

# Emerging MoD Concept Statements

## Evidence base review Key points and recommendations

### MoD Ensleigh

#### Headline Issues

#### Landscape/visual issues

- **Addressing the WHS and AONB sensitivities associated with visible development on the upper valley slopes and skyline plateau areas, particularly associated with the small part of the site to the east and also a slightly lower degree, the plateaux edge west of the Lansdown Road;**
- **Conserving and /or enhancing the qualities of the Lansdown Road approach to Bath in line with the Cotswold AONB identified landscape sensitivities for the High Wold Dip Slope landscape.**
- **The treatment of the Lansdown Road frontage which adjoins the Bath Conservation Area and the Registered Park and Garden of Lansdown Cemetery.**
- **Conserving and enhancing the setting of the listed Ensleigh House and Beckford's Tower.**

#### Considerations for addressing headline Issues

- ▶▶ Enhance the Lansdown Road Frontage to conceal lower level activities from view. Reinstatement of dry stone boundary walls to reinforce this characteristic element of the plateaux landscape.
- ▶▶ A road access on the Lansdown road should be avoided and no changes made to the Lansdown Road alignment or integrity given its historic significance.
- ▶▶ Introduction of green area in front of Ensleigh House to respect its setting combined with a street defined vista to Beckford's Tower.
- ▶▶ Supplement existing trees belts off site with new mixed planting on the northern and north-eastern edges, of this site, to provide improved shelter for future living environment.
- ▶▶ Internal road alignments on the plateaux area should be straight and angular to mimic typical road and field boundary patterns on the plateaux.
- ▶▶ Remove all existing buildings from the eastern part of the site and reinstate this area as green space for informal and formal play provision.
- ▶▶ Suggest new single storey community building is located in the north-west corner.
- ▶▶ Reinstatement historic alignment of the Public Footpath running up to the eastern part of the site from the valley.

- ▶▶ An appropriate level of shelter to be provided on this plateau site for a new residential community on the northern and north-eastern edges, where they would also assist in mitigating footpath views from the adjacent AONB.
- ▶▶ Reinstate eastern part of the site to green space and incorporate new boundary shelter belts to improve the nature of existing views from Little Solsbury Hill to the city.
- ▶▶ Building frontages should be set back from and orientated toward the Lansdown Road, and should front onto the Granville Road and the playing field to the north.
- ▶▶ Two storey height limits along the frontage to the Lansdown Road to reduce and avoid the potential for visual intrusion.
- ▶▶ Off-site trees do not pose significant design constraint to future development.

### **Ecology**

- ▶▶ Site itself of low intrinsic wildlife value although includes a small garden area where Marsh Tit and Yellow Hammer have been recorded, both priority species and would need to be safeguarded within any scheme.
- ▶▶ Site just within the 5km sustenance zone of the Bath & Bradford on Avon Special Areas of Conservation (SAC) is not likely to be of significance to the SAC although recommend any proposals are informed by bat surveys
- ▶▶ unlikely other statutory nature conservation sites will be impacted by any future development so do not impose a constraint on the development
- ▶▶ three Sites of Nature Conservation Importance (SNCI) within 100m of the site, including Kingswood School Playing Fields SNCI immediately adjacent and to the north of the Site, providing opportunities to create habitat links though the site

### **Green Infrastructure**

- ▶▶ Opportunities for enhancement of the green infrastructure networks and wildlife corridors, including habitat connections, on the site through the planting of a linear tree planting belts along the eastern edge of the site and other well-planned corridors and public spaces.
- ▶▶ Well served by local public rights of way that link with the Cotswolds Way national footpath.
- ▶▶ Eastern boundary of the site may have the most potential for improved connectivity and new habitat, whilst also providing improved shelter and visual containment.

### **Sustainable construction**

- ▶▶ Suggest Code for Sustainable Homes (CSH) and BREEAM targets used to set baseline energy and sustainability standards for the site.
- ▶▶ Additional requirements set out in a 'Development Principles' document to capture other issues such as use of green roofs, prioritising passive solar design, setting minimum fabric performance requirements or minimum scores in sections of the CSH or BREEAM assessments.
- ▶▶ Set Code Level 4 (or equivalent) as a minimum standard should be technically and financially justifiable.

- ▶▶ Setting Code Level 5 and 6 targets (or equivalent) causes more significant cost uplifts to developers although allocating a proportion of the site to deliver a number of homes to these higher standards may not significantly affect land values, provide exemplar dwellings promoting higher standards and publicise/promote other initiatives (e.g. refurbishment/installation of renewables in existing buildings).
- ▶▶ Require BREEAM Very Good (or equivalent) rating should be technically and financially viable and more practical for buildings over 1000sqm (requiring Excellent rate would have a more significant cost uplift).
- ▶▶ Potentially significant 'allowable solutions' funds (proposed as part of the Zero Carbon policy) could be released by the sites if they are developed after 2016 (Ensleigh £500k) potentially to help deliver CO2 emissions reductions elsewhere through energy efficiency refurbishment measures, development of DH networks, installation of renewables etc.
- ▶▶ Ensleigh site is likely to rely upon fabric, energy efficiency and low and zero carbon technologies to meet the standards set out above. This will place more emphasis on incorporating passive solar design measures into the Masterplan and dwellings.

#### **Archaeology**

- ▶▶ Possibility of early medieval finds on the site and work should proceed under archaeological supervision.
- ▶▶ Probable that the demolition of the present structures would improve the general setting of Ensleigh House (mid-19th century Italianate villa).
- ▶▶ Any development will impact on the settings of the Beckford's Tower and Lansdown Cemetery and then listed walls of the park and the mortuary chapel, both well screened by mature trees and sympathetic designs will be an improvement.
- ▶▶ Development should not affect the woodland Medieval woodland at Sopers wood but care should be taken that the development process does not harm the wood.

#### **Transport**

##### **Highways**

- ▶▶ Primary access should be by means of a new roundabout junction sited where the secondary gated access to the MOD site is now.
- ▶▶ Secondary vehicular access onto Granville Road with inter-connecting loop road connection.
- ▶▶ potential improvements to the Lansdown Road/Richmond Road junction because of increased traffic.
- ▶▶ Preparation of a Traffic Regulation Order to restrict vehicular use of Colliers Lane as may be deemed necessary by the Council.

##### **Public Transport**

- ▶▶ Service 2 to be re-routed via the main site loop road.
- ▶▶ Service support should be sought to provide a more extensive evening service.

### **Walking/Cycling**

- ▶▶ No specific improvements to pedestrian/cycle routes identified.
- ▶▶ improvements should be directed towards crossing improvements on Lansdown.
- ▶▶ Upgrading the existing refuge just south of Fonthill Hill (by Kingswood School) should be considered as part of these crossing improvement measures.

### **Playing fields beyond the site**

#### **Landscape/visual issues**

- ▶▶ Square playing field to the north sufficiently contained by mature trees and well related to the remaining site to have significant potential in landscape and visual terms to accommodate future development.
- ▶▶ Mitigate potential impact on setting of the AONB, the amenities of the Green Belt, on Beckford's Tower and on the OUV of the Bath WHS by further strengthening of the existing mature tree belts on field edges.
- ▶▶ Kingswood School Playing Field landscape is more open and in its current state has enough containment to accommodate development without it having significant adverse effects on the City approach on Lansdown Road and OUV.
- ▶▶ Viewpoints potentially affected by an expansion of development further to the west include sequential views from the Lansdown Road approach to the city, views from the Lansdown Battlefield, Views from the A46 Approach to the city.
- ▶▶ Impact on OUV of the WHS site could be mitigated in the long term, through the planting of advanced mixed shelterbelts.

#### **Ecology**

- ▶▶ Kingswood School Playing Field designated partially for unimproved calcareous grassland - heavily managed playing field but recommend survey at an appropriate time of year to determine its botanical interest.
- ▶▶ boundaries contain habitat of greater potential for reptile species and recommend a reptile survey of the site is undertaken to inform proposals.
- ▶▶ Recommend extended Phase 1 survey of the entire area which would identify habitats and the potential for protected species.

#### **Trees**

- ▶▶ Three main groupings (aggregation of verge and other trees along the Lansdown Road frontage and the two mature shelter belts planting) would all be material consideration to design and layout of future design.
- ▶▶ Remaining scattered individual trees and groups should be retained within any future development design.
- ▶▶ should look to enhance the tree cover on the site overall.

## MoD Warminster Road

### Headlines

#### Landscape/visual issues

- **Conserving and enhancing the Outstanding Universal Value.**
- **Robustly demonstrating how the proposals will conserve and enhance the Bath Conservation Area and consider any impact on the settings of the Grade 2 listed Hampton Lodge and Grade 1 listed Grosvenor Place to the east and north respectively.**
- **The setting of Hazelwood Lodge, although not listed, and setting of the listed Sydney House, in particular, the avenue leading to it, in the south-west corner of the site, will also require consideration.**
- **Any landscape proposals for the site will need to be responsive to the positive characteristics of the Bathwick landscape character area and the identified site landscape and historic assets.**

### Considerations for addressing headline Issues

- ▶ Any proposals for the site in landscape terms need to be responsive to the positive characteristics of the Bathwick landscape character area and the identified site landscape and historic assets.
- ▶ Retain scattered tree groups on the southern edge of the site and the associated area of open space to safeguard potential view to Little Solsbury Hill from the south-west corner, from the Warminster Road and maintain views over the site to the city and the positive green frontage to this approach to the city.
- ▶ Conserve and enhance the open meadow to north and east of the site to safeguard positive views through this area and back towards it from Georgian buildings and recreational routes.
- ▶ Remove the two existing buildings on the southern and the most elevated south-eastern corner of the site and restore to open space.
- ▶ Development should have overriding pattern of buildings orientated with their long axis following the contours of the site.
- ▶ Remove and replace existing conifer belt in the south-east corner of site.
- ▶ Improve treatment of the northern and eastern boundary edges.
- ▶ Create two new pedestrian access routes through the development at the top and bottom of the site, linking east to west along the contours to provide linkage to the school, local centre and connect to the canal tow path and beyond
- ▶ Create new road ways on the areas with most shallow gradients and locating other roads perpendicular along the line of the contours.
- ▶ Suggest site vehicular access point is moved away from the south-west corner of the site further east to avoid the area at the end of the Sydney House avenue and instead could be used as a pedestrian/cyclist only entrance.

- ▶▶ Development blocks should be orientated to front onto the public right of way running along the south-west boundary.
- ▶▶ Retain existing tree planting both on and off-site on the site edges and plant large trees to strengthen the tree planting cover afforded to the site, when viewed from Alexandra Park, Camden Crescent and Little Solsbury Hill.

#### **Visual Considerations**

- ▶▶ removal of building in the south-east corner on the elevated terrace, the tall ancillary building in the green space on the south of the site and the two storey grey metal clad building group.
- ▶▶ Maximum of two storey dwellings, with taller buildings concentrated in a set-back location on the lower slopes of the site.
- ▶▶ Lighting measures will need to be strictly controlled throughout the site to avoid sky glow and spillage.

#### **Trees**

- ▶▶ Tree cover on site is generally good, with a predominance of early mature amenity specimens and off-site trees do not pose a significant design constraint to potential future development of the site.

#### **Ecology**

- ▶▶ Very sensitive location adjacent to a number of Sites of Nature Conservation Importance, including the River Avon and Kennet & Avon Canal, and to other valued habitats.
- ▶▶ Site includes part of a large SNCI (Hampton Row) with the Kennet and Avon Canal SNCI adjacent to the site boundary but impose limited constraints.
- ▶▶ Negligible loss of bat foraging and/or commuting habitats so no constraint imposed.
- ▶▶ Recommended that a lighting strategy devised to avoid negative effects associated with increased lighting levels on any bats using the site
- ▶▶ Challenge would be to provide balanced access to protected wildlife habitats, making to links to existing robust habitats, to safeguard vulnerable habitats, and also providing on site assets that are robust and valued, and which contribute to the wider natural environment.

#### **Green Infrastructure**

- ▶▶ Great potential to be an exemplar site for planning new development with well integrated green infrastructure as well located in close proximity to a range of existing recreational corridors, including national cycleway, green cycling and walking routes to the City centre, and local school.
- ▶▶ Site includes land designated as a Site of Nature Conservation Importance, which, subject to adequate habitat protection, provides opportunities for high quality public open space and very close to a Local Nature Reserve.
- ▶▶ Scope for any scheme to contribute to the enhancement and restoration of habitat connectivity.
- ▶▶ Opportunities could be maximised by an additional offsite river (canal?) crossing and footpath/ cycle path connection to link with the existing rail footbridge.

## Sustainable construction

- ▶▶ Suggest Code for Sustainable Homes (CSH) and BREEAM targets used to set baseline energy and sustainability standards for the site.
- ▶▶ Additional requirements set out in a 'Development Principles' document to capture other issues such as use of green roofs, prioritising passive solar design, setting minimum fabric performance requirements or minimum scores in sections of the CSH or BREEAM assessments.
- ▶▶ Set Code Level 4 (or equivalent) as a minimum standard should be technically and financially justifiable.
- ▶▶ Setting Code Level 5 and 6 targets (or equivalent) causes more significant cost uplifts to developers although allocating a proportion of the site to deliver a number of homes to these higher standards may not significantly affect land values, provide exemplar dwellings promoting higher standards and publicise/promote other initiatives (e.g. refurbishment/installation of renewables in existing buildings).
- ▶▶ Require BREEAM Very Good (or equivalent) rating should be technically and financially viable and more practical for buildings over 1000sqm (requiring Excellent rate would have a more significant cost uplift).
- ▶▶ Potentially significant 'allowable solutions' funds (proposed as part of the Zero Carbon policy) could be released by the sites if they are developed after 2016 (Warminster Road £160k) potentially to help deliver CO2 emissions reductions elsewhere through energy efficiency refurbishment measures, development of DH networks, installation of renewables etc.
- ▶▶ Warminster Road site is close to one of the clusters highlighted in the bath district heating project but delivery of this would rely upon partnership with and/or leadership from other parties including a private hotel owner and the Council.

## Archaeology

- ▶▶ Canal should be considered as an industrial heritage asset in its own right.
- ▶▶ Opportunity for the swing bridge (noted on the 1950 OS map) crossing the canal at the northern corner of the development site, linked to the public footpath to be restored to provide pedestrian access to the London Road. (*Note: check whether needs bridge needs restoration*)

## Transport

### Highways

- ▶▶ Primary access should be by means of a new roundabout junction with Warminster Road just east of the existing exit point from the site would assist in providing a speed reducing feature current 85<sup>th</sup> percentile speeds are well above 30 mph.
- ▶▶ Existing entrance to the site by the St Christopher's Road junction should be designed to provide a second emergency means of vehicular access to the site but would normally function as a pedestrian/cycle link with demountable bollards or other means used to prevent normal vehicle use.
- ▶▶ Installation of two pedestrian refuge islands on Warminster Road to assist pedestrians crossing to the canal access path from Minster Way (along eastern boundary of site) and assist pedestrians crossing where the existing

footpath from St Christopher's Close joins Warminster Road by The Maples.

**Public Transport**

- ▶▶ *Awaiting information*

**Walking/Cycling**

- ▶▶ New pedestrian/cycle linkage with a new bridge connecting to the Kennet and Avon Canal Towpath.
- ▶▶ Provision of a pedestrian linkage to the adjacent primary school.
- ▶▶ Possible improvements to the footway on the north/west side of Sydney Place/Sydney Road to facilitate shared use.



### Headlines

#### Landscape/visual issues

- **Conserving and enhancing the Outstanding Universal Value.**
- **Robustly demonstrate how the proposals will conserve and enhance the adjacent Area of Outstanding Natural Beauty to the north and the Bath Conservation Area to the south.**
- **Need for landscape proposals to be responsive to the positive characteristics of the Foxhill landscape character area and the identified site landscape and historic assets.**
- **Consideration of the interrelationship between the Georgian City and the high value valley landscape bordering the plateaux to the north.**
- **Reinstatement of Georgian and earlier historic assets including part of the former Ralph Allen carriage drive network and improving the settings of Hangingsland Lane to the east and Greendown Terrace to the south.**
- **Sensitive treatment to the southern entrance given that it is within the Bath Conservation Area, it is in the setting of listed buildings opposite and is located alongside an historic route.**

### Considerations for addressing headline Issues

- ▶▶ Key landscape feature/issue on this site is the protection and enhancement of the green wooded and undeveloped skyline on the northern and north-eastern edge of the site.
- ▶▶ Set back development further from the edge of the plateau than currently found to enable a wider band of open green space to be maintained along these edges.
- ▶▶ Widen the greenway along the north and eastern boundaries to enable some views out from the former Ralph Allen estate carriage drive from the plateaux edge without exposing new buildings to view.
- ▶▶ Incorporating new planting along the plateaux edge is of increased significance in maintaining the green and tree covered appearance.
- ▶▶ restrict building height along the northern edge of the site to single storey or set back new two storey buildings far enough so that they maintain the current undeveloped appearance of this part of the southern skyline.
- ▶▶ Reinstate the Ralph Allen carriage drive as the principal green space and maintain connections with the wider historic network of green spaces including Hanginglands Lane (Pope's Walk) to the east and the green space through to Axbridge Road to the west.
- ▶▶ Retain distant views out to the north-west from the Backstones Playing Field, the southern entrance to the site and along Foxhill Lane.
- ▶▶ The historic assemblage of listed quarry cottages opposite the site entrance associated with the Stone mining and Quarrying history of Combe Down in the 18<sup>th</sup> and 19<sup>th</sup> Centuries so any new building or access proposals on the

Bradford frontage should be very sensitively handled and new buildings do not try to dominate this road frontage.

- ▶▶ Conserve and repair stone walls where they are historically important boundary features, declining, alongside routeways, or forming frontages.
- ▶▶ Incorporate and integrate the Hanginglands Lane to the east into the movement network and green infrastructure framework for the site.
- ▶▶ Remove existing two storey entrance building and boundary fencing that detract and to the reinstatement of an open green.
- ▶▶ Set back new buildings so that as far as possible from the plateaux edge, the landform alone conceals them from historic viewlines.
- ▶▶ Building heights away from the northern plateau edge should generally reflect the recommendations of the Bath Building Heights Strategy for and be no more than two storeys.
- ▶▶ Reinststate access and views over the city from the former Ralph Allen's 18<sup>th</sup> Century Estate Carriage Drive, on the edge of the plateaux.
- ▶▶ Orientate new building frontages toward existing building frontages that face the site on the south-eastern and western boundaries and along the Hanginglands Lane (Pope's Walk) and frontages should also face the greenway corridor incorporating a restored Ralph Allen Carriage Drive on the northern edge of the site.

#### **Trees**

- ▶▶ Overall, the tree cover on the site is of good quality, though the better quality trees tend to be situated close to site boundaries.
- ▶▶ Off-site trees do not pose a significant design constraint to potential future development.
- ▶▶ Consideration to careful design of intended future land use areas along the northern edge of the site to reduce potential conflict with the presence of the maturing woodland blocks and the desire for light and views by future occupants/ users.
- ▶▶ Partially mitigated by the presence in this area of a strip of on-site amenity trees of reasonable form and maintenance of a buffer between built form and the adjacent woodland.
- ▶▶ Below ground constraints may have bearing on the location of future development with respect to off-site trees as likely that some rooting into site has taken place in the period of the site's occupancy by the MOD.

#### **Ecology**

- ▶▶ Site close (<0.5km) to key components of the Bath & Bradford on Avon SAC sitting within important Greater Horseshoe bat foraging corridors.
- ▶▶ Important habitat corridor along the northern boundary.
- ▶▶ Consideration should be given to enhancing habitat for bats species and feeding habitat.
- ▶▶ Designated wildlife sites to the north and south of the site.
- ▶▶ Statutory nature conservation sites unlikely to be impacted any future development of the site and should not impose a constraint on the

development provided best practice pollution controls are employed.

- ▶▶ Other than potential bat interests the site appears to be of low intrinsic nature conservation value, but provides opportunities to create new habitat links between designated sites through enhancement of the site.
- ▶▶ Northern boundary of the site would need to be treated sensitively, and detailed assessment of the sites bat interests would be needed.

### **Green Infrastructure**

- ▶▶ Close proximity to important green infrastructure assets, including the emerging Two Tunnels National Cycleway and the Limestone Link, providing walking and cycling opportunities into the countryside or into the City.
- ▶▶ Consideration should be given to the enhancement of the green infrastructure networks and wildlife corridors on the site, through the planting of linear tree planting belts, conservation of grassland habitat and through the planting of nectar producing food plants for Bats.
- ▶▶ May be opportunities to contribute to the surrounding Bat Foraging corridors of importance the SAC through provision of green roofs and new habitat links.
- ▶▶ Multi-functional green infrastructure corridors would assist in enhancing habitat connectivity and would create a positive interface with adjoining development and a north–south natural habitat link across site would be key.
- ▶▶ Bolstering of the wooded corridor to the north of the site could link with footpaths through to Rainbow Woods.
- ▶▶ Existing public spaces and sports pitches adjacent to the site could be enhanced to benefit the existing and new communities within a well-integrated scheme.

### **Sustainable construction**

- ▶▶ Suggest Code for Sustainable Homes (CSH) and BREEAM targets used to set baseline energy and sustainability standards for the site.
- ▶▶ Additional requirements set out in a ‘Development Principles’ document to capture other issues such as use of green roofs, prioritising passive solar design, setting minimum fabric performance requirements or minimum scores in sections of the CSH or BREEAM assessments.
- ▶▶ Set Code Level 4 (or equivalent) as a minimum standard should be technically and financially justifiable.
- ▶▶ Setting Code Level 5 and 6 targets (or equivalent) causes more significant cost uplifts to developers although allocating a proportion of the site to deliver a number of homes to these higher standards may not significantly affect land values, provide exemplar dwellings promoting higher standards and publicise/promote other initiatives (e.g. refurbishment/installation of renewables in existing buildings).
- ▶▶ Require BREEAM Very Good (or equivalent) rating should be technically and financially viable and more practical for buildings over 1000sqm (requiring Excellent rate would have a more significant cost uplift).
- ▶▶ Potentially significant ‘allowable solutions’ funds (proposed as part of the

Zero Carbon policy) could be released by the sites if they are developed after 2016 (Foxhill £900k) potentially to help deliver CO2 emissions reductions elsewhere through energy efficiency refurbishment measures, development of DH networks, installation of renewables etc.

- ▶▶ Foxhill site could have the potential to include a site-wide heating network but the viability of this will depend upon the heat demands and heat density of the eventual development.
- ▶▶ The viability could be improved by increasing the density of the development (70dph+), a typology that includes more flats and terraced housing and increasing the proportion of non-domestic uses.

## **Archaeology**

- ▶▶ Number of post-medieval field boundaries can be identified on aerial photographs predating the MOD establishment
- ▶▶ Multiple Boundary Stones are shown on the 1902 map within the site but not known if any survived.
- ▶▶ The Old Foxhill farmhouse is shown on tithe maps dating back to 1830 the western entrance to the MOD site but not known how much of the farm building survives.
- ▶▶ Evidence of Roman occupation discovered building of the Foxgrove estate within 100m of the north-western edge of the site yielding rich pottery and domestic remains and as not known if this occupation zone extends into the MOD land, so evaluation would be necessary.

## **Transport**

### **Highways**

- ▶▶ Primary access should be achieved via a new mini-roundabout junction with Bradford Road.
- ▶▶ Secondary vehicular access point onto Fox Hill.
- ▶▶ Improvements to the Bradford Road/Fox Hill Road junction (mini-roundabout preferred) would act as an additional speed reducing feature.
- ▶▶ Need for improvement to the North Road/Ralph Allen Drive junction.
- ▶▶ Midford Road (S) approach to the double mini-roundabout is overcapacity but not shown as being worsened with the re-development scenarios.
- ▶▶ A3062 Frome Road (N) approach to the roundabout junction with the A367 Wellsway is worsened in the PM peak period with both re-development scenarios.

### **Public Transport**

- ▶▶ Financial support for extending Service 13 route would be sought for a five year period.
- ▶▶ Existing turning loop for Service 1 needs to be accommodated within the site close to the Bradford Road access but not intended that this service is extended further to penetrate the site.

### **Walking/Cycling**

- ▶▶ Pedestrian severance issues on Bradford Road would be addressed by the

traffic calming measures sought.

- ▶▶ Signing/lighting improvements needed to existing linkage between Fox Hill and Perrymead.
- ▶▶ Pedestrian footpath connection in the SE corner and in the NE corner close to the short footpath to provide linkage from Popes Walk into Priory Close.
- ▶▶ Contribution to be sought to the proposed cycle link between North Road and Claverton Down Road.