

## **Draft South West Regional Spatial Strategy**

### **Strategic Sustainability Assessment of Potential Urban Extension locations on land surrounding Bath**

#### **Methodology for Strategic Sustainability Assessment of land surrounding Bath (within and outside the Cotswolds AONB)**

##### **1.0 Introduction**

- 1.1 The draft Regional Spatial Strategy (RSS) identifies the need for an urban extension to Bath and identifies an area of search on the south/west side of the city for an urban extension of up to 1,500 dwellings. In locational terms the draft RSS broadly reflects the First Detailed Proposals (FDP) prepared by the West of England Partnership (WEP) which identified the possibility of an urban extension on this side of Bath.
- 1.2 In preparing the FDP the WEP undertook, at an early stage, a sieve mapping exercise identifying constraints to development. The Cotswolds AONB was identified as an absolute constraint to development and was therefore, excluded as potentially developable land.
- 1.3 In order to inform its response to the draft RSS the Council undertook environmental appraisal and capacity studies and Strategic Sustainability Assessment (SSA) work (see separately submitted reports) on examining urban extension options within the draft RSS area of search. The studies undertaken showed that an urban extension to the south/south west of Bath would cause significant environmental harm but also that an urban extension would potentially have social and economic benefits. Whilst the Council remains committed to protecting the World Heritage site of Bath and its setting it also recognises the economic role of the city and the importance of seeking to maintain its economic prosperity and providing for both economic development and associated housing within and close to the city. Therefore, the Council in its response to the draft RSS continues to support the provision of an urban extension but with a lower development capacity than that set out in the draft RSS in order to help reduce its environmental impact.
- 1.4 Work undertaken by the Council in support of its response to the draft RSS therefore primarily focussed on the draft RSS area of search, although the assessment area has also included land further north towards Newbridge. The areas assessed lie outside the Cotswolds AONB. PPS7 makes it clear that nationally designated areas including AONBs should be afforded the highest status of protection in relation to landscape and scenic beauty. Major development should be in the public interest and only take place in AONBs in exceptional

circumstances. Paragraph 22 sets out the criteria relevant to determining whether such circumstances exist. In summary these are:

- i. the need for the development, including in terms of national considerations;
  - ii. the cost of and scope for development elsewhere outside the AONB or meeting the need in some other way, and
  - iii. the detrimental effect on the environment, landscape and recreational opportunities and extent to which that could be moderated.
- 1.5 In order to ensure that criteria (ii) and (iii) set out in PPS7 are properly addressed and a full comparative 'sustainability' assessment of potential urban extension locations around Bath is established it is considered necessary to undertake an assessment of all land around the city of Bath, including that within the Cotswolds AONB. The status of the AONB designation and the weight to be applied to this status will then need to be determined and justified (see separate background paper on the importance of the Cotswold AONB).

## **2.0 Methodology**

- 2.1 In order to enable comparison with the areas already assessed outside the AONB broadly the same methodology has been followed that was employed for previous SSA work. The methodology used is set out in Appendix 3 of the document entitled 'RSS: Methodologies for Urban Capacity and Urban Extension Capacity Studies for Bath & North East Somerset'.
- 2.2 The impact of an urban extension and its performance in overall sustainability terms has therefore been undertaken by assessing it against the sustainability objectives/criteria set out in South West Regional Assembly SSA of Draft RSS, supplemented by assessment against Green Belt objectives. The assessment objectives/criteria are listed in Annex 1 for convenience.
- 2.3 In order to keep the SSA simple the impact and performance of a 'theoretical' urban extension with a capacity of up to about 1,500 dwellings as set out in draft RSS has been assessed. Using a land use budget approach it is estimated that a mixed-use urban extension accommodating that number of dwellings would have a development area of about 55 ha.
- 2.4 The SWRA has (for the urban extensions strategic re-assessment study by Arup) defined six potential development cells around the periphery of Bath for assessment purposes (see map attached as Annex 2). These development cells appear to have been defined by using major radial routes entering the city as well as the AONB boundary. These development cells have formed the basis of those

used for the SSA but their boundaries have, in some instances, been amended to correlate with the areas defined and used for the environmental capacity appraisal (see para 2.6 below).

- 2.5 The overall impact and sustainability performance of an urban extension within the development cells has been assessed. However, significant impacts (e.g. environmental) specific to parts of these development cells are noted where relevant.
- 2.6 Environmental impacts (SSA criteria 5) recorded in the SSA have been taken from the Environmental Capacity Appraisal study of areas within the AONB which is available as a separate report. The methodology for the AONB Environmental Capacity Appraisal is set out in the report and reflects the methodology used to assess potential development locations within the draft RSS area of search. However, contrary to the previous Environmental Capacity Appraisal work the appraisal of areas within the AONB has focussed on assessing and recording potential environmental impacts rather than to estimate development capacities. The broad SSA development cells have also been sub-divided, primarily on the basis of landscape character, in order to assist in identifying and recording environmental impacts of development.
- 2.7 Results of the assessment against all criteria (including those addressing economic and social concerns) for all of the development cells is recorded in the matrix (attached as Annex 3). From this matrix conclusions will be drawn summarising the overall sustainability impact of an urban extension within each development cell. Comparison of the sustainability performance of an urban extension within each development cell will be made, including the land outside the AONB (development cell F) previously assessed.
- 2.8 It should be noted that the previous SSA of development cell F was undertaken to examine the sustainability of 3 options i.e. no urban extension; an urban extension of up to about 1,000 dwellings; and an urban extension of about 1,500 dwellings. Therefore, this SSA has been carried out from a different perspective in examining the relative sustainability of locations for an urban extension to Bath. This has required some re-examination and amendment of the results of the previous SSA work in order to ensure that recorded impacts against social and economic objectives are specific to development cell F and where appropriate quantified to enable meaningful comparison.

## **ANNEX 1: SSA CRITERIA**

### **High level objective 1: improve health**

- 1.1 Improve health
- 1.2 Reduce health inequalities
- 1.3 Promote healthy lifestyles, especially routine daily exercise

### **High level objective 2: support communities that meet people's needs**

- 2.1 Help make suitable housing available and affordable for everyone
- 2.2 Give everyone access to learning, training, skills and knowledge
- 2.3 Reduce crime and fear of crime
- 2.4 Promote stronger more vibrant communities
- 2.5 Increase access to and participation in cultural activities

### **High level objective 3: Develop the economy in ways that meet people's needs**

- 3.1 Give everyone in the region access to satisfying work opportunities, paid or unpaid
- 3.2 Help everyone afford a comfortable standard of living
- 3.3 Reduce poverty and income inequality
- 3.4 Meet local needs locally
- 3.5 Increase the circulation of wealth within the region
- 3.6 Harness the economic potential of the coast in a sustainable way
- 3.7 Reduce vulnerability of the economy to climate change and harness opportunities arising

### **High level objective 4: Provide access to meet people's needs with least damage to communities and the environment**

- 4.1 Reduce the need/desire to travel by car
- 4.2 Reduce the need/desire to travel by air
- 4.3 Help everyone access basic services easily, safely and affordably
- 4.4 Make public transport, cycling and walking easier and more attractive
- 4.5 encourage a switch from transporting freight by road to rail or water

### **High level objective 5: Maintain and improve environmental quality and assets**

- 5.1 Protect and enhance habitats and species (taking account of climate changes)
- 5.2 Promote the conservation and wise use of land
- 5.3 Protect and enhance landscape and townscape
- 5.4 Value and protect diversity and local distinctiveness including rural ways of life
- 5.5 Maintain and enhance cultural and historical assets
- 5.6 Reduce vulnerability to flooding, sea level rise (taking account of climate change)

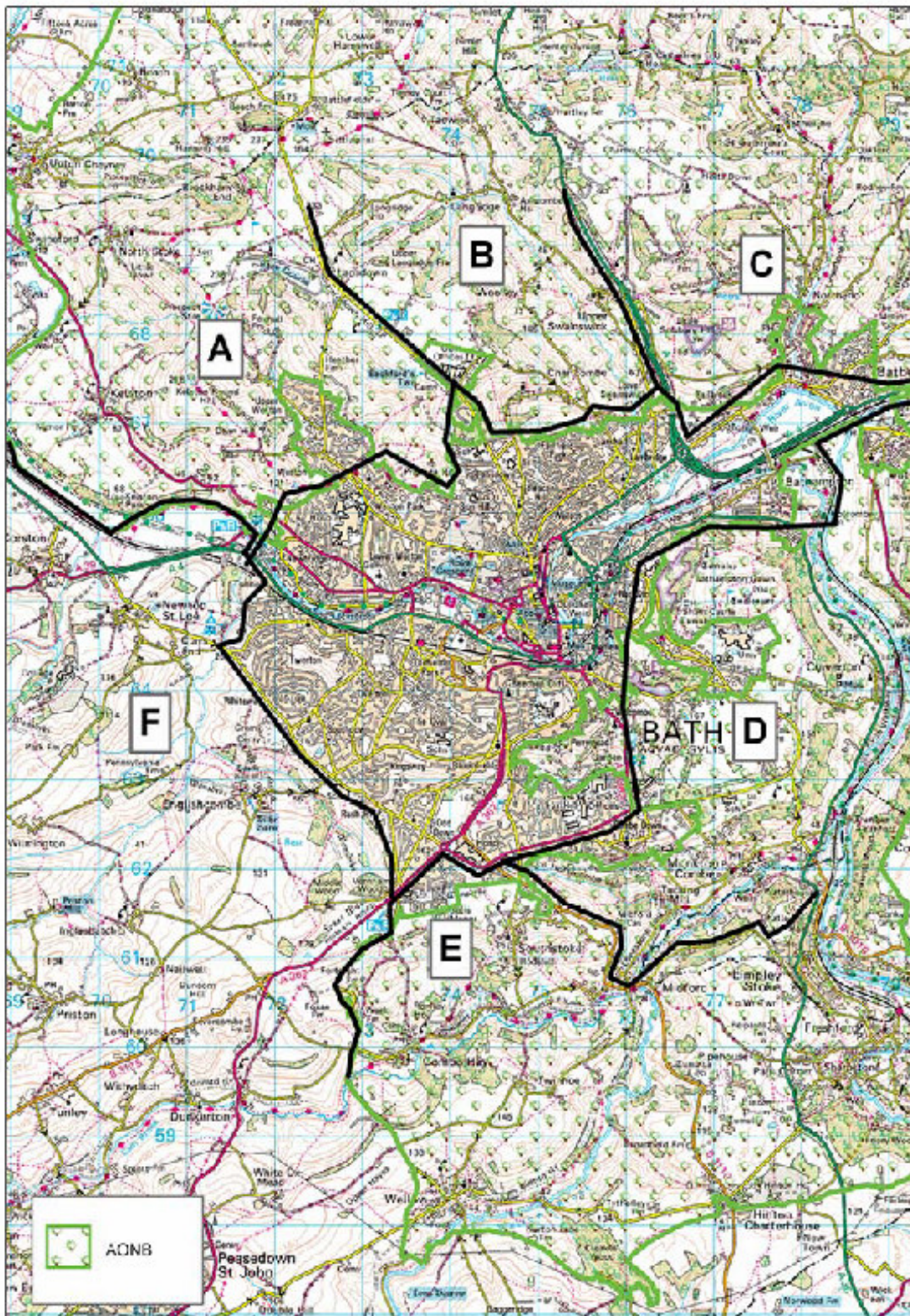
### **High level objective 6: Minimise consumption of natural resources**

- 6.1 Reduce non-renewable energy consumption and 'greenhouse' emissions
- 6.2 Keep water consumption within local carrying capacity limits (taking account of climate change)
- 6.3 Minimise consumption and extraction of minerals
- 6.4 Reduce waste not put to any use
- 6.5 Minimise land, water, air, light, noise and genetic pollution

**Supplemental objective 7: Meeting Green Belt objectives and priorities** i.e. as set out in PPG2, FDP, Draft RSS and Regional Assembly Strategic Green Belt Review



## ANNEX 2: MAP SHOWING SWRA/ARUP STUDY DEVELOPMENT CELLS



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## LOCATION OF LAND CELLS

| <b>Land Cell</b>   | <b>Sub Area identified in Assessment of Environmental Capacity</b> |                           |
|--|--|---------------------------|
| <b>Land Cell A</b><br><br>Situated to the north west of Bath between the government offices/ Lansdown racecourse and the River Avon  | Area 1   | Kelston Slopes            |
|  | Area 2   | Weston Slopes (South)     |
|  | Area 3i & ii   | Weston Slopes (North)     |
| <b>Land Cell B</b><br><br>Situated north of Bath, between the Government offices and village of Upper Swainswick.  | Area 4   | Landsown Plateau          |
|  | Area 5   | Charlcombe Valley         |
|  | Area 6   | Lam Brook Valley          |
| <b>Land Cell C</b><br><br>Situated to the north east of Bath and incorporates Solsbury Hill Fort and Northend.   | Area 7   | Little Solsbury Hill      |
| <b>Land Cell D*</b><br><br>Located to the east of Bath and incorporates the University Campus.<br>The River Avon runs along the eastern edge following its southward turn. | Area 8   | Bathampton (Upper Slopes) |
|  | Area 9   | Bathampton Down           |
|  | Area 10  | River Avon Valley         |
|  | Area 11  | The Midford Way           |
|  | Area 12  | Perrymead                 |
| <b>Land Cell E</b><br><br>Situated to the south of Bath and incorporates the villages of Southstoke and Combe Hay  | Area 13  | Cam Valley                |
|  | Area 14  | Odd Down                  |
| <b>Land Cell F</b><br><br>Situated southwest of Bath and incorporates the villages of Newton St. Loe and Englishcombe  | Area 15  | Odd Down                  |
|  | Area 16  | Haycombe                  |
|  | Area 17  | West of Twerton           |

\* The National Trust own significant land in this area all of which is thought to be inalienable. It has therefore been excluded from the assessment.



### **3.0 Broad Conclusions of the SSA**

#### **3.1 Cell A (Areas 1, 2 3ii) and Cells B-E (Areas 4-14)**

#### **3.2 Despite good accessibility to services and facilities, the environmental constraints that exist in these areas mean that development would not be environmentally sustainable.**

- These areas lie within the Cotswolds AONB. Their suitability for development needs to be assessed against the criteria of PPS7, as well as the environmental assessment of this sustainability appraisal.
- The fundamental green belt objective of preventing the coalescence of Bristol and Bath could be compromised by an urban extension in the western portion of Cell A (particularly in areas 1 and 2). There is a danger that a number of villages in Cells A-E could lose their identity as distinct peripheral settlements.
- Development in these cells would have a significant negative impact on a range of environmental objectives pertaining to nature conservation, landscape, the historic environment, and the setting of the World Heritage Site.
- Cells A and B are well related to local services and facilities, including primary and secondary schools, healthcare at the RUH, and neighbourhood shopping parades on Weston High Street and in Larkhall. Both cells benefit from a good bus service to the city centre. There is potential for the southern extent of cell A to benefit from the proposed rapid transit route that will link Newbridge to the city centre.
- Cell C, D and E are less well related to local retail services and facilities yet compare favourably with Cells A and B in terms of access to the city centre. There is potential for Cell C to benefit from the proposed rapid transit route that will link Lambridge to the city centre.

#### **3.3 Cell A (Area 3i)**

#### **3.4 Although this area lies within the Cotswold AONB the environmental impact of development (on the landscape setting of the city) would be lower than elsewhere and there is greater scope for mitigation. The area is also well connected to existing services and facilities. It therefore fares relatively well in terms of its environmental, as well as socio-economic sustainability.**



- This area lies within the Cotswolds AONB. Its suitability for development needs to be assessed against the criteria of PPS7, as well as the environmental assessment of this sustainability appraisal.
- Development here would have a high adverse impact on nature conservation interests but have less impact on the landscape and the historic environment compared to other areas (either within or outside the AONB)
- The fundamental objective of preventing the coalescence of Bristol and Bath would not be compromised by an urban extension in Area 3i of Cell A.
- There is scope for development on the lower slopes with the upper slopes continuing to fulfil their role as a green backdrop to the city. Whilst the cell will not benefit from the proposed rapid transit bus route, the existing bus network (proposed to be upgraded to 'showcase') provides good access to the city centre. This area also benefits from a range of local amenities, including a choice of schools and a neighbourhood centre on Weston High Street.

### **3.5 Cell F (Areas 15-17)**

#### **3.6 This cell represents the area of search identified in the draft RSS for an urban extension to Bath. Despite being outside the Cotswold AONB the environmental impact of development at Odd Down, Haycombe or Newbridge would be high.**

- Cell F lies outside the AONB. However, development in any of its 3 sub areas would have a significant negative local impact on a range of environmental objectives pertaining to nature conservation, landscape, the historic environment and the setting of the World Heritage Site.
- The fundamental objective of preventing the coalescence of Bristol and Bath could be compromised by an urban extension in Cell F. Urban extension development in parts of this cell could lead to a danger that Englishcombe and Newton St. Loe might lose their identity as distinct peripheral villages.
- Cell F is marginally weaker than Cells A or B as it does not have significant neighbourhood shopping parade, yet it performs well in terms of accessibility to the city centre by public transport. There is potential for the northern portion of Cell F to benefit from the proposed rapid transit route that will link Newbridge to the city centre.



### ANNEX 3: Assessment of Sustainability of Location (Potential effect on SA objectives)



Very Strong (Significant Positive)



Strong (Positive)

0

Neutral (Neutral)








Weak (Negative)





Very Weak (Significant Negative)





| High Level Objective | Detailed Questions - Does the Development cell? | Assessment of Sustainability | Comment  |
|----------------------|---|------------------------------|--|
| 1: Improve Health    | 1.1 Improve Health                              |                              | <p>Access to sickness treatment services contributes, but health is more than this (see 1.3 'Promote healthy life styles, especially routine daily exercise'). The criterion focuses on the accessibility of the Royal United Hospital in relation to each development cell. Access to GP surgeries is also an important consideration. These are well distributed throughout the existing urban area. It is likely that the provision of a new community medical facility would be a requirement of an urban extension – wherever it is located.</p> <p>Development <b>Cells A-F</b> are equally well located in terms of accessibility to the Royal United Hospital (RUH).</p> |

| High Level Objective | Detailed Questions - Does the Development cell?                    | Assessment of Sustainability   | Comment   |
|----------------------|--|--|---|
|                      | 1.2 Reduce Health inequalities                                     |   | <p>Lower income or other disadvantage should not increase exposure to health risks or reduce access to a healthy lifestyle. The accessibility of health care facilities by public transport, foot and bike is a key issue for those without access to a car.</p> <p>Development <b>Cells A-F</b> are equally well located in terms of accessibility to the Royal United Hospital (RUH).</p>   |
|                      | 1.3 Promote healthy life styles, especially routine daily exercise |  | <p>Sedentary lifestyles and lack of routine basic exercise are one of the main threats to health. Patterns of development should make walking and cycling easy and attractive as routine methods of transport both in terms of getting to the city centre.</p> <p><u>Cycling and Walking Routes</u><br/>           The northern extent of <b>Cell D</b> is in close proximity to the River Avon Trail which runs along the Kennet and Avon Canal. This is part of the national cycle network and presents a 'green route' to the City centre. A new National Cycle Network route has been proposed to link Monkton Combe (southern extent of <b>Cell D</b>) to the River Avon Trail at Locksbrook which is a core employment area in Bath.</p> <p>A new National cycle network route is proposed in <b>Cell C</b>. This would join the cell to the River Avon Trail at Bathampton, again giving good access to the city centre.</p> |


| High Level Objective | Detailed Questions - Does the Development cell? | Assessment of Sustainability  | Comment  |
|----------------------|---|---|--|
|                      |   | <br><br><br> | <p>The northern extent of <b>Cell F</b>, in the Newbridge Area, is in close proximity to the River Avon.</p> <p><b>Cells A, B, and E</b> are less well connected to designated cycling recreational routes, yet cycling remains a viable travel to work option given the relatively compact nature of the city.</p> <p><u>Other Recreational Opportunities</u><br/> The selection of a suitable area for an urban extension should have regard to the opportunities available for the encouragement of healthy lifestyles including access to sporting and other green infrastructure – enabling both formal and informal recreation.</p> <p>The Council has prepared a Green Space Strategy which has, inter alia, mapped and assessed the quality/quantity of the provision of green spaces throughout the existing urban area.</p> <p>In terms of formal green spaces parts of Lansdown (<b>Cell A</b>) and Bathwick/Widcombe (<b>Cell D</b>) are less well provided for than the rest of the city. However, this gap is plugged by the availability of informal green space in these area</p> <p><b>Cells A-F</b> all present good options for formal and informal recreation.</p> |







| High Level Objective                           | Detailed Questions - Does the Development cell?                        | Assessment of Sustainability   | Comment  |
|--|--|--|--|
|  |  |  |  |
| 2: Support Communities that meet peoples needs | 2.1 Help make housing available for everyone                           | N/A  | <b>Cells A-F</b> should equally capable of addressing this objective   |
|  | 2.2 Give everyone Access to learning, training, skills, and knowledge. | <br><br><br> | <p>Accessibility to local schools – primary and secondary – is central to the maintenance and revival of local community and to reducing the need to travel. The disposition of schools across Bath in relation to each development cell is a key determinant of its sustainability. The disposition of further and higher educational facilities is also a consideration.</p> <p><u>Secondary Schools and Further Education</u></p> <p>The south western extent of <b>Cell A</b> benefits from its proximity to Oldfield School (Girls only 11-16, Mixed 6<sup>th</sup> Form). The independent institutions of Kingswood School and Royal High School, located on the south eastern boundary also present an option. However, for boys, mainstream secondary education in lies further afield at St. Marks CE Secondary School (Co-educational 11-16).</p> <p>The southern extent of <b>Cell B</b> benefits from its proximity to St. Marks CE Secondary School (Co-educational 11-16). The independent institutions of Kingswood School and Royal High School, located on the south western boundary also present an option. The City of Bath College would cater for post 16 education.</p> |



| High Level Objective | Detailed Questions - Does the Development cell? | Assessment of Sustainability  | Comment   |
|----------------------|---|---|---|
|                      |   | <br><br><br><br><br><br> | <p><b>Cell C</b> is less well located with regard to accessibility to a secondary school. Demand in Batheston is likely to be met at St. Marks CE Secondary School (Co-educational 11-16). The City of Bath College would cater for post 16 education.</p> <p>The south western extent of <b>Cell D</b> benefits from its proximity to Ralph Allen School (Co-educational 16-18). Further south lies the independent Monkton Combe School. To the north west is King Edwards School (Co-educational 3-18), also independent.</p> <p><b>Cell E</b> is served by St Gregory's Catholic School (Co-educational 11-16). Ralph Allen School (Co-educational 16-18) and Culverhay Secondary School (Boys only 11-18) are also within walking distance.</p> <p>The eastern extent of <b>Cell F</b> benefits from its proximity to Culverhay Secondary School (Boys only 11-18) and St Gregory's Catholic School (Co-educational 11-16). Non-denominational secondary education for girls is available at Ralph Allen School and Oldfield School, though these are less conveniently located.</p> <p><u>Primary Schools</u><br/>An urban extension of the scale proposed in the Draft SW RSS will generate a need for a new primary school (on-site). The relationship of each cell to existing primary schools is therefore not such an important consideration.</p> |

| High Level Objective | Detailed Questions - Does the Development cell? | Assessment of Sustainability | Comment  |
|----------------------|---|------------------------------|--|
|                      |   |                              | <p><u>Further Education</u><br/>Some of the city's secondary schools have their own sixth form, others do not. For those that do not the City of Bath College is an option. This is located on the edge of the city centre. Thus, accessibility to the city centre by public transport is an important consideration (see assessment under 4.4)</p> <p><u>Higher Education</u><br/>Bath has two higher education institutions. Bath University (<b>Cell D</b>) and Bath Spa University (<b>Cell F</b>).</p>  |
|                      | 2.3 Reduce crime and fear of crime.             | <b>N/A</b>                   | <b>Cells A-F</b> are equally capable of addressing this objective  |
|                      | 2.4 Promote stronger more vibrant communities   |                              | <p>Patterns of development that allow people to meet more needs within local communities and reduce the need to travel are more sustainable. Criterion 2.4 covers a lot of ground. Rather than present a generalised picture, the appraisal focuses on some of the individual elements that come together make a strong community.</p> <ul style="list-style-type: none"> <li>• See comments under 1.3 for access to recreation</li> <li>• See comments under 2.2 for access to schools</li> <li>• See comments under 3.1 for access to places of work</li> <li>• See comments under 4.3 for access to local services</li> </ul> |

| High Level Objective                                    | Detailed Questions - Does the Development cell?   | Assessment of Sustainability   | Comment  |
|---|---|--|--|
|   | 2.5 Increase access to participation in cultural activities                             |  | <p>Bath's 'cultural offer' is largely to be found in its historic core. Access to the city centre via public transport is therefore a key determinant of the relative sustainability of each development cell.</p> <ul style="list-style-type: none"> <li>• See comments under 4.4 for accessibility to the city centre by public transport</li> </ul>   |
| 3: Develop the economy in ways that meet people's needs | 3.1 Give everyone in the region access to satisfying work opportunities, paid or unpaid |  | <p>The availability of employment in relation to a development cell is an important consideration.</p> <p><u>Major, City Centre Employment Opportunities</u><br/>A broad range of employment opportunities are located in the city centre. A key issue is therefore the relative accessibility of the town centre from each cell, via a range of transport options.</p> <p><b>Cells A-F</b> all perform equally well in this regard, although there is some variation in terms of accessibility to the city centre by public transport (see 4.4)</p> <p><u>Minor, Local Employment Opportunities</u><br/>There are also secondary concentrations of employment in the city that may have a bearing on the relative sustainability of a development cell. These are assessed below.</p> |





| High Level Objective | Detailed Questions - Does the Development cell?           | Assessment of Sustainability   | Comment  |
|----------------------|---|--|--|
|                      |   | <br><br><br><br><br> | <p>The MoD offices at Lansdown lie on the boundary between <b>Cell A</b> and <b>Cell B</b>. Employment also available at the Royal United Hospital</p> <p><b>Cell C</b> lacks significant local employment opportunities. A higher proportion of residents may therefore seek employment in the city centre, or commute further afield.</p> <p><b>Cell D</b> is characterised by the presence of the University of Bath Campus and its proximity to MoD Foxhill and MoD Warminster Road</p> <p><b>Cell E</b> also lies close to MoD Foxhill.</p> <p><b>Cell F</b> lies close to a proposed development of B1 office space at Rush Hill.</p> <p><u>Conclusion</u></p> <p>Given the weight that should be given to major, city centre opportunities <b>all cells</b> are rated very strongly</p> |
|                      | 3.2 Help everyone afford a comfortable standard of living |  | <p>This can achieved by reducing cash costs e.g. need to travel</p> <ul style="list-style-type: none"> <li>• See comments under 1.3 for access to recreation</li> <li>• See comments under 2.2 for access to schools</li> <li>• See comments under 3.1 for access to places of work</li> <li>• See comments under 4.3 for access to local services</li> </ul>  |



| High Level Objective | Detailed Questions - Does the Development cell? | Assessment of Sustainability | Comment  |
|----------------------|---|------------------------------|--|
|                      |   |                              | <ul style="list-style-type: none"> <li>• See comments under 4.4 for accessibility to the city centre by public transport</li> </ul>  |
|                      | 3.3 Reduce poverty and income inequality        |                              | <p>This can be achieved by reducing the disadvantage caused by not being able to afford a car.</p> <ul style="list-style-type: none"> <li>• See comments under 1.3 for access to recreation</li> <li>• See comments under 2.2 for access to schools</li> <li>• See comments under 3.1 for access to places of work</li> <li>• See comments under 4.3 for access to local retail services</li> <li>• See comments under 4.4 for accessibility to the city centre by public transport</li> </ul> |
|                      | 3.4 Meet local needs locally                    |                              | <p>This can be achieved by reducing need to travel to key services and facilities</p> <ul style="list-style-type: none"> <li>• See comments under 1.3 for access to recreation</li> <li>• See comments under 2.2 for access to schools</li> <li>• See comments under 3.1 for access to places of work</li> <li>• See comments under 4.3 for access to local retail services</li> <li>• See comments under 4.4 for accessibility to the city centre by public transport</li> </ul>              |
|                      | 3.5 Increase                                    |                              |  |

| High Level Objective  | Detailed Questions - Does the Development cell?   | Assessment of Sustainability | Comment  |
|---|---|------------------------------|--|
|   | circulation of wealth within the region   | N/A                          | Not applicable   |
|   | 3.6 Harness the economic potential of the coast in a sustainable way                        | N/A                          | Not applicable   |
|   | 3.7 Reduce vulnerability of the economy to climate change and harness opportunities arising | N/A                          | Not applicable   |
| 4: Provide access to meet people's needs with least damage to communities and the | 4.1 reduce the need/desire to travel by car   |                              | <p>Patterns of development that allow people to meet more needs within local communities and reduce the need to travel are more sustainable.</p> <ul style="list-style-type: none"> <li>• See comments under 1.3 for access to recreation</li> <li>• See comments under 2.2 for access to schools</li> <li>• See comments under 3.1 for access to places of work</li> <li>• See comments under 4.3 for access to local retail services</li> <li>• See comments under 4.4 for accessibility to the city centre by public transport</li> </ul> |




| High Level Objective | Detailed Questions - Does the Development cell?                       | Assessment of Sustainability | Comment   |
|----------------------|---|------------------------------|---|
| environment          |   |                              |   |
|                      | 4.2 Reduce the need to travel by air                                  | N/A                          | <b>Not applicable</b>   |
|                      | 4.3 Help everyone access basic services easily, safely and affordably |                              | <p>The focus of the criterion is the availability and accessibility of local retail facilities (one aspect of basic service provision).</p> <ul style="list-style-type: none"> <li>• See comments under 1.3 for access to recreation</li> <li>• See comments under 2.2 for access to schools</li> <li>• See comments under 3.1 for access to places of work</li> <li>• See comments under 4.4 for accessibility to the city centre by public transport</li> </ul> <p><b>Retail and Other Local Services</b></p> <p>Bath currently has 3 large supermarkets (listed below) that serve the resident population. These are;</p> <ul style="list-style-type: none"> <li>• Waitrose, City centre (city centre)</li> <li>• Sainsbury's, Green Park Station (edge of centre)</li> <li>• Morrison's, London Road (out of centre)</li> </ul> |

| High Level Objective | Detailed Questions - Does the Development cell? | Assessment of Sustainability  | Comment  |
|----------------------|---|---|--|
|                      |   | <br><br><br> | <p>Bath city centre is a major shopping destination. Retail activity is primarily focused in the central shopping area, which lies within the wider City centre. The central shopping area serves the convenience and comparison shopping needs of the local population and is a regional retail and leisure centre. As such it contains local needs shops, national comparison multiples and a range of small independent specialist shops.</p> <p>Bath also contains a number of local neighbourhood centres, which provide for the day to day and top-up shopping needs. These centres vary in size and significance according to their location.</p> <p>The existing neighbourhood centres to which each development cell would have some relation are:</p> <p><b>Cell A</b> – High Street, Weston</p> <p><b>Cell B</b> – Fairfield Road, Fairfield Park and St Saviours Road Larkhall. Also relatively accessible to the out of centre supermarket on the London</p> <p><b>Cell C</b> – High Street, Batheaston</p> <p><b>Cell D</b> – Bradford Road, Coombe Down</p> |

| High Level Objective | Detailed Questions - Does the Development cell?                           | Assessment of Sustainability   | Comment  |
|----------------------|---|--|--|
|                      |   | <br><br> | <p><b>Cell E</b> - Glass House Tesco. A site is also allocated in the Local Plan at St Martin's Garden Primary School for convenience floorspace to meet local needs.</p> <p><b>Cell F</b> – Southdown, Odd Down</p>   |
|                      | 4.4 Make public transport, cycling and walking easier and more attractive |  | <p>The disposition of bus routes and stops, and safe attractive and direct routes for cyclists and walkers is a key consideration. Patterns of development that support their use, e.g. short distances to local services, concentration of amenities in town centres served by radial bus routes are important as is the improvement of urban, inter-urban and rural public transport services. The focus of this criterion is accessibility to the city centre, particularly by bus.</p> <p><u>Public Transport</u><br/>The suburbs of Bath are well served by existing bus routes that connect all areas of the city to its centre. No particular development cell appears to be more or less sustainable in this respect – provided that existing routes can be extended as required.</p> <p>The '<u>Great Bristol Bus Network</u>' and the '<u>Bath Package</u>', a bid for DfT Funding which flows from the Joint Local Transport Plan 2006-2011, comprises a number of improvement schemes designed to increase the usage of public transport. A number of these schemes will have implications for the sustainability of the development cells that are being appraised.</p> |

| High Level Objective | Detailed Questions - Does the Development cell? | Assessment of Sustainability | Comment  |
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|                      |   |                              | <p>A number of <u>Showcase Bus Routes</u> are proposed that would provide quicker and more reliable journeys. Showcase standards are proposed for services:</p> <p>14 (Royal United Hospital)<br/> 10 (Southdown)<br/> 5 (Twerton)<br/> 6/7 (Larkhall and Fairfield Park)<br/> 2/4 (Lansdown, Bathampton and Coombe Down)<br/> 16/17 (Weston, Whiteway, Oldfield Park and Kingsway)</p> <p>Route 13 (Fox Hill and St Martin's Hospital to city centre and Batheaston / Bathford) already benefits from a number of priority measures implemented in the first LTP period but will benefit from the implementation of real time information.</p> <p>A proposed <u>Bus Rapid Transit System</u> will provide state-of-the art public transport in Bath. It will replace conventional buses on the busiest routes. The construction of a busway along a disused railway line will provide a segregated route from a proposed new park and ride at Newbridge to the city centre, passing through the bath Western Riverside regeneration area and Green Park. It will continue to the historic core of Bath and extend eastwards along the A4 London road to Batheaston and Bathford and another proposed new park and ride at Lambridge.</p> <p><u>New and Expanded Park and Ride</u></p> |


| High Level Objective | Detailed Questions - Does the Development cell? | Assessment of Sustainability  | Comment  |
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|                      |   |  | <p>The scheme will provide a new 800-space park and ride site on the east of the city at Lambridge. This will serve traffic from the A46 and M4 motorway and the A4 and the west Wiltshire towns. Capacity will also be increased at the existing sites at Lansdown to the north of Bath, and at Odd Down to the south.</p> <p>A new larger park and ride is proposed at Newbridge in association with the Rapid Transit scheme described above. This will provide up to 1000 spaces, significantly increasing long stay parking capacity for traffic from the west. Rapid transit vehicles would link the park and ride to the city centre and to Lambridge.</p> <p><u>Designated Cycling and Walking Routes</u></p> <p>The northern extent of <b>Cell D</b> is in close proximity to the Avon Walkway which runs along the Kennet and Avon Canal. This is part of the national cycle network and presents a 'green route' to the City centre. A new National Cycle Network route has been proposed to link Monkton Combe (southern extent of <b>Cell D</b>) to the Avon Walkway at Locksbrook which is a core employment area in Bath.</p> <p>A new National cycle network route is proposed in <b>Cell C</b>. This would join the cell to the Avon Walkway at Bathampton, again giving good access to the city centre.</p> <p>The southern extent of <b>Cell A</b>, in the Newbridge Area, is in close proximity to</p> |

| High Level Objective | Detailed Questions - Does the Development cell?                   | Assessment of Sustainability                                     | Comment   |
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|                      |   |  | <p>the national cycle network.</p> <p>The northern extent of <b>Cell F</b>, in the Newbridge area, encompasses the River Avon Trail.</p> <p><b>Cells B &amp; E</b> are less well connected to defined recreational routes.</p> <p><b>Cell A</b></p> <p><b>Cell B</b></p> <p><b>Cell C</b> (Proximity to Bus Rapid Transit Route/ National Cycle Network)</p> <p><b>Cell D</b> (Proposed National Cycle Network Link)</p> <p><b>Cell E</b></p> <p><b>Cell F</b> (Proximity to Bus Rapid Transit Route/ National Cycle Network)</p> |
|                      | 4.5 encourage a switch from transporting freight to rail or water | <p>N/A</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> <p>✓</p> | Not Applicable  |



| High Level Objective   | Detailed Questions - Does the Development cell?     | Assessment of Sustainability                               | Comment  |
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| <p><b>5: Maintain and Improve environmental quality and assets</b></p> | <p>5.1 Protect and enhance habitats and species</p> | <p style="text-align: center;"><b>XX</b><br/><b>XX</b></p> | <p><b>The impact of development on nature conservation</b></p> <p>With proximity to a Special Area of Conservation (SAC) designated for horseshoe bat interest an assessment of the likely significant effect upon the bats would be required under the Habitat Regulations which would then inform whether an appropriate assessment was needed. English Nature Report no 174 states a management objective for feeding areas for greater horseshoe bats to “restrain creeping urbanisation into the 3-4 km area around breeding sites by opposing building developments through planning procedures”.</p> <p>Strategic Nature Areas (SNA’s) are identified as the best in the region to conserve, create and connect wildlife habitat at a landscape scale and as such loss of land from the SNA would be difficult to mitigate.</p> <p>Sites of Nature Conservation Importance (SNCI’s) and Local Nature Reserves (LNRs) preclude development unless material factors override their interest, harm to their nature conservation is minimised and compensation of at least equal nature conservation value is made.</p> <p><b>Cell A</b><br/>The cell is largely covered by a Strategic Nature Area (SNA) and contains Sites of Nature Conservation Importance (SNCIs) and Biodiversity Action Plan priority habitats and species including large tracts of species rich grassland.</p> |

| High Level Objective | Detailed Questions - Does the Development cell? | Assessment of Sustainability            | Comment   |
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|                      |   | <p>XX</p> <p>XX</p> <p>XX</p> <p>XX</p> | <p><b>Cell B</b><br/>The cell is largely covered by a Strategic Nature Area (SNA) and contains Sites of Nature Conservation Importance (SNCl)s and Biodiversity Action Plan priority habitats and species including species-rich grassland and broad-leaved woodland. Land outside of the SNA contains further SNCl's while the west of the area lies within 3km of the Bath and Bradford Special Area of Conservation (SAC).</p> <p><b>Cell C</b><br/>The cell is largely covered by a Strategic Nature Area (SNA), is centred around a large Site of Nature Conservation Importance (SNCl)s and contains Biodiversity Action Plan priority habitats and species. The area lies within 2km of the Bath and Bradford Special Area of Conservation (SAC).</p> <p><b>Cell D</b><br/>The cell is largely covered by a Strategic Nature Area (SNA) and contains a mosaic of Sites of Nature Conservation Importance (SNCl)s, ancient woodlands and Biodiversity Action Plan priority habitats and species. The cell contains sites forming part of the Bath and Bradford Special Area of Conservation (SAC) and forms part of the main feeding area for the bats.</p> <p><b>Cell E</b><br/>The cell is largely covered by a Strategic Nature Area (SNA) and contains Sites of Nature Conservation Importance (SNCl)s, ancient woodlands and Biodiversity Action Plan priority habitats and species including species-rich</p> |




| High Level Objective | Detailed Questions - Does the Development cell?   | Assessment of Sustainability  | Comment   |
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|                      |   |  | <p>grassland and broad-leaved woodland. The cell lies within 1km of the Bath and Bradford Special Area of Conservation (SAC) and forms part of the main feeding area for the bats.</p> <p><b>Cell F</b><br/> The cell is partially covered by a Strategic Nature Area (SNA) in the south east corner which also contains 3 ancient woodlands, while a number of Sites of Nature Conservation Importance (SNCIs) are found close to the urban edge together with Biodiversity Action Plan priority habitats and species. The area lies within 3km of the Bath and Bradford Special Area of Conservation (SAC) and key flight corridors for the bats have been identified running through it, focussed mostly in the south-east corner. Carr's wood local nature reserve (LNR) lies in the north–east corner of the cell.</p> |
|                      | 5.2 Promote conservation and the wise use of land |   | <p><b>No assessment has been undertaken of the location of the best and most versatile agricultural land.</b></p>   |
|                      | 5.3 Protect and enhance landscape and townscape   |   | <p>Three criteria were assessed in relation to potential development:</p> <ul style="list-style-type: none"> <li>• The impact of development on the landscape character in particular the sense of place, the character area (both the part affected and as a whole) and the quality of the landscape.</li> <li>• The impact of development on visual effects in particular the views from</li> </ul>   |

| High Level Objective | Detailed Questions - Does the Development cell?  | Assessment of Sustainability           | Comment   |
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|                      | <p>This part of the appraisal focuses on landscape and visual impact issues. Townscape issues are considered under 5.5 'Maintain and enhance cultural and historical assets' – given Baths Status as a World Heritage Site</p> | <p>XX</p> <p>XX</p> <p>X</p> <p>XX</p> | <p>with and outside the area, the impact on skylines and approaches and the overall conspicuousness of development</p> <ul style="list-style-type: none"> <li>The potential for mitigation of possible development</li> </ul> <p>The appraisal is supported by 'Rural landscapes of Bath &amp; North East Somerset – A Landscape Character Assessment' SPG</p> <p><b>Cell A (Area 1) Outside AONB</b><br/>Within AONB. High Landscape and visual impacts. Low potential for mitigation</p> <p><b>Cell A (Area 2)</b><br/>Within AONB. High Landscape and visual impacts. The potential for mitigation would be low.</p> <p><b>Cell A (Area 3i &amp; ii)</b><br/>Within AONB. High Landscape impacts on the upper slopes (3ii) and medium on the lower slopes (3i). High visual impacts on the upper slopes and low to medium for the lower slopes. Potential for mitigation low for the upper slopes and high for the lower slopes</p> <p><b>Cell B (Area 4)</b><br/>Within AONB. Landscape and visual impacts would be high. Low potential for effective mitigation as isolated from the city.</p> |

| High Level Objective | Detailed Questions - Does the Development cell? | Assessment of Sustainability                      | Comment  |
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|                      |   | <p>XX</p> <p>XX</p> <p>XX</p> <p>XX</p> <p>XX</p> | <p><b>Cell B (Area 5)</b><br/>Within AONB. High landscape and visual impacts, low potential for mitigation given the visual prominence of the area.</p> <p><b>Cell B (Area 6)</b><br/>Within AONB. High impact on open rural character. High impact on views. Low potential for effective mitigation given prominence of area. Isolated from the city.</p> <p><b>Cell C</b><br/>Within AONB. High Impact on character and view due to prominence of hillside. Low potential for mitigation</p> <p><b>Cell D (Area 8)</b><br/>Within AONB. High impact on landscape character and views given prominence of sites. Very low potential for mitigating development on prominent slopes.</p> <p><b>Cell D (Area 9)</b><br/>Within AONB. High impact on landscape character. High impact on local views and medium impact on more distant views. It is not possible to mitigate effectively for the loss of the open plateau character.</p> |


| High Level Objective | Detailed Questions - Does the Development cell? | Assessment of Sustainability                               | Comment   |
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|                      |   | <p>XX</p> <p>XX</p> <p>XX</p> <p>XX</p> <p>XX</p> <p>X</p> | <p><b>Cell D (Area 10)</b><br/>Within AONB. High impacts on landscape and views. Low potential to mitigate the loss of this open rural landscape with heavily wooded slopes.</p> <p><b>Cell D (Area 11)</b><br/>Within AONB. High impact on landscape and views due to prominence of hillsides. The potential for mitigation is low given the loss of the well wooded character and rural views.</p> <p><b>Cell D (Area 12)</b><br/>Within AONB. High impact on character of valley which contributes the Bath's special characteristics. High impact on views within and around the valley. Low potential for mitigation due to topography and overlooking of the valley.</p> <p><b>Cell E (Area 13)</b><br/>High impact on landscape character and features. High impact on views. Low potential to mitigate urban development with no connection to the urban area.</p> <p><b>Cell E (Area 14i&amp;ii)</b><br/>14i - Within AONB - High impact on landscape character and hedgerows, high impact on rural views, medium impact on walkers and on adjacent housing. Low potential for mitigation.</p> <p>14ii – Within AONB – Low to medium impact on landscape character. Low visual impact. High potential for mitigating development. Low potential to</p> |

| High Level Objective | Detailed Questions - Does the Development cell?           | Assessment of Sustainability   | Comment   |
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|                      |   | <p style="text-align: center;"><b>XX</b></p> <p style="text-align: center;"><b>XX</b></p> <p style="text-align: center;"><b>XX</b></p> | <p>mitigate significant change of views from footpaths.</p> <p><b>Cell F (Area 15)</b><br/>Outside AONB. Development in this area would have a high landscape and visual impact which could not be fully mitigated due to its prominence on the skyline and the sloping nature of the site. Development would affect the setting of the Cotswold AONB.</p> <p><b>Cell F (Area 16)</b><br/>Outside AONB. Development in this area would have a high landscape and visual impact on the rural Newton Brook valley which could not be fully mitigated due to the distinctive landform.</p> <p><b>Cell F (Area 17)</b><br/>Outside AONB. Development would have a high landscape and visual impact which would be difficult to mitigate due to the areas prominence on the skyline and because of the openness of the landscape. Development would affect the setting of the Cotswold AONB.</p> |
|                      | 5.4 Value and protect diversity and local distinctiveness |  | See 5.3 and 5.5   |

| High Level Objective | Detailed Questions - Does the Development cell?   | Assessment of Sustainability   | Comment   |
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|                      | <p>5.5 Maintain and enhance cultural and historical assets</p> <p>This part of the appraisal focuses on the potential impact of development on The Bath World Heritage Site</p> | <p></p> <p></p> <p></p> | <p><b>Cell A (1,2 &amp; 3)</b><br/> <u>Historic Environment</u><br/> Development of the area could potential have a very damaging effect on any buried archaeological remains, including prehistoric, Roman and Medieval activity and occupation at Lansdown. There are concerns about the visibility of any development and its impact on the setting of Listed Buildings on Lansdown Road and the Bath Main Conservation Area. Possible development in part with full assessment/evaluation of the historic environment and appropriate mitigation</p> <p><b>Cell A (Area 1)</b><br/> <u>World Heritage Site</u><br/> Development in this area would have a <b>high impact</b> on the distinctively rural character of the setting of the WHS and would produce a poorly connected extension to the city, to the detriment of the rural edge of the WHS and the contained character of the city. Development would make the city newly visible to wide areas of the surrounding countryside, and would change the character of the approach to the World Heritage Site. It would be <b>very difficult to mitigate</b> the impacts of development in this area due to the prominence of the area.</p> <p><b>Cell A (Area 2)</b><br/> <u>World Heritage Site</u><br/> Development in this area would have a <b>high impact</b> in the distinctively rural</p> |



| High Level Objective | Detailed Questions - Does the Development cell? | Assessment of Sustainability  | Comment  |
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|                      |   | <p style="text-align: center;">XX</p> <p style="text-align: center;">XX</p> | <p>character of the setting of the World Heritage Site, with the exception of two small fields in the valley bottom. Views from the Cotswolds Way and surrounding countryside would be compromised. Due to the high prominence of this area, particularly from Upper Weston and the Cotswolds Way, it would be very difficult to mitigate development in this area, with the exception of two small fields in the valley bottom. Development in these fields could be connected to existing development and mitigated with planting.</p> <p><b>Cell A (Area 3i)</b><br/> <u>World Heritage Site</u><br/> Further development on the lower slopes immediately adjacent to the urban edge would have a <b>high localised impact</b> (i.e. on loss of local views and loss of rural character) but would have a <b>lesser impact</b> on the character of the World Heritage Site and its setting if: a strong urban edge were maintained; a substantial area of the upper slopes were left with its rural character providing the green setting and skyline for the city; and the development were of a scale and design that integrates it into the local character.</p> <p><b>Cell A (Area 3ii)</b><br/> <u>World Heritage Site</u><br/> Development on the upper slopes would have a <b>high impact</b> on the setting of the World Heritage Site, particularly the green backdrop and skyline which is so characteristic of this part of the World Heritage Site. <b>No mitigation</b> would be <b>possible</b> for development on the upper slopes. Development on the lower</p> |

| High Level Objective | Detailed Questions - Does the Development cell? | Assessment of Sustainability  | Comment  |
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|                      |   |  | <p>slopes should be possible to mitigate due to its close proximity to existing development and the retention of the slopes above as green setting and skyline to the World Heritage Site.</p> <p><b>Cell B (Areas 4,5 &amp; 6)</b><br/> <u>Historic Environment</u><br/> Development of the area could potential have a very damaging effect on any buried archaeological remains, including prehistoric, Roman and Medieval activity and occupation at Lansdown and Charlcombe. There are concerns about the visibility of any development and its impact on the setting of Listed Buildings at Lansdown Road and the Charlcombe and Upper Swainswick Conservation Areas. Rejection recommended on the grounds of negative impact.</p> <p><b>Cell B (Area 4)</b><br/> <u>World Heritage Site</u><br/> Development on the plateau would alter the rural character of this part of the setting of the World Heritage Site and extend the city out away from the bowl in which it sits, thereby newly revealing the urban area to a wide area of countryside. It would be difficult to mitigate against development in this area due to its skyline position and open nature.</p> |

| High Level Objective | Detailed Questions - Does the Development cell? | Assessment of Sustainability  | Comment  |
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|                      |   | <p>XX</p> <p>XX</p> <p>XX</p> | <p><b>Cell B (Area 5)</b><br/> <u>World Heritage Site</u><br/> Development in this area would have a <b>high impact</b> on its rural character and on its role as rural setting to the World Heritage Site. Due to the prominent nature of this sloping area it would not be possible to mitigate against development here, either from impact on the local rural character or on its character as rural setting to the urban World Heritage Site.</p> <p><b>Cell B (Area 6)</b><br/> <u>World Heritage Site</u><br/> Development in this area would have a <b>high impact</b> on its rural character and isolation from the urban area. Development here would also bring the urban edge out further into the countryside and into wider view, particularly from the A46 approach to Bath. It would urbanise the rural setting of the World Heritage Site. It would not be possible to mitigate development in this area due to its high prominence</p> <p><b>Cell C</b><br/> <u>Historic Environment</u><br/> Development of the area could potential have a very damaging effect on any buried archaeological remains, including Prehistoric to Roman finds and medieval field systems. Serious concerns about the visibility of any development in this area and its impact on the setting of Little Solsbury Hill (SAM). Rejection recommended on the grounds of negative impact.</p> |

| High Level Objective | Detailed Questions - Does the Development cell? | Assessment of Sustainability  | Comment  |
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|                      |   | <p>XX</p> <p>XX</p> <p>XX</p> | <p><b>Cell C</b><br/> <u>World Heritage Site</u><br/> Development in this area would have a high impact on this strongly rural natural feature, and would urbanise what is a key natural landmark in a gateway area to the World Heritage Site. This area is not connected to the urban area and development would be very intrusive to the rural setting of the World Heritage Site. It would be very difficult to mitigate development in this area due to its prominence.</p> <p><b>Cell D (Areas 8, 9, 10, 11 &amp; 12)</b><br/> <u>Historic Environment</u><br/> Development of the area could potential have a very damaging effect on any buried archaeological remains in what is a highly significant historic landscape – with monuments recording human occupation for four millennia. There are serious concerns about the visibility of any development in this area and its impact on the settings of Bathhampton Camp (SAM), areas of Ancient Woodland, Claverton Manor (Historic Park and Garden), Listed Buildings and the main Bath Conservation Area. Rejection recommended on the grounds of negative impact.</p> <p><b>Cell D (Area 8)</b><br/> <u>World Heritage Site</u><br/> Development in this area would have a <b>high impact</b> on the rural character of this hillside, and would urbanise this key natural feature that forms a dramatic</p> |


| High Level Objective | Detailed Questions - Does the Development cell? | Assessment of Sustainability   | Comment   |
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|                      |   | <p style="text-align: center;">XXX</p> <p style="text-align: center;">XXX</p> <p style="text-align: center;">XXX</p> | <p>landscape backdrop to this gateway area. It would be very difficult to mitigate development on this prominent hillside.</p> <p><b>Cell D (Area 9)</b><br/> <u>World Heritage Site</u><br/> Development in this area would have a <b>high impact</b> on its rural and isolated character, and would be separated from the existing urban area. It would be <b>very difficult to mitigate</b> against the impact of development in this area due to its rural undeveloped character and isolation from the urban area.</p> <p><b>Cell D (Area 10)</b><br/> <u>World Heritage Site</u><br/> Development in this area would have a <b>high impact</b> on its rural character and would be inappropriate due to its lack of connection to the city. Mitigation would be very difficult in this area due to the prominence of the valley and its rural character, which would be urbanised.</p> <p><b>Cell D (Area 11)</b><br/> <u>World Heritage Site</u><br/> Further development on the edges of Combe Down and Odd Down would extend the spillage of the World Heritage Site out from its landscape bowl and down the outer slopes, increasing the intrusion of urban development on the rural setting of the World Heritage Site. Development in the main Midford Valley would urbanise a distinctive rural environment and would be poorly connected to the existing urban area. It would be <b>very difficult to mitigate</b></p> |

| High Level Objective | Detailed Questions - Does the Development cell? | Assessment of Sustainability  | Comment   |
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|                      |   | <p style="text-align: center;"><b>XX</b></p> <p style="text-align: center;"><b>XX</b></p> | <p>development in this area due to its prominent nature and the incongruity of urban development in a rural environment.</p> <p><b>Cell D (Area 12)</b><br/> <u>World Heritage Site</u><br/> Development in this area would have a <b>high impact</b> on the rural hidden character of this valley, and would be detrimental to the character of the World Heritage Site as an urban site with a very rural feel. The prominent nature of the site, visible to key views from a wide area, would make it <b>very difficult to mitigate</b> the impact of development here.</p> <p><b>Cell E (Area 13 &amp;14)</b><br/> <u>Historic Environment</u><br/> Development of the area could potentially have a very damaging affect on any buried archaeological remains, including known Roman and Prehistoric occupation in the area. There are serious concerns about the visibility of development and its impact on the setting of the Wansdyke (SAM). Previous residential development to the west of the area has placed considerable pressure on the Wansdyke, and lead to serious erosion of the monument. Furthermore, there are concerns about the overall housing density and the impact on the rural setting of the Southstoke Conservation area to the south. Rejection recommended on the grounds of negative impact.</p> <p><b>Cell E (Area 13)</b><br/> <u>World Heritage Site</u></p> |


| High Level Objective | Detailed Questions - Does the Development cell? | Assessment of Sustainability | Comment   |
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|                      |   | <p>XX</p> <p>XX</p>          | <p>Development in this area would have a <b>high impact</b> on the rural character and make the city newly visible to a wide area of countryside, urbanising the area. The development would not visually appear to be part of the city. The prominent nature of this area would make it <b>very difficult to mitigate</b> development here, particularly considering the steep topography.</p> <p><b>Cell E (Area 14i &amp; ii)</b><br/> <u>World Heritage Site</u><br/> With the exception of the southwest corner, development in this area would have medium impact on the rural setting of the World Heritage Site, due to the existing largely urban feel of this section of the city's edge and so long as development stopped before the edge of the plateau had been reached.</p> <p>However, the Scheduled Ancient Monument of the Wansdyke has historically formed a barrier to development of the World Heritage Site in this area, until the neighbouring development at Sulis Meadows. This development has caused extensive physical damage to the Wansdyke due to the pressure of people crossing it inappropriately. Further development along the Wansdyke is likely to have the same effect.</p> <p>Development in the southwest corner of this area would have a high impact on the rural setting of the World Heritage Site, newly revealing the urban form to the surrounding rural landscape.</p> <p>It would not be possible to mitigate development in the southwest corner of</p> |



| High Level Objective | Detailed Questions - Does the Development cell? | Assessment of Sustainability  | Comment  |
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|                      |   | <p data-bbox="638 880 750 938">XX</p> <p data-bbox="638 1216 750 1273">XX</p> | <p data-bbox="875 434 1397 464">this area due to its prominent nature.</p> <p data-bbox="875 507 1980 576">It would be possible to mitigate the impact of development on the eastern side of the site with planting.</p> <p data-bbox="875 619 1980 799">It is highly unlikely that effective mitigation would be achievable against the impact of increased human pressure on the Scheduled Ancient Monument, as well as the further loss of its current rural setting. In addition, crossing the Wansdyke again with development further weakens its historic role as a barrier to urbanisation in this area.</p> <p data-bbox="875 842 1111 873"><b>Cell F (Area 15)</b></p> <p data-bbox="875 877 1173 908"><u>Historic Environment</u></p> <p data-bbox="875 912 1980 1129">Development of the area could potentially have a very damaging effect on any buried archaeological remains, including any bronze Age and Roman occupation/burials along the Fosse Way. The Fuller’s Earthworks buildings, though in a poor condition, could qualify for local listing as significant industrial buildings. There are serious concerns about the visibility of any development and its impact on the setting of the Wansdyke (SAM)</p> <p data-bbox="875 1173 1155 1203"><u>World Heritage Site</u></p> <p data-bbox="875 1208 1980 1348">While there is scope to improve the environment and presentation of this gateway to the city (made untidy by the Park &amp; Ride and Fullers Earth Works site), this could be achieved without development. Also, an urban extension is no guarantee of achieving improvements and brings additional issues of</p> |





| High Level Objective | Detailed Questions - Does the Development cell? | Assessment of Sustainability  | Comment  |
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|                      |   |  | <p>concern.</p> <p>The area lies outside what is essentially a landscape pinchpoint at the entrance to the city and development here will create a largely separated settlement area, rather than a true urban extension. This would disrupt the well defined urban edge to the WHS, bringing the city out into the countryside surrounding the city.</p> <p>The city would become visible to a wide swathe of the surrounding countryside, revealing the city rather than maintaining Bath's character as a hidden city.</p> <p>This would be a <b>negative impact</b> on the integrity of the WHS and its setting, changing its visual and physical character to a detrimental degree.</p> <p><b>Cell F (Area 16)</b><br/> <u>Historic Environment</u><br/> Development of the area could potentially have a very damaging effect on any buried archaeological remains, including the medieval and possible Roman occupation within the assessment area. There are serious concerns about the visibility and views of any development in this area and its impact on the setting of Listed Buildings, Conservation Areas and SAMs at Englishcombe and Newton St.Loe. Rejection recommended on the grounds of negative impact on the setting of the historic environment.</p> |

| High Level Objective | Detailed Questions - Does the Development cell? | Assessment of Sustainability | Comment   |
|----------------------|---|------------------------------|---|
|                      |   | <p>XX</p> <p>XX</p>          | <p><u>World Heritage Site</u><br/>Development in this area would extend the city by a significant degree out of the landscape hollow in which the WHS currently sits. The resulting overspill would reveal the city's edge to a much wider area of landscape, thus significantly changing the character of the edge of the WHS through urbanisation. This would degrade the rural character of the part of the WHS and its setting and would break with the current sharply defined urban edge - a key characteristic of the city at this point.</p> <p>It is hard to identify effective mitigation to avoid the detrimental impact of urbanising this rural landscape, and extending the city further away from the landscape hollow within which it sits. The distinctive and complex landform in this area would make mitigation ineffective.</p> <p><b>Cell F (area 17)</b><br/><u>Historic Environment</u><br/>Development of the area could potentially have a very damaging effect on any buried archaeological remains, including the known Iron Age and Roman occupation of the area. There are serious concerns about the visibility and views of any development in this area and its impact on the setting of Newton Park (Registered Historic Park &amp; Garden) and the rural character of the Newton St Loe Conservation Area.</p> <p><u>World Heritage Site</u></p> |

| High Level Objective | Detailed Questions - Does the Development cell? | Assessment of Sustainability  | Comment   |
|----------------------|---|---|---|
|                      |   |  | <p>Development in this area would extend the city by a significant degree out of the landscape bowl in which the WHS currently sits. The overspill of development at Twerton shows how changed the city edge becomes when development extends down the slopes.</p> <p>The current abrupt change from rural to urban along Whiteway Road, and the landscape containment of the city around Newton Brook would be greatly changed by development in this area, urbanising the rural setting to the WHS, and making the city newly visible to a wide area of surrounding countryside.</p> <p>This area is a very distinctive landscape entrance to the WHS, with the city largely hidden until the point of arrival and the approach dominated by striking rural landscape. Development in this area would have a very detrimental impact on this part of the WHS setting and its character as a main approach and entrance point, and would make the city newly visible to a wide area of countryside.</p> <p>Development would also be physically separated from the urban settlement by the Newton Brook and the caravan park. When viewed from the surrounding countryside and when travelling between the site and Bath, it would appear as a separate settlement rather than an urban extension.</p> |
|                      | 5.6 Reduce vulnerability of                     |   | New development and infrastructure should not be built in areas at risk. The main risk in Bath is the River Avon  |

| High Level Objective                                | Detailed Questions - Does the Development cell?                        | Assessment of Sustainability  | Comment  |
|---|--|---|--|
|   | flooding, sea level rise   |   | <p><b>Cell D</b> - There are areas of fluvial flood risk in cell D where the River Avon runs along its eastern edge following its southward turn. The risk is limited by steep valley sides.</p> <p><b>Cells A-C and E-F</b></p> <p>The primary focus of this criterion is on sustainable design and construction – which is not locationally specific. It also related to reducing the need to travel by car by ensuring accessibility to key services and places of work etc by other modes.</p> <p>This issue is covered by other sustainability objectives. See 2.4.</p> |
| <b>6: Minimise consumption of natural resources</b> | 6.1 Reduce non-renewable energy consumption and 'greenhouse' emissions |   |  |
|   | 6.2 Keep water consumption within local carrying capacity limits       | N/A   | No known strategic water supply issues<br>Cells A-F are equally capable of addressing this objective   |
|   | 6.3 Minimise consumption and extraction of minerals                    | N/A   | Cells A-F are equally capable of addressing this objective   |
|   | 6.4 Reduce waste not put to  | N/A   | Cells A-F are equally capable of addressing this objective   |

| High Level Objective           | Detailed Questions - Does the Development cell?   | Assessment of Sustainability   | Comment  |
|--------------------------------|---|--|--|
|                                | any use<br>6.5 Minimise land, water, air, light, noise and genetic pollution.   |  | This has not been appraised  |
| <b>Role of the Green Belts</b> | Development in cells that lie within the Bristol-Bath Corridor/Gap would cause the most harm to the Bristol-Bath Green Belt, given its primary role of keeping the two cities separate. | <br><br><br><br><br><br><br><br><br><br> | <p><b>Cell A</b> - An urban extension would compromise meeting all five Green Belt objectives. Of particular significance is the purpose of preserving the setting and character of historic towns, preventing neighbouring towns from merging, and safeguarding the countryside from encroachment. The setting of Bath includes the close proximity of the rural historic village of Kelston. The gap between Bath and the village would be threatened by an urban extension in part of area A adversely affecting Kelston's separate identity. <b>The fundamental objective of preventing the coalescence of Bristol and Bath could be compromised by an urban extension in the area.</b></p> <p><b>Cell B</b> - An urban extension would compromise meeting the Green Belt purposes set out in PPG2. Of particular significance is the purpose of preserving the setting and character of historic towns and safeguarding the countryside from encroachment. <i>Whilst not preventing the merging of towns in this area</i>, the Green Belt protects land between Bath and the nearby villages of Lower &amp; Upper Swainswick and Charlcombe. Such villages would be in danger of merging with Bath if an urban extension were developed in this area.</p> |

| High Level Objective | Detailed Questions - Does the Development cell? | Assessment of Sustainability   | Comment  |
|----------------------|---|--|--|
|                      |   | <p style="text-align: center;">✘</p> <p style="text-align: center;">✘</p> <p style="text-align: center;">✘</p> <p style="text-align: center;">✘✘</p> | <p><b>Cell C</b> - An urban extension would compromise meeting the Green Belt purposes set out in PPG2. Of particular significance is the purpose of preserving the setting and character of historic towns and safeguarding the countryside from encroachment. <i>Whilst not preventing the merging of towns in this area</i>, the Green Belt protects land between Bath and the nearby villages of St. Catherine and Batheaston.</p> <p><b>Cell D</b> - An urban extension would compromise meeting the Green Belt purposes set out in PPG2. Of particular significance is the purpose of preserving the setting and character of historic towns and safeguarding the countryside from encroachment. The Green Belt also prevents merging of settlements by protecting land between Bath and Bradford-on Avon and between Bath and nearby villages including Monkton Combe and Claverton. An urban extension would compromise this role and could, depending on location, result in the merging of Bath with Monkton Combe.</p> <p><b>Cell E</b> - An urban extension would compromise meeting the Green Belt purposes set out in PPG2. Of particular significance is the purpose of preserving the setting and character of historic towns and safeguarding the countryside from encroachment. <i>Whilst not preventing the merging of towns in this area</i>, the Green Belt protects land between Bath and nearby villages including South Stoke, Combe Hay and Midford.</p> <p><b>Cell F</b> - An urban extension would compromise meeting all five Green Belt</p> |

| High Level Objective | Detailed Questions - Does the Development cell? | Assessment of Sustainability | Comment   |
|----------------------|---|------------------------------|---|
|                      |   |                              | <p>purposes. Of particular significance is the purpose of preserving the setting and character of historic towns, preventing neighbouring towns from merging, and safeguarding the countryside from encroachment. The setting of Bath includes the close proximity of the rural historic villages of Englishcombe and Newton St Loe which would be in danger of merging with the urban area of Bath. <b>The fundamental objective of preventing the coalescence of Bristol and Bath could be compromised by an urban extension in the area.</b></p> |

## Summary Sustainability Matrix

| High Level Objective                                  | Detailed Criterion   | Cell A   | Cell B | Cell C | Cell D | Cell E | Cell F |
|---|--|--|--------|--------|--------|--------|--------|
| <b>1: Improve Health</b>                              | 1.1 Improve Health   | ✓✓   | ✓✓     | ✓✓     | ✓✓     | ✓✓     | ✓✓     |
|   | 1.2 Reduce Health inequalities   | ✓✓   | ✓✓     | ✓✓     | ✓✓     | ✓✓     | ✓✓     |
|   | 1.3 Promote healthy life styles, especially routine daily exercise     | ✓  | ✓      | ✓      | ✓      | ✓      | ✓      |
| <b>2: Support Communities that meet peoples needs</b> | 2.1 Help make housing available for everyone                           | <b>Cells A-F</b> are capable of addressing this objective  |        |        |        |        |        |
|   | 2.2 Give everyone Access to learning, training, skills, and knowledge. | ✓  | ✓      | 0      | ✓      | ✓✓     | ✓      |
|   | 2.3 Reduce crime and fear of crime.                                    | <b>Cells A-F</b> are equally capable of addressing this objective  |        |        |        |        |        |
|   | 2.4 Promote stronger more vibrant communities                          | <p>Patterns of development that allow people to meet more needs within local communities and reduce the need to travel are more sustainable.</p> <ul style="list-style-type: none"> <li>• See assessment of 1.3 for access to recreation</li> <li>• See assessment of 2.2 for access to schools</li> <li>• See assessment of 3.1 for access to employment</li> <li>• See assessment of 4.3 on access to basic retail services</li> <li>• See assessment of 4.4 for accessibility to the city centre by public transport</li> </ul> |        |        |        |        |        |
|   | 2.5 Increase access to participation in cultural activates             | <ul style="list-style-type: none"> <li>• See assessment of 4.4 for accessibility to the city centre by public transport</li> </ul>   |        |        |        |        |        |



| High Level Objective   | Detailed Criterion  | Cell A  | Cell B | Cell C | Cell D | Cell E | Cell F |
|--|---|---|--------|--------|--------|--------|--------|
| <b>3: Develop the economy in ways that meet people's needs</b> | 3.1 Give everyone in the region access to satisfying work opportunities, paid or unpaid | ✓✓  | ✓✓     | ✓✓     | ✓✓     | ✓✓     | ✓✓     |
|  | 3.2 Help everyone afford a comfortable standard of living                               | This can achieved by reducing cash costs e.g. need to travel <ul style="list-style-type: none"> <li>• See comments under 1.3 for access to recreation</li> <li>• See comments under 2.2 for access to schools</li> <li>• See comments under 3.1 for access to places of work</li> <li>• See comments under 4.3 for access to local services</li> <li>• See comments under 4.4 for accessibility to the city centre by public transport</li> </ul> |        |        |        |        |        |
|  | 3.3 Reduce poverty and income inequality  | Reducing the disadvantage caused by not being able to afford a car can contribute to this <ul style="list-style-type: none"> <li>• See comments under 1.3 for access to recreation</li> <li>• See comments under 2.2 for access to schools</li> <li>• See comments under 3.1 for access to places of work</li> <li>• See comments under 4.3 for access to local retail services</li> </ul>  |        |        |        |        |        |

| High Level Objective   | Detailed Criterion  | Cell A   | Cell B | Cell C | Cell D | Cell E | Cell F |
|--|---|--|--------|--------|--------|--------|--------|
|  | 3.4 Meet local needs locally  | <ul style="list-style-type: none"> <li>See assessment of 1.3 for access to recreation</li> <li>See assessment of 2.2 for access to schools</li> <li>See assessment of 3.1 for access to places of work</li> <li>See assessment of 4.3 for access to other local retail services</li> </ul> |        |        |        |        |        |
|  | 3.5 Increase circulation of wealth within the region  | <b>Not applicable</b>  |        |        |        |        |        |
|  | 3.6 Harness the economic potential of the coast in a sustainable way                            | <b>Not applicable</b>  |        |        |        |        |        |
|  | 3.7 Reduce vulnerability of the economy to climate change and harness opportunities arising     | <b>Not applicable</b>  |        |        |        |        |        |
|  | 4.1 reduce the need/desire to travel by car   | <b>See the assessment of 4.3 and 4.4</b>   |        |        |        |        |        |
|  | 4.2 Reduce the need to travel by air  | <b>Not applicable</b>  |        |        |        |        |        |
|  | 4.3 Help everyone access basic services easily, safely and affordably (local retail facilities) |  | ✓✓     | ✓✓     | ✓      | ✓      | ✓      |
| 4.4 Make public transport, cycling and walking easier and more attractive (getting to the city centre) |   | ✓  | ✓      | ✓✓     | ✓      | ✓✓     |        |
| 4.5 encourage a switch from transporting freight to rail or water                                      |   | <b>Not applicable</b>  |        |        |        |        |        |
| <b>5: Maintain and Improve environmental</b>   | 5.1 Protect and enhance habitats and species  | ✗✗   | ✗✗     | ✗✗     | ✗✗     | ✗✗     | ✗      |
|  | 5.2 Promote conservation and the wise use of land   | <b>Not assessed</b>  |        |        |        |        |        |

| High Level Objective                         | Detailed Criterion   | Cell A                        | Cell B | Cell C | Cell D | Cell E | Cell F |
|--|--|-------------------------------|--------|--------|--------|--------|--------|
| quality and assets                           | 5.3 Protect and enhance landscape and townscape                        | ✗                             | ✗✗     | ✗✗     | ✗✗     | ✗✗     | ✗✗     |
|  | 5.4 Value and protect diversity and local distinctiveness              | See assessment of 5.3 and 5.5 |        |        |        |        |        |
|  | 5.5 Maintain and enhance cultural and historical assets                | ✗                             | ✗✗     | ✗✗     | ✗✗     | ✗✗     | ✗✗     |
|  | 5.6 Reduce vulnerability of flooding, sea level rise                   | ✓                             | ✓✓     | ✓✓     | ✓      | ✓✓     | ✓      |
| 6: Minimise consumption of natural resources | 6.1 Reduce non-renewable energy consumption and 'greenhouse' emissions | Not applicable                |        |        |        |        |        |
|  | 6.2 Keep water consumption within local carrying capacity limits       | Not applicable                |        |        |        |        |        |
|  | 6.3 Minimise consumption and extraction of minerals                    | Not applicable                |        |        |        |        |        |
|  | 6.4 Reduce waste not put to any use                                    | Not applicable                |        |        |        |        |        |
|  | 6.5 Minimise land, water, air, light, noise and genetic pollution.     | Not appraised                 |        |        |        |        |        |
| Role of the Green Belt                       |  | ✗✗                            | ✗      | ✗      | ✗      | ✗✗     | ✗      |

### Summaries of each Development Cell

#### Cell A

|                            |                  |  |
|----------------------------|------------------|--|
| <b>Nature Conservation</b> | Areas 1,2<br>3ii | The SNA, SNCIs and priority habitats would significantly restrict development in this section. Any parcels of land falling outside of their boundaries would need to be assessed in terms of their impacts upon them as well as in terms of the land parcel itself and other |
|----------------------------|------------------|--|

|   |           |  |
|---|-----------|--|
|   |           | priority habits and species.   |
|   | Area 3i   | As above, although the impacts would be less in a small number of fields that are outside the SNA, not containing species-rich grassland, not abutting the SNCI's and with less developed hedgerows.   |
| <b>Landscape and Visual Impacts</b>                 |           | Within AONB. All areas except area 3i high landscape and visual impacts. The potential for mitigation would be low. Area 3i medium landscape impact and low to medium visual impact on the lower slopes with high potential for mitigation   |
| <b>World Heritage Site and Historic Environment</b> | Area 1    | The impact on the rural edge and setting of the WHS would be high. The potential for mitigation is low.  |
|   | Area 2    | The impact on the rural edge and setting of the WHS would be high. The potential for mitigation is low.  |
|   | Area 3    | Development on the upper slopes would have a high impact and would not be able to be mitigated. Development on the lower slopes would have a lower impact and it would be possible to mitigate.  |
| <b>Access to Services and Facilities</b>            | All Areas | Very good access to and availability of healthcare (RUH) and neighbourhood retail services (Weston High Street). Good access to and availability of schools. The southern portion of the land cell could benefit from proposals set out in 'Bath Package' for the establishment of a high quality Rapid Transit Route. |
| <b>Green Belt Purposes</b>                          | All Areas | The fundamental objective of preventing the coalescence of Bristol and Bath could be compromised by an urban extension in this cell.   |
| <b>Others</b>                                       | Area 1    | There are areas of fluvial flood risk along the Avon Valley at the south-western part of the land cell   |

## Cell B

|   |           |   |
|---|-----------|---|
| <b>Nature Conservation</b>                          | All Areas | The SNA, SNCIs and priority habitats would significantly restrict development in this section. Any parcels of land falling outside of their boundaries would need to be assessed in terms of their impacts upon them as well as in terms of the land parcel itself and other priority habits and species. |
| <b>Landscape and Visual Impacts</b>                 | All Areas | Within AONB. Landscape and visual impacts would be high. Low potential for effective mitigation given the visual prominence of the area and generally isolated location from the city.  |
| <b>World Heritage Site and Historic Environment</b> | Area 4    | The impact on the rural character of this part of the WHS and its setting, particularly the approach to the city, would be difficult to mitigate. Any development here would be isolated from the urban area.   |
|   | Area 5    | High impact on the rural character and on its role as rural setting to the WHS.   |
|   | Area 6    | High impact on rural setting of WHS which would not be possible to mitigate.  |
| <b>Access to Services and Facilities</b>            | All Areas | Benefits from existing Park & Ride site and associated bus route at Lansdown<br>Good access to neighbourhood retail services in Larkhall and closer to major supermarket than other locations.  |
| <b>Green Belt Purposes</b>                          | All Areas | Whilst Lower & Upper Swainswick and Charlcombe could lose their separate identity, the separation of Bristol and Bath would be maintained.  |

## Cell C

|   |        |  |
|---|--------|--|
| <b>Nature Conservation</b>                          | Area 7 | The SNA, SNCIs and priority habitats would significantly restrict development in this section. Any parcels of land falling outside of their boundaries would need to be assessed in terms of their impacts upon them as well as in terms of the land parcel itself and other priority habits and species. Additional consideration would need to be given to the effects of any development on the foraging bats associated with the nearby SAC. |
| <b>Landscape and Visual Impacts</b>                 | Area 7 | Within AONB. High Impact on character and view due to prominence of hillside. Low potential for mitigation   |
| <b>World Heritage Site and Historic Environment</b> | Area 7 | High impact on the areas rural character and the role of Little Solsbury Hill as a strong natural gateway landmark to the WHS  |
| <b>Access to Services and Facilities</b>            | Area 7 | The Bath Rapid Transport route proposed in the Bath Package extends as far as Lambridge, at the south east corner of the land cell, which would provide for improved public transport accessibility in this location. The cell performs relatively poorly in terms of access to education, local employment opportunities and local retail facilities  |
| <b>Green Belt Purposes</b>                          | Area 7 | Whilst St. Catherine and Batheaston and could lose their separate identity, the separation of Bristol and Bath would be maintained.  |

## Cell D

The National Trust own significant land in this area all of which is thought to be inalienable. It has therefore been excluded from the assessment

|   |                 |  |
|---|-----------------|--|
| <b>Nature Conservation</b>                          | Areas 8-12      | The SNA, SNCIs and priority habitats would significantly restrict development in this section. Any parcels of land falling outside of their boundaries would need to be assessed in terms of their impacts upon them as well as in terms of the land parcel itself and other priority habits and species. Additional consideration would need to be given to the effects of any development on the foraging bats associated with the nearby SAC. |
|   | All Areas       | Within AONB. High impact on landscape character and views given prominence of sites. Low potential for mitigating development.   |
| <b>World Heritage Site and Historic Environment</b> | Area 8          | Development would have a high impact on the character of this area as part of the rural setting to the WHS and would be very difficult to mitigate.  |
|   | Area 9          | Development in this area would have a high impact on its character as part of the rural setting to the WHS and would be very difficult to mitigate   |
|   | Area 10         | Development would have a high impact on the character of this area and would be very difficult to mitigate against.  |
|   | Area 11         | Development would have a high impact on the character of this area and its separation from the existing urban area. The potential for mitigation is low.   |
|   | Area 12         | Development would have a high impact on the essential rural character of this part of the WHS and would be very difficult to mitigate against.   |
| <b>Access to Services and Facilities</b>            | Areas 8, 9 & 10 | Development in the northern extent of Cell D (Areas 8, 9 and 10) i.e. a northern extension of Bathampton Village would be isolated from significant local facilities, and some distance from publicly funded secondary education   |
|   | Area 11         | Development in the Midford Valley is far removed from any concept of a sustainable urban extension. Rather, development would could potentially swamp the village  |
| <b>Green Belt</b>                                   | All Areas       | Whilst Monkton Combe could lose its separate identity, the separation of Bristol and Bath would  |

|                 |  |                |
|-----------------|--|----------------|
| <b>Purposes</b> |  | be maintained. |
|-----------------|--|----------------|



**Cell E**

|  |                            |   |
|--|----------------------------|---|
| <p><b>Nature Conservation</b></p>                          | <p>All Areas</p>           | <p>The SNA, SNCIs and priority habitats would significantly restrict development in this section. Any parcels of land falling outside of their boundaries would need to be assessed in terms of their impacts upon them as well as in terms of the land parcel itself and other priority habits and species. Additional consideration would need to be given to the effects of any development on the foraging bats associated with the nearby SAC.</p>   |
| <p><b>Landscape and Visual Impacts</b></p>                 | <p>All Areas</p>           | <p>Within AONB All areas except 14 ii high impact on landscape character and features. High impact on views. Low potential to mitigate urban development with no connection to the urban area. Area 14 ii low to medium impact on landscape character. Low visual impact. High potential for mitigating development. Low potential to mitigate significant change of views from footpaths</p>   |
| <p><b>World Heritage Site and Historic Environment</b></p> | <p>Area 13<br/>Area 14</p> | <p>Development would have a high impact on the character of the WHS setting. It would be very difficult to mitigate against</p> <p>Development in the south west corner of this area would have a high impact on the rural setting of the WHS and would not be possible to mitigate.</p> <p>Development on the eastern side would have medium impact on the immediate rural setting of the WHS, in that some would be lost, but the impact of this development on the wider rural and geological setting of the WHS (i.e. the slopes down towards and past Southstoke) could be mitigated through screening with planting. Development in this area would have a high impact on the historic role of the Wansdyke as a historic barrier to development of the WHS beyond this point, as well as its management, and effective mitigation is unlikely.</p> |
| <p><b>Access to Services and Facilities</b></p>            | <p>All Areas</p>           | <p>Land to the western extent of the cell would benefit from a good quality bus link between Bath and Norton Radstock and bus services associated with the existing park and ride site.</p>   |

|                            |           |  |
|----------------------------|-----------|--|
| <b>Green Belt Purposes</b> | All Areas | Whilst Southstoke, Combe Hay could lose its separate identity, the separation of Bristol and Bath would be maintained. |
|----------------------------|-----------|--|

**Cell F**

|   |           |   |
|---|-----------|---|
| <b>Nature Conservation</b>                          | Area 15   | Strategic Nature Area, no SNCI coverage, within 3km of the SAC  |
|   | Area 16   | Outside Strategic Nature Area, with SNCI coverage   |
|   | Area 17   | Outside Strategic Nature Area, SNCI immediately adjacent  |
| <b>Landscape and Visual Impacts</b>                 | All Areas | Outside AONB. Development in this area would have a high landscape and visual impact which could not be fully mitigated due to its prominence on the skyline and / or the sloping nature of the site. Development in areas 15 and 17 in particular would affect the setting of the Cotswold AONB.   |
| <b>World Heritage Site and Historic Environment</b> | Area 15   | High Impact on the setting of, approach to and edge of the WHS, significantly altering the character of the area and degrading the city's defined urban edge and abrupt change from rural to urban environment. This cannot be mitigated due to the prominence and character of the area and its awkward relationship to the edge of the city |
|   | Area 16   | High Impact on the setting of, approach to and edge of the WHS, significantly altering the character of the area and degrading the city's defined urban edge and abrupt change from rural to urban environment  |
|   | Area 17   | High Impact on the setting of, approach to and edge of the WHS, significantly altering the character of the area and degrading the city's defined urban edge and openness of the site.  |
| <b>Access to Services and Facilities</b>            | Area 15   | Benefits from good access to primary and secondary schools, sport and community facilities including a surgery, is adjacent to the Odd Down Park and Ride site and adjoins a major bus route into Bath. It is also reasonably close to local shops on Upper Bloomfield Road.  |
|   | Area 16   | This site is adjacent to the residential area of Whiteways and would allow an urban extension in this location to connect easily to the existing facilities and services there.   |
|   | Area 17   | This area is physically separated from the existing facilities at Twerton by the steep sided valley of Newton Brook. This seriously impacts on the potential for easy walking from the site to local facilities. However, the area benefits from a degree of proximity to the existing park and ride route to the city centre.                |

|                            |           |  |
|----------------------------|-----------|--|
| <b>Green Belt Purposes</b> | All Areas | The fundamental objective of preventing the coalescence of Bristol and Bath could be compromised by an urban extension in this cell. |
|----------------------------|-----------|--|