

Landscape and World Heritage Study of the Potential for an Urban Extension to the South / South West of Bath

1. Background

This Study has been carried out in response to the October 21st Draft of the Regional Spatial Strategy from the Regional Assembly which states:

'A sustainable urban extension should be considered south of Bath, subject to the need to address environmental and landscape constraints, its World Heritage Site status and transport implications, in the context of the Green Belt review.'

Through the First Detailed Proposals for a sub-regional spatial strategy agreed by the West of England Partnership and submitted to the Regional Assembly, the Council proposes to make provision for 15,400 dwellings in the Bath & North East Somerset district between 2006 and 2026. This sub-regional strategy will form part of the Regional Spatial Strategy for the South West. The emerging strategy suggests that housing should as a first priority be accommodated within the main urban areas and then in urban extensions. It is clear that the dwellings required in Bath & North East Somerset can not all be accommodated within Bath and therefore, urban extensions need to be considered. This study assesses the landscape and World Heritage capacity for an urban extension to Bath to accommodate some of the strategic housing requirement.

Most of Bath is tightly surrounded by the Cotswolds Area of Outstanding Natural Beauty. PPS7 makes it clear that major development should only be considered within an AONB in exceptional circumstances; including where it addresses issues of national significance and where the cost and scope for development outside the designated area or addressing the need in some other way is prohibitive. Therefore, this study does not assess areas within the AONB and only addresses areas to the south and south west of the city outside the AONB. In order to accommodate the scale of development potentially required a band of countryside extending about 1.5km from the urban edge has been assessed. This would enable an assessment of the potential for areas of development at a strategic scale.

A separate ecological assessment (Appendix 5) was carried out for the 1.5km band and should be read in conjunction with this report. It should be noted that Plan 1, which shows the outcome of this assessment in terms of capacity for development, represents capacity in terms of landscape and World Heritage only. The ecological constraints submitted as part of this study will influence the overall capacity for development.

2. The City of Bath and its Setting

The World Heritage Site Nomination Papers (1986) describe Bath as a city set within a hollow in the hills. The resulting compact nature of the city is a key aspect of its character and an important influence on its wider landscape setting. The following describes how the constraints of landform have been an important influence on the development of Bath.

As with the development of any city there are many factors which have influenced the spread of the city of Bath, however one important underlying factor is landform. The city grew up where the River Avon and its tributary streams cut through the Cotswold ridge at

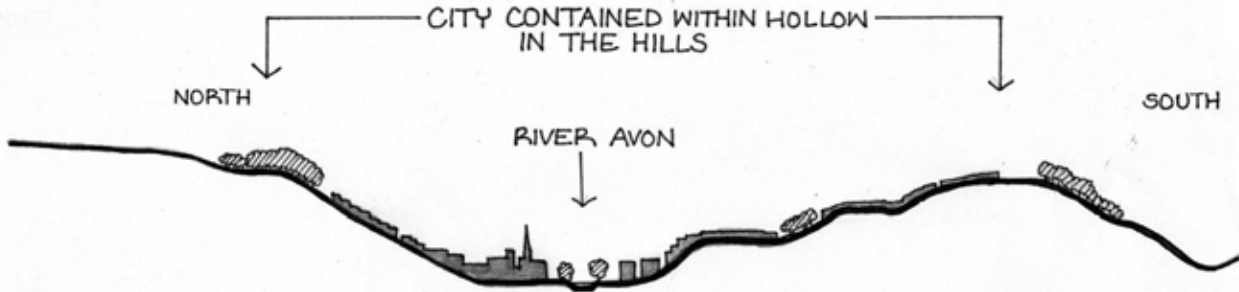
its southerly tip creating a natural hollow in the hills. Over the centuries this has provided natural containment, with the city growing firstly over the flat flood plain and then gradually up the more accessible valley sides. Since Georgian times there has been an enduring recognition of the importance of the relationship between the built environment of the city and its natural landscape setting. The planning legislation of the mid / late twentieth century, in particular the development of Green Belt and AONB policies has served to reinforce this.

To the south of the river the plateau of the Cotswold Hills is generally lower and more indented by tributary valleys than to the north. Hence development has spread up the Avon valley slope itself, along the more accessible tributary valleys and onto some of the areas of plateau. Its spread finally being contained by the steep south and east facing slopes of the Rivers Cam and Avon and by the west facing slopes of the Newton Brook Valley system.

To the north of the River Avon the landform is less complex, with fewer tributary valleys cutting into the higher Cotswold plateau. Development has spread up the River Avon valley sides and along the more accessible tributary valleys, principally at Weston. The high plateau is further from the centre of the city and hence very little development has taken place there (the MoD at Lansdown and Lansdown Park).

The result today is a highly compact city with a clearly defined urban edge which can be seen both from within and without as having a natural limit to spread as defined by the landform and landscape character of its surroundings, whether it be steep slopes or flood plain. Indeed in the few places where the city has spread a little beyond this natural containment as with the spread of Twerton onto the south west facing slopes of the Newton Brook valley system, the negative visual impact and incongruity in the landscape stands out as an example of the damage to the character of the World Heritage Site and its landscape setting.

The illustrative sketch section north-south through the city as shown below gives a diagrammatic illustration of how the city is contained by landform.



Illustrative North-South Section through City of Bath

3. Policy Context to the Assessment

The study area is subject to numerous local, regional and national policies and guidance. The main policies are listed in Appendix 2 and include the Local Plan, Joint Replacement Structure Plan, PPG 15 and 16, and RPG 10. These policies in particular recognise the significance and sensitivity of the built and natural environment in and around the city of Bath, and the importance of taking environmental sensitivities into account when considering the need to accommodate economic and physical growth.

4. Methodology and Definitions

Underpinning the methodology is an understanding of landscape character and in particular the published *Rural Landscapes of Bath and North East Somerset – A Landscape Character Assessment (2003)* adopted as SPG by Bath & North East Somerset Council.

The method for assessing what impact development within the area immediately surrounding Bath would have on the World Heritage Site has been developed in accordance with guidance on the definition of buffer zones given in UNESCO's *Operational Guidelines for the Implementation of the World Heritage Convention (2005)* and ICOMOS-UK's *Guidelines for the definition of boundaries for candidate World Heritage Sites (2001)*.

The *Operational Guidelines* state that a buffer zone is an area surrounding a World Heritage Site which has complementary restrictions placed on its use and development to give an added layer of protection to the Site. The *Guidelines* require that buffer zones are put in place where necessary for the proper conservation of the Site. According to the *Guidelines*, buffer zones should include:

- the immediate setting of the World Heritage Site;
- important views; and
- other areas or attributes that are functionally important as a support to the site and its protection.

The City of Bath World Heritage Site does not currently have a buffer zone and an assessment of whether a buffer zone is required has not yet been carried out. In lieu of this work, this study has included, within the wider landscape setting criteria, an assessment of the impact of development in the study area on the three concerns listed above, in addition to an assessment of the impact of development on the character of the Site itself.

Four criteria were assessed in relationship to potential development:

1. The impact of development on landscape character in particular sense of place, character area as a whole and quality of landscape.
2. The impact of development on visual effects in particular views from within and without the area being assessed, impact on skylines and approaches, overall conspicuousness of development.

3. The impact of development on the World Heritage Site in particular the impact on:

(i) The character of the World Heritage Site

The World Heritage Site is the entire city of Bath. Assessments of impact on its character need to address the Site as a whole with its harmonious combination of built form and green space, as well as individual areas or buildings. Bath is a compact and visually harmonious city that has remained largely contained within its landscape hollow, with largely green ridgelines, and the city rarely visible from the surrounding countryside.

(ii) The wider setting of the World Heritage Site

The wider setting of the World Heritage Site is the rural landscape that surrounds it. To the north of the River Avon this is the upper part of the steeply sloping valley sides as well as the gently rising plateau top beyond. To the south of the city, where the Cotswold ridge is gradually reducing in height and extent, the landscape setting is more varied as the Cotswolds give way to different landscape character areas such as the dramatic Limpley Stoke Valley to the east, the Cam Valley to the south and the Hinton Blewett and Newton St Loe Plateau Lands to the west.

4. The potential for mitigation of possible development

A survey form was developed to enable the above aspects to be assessed on an area by area basis. Assessment areas were selected firstly by plotting the designated rural landscape character areas (as defined in the SPG - *Rural Landscapes of Bath and North East Somerset, A Landscape Character Assessment 2003*) on a map and dividing them where appropriate into more detailed and visually distinctive sub-character areas. Each area was driven and walked through and around before selecting a representative viewpoint from which to complete the assessment form. This enabled a well-rounded assessment to be made. A photographic record was made, including photographs taken (where weather permitted) into the areas from the wider countryside. Each coherent area was scored on a 3-point scale for landscape character, visual aspects, WHS and potential for mitigation as follows:

1. Low effect – i.e. little impact on landscape character / little impact on views, inconspicuous / little or no impact on historical or environmental assets / little impact on WHS criteria. Appropriate mitigation will be effective resulting in a low residual impact.

2. Moderate effect – i.e. moderate impact on landscape character etc. Appropriate mitigation will be reasonably effective resulting in a moderate residual impact.

3. High effect – i.e. high impact on landscape character etc. Mitigation will not be effective, resulting in high residual impact.

A sample form is attached in Appendix 4.

For each sub-character area surveyed the four scores were amalgamated to give a development capacity score, again on a 3-point scale of:

1. High capacity to 'absorb' development with appropriate mitigation
2. Moderate capacity to 'absorb' development with appropriate mitigation
3. Low capacity to 'absorb' development. Mitigation would not have a significant effect in reducing the impact of development on landscape character and views.

The results are plotted on Plan 1 which also shows each numbered "capacity area" for which a survey form was completed. A supporting plan (Plan 2) showing the photographic viewpoints is also included with a comprehensive list of photographs taken itemised in Appendix 3. It should be noted that selected photographs only have been included in the text to illustrate the areas assessed.



Photograph 2

Shows Newbridge Bridge as the Gateway to the west of the city as well as the contained character of this part of the city



Photograph 6



Photograph 54

Photographs 6 and 54 show development that has spilt out onto slopes forming the rural setting to Bath



Photograph 65

Photograph shows development that has spilt out onto slopes forming the rural setting to Bath



Photograph 29

Photograph to show glimpsed development which does not spill down the rural slopes / setting to Bath

5. Results of the Assessment

Individual surveyed areas are described in detail in Appendix 1 and should be read in conjunction with Plan 1. The following is a summary of the findings.

The plan clearly shows that the vast majority of the area surveyed has low capacity for development. There is just one tiny area of plateau, Area 1C which has a moderate capacity for development. However, the number of dwellings which could be accommodated would by no means be strategic in nature.

The areas with low capacity for development are described below in a little more detail and in relation to their Rural Landscape Character Area designations as follows:

Avon Valley (areas designated 1 on Plan 1)

Area 1A is most representative of this character area, being the wide, open valley of the River Avon with moderate to steeply sloping sides. This is a linear, simple landscape of medium to large fields bounded by hedgerows; lines of trees mark the river and disused railway in the valley bottom and copses of trees and tree belts are scattered on the valley sides. The valley side to the north is within the AONB and falls outside the area of search. This valley is the major transport corridor linking Bristol with Bath and as such contains two "A" roads and the mainline railway as well as the disused railway line which is now

the Bristol-Bath Railway Path. Whilst all these features are strong linear components in the valley they do not spoil the overall attractiveness of the valley. There is significant Roman activity noted in the Sites and Monuments Record (SMR) both on the valley floor and southern sides. Marking the junction between open countryside and the beginnings of the city is the listed Newbridge Bridge (c1750) over the Avon. This is an attractive gateway into Bath with a very strong break between open countryside and the city marked by the attractive old stone bridge with its elegant arch set on a bend in the river. The change in character is emphasised by a change in direction and narrowing of the valley and a strong backdrop of trees right across the valley with the city glimpsed beyond. Driving into the city on the Newbridge Road, the bridge itself is understated but seen from Kelston Park and the Cotswold ridge, the view is beautiful with the bridge a strong landscape feature. In the revised deposit Local Plan there is an allocation for a Park and Ride and Civic Amenity Site close to Newbridge Bridge. The Local Plan inspector's report recommends that part of the site (excluding land south of the A36) be allocated just as a Park and Ride. The council will need to consider the inspector's recommendations and it is anticipated that this will take place in the autumn 2006. In order to maintain the existing attractive gateway high quality mitigation with extensive tree planting will be a pre-requisite.

Any development to the west of the bridge would impinge into the open countryside described above; would destroy the important gateway; would cause a fundamental change to the nature of the character of the World Heritage Site as a "city contained within a hollow in the hills" (WHS Nomination Papers) and would potentially compromise Roman sites which support the values of the WHS.

Area 1B is a small, hidden tributary valley of the River Avon, very well treed and a highly attractive landscape. It is currently in part a well designed caravan park with good public access that could not accommodate development without severe detriment to its character and visual amenity.

Area 1D is a small plateau area, it is highly visually sensitive and could not accommodate any development.

Hinton Blewett and Newton St Loe Plateau Lands (Areas designated 2 on Plan 1)

This is a highly attractive and complex undulating valley and eroded plateau landscape. Overall it is gentle and tranquil in nature, highly rural with an intricate range of landform from ridge lines and plateau areas to sweeping valleys, steep sided hidden valleys and rounded hills. It is a pastoral landscape of irregular medium sized fields, tall hedges, plentiful field and hedgerow trees and numerous small woods and copses. There is very little development in Area 2A; Newton St Loe and Englishcombe are attractive, historic, small, contained villages to the north and south of the area respectively and in between lay just two farms. Englishcombe is visually almost completely hidden from any views being deep in the Newton Brook valley. Development in this area would have a major impact on the integrity of these villages.

There is strong separation of the city of Bath from Area 2 both in terms of character and visual amenity. With the exception of some more recent parts of Twerton, the city is almost invisible from Area 2, set in its contained hollow with only occasional glimpses of buildings and roofs set amongst trees on the skyline. Whiteway Road forms a strong physical linear edge to the city; the only encroachment to the south west of Whiteway Road being Haycombe Cemetery and a single line of houses close to the road.

Any extension of the city into Area 2 would bring about a fundamental change to the compact nature of the city as contained in a hollow in the hills and set within high quality countryside, with gentle but varied topography and a rich mix of hedgerows, fields, woods and copses all highly rural and tranquil with none of the deterioration of landscape often associated with countryside so close to a city. It would seriously degrade a key contributing feature of the city's unique character and values as a World Heritage Site and its setting.

Development would transform the landscape character of the area from very attractive and highly rural, currently unaffected by urban influence of any sort to an urban fringe landscape dominated by housing and it would be impossible to successfully mitigate due to the nature of the landform and wide visibility.

Cotswold Plateaux and Valleys (Areas designated 3 on Plan 1)

Area 3 is all plateau land. The Cotswold AONB boundary runs along Combe Hay Lane which is at the eastern boundary of Area 3A. It is a small area of Oolitic Limestone plateau marking the southern extreme of the main Cotswold ridge. The area is characterised by just a few large angular fields (two containing the Fullers Earth site and the park and ride) bounded by hedgerows or dry stone walls with tree belts at the plateau edge and on the steep slopes dropping away from the plateau.

Area 3A is more of a ridge in its nature than a classic plateau being narrow and elongated. The A367 effectively divides the area in half with the eastern side occupied by the Fullers Earth site and the well landscaped Odd Down Park and Ride and the west side being an agricultural field sloping gently to the north west. Development here would be highly damaging to the character and setting of the WHS. The compact nature of the city and its rural setting would be undermined by a visually prominent tongue of development extending south west along the ridge. Although development would be restricted to what is, in geological terms, still the Cotswold plateau and so in some senses could be said to remain contained by landform; this tongue-like ridge of land projects well beyond the contained edge of the city and is very strongly part of the wider landscape setting surrounding the city. In addition the A367 is an historic gateway into Bath in use at least since Roman times. Whilst this route into the city is fairly inauspicious as a gateway, there is currently an abrupt delineation between the countryside and the city which would be undermined by development along the A367. The area is also strongly separated from the city both in terms of landscape character and visual amenity and any development on the ridge along the A367 would be highly visible from a wide rural area as skyline development, and would be impossible to mitigate even in the medium to long term.

6. Conclusion

The results of this study indicate that development within this area would have a high impact on the City of Bath World Heritage Site, the landscape character and ecology of the area. However, it has also highlighted the difficulty of assessing the impact of development on the World Heritage Site without a detailed definition of the setting of the Site and its importance to the protection of the Site. Given the international status of the city's cultural heritage and the quality of its natural environment, together with the increasing pressure for development in and around Bath, further work should be done as soon as possible on defining the setting of the World Heritage Site.

It is therefore recommended that priority is given to undertaking a study to define the setting of the World Heritage Site in detail, including an assessment of the importance of that setting for the protection of the Site. The setting definition work carried out for this Landscape and World Heritage study is a basis on which a more detailed assessment could be made. This would then enable further testing of the results of this study, plus make easier any future assessments of impact of development anywhere around the fringes of the city.

Heritage and Environment Team
Planning Services
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Updated July 2006

Appendix 1

Landscape and Heritage Capacity Area Descriptions and Scores

Capacity Area 1A



Photograph 8



Photograph 9

Impact of Development on Landscape Character

Here the River Avon flows gently through a broad floodplain with moderate to steep valley sides. The landscape is open with arable and pasture fields, clipped hedges, strong tree belts and an occasional large copse. Two major roads and a mainline railway run through the valley emphasising its linearity but not acting as detractors. There is a strong separation between country and town marked by the gateway of the old stone Newbridge Bridge and its backdrop of trees which conceal the city. This is a high quality, rural landscape overlooked by the Cotswold AONB to the north. Any development would have a high impact with loss of the strongly rural character and sense of separation from the city. New development would not be integrated into the shape and form of the city and would have the character of ribbon development or a satellite village.

The Score is 3

Impact of development on Visual Effects

The valley floor contains major transport links which give wide and sustained views throughout the area. From the Cotswolds AONB which overlooks the area there are numerous public views as well as a main road. Any development would have a strongly negative effect on views especially from the AONB with loss of open rural vistas and wider views beyond the area. From the valley floor development would severely restrict the open vista transforming it to glimpses through urban built form. Impact would be high.

The score is 3

Impact on World Heritage Site

Development would have a significantly negative effect on this important gateway into Bath, which is currently marked by the distinctive landforms on the approach, the Newbridge Bridge and a strong backdrop of trees which hide the city beyond. Development in this area would transform the setting, edge of and approach to the World Heritage Site from rural to urban. In addition any development here would be separated both physically and visually from the city by the landforms, particularly the Newton Brook Valley. There is evidence of Roman occupation in this area, which would be directly linked to the Roman remains within the World Heritage Site and would need to be carefully managed in any development. The character of the edge of the World Heritage

Site would be damaged with the extension of the city out of its landscape hollow into the rural surroundings.

The Score is 3

Scope for Mitigation

This is very limited due to the open nature of the landscape and proximity of the AONB overlooking the valley.

The Score is 3

The Overall Capacity for Area 1A is Low

Capacity Area 1B



Photograph 47



Photograph 49



Photograph 52

Impact on Landscape Character

Intimate well-treed, steep sided valley of Newton Brook currently a caravan park in part. A high quality landscape although the landform is modified in places for the caravan park. Land east of the brook is within the Carrs Wood Local Nature Reserve (designated 5.7.2006). A small, high quality, low density development could be accommodated here on the footprint of the caravan park without major impact on landscape character but development on the scale required for an extension to Bath would dramatically change the character of this secluded valley from attractive rural countryside to urban.

The score is 3

Impact on Visual Effects

The valley is well hidden from views from the wider countryside but there are well used public paths through the valley and good views from the Carrs Wood open space above. Overall the impact on views is moderate to high depending on the nature of the development.

The score is 2.5

Impact on World Heritage Site

Development in the valley would negatively impact on the character of this part of the World Heritage Site and its setting, which is a strong natural landscape barrier to further development.

The score is 2.5

Scope for Mitigation

Retention of much of the existing vegetation, careful siting and new planting would be very effective but only with a small development.

The score is 1.5

The Overall Capacity for Area 1B is Low

Capacity Area 1C



Photograph 66



Photograph 67

Impact on Landscape Character

This is a very small, flat area of playing fields on edge of plateau, housing on two sides, mature trees to west and south on edge of plateau concealing the wider countryside beyond. Development here would radically change the character with the loss of the existing recreational function and backdrop of countryside to the west, although the overall urban edge character would remain.

The score is 2.5

Impact on Visual Effects

Principle views into the area are very local, from adjacent housing and road. There are also distant glimpse views from the higher land to the west. Locally the impact on views

would be high with loss of open aspect. Distant views would be little changed as long as the tree screen remained and was enhanced. The impact on views is moderate to high
The score is 2.5

Impact on World Heritage Site

This site is well contained within the city albeit on the city's edge. Impact on setting and character of the WHS would be small.

The Score is 1

Scope for Mitigation

The area is already well screened. Trees should be retained and additional planting provided. Playing fields would need to be replaced elsewhere which might be difficult.

The Score is 2

The Overall Capacity for Area 1C is Moderate

Capacity Area 1D



Photograph 4

Impact on Landscape Character

Sloping edge of plateau and upper slopes of Newton Brook valley in prominent location on side of Avon valley. Currently a public open space and Local Nature Reserve (designated 5.7.2006). Framed by mature woodland and large individual trees on three sides; housing to south side. Development would have a severe impact on the character of this site which is part of the wooded backdrop which separates the city from the countryside to the west.

The Score is 3

Impact on Visual Effects

This is a very prominent site in the wider landscape and especially from the Cotswolds AONB. There are also immediate local views from housing and paths. Development would transform the strong wooded / rural view which is so important to the setting of the city (see below).

The Score is 3

Impact on World Heritage Site

Development of this site would negatively impact upon the distinctive landscape that forms the entrance to the World Heritage Site at this point. The site is outside the landscape hollow in which the city lies and would constitute a breach of that containment, opening up the urban edge to much wider views and would urbanise the rural edge of the World Heritage Site in this area.

The score is 3

Scope for Mitigation

Mitigation would not be possible due to its prominence on the valley side.

The Score is 3

The Overall Capacity for Area 1D is Low

Capacity Area 2A



Photograph 13



Photograph 15



Photograph 17



Photograph 54



Photograph 55

Impact on Landscape Character

Attractive, high quality, rural landscape. Complex landform of undulating plateau, ridges and valleys. Overall open character but many hidden valley features. Agricultural landscape with two small historic villages and two farms in a patchwork of medium to large irregular fields, good hedges, individual specimen trees and small woods. The city is almost completely hidden from view from much of this area. Strategic development would radically change the tranquil rural character of this attractive landscape. Intricate landform would be lost and development would present as an entirely separate settlement rather than an extension of the city. This would be on completely different scale to the existing villages and would damage their setting. The impact would be severe.

The Score is 3

Impact on Visual Effects

In such a complex landscape there are numerous vistas from public viewpoints as well as views from more major roads. Visual impact of strategic 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.

The Score is 3

Impact on World Heritage Site

Development within this large site would negatively impact on both the rural setting of the World Heritage Site, and on the containment of the city within the landscape hollow. The city is currently barely visible from this rural area and development down the slopes surrounding the World Heritage Site would undermine the hidden character of the city and urbanise the rural setting.

The Score is 3

Scope for Mitigation

Openness of this area, especially the slopes down from the city would render mitigation almost impossible.

The Score is 3

The Overall Capacity for Area 2A is Low

Capacity Area 2B



Photograph 18



Photograph 47



Photograph 62

Impact on Landscape Character

A small area of gently sloping plateau, arable with clipped hedges; very open in nature with wide ranging vistas and dominated by sky; completely separated from city. Any development would be very prominent, on the skyline and physically unrelated to the city. Impact on character would be high and incongruous.

The Score is 3

Impact on Visual Effects

Views are widespread both local from adjacent road, Whiteway and Newton St Loe as well as from the Cotswolds ridge and higher land to the south and west as well as from the Avon valley. Development would be on the skyline and would strongly detract from the attractive rural landscape.

The Score is 3

Impact on World Heritage Site

This area is detached from the edge of the city and World Heritage Site and would be a satellite village to the city, an urban development in the rural setting of the World Heritage Site, degrading the rural character of that setting.

The Score is 3

Scope for Mitigation

Very limited, would require such extensive planting in an exposed setting that only limited space left for development.

The Score is 3

The Overall Capacity for Area 2B is Low.

Capacity Area 2C



Photograph 19



Photograph 21

Impact on Landscape Character

Undulating plateau area of arable and pasture fields with some woodland blocks on slopes. There are distant views to the Cotswolds and the area is very open with plentiful sky. There is no linkage to Bath either physically or visually and any development would be incongruous and destroy the high quality rural character.

The Score is 3

Impact on Visual Effects

There are views from several footpaths, a network of lanes and throughout the wider countryside. Any development would be skyline in nature and visually affect a wide area blocking existing rural views and creating a poorer quality visual amenity over a wide area.

The Score is 3

Impact on World Heritage Site

This area is detached from the edge of the city and World Heritage Site and would be a satellite village to the city, an urban development in the rural setting of the World Heritage Site, degrading the rural character of that setting.

The Score is 3

Scope for Mitigation

Mitigation whether by planting or landform modelling would be impractical due to the multiple skyline effects and overall visual prominence.

The Score is 3

The Overall Capacity for Area 2C is Low

Capacity Area 3A



Photograph 24



Photograph 25



Photograph 29

Impact on Landscape Character

Small tongue of Cotswold plateau edge forming a ridge extending to the south west of the city along the A367. Arable fields with small woods on slopes to the west of the road with existing Park and Ride site and Fullers Earth works site to the east. Open and exposed character, very rural with sky very prominent in the view. No relationship to city. Views to higher Cotswolds ridges and edge of city hidden behind trees. Impact of development here would radically change the rural character introducing skyline ribbon development into a strongly rural area.

The score is 3

Impact on Visual Effects

As a ridge line there are numerous views from the wider countryside especially to the south west and west, as well as from the A367, Kilkenny Lane and the Old Fosse Road at the city's edge. Development would be on the skyline, be highly intrusive in widespread country views and extend existing night sky problems associated with the Park and Ride even further into the countryside.

The Score is 3

Impact on World Heritage Site

The A367 is a major gateway into the World Heritage Site. Currently the city is well contained by landform and vegetation and is largely hidden from view until the final approach. Development on this site would negatively impact on the rural character of this part of the World Heritage Site's setting and would constitute a breach of the tight landscape containment of the city. In addition, a development here would be largely detached from the city due to the nature of the city's edge at this point, including the Park & Ride and associated roundabout.

The Score is 3

Scope for Mitigation

Mitigation very difficult due to skyline, exposure and limited space.

The Score is 3

The overall capacity for Area 3A is Low

Appendix 2

Policy Context

The main relevant policies from the following policy and management documents are given as extracts in this appendix:

- City of Bath World Heritage Site Management Plan (2003)
- Planning Policy Guidance Note for the Historic Environment PPG15
- Planning Policy Guidance Note for Archaeology and Planning PPG16
- PPS7 – Sustainable development in rural areas (2004)
- Regional Planning Guidance for the South West RPG10
- Joint Replacement Structure Plan (2002)
- Bath City Local Plan (1997)
- Wansdyke Local Plan (2000)
- Bath & North East Somerset Local Plan (Revised Deposit Draft 2003)

The list (and following extracts) should not be considered as comprehensive, as other policies will also be applicable to the work. Other documents that are also relevant include:

- Cotswolds AONB Management Plan
- Rural Landscapes of Bath and North East Somerset: A Landscape Character Assessment SPG 2003
- Bath City-wide Character Appraisal SPD 2005

INTERNATIONAL LEVEL

City of Bath World Heritage Site Management Plan

Objective 11

The Local Authority and other agencies involved in the management of the World Heritage Site should not permit any development that would be detrimental to the World Heritage Site and its setting, and developers should prepare high quality development schemes, taking into account the values of the World Heritage Site and the ability of the Site to accommodate change.

PLANNING POLICY

NATIONAL LEVEL

Planning Policy Guidance Note for the Historic Environment PPG15

Paragraph 2.22

No additional statutory controls follow from the inclusion of a site in the World Heritage list. Inclusion does, however, highlight the outstanding international importance of the site

as a key material consideration to be taken into account by local planning authorities in determining planning and listed building consent applications.

2.23 Each local authority concerned, taking account of World Heritage Site designation and other relevant statutory designations, should formulate specific planning policies for protecting these sites and include these policies in their development plans. Policies should reflect the fact that all these sites have been designated for their outstanding universal value, and they should place great weight on the need to protect them for the benefit of future generations as well as our own. Development proposals affecting these sites or their setting may be compatible with this objective, but should always be carefully scrutinised for their likely effect on the site or its setting in the longer term. Significant development proposals affecting World Heritage Sites will generally require formal environmental assessment, to ensure that their immediate impact and their implications for the longer term are fully evaluated.

Planning Policy Guidance Note for Archaeology and Planning PPG16

Paragraph 8

Where nationally important archaeological remains, whether scheduled or not, and their settings, are affected by proposed development there should be a presumption in favour of their physical preservation.

PPS7 – Sustainable development in rural areas

15. Planning policies should provide a positive framework for facilitating sustainable development that supports traditional land-based activities and makes the most of new leisure and recreational opportunities that require a countryside location. Planning authorities should continue to ensure that the quality and character of the wider countryside is protected and, where possible, enhanced. They should have particular regard to any areas that have been statutorily designated for their landscape, wildlife or historic qualities where greater priority should be given to restraint of potentially damaging development.

16. When preparing policies for LDDs and determining planning applications for development in the countryside, local planning authorities should:

- (i) support development that delivers diverse and sustainable farming enterprises;
- (ii) support other countryside-based enterprises and activities which contribute to rural economies, and/or promote recreation in and the enjoyment of the countryside;
- (iii) take account of the need to protect natural resources;
- (iv) provide for the sensitive exploitation of renewable energy sources in accordance with the policies set out in PPS22 and
- (v) conserve specific features and sites of landscape, wildlife and historic or architectural value, in accordance with statutory designations.

REGIONAL LEVEL

Joint Replacement Structure Plan

Policy 3

Local Plans will:

- identify areas which exhibit common environmental characteristics or elements, following the characterisation approach supported by the Countryside Agency and English Nature, and identify in each area those characteristics and elements which make a significant contribution to local character or are of importance;
- contain a strategy for the conservation and enhancement of all environmental assets, including landscapes, nature conservation and the built and historic environment, which make a significant contribution to that character and distinctiveness as well as those which are already recognised as of local, national or international importance through prior designation;
- contain an urban renaissance strategy for their urban areas, which sets out an integrated approach towards the application of relevant policies and initiatives.

Policy 6

In Bath, development and transport proposals will maintain and enhance the city's economic and social prosperity, and its roles as a regional centre and a focus for international tourism, whilst safeguarding and contributing to its status as a World Heritage Site.

Policy 17

Within Local Plans, emphasis will be placed on ensuring the continued conservation and enhancement of the character and distinctiveness of the landscape, and where necessary the restoration or regeneration of degraded landscapes. Where development or land use change occurs and significant landscape impact cannot be avoided or mitigated, the creation of new landscape features or elements which contribute to the character of the locality may be considered.

Local Plans will identify landscape character areas using a common characterisation approach and planning authorities should seek to coordinate policy approaches for such areas across administrative boundaries. Within individual landscape character areas, those features and elements of the landscape which make a significant contribution to the character and distinctiveness of the locality should be identified and appropriate strategies applied to guide the continued conservation and enhancement of that particular area.

Within the Cotswolds and Mendip Hills Areas of Outstanding Natural Beauty the priority will be the conservation of their particular landscape character and distinctiveness, with due regard to the continued economic and social well-being of the area. Major industrial or commercial development within an AONB or which would adversely affect it by virtue of proximity, will not be permitted unless an exception is justified by proven national need and a lack of alternative sites.

Policy 19

Local Plans will, through existing national/international designations, and other policies and initiatives:

- protect that part of the cultural heritage that consists of the built and historic environment of the area and manage development and land use change in a manner that respects local character and distinctiveness, ensuring that new development and other land use changes respect and enhance local character through good design and conform with any local character statement / guidance produced locally;
- protect Scheduled Ancient Monuments and other nationally important archaeological remains, which should be preserved in situ and their settings maintained and enhanced; and
- require development proposals affecting archaeological sites of local importance to demonstrate an overriding need for the development, to provide for a mitigation strategy where necessary, and to provide for appropriate prior investigation and recording of the site.

Regional Planning Guidance for the South West RPG10

Policy EN 1: Landscape and Biodiversity

Local authorities and other agencies in their plans, policies and proposals, should:

- provide for the strong protection and enhancement of the region's internationally and nationally important landscape areas and nature conservation sites;
- draw up policies for the protection of nature conservation interests of regional and local significance;
- encourage the maintenance and enhancement of the biodiversity resources of the region, having particular regard to the targets set out in tables 3, 4 and 5;
- promote the restoration and expansion of depleted and vulnerable biodiversity resources in order to reverse fragmentation and create continuous viable habitats;
- indicate that the protection and, where possible, enhancement of the landscape and biodiversity should be planned into new development;
- have regard to the significant landscape joint character areas of the region set out in this RPG and aim to conserve and enhance local character;
- take measures to protect the character of the countryside and the environmental features that contribute towards that character, including the minimisation of light pollution.

Policy EN 3: The Historic Environment

Local authorities and other agencies in their plans, policies and proposals should:

- afford the highest level of protection to historic and archaeological areas, sites and monuments of international, national and regional importance;
- indicate that new development should preserve or enhance historic buildings and conservation areas and important archaeological features and their settings, having regard to the advice in PPG15 and PPG16;
- indicate that policies and programmes should work towards rescuing buildings and monuments at risk;

- encourage the restoration and appropriate re-use of buildings of historic and architectural value and take a particularly active role in bringing about their restoration where this would help bring about urban regeneration;
- take account of the landscape context and setting of buildings and settlements; of building materials; and of the patterns of fields, hedgerows and walls that distinguish one area from another.

Policy EN 4: Quality in the Built Environment

Local authorities, developers and other agencies should work together to further the objectives of urban renaissance and make the urban areas places where people wish to live. They should aim to achieve:

- high quality architecture, urban design, layout and landscape architecture in all new development;
- improvements to the environment in cities, towns and villages. This should also recognise and maximise the positive contribution that trees, other planting and open spaces can make to urban areas in terms of their recreational, nature conservation and wider environmental and social benefits;
- schemes to create more sustainable, safer, secure and attractive urban and built forms, a balanced mix of uses, higher densities and sustainable transport patterns;
- land assembly to bring forward previously developed “brownfield” sites and enable urban restructuring and redevelopment;
- schemes both within urban areas and at the urban fringe that protect and enhance distinctive features and settings of the locality and make use of local character to create identity and a sense of place that reflects their context;
- design and layout solutions relevant to particular sites and their context, which take account of public health, crime prevention and community safety issues and which build upon local distinctiveness.

Policy SS 9: Bath

The local authority, developers, infrastructure and transport providers and other agencies should work together to achieve the following for Bath:

- ensure that Bath’s unique environment is conserved and enhanced;
- encourage development for housing within the city where it can be achieved without damage to environment quality;
- recognise the need for economic development that enhances its role as a centre for business, cultural activities, retailing and tourism;
- give a high sub-regional priority to new public transport initiatives and other measures to reduce road traffic and congestion within the city, including that arising from road traffic between the M4 and the South;
- review the Green Belt in accordance with Policy SS 4.

LOCAL PLANS

Bath City Local Plan

Policy C1

The City Council will regard the inclusion of the City of Bath on the UNESCO list of World Heritage Sites as a key material consideration in determining planning applications, and

those for development affecting listed buildings and their setting in the Conservation Area.

Policy C2

The City Council will require development to be a high standard of design, and sensitive to and compatible with the scale, height, bulk and character of the surroundings.

Policy L1

The City Council will protect and enhance the landscape of the Cotswolds Area of Outstanding Natural Beauty (AONB) as shown on the proposals map. When considering proposals in the designated Area of Outstanding Natural Beauty, the City Council will have regard to the development control principles adopted by the Cotswolds Area of Outstanding Natural Beauty Joint Advisory Committee, and will not permit developments which:-

- (i) are likely to generate large volumes of traffic; or,
- (ii) create noise, atmospheric, water or ground pollution; or
- (iii) due to the scale or the nature of the proposed use, have a detrimental impact on the landscape character or appearance of the area.

Policy L20

In preparing proposals for development, consideration should be given to landscape setting and landscape design. This should allow for the appropriate protection and incorporation of existing trees, hedges and shrubs and other natural features on, or adjacent to the site, and for the detailed design of hard and soft landscape areas of the site.

Wansdyke Local Plan

Policy GEN.2

In considering proposals for development the District Council will expect the development to:

- (i) achieve a high standard of design, siting and site treatment which fully takes into account local environmental conditions;
- (ii) respect the traditional character, form, relationship and materials of local buildings;
- (iii) respect, conserve and where possible enhance the landscape setting of the proposal and significant views, both long and short distance, which might be affected;
- (iv) retain and where possible enhance existing natural and man-made features of wildlife, landscape, historic and community value;
- (v) incorporate a high standard of landscaping, where such measures are considered appropriate.

Policy LNC.1

Development in the countryside which detracts from the landscape character or quality or conflicts with Policies LNC.9A, LNC.9B or LNC.9C, will not be permitted. The District Council will encourage the sympathetic management of features of the landscape which are of major importance for wild flora and fauna.

Policy LNC.2

Development which harms the natural beauty of the designated AONBs and any feature that contributes to that beauty will not be permitted.

In particular, proposals for major commercial or industrial development will not be permitted unless proven national interest and lack of alternative sites justify it.

Where development is permitted, the scale, siting, size, design, materials and landscaping should be in sympathy with the architectural and landscape character of the AONB. When proposals for development in surrounding areas are considered, regard will be had to any adverse impact upon the natural beauty of the AONBs.

Bath & North East Somerset Local Plan

Policy BH.1

Development that will have an adverse impact on the World Heritage Site of Bath or its setting will not be permitted.

Policy D.4

Development that relates to its context and does not have an adverse effect on the landscape setting, natural and man made features and are adaptable to allow for future change of use and, where possible, allowing for future expansion.

Policy NE.1

Development which does not either conserve or enhance the character and local distinctiveness of the landscape will not be permitted.

Policy NE.2

Development which adversely affects the natural beauty of the landscape of the designated Areas of Outstanding Natural Beauty will not be permitted. Major development within an AONB, or which would affect it by virtue of proximity, will not be permitted unless;

- (i) an exception is justified by proven national need and
- (ii) there is a lack of or are no alternative options

Minerals development within an AONB will only be permitted where it is in the national interest or meets a local requirement for traditional building materials.

Policy NE.3

Development that would adversely affect the landscape qualities of the Important Hill-sides shown on the proposals map, or their contribution to the character and landscape setting of Bath and Radstock, will not be permitted.

Policy NE.4

Development will only be permitted where;

- (i) it does not have an adverse impact on trees and woodlands of wildlife, landscape, amenity, productive or cultural value; and
- (ii) it includes the appropriate retention and new planting of trees and woodlands and
- (iii) it does not have an adverse impact on a veteran tree.

In the case of an unavoidably adverse impact on trees and woodlands of wildlife, landscape, amenity, productive or cultural value, compensatory provision is made.

Policy NE.7

Development within the Bat Protection Zones, as defined on the Proposals Map, that would adversely affect structures, feeding grounds or landscape features used by Horseshoe Bats, will not be permitted unless compensatory provision of at least equal value is made.

Appendix 3

Photographic Viewpoints

The following is a comprehensive list of photographic viewpoints taken for the study and should be read in conjunction with Plan 2. Selected photographs have been used to illustrate the text of the report.

1 – 11 From entrance to Kelston Park, Kelston Road

- 1 View east towards city
- 2 New Bridge
- 3 New Bridge to Carrs Wood
- 4 A4 and Carrs Wood
- 5 Twerton
- 6 Twerton and rural area to the south
- 7 A4 and Seven Acre wood
- 8 A4 and rural area to south
- 9 A4 and Newton St Loe nestling behind trees and rural area
- 10 As above, further west
- 11 A4, Corston roundabout and rural area

12 – 18 From Whiteway Road, near junction of Poolemead Road

- 12 Looking south west across fields
- 13 To Pennsylvania Farm
- 14 Looking west
- 15 Looking west / north west
- 16 To Claysend Farm
- 17 Towards Newton St Loe – Claysend and Home Farm in the foreground
- 18 Towards Newton St Loe and plateau by Seven Acre wood

19 – 21 From Kilkenny Lane (first viewpoint)

- 19 Looking north towards city
- 20 To right of above view
- 21 Looking up to edge of plateau at Odd Down

22 – 31 From Kilkenny Lane (second viewpoint)

- 22 Plateau
- 23 Plateau
- 24 Plateau
- 25 Towards Fullers Earth Site
- 26 Plateau
- 27 To Odd Down School
- 28 North east towards Old Fosse Road
- 29 North to Rush Hill
- 30 To west of above location
- 31 To Middle Wood at edge of plateau

32 – 46 Photographs of or looking out of Odd Down plateau

- 32 From p.r.o.w. west of Sulis Manor looking south
- 33 Similar to above
- 34 From within site to trees along south of site
- 35 Looking north to 90s housing
- 36 Towards housing and park and ride
- 37 Looking south over countryside
- 38 From within site by Sulis Manor looking south
- 39 From footpath crossing site (same viewpoint area for up to photo 46) to housing on road to Southstoke
- 40 Towards 90s housing
- 41 To internal field wall and planting
- 42 Looking to mature trees at south boundary
- 43 Similar to above
- 44 To houses on road to Southstoke
- 45 Similar to above
- 46 Corner of 90s development and edge of Sulis Manor

- 47 From Carrs Wood plateau overlooking Newton Mill Caravan Park
- 48 From entrance to Newton Mill Caravan Park
- 49 Newton Brook from entrance road
- 50 Upper level of caravan park
- 51 Approaching Newton Mill with glimpses of Redland Park roofs
- 52 Upper level of caravan park looking north

- 53 From near junction, Claysend towards Newton Mill Caravan Park
- 54 From Claysend Farm showing edge of city along Whiteway Road
- 55 From Pennsylvania Farm to edge of city (Rush Hill, Twerton Roundhill)
- 56 From Pennsylvania Farm to Twerton and Lansdown ridge
- 57 From Pennsylvania Farm to Lansdown ridge beyond edge of Twerton

58 – 61 Viewpoints from lane north east of Pennsylvania Farm

- 58 To Twerton
- 59 To Lansdown ridge
- 60 To Twerton
- 61 Towards Haycombe Cemetery

62 – 65 From road passing Newton St Loe around edge of city

- 62 View over plateau to Kelston Park and Twerton
- 63 To Seven Acre Wood and Lansdown Ridge
- 64 To city, Lansdown Ridge and Bathampton Down
- 65 To Twerton

- 66 From Newton Road to open space and countryside to west
- 67 From Newton Road looking over open space to housing to north east

**Appendix 4
Survey Form**

South and West of Bath Capacity Study

Landscape Character Area:		Area No.
Location:		
Date:	Weather:	Film/Photo No.

Description of Landscape Character:

Potential Impact of Development on Landscape Character:

Landform:	
Land Use:	
Vegetation Cover:	
Field Boundaries:	
Field Pattern:	
Field Sizes:	
Settlement / Structures (age and style):	
Building Materials:	
Routes:	
Enclosure:	
Views / Relationships to other Character Areas:	
Visual Horizon:	
Detractors:	
Features (positive landmarks and finer details):	
Senses:	
overall description of impact on landscape character:	
Score:	

Visual Effects:

Describe effect e.g. impact on skyline / impact on view (specify from where)	Describe nature of impact and severity
Overall effect on views	
Score	

Impact on World Heritage Site

Describe effect	Describe nature of impact and severity

Scope for Mitigation

Appropriate type of mitigation	Describe likely effectiveness
Overall effectiveness of appropriate mitigation:	
Score:	

Other effects

--	--

Summary of the Capacity of the Area to Absorb Development

Definitions:

- 1 low effect i.e. little impact on landscape character / little impact on views / appropriate mitigation will be effective resulting in a low impact
 - 2 moderate effect i.e. moderate impact on landscape character / moderate impact on views / appropriate mitigation will be reasonably effective resulting in a moderate impact
 - 3 high effect i.e. high impact on landscape character / high impact on views / appropriate mitigation will not be effective resulting in a high impact
-

Any other observations:

Appendix 5

Ecological Capacity Study of the Potential for an Urban Extension to the South / South West of Bath

1. Background

This Study has been carried out in response to the October 21st Draft of the Regional Spatial Strategy from the Regional Assembly which states '*A sustainable urban extension should be considered south of Bath, subject to the need to address environmental and landscape constraints, its World Heritage Site status and transport implications, in the context of the Green Belt review.*'

2. Assessment of capacity

This assessment of development capacity is based upon

- a desk top review of ecological information held for the study area
- discussions with a project officer involved with Horseshoe bat study and conservation within the project area

No new surveys have been undertaken for this assessment. It should be noted that a number of the data sets available for review are based upon information that is at least 10 years old. The following data sets have been considered:-

International Sites
Sites of Special Scientific Interest
Sites of Nature Conservation Importance
Regionally Important Geological Sites
Priority Species
Priority Habitats
Notable Species
Bat Data

The distribution of key sites and features are shown on plans 3a and 3b. Plan 4 shows a basic assessment of development capacity for the study area

3. Findings

The review shows that much of the study area, particularly to the south of the Newton St Loe, and adjacent to the edge of Bath, is associated with high nature conservation value that would preclude the development of a major urban extension on environmental grounds. This reflects English Nature's initial advice on the RSS given at the regional level. Ecological Capacity is indicated on Plan 4.

This area (Plan 4 - 1E) is characterised by south facing slopes, with habitat mosaics of woodland, grassland and scrub, linked by hedgerows and streams, and includes a number of Sites of Nature Conservation Importance. The area also supports a range of notable species and key habitats, and is in very close proximity to a horseshoe bat roost of International Importance. Bat foraging studies show that much of this area forms a vital component of the foraging territory of the Greater Horseshoe bats associated with the roost. To the east of the Newton Brook there is a Local Nature Reserve (Plan 4 - 2E) of high nature conservation value, and both Sites of Nature Conservation Importance

(SNCI) and a Site of Special Scientific Interest (SSSI). In combination these factors pose significant environmental constraints to development, and severely limit the development capacity of the area.

Specific Issues

The distribution of designated sites including SNCIs, SSSIs and a Local Nature Reserve, and the occurrence of notable species would pose restrictions on the development of different locations within the study area (Plans 3a & 3b). Any development that directly impinges on these designated sites or on the habitats of notable species should be avoided and / or would require mitigation to avoid adverse effects resulting from development. There would also be a need to safeguard features of the landscape that are of major importance for wild flora and fauna. This will limit development capacity.

Of even greater significance is the proximity of the study area to the Combe Down Stone Mine SSSI/Special Conservation Area. This forms a component of the Bath and Bradford Bats Special Area of Conservation (SAC) which is a Site of International Importance for bats. It is associated with 15% of the UK greater horseshoe bat population.

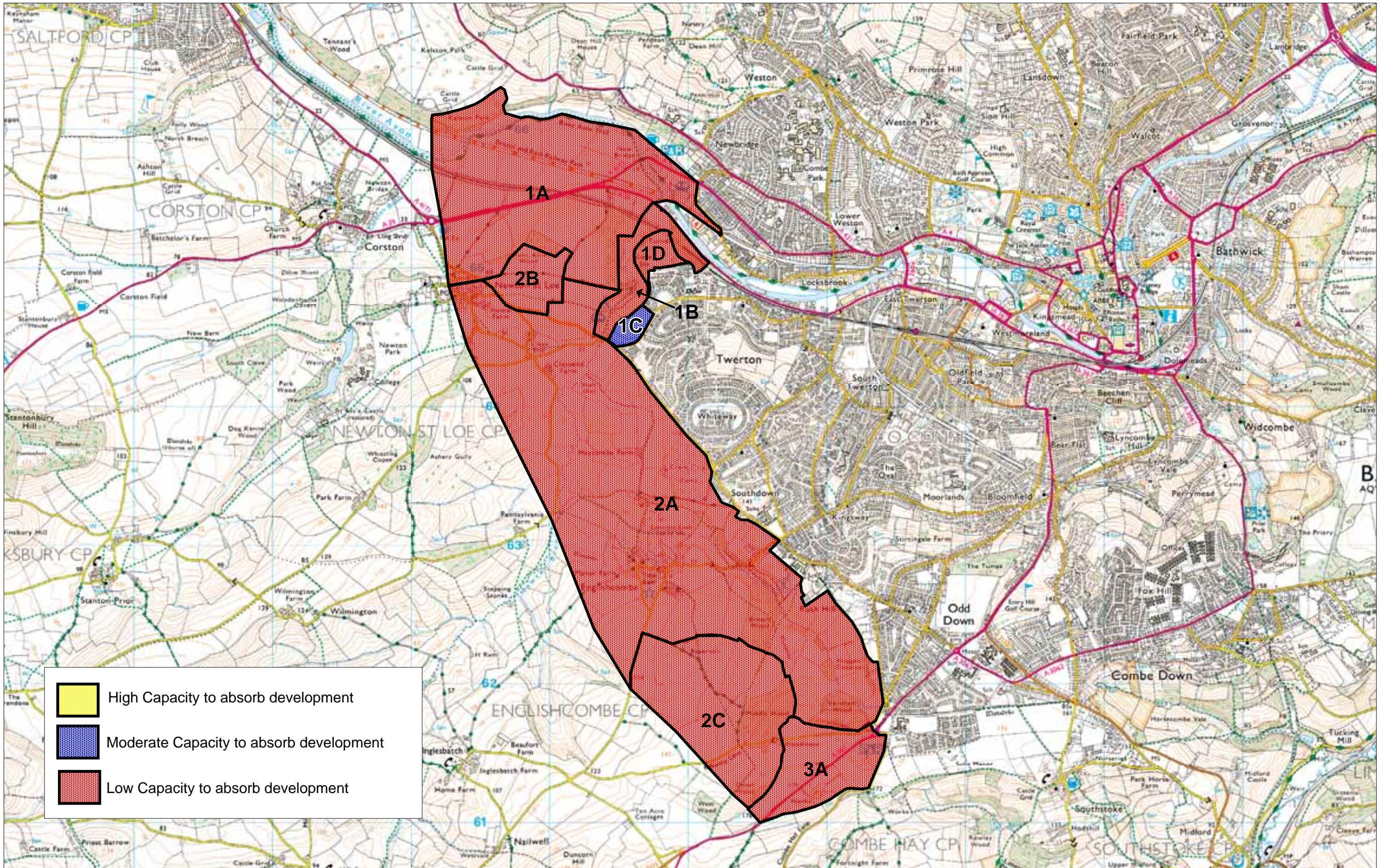
Detailed bat studies of the Combe Down Mine SAC, show that the mines are used by at least 10 species of bat. This includes both greater and Lesser Horseshoe bats, and Bechstein bats which are classified as being of Principle Importance under section 74 of the Countryside and Rights of Way Act 2000. Detailed studies show that the Greater Horseshoe bats utilise much of the study area to the south of Newton St Loe for foraging. The south facing slopes, hedgerows, woodland areas and waterways are of particular importance to these bats. It is considered that a strategic development of housing within this area (Plan 4 -1E) would have a significant adverse effect upon the quality and integrity of these foraging areas, and is likely have a significant adverse impact upon the SAC bat populations. This would have implications under the Habitat Regulations.

Given the fixed location of the SAC roost sites and the fact that the associated bat populations are dependant upon access to suitable high quality foraging habitats within 4km of the roost, it is considered unlikely that the adverse impacts of a strategic development could be adequately mitigated or compensated for. The development capacity of this area is therefore very low, and it is considered that this area (Plan 4 -1E) could not accommodate an urban extension.

The conservation importance of much of this area is formally recognised by its inclusion within a Bat Protection Zone shown on the Bath and North East Somerset Local Plan Revised Deposit Draft Proposals Map.

To the north of the Newton St Loe development could be accommodated without significant ecological impacts. However, as noted above development capacity is reduced by the presence of a Local Nature Reserve (Plan 4 -2E) and other designated sites. These sites would need to be protected from both direct and indirect impacts of any development allocation. **Reference must also be made to the Landscape and Heritage Capacity Study and the significance of this location for landscape and heritage impacts.** Any strategic allocation of housing would need to be associated with an increase in the provision of Local Nature Reserves to meet national targets.

December 2005 Updated July 2006

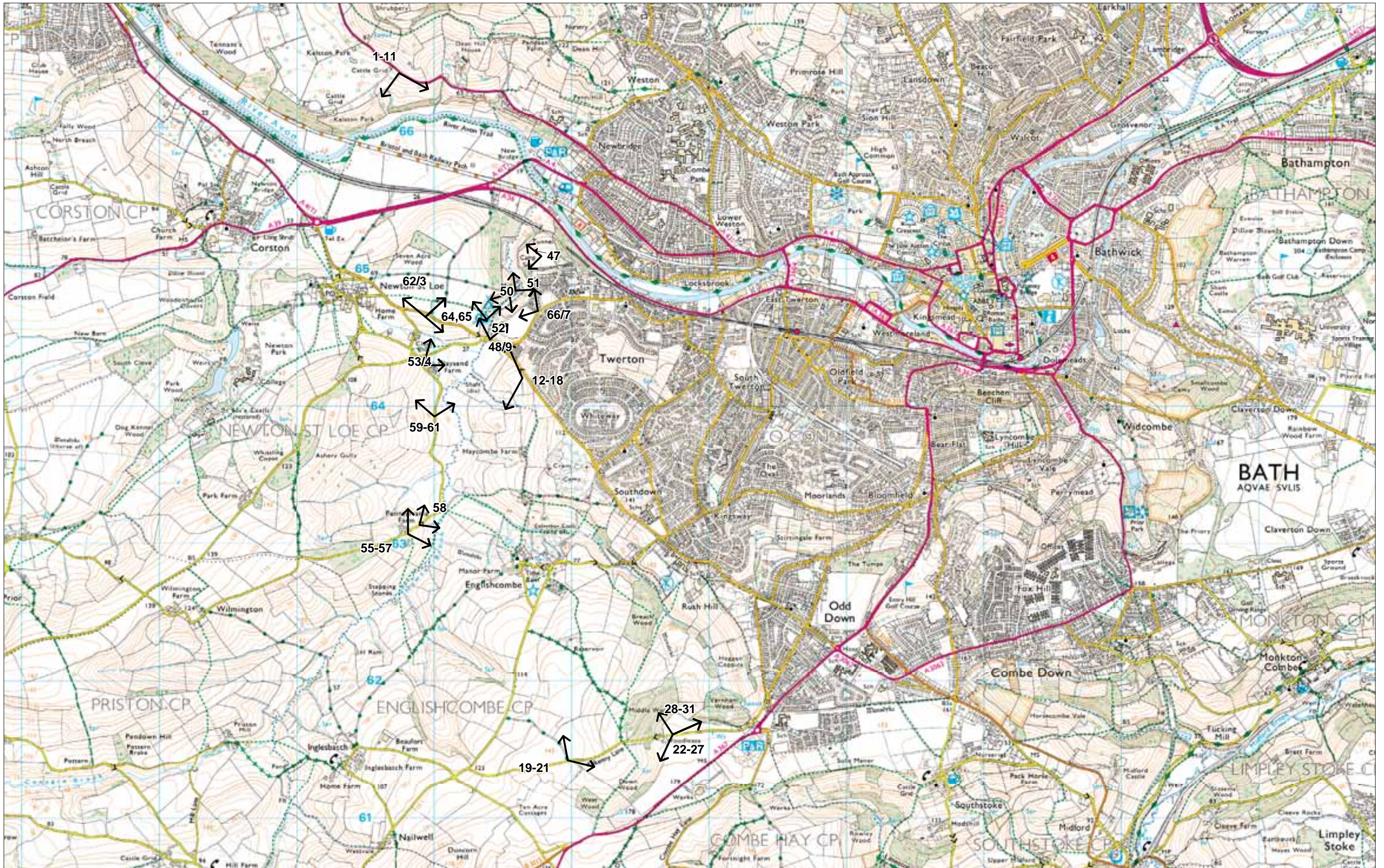


Plan 1
Landscape and Heritage Capacity

December 2005

Scale: 1:25,000

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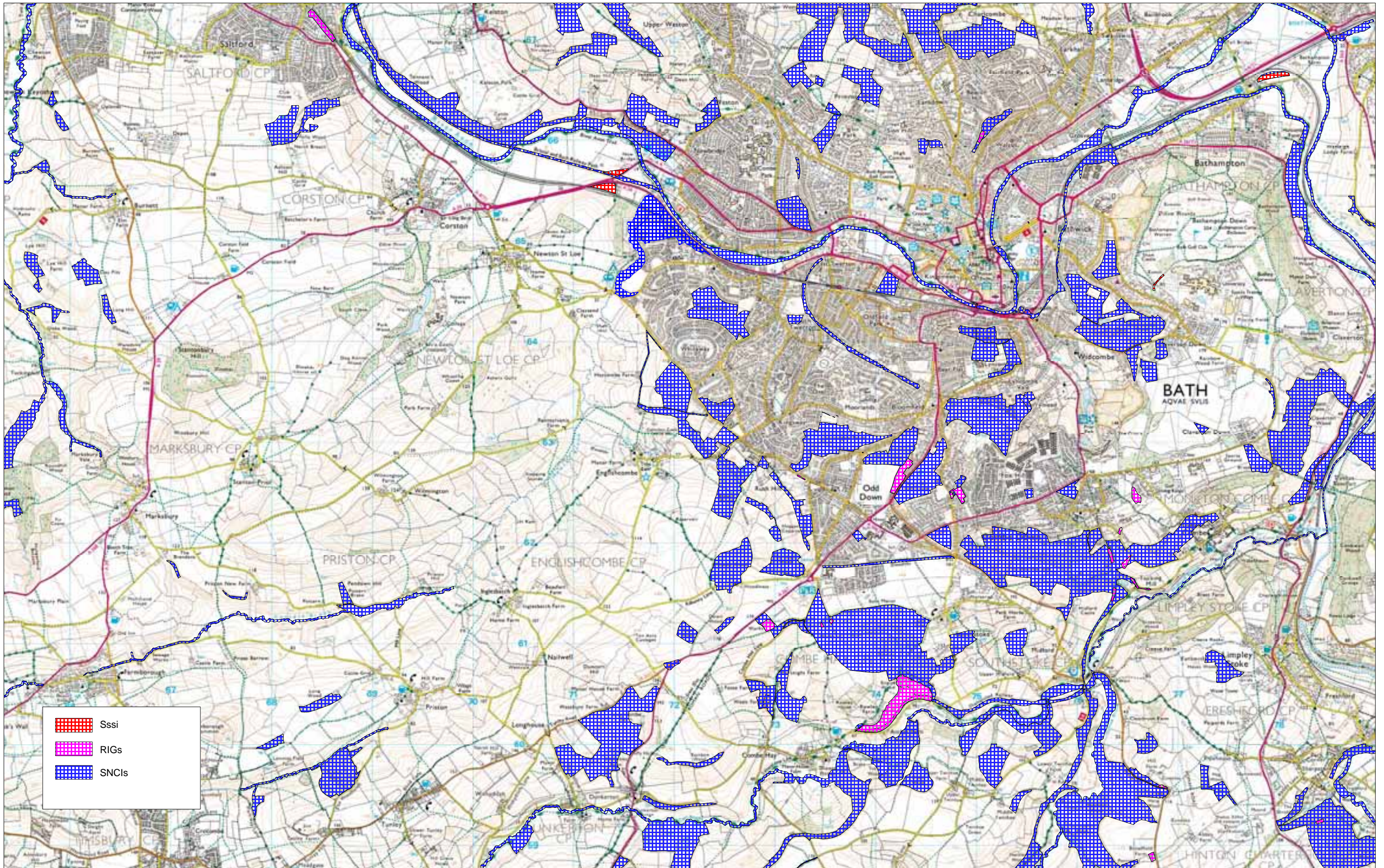


Plan 2 Viewpoints

December 2005

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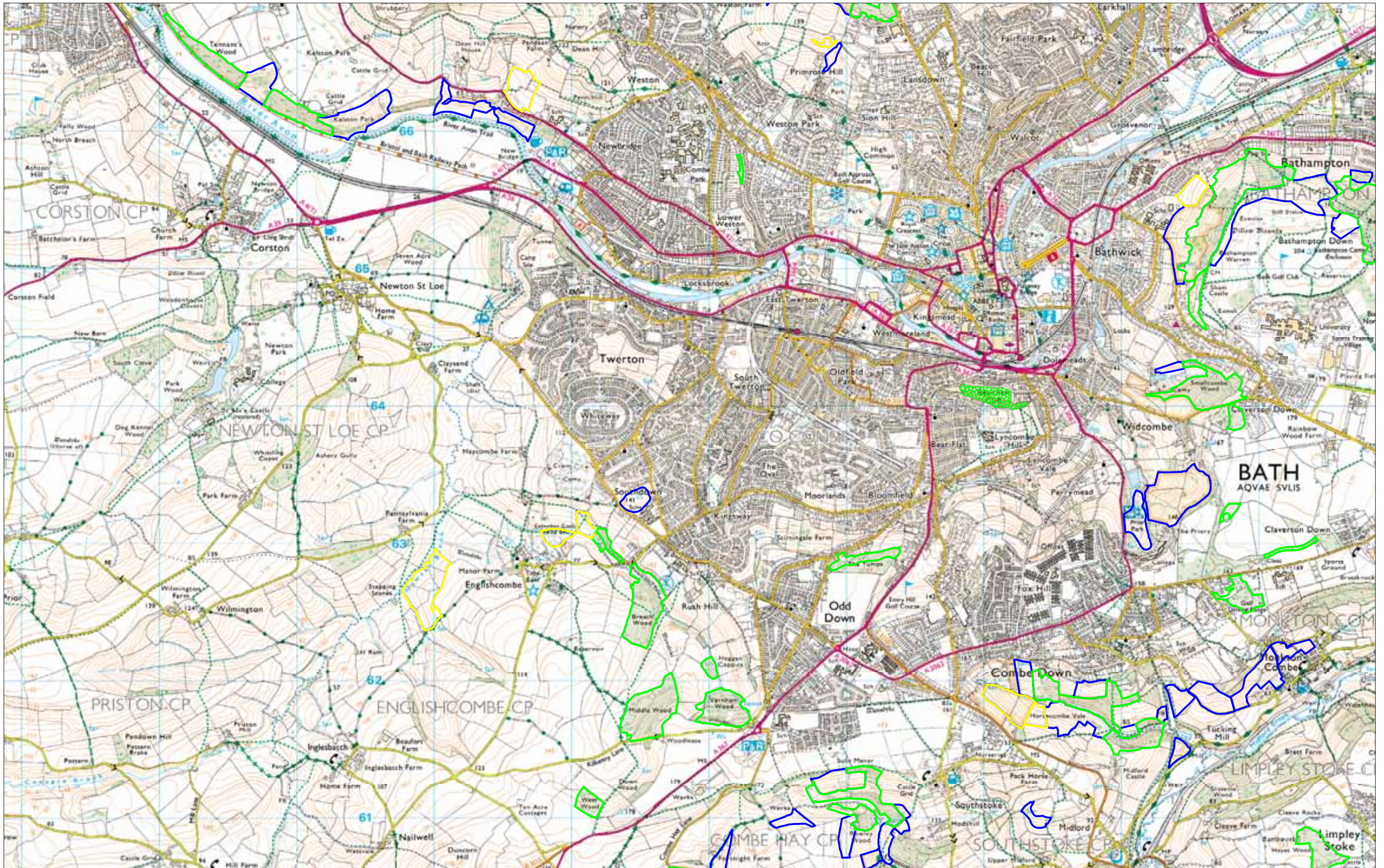


Plan 3a
SSSI's, SNCI's and RIG's

December 2005

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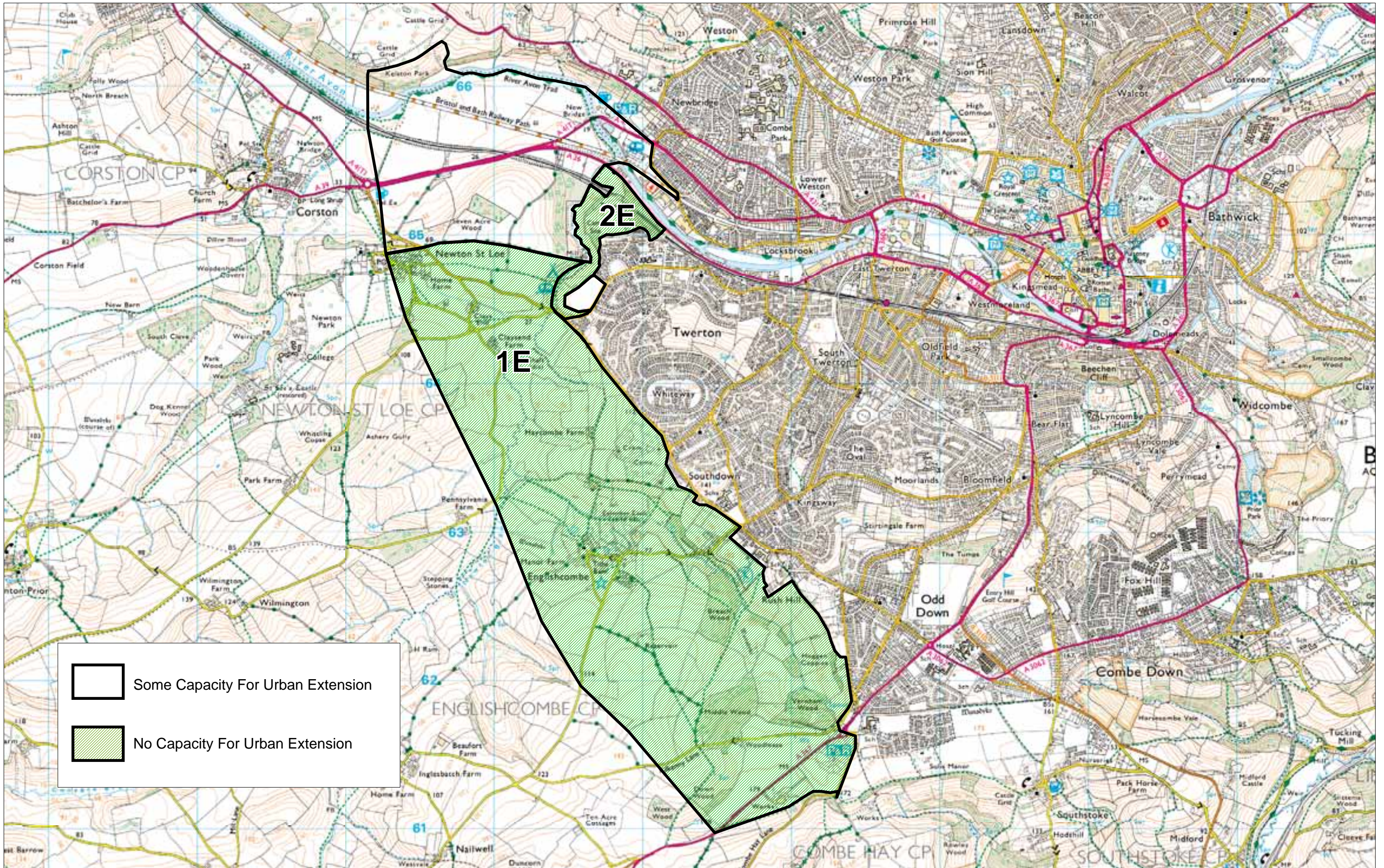


Plan 3b
Priority Habitats

December 2005

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Plan 4
Ecological Capacity

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