

Impacts

- Development on the upper slopes would have a high impact on the setting of the World Heritage Site, particularly causing the loss of the green backdrop and skyline which is so characteristic of this part of the World Heritage Site.

Mitigation

- No mitigation would be possible for development on the upper slopes.

Nature Conservation

Existing Conditions

- Sections of the area (particular in respect of the mid to upper slopes) are covered by a Strategic Nature Area (SNA). The area contains a concentration of fields with species-rich grassland (a BAP priority habitat) and records of Biodiversity Action Plan (BAP) priority species including skylark, yellowhammer, nightingale, pipistrelle bats and long-winged conehead.
- Primrose Hill (Weston Hill) SNCI, Chelscombe and Lansdown Woods SNCI and Kingswodd School Fields SNCI directly affect the upper slopes.
- There are several substantial hedges in parts of this area which may be important and qualify as species rich hedgerows (a BAP priority habitat), but have not been surveyed.

Impacts

- Development within the SNA covered sections would cause significant habitat fragmentation in an area of high ecological importance and reduce the area of strategic capacity for habitat restoration and enhancement. It is likely that the SNA would suffer indirect impacts through development of non-SNA designated land through the resultant urban fringe pressures. Development of the eastern side of the area could also impact on the SNCIs through the resultant added urban fringe pressures. Development of fields containing species rich grassland would lead to loss or deterioration of this BAP priority habitat, as could potentially be the case with particular hedgerows. Development on the western edge of the area would impact upon the immediate foraging grounds of a sizeable pipistrelle roost in that area.

Mitigation

- The loss of land from the SNA cannot be mitigated. Some degree of compensation could be achieved through off site habitat enhancement and long-term management at an appropriate location and scale, however the legal mechanisms are difficult and untested locally. Outside of the SNA it would remain difficult to mitigate for any development affecting SNCIs and the priority habitats. Buffer areas would be required to protect the SNCI sites as would protection and retention of key hedgerows.

Transport & Highways

- CD9/I2/1** [Transport Evaluation Main Report \(Arup, February 2013\)](#)
- CD9/I2/1** [Transport Evaluation, Appendix A, Weston \(Arup, February 2013\)](#)

Green Belt

- **CD9/E2** [Green Belt Review: Stage 1 \(Arup, April 2013\)](#)

Note: this assessment does not cover the Royal High Playing Field adjoin MoD Enleigh. The is assessed separately in appendix 1a (ref: Lan 5b)

Housing Potential

- The housing potential of this has not been assessed on account of it not being suitable for development. Further, there is no evidence that any land in this area is available for development this area.

Land Availability

- There is no evidence that any land in this area is available for development.

Landscape & Visual Aspects

Existing Conditions

- 133ha
- This area consists of the Cotswolds plateau which is open, exposed and fairly flat. Used extensively for playing fields with other recreational uses including a golf course and the Bath Racecourse. There are a few dwellings; also, park and ride and small scale farming use. Large fields bounded by dry stone walls in varying condition. Belts of mainly deciduous trees with some conifers along Lansdown Road and lines of trees, especially conifers, forming shelter belts at some field boundaries. Many boundaries are devoid of trees. The sky has a big presence here. Rural character with urban fringe influences from lighting, signage and playing fields. Views from more open parts of plateau to Charmy Down and hills beyond. The main part of the open Cotswold plateau extends northwards from a development line that peters out towards the top of the Lansdown slopes and is surrounded on most of its boundary by rural fields. The area is separated from the urban area.

Landscape Impacts

- Development would have a high impact on the plateau as it would destroy the open exposed characteristic of plateau. Development on the plateau would be a significant departure to Bath's character (north of the river) of being well contained by the surrounding topography. It would have a high impact due to the inevitable loss of trees and dry stone walls.

Visual Impacts

- Development would have a high impact on views from the Lansdown Road, a major route into Bath, through the loss of the rural views and openness and fragmentation of characteristic dry stone walls and lines of trees. Development would have a high impact on views from the public rights of way crossing the plateau through loss of rural views. The impact would be high because development

would appear isolated because of its poor connectivity with the city. The impact on wider views would be high; some development would be visible beyond the plateau and by night lighting would be intrusive on the skyline over a large area. Existing lighting from the park and ride illustrates the intrusive nature of lighting on the plateau as it can be seen over many miles.

Mitigation

- There is low potential in terms of mitigating skyline development affecting the wider rural landscape. There is some potential in local terms if small scale development was considered as it would be relatively easy to establish good screening tree belts.

Historic Environment

Existing Conditions

- Two Bronze Age round barrows (Scheduled Ancient Monument) lie immediately to the north of the area the Blathwayt Arms at Lansdown.
- To the south of the area are Beckfords Tower (Grade I) and Lansdown Cemetery.
- At Lansdown the SMR contains records of Prehistoric flints and Bronze Age barrows/finds and a medieval chapel with burials.

Impact

- Development of the area could potentially have a very damaging effect on any buried archaeological remains, including Prehistoric, Roman and medieval activity and occupation at Development would have to respect the setting of Beckfords Tower.

Mitigation

- Whilst there is the potential to preserve some archaeological sites within open spaces, this requires detailed knowledge of their actual location. Any proposed mitigation would therefore require knowledge of the exact location, extent, date and significance of past settlements/activity. This would require fieldwork to examine the area such as trial trenching and/or geophysical survey.

World Heritage Site and Setting

Existing Conditions

- The area straddles the World Heritage Site boundary and extends into the immediate setting of the World Heritage Site. The key characteristics and values of the World Heritage Site and its setting at this point are:
 - distinctive rural open plateau setting and approach to the city which is largely hidden until arrival at its edge
 - Roman Road approaching the World Heritage Site through a complex archaeological landscape, with potential for associated Roman archaeological remains
 - little feeling of connection with the city

- this area forms part of the distinctive geological landform in which the World Heritage Site lies.

Impacts

- Development on the plateau would alter the rural character of this part of the setting of the World Heritage Site and extend the city out away from the bowl in which it sits, thereby newly revealing the urban area to a wide area of countryside.

Mitigation

- It would be difficult to mitigate against development in this area due to its skyline position and open nature.

Nature Conservation

Existing Conditions

- Much of the area is covered by a Strategic Nature Area (SNA). Numerous SNCI's and Biodiversity Action Plan priority habitats and species fall within the SNA.
- The area lies within 4.5km of the Bath and Bradford on Avon SAC, designated for it's horseshoe bats.
- Kingswood school Playing field SNCI falls within this area and the Langridge-Wooley Complex SNCI adjoins to the north

Impacts

- Development within the SNA would cause significant habitat fragmentation in an area of high ecological importance and reduce the area of strategic capacity for habitat restoration and enhancement. Likely that the SNA would suffer indirect impacts through development of the adjoining land from urban fringe pressures. Development in the land not covered by the SNA could impact on the SNCIs and notable species and habitats found within them as would be the case inside the SNA.

Mitigation

- As areas identified as the best in the region to conserve, create and connect wildlife habitat at a landscape scale the loss of land from the SNA would be difficult to mitigate. Some degree of compensation could be achieved through off site habitat enhancement and long-term management at an appropriate location and scale, however the legal mechanisms are difficult and untested locally. Outside of the SNA it would remain difficult to mitigate for any development affecting the SNCIs and the priority habitats.

Transport & Highways

- Not assessed given environmental constraints and absence of land availability

Green Belt

- **CD9/E2** [Green Belt Review: Stage 1 \(Arup, April 2013\)](#)

Housing Potential

- The housing potential of this has not been assessed on account of it not being suitable for development. Further, there is no evidence that any land in this area is available for development here.

Land Availability

- There is no evidence that any land in this area is available for development.

Landscape & Visual Aspects

Existing Conditions

- 83ha
- A small steep sided valley indenting the River Avon Valley. There is a characteristic band of woodland on the slopes above Charlcombe and more woodland further down. Medium sized fields used for grazing, bounded by clipped and taller hedgerows, occasional scattered trees in hedgerows and fields. Charlcombe village nestles on the hillside well surrounded by trees. There is a sense of the valley being intimate and tucked away yet is it highly visible from Bathampton Down across the River Avon Valley where the open fields contribute to the characteristic rural landscape setting to the city. A narrow lane winds its way around the valley.

Landscape Impacts

- Development of this valley would have a high impact on the highly rural landscape that is part of the important rural setting to the city. The existing edge of settlement here is well defined and any further development would have a high impact by causing the loss of trees and hedgerows which presently emphasise the limit of the urban area. It would have a high impact from Charlcombe village, which presently enjoys an intimate and peaceful rural setting on the valley sides.

Visual Impacts

- Development would have a high impact on this landscape that is highly visible from across the River Avon Valley. The impact would be high on views from three public rights of way which rise up the hillside and the minor roads at the edge of the area and leading to Charlcombe. Existing residential occupiers adjacent to the fields would be highly impacted by loss of rural views.

Mitigation

- Effective mitigation would not be possible given the highly visible nature of the valley afforded by being on the upper slopes of the Charlcombe Valley. Furthermore, it is not possible to mitigate the loss

of the contribution this landscape makes to the important landscaped setting along the north part of the city.

Historic Environment

Existing Conditions

- The Charlcombe Conservation Area lies within the appraisal area covering the whole of the historic medieval village.

Impacts

- There are serious concerns about the visibility of any development and its impact on the setting of the Charlcombe Conservation Area.
- Development of the area could potentially have a very damaging effect on any buried archaeological remains, including Prehistoric, Roman and medieval activity and.

Mitigation

- Whilst there is the potential to preserve some archaeological sites within open spaces, this requires detailed knowledge of their actual location. However, it is difficult to see how the impact on the settings of the Listed Buildings and rural character of the Conservation Areas could be mitigated.

World Heritage Site and Setting

Existing Conditions

- The area straddles the World Heritage Site boundary and extends into the immediate setting of the World Heritage Site. The key characteristics and values of the World Heritage Site and its setting at this point are:
 - highly visible steep sided valley against a well-defined urban edge
 - rural in character, well treed
 - this area forms part of the distinctive geological landform in which the World Heritage Site lies.

Impacts

- Development in this area would have a high impact on its rural character and on its role as rural setting to the World Heritage Site.

Mitigation

- Due to the prominent nature of this sloping area it would not be possible to mitigate against development here, either from impact on local rural character or on its character as rural setting to the urban World Heritage Site.

Nature Conservation

Existing Conditions

- The northern part of this area is covered by a Strategic Nature Area (SNA). Numerous SNCI's and Biodiversity Action Plan priority habitats and species fall within the SNA.
- The majority of the area is covered by the Charlcombe Farm SNCI, Charlcombe Valley SNCI and Charclombe Lane Field SNCI
- There are several substantial hedges in parts of this area which may be important and qualify as species rich hedgerows (a BAP priority habitat), but have not been surveyed.

Nature Conservation Impacts

- Development within the SNA would cause significant habitat fragmentation in an area of high ecological importance and reduce the area of strategic capacity for habitat restoration and enhancement. It is likely that the SNA would suffer indirect impacts through development of the adjoining land from urban fringe pressures. Development in the land not covered by the SNA could impact on the SNCIs and notable species and habitats found within them as would be the case inside the SNA.

Nature Conservation Mitigation

- As areas identified as the best in the region to conserve, create and connect wildlife habitat at a landscape scale the loss of land from the SNA would be difficult to mitigate. Some degree of compensation could be achieved through off site habitat enhancement and long-term management at an appropriate location and scale, however the legal mechanisms are difficult and untested locally. Outside of the SNA it would remain difficult to mitigate for any development affecting the SNCIs and the priority habitats.

Transport & Highways

- Not assessed given environmental constraints and absence of land availability

Green Belt Purposes

- **CD9/E2** [Green Belt Review: Stage 1 \(Arup, April 2013\)](#)

Housing Potential

- The housing potential of this area has not been assessed on account of it not being suitable for development.

Land Availability

- There is no evidence that any land in this area is available for development.

Landscape & Visual Aspects

Existing Conditions

- This is the broad steeply sloping valley of the Lam Brook. The valley is well overlooked from the A46, from minor lanes in and around the area and from Little Solsbury Hill and across the River Avon Valley at Bathampton Down and Brown's Folly wood; important local landmarks. The medium sized fields are bound by clipped and taller hedgerows; sparser hedgerows generally located on the east facing slopes, and some fields have an undulating surface. The hedgerows and high banks defining the lane between Larkhall and Woolley are particularly distinctive in that they are very neat and clipped, quite broad and emphasise the bending and undulating character of the lane. The course of the brook is well marked by rows of trees. There are individual trees in a few fields. This area has a rural character with scattered individual dwellings and farms and one small group of a dozen dwellings. If it were not for the A46 it would be peaceful, but the years have softened the impact of the road on this attractive valley. The area is not well connected to the built up area of Larkhall whose northerly extent is well contained at Valley View Road and relates visually more to the R. Avon valley. Minor roads follow the contours on each side of the valley leading to Woolley and Upper Swainswick.

Landscape Impacts

- Development would have a high impact on openness and rural character. It would not be well connected to the urban area so would feel very isolated. Development would cause the loss of hedgerows, and because some of them are rather sparse they would unlikely to be able to be retained in a development so the historic field pattern would be lost. Fuller hedgerows would also be lost or fragmented by development. The distinctive hedgerows along Woolley Lane would likely be lost.

Visual Impacts

- Development would have a high impact on rural views from the A46; the most important route entering the city from the north, from lanes, and from public rights of way further up the valley and on Little Solsbury Hill. It would have a high impact from the nearby landmarks – Little Solsbury Hill, Brown's Folly wood and Bathampton Down as this valley contributes to the important landscape setting north of the city – a characteristic of Bath.

Mitigation

- Due to the high visibility of the valley from footpaths, the A46, lanes and dwellings, it would not be possible to effectively mitigate the loss of the rural valley character and views.

Historic Environment

Existing Conditions

- Twinfield Farmhouse (Grade II) represent the only designated heritage asset in this area

World Heritage Site and Setting

Existing Conditions

- The study area abuts the World Heritage Site boundary and lies within the immediate setting of the World Heritage Site. The key characteristics and values of the World Heritage Site setting at this point are:
 - steep sided valley with close relationship to Little Solsbury Hill
 - rural character with the urban edge of the World Heritage Site (at Larkhall) well contained
 - this area forms part of the distinctive geological landform in which the World Heritage Site lies.

Impacts

- Development in this area would have a high impact on its rural character and its isolation from the urban area. Development here would also bring the urban edge out further into the countryside and into wider view, particularly from the A46 approach to Bath. It would urbanise the rural setting of the World Heritage Site.

Mitigation

- It would not be possible to mitigate development in this area due to its high prominence.

Nature Conservation

Existing Conditions

- Partly within a Strategic Nature Area
- Relatively unencumbered by SNCIs but includes the Lam Brook Corridor SNCI and area (c) of the Langrise Woolley Complex SNCI.
- There are several substantial hedges in parts of this area which may be important and qualify as species rich hedgerows (a BAP priority habitat), but have not been surveyed.
- The area contains a high percentage of fields of species rich grassland (a BAP priority habitat), particularly as well as broad-leaved woodland (a BAP priority habitat) and a number of records of BAP priority species.

Nature Conservation Impacts

- Development within the SNA would cause significant habitat fragmentation in an area of high ecological importance and reduce the area of strategic capacity for habitat restoration and enhancement. It is likely that the SNA would suffer indirect impacts through development of the adjoining land from urban fringe pressures. Development in the land not covered by the SNA could impact on the SNCIs and notable species and habitats found within them as would be the case inside the SNA.

Nature Conservation Mitigation

- As areas identified as the best in the region to conserve, create and connect wildlife habitat at a landscape scale the loss of land from the SNA would be difficult to mitigate. Some degree of compensation could be achieved through off site habitat enhancement and long-term management at an appropriate location and scale, however the legal mechanisms are difficult and untested locally. Outside of the SNA it would remain difficult to mitigate for any development affecting the SNCIs and the priority habitats.

Transport & Highways

- Not assessed given environmental constraints and absence of land availability

Green Belt Purposes

- **CD9/E2** [Green Belt Review: Stage 1 \(Arup, April 2013\)](#)

Housing Potential

- The housing potential of this area has not been assessed on account of it not being suitable for development. Further, there is no evidence of availability in this area.

Land Availability

- There is no evidence that any land in this area is available for development.

Landscape & Visual Aspects

Existing Conditions

- Little Solsbury Hill is a prominent hill of historical importance that dominates the locality. It is prominent in views from nearby settlements and the surrounding landscape, including from well down the River Avon Valley opposite Claverton. It is highly rural in character. The small and medium sized fields are mainly grazed and bounded by neatly clipped hedgerows with few trees in them. A few taller hedgerows and scrub and developing woodland is present in some areas with wooded areas mostly on the higher slopes but with some at lower level. The presence of the fuller hedgerows and woodland softens the character. The hill top is pasture. The slope above Bathampton is quite indented. The A46 was cut into its lower slopes to the west, and narrow lanes or track circle the hill. Public rights of way rise up and go around parts of the hill.

Landscape Impacts

- Development would have a high impact on this strong local landscape feature. It would have a high impact on the open exposed character and distinctive landform. The hill is not connected to the urban area and relates to the wider rural landscape. Development would have a high impact on the well contained linear character of Northend and would intrude on the unique setting of Northend Church and Church Farm, commanding a hillside position above the village.

Visual Impacts

- Development would have a high impact on the many views to this prominent landmark; from roads, inter city rail, lanes, public rights of way and properties.

Mitigation

- There is very low potential for mitigation given the high prominence of this hill.

Historic Environment

Existing Conditions

- Little Solsbury Hill (Scheduled Ancient Monument) an Iron Age hillfort lies in the centre of the appraisal area, which therefore constitutes the monument's setting.
- Two Grade II Listed Buildings lie within the appraisal area – Field End and Bailbrook Mission Church.
- The SMR contains records of Prehistoric and Roman finds from Solsbury Hill, along with medieval field systems in and around the hillfort. A Bronze Age burial is also recorded south of the hillfort at Bailbrook Farm.

Impact

- Development of the area could potentially have a very damaging effect on any buried archaeological remains, including Prehistoric to Roman finds and medieval field systems. There are serious concerns about the visibility of any development in this area and its impact on the setting of Little Solsbury Hill (Scheduled Ancient Monument).

Mitigation

- Whilst there is the potential to preserve some below ground archaeological sites within open spaces, this requires detailed knowledge of their actual location. However, it is difficult to see how development could not impact on setting of the Scheduled Ancient Monument. From the summit of the hillfort there are clear views of the surrounding area, including the medieval field systems. Any proposed mitigation will require knowledge of the exact location, extent, date and significance of past settlements/activity. This would require fieldwork to examine the area such as trial trenching and/or geophysical survey. More detailed assessment would also be needed to address the wider impact on the historic environment, in particular the setting of Scheduled Ancient Monument.

World Heritage Site and Setting

Existing Conditions

- The study area abuts the World Heritage Site boundary and lies within the immediate setting of the World Heritage Site. The key characteristics and values of the World Heritage Site setting at this point are:
 - prominent Hillfort and natural landmark in a key gateway area to the World Heritage Site
 - highly rural in character, exposed and open landscape
 - open to wide views, particularly from transport routes leading to World Heritage Site (rail, road)
 - this area forms part of the distinctive geological landform in which the World Heritage Site lies.

Impacts

- Development in this area would have a high impact on this strongly rural natural feature, and would urbanise what is a key natural landmark in a gateway area to the World Heritage Site. This area is

not connected to the urban area and development would be very intrusive to the rural setting of the World Heritage Site.

Mitigation

- It would be very difficult to mitigate development in this area due to its prominence.

Nature Conservation

Existing Conditions

- The area is centred around the South Charmy Down SNCI and the vast majority of the area is covered by a Strategic Nature Area (SNA). Numerous SNCI's and Biodiversity Action Plan priority habitats and species fall within the SNA.
- The area lies within 2km of the Bath and Bradford on Avon SAC, designated for its horseshoe bats and there are further horseshoe bat roost records within and just outside area C7
- The section of land outside the SNA contains B&NES BAP species including pipistrelle bats and contains a high percentage of species-rich grassland and broadleaved woodland (BAP priority habitats).
- There are several substantial hedges in parts of this area which may be important and qualify as species rich hedgerows (a BAP priority habitat), but have not been surveyed.

Impacts

- The SNA and SNCIs significantly restrict development in this area.
- Development within the SNA would cause significant habitat fragmentation in an area of high ecological importance and reduce the area of strategic capacity for habitat restoration and enhancement. It is likely that the SNA would suffer indirect impacts through development of the adjoining land from urban fringe pressures. There would be further impacts on SNCIs and priority habitats.
- Development in or adjacent to the SNA could impact on the foraging grounds of bats associated with the nearby Browns Folly and Bathampton elements of the Bath & Bradford on Avon SAC. Due to proximity to the SAC an assessment of the likely significant effect upon the horseshoe bats would be required under the Habitat Regulations which would then inform whether an appropriate assessment was needed.
- Any parcels of land falling outside of the SNA or SNCI boundaries would need to be assessed in terms of their impacts upon them as well as in terms of the land parcel itself

Mitigation

- As areas identified as the best in the region to conserve, create and connect wildlife habitat at a landscape scale the loss of land from the SNA would be difficult to mitigate. Some degree of compensation could be achieved through off site habitat enhancement and long-term management at an appropriate location and scale, however the legal mechanisms are difficult and untested locally. Hedgerows, waterbodies, grazed pasture and woodland would be likely to be considered of particular

value for foraging bats and would need to be addressed. Further surveys would be needed probably including radio tracking to assess the effects of habitat fragmentation on the foraging bats. It would be difficult to mitigate for any development affecting the SNCIs and the priority habitats.

Transport & Highways

- Not assessed given environmental constraints and absence of land availability

Green Belt Purposes

- **CD9/E2** [Green Belt Review: Stage 1 \(Arup, April 2013\)](#)

Housing Potential

- The housing potential of this area has not been assessed on account of it not being suitable for development. Further, there is no evidence of availability in this area.

Land Availability

- There is no evidence that any land in this area is available for development.

Landscape & Visual Aspects

Existing Conditions

- This area comprises the steep north and north-west facing highly rural slopes above Bathampton rising up to Bathampton Down. The hillside is predominantly wooded with deciduous trees and a few fields above the settlement and at the skyline are grazed. Hedgerows are unclipped and scrub development is taking place within some of the fields which enhances the heavily treed character of this hillside. There are public rights of way throughout the area. There is a clear definition of the northern extent of the settlement with no development creeping up this rural hillside.

Landscape Impacts

- Development would have a high impact in that it would cause the loss of the characteristic strong woodland and field character of this prominent hillside around the edge of Bathampton Down. Existing development is linear along the A36 so any development would impact this character and create 'large estate' character.

Visual Impacts

- Development would have a high impact on the many views to this prominent hillside and landmark; from major roads (A4, A36 and A46), intercity railway, the village, settlements on the other side of the valley and many footpaths in the rural area.

Mitigation

- There is very low potential for mitigation given the highly prominent location of this hillside. Planting in the foreground of the 1.5 fields may soften the impact of limited development, although residents are likely to resist this in favour of an open view.

Historic Environment

Existing Conditions

- Bathampton Camp (Scheduled Ancient Monument) an Iron Age hillfort lies to the south of this area, which forms part the monument's setting.
- The area is bordered to the east and west by Bathwick and Bathampton ancient woodlands.
- The SMR contains numerous records revealing this to be a highly significant historic/archaeological landscape. These records include Bronze Age round barrows, Iron Age field systems, enclosures and occupation (including Bathampton Camp), Roman occupation and burials, the possible course of the Wansdyke, along with medieval strip lynchets, pillow mounds and deer park.

Impact

- Development of the area could potentially have a very damaging effect on any buried archaeological remains in what is a highly significant historic landscape – with monuments recording human occupation four millennia.
- Concerns about the visibility of any development in this area and its impact on the settings of Bathampton Camp (Scheduled Ancient Monument), areas of Ancient Woodland and the setting of the Bath Conservation Area.

Mitigation

- Whilst there is the potential to preserve some archaeological sites within open spaces, this requires detailed knowledge of their precise location. Any proposed mitigation will require knowledge of the exact location, extent, date and significance of past settlements/activity. This will require fieldwork to examine the area such as trial trenching and/or geophysical survey. More detailed assessment will also be needed to address the wider impact on the various historic environment designations.

World Heritage Site and Setting

- This area lies within the immediate setting of the World Heritage Site. The key characteristics and values of the World Heritage Site setting at this point are:
 - prominent wooded hillside that forms a natural landmark in a key gateway area to the World Heritage Site
 - area of long term historic occupation, including Roman archaeological remains and potential for Roman stone quarries which have direct relevance to the World Heritage Site
 - rural character, well treed
 - area forms part of the distinctive geological landform in which the World Heritage Site lies.

Impacts

- Development in this area would have a high impact on the rural character of this hillside, and would urbanise this key natural feature that forms a dramatic landscape backdrop to this gateway area.

Mitigation

- It would be very difficult to mitigate development on this prominent hillside.

Nature Conservation

Transport & Highways

- Not assessed given environmental constraints and absence of land availability

Green Belt Purposes

- **CD9/E2** [Green Belt Review: Stage 1 \(Arup, April 2013\)](#)

Area and Description

- 2.8ha
- The site forms part of the important green hillside of the Bathampton Down slopes.

Housing Potential

- Theoretically about 60 is developed at Minister way density of 100 at 30 dph

Suitability

- Any significant development is likely to intrude into views from viewpoints which are important to the World Heritage Site such as from Camden Crescent. The significance of this area as open green space is recognised by its inclusion in the Bath Conservation Area and the Cotswold Area of Outstanding Natural Beauty as well as contributing to the distinct character of the World Heritage Site. Development within this area would cause significant harm to these assets
- Within SNCI 76/37b and is mapped as a UK priority habitat (lowland meadow).
- The site is not suitable

Availability

- Promoted by landowner and prospective developer

- The site forms part of the lower slopes along the southern sides of Smallcombe Vale which is an important green hillside; an important characteristic of the World Heritage Site. the site is framed by housing at Tying End and Horseshoe Walk on two side but is open to Samllcombe Vale and land in national Trust ownership on the other two sides
- The significance of this area as open green space is recognised by its inclusion in the Bath Conservation Area and the Cotswold Area of Outstanding Natural Beauty as well as contributing to the distinct character of the World Heritage Site. Development within this area would cause significant harm to these assets.
- Access arrangements unconfirmed.
- Smallcombe vale is an important component of the Word Heritage Site and Conservation Area. Its undeveloped hillside should remain undeveloped.

Housing Potential

- The housing potential of this area has not been assessed on account of it not being suitable for development.

Land Availability

- Very limited evidence of land availability relating to the former Bathampton Timber Yard and a small field off Holcombe Lane

Landscape & Visual Aspects

Existing Conditions

- This area is located on the gently sloping floor of the River Avon valley. It comprises:

Area D10i

- These are fields (known as Bathampton Meadows) to the north of the A4 and to the east and west of Mill lane. They consist of open grazing land and a distinct hedgerow pattern with significant mature trees. Key characteristics of the site include the broad open valley floor of the River Avon looking across to the 'treed' meandering course of the river and to the surrounding wooded valley sides in which are nestled the settlements of Batheaston, Bathford and Bathampton. The area is open in character and devoid of intrusive elements with the exception of a line of pylons. The Batheaston Bypass despite being intrusive from certain views has been effectively mitigated at this location where the false cutting and recent planting largely hides the traffic from views along this part of Mill Lane and Bathampton Meadow. The Avon valley is a particularly significant feature forming a green finger of open land reaching to Walcot. It separates the areas of development of Bathampton and Batheaston.

Area D10ii

- This area straddles the Kennet and Avon Canal and is contained by the bend of the railway. The area is comprised mostly of grazing land and excludes the playing field of King Edwards School. It is mostly undeveloped but includes the old timber yard by Manor Farm (now a rather untidy looking indoor and outdoor storage facility). The area is open in character and forms part of the sweeping Avon Valley as it makes an abrupt westward turn towards Bath. The area can be sub-divided into three parcels: land north of Tynning Road; land east of the Kennet and Avon canal; and land at Holcombe Lane.

Area Diii

- This is a narrow strip of flat scrubland sandwiched between the Kennet and Avon canal and the railway.

Landscape Impacts

Area D10i

- Development would have a high impact as it would significantly disrupt the flow of the Avon valley.

Area D10ii

- Development would have a high impact as it would significantly disrupt the flow of the Avon valley. There may some scope for development at Holcombe Lane

Area Diii

- Low landscape impact

Visual Impacts

- There are a number of viewpoints into the area which are significant because of their location within the Cotswold AONB, their historic significance in relation to the World Heritage Site setting, and because of the popularity and qualities of the views. Three of the most significant include:

From Little Solsbury Hill

- This is one of only 2 or 3 locations outside the World Heritage Site which provides a view into the core of the Georgian centre seen in the context of, and providing an understanding of, the wider landscape context. It is therefore a key viewpoint in relation to an appreciation of the setting of the World Heritage Site. The view shows the open character of the Bathampton Meadows unspoilt by development in this view except for the A4 which crosses the valley near Lambrook. From the hill itself Batheaston is largely hidden from sight by the lower slopes. Bathampton is clearly visible nestling into the bottom of the Bathampton Down slopes. The historic core which is designated a Conservation Area with St Nicholas Church clearly seen in its rural context with open fields to the north, south and east. From this viewpoint development would have a significant impact on the open unspoilt character of the valley floor and on the setting of the Bathampton Conservation Area where new housing would occupy the middle distance in front of the village. In respect of area dii the impact would be In respect of area Diii

Brown's Folly

- Again the view shows the open character of the Bathampton Meadows unspoilt by development except for various activities around the old timber yard by Manor Farm. From this viewpoint it is evident that housing development at Bathampton Meadows would significantly affect the open green character of the valley floor. Development would in effect visually link to the developed areas of Bathampton Manor and Bathampton Mill which are marked by extensive wooded areas blocking the visual continuity of the open valley each side of Mill Lane.

Bathampton Down

- This viewpoint shows the relationship of Bathampton in the middle distance and Batheaston in the far distance clearly separated by the open landscape of the Avon valley floor. It is particularly evident how little there is in the way of intrusion along the valley at this location. The viewpoint is significant in relation to the World Heritage Site setting both because of the popularity of the location giving extensive views across the Avon valley and because of its historical context as part of one of Ralph Allen's carriage drives designed to take advantage of the views. Development on the valley floor would result in significant intrusion into the view and would result in a visual break in the flow of grazing land along the valley floor and visually would reduce the apparent separation between the villages of Bathampton and Batheaston.

Mitigation

- The impact of development would have a significant impact on landscape character and on views which could not be fully mitigated given the widely visible position of the site and its open and largely unspoilt valley floor character.

Historic Environment

Existing Conditions

-

Impacts

-

Mitigation

-

World Heritage Site and Setting

Existing Conditions

- The area lies within the immediate setting of the World Heritage Site. The key characteristics and values of the World Heritage Site setting at this point are:
 - distinctive river valley and open rural landscape
 - no visual connection with the urban area of Bath
 - prominent landscape in views from the north (i.e. Solsbury Hill, and particularly from two of the main public transport approaches to the World Heritage Site
 - this area forms part of the distinctive geological landform in which the World Heritage Site lies.

Impacts

- Development in this area would have a high impact on its rural character and would be inappropriate due to its lack of connection to the city.

Mitigation

- This would be very difficult in this area due to the prominence of the valley and its rural character, which would be urbanised.

Nature Conservation

Existing Conditions

-

Impacts

-

Mitigation

-

Transport & Highways

- Not assessed given environmental constraints and absence of land availability

Green Belt Purposes

- **CD9/E2** [Green Belt Review: Stage 1 \(Arup, April 2013\)](#)

Housing Potential

- The housing potential of this area has not been assessed on account of it not being suitable for development. Further, there is no evidence of availability in this area.

Land Availability

- There is no evidence that any land in this area is available for development.

Landscape & Visual Aspects

Existing Conditions

- A moderately broad steep sided valley with indented sides. Horsecombe Vale is a smaller more intimate valley off the Midford Brook. The rural valley is well wooded, particularly the upper third, and trees mark the course of the brook. Fields are grazed and small to medium; some have been amalgamated to make larger ones. Where this has happened, along with sparsely stocked / clipped hedgerows, the landscape is more open than the parts where woodland cover is strong and tall hedgerows are plentiful. In the east of the area a few small areas of Bath's development are seen along parts of the skyline but in a well treed setting. Apart from Monkton Combe low on the slopes, there are very few properties in the valley. Midford Castle stands high on the hill framed by woodland. There is no relationship with the urban area; where small areas of development are visible they are contained as well treed incidents like a sparse village along a ridge line. A few minor roads pass through the valley; public rights of way follow the brook and go up the hillsides.

Landscape Impacts

- Main Valley: Development would have a high impact due to loss of integrity of tranquil rural valley, also because of the loss of woodland, field pattern and the indented character of the hillsides. A high impact also because the area is not well related to the urban area and is more strongly linked to the wider rural area. Development would spoil the rural setting to Midford Castle.
- Horsecombe Vale Parts of Combe Down and Odd Down spill over the skyline to a much greater extent here. It appears intrusive and incongruous in such an attractive rural valley giving it an urban fringe feel. Development would have a high impact from roads (including the A36), footpaths and dwellings in local and longer views because of the high visibility of the valley.

Mitigation

- The potential for mitigation is low given the high visibility of the area arising from the topography. It is not possible to mitigate the loss of the heavily wooded character, intimate rural lanes and field pattern.

Historic Environment

Existing Conditions

- The appraisal area contains three areas of Ancient Woodlands – Claverton Wood and Priory Wood.
- Monkton Combe Conservation Area with Monkton Combe Lockup (Scheduled Ancient Monument) a stone prison/cell lies in the centre of the historic village.
- The appraisal area contains two Historic Parks and Gardens – Midford Castle and Combe Grove Manor (north of Monkton Combe).
- At least 52 Listed Buildings (mainly Grade II) lie within the appraisal area, including Midford Castle and industrial buildings such as De Montalt Mill.
- The SMR contains records of significant industrial archaeology in the area, such as De Montalt Mill, the Tucking Mill and tramway, various quarries and the Somerset Coal Canal. There is also evidence of earlier occupation such as medieval field systems and Roman finds at Combe Grove Farm.

Impact

- Development of the area could potentially have a very damaging effect on any archaeological remains, including the significant industrial archaeology and monuments within the appraisal area. There are concerns about the visibility of any development and its impact on the setting of Bath Main and Monkton Combe Conservation Areas, and Listed Buildings – between Combe Down and Monkton Combe

Mitigation

- Whilst there is the potential to preserve some archaeological sites within open spaces, this requires detailed knowledge of their actual location. However, it is difficult to see how the impact on the settings of the Listed Buildings and rural character of the Conservation Areas could be mitigated.

World Heritage Site and Setting

Existing Conditions

- The study area abuts the World Heritage Site boundary and lies in the immediate setting of the World Heritage Site. The key characteristics and values of the World Heritage Site setting at this point are:
 - Steep sided rural valley with the smaller Horsecombe Vale off to the west
 - Limited physical or visual relationship with the urban area and what development is visible in the main valley is softened by trees
 - Horsecombe Vale is one of the few places where the World Heritage Site can be seen spilling out from its bowl and down the outer slope, to the detriment of the rural surroundings and the character of Bath as a contained city
 - This area forms part of the distinctive geological landform in which the World Heritage Site lies.

Impacts

- Further development on the edges of Combe Down and Odd Down would extend the spillage of the World Heritage Site out from its landscape bowl and down the outer slopes, increasing the intrusion of urban development on the rural setting of the World Heritage Site. Development in the main Midford Valley would urbanise a distinctive rural environment and would be poorly connected to the existing urban area.

Mitigation

- It would be very difficult to mitigate development in this area due to its prominent nature and the incongruity of urban development in a rural environment.

Nature Conservation

Existing Conditions

Impact

Mitigation

Transport & Highways

- Not assessed given environmental constraints and absence of land availability

Green Belt Purposes

- **CD9/E2** [Green Belt Review: Stage 1 \(Arup, April 2013\)](#)

Housing Potential

- The housing potential of this area has not been assessed on account of it not being suitable for development.

Land Availability

- There is no evidence that any land in this area is available for development.

Landscape & Visual Aspects

Existing Conditions

- This valley exhibits a strong characteristic of Bath comprising countryside extending right into the urban area. Whilst there are urban influences of dwellings around and within the area, this intimate small valley retains a strong rural character. The complex topography and well treed character mean that within the valley only small parts of it are seen at the same time. It feels very separate and boldly contrasting to the urban area because the steep topography limits access to the valley; there being none from the west and a few very winding roads entering from the east. The roads are frequently bounded by high stone walls, buildings, hedgerows and even a water course – features which make an important contribution to the character of the valley. It's inclusion in the conservation area is well deserved. The valley is well wooded at all levels, with small fields bound by tall hedgerows. The abundant tree cover contributes to the intimate feeling in the valley by limiting views to only small areas at once. The valley includes a church and cemetery, a school and individual dwellings usually set within generous gardens. This is an important green lung within easy reach of a large population who walk the roads and course of a former railway which links to other parts of the city.

Landscape Impacts

- Development here would have a high impact on the unique character of this intimate hidden little valley. It would cause the loss of wooded area, hedgerow trees and narrow bounded walls which are crucial to its character. The presence of trees at the skyline is another important characteristic of Bath so their loss would contribute to erosion of the city's setting.

Visual Impacts

- Development would have a high impact on views from the roads, paths and properties in the area, and from properties along Greenway Lane which overlook the valley, from Beechen Cliff School and Alexandra Park in its prominent hilltop location.

Mitigation

- The potential to mitigate high density development would be low because of the high visibility of the area due to the topography and being overlooked from Ralph Allen Drive, Beechen Cliff School, Alexandra Park, properties in Greenway Lane and wider views from the National Trust landscape to the east.

Historic Environment

- **Existing Conditions**

- The appraisal area sits entirely within the Bath Conservation Area and includes the Abbey Cemetery and Perrymead RC Cemetery.
- The appraisal area contains two Historic Parks and Gardens – Widcombe Manor and Crowe Hall.
- At least 16 Grade II Listed Buildings lie within the appraisal area, and two Grade I Listed Buildings – Widcombe Manor House and its fountain.
- The SMR contains records of Roman and medieval activity within the appraisal area including a possible Roman cemetery and the site of old Widcombe Manor and fishponds.

Impact Assessment

- Development of the area could potentially have a very damaging effect on any archaeological remains, including the known Roman and medieval activity. There are concerns about the visibility of any development and its impact on the setting of the Bath Main Conservation Area, Listed Buildings and Historic Parks and Gardens, along with its proximity to Prior Park

Mitigation

- Whilst there is the potential to preserve some archaeological sites within open spaces, this requires detailed knowledge of their precise location and extent. However, it is difficult to see how the impact on the settings of the Conservation Area, Listed Buildings and Historic Parks and Gardens could be mitigated.

Additional Work

- Any proposed mitigation will require knowledge of the exact location, extent, date and significance of past settlements/activity. This will require fieldwork to examine the area such as trial trenching and/or geophysical survey. More detailed desk-based assessment will also be needed to address the wider impact on the historic environment, in particular the setting of the Conservation Area, Listed Buildings and Historic Parks and Gardens.

World Heritage Site & Setting

Existing Conditions

- The area lies within the World Heritage Site. The key characteristics and values of the WHS at this point are:
 - Distinctive rural character extending into the city itself, giving the WHS its characteristic intimate connection with the countryside.
 - steep topography and intimate feel, limited connection from within to the urban area around it
 - views into the valley from key sites such as Alexandra Park and Ralph Allen Drive, and from the National Trust skyline land to the east
 - this area forms part of the distinctive geological landform in which the World Heritage Site lies.

Impacts

- Development in this area would have a high impact on the rural hidden character of this valley, and would be detrimental to the character of the World Heritage Site as an urban site with a very rural feel.

Mitigation

- The prominent nature of the site, visible to key views from a wide area, would make it very difficult to mitigate the impact of development here.

Nature Conservation

Existing Conditions

- The area is dominated by the Lyncombe Vale and Perrymead Fields Sites of Nature Conservation Interest (SNCIs)
- The area lies within 1km of the Bath and Bradford on Avon SAC, designated for its horseshoe bats and forms part of their foraging area. There are further horseshoe bat roost records within the area itself.
- English Nature Report no 174 states a management objective for feeding areas for greater horseshoe bats to “restrain creeping urbanisation into the 3-4 km area around breeding sites by opposing building developments through planning procedures”.
- The area additionally contains records of Avon BAP priority species including white helleborine and bath asparagus with much of the land described as semi-improved neutral grassland.
- There are several substantial hedges in parts of this area which may be important and qualify as species rich hedgerows (a BAP priority habitat), but have not been surveyed.

Impacts

- There would be likely significant impacts on the SNCIs and priority habitats. Development would impact on the foraging grounds of bats associated with the nearby Combe Down element of the Bath & Bradford on Avon SAC. Radio tracking of the Combe Down bats showed the area to be used for foraging, and the loss of woodland, grassland and surrounding large hedgerows would impact upon the bats.

Mitigation

- Further surveys would be needed probably including radio tracking to assess the effects of habitat fragmentation on the foraging bats which would be likely to be significant. Particular issues would include the loss of suitable foraging grounds within range of the SAC, effects upon the bats roosting within the area itself and fragmentation of flight paths. Within the SNCIs compensatory provision of at least equal value would be required should material factors regarding development be judged sufficient to override the local biological and community/amenity value of the site.

Transport & Highways

- Not assessed given environmental constraints and absence of land availability

Green Belt Purposes

- **CD9/E2** [Green Belt Review: Stage 1 \(Arup, April 2013\)](#)

Additional Analysis (Combe House D12a)

- The site forms part of the lower slopes along the southern sides of Lyncombe Vale which is an important green hillside; an important characteristic of the World Heritage Site. The significance of this area as open green space is recognised by its inclusion in the Bath Conservation Area and the Cotswold Area of Outstanding Natural Beauty as well as contributing to the distinct character of the World Heritage Site. Development within this area would cause significant harm to these assets.
- Highways access cannot be enhanced to enable intensification.
- The site is part of SNCI 76/74 The site was last surveyed in 1990 and is identified as needing more survey to confirm extent of high quality habitat and site boundaries

- The site is not suitable.

Housing Potential

- The housing potential of this area has not been assessed on account of it not being suitable for development. Further, there is no evidence of availability in this area.

Land Availability

- There is no evidence that any land in this area is available for development.

Landscape & Visual Aspects

Existing conditions

- This valley is similar to Midford Valley but is wider and there is a greater extent of open pasture to woodland. Hedgerows vary from clipped to taller unmanaged ones which contribute to the soft well treed character. Much of Southstoke is screened by trees, except for a handful of houses spread along the ridgeline among trees. There are scattered farms and dwellings in the valley but there is no relationship with the urban area. There are very few minor roads and the area is tranquil. The valley is a haven for walkers as public rights of way are present throughout the valley.

Landscape Impacts

- Development would have a high impact on the highly rural character and integrity of this valley. It would involve the loss of woodland and hedgerows and intimate little rural lanes. It would not relate to the urban area.

Visual Impacts

- Development would have a high impact due to the high visibility within the valley from roads, footpaths and properties. Urban development would appear incongruent in such a rural setting with no visual connection to the urban area.

Mitigation

- Low potential for mitigating development due to location on widely visible prominent slopes. Much of Southstoke has been screened by trees growing on the lower slopes and within gardens in the village. This has happened over decades (centuries for the larger trees). Southstoke is a very picturesque village that responds well to the topography so screening the village would not have been deliberate. There would not be the same scope for screening new urban development at the higher densities currently required.

Historic Environment

Existing conditions

- The Southstoke Conservation Area lies to the north of this area
- Within 200m of this area there is evidence of Prehistoric activity in the form of flint scatters. Along with Bronze Age and Roman occupation south-west of Sulis Manor.

Impact

- Development of the area could potentially have a very damaging effect on any buried archaeological remains, including Prehistoric and Roman occupation in the area.
- There are concerns about the impact of development in the Cam Valley on the on rural setting of Southstoke Conservation Area.

Mitigation

- Whilst there is potential to preserve some archaeological sites within open spaces, this requires detailed knowledge of their actual location.
- It would not be possible to protect the setting and the rural character of Southstoke Conservation Area.

World Heritage Site and Setting

Existing conditions

- The area abuts the World Heritage Site boundary and lies within the immediate setting of the World Heritage Site. The key characteristics and values of the World Heritage Site setting at this point are:
 - distinctive rural open valley with views to and from the wider landscape to the south
 - there is no visual relationship with the city, which is hidden up on the plateau
 - rural approach to the city up through Southstoke which is a distinct and separate village.
 - this area forms part of the distinctive geological landform in which the World Heritage Site lies.

Impacts

- Development in this area would have a high impact on the rural character and make the city newly visible to a wide area of countryside, urbanising the area. The development would not visually appear to be part of the city.

Mitigation

- The prominent nature of this area would make it very difficult to mitigate development here, particularly considering the steep topography.

Nature Conservation

Existing conditions

- The vast majority of the area is covered by a Strategic Nature Area (SNA). SNCI's and Biodiversity Action Plan priority habitats and species fall within the SNA.
- The area is dominated by the Fullers Earthworks-Southstoke Complex SNCI (BN294). Other SNCIs include Hodshill Fields (BN212) and South of Park Horse Farm (BN110), Week Wood (BN115), Bellflower Hill (BN116) and Cam Brook (BN207)
- The area lies within 1km of the Bath and Bradford on Avon SAC, designated for it's horseshoe bats and there are further horseshoe bat roost records within this area.
- English Nature Report no 174 states a management objective for feeding areas for greater horseshoe bats to "restrain creeping urbanisation into the 3-4 km area around breeding sites by opposing building developments through planning procedures".
- Areas of land outside the SNA were still shown to be utilised by foraging bats and also contain records of Avon BAP priority species including slow-worm and bath asparagus.
- There are several substantial hedges in parts of this area which may be important and qualify as species rich hedgerows (a BAP priority habitat), but have not been surveyed.

Impacts

- Development within the SNA would cause significant habitat fragmentation in an area of high ecological importance and reduce the area of strategic capacity for habitat restoration and enhancement. It is likely that the SNA would suffer indirect impacts through development of the adjoining land from urban fringe pressures. There would be further impacts on SNCIs and priority habitats. Development in the land not covered by the SNA would impact on the foraging grounds of bats associated with the nearby Combe Down element of the Bath & Bradford on Avon SAC, this would also apply to land within the SNA. It is likely that the integrity of the SAC would be adversely affected. Radio tracking of the Combe Down bats showed that area 13 was a key foraging area for them. There was no record of them utilising area 14 though their flight path abutted this area.

Mitigation

- As areas identified as the best in the region to conserve, create and connect wildlife habitat at a landscape scale the loss of land from the SNA would be difficult to mitigate. Some degree of compensation could be achieved through off site habitat enhancement and long-term management at an appropriate location and scale, however the legal mechanisms are difficult and untested locally. Hedgerows, waterbodies, grazed pasture and woodland would be likely to be considered of particular value for foraging bats across the area and would need to be addressed. Further surveys would be needed probably including radio tracking to assess the effects of habitat fragmentation on the foraging bats which would be likely to be significant. Although area 12 is currently the key area section upon which the bats rely development in area 13 would also have an impact and would need to be robustly mitigated for. This would be likely to require the form of buffering development with vegetation to allow a continued flight line and to block light pollution. Area 13 despite it's current lack of shown use by the colony additionally has good potential to become part of their key feeding area if grazing were to be initiated. Within the SNCIs compensatory provision of at least equal value would be required should material factors regarding development be judged sufficient to override the local biological and community/amenity value of the site.

Transport & Highways

- Not assessed given environmental constraints and absence of land availability

Green Belt Purposes

- **CD9/E2** [Green Belt Review: Stage 1 \(Arup, April 2013\)](#)

Housing Potential

- The housing potential of this area is judged by the Council 300, although this capacity is contested by the landowner who considers that 800-1,000 units is achievable. A study commissioned by the Council (referenced below) and published in April 2013 suggested a capacity of about 700. This has now been reduced on account of further evidence being gathered on the impact of development on the Wansdyke SAM and its setting and on the impact on the OUV of the World Heritage site re the visual containment of the city in respect of views from the surrounding countryside. As well as these constraints the unique issue of horseshoe bats and their foraging grounds present a further and unique constraint, but one that doesn't preclude the development of the site so long as it is designed correctly re ecological matters.

Land Availability

- All of this area (comprising 43ha) is available for development and its general extent of this area is shown below. Please note that the area extend marginally to the right of the aerial photograph to include the entirety triangular field bordering Combe Hay lane.



Analysis

- This area was first assessed during the preparation of the now abandoned RSS for the South West. An environmental capacity appraisal was published in 2007 and covered landscape and visual matters, archaeology, historic environment and world heritage, and nature conservation.

CD4/UDL23 [Urban Extension Environmental Capacity Appraisal: Land within the AONB surrounding Bath \(BANES, March 2007\)](#)

- The Proposed Changes to the Core Strategy (March 2013) were accompanied by the following pieces of evidence.

CD9/CO3 [Land adjoining Odd Down Development Concept Options Report \(Arup, April 2013\)](#)

CD9/CO3/1 [Odd Down Landscape and Visual Study \(Arup 2013\)](#)

CD9/E2 [Green Belt Review: Stage 1 \(Arup, April 2013\)](#)

- Further analysis was published in August/September 2013 and can be found here

CD9/LV/3 [World Heritage Site Setting and AONB Landscape and Visual Appraisal for Land adjoining Odd Down \(BANES, September 2013\)](#)

CD9/LV/1 [Heritage Asset Study \(Land Use Consultants, September 2013\)](#)

CD9/LV/1 [Heritage Asset Study, Appendix 3 \(Land Use Consultants, September 2013\)](#)

CD9/E5 [Preliminary Ecological Surveys and Assessment: Bath Urban Extension: Location Option 3 - Odd Down/South Stoke \(1.8 MB\), Bristol Regional Environmental Records Centre \(2008\) \(\[published May 2013\]](#)

CD9/E7 [Bath Urban Surveys: Dusk bat surveys for horseshoe bats around south-western Bath - Assessments Summer 2008 \(1.3 MB\), BatPro Ltd. \(December 2008\)](#)

CD9/E8 [Bath Urban Surveys: Dusk bat surveys for horseshoe bats around south- western Bath Assessments Summer 2008 & Spring 2009 \(5.0 MB\), BatPro Ltd. \(June 2009\)](#)

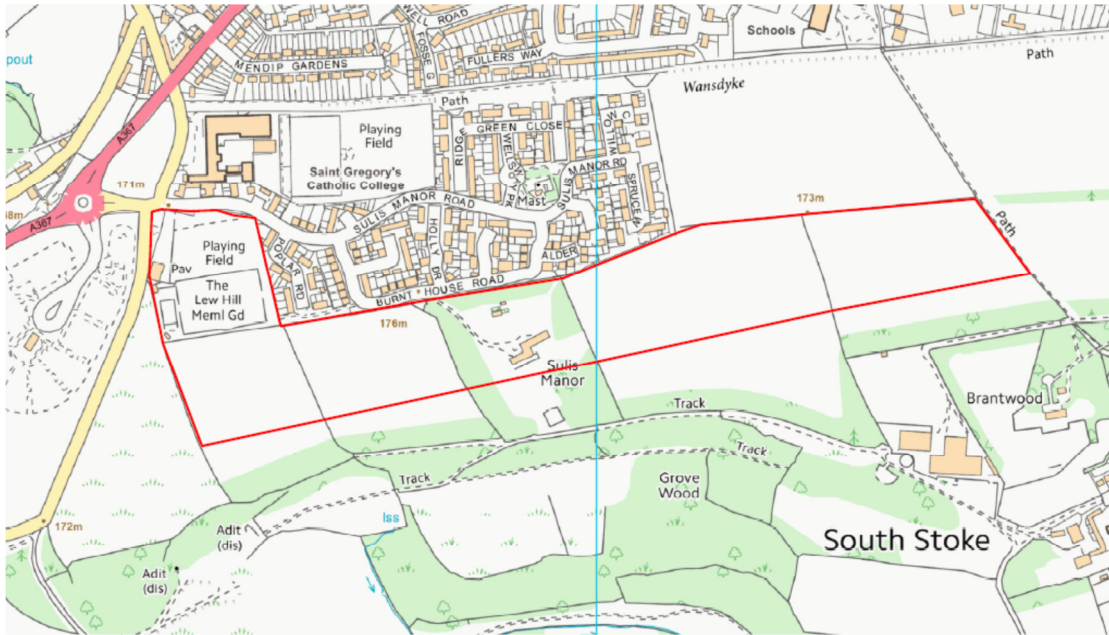
CD9/E14 [Combe Down Greater Horseshoe Bats: radio tracking study \(Geoff Billington\) and Bat Activity at Combe Down Mines during the summer and autumn 2000 \(Katie Parsons\) \(2000\)](#)

CD9/E9 [Green Belt Review: Stage 2 \(Arup, Sept 2013\)](#)

CD10/E12 Addendum to Landscape & Visual Impact Assessment: Weston & Odd Down (October 2013)

Conclusion

- Based on the above suite of analysis the Council has concluded that the following land area the only areas that suitable for development.



Area and Description

- This area comprises three parcels of land
 E14bi - Land accessed from Cranleigh (2.2ha)
 E14bii - A former nursery to the south with a minor access form Packhorse Lane (2.1ha)
 E14biii - A visually more exposed area fronting Pack Horse Lane (2.5ha)
- These areas of open green space are important to the setting of both the South Stoke Conservation Area and the City of Bath World Heritage Site. This value as open green space is also recognised by their inclusion within the Cotswold Area of Outstanding Natural Beauty.

Housing Potential

- The three land parcels between Midford Road and Pack Horse Lane comprise some 6.8ha in total. The surrounding housing development is very low density in nature. A low density capacity at 15 dph would theoretically yield about 100 houses but his would rise to 170 at 25dph

	15dph	25dph
E14bi	30	55
E14bii	30	55
E14biii	40	60
Totals	100	170

Suitability

- Any significant development of these areas would lead to harm to the settings of the Conservation Area and World Heritage Site and potential harm to the significance of these heritage assets. They would also cause harm to the Area of Outstanding Natural Beauty.
- Development at E14bii and biii locations would be inappropriate. The sites are located at the edge of the plateau on a spur where the land starts to fall away to the east. While there is a reasonable vegetative cover surrounding the sites (and within part of the southern part) any significant development at these locations is likely to significantly intrude into wider views. The eastern part in particular is valuable as green space linking the public rights of way around South Stoke to the Public Rights of Way network to the east.
- E14bi is a pleasant paddock/small field hidden from wider views. The impact of development on the landscape to the south would be low but the visual impact on homes surrounding the site would be substantial. Against the background of the Council’s assessment of suitability for E14a re landscape and visual impact, E14bi is deemed suitable However the site is suitable for a sensitively designed scheme that was respectively of its context.
- Not designated re ecology but habitat appears interesting and surveys required to confirm suitability here.

Land Availability

- E145bi and iii are understood to be available for development and the landowner also control the access from Midford Road. There is uncertainty in respect of E14ii

Housing Potential

- The housing potential of this area has not been assessed on account of it not being suitable for development.

Land Availability

- There is no evidence that any land in this area is available for development.

Landscape and visual effects

Existing Conditions

- Small tongue of Cotswold plateau edge (within the Cotswold Plateaux and Valleys Character Area) forming a prominent ridge extending south west of the city along the A367. Land uses comprise open arable and the old Fuller's Earth Works site which is now a recycling centre with an adjacent field partly used for bike scrambling to the south of the road. The Fuller's Earth site has some mature trees along the entrance road and also some trees on the south eastern boundary. Hedges border the majority of the fields. The land to the south and east of the area is within the Cotswold Area of Outstanding Natural Beauty (AONB) and is contiguous along part of the appraisal areas southern boundary.
- The area occupies a skyline position, there are currently extensive views from the site to the attractive countryside to the north and south west and the site is viewed from various Public Rights of Way (PROWs), lanes and properties (in the countryside, city edge to the north west and the area around Combe Hay to the south east of the site). Views from the south east are all from within the Cotswold Area of Outstanding Natural Beauty (AONB). In addition the site is viewed from the A367 which crosses through the area.

Landscape impact

- Development at this location would result in loss of the characteristic open plateau countryside west of the A367 Fuller's Earth works would be incorporated into the development area providing opportunity to reuse existing buildings. There would be impacts on the adjacent Hinton Blewett and Newton St Loe Plateau Lands Character Area to the north west and the Cam and Wellow Brook Valleys Character Area and the Cotswold Area of Outstanding Natural Beauty to the south east due to development encroaching onto the rural skyline. There would be a negative effect on dark skies due to the skyline nature of the development and the gently sloping fields on the top of the plateau.

Visual impact

- From view points to the North and North West there would be a loss of an extensive length of rural skyline of hedges and trees, loss of the rural hillside view and introduction of urban character disconnected from the existing urban area. Lighting would extend out from the city into an area currently characterised by dark sky. Mitigation through tree planting would take at least 20 years before it would start to become effective.
- From view points to South West and AONB there are clear views of the skyline from lanes, PROWs and properties especially at the edge of Combe Hay. The skyline is attractive with trees and open land. Development would alter the skyline such that part of two storey buildings south of the A367

would be visible for at least 20 years before any mitigating planting became effective. The effect on dark skies would be high and difficult to mitigate. The countryside which is within the Area of Outstanding Natural Beauty is of a very high quality. Skyline development from these views is atypical and would be detrimental to the quality of the Area of Outstanding Natural Beauty.

Mitigation

- Extensive tree planting would be required to screen / soften any proposed development. Tree establishment on exposed sites can be difficult and would require persistent and effective tree management to be set in place and enforced. It would take at least 20 years before mitigation started to be effective and even then would not be able to screen development from the north for example, where the site is sloping.

Summary

- Development in this area would have a high landscape and visual impact which could not be fully mitigated due to its prominence on the skyline and the sloping nature of the site. Development would affect the setting of both the World Heritage Site and Cotswold Area of Outstanding Natural Beauty.

Historic Environment

Existing Conditions

- The Wansdyke (Scheduled Ancient Monument) Post-Roman linear earthwork lies just to the north of the area, which could therefore be argued to form part of its setting.
- Four Grade II Listed turnpike boundary posts also lie to the north of the area on the Fosse Way (A367).
- The area straddles a significant length of the Roman Fosse Way after it crosses the Wansdyke.
- Within 200m of the area is evidence of Bronze Age and Roman occupation along with a number of Roman coffin burials.
- Combe Hay Fuller's Earthworks (established about 1890 and closed in 1980) is in the centre of the appraisal area, though now a derelict group of industrial buildings.

Impacts

- Development of the area could potentially have a very damaging effect on any buried archaeological remains, including any Bronze Age and Roman occupation/burials along the Fosse Way.
- The Fuller's Earthworks buildings, though in a poor condition, could qualify for local listing as significant industrial buildings.
- There are serious concerns about the visibility of any development and its impact on the setting of the Wansdyke (Scheduled Ancient Monument).

Mitigation

- Whilst there is the potential to preserve archaeological sites within open spaces, this requires detailed knowledge of their actual location. The setting of the Wansdyke could be protected by careful planning at the northern end of the appraisal area. However, development will further urbanise this historic route/gateway into Bath where the Roman Fosse Way crosses the Wansdyke. The Fuller's Earthworks buildings could be considered for conversion into residential units, subject to detailed archaeological recording of the site.

Summary

- Any proposed mitigation will require knowledge of the exact location, extent, date and significance of past settlements/activity. This will require fieldwork to examine the area such as trial trenching and/or geophysical survey. More detailed desk-based assessment will also be needed to address the wider impact on the historic environment, in particular the setting of Scheduled Ancient Monument.

World Heritage

Existing Conditions

- The study area abuts the City of Bath World Heritage Site boundary and lies within the immediate setting of the World Heritage Site. The key characteristics and values of the World Heritage Site setting at this point are:
 - a rural approach to the city with a strongly defined urban edge (though the Park & Ride and Fuller's Earth Works site detract from this) that is largely hidden until arrival;
 - the city is still confined to the plateau ridgelines above Bath and does not extend down the slopes away from the ridgeline; the Fosse Way is an historic approach route to the city (dating back at least to Roman times and therefore associated closely with the Roman remains of the World Heritage Site);
 - Roman archaeological remains close to the study area (evidence for occupation and coffin burials) with potential for further remains in and around the study area (particularly in association with the Fosse Way);
 - long distance views away from the city over the surrounding countryside.

Impacts

- While there is scope to improve the environment and presentation of this gateway to the city (made untidy by the Park & Ride and Fuller's Earth Works site), this could be achieved without development. Also, an urban extension is no guarantee of achieving improvements and brings additional issues of concern.
- This site lies outside what is essentially a landscape pinchpoint at the entrance to the city and development here will create a largely separated settlement area, rather than a true urban extension. This would disrupt the well defined urban edge to the World Heritage Site, bringing the city out into the countryside surrounding the city.
- The city would become visible to a wide swathe of the surrounding countryside, revealing the city rather than maintaining Bath's character as a hidden city.
- This would be a negative impact on the integrity of the World Heritage Site and its setting, changing its visual and physical character to a detrimental degree.
- The likelihood for further Roman remains in this area is high and development in this area would potentially have a very damaging impact on any buried archaeology, which could have a detrimental impact on the outstanding universal values of the World Heritage Site.

Mitigation

- It would not be possible to mitigate the impact that development outside this landscape pinchpoint would have on the clearly defined edge between the city and its rural setting.
- In addition, the sloping nature of the northern side of the study area, and the long distance views to the area from the surrounding countryside, especially from the west, would be very difficult to mitigate, even with planting barriers. The urban form would still be visible and the rural setting and approach to the World Heritage Site will be urbanised.

- Whilst there is the potential to preserve archaeological sites within open spaces, this requires detailed knowledge of their actual location and nature. Full assessment of potential impact and mitigation options cannot be assessed until more is known about the remains.

Summary

- High impact on the setting of, approach to and edge of the World Heritage Site, significantly altering the character of the area and degrading the city's defined urban edge and abrupt change from urban to rural environment. It is not able to be mitigated due to the prominence and character of the development site and its awkward relationship to the edge of the city.

Nature Conservation

Existing Conditions

- This site is located within a Strategic Nature Area
- It is within the main feeding areas (sustenance areas) and flight corridors for Horseshoe bats associated with the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC).
- It is within 2km of the SAC and highly sensitive for nature conservation. English Nature Report no 174 states a management objective for feeding areas for Greater Horseshoe bats to "restrain creeping urbanisation into the 3-4km area around breeding sites by opposing building developments through planning procedures."
- Two ancient woodland sites (both SNCIs) lie in close proximity (<500m) to the north of the site. (The Forestry Commission should be consulted). The full interest of these woodlands is not known.
- The Fuller's Earth Works and South Stoke Complex SNCI lies immediately to the south of the area.

Impacts

- Development here would result in the direct loss of land from the SNA, reducing the areas strategic capacity for habitat restoration and enhancement.
- It would cause significant habitat fragmentation within an area of high ecological importance, with significant impacts upon foraging opportunities for Horseshoe Bats associated with the SAC. It would cause habitat deterioration to bat foraging areas and designated sites through impacts of lighting, noise and general disturbance.
- Development would impact upon a known Greater Horseshoe night roost. It is likely that the integrity of the SAC would be adversely affected. The ancient woodlands and designated sites adjacent to the site would suffer indirect impacts from urban fringe pressures (recreation; pets etc)

Mitigation

- The loss of land from the Strategic Nature Area (SNA) cannot be mitigated. Some degree of compensation could be achieved through off site habitat enhancement and long term management at an appropriate location and scale. This approach could help to reduce or compensate for other impacts. However the legal mechanisms are difficult and untested locally.
- It may be possible to reduce the effects of habitat fragmentation through the strategic provision of natural corridors within the development and through off-site works. This approach would require further surveys including radio tracking, and may reduce the site's housing capacity. However, the SNA would remain fragmented, and mitigation of impacts to the integrity of the SAC cannot be confirmed at this stage.
- An innovative approach to mitigation involving significant off-site works would be required. This is difficult and untested.

Transport & Highways

- Not assessed given environmental constraints and absence of land availability

Green Belt Purposes

- **CD9/E2** [Green Belt Review: Stage 1 \(Arup, April 2013\)](#)

Area and Description

- 0.7ha
- Edge of the Odd Down plateau

Housing Potential

- It would be reasonable to estimate that this site could deliver about 30 dwellings

Suitability

- This area has some potential for development without significant landscape and visual harm subject to retention of the important hedgerows and trees along the field boundaries enhanced with additional planting.
- The site forms part of SSCI 76/51 Rush Hill and Eastover Coppice but has not been surveyed since 1990 and so the condition may have changed.
- The site is likely to be suitable.

Land Availability

- The landowner has made a SHLAA submission

Housing Potential

- The housing potential of this area has not been assessed on account of it not being suitable for development. Further, there is no evidence of availability in this area.

Land Availability

- There is no evidence that any land in this area is available for development.

Landscape and Visual Impact Aspects

Existing Conditions

- The area is bounded by Whiteway Road to the north-east, the Newton Brook valley to the west, Haycombe Lane to the south and Haycombe cemetery to the east.
- The area is part of the Hinton Blewett and Newton St Loe Plateau Landscape Character Area comprising fairly steep west facing slopes articulated by a series of minor tributary valleys connecting to the Newton Brook. This is part of a wider attractive, high quality, rural landscape which has a complex landform of undulating plateau, ridges and valleys. Overall the landscape is open in character with many hidden valley features. It is an agricultural landscape with Haycombe Farm towards the southern part of the area in a patchwork of medium to large irregular fields, good hedges, tree groups and individual specimen trees.
- The site is at a prominent location on the side of the Newton Brook Valley. Views to Bath from the Newton Brook valley seen from the rural landscape to the south and west of the site are generally concealed by the higher ground occupied by Whiteway Road but at Twerton development does spill over the lip by 200-300 metres so that a narrow strip of housing is seen along the skyline softened in part by trees and hedgerows beside Whiteway Road.

Impacts

- Development would extend beyond the higher ground and Whiteway Road into the Newton Brook valley. This would radically change the tranquil rural character of this attractive landscape. Part of Twerton is widely visible from the rural landscape to the north west however development at this location would extend the intrusion of development over a much larger area to the west of Bath. In such a complex landscape there are numerous vistas from public viewpoints and roads. The visual impact of development on views would be severe from the vast majority of views with loss of the attractive, high quality rural landscape and loss of intricacy.

Mitigation

- The exposed location and distinctive landform would preclude effective mitigation. While it would be important to design the housing layout to respond positively to the landform and to provide trees individually, as tree belts and in small woodland groups as appropriate this would do little to make up for the high visibility of the development and its intrusion into the rural landscape. Any development would need to retain existing trees and hedges and incorporate them into the proposed open space and green infrastructure provision.

Summary

- Development would have a high landscape and visual impact from for example, the road at Clay's End and Clay's End Farm, Kelston Round Hill, Prospect Stile, Kelston Manor, Pennsylvania Farm and Whiteway, which would be difficult to mitigate due to the openness of the landscape and the prominence of the site on the side of the Newton Brook valley.

Historic Environment

Existing Conditions

- Newton St Loe and Englishcombe Conservation Areas lie to the north-west and south of the assessment area
- One Grade II Listed Buildings (Haycombe House GII listed) lies on the southern boundary of the assessment area.
- Two Scheduled Ancient Monuments (Culverhay Castle and the Wansdyke) lie to the south of the assessment area at Englishcombe.
- To the south-west of the assessment area there is evidence of a medieval mill and settlement near the Newton Brook, and a Roman coin from Haycombe Lane. Towards the centre of the assessment area there are medieval strip lynchets and Haycombe Farm.

Impact

- Development of the appraisal area could potentially have a very damaging effect on any buried archaeological remains, including the medieval and possible Roman occupation within the assessment area. There are serious concerns about the visibility and views of any development in this area and its impact on the setting of the the Listed Buildings, Conservation Areas and Scheduled Ancient Monuments at Englishcombe and Newton St Loe.

Mitigation

- Whilst there is the potential to preserve below ground archaeological sites within open spaces, this requires detailed knowledge of their actual location. It is questionable whether the settings of the World Heritage Site, Conservation Areas and Scheduled Ancient Monuments could be protected from development in this area.

World Heritage Site and Setting

Existing Conditions

- The area sits partly within the World Heritage Site boundary and partly within the immediate setting of the World Heritage Site. The key characteristics and values of the World Heritage Site and setting at this point are:
 - a strongly defined urban edge along the Whiteway Road, rarely crossed by development and changing in character immediately into a very rural and attractive landscape;
 - the city largely hidden when viewed from the west, with the exception of the overspill at Twerton which can be seen from the north-west and which is detrimental to the character of the World Heritage Site edge and setting.

Impacts

- Development in this area would extend the city by a significant degree out of the landscape hollow in which the World Heritage Site currently sits. The resulting overspill would reveal the city's edge to a much wider area of landscape, thus significantly changing the character of the edge and setting of the World Heritage Site through urbanisation. This would degrade the rural character of this part of the

World Heritage Site and its setting and would break with the current sharply defined urban edge – a key characteristic of the city at this point.

Mitigation

- It is hard to identify any effective mitigation to avoid the detrimental impact of urbanising this rural landscape, and extending the city further away from the landscape hollow within which it sits. The distinctive and complex landform in this area would make mitigation ineffective.

Summary

- Development in this area would have a significant detrimental impact on the character of the edge of the World Heritage Site and the setting which would be very difficult to mitigate due to the landform and prominence of the site.

Nature Conservation

Existing Conditions

- The area lies within 4km of the Bath and Bradford on Avon Bat SAC and the South West Corner of the area contains a corridor that is considered an important foraging route for Horseshoe bats associated with the SAC.
- Haycombe Lane SNCI runs North South through the site.
- Haycombe cemetery SNCI borders the site the east. Newton Brook SNCI lies just to the west
- Two notable species have been recorded within the development area – a scarce plant (status need clarification) and Fieldfare an RDB species.
- No other significant ecological features are known within the development area. (Further surveys should be undertaken before final allocation and capacity decisions are made)

Impacts

Development of this area has the potential to:

- Damage / destroy part of green infrastructure of importance to Horseshoe bats
- Have a direct impact upon Haycombe lane SNCI. This could result in the loss of good hedge habitat and species-rich verge.
- Have indirect impacts upon adjacent SNCIs through increased habitat disturbance and degradation through urban-edge and recreational pressures.
- Result in loss / displacement of 2 notable species (status needs verification)

Mitigation

These impacts could be off set and well mitigated in a well-planned and implemented scheme.

- The green infrastructure would need to be defined and protected
- Haycombe Lane would need to be retained, enhanced and protected.
- The adjacent SNCI would need adequate protection through the provision of adequate buffer areas and possibly off site management provision
- Key features identified / confirmed through further surveys within the site would need adequate protection and or compensatory provision

Summary

- The appraisal area should be subject to further survey prior to final site layout and capacity decisions. This should include the status of notable species recorded. The site has some ecological interest both within the appraisal area and adjacent to it. However, from existing knowledge, there would appear to

be good opportunities to achieve mitigation. This may require off-site habitat management and enhancement of adjacent SNCIs.

Transport & Highways

- Not assessed given environmental constraints and absence of land availability

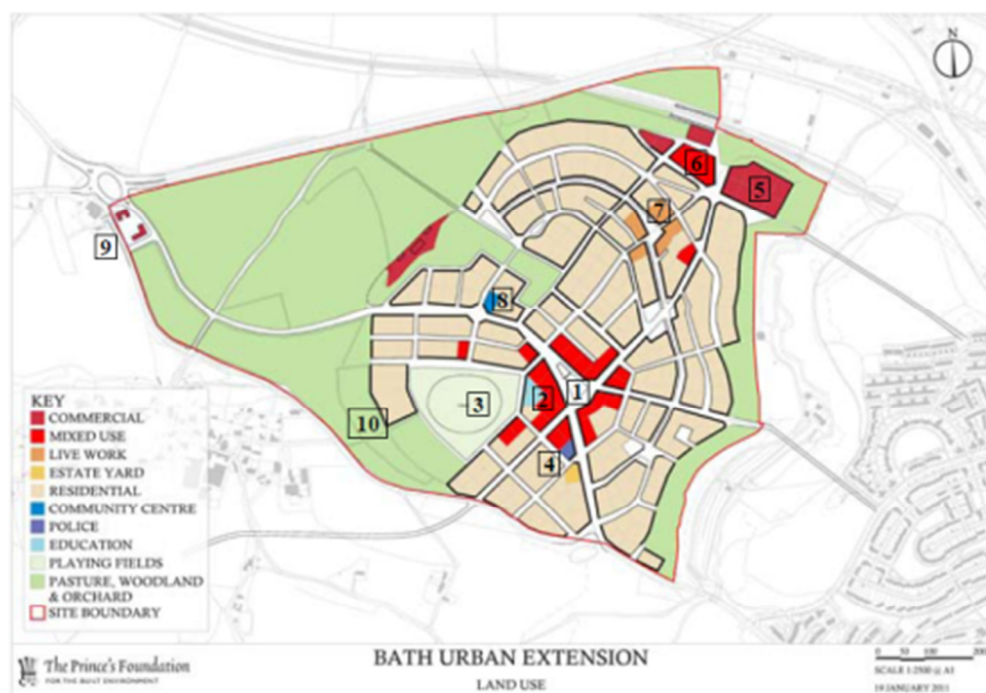
Green Belt Purposes

- **CD9/E2** [Green Belt Review: Stage 1 \(Arup, April 2013\)](#)

Housing Potential

- The Duchy of Cornwall have submitted an [illustrative development proposal for this area](#). The master plan for this proposal is thought capable of delivering 1,500-2,000 homes.

Duchy of Cornwall illustrative master plan and land use plan for West of Twerton



Landscape and Visual Impact Aspects

Existing Conditions

- This area is part of the Hinton Blewett and Newton St Loe Plateau Lands Character Area comprising gently sloping south east facing open plateau right on the edge of the river Avon valley which drops away sharply to the north west. It includes a high point towards its north western edge dropping very gently down towards the south east. The land use is grass fields with neatly clipped hedges. There is a prominent small copse just to the north of the area forming a local landmark especially as seen from the Avon Valley. The road between Newton St Loe and Rush Hill (Pennyquick) forms the southern boundary. The area is a skyline site with extensive views to and from the Cotswold Hills plateau to the north and east, the river Avon valley to the north west and east and the rolling countryside of the Hinton Blewett and Newton St. Loe Plateau lands to the south and west. Development would be visually prominent in these views.

Landscape impact

- Development would involve loss of the open rural character of the site and impacts on the wider character area of which it is part -a very rural character area with few settlements of any size. A large development here would lack landscape or historical / cultural context and appear as an estate dormitory development to Bath without physical or visual links

Visual impact

- The site is viewed from a number of rural lanes to the south, from the edge of Newton St Loe and from Twerton / Whiteway as well as the river Avon, A4 and Great Western Railway. These are local and middle distance views and the development would be very prominent both on the skyline and down the slopes to the road. Development would be visually incongruous being disconnected from both Bath and Newton St Loe. Lighting at night would be highly intrusive in the dark sky.
- From Kelston, the Kelston Road and across the Avon valley and various points on the Cotswold ridge in the AONB, the development would be prominent on the skyline and out of character with the currently very attractive rural view. Development would also be visually separated from Bath and without context and conspicuous in the night sky.

Mitigation

- Mitigation in the form of tree planting would be required to screen / soften any proposed development. Tree establishment on exposed sites can be difficult and would require persistent and effective tree management to be set in place and enforced. It would take at least 20 years before mitigation started to be effective. Planting would not be able to address the poor visual and physical linkage with Bath.

Summary

- Development would have a high landscape and visual impact which would be difficult to mitigate due to its prominence on the skyline and because of the openness of the landscape.

Historic Environment

- **Existing conditions**
 - Bath Conservation Area lies to the north-east of the appraisal area along the Newton Brook, and Newton St Loe Conservation Area to the west along Pennyquick.

- Three Grade II Listed Buildings lie on the boundary of the appraisal area – The Globe Inn, Newton Park Gate piers and the railway bridge on Stoney Lane.
- Newton Park (Registered Historic Park & Garden) lies to the north-west along Pennyquick.
- Within appraisal area there is evidence of Iron Age field systems, a Roman villa, cemetery and pottery, and the site of Newton Mill.
- The Great Western Railway forms the north-east boundary of the appraisal area.
- Kelston Park House (Grade II listed) with designated Capability Brown landscape has a strong relationship to the site.

Impacts

- Development of the area could potentially have a very damaging effect on any buried archaeological remains, including the known Iron Age and Roman occupation in the area. There are serious concerns about the visibility and views of any development in this area and its impact on the setting of Newton Park (Registered Historic Park & Garden) and the rural character of the Newton St Loe Conservation Area.
- The unique situation of Kelston Park House, by John Wood the younger, and its park, isolated on the bluff, is an important landmark from numerous views from within the Avon Valley itself. Kelston was designed as a country house with commanding views over the countryside. The view towards the south has always been across a green valley, the rural idyll. The list description of the historic park and garden states “the house was built on the lip of the southern scarp to exploit the views and the park is the last remaining open countryside between Bath and Bristol conurbations”. Development of the hillside towards Newton St Loe would be visible and would erode some of the sense of the house within the Countryside and would therefore have an adverse impact on the setting of the listed building.
- In effect Kelston Park and the Avon Valley act as a gateway to the City of Bath, a precursor to the handsome mansions (many by the same architect) in the city of Bath itself. This gateway function will be compromised if large areas of contemporary housing intrude into the views of Kelston Park and will compromise its setting as a consequence. The important transition from the rural to the urban and ones sense of arrival would be adversely affected.

Mitigation

- Whilst there is the potential to preserve archaeological sites within open spaces, this requires detailed knowledge of their actual location. It is questionable whether the settings of the Conservation Areas, Newton Historic Park & Garden and Kelston House, Park and Garden could be protected from any development in this area, given the high visibility of this historic route/gateway into Bath from the west along the Avon Valley (by river, road and railway).

Summary

- Any proposed mitigation will require knowledge of the exact location, extent, date and significance of past settlements/activity. This will require fieldwork to examine the area such as trial trenching and/or geophysical survey. More detailed desk-based assessment will also be needed to address the wider impact on the historic environment, in particular the impact on the settings of the Listed Buildings, Conservation Areas and Historic Park & Garden assets.

World Heritage Site and Setting

Existing Conditions

- 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.
- 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.
- 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.
- 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.

Impact

Landscape Setting

- 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 - - -*'
- 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

- 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.

- 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

- 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

- 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.

Nature Conservation

- The site is of limited ecological value and comprises mainly of agricultural fields with areas of ruderal habitat around field head-lands with hedgerow field boundaries recorded on an estate field plan of 1789.
- The principle finding of survey work undertaken by the Duchy of Cornwall is the presence of ten species of bat using the site, including the Lesser Horseshoe and Leisler's bats and (very rarely) the Greater Horseshoe, making the site of regional importance for bats. Woodland edges (particularly the northern /western side of seven acre wood) and hedgerows across the site are particularly important. However, no bat roosts were identified across the site. The development area lies within 4.4km of the Bath and Bathampton Down SAC.
- To the east of the site is Carr's Woodland SNCI and LNR and the Newton Brook SNCI.
- A geological SSSI lies to the north of the site and must be protected from any off site works.

Nature Conservation Impacts

- Scope for habitat fragmentation, and potential species loss within the site. Habitat disturbance and degradation of designated sites (Carr's Wood and Newton Brook), through urban fringe pressures. Potential habitat enhancements through provision of strategic open space if designed to include new woodland and woodland edge habitat and to link up existing woodlands.

Nature Conservation Mitigation

- Careful master planning needed for protection and enhancement of Carr's Wood and Newton Brook through expansion and development of LNR – to include new areas of woodland, woodland links, and improved habitat management.

Transport & Highways

- See Arup Transport Study

Green Belt Purposes

- See Green Belt review (Arup, 2013)