



REGIONAL SPATIAL STRATEGY
Urban Extension Environmental Capacity Appraisal

October 2006
Revision A



BATH & NORTH EAST SOMERSET

Regional Spatial Strategy
Urban Extension Environmental Capacity Appraisal

Revision A:

Changes made since initial issue in September 2006 are the inclusion of Haycombe as an appraisal area.

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Introduction

This document sets out the results of a multi-disciplinary appraisal of environmental and urban design factors affecting possible urban extensions in Bath and North East Somerset. These urban extension areas have been derived from the Draft Regional Spatial Strategy (RSS) published for consultation in June 2006, and are as follows:

- South East Bristol about 6,000 dwellings – Policy SR4 Area of Search B
- South/South West of Bath up to 1,500 dwellings – Policy SR5 Area of Search E

This appraisal identifies potential urban design opportunities and impacts, as well as identifying environmental considerations.

The information contained within this 'Environmental Capacity Appraisal' will, in conjunction with the 'Sustainability Appraisal' and further capacity studies, inform Bath and North East Somerset Council's response to the Regional Spatial Strategy.

Further detailed environmental, social, economic and resource studies will be required at future stages of the RSS and Local Development Framework process to refine these capacity studies. This may reduce the development capacity indicated in this document and could preclude development in some areas.

The working group comprised the following disciplines:

- Urban Design
- Landscape Architecture
- Ecology
- Archaeology & Historic Environment
- World Heritage

This working document comprises:

- Appraisal Summary
- Methodology
- Site Capacity Summary Plans
- Site Appraisals

The areas appraised are:

Bristol

- Hicks Gate
- Whitchurch

Bath

- Odd Down
- West of Twerton
- Haycombe



Map indicating location of appraisal areas, and their relationships to the cities of Bristol to the west and Bath to the East

Appraisal Summary

This summary presents the key findings of the RSS Urban Extension working group following their appraisal of the areas of search. This summary should be read in conjunction with the site appraisals and capacity summary plans. All sites considered for development will require further detailed assessments; this may reduce capacity and could prevent development in some areas.

It should be noted that some impacts such as those concerning hedgerows that are a Priority Habitat are likely to apply to all sites and a more detailed study would be required to assess the impact fully. Mitigation for impact on hedgerows would be required.

Hicks Gate (see map on page 11)

Note: For development at Hick's Gate to function as a sustainable urban extension, it will be essential to work jointly with Bristol City Council (BCC). Inclusion of sites within their boundary would increase the numbers of dwellings and employment provided in this area. BCC will present their own findings affecting areas within the city boundary.

These appraisal areas are located either side of the A4 which is a key approach into the Bristol conurbation. Development in this area offers the opportunity to create a high quality approach to the city. It also has the advantage of nearby primary and secondary schools, existing employment, a Park and Ride site, and a major bus route. Development in this area will require joint working with Bristol City Council if a successful sustainable urban extension is to be achieved.

The area 1a to the south of the A4 is considered to have development potential, subject to further assessments.

The area 1c is considered a possible location for development given the potential positive opportunities which must be balanced with the high landscape and visual impacts:

- Development in parts of this area would have an unacceptably high impact on the distinctive undulating landscape and would urbanise some of the rural area which currently serves to separate Bristol and Keynsham.
- Development would be isolated from the edge of Bristol due to the intervening college and Long Fox Manor flats in their spacious, well 'treed' grounds.
- No known significant historic environment or nature conservation issues, although further assessment may indicate otherwise.
- Appropriate setting would be required to the Historic Garden south of the railway.
- Power lines along the north part of this area will require an appropriate development buffer.

The higher slopes and area 1b are not recommended to be taken forward because:

- Development of the higher part of the ridge and the part of the area close to the Hicks Gate roundabout junction would result in high landscape and visual impacts.

- There is the site of a possible Prehistoric henge monument at Stockwood Lane which should be avoided.
- No known significant nature conservation issues. However, land within Bristol has a local Wildlife Network designation and development would need to retain a wildlife network function.

Whitchurch (see map on page 17)

This area offers the opportunity for significant levels of development. This could include expanding the Whitchurch urban area and the creation of a new urban village attached to the south of Whitchurch. Development should provide opportunities to enhance the quality and quantity of existing facilities and it would also need to provide new facilities and employment opportunities.

Given the levels of growth, development in this area is likely to be dependent on the construction of the potential South Bristol Ring Road.

Given the locational advantages of this area there is scope for development, however this is subject to appropriate consideration of a number of important environmental constraints that relate to this area.

Area 4b is considered to have development potential, subject to further assessments.

Areas 4a and 4c are considered possible locations for development given the potential positive opportunities. These must be balanced with the following environmental impacts:

- The most significant feature of the area is Maes Knoll and the impact on its setting is a key consideration. This is the site of a hill fort and also has remains of the Wansdyke which is thought to be a post Roman defence. Both are Scheduled Ancient Monuments. Maes Knoll is a prominent feature forming a promontory of the Dundry Hills and is important both for views to and from it. The opinion of English Heritage is an important consideration in this respect.
- Development in area 4a would have impacts on the setting of Grade II* Lyons Court Farm and the medieval field pattern at the edge of Whitchurch.
- If the area north of Whitchurch Village (area 4c) is included this would erase the green link and visual separation of Whitchurch and Stockwell by joining the two settlements.
- 2 UK BAP species and 1 habitat of principal importance are recorded for the area. Mitigation may reduce capacity and/or require offsite provision

Areas 4d and 4e are not recommended to be taken forward because:

- From a landscape character and visual point of view area 4d is a key part of the setting of Maes Knoll and therefore should not be considered for development.
- Area 4e is on the skyline and development would impinge visually into the Chew Valley.

Odd Down (see map on page 25)

This appraisal area has the advantage of nearby primary and secondary schools, sports and community facilities including a surgery, is adjacent to the Park and Ride site and adjoins a major bus route into Bath. It is also reasonably close to local shopping facilities on Upper Bloomfield Road.

Despite the benefits of the existing infrastructure and services and the opportunities that this presents, these are outweighed by the following environmental impacts, and it is recommended that this site should not be taken forward:

- The city would become visible from a wide swathe of the surrounding countryside, whereas at the moment it is hidden until the point of arrival. This would be a negative impact on the integrity of the setting of the World Heritage Site, changing its visual and physical character to a detrimental degree.
- The extension of the city at what is essentially a landscape pinchpoint will create a largely separated settlement area, visually disconnected with the existing city.
- The sloping nature of the northern side of the study area, and the long distance views to the area from the surrounding countryside mean that it would not be possible to mitigate, even with planting barriers.
- It would extend the existing compact and clearly defined edge of the city
- Negative impact on the Cotswold AONB, and potential impact on the Wansdyke Scheduled Ancient Monument as well as Prehistoric and Roman activity in the area.
- It is within the main feeding areas and flight corridors for Horseshoe bats associated with the Bath and Bradford-on-Avon Bats Special Area of Conservation (SAC).
- It is within a Strategic Nature Area identified for protection and restoration of habitats within the RSS.

West of Twerton (see map on page 31)

This site is physically separated from the existing facilities in Twerton by the steep sided valley of Newton Brook. This seriously impacts on the potential for easy walking from the site to local facilities bringing into question its suitability as a sustainable urban extension to the city.

Due to the following known significant environmental impacts and the physical separation from Bath including poor links to facilities, it is recommended that this site should not be taken forward. Environmental impacts:

- Development would be beyond the clearly defined edge of the city marked by the Newton Brook SSSI valley and the well 'treed' and dominant landform of Carr's Wood Local Nature Reserve (LNR). To breach this would result in the urbanisation of the landscape setting of the World Heritage Site, and create a visually and physically isolated settlement.
- Known Prehistoric and Roman activity in the area, potential impact on the settings of the Newton St Loe conservation area and Historic Park and Garden.

- There are no known significant nature conservation issues, although further assessment may indicate otherwise.

Haycombe (see map on page 35)

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. Ecological impacts from development could be off set and well mitigated in a well planned and implemented scheme. Such development would however breach the urban edge created by Whiteway Road and start to spill over onto the southern slopes of the hillside, compromising the characteristic containment of the city.

Due to the following summary of known significant environmental impacts, it is recommended that this site should not be taken forward:

- Development in this location will breach the strong edge provided by Whiteway Road, which will work against the 'character of containment' that is an important feature of the city of Bath, and relates to the unique relationship between the built areas and its rural hinterland.
- The resulting overspill would reveal the city's edge to a much wider area of landscape, thus significantly changing the character of the edge and setting of the World Heritage Site through urbanisation.
- Serious concerns about the potential impact on the setting of the Listed Buildings, Conservation Areas and Scheduled Ancient Monuments at Englishcombe and Newton St. Loe.
- The visual impact of development on the vast majority of views would be severe with the loss of the attractive, high quality rural landscape and loss of intricacy.

Next Stages

The information contained within this 'Environmental Capacity Appraisal' will, in conjunction with the 'Sustainability Appraisal', inform Bath and North East Somerset Council's response to the Regional Spatial Strategy. Further work is required for many of the sites contained in the 'Environmental Capacity Appraisal' and the need for this further work should be clearly articulated in the response to the RSS. It is likely that this further work will inform the Local Development Framework.

Methodology

The draft Regional Spatial Strategy produced in 2005 identified broad areas of search on the edges of Bath and Bristol within Bath & North East Somerset that should be investigated for potential for urban extensions.

Through an initial review of the capacity of these areas of search for a potential urban extension (stage 1 studies) these broad areas were refined into four of the specific 'areas of search' that are the subject of this appraisal. Following the undertaking of a Strategic Sustainability Assessment of urban extension options a further area of search at Haycombe was identified for appraisal.

Each area of search was assessed for impact to landscape and visual, ecology, historic environment and World Heritage, and for strategic urban design opportunities and constraints. These assessments included site visits and desktop studies. Each of the disciplines has an individual methodology (given below) and all except urban design were appraised under the following sections:

- Identification of existing conditions;
- Impact assessment;
- Potential for mitigation; and
- Identification of any further work required.

The assessments for each area of search were then jointly considered to decide the overall capacity for development for each area of search. The capacity is expressed graphically on maps as follows:

Red	Areas considered by the group as not appropriate for development because of impacts identified concerning a range of environmental issues and urban design factors. The group recommends that the Council should not consider these areas suitable for an urban extension.
Orange	Areas considered by the group to be questionable for development due to a high impact on at least one significant environmental factor. The group recommends that further work should be carried out to assess the full implications of the impacts if the Council is minded to consider these areas for an urban extension.
Yellow	Areas considered by the group to have the potential to accommodate development with less negative impact on environmental factors and urban design considerations. The group recommends that these areas should be considered for an urban extension subject to further relevant suitability assessments.

The land use budget for the red areas was not calculated as these are considered to be unsuitable for development. The land use budget for the yellow and orange areas was calculated using the following criteria:

Occupancy	2.3 people per dwelling
Employment land	10% of gross site area (unless specific requirements)
Community facilities	0.75ha per 1000 people
Local facilities	100m ² gross per 1000 people and 25% plot ratio
Primary School	2.5ha per 1500 dwellings

Secondary School	10ha for greater than 6000 people or 2500 dwellings
Parks and open space*	0.6 ha per 1000 people
Pitches*	1.6ha per 1000 people

Source: West of England Partnership Office (WEPO)

The remaining land represented the area for housing. To make allowance for incidental open space, gardens, roads serving the development and retained landscape features, the area for housing was multiplied by 80% to give a net development area. A density multiplier of 50dph was then applied to give a potential number of units. The potential population was calculated using 2.3 people per dwelling.

* The figures for parks, open space and pitches will need to be reviewed to take account of the Bath & North East Somerset Green Space Strategy. This may result in the reduction of developable area.

Urban Design

A brief strategic urban design appraisal was undertaken of each area of search. This outlined some of the principal opportunities for new development to link into and make use of the existing infrastructure and facilities within an area: A high level of integration is considered fundamental to achieving a sustainable urban extension. Further work will be necessary for each site, identifying other urban design issues such as character and context, structure, height and massing at a higher level of detail.

Landscape and Visual

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

Three criteria were assessed in relation to potential development:

1. The impact of development on landscape / townscape character in particular the sense of place, the character area (both the part affected and as a whole) and the quality of the landscape.
2. The impact of development on visual effects in particular the views from within and outside the area, the impact on skylines and approaches and the overall conspicuousness of the development.
3. The potential for mitigation of possible development

Each area was surveyed by two Landscape Architects before selecting a representative viewpoint from which to complete an assessment form. A photographic record was made, including photographs taken into the areas from the wider countryside.

Archaeology & Historic Environment

A 'Rapid Desktop Assessment' was carried out for each area consulting the following sources for the Historic Environment:

- Scheduled Ancient Monuments
- Conservation Areas
- Listed Buildings
- Historic Parks and Gardens
- Historic Battlefields
- Sites and Monuments Record
- Historic Landscape Characterisation

This information was used to gain an overview of the known historic environment character and status of each site. The broad impacts of development and options/potential for mitigation were then considered.

World Heritage

The three Bath areas of search were assessed for impact against the outstanding universal values of the World Heritage Site, as identified in the original nomination papers (1986) and the World Heritage Site Management Plan (2003), and against identified characteristics (set out in the assessment tables below) of the landscape around the city as setting to the World Heritage Site.

Nature Conservation

A 'Rapid Desktop Assessment' was carried out for each area consulting:

- Statutory wildlife designations (Sites of Special Scientific Interest (SSSI), Local Nature Reserves (LNR), Special Area of Conservation (SAC), etc);
- Sites of Nature Conservation Importance (SNCI) and Regionally Important Geological Sites (RIG);
- Phase 1 habitat information;
- local wildlife designations (this differs for each authority – e.g. “Wildlife Network” sites for Bristol; bat protection zones for Bath);
- Strategic Nature Areas as identified in the regional spatial strategy and Nature Map;
- Existing / recent records for notable species, with particular reference to Species of Principal Importance; and UK protected and European protected species;
- UK Biodiversity Action Plan (BAP) priority habitats and semi-natural habitat, including rivers and streams, ponds and other water bodies;
- Ancient Woodland Inventory sites;
- BAP and other relevant Project data -different for each authority e.g. hedgerow data; Batscapes data; greater horseshoe bat corridors; proximity to BAP project areas;
- Green infra-structure information as available from aerial photographs and draft Horseshoe Bat Corridor information.

This information was used to gain an overview of the known ecological character and status of each site. The broad impacts of development and options/potential for mitigation were then considered.

Overall Capacity Summary

	No. of Units			Areas for Employment (ha)		
	Yellow Sites	Orange Sites	Total Units	Yellow Sites	Orange Sites	Total Area
Bristol Sites						
Hicks Gate	363	731		1.3	2.9	
Whitchurch	1,596	1,962		5.6	8	
Total	1,959	2,693	4,652	6.9	10.9	17.8
Bath Sites						
Odd Down	-	-		-	-	
West of Twerton	-	-		-	-	
Haycombe	-	-		-	-	
Total	0	0	0	0	0	0
Overall Total	1,959	2,693	4,652	6.9	10.9	17.8
Population @ 2.3ppd	4,506	6,194	10,700			
Approx number of jobs @ 140 jobs/ha				966	1526	2492

Note: For development at Hick's Gate to function as a sustainable urban extension, it will be essential to work jointly with Bristol City Council. Their assessment of the capacity of sites within their boundary will increase the numbers of dwellings and employment provided in this area.

Hicks Gate: Capacity Summary


Hicks Gate - Yellow Area Only			
1 (a)	13	ha	
Total site area	13	ha	
Housing area	9.1	ha	x 80% to give net = 7.3 ha x50dph 363 units
Community facilities	0.6	ha	
Primary school	0	ha	
Secondary school	0	ha	
Local centre	0.1	ha	
Open space*	0.5	ha	
Playing fields*	1.4	ha	
Employment land (10%)	1.3	ha	Population 836 people
Hicks Gate - All Areas			
1 (a)	13	ha	
1 (c)	29	ha	
Total site area	42	ha	
Housing area	27.3	ha	x 80% to give net = 21.9 ha x50dph 1094 units
Community facilities	2.0	ha	
Primary school	2.5	ha	
Secondary school	0	ha	
Local centre	0.15	ha	
Open space*	1.6	ha	
Playing fields*	4.2	ha	
Employment land (10%)	4.2	ha	Population 2515 people
*could form part of on/off site green infrastructure			

After the Heritage and Environment Team carried out their appraisals of each area, summary plans were produced to bring together the various issues. Each area was summarised using the three coloured definitions indicated in the methodology, which is repeated below:

	Areas considered by the group as not appropriate for development because of impacts identified concerning a range of environmental issues and urban design factors. The group recommends that the Council should not consider these areas suitable for an urban extension.
	Areas considered by the group to be questionable for development due to a high impact on at least one significant environmental factor. The group recommends that further work should be carried out to assess the full implications of the impacts if the Council is minded to consider these areas for an urban extension.
	Areas considered by the group to have the potential to accommodate development with less negative impact on environmental factors and urban design considerations. The group recommends that these areas should be considered for an urban extension subject to further relevant suitability assessments.

Hicks Gate

Total area appraised: 88.5ha


North

Red Area 1(b) & 1 (d): 36.5ha

Notes

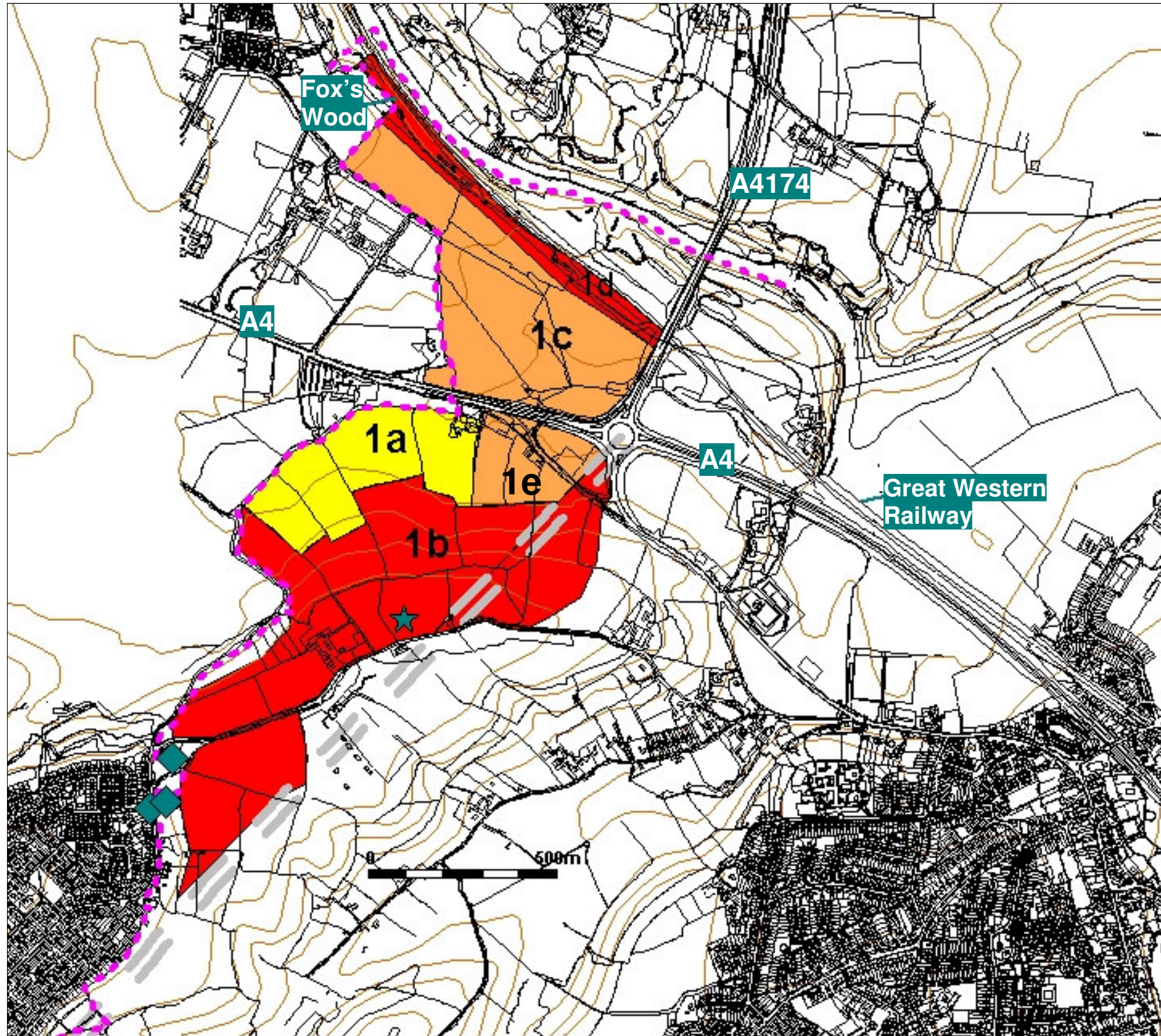
- To be read in conjunction with main report
- Scale bar located on drawing

Indicative line of potential new ring road

District Boundary

★ Historic Sites ◆ Listed Buildings

Hicks Gate: Capacity Summary Plan



Hicks Gate Appraisal

For development at Hick's Gate to function as a sustainable urban extension, it will be essential to work jointly with Bristol City Council (BCC).

Site Overview

Local facilities (distances measured from centre point of site, as the crow flies)

- Local shops – Some in surrounding areas, but provision on site likely to be required.
- Infants School (Broom Hill Infants School) – 2.0km.
- Secondary School (Brislington School) – 1200m.
- Playing field (Brislington School) – 1200m.
- Site is bisected by key bus route between Bristol and Bath.

Urban Design

Opportunities

- Opportunity for a high quality mixed use development, possibly with a significant proportion of employment, providing a high quality approach into Bristol.
- Opportunity to link into existing facilities on the fringes of Bristol e.g. retail, education, Park and Ride, employment. This requires close co-operative working with Bristol City Council.
- Potentially could provide a catalyst for the regeneration of the Trading Estate areas.
- Would potentially require new junction on the A4 as well as convenient and safe pedestrian connections across the road.
- Significant area within Bristol City could be incorporated into any development to achieve a complete urban extension. Joint working will be required to sustain this opportunity.
- Possible ring road in this location will form a strong edge to the Bristol conurbation, separating it from Keynsham and supplying a main artery into the development site.

Limitations

- Park & Ride extension has been identified in Bristol City Council Local Plan.
- Major power lines along north side of area 1c will require development buffer and may preclude residential development within a certain distance.

Landscape & Visual Aspects

Existing Conditions

Hicks Gate North of the A4 (areas 1c and 1d)

This is an Interesting rural landscape with attractive, small scale, complex and varied landform which is undulating especially in the eastern half of the site where a stream winds through the landscape. The land rises gently towards the north eastern part of the site. It is divided into a number of small to medium fields bounded by hedgerows with some walling. There are some significant trees principally along the western boundaries of the site, the northern boundary railway cutting and along the stream with some young trees and shrubs forming dense scrub along part of the A4 boundary. A significant electricity power line runs parallel to the railway line in the northern part of the site. The A4 bounds the site to the south and the A4174 ring road bounds the site to the east. Immediately to the west of the allotted site area within the Bristol boundary, are three properties in large well treed grounds – St Brendan's 6th Form College, Long Fox Manor, and a smaller private house / farm. These form a distinctive, well 'treed' landscape break with the urban edge of Bristol and separate the Hicks Gate North site completely from the City such that it relates more strongly to the rural landscape to the east and south.

The site is viewed from the Hanham Hills to the north which is criss-crossed by well used public rights of way (PROWs); from Hicks Gate Ridge (Stockwood Lane Golf Course Road) to the south; from the A4 immediately to the south and from paths within the site.

From the Hanham Hills the site is very prominent in the extensive southerly views. It has no visual relationship with Bristol except for a small area at the western end of the site where the power line may in any case prevent development. The site area forms part of the important separation between Bristol and Keynsham and this countryside wedge is seen very clearly from this viewpoint.

From Hicks Gate ridge the site is prominent in the middle distance and currently forms part of a rural attractive wide sweeping valley landscape set out below the ridge and marred only by the ring road.

From the A4 where there are significant rush hour periods with very slow moving or stationary traffic with clear views into the site, currently the landscape is rural and the view is dominated by the interesting and attractive undulating landform. There is no visual link with the Bristol conurbation from Hicks Gate ridge or the A4.

Hicks Gate South of the A4 (area 1a, 1b and 1e)

The site comprises low lying rural land at the bottom of the Hicks Gate ridge and the curving slopes of the ridge itself. Land use is principally permanent pasture with small to medium fields and many good hedgerows. Hicks Gate Farm is just off the A4 at the eastern end of the site and a garden centre lies adjacent to the A4 within the Bristol area. There are a number of tree belts, small copses, areas of scrub, and hedgerow trees especially towards the western end of the site within the Bristol area. There is an intermittent but effective tree line along the A4 boundary. Stockwood Lane runs along part of the south western boundary of the site.

The site is viewed in part from Hicks Gate Ridge; from Stockwood Lane; from the A4 and from Hanham Hills, Mount Pleasant and Conham Park all to the north.

Regional Spatial Strategy Urban Extension Environmental Capacity Appraisal

From Hicks Gate ridge the site is largely out of view.

From Hanham Hills etc to the south there are clear views over the area. The eastern end of the site reads as open countryside with Hicks Gate Farm well connected to the countryside to the east and the south. Further to the west the higher ground is visible outside the area and the lower slopes and flatter land behind the garden centre within the Bristol area are well screened by trees both along the A4 and within the site and by the nature of the landform itself.

From the A4 there are frequent glimpses into the area through the intermittent tree screen. Because part of the site is at a lower level than the road, when combined with the roadside tree screen it is not prominent in the view and is well contained visually by the backdrop of the ridge. Towards the eastern end the site is much more prominent in views from the road.

From Stockwood Lane good hedges on the lane side screen the site which is largely set down in a valley. Glimpses are to a verdant rural landscape with good hedgerows and clumps of trees possibly surrounding ponds in places.

Hicks Gate North of the A4 (areas 1c and 1d)

Landscape Impacts

Development would involve loss of the rural character and loss of the distinctive and attractive small scale undulating landform. Development would be isolated from the edge of Bristol due to the intervening college and Long Fox Manor flats in their spacious, well 'treed' grounds and would also break up the rural separation between Bristol and Keynsham.

The impact would be high.

Visual Impacts

From all areas the effect of development is the loss of attractive rural views and, especially when seen both from the higher land to the north and from the Hicks Gate ridge affecting the whole of the much more extensive rural view and urbanising it thus reducing the separation effect of the green belt between Bristol and Keynsham. The site is sufficiently far from the developed edge of Bristol as to bear no visual relation to it.

The impact would be high.

Hicks Gate South of the A4 (areas 1a, 1b and 1e)

Landscape Impacts

Development would involve the loss of the rural character and probably also the verdant hedgerows and tree clumps. Due to the site extending up to the current built edge of Bristol albeit the Park and Ride site, there is a limited connection with the city.

The impact would be high

Visual Impacts

The eastern end and the Hick's Gate Ridge are the visually most prominent part of the site and the most visually integrated with the rural countryside around it. The rest of the site is remarkably well contained visually and provided that the A4 tree screen was maintained in one form or another, development could be accommodated without too much visual impact.

Area 1b and 1e the visual impact would be high

Area 1a the visual impact would be low

Mitigation

Hicks Gate North of the A4 (areas 1c and 1d)

Development would result in the loss of the attractive open landform which could not be effectively mitigated. Likewise it would not be possible to effectively mitigate the impact on wider views, of which this area is a component part, unless development was very low density and landscape planting was very extensive.

Hicks Gate South of the A4 (areas 1a, 1b and 1e)

There are some good hedges and tree clumps in the western part of the site, at least some of these should be retained to form green links through the site. Other mitigation measures are likely to include maintaining and adding to the trees along the A4 and planting a tree belt along the southern boundary up the ridge slope to help prevent any skyline effects of development.

Summary

Hicks Gate North of the A4 (areas 1c and 1d)

The landscape and visual impact would be high. Mitigation would be ineffective unless development was very low density in a well 'treed' parkland setting. It would not be possible to mitigate for the loss of the character of the open landform.

Hicks Gate South of the A4 (areas 1a, 1b and 1e)

Area 1a: The landscape and visual impacts would be moderate. Mitigation would potentially be very effective.

Area 1b and 1e: The landscape and visual impacts would be high. Effective mitigation would be difficult because of the prominence of the area and because of the landform.

Historic Environment

Existing Conditions

- Three Grade II Listed Buildings lie on the western boundary of the appraisal area – St Kenya House, St Kenya House Gates and Stockwood Farm.
- Fox's Wood (Registered Historic Park and Garden) lies within the north-east corner of the appraisal area, adjacent to the railway.
- Within the appraisal area there is evidence of a possible Neolithic henge at Durley Hill, as well as numerous Prehistoric, Roman and medieval findspots and post-medieval boundary markers.
- The Great Western Railway forms the northern boundary of the appraisal area.

Impacts

Development of the area could potentially have a very damaging effect on any buried archaeological remains, including the known Prehistoric and Roman occupation in the area, in particular the possible henge monument at Durley Hill. There are also concerns about the high quality landscape along the Avon Valley and the impact on the setting of Fox's Wood (Registered Historic Park & Garden), and that due regard is given to the setting of the Listed Buildings at Stockwood.

Mitigation

Whilst there is the potential to preserve archaeological sites within open spaces, this requires detailed knowledge of their actual location. The settings of the Foxes Wood and the Listed Buildings could be protected within the development by careful planning around these sites.

Summary

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

Acceptance in principle with full assessment/evaluation of the historic environment and appropriate mitigation.

World Heritage Issues

Not applicable to this site.

Nature Conservation

Existing Conditions

- The northern boundary of this area is immediately adjacent to a site of nature conservation importance (SNCI).
- No records of UK or Local BAP species are recorded for the development area (but little information held).
- The hedgerows within the south west of the area maybe important, but have not been surveyed.

Working information from BCC indicates no statutory designations within the area of search, but does flag up a local plan designation – a local wildlife network over much of the BCC land.

("Wildlife Network" has local plan policy as follows:

NE6 (I) The city's wildlife network will be protected and, where possible, enhanced.

(II) Development on wildlife network sites, as defined on the Proposals Map, will not be permitted unless:

(i) An open corridor is retained which maintains an effective link in the network;

(ii) An open buffer zone which gives effective added protection to any adjoining site of nature conservation interest is retained;

(iii) Habitats or features of identified importance to wildlife are retained and protected from any significant adverse effect;

(iv) The site is shown not to serve or support any substantive wildlife interest, including the necessary function of the wildlife network, as a result of further detailed site assessment;

(III) Development which maintains the integrity of the wildlife network and includes measures to enhance the nature conservation value of remaining open land will be permitted).

Impacts

Potential impacts to species-rich hedgerows – a habitat of principal importance

Potential impacts to adjoining SNCIs

Impacts to BCC wildlife network.

Mitigation

Buffer areas would be required to protect the SNCI sites; retention and enhancements to the wildlife corridor through the site would be required as will protection and retention of key hedgerows.

Summary

Limited information is available, but there would appear to be no significant issues subject to adequate provision of a wildlife corridor and protection of adjacent SNCIs.

Detailed site surveys and impact assessments are required prior to capacity decisions and site design.

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Whitchurch: Capacity Summary

Whitchurch Yellow Area only			
4(b)	56	ha	
Total site area	56	ha	
Housing area	39.9	ha	x 80% to give net = 31.9 ha x 50dph = 1596 units
Community facilities	2.6	ha	
Primary school	0	ha	
Secondary school	0	ha	
Local centre	0.1	ha	
Open space*	2.1	ha	
Playing fields*	5.6	ha	
Employment land (10%)	5.6	ha	Population 3670 people

Whitchurch green and grey areas			
4(b)	56	ha	
4(a)	46	ha	
4(c)	34	ha	
Total site area	136	ha	
Housing area	83.9	ha	x 80% to give net = 67.2 ha x 50dph = 3358 units
Community facilities	5.9	ha	
Primary school	5	ha	
Secondary school	10	ha	
Local centre	0.3	ha	
Open space*	4.7	ha	
Playing fields*	12.6	ha	
Employment land (10%)	13.6	ha	Population 7722 people

*could form part of on/off site green infrastructure

After the Heritage and Environment Team carried out their appraisals of each area, summary plans were produced to bring together the various issues. Each area was summarised using the three coloured definitions indicated in the methodology, which is repeated below:

Red Areas considered by the group as not appropriate for development because of impacts identified concerning a range of environmental issues and urban design factors. The group recommends that the Council should not consider these areas suitable for an urban extension.

Orange Areas considered by the group to be questionable for development due to a high impact on at least one significant environmental factor. The group recommends that further work should be carried out to assess the full implications of the impacts if the Council is minded to consider these areas for an urban extension.

Yellow Areas considered by the group to have the potential to accommodate development with less negative impact on environmental factors and urban design considerations. The group recommends that these areas should be considered for an urban extension subject to further relevant suitability assessments.

Whitchurch

Total area appraised: 280.5ha



North

Total Red Areas: 88.5ha

Notes

- To be read in conjunction with main report
- Scale bar located on drawing

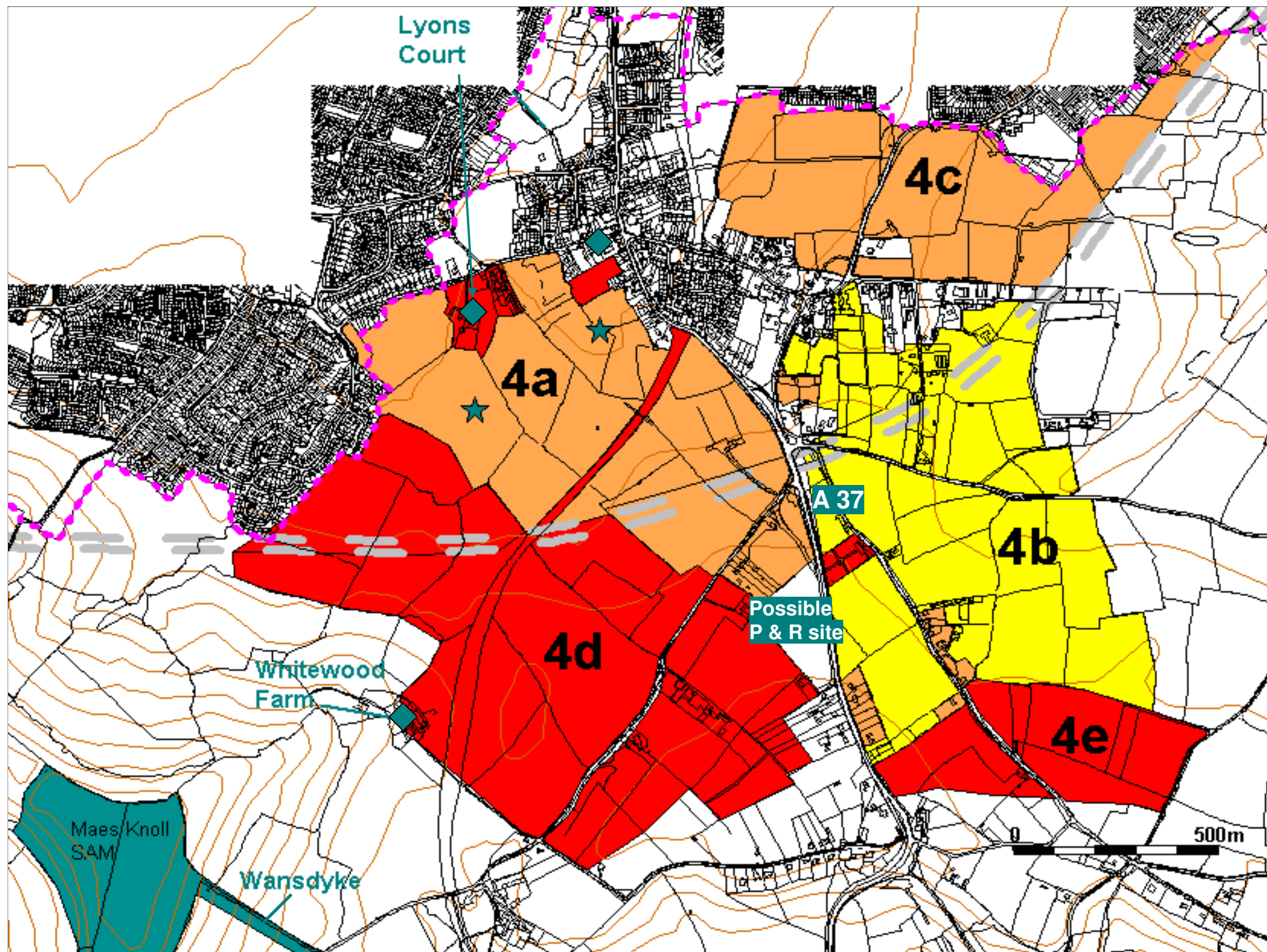
— — — — — Indicative line of potential new ring road

..... District Boundary

★ Historic Sites

◆ Listed Buildings

Whitchurch: Capacity Summary Plan



Whitchurch Appraisal

Site Overview

Local facilities

- Doctor's surgery provided in local centre
- Local shop provided in local centre
- Primary School provided on site
- Secondary School provided on site
- Playing field provided in peripheral areas

Urban Design

Opportunities

- Development in this area offers the opportunity to expand Whitchurch Village in a manner that responds to its local character and also to create a high quality urban extension that is a place in its own right
 - Development in the north of this area could link to Whitchurch Village and create demand for new and improved facilities within the existing centre which itself could be enhanced.
 - Development to the south of the possible South Bristol Ring Road would be beyond the recommended walking distances to Whitchurch centre and therefore could be served by a new local centre to give this area a separate sense of identity.
- Historic field boundaries, hedgerows and trees offer opportunities to give structure and character to the development
- Development will include parks and playing fields (may be scope to double up with existing pitches that require relocation)
- Development will include primary school and secondary school; the latter could serve the wider area if appropriate.
- Development will be visible from Maes Knoll – development will need a strong landscape structure following historic field boundaries within development to break up urban roofscape.
- The disused railway trackbed could provide a green link to countryside
- The setting of Maes Knoll should be respected; conversely views to this significant landscape and historic environment feature will give development a unique sense of place.

Limitations

- Development in this area will require relocation of sports pitches
- Route of possible ring road is conjecture. Level of road relative to adjacent areas will be critical to design solution and connections.
- Development will need to respect settings of St Nicholas Church and Lyons Court Farm – this will determine the location of some areas of open space

Landscape & Visual Aspects

Existing Conditions

Area West of A37 (Areas 4a and 4d)

All areas are part of the Dundry Plateau Character Area and are viewed from and form part of the setting to the Dundry Hills and especially the Maes Knoll hill fort.

Area 4a has medium sized pasture fields (smaller close to old Whitchurch village), bounded by hedgerows. It is gently sloping down to the north. The parish boundary is marked by a hedgerow with trees in part. A long-disused railway line cuts through the area SW to NE marked by scrub with a copse at the northern end. To the north of the area are the Grade II* listed Lyons Court Farm and Church Farm, which presumably both have farmland within the appraisal area. The area is contained to the north, west and east by the urban edge of Bristol, housing estates of the 1970s to '90s principally with much older development in the Whitchurch village area to the east. The A37 runs along the eastern boundary of the area. To the south and south west is open countryside, dominated by Maes Knoll and the end of the Dundry ridge to the south west. Area 4d is similar to area 4a, and adjoins it to the west. As areas 4a and 4d extend further south they relate less well to the city and in some views appear to encroach on the Chew Valley Character Area. Area 4d is clearly seen as part of the landscape setting for Maes Knoll when seen from the hill fort and the site itself.

Areas 4a and 4d are viewed from Maes Knoll, from the A37 and Norton Lane, from internal footpaths, and from the northern urban edge. Views from the urban edge are limited to views from houses along the boundary. There are many footpaths through the site and it is difficult to know how well used they are although the proximity to the urban edge suggest that there is likely to be a high level of use. Views from Maes Knoll are extensive and important given the historical importance of the fort and its popularity for walkers. Currently there is a clearly defined edge to the city to the north, north west and north east with a distinctive rural setting to the hill laid out below and extending into the distance to the east and south. The northern part of area 4a is visually contained by the encroaching city. Views from the A37 and Norton Lane are generally limited by hedgerows and landform.

Area East of A37 (Areas 4b and 4e)

Areas 4b and 4e both lie within the Dundry Plateau Character Area. Although at a much lower level than Dundry Hills this area is still plateau land forming a broad ridge north of the Chew Valley with several narrow tributary valleys cutting into it. Land use is mainly pasture and silage grass fields bounded by hedgerows with occasional hedgerow trees and some tree belts. There are scattered properties close to Whitchurch village and individual and small groups of properties along the lanes and the A37 passing through the area. Most of these date to the 1950s and '60s. Two lanes and the A37 form fan-like ribs through the area joining at Whitchurch. This is an enclosed area except in the area to the north of the northern-most lane where there are extensive views northwards over to the Cotswolds, Wick, Hanham and Keynsham. To the south and south east in Area 4e there is an important skyline marking the border between the Dundry Plateau and Chew Valley Character Areas.

Regional Spatial Strategy Urban Extension Environmental Capacity Appraisal

There are views to the area from Maes Knoll, from Hanham Hills to the north, from the lanes and the A37 and from the various properties and the edge of Whitchurch. The views from Maes Knoll are medium to distant views currently over rural plateau landscape stretching away to the north and east. Those from Hanham Hills are distant views to the skyline. Views from the various roads and properties are limited by vegetation and landform.

Area Between Whitchurch and Stockwood (Area 4c)

This area lies within the Dundry Plateau Character Area and comprises a few pasture fields in poor condition, some scrubby areas used as open space, playing fields and grazing. Hedgerows are mostly in poor condition with dead elm particularly on the west of the Stockwood Road which bisects the area. It is surrounded by development except by a relatively short distance on the eastern side. The area forms a green link which extends into Bristol between Hengrove and Stockwood and provides an important visual and landscape separation between Stockwood and the old village of Whitchurch. For Whitchurch in particular this landscape setting is important to reinforce a sense of place and identity.

There are local views into the site from surrounding properties, from Stockwood Lane and from the numerous paths and open access areas within. There is also an important view from Maes Knoll where the open area supports the identity of Whitchurch village as a distinct settlement.

Landscape Impacts

Area West of A37 (Areas 4a and 4d)

Area 4a

Development would result in the loss of the distinct form of the historic village settlement of Whitchurch and its immediate landscape setting and would result in the loss of the countryside setting of the Grade II* Lyons Court Farm. Both would become subsumed into the more recently developed extensions of Whitchurch. Sensitive development in this area may not impact significantly on the setting to Maes Knoll. The southernmost part of this area is more remote from the city edge and depending on the form and location of the development could have a high landscape impact in part

The landscape impact would generally be moderate

Area 4d

Development would encroach into the landscape setting of Maes Knoll and the southern part would be on a skyline affecting the character of the Chew Valley. Any development in this area would have a major impact on the character of Maes Knoll.

The landscape impact would be high

Visual Impacts

Area 4a

Viewed from Maes Knoll development would result in the loss of the distinctively separate appearance of the historic Whitchurch village, a reduction in the current open landscape context to Maes Knoll and loss of the rural setting to the Grade II* Lyons Court Farm. From the A37 there would be little visual impact except for the southern part where development would be clearly visible. From Norton Lane and internal footpaths the visual impact would inevitably be high.

The visual impact would be moderate to high

Area 4d

From Maes Knoll development would encroach visually up to the base of the hill and the open landscape setting would be lost completely. There would be a significant possibility that development in the southern part of the area would appear on the existing rural skyline seen from the Chew Valley.

The visual impact would be high

Landscape Impacts

Area East of A37 (Areas 4b and 4e)

Development would result in the loss of the rural character over an extensive area of countryside which only links in with the existing edge of Bristol along its northern edge at the village of Whitchurch.

The impact would be high.

Visual Impacts

Area 4b

Although at some distance from Maes Knoll the view would be radically altered given the large extent of the development and the proportion of the attractive rural view which would become urban. This is a negative effect on this view. Views from Hanham are distant and development would be read in a similar way to that at Stockwood. Rural views from the lanes which cross the area would be lost and would become urban in character. Existing properties would lose their rural outlook.

The impact would be moderate to high

Area 4e

This area is on the skyline and development would impinge visually into the Chew Valley. It would be beneficial to maintain some of the open plateau as countryside around Bristol to both contain it visually and to provide an important sense of space around the city. Development would have a high impact on this important setting.

The impact would be high

Landscape Impacts

Area Between Whitchurch and Stockwood (Area 4c)

Although the landscape elements are not of high quality in themselves the key value of this area is as an open green partition between Stockwood and the old village of Whitchurch. This helps to maintain the identity and integrity of Whitchurch and as a green link between open countryside and a tongue of green which extends into Bristol. Development would merge the two settlements to the detriment of the distinct village of Whitchurch and would close this green link. There would also be loss of recreational land.

The impact would be moderate to high

Visual Impacts

The visual effects of development are similar to the effects on landscape character. From Maes Knoll there would no longer be separation between Whitchurch and Stockwood and the two settlements would read as one. From properties and from recreational areas and Stockwood Lane the visual impact would be high even taking into account the partially degraded nature of some of the open area at present. However the area is almost surrounded by development and there is a visual argument for infill here in preference to further intrusion into the countryside.

The impact would be moderate to high.

Mitigation

Area West of A37

Area 4a

Retention of the old railway line and copse of trees is important as is retention of the main hedgerow with trees which in part follows the parish boundary. Boundaries facing onto countryside would need to be maintained as hedgerows with additional buffer planting to protect the setting to Maes Knoll. It would not be possible to mitigate for the loss of the rural setting of Whitchurch village.

Area 4d

It would not be possible to mitigate effectively for any of the impacts of development.

Area East of A37

Area 4b

Careful use of planting, location of new open space and retention of strategic hedgerows both internally, along the A37 and all countryside boundaries could be effective in setting such a large development acceptably into the landscape. The southern part projects into open countryside and therefore particularly sensitive development would be required which would generally exclude bulky residential and commercial units.

Area 4e

Given the distance out into the countryside, the skyline nature of the landform and the need to retain open plateau setting to the City, it is not possible to effectively mitigate development.

Area Between Whitchurch and Stockwood

Area 4c

The size of the area would make it difficult to provide mitigation which would maintain the visual separation and sense of place whilst still allow an economical scale of development. However the provision of high quality open space and a good path network here could be designed to allow the settlements to be “read” as separate communities with their own identity.

The impact would be moderate to high.

Summary

Area West of A37

Areas 4a and 4d

The overall landscape and visual impact of development in area 4a would be moderate with reasonable potential for mitigation of effects given a strong planning lead. Loss of the open rural setting of Whitchurch village and the setting of the Lyons Court Farm would be difficult to mitigate effectively.

The overall landscape and visual impacts in area 4d would be high without the possibility of effective mitigation.

Area East of A37 (Area 4b and 4e)

Area 4b

The overall landscape and visual impact of development here would be moderate with potential for effective mitigation given a strong planning lead.

Area 4e

The overall landscape and visual impact of development here would be high with no possibility of effective mitigation.

Area Between Whitchurch and Stockwood (Area 4c)

The overall landscape and visual impact of development would be moderate to high with only limited potential for mitigation.

Note

References to character areas are taken from the publication:

Bath and North East Somerset Planning Services, Rural Landscapes of Bath and North East Somerset: A Landscape Character Assessment of Bath and North East Somerset: A Landscape Character Assessment

Historic Environment

Existing Conditions

Area south of Whitchurch (4a, b, d & e)

- To the south of this extensive appraisal area, which forms part of their setting, lie Maes Knoll Iron Age hill fort and the Wansdyke Post-Roman linear earthwork (Scheduled Ancient Monuments).
- Queen Charlton Conservation Area lies to the east of the appraisal area, and Whitchurch is being considered in the current Conservation Area reviews
- The appraisal area contains three Listed Buildings – 15th century Lyons Court Farmhouse (Grade II*), Whitewood Farmhouse and a Milestone on Queen Charlton Lane (both Grade II).
- Within Whitchurch there are a further seven Listed Buildings including the medieval St Nicholas Church (Grade II*), which sits on the appraisal area boundary.
- Within the appraisal area there is evidence of Roman occupation at Lyons Court Farm and Newlands, along with medieval ridge and furrow at Hursley Hill.
- Around the medieval settlement of Whitchurch are a series of radiating enclosed fields of medieval or earlier date.
- The former line of the North Somerset Railway runs north-south through the appraisal area.

Area north of Whitchurch Village (4c)

- On the southern boundary of the appraisal area the Sites and Monuments Record holds two records for Manor Farmhouse and Barns.
- The area is comparatively poor in the numbers of items of historic environment interest which suggests that there has been little fieldwork in the area.
- The former line of the North Somerset Railway forms the western boundary of the appraisal area.

Impacts

Area south of Whitchurch (4a, b, d & e)

Development of the area could potentially have a very damaging effect on any buried archaeological remains, including the two known Roman settlements and the medieval field systems around Whitchurch. There are serious concerns about the visibility of development and its impact on wider setting of Maes Knoll and the Wansdyke (Scheduled Ancient Monuments), Lyons Court Farm and St Nicholas Church (Grade II* Listed) and the rural setting of Queen Charlton Conservation Area. English Heritage have been consulted on these issues and their letter is appended.

Area north of Whitchurch village (4c)

Development of the area could potentially have a very damaging effect on any buried archaeological remains, There are concerns that due regard is given to the village setting of the Listed Buildings in Whitchurch.

Mitigation

Area south of Whitchurch (4a, b, d & e)

Whilst there is the potential to preserve some archaeological sites within open spaces, this requires detailed knowledge of their actual location. It may also be possible to protect the field systems on the southern side of Whitchurch along with the settings of the medieval church and

Lyons Court Farm. Likewise it may be possible to limit any impact on the setting of Queen Charlton Conservation Area to the east. However, it is difficult to see how development could not impact on setting of the Scheduled Ancient Monuments. From the summit of Maes Knoll there are clear views of the entire appraisal area, including most of the historic landscape features discussed above – a landscape and monuments spanning almost three millennia.

Area north of Whitchurch Village (4c)

Whilst there is the potential to preserve archaeological sites within open spaces, this requires detailed knowledge of their actual location.

Summary

Area south of Whitchurch (4a, b, d & e)

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

Possible development in part (limiting any development to the area east of the A37 in areas labelled 4c, b and e, with full assessment/evaluation of the historic environment and appropriate mitigation.

Area north of Whitchurch Village (4c)

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

Acceptance in principle with full assessment/evaluation of the historic environment and appropriate mitigation.

World Heritage

Not Applicable to this site.

Nature Conservation

Existing Conditions

- Notable species are recorded within the development area, including Skylark and Brown Hare. These are UK BAP species of Principal Importance, and Local BAP species. (Skylark is classified by RSPB as a Red species - the highest conservation priority, with species needing urgent action).
- The area is associated with species-rich hedgerows These are UK BAP habitats of Principal Importance and local BAP habitats.
- PPS9 states that LAs should conserve species and habitats of principal importance through planning policies and decisions.
- The area includes fields classified as semi-improved neutral grassland. These are of potential value but further studies are required
- The development area includes a small section of Charlton Brook SNCI, and Stockwood Open Space SNCI, which is primarily in the Bristol area.
- The area lies in close proximity to a Strategic Nature Area (RSS designation).

Impacts

At the very least the development would result in the loss of hedgerow (habitat of principal importance) and grassland habitats, with impacts to recorded Brown Hare and Skylark sites (species of principal importance). The development could also result in the damage and disturbance to the Charlton Brook and Stockwood Open Space SNCI.

Mitigation

Where possible all species-rich hedgerows should be protected and retained through open space provision. However, it is unlikely that this approach could achieve full mitigation. Hedgerow translocation and offsite habitat enhancements would therefore be required. The direct loss of habitat used by brown hare and skylark cannot be mitigated. The impacts could be compensated for by habitats improvements and or creation elsewhere, however this approach is largely untested.

Summary

The hedgerow network would need further investigation to identify key hedgerows that should be safeguarded and which may reduce development capacity. Areas for off-site ecological compensation would need to be found.

Detailed site surveys and further impact assessments would be required prior to site design and capacity decisions.

Impacts to species and habitats of principal importance predicted, but measures to mitigate and/or compensate for impacts could be achieved through an innovative approach to off site compensation. It should be noted however, that this approach is largely untested.



View towards Whitchurch from Maes Knoll

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Odd Down: Capacity Summary

Note: As the area is considered to be unsuitable for an urban extension as defined in the key for red areas adjacent, no development capacity is indicated.

After the Heritage and Environment Team carried out their appraisals of each area, summary plans were produced to bring together the various issues. Each area was summarised using the three coloured definitions indicated in the methodology, which is repeated below:

	Areas considered by the group as not appropriate for development because of impacts identified concerning a range of environmental issues. The group recommends that the Council should not consider these areas suitable for urban expansion.
	Areas considered by the group to be questionable for development due to a high impact on at least one significant environmental factor. The group recommends that further work should be carried out to assess the full implications of the impacts if the Council is minded to consider these areas for an urban expansion.
	Areas considered by the group to have the potential to accommodate development with less negative impact on environmental factors and urban design considerations. The group recommends that these areas should be considered for an urban extension subject to further relevant suitability assessments.

Odd Down:

Total area appraised: 26ha

Red Area: 26ha



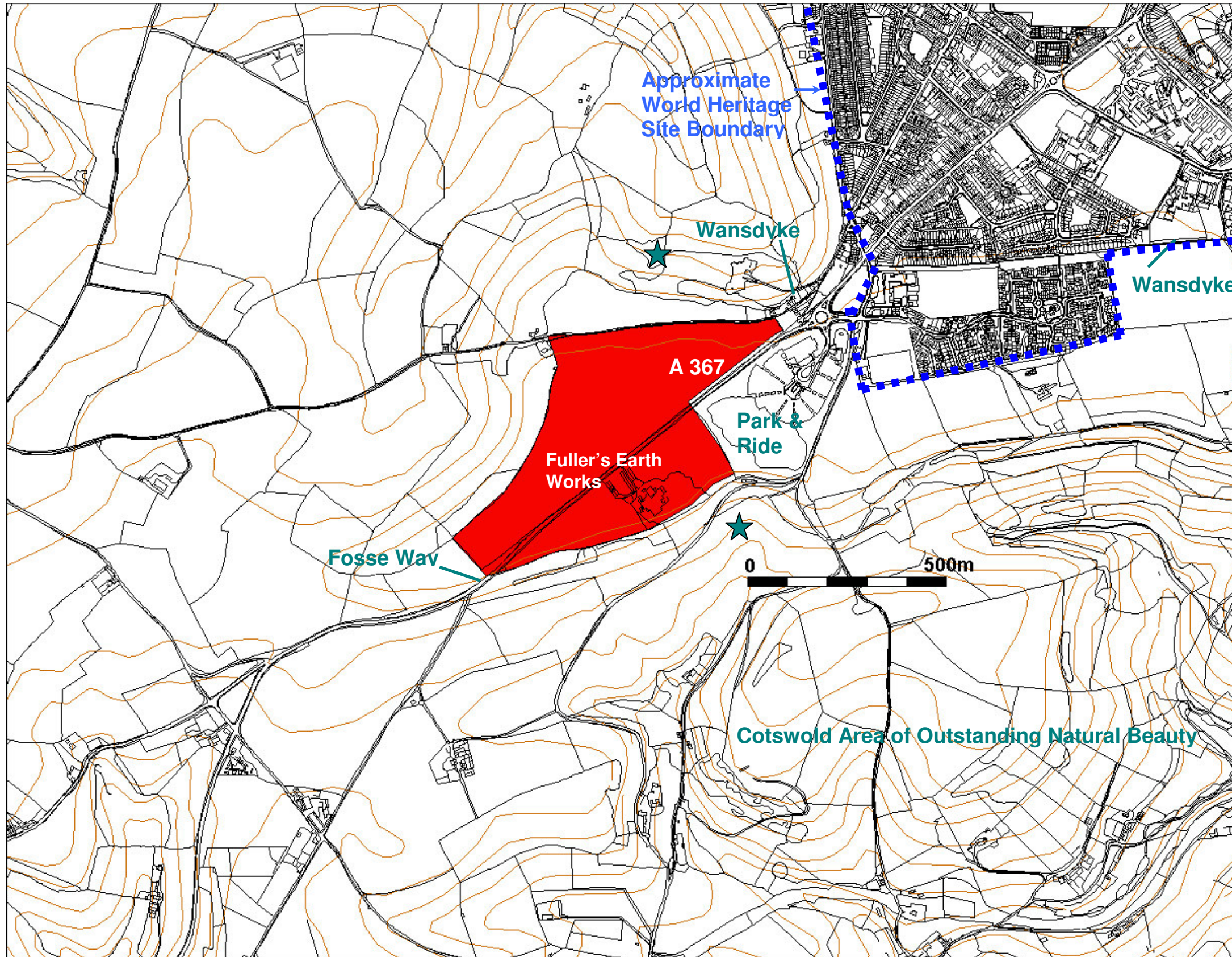
Notes

- To be read in conjunction with main report
- Scale bar located on drawing

★ Historic Sites

◆ Listed Buildings

Odd Down: Capacity Summary Plan



Odd Down (Fuller's Earth) Appraisal

Site Overview

Local facilities (distances measured from centre point of site)

- Doctors' surgery at Sulis Meadows – 800m
- Local shop (Upper Bloomfield Road) – 1000m
- Primary School (St Phillips, Frome Road) – 1.6km
- Secondary School (St Gregory's) – 700m
- Playing field (St Gregory's) – 700m
- Area is apparently well provided for in terms of community halls
- Site is bisected by key bus route into centre of Bath

Urban Design

Opportunities

- Development offers the opportunity to create a new entrance to the city and to improve the Fuller's Earth site.
- Development in this area can make use of existing facilities and services such as St Gregory's secondary school and shops on Upper Bloomfield Road.
- Park and Ride bus service offers frequent links to Bath city centre. It is also on the bus route for travel between Bath and Midsomer Norton/Radstock.
- Green infrastructure could incorporate Tree Preservation Order (TPO) trees and structural open space to break up development areas.

Limitations

- Due to the 'pinchpoint' of the landscape and the location of the Park and Ride site, any development here will read as a separate housing area, rather than as an urban extension. This is despite local facilities being reasonably close.
- Additional planting may be required off site to filter views to the site and to mitigate for nature conservation impacts.
- Site lies adjacent to land for Park and Ride extension

Landscape & Visual Aspects

Existing Conditions

Small tongue of Cotswold plateau edge (within the Cotswold Plateaux and Valleys Character Area) forming a prominent ridge extending south west of the city along the A367. Land uses comprise open arable and the old Fuller's Earth Works site which is now a recycling centre with an adjacent field partly used for bike scrambling to the south of the road. The Fuller's Earth site has some mature trees along the entrance road and also some trees on the south eastern boundary. Hedges border the majority of the fields. The land to the south and east of the area is within the Cotswold Area of Outstanding Natural Beauty (AONB) and is contiguous along part of the appraisal areas southern boundary.

The area occupies a skyline position, there are currently extensive views from the site to the attractive countryside to the north and south west and the site is viewed from various Public Rights of Way (PROWs), lanes and properties (in the countryside, city edge to the north west and the area around Combe Hay to the south east of the site). Views from the south east are all from within the Cotswold Area of Outstanding Natural Beauty (AONB). In addition the site is viewed from the A367 which crosses through the area.

Landscape Impacts

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

The landscape impact would be high

Visual Impacts

a) From view points to the North and North West

There would be a loss of an extensive length of rural skyline of hedges and trees, loss of the rural hillside view and introduction of urban character disconnected from the existing urban area. Lighting would extend out from the city into an area currently characterised by dark sky. Mitigation through tree planting would take at least 20 years before it would start to become effective.

b) From view points to South West and AONB

There are clear views of the skyline from lanes, PROWs and properties especially at the edge of Combe Hay. The skyline is attractive with trees and open land. Development would alter the skyline such that part of two storey buildings south of the A367 would be visible for at least 20 years before any mitigating planting became effective. The effect on dark skies would be high and difficult to mitigate. The countryside which is within the Area of Outstanding Natural Beauty is of a very high quality. Skyline development from these views is atypical and would be detrimental to the quality of the Area of Outstanding Natural Beauty.

The overall visual impact would be high.

Regional Spatial Strategy

Urban Extension Environmental Capacity Appraisal

Mitigation

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

Summary

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

Historic Environment

Existing Conditions

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

Impacts

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

Mitigation

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

Summary

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

Recommend rejection on the grounds of negative impact on historic environment.

World Heritage

Existing Conditions

The study area abuts the City of Bath World Heritage Site boundary and lies within the immediate setting of the World Heritage Site.

The key characteristics and values of the World Heritage Site setting at this point are:

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

Impacts

While there is scope to improve the environment and presentation of this gateway to the city (made untidy by the Park & Ride and Fuller's Earth Works site), this could be achieved without development. Also, an urban extension is no guarantee of achieving improvements and brings additional issues of concern.

This site lies outside what is essentially a landscape pinchpoint at the entrance to the city and development here will create a largely separated settlement area, rather than a true urban extension. This would disrupt the well defined urban edge to the World Heritage Site, bringing the city out into the countryside surrounding the city.

The city would become visible to a wide swathe of the surrounding countryside, revealing the city rather than maintaining Bath's character as a hidden city.

This would be a negative impact on the integrity of the World Heritage Site and its setting, changing its visual and physical character to a detrimental degree.

The likelihood for further Roman remains in this area is high and development in this area would potentially have a very damaging impact on any buried archaeology, which could have a detrimental impact on the outstanding universal values of the World Heritage Site.

The impact would be high.

Mitigation

It would not be possible to mitigate the impact that development outside this landscape pinchpoint would have on the clearly defined edge between the city and its rural setting.

In addition, the sloping nature of the northern side of the study area, and the long distance views to the area from the surrounding countryside, especially from the west, would be very difficult to mitigate, even with planting barriers. The urban form would still be visible and the rural setting and approach to the World Heritage Site will be urbanised.

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

Summary

High impact on the setting of, approach to and edge of the World Heritage Site, significantly altering the character of the area and degrading the city's defined urban edge and abrupt change from urban to rural environment.

It is not able to be mitigated due to the prominence and character of the development site and its awkward relationship to the edge of the city.

Nature Conservation

Existing Conditions

- This site is located within a Strategic Nature Area (RSS designation).
- It is within the main feeding areas (sustenance areas) and flight corridors for Horseshoe bats associated with the Bath and Bradford-on-Avon Bats Special Area of Conservation(SAC).
- It is within 2km of the SAC and highly sensitive for nature conservation.
- Any plans for development within this area would be subject to the Conservation Regulations and associated assessments.
- Two ancient woodland sites (both SNCIs) lie in close proximity (<500m) to the north of the site.(The Forestry Commission should be consulted). The full interest of these woodlands is not known.
- The Fuller's Earth Works and South Stoke Complex SNCI lies immediately to the south of the area.

English Nature Report no 174 states a management objective for feeding areas for Greater Horseshoe bats to "restrain creeping urbanisation into the 3-4km area around breeding sites by opposing building developments through planning procedures."

Impacts

Development here would result in the direct loss of land from the SNA, reducing the areas strategic capacity for habitat restoration and enhancement.

It would cause significant habitat fragmentation within an area of high ecological importance, with significant impacts upon foraging opportunities for Horseshoe Bats associated with the SAC.

It would cause habitat deterioration to bat foraging areas and designated sites through impacts of lighting, noise and general disturbance.

Development would impact upon a known Greater Horseshoe night roost.

It is likely that the integrity of the SAC would be adversely affected.

The ancient woodlands and designated sites adjacent to the site would suffer indirect impacts from urban fringe pressures (recreation; pets etc)

Mitigation

The loss of land from the Strategic Nature Area (SNA) cannot be mitigated. Some degree of compensation could be achieved through off site habitat enhancement and long term management at an appropriate location and scale. This approach could help to reduce or compensate for other impacts. However the legal mechanisms are difficult and untested locally.

It may be possible to reduce the effects of habitat fragmentation through the strategic provision of natural corridors within the development and through off-site works. This approach would require further surveys including radio tracking, and may reduce the site's housing capacity. However, the SNA would remain fragmented, and mitigation of impacts to the integrity of the SAC cannot be confirmed at this stage.

An innovative approach to mitigation involving significant off-site works would be required. This is difficult and untested.

Summary

An assessment of Likely Significant effects has been carried out and concluded that an Appropriate Assessment is required. Mechanisms for achieving off-site compensation, and further investigation of bat activity within the area, including radio tracking, is required before final decisions about allocation and site capacity are made.

Ecological objections pending further investigations, and evidence to show that integrity of SAC is not adversely affected.

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West of Twerton: Capacity Summary

Note: As the area is considered to be unsuitable for an urban extension as defined in the key for red areas adjacent, no development capacity is indicated.

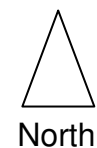
After the Heritage and Environment Team carried out their appraisals of each area, summary plans were produced to bring together the various issues. Each area was summarised using the three coloured definitions indicated in the methodology, which is repeated below:

	Areas considered by the group as not appropriate for development because of impacts identified concerning a range of environmental issues and urban design factors. The group recommends that the Council should not consider these areas suitable for an urban extension.
	Areas considered by the group to be questionable for development due to a high impact on at least one significant environmental factor. The group recommends that further work should be carried out to assess the full implications of the impacts if the Council is minded to consider these areas for an urban extension.
	Areas considered by the group to have the potential to accommodate development with less negative impact on environmental factors and urban design considerations. The group recommends that these areas should be considered for an urban extension subject to further relevant suitability assessments.

West of Twerton:

Total area appraised: 116ha

Red Area: 116ha



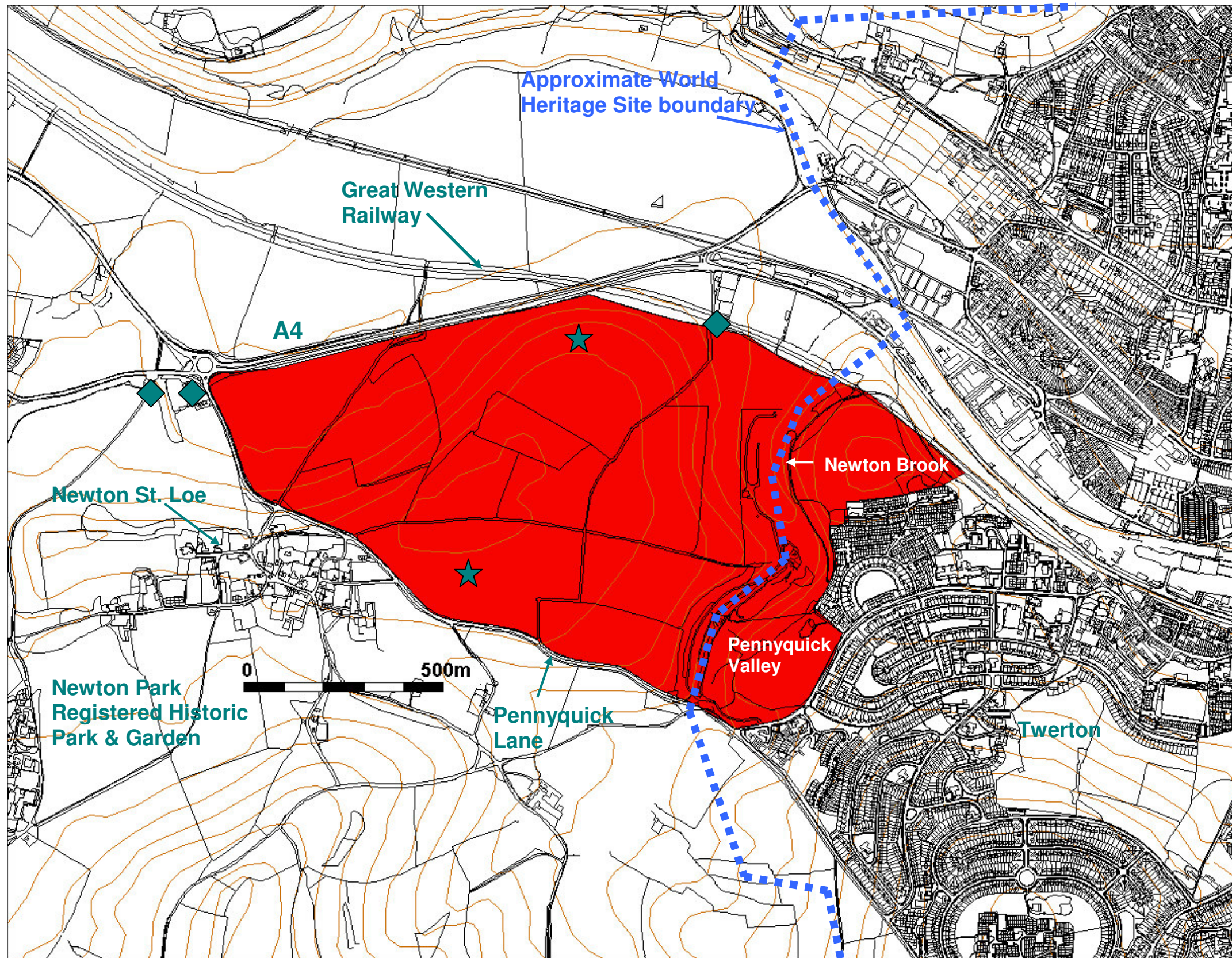
Notes

- To be read in conjunction with main report
- Scale bar located on drawing

★ Historic Sites

◆ Listed Buildings

West of Twerton: Capacity Summary Plan



West of Twerton Appraisal

Site overview

This site is separated from the existing facilities in Twerton by the steep sided valley of Newton Brook. This seriously impacts on the potential for easy walking from the site to local facilities bringing into question its suitability as a sustainable urban extension to the city.

Local facilities (distances measured from centre point of site, although these do not take into account the local steep topography)

- Distances are measured following existing road network
- Local facilities (Twerton High Street) – 2km
- Primary School (St Michael's, Twerton) – 1.5km
- Secondary School (Culverhay School) – 2.8km
- Playing field (Newton Road) – 1km

Urban Design

Opportunities

- Potential benefits in proximity to proposed new Park and Ride site adjacent to A36, although steep topography likely be a barrier.

Limitations

- Development in this area would be very visually prominent, breaching the containment to the existing urban area provided by Carr's Wood and the Newton Brook valley, which provides a clearly defined edge to the city.
- Setting of Newton St Loe is an important consideration

Notes

The scenario tested involved assessing the impact of development on the plateau alongside Pennyquick Lane. Development on the hillsides overlooking the Avon Valley would have a similar negative impact.

Landscape & Visual Aspects

Existing Conditions

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

The area is a skyline site with extensive views to and from the Cotswold Hills plateau to the north and east, the river Avon valley to the north west and east and the rolling countryside of the Hinton Blewett and Newton St. Loe Plateau lands to the south and west. Development would be visually prominent in these views.

Landscape Impacts

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

The landscape impact would be high.

Visual Impacts

The site is viewed from a number of rural lanes to the south, from the edge of Newton St Loe and from Twerton / Whiteway as well as the river Avon, A4 and Great Western Railway. These are local and middle distance views and the development would be very prominent both on the skyline and down the slopes to the road. Development would be visually incongruous being disconnected from both Bath and Newton St Loe. Lighting at night would be highly intrusive in the dark sky.

From Kelston, the Kelston Road and across the Avon valley and various points on the Cotswold ridge in the AONB, the development would be prominent on the skyline and out of character with the currently very attractive rural view. Development would also be visually separated from Bath and without context and conspicuous in the night sky.

The overall impact would be high.

Mitigation

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

Summary

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

Historic Environment

Existing conditions

- Bath Conservation Area lies to the north-east of the appraisal area along the Newton Brook, and Newton St Loe Conservation Area to the west along Pennyquick.
- Three Grade II Listed Buildings lie on the boundary of the appraisal area – The Globe Inn, Newton Park Gate piers and the railway bridge on Stoney Lane.

Regional Spatial Strategy

Urban Extension Environmental Capacity Appraisal

- Newton Park (Registered Historic Park & Garden) lies to the north-west along Pennyquick.
- Within appraisal area there is evidence of Iron Age field systems, a Roman villa, cemetery and pottery, and the site of Newton Mill.
- The Great Western Railway forms the north-east boundary of the appraisal area.

Impacts

Development of the area could potentially have a very damaging effect on any buried archaeological remains, including the known Iron Age and Roman occupation in the area. There are serious concerns about the visibility and views of any development in this area and its impact on the setting of Newton Park (Registered Historic Park & Garden) and the rural character of the Newton St Loe Conservation Area.

Mitigation

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

Summary

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

Recommend rejection on the grounds of negative impact on historic environment.

World Heritage

Existing Conditions

The study area straddles the City of Bath World Heritage Site boundary (following Newton Brook) and extends into the immediate setting of the World Heritage Site.

The key characteristics and values of the World Heritage Site setting at this point are:

- a rural approach to the city along the A4 with the city edge defined by the Newton Brook and the low-impact caravan park, then Carr's Wood – a green approach through distinctive landform with the city largely hidden until arrival;
- the city spills over the plateau ridgelines above Bath in the Twerton area to the southeast of the study area (and visible from parts of it) to the detriment of the surrounding rural setting and the clearly defined edge to the urban settlement;
- very rural surroundings, particularly on the southern edge to the study area, characterised by narrow lanes, historic farm buildings, rolling hills and valleys, with a clearly defined edge of the city along Whiteway Road;
- Roman archaeological remains within the study area (villas and burials) with potential for further remains in and around the study area;

- long distance views to the study area from the surrounding countryside, particularly the AONB to the north.

Great Western Railway (GWR): The northern boundary of this study area follows the line of the GWR and includes part of the Twerton Tunnels. The GWR is on the UK Government's list of Tentative World Heritage Sites (and may therefore become a World Heritage Site in future) and the Twerton Tunnels are included in the Bath section of this potential World Heritage Site.

Impacts

Development in this area would extend the city by a significant degree out of the landscape bowl in which the World Heritage Site currently sits. The overspill of development at Twerton shows how changed the city edge becomes when development extends down the slopes.

The current abrupt change from urban to rural along Whiteway Road, and the landscape containment of the city around Newton Brook would be greatly changed by development in the study area, urbanising this rural setting to the World Heritage Site, and making the city newly visible to a wide area of surrounding countryside.

This area is a very distinctive landscape entrance to the World Heritage Site, 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 World Heritage Site setting and its character as a main approach and entrance point, and would make the city newly visible to a wide area of countryside.

This 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.

Development in this area would potentially have a very damaging impact on archaeological remains in and around the study area, including known and potential areas of Roman occupation, closely connected to the Roman remains within the World Heritage Site.

The impact on the City of Bath World Heritage Site would be high.

GWR: The Twerton Tunnels lie beneath the Carr's Woodland Local Nature Reserve and therefore development is unlikely to physically affect the GWR tentative World Heritage Site. However, the stretch of railway leading away from / approaching the tunnels, and therefore Bath, currently runs through a relatively unchanged landscape. Development on the study area visible from the railway line could potentially impact on the character and authenticity of the setting of this tentative site, changing it from predominantly rural to urban.

Mitigation

It is hard to identify any effective mitigation to avoid the detrimental impact of urbanising the rural setting of the City of Bath World Heritage Site, and extending the city further away from the landscape bowl within which it sits.

The hill within the study site is a notable landscape feature as you approach Bath, hiding much of the city until the point of arrival at the city edge and providing an impressive gateway to the World Heritage Site.

The development would create an urban skyline on this hill and while screen planting might eventually decrease the impact of this when viewed from the north, it would not be possible to achieve this when viewed from the south side due to the sloping nature of the site.

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

GWR: Since the development site lies on a steep slope and hilltop, it is difficult to identify any effective mitigation against urbanising a rural area.

Summary

High impact on the setting of, approach to and edge of the City of Bath World Heritage Site, significantly altering the character of the area and degrading the city's defined urban edge and distinctive landscape setting. It is not able to be mitigated due to the prominence and openness of the site.

GWR: Possible impact on the wider setting of the Great Western Railway tentative World Heritage Site that would be difficult to mitigate due to the prominence and openness of the site.

Nature Conservation

Existing Conditions

- The development area lies within 4.4km of the Bath and Bathampton Down SAC
- It is close to Green Infrastructure identified in draft RSS documents.
- No significant ecological features or interests are known within the development area. (Further surveys should be undertaken before final allocation and capacity decisions are made)
- Carr's Wood Local Nature Reserve and the Newton Brook (SNCI) lie immediately to the east of the site.

A geological SSSI lies to the north of the site and must be protected from any off site works.

Impacts

Loss of green field land close to green infrastructure, associated habitat fragmentation, and potential species loss.

Habitat disturbance and degradation of designate sites (Carr's Wood and Newton Brook), through urban fringe pressures.

Potential habitat enhancements through provision of strategic open space if designed to include new woodland and woodland edge habitat and to link up existing woodlands.

Mitigation

Protection and enhancement of Carr's Wood and Newton Brook through expansion and development of LNR – to include new areas of woodland, woodland links, and improved habitat management.

Design layout and capacity to be informed by site surveys.

Summary

Site surveys and further impacts assessments should be undertaken prior to site layout and capacity decisions.

No known objections.

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Haycombe: Capacity Summary

Note: As the area is considered to be unsuitable for an urban extension as defined in the key for red areas adjacent, no development capacity is indicated.

After the Heritage and Environment Team carried out their appraisals of each area, summary plans were produced to bring together the various issues. Each area was summarised using the three coloured definitions indicated in the methodology, which is repeated below:

	Areas considered by the group as not appropriate for development because of impacts identified concerning a range of environmental issues and urban design factors. The group recommends that the Council should not consider these areas suitable for an urban extension.
	Areas considered by the group to be questionable for development due to a high impact on at least one significant environmental factor. The group recommends that further work should be carried out to assess the full implications of the impacts if the Council is minded to consider these areas for an urban extension.
	Areas considered by the group to have the potential to accommodate development with less negative impact on environmental factors and urban design considerations. The group recommends that these areas should be considered for an urban extension subject to further relevant suitability assessments.

Haycombe:

Total area appraised: 45.8 ha

 **Red Area: 45.8 ha**



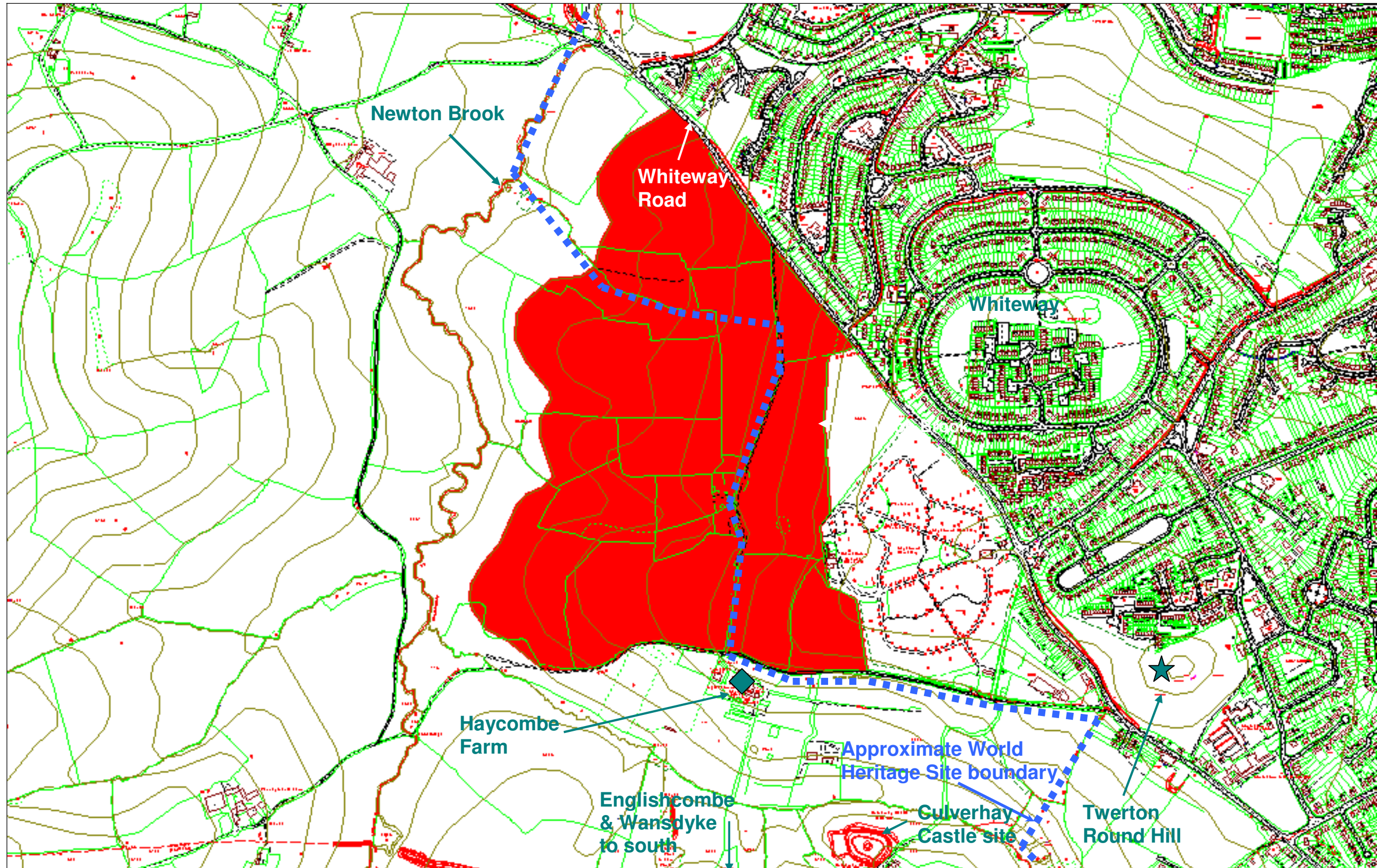
Notes

- To be read in conjunction with main report
- Scale bar located on drawing

 Historic Sites

 Listed Buildings

Haycombe: Capacity Summary Plan



Haycombe Appraisal

Site overview

Local facilities (distances measured in straight line from centre point of site)

- Local shops – 1000m (Whiteway), 1250m (Twerton)
- Primary School – 750m (Twerton Infants), 1050m (St Michael's), 1270m (Southdown).
- Secondary School – 1700m (Culverhay).
- There is a bus route to Whiteway from the city centre.

Urban Design

Opportunities

- Development in this area can make good use of a wide range of existing facilities and services. It also has the potential to provide additional services such as a local shop that would also be beneficial to existing residents in the area.
- Public transport accessibility needs to be assessed but given the road network in this area it is likely that accessibility could be enhanced.

Limitations

- Development in this location would breach the strong edge provided by Whiteway Road and introduce development onto the southern slopes of this hillside. This road helps to contain the existing development which is predominantly on the north eastern edge of this hillside. Breaching this strong edge works against the 'character of containment' that is an important feature of the city, and relates to the unique relationship between the built areas and its rural hinterland.

Landscape & Visual Aspects

Existing Conditions

The appraisal area is bounded by Whiteway Road to the north-east, the Newton Brook valley to the west, Haycombe Lane to the south and Haycombe cemetery to the east.

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

Impacts

Development would extend beyond the higher ground and Whiteway Road into the Newton Brook valley. This would radically change the tranquil rural character of this attractive landscape. Part of Twerton is widely visible from the rural landscape to the north west however development at this location would extend the intrusion of development over a much larger area to the west of Bath.

In such a complex landscape there are numerous vistas from public viewpoints and roads. The visual impact of development on views would be severe from the vast majority of views with loss of the attractive, high quality rural landscape and loss of intricacy.

Mitigation

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

Summary

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

Historic Environment

Existing conditions

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

Impact Assessment

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

Mitigation

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

Summary

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

Recommend rejection on the grounds of negative impact on the setting of historic environment.

World Heritage

Existing Conditions

The appraisal area sits partly within the World Heritage Site boundary and partly within the immediate setting of the World Heritage Site.

The key characteristics and values of the World Heritage Site and setting at this point are:

- a strongly defined urban edge along the Whiteway Road, rarely crossed by development and changing in character immediately into a very rural and attractive landscape;
- the city largely hidden when viewed from the west, with the exception of the overspill at Twerton which can be seen from the north-west and which is detrimental to the character of the World Heritage Site edge and setting.

Impacts

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

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

Mitigation

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

Summary

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

Nature Conservation

Existing Conditions

- The appraisal area lies within 4km of the Bath and Bradford on Avon Bat SAC
- Green infra structure identified for the draft RSS crosses the South West Corner of the development area. This corridor is considered an important foraging route for Horseshoe bats associated with the SAC.
- Haycombe Lane SNCI runs North South through the site.
- Haycombe cemetery borders the east of the area and has been identified as a potential Site of Nature Conservation Importance (SNCI) due to the cemeteries grassland interest.
- Newton Brook SNCI lies just to the west of the area.
- Two notable species have been recorded within the development area – a scarce plant (status need clarification) and Fieldfare an RDB species.
- No other significant ecological features are known within the development area. (Further surveys should be undertaken before final allocation and capacity decisions are made)

Impacts

Development of this area has the potential to:

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

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

Mitigation

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

Summary

The appraisal area should be subject to further survey prior to final site layout and capacity decisions. This should include the status of notable species recorded.

The site has some ecological interest both within the appraisal area and adjacent to it. However, from existing knowledge, there would appear to be good opportunities to achieve mitigation. This may require off-site habitat management and enhancement of adjacent SNCIs.

Appendix

English Heritage Letter as referred to on page 27:

Direct Dial: 0117 975 0699

BY EMAIL & POST

Date: 9th May 2006

Richard Sermon
Archaeological Officer
Bath & North East Somerset Council
Trimbridge House Trim Street
Bath
BA1 2DP

Dear Richard,

RE: Regional Spatial Strategy – Odd Down & Whitchurch

Thank you for consulting English Heritage on this matter. You are correct to flag up the significant heritage constraints prevailing within the search areas. I will give a broad assessment of the search areas in the absence of detailed plans, but please note that this advice only relates to known, designated heritage assets, not sites of local or regional significance for which your Historic Environment Record is best placed to offer advice. In addition, there will be archaeological potential at each of the search areas which will only be realised by detailed assessment and evaluation. The results of such work may identify further heritage constraints.

- **Odd Down (Area 1a)** – this area is centred upon the Fosse Way, a former Roman road and a historic route/portal into the city. In terms of potential impacts on designated sites and areas B&NES should carefully consider the setting of the World Heritage Site, including the effect of potential development upon views into and out of the WHS. In addition an unscheduled section of the West Wansdyke forms part of the northern site boundary and a scheduled section (SAM No. BA95) lies nearby to the northwest of this. The setting of the Wansdyke is a material consideration. B&NES should consider the constraints upon potential development in Area 1a which could arise when the WHS & SAM setting issues are taken into account.
- **Odd Down (Area 1b)** – This area contains a number of significant constraints centred upon the well-preserved, easternmost section of the West Wansdyke, which is a Scheduled Monument (No. BA93). The Wansdyke is a major linear earthwork thought to be of sub-Roman or early Saxon origin. Archaeology of this period is generally rare, so to have such a major earthwork of this date on the edge of the city is a significant heritage asset for Bath.

As a Scheduled Monument its setting is a material consideration, but at Area 1b the issue of setting is enhanced by other factors. Ever since its construction, the Wansdyke has been recognised as a major boundary marker. It is the parish boundary, it marks the

southern edge of the World Heritage Site and is part of the northern boundary of the Cotswolds AONB along the southern edge of Bath.

The Wansdyke was designed as monument that should be seen, a clear marker of territory in the landscape. As such it requires a clear viewfield to be properly understood and appreciated. The land on the north side of the monument has infilled with development over time and now forms an abrupt edge to the urban area.

Until relatively recently, this abrupt edge to the city extended from the A367 Radstock road in the west across to the B3110 Frome road in the east. The 1990s development known as Sulis Meadows, immediately west of Area 1b, now means that the length of Wansdyke forming the north edge of Area 1b is the last part of the monument where it can be viewed clearly across open land and where its function as a boundary is plain to see.

On Scheduled Monument setting grounds alone it could be argued that the fields forming Area 1b should be kept free from development. However, if in addition one considers the historic boundary function of the Wansdyke for at least 1400 years, the fact that it forms the edge to the WHS (with all associated setting issues), that it marks the edge of the AONB, and that it so abruptly marks the edge of the modern city, then in my view there is a strong overall case against development at this location.

One more factor that should be considered is the impact of development upon the Wansdyke itself. At Sulis Meadows, and to the west again adjacent to the school playing fields, development or enclosure has lead to the monument being isolated within a linear strip of varying width. The resultant pressure upon the monument from increased pedestrian and vehicular traffic, flytipping and vandalism has resulted in intractable problems with erosion and damage. Development in Area 1b would only add pressure upon a fragile resource of clear national importance.

- **Hicks Gate (Area 4a)** – This area has no Scheduled Monuments either within it or within its vicinity. It is also remote from the World Heritage Site and there are no G1 or G2* listed buildings within the area, based upon the information I have available. However the Foxes Wood Registered Park/Garden lies to the northwest of the search area, and its setting would be impacted upon by any development in adjacent land parcels. B&NES should consider the impact upon that setting of any potential development in this area.
- **Whitchurch (Area 4b)** – This area lies to the northeast of Maes Knoll Iron Age hillfort, a major Scheduled Monument (No. BA25), which is understood to be the western terminal of the West Wansdyke. A well-preserved section of the Wansdyke adjoins the hillfort and is also a Scheduled Monument (No. BA99). Maes Knoll commands wide views over the surrounding countryside and much of Area 4b lies within its setting zone. B&NES should carefully consider the impact that development within Area 4b would have upon the setting of Maes Knoll and the Wansdyke. English Heritage will seek to preserve the integrity of that setting and B&NES should take into account the constraints upon large-scale development that may entail.

In addition, the search area contains a G2* listed building (Lyons Court Farmhouse) and the G2* listed St Nicholas Church sits on the boundary of the area. The need to preserve

Regional Spatial Strategy Urban Extension Environmental Capacity Appraisal

the farmhouse and the need to preserve the setting of both G2* buildings must be a further consideration here. B&NES should also consider the impact of potential large-scale development upon the setting of the Queen Charlton Conservation Area, and the fact that Whitchurch itself is being considered in the current round of Conservation Area reviews.

The above comments represent a rapid assessment of potential constraints due to the presence of designated heritage assets. However, they should not be seen as definitive in the absence of detailed plans. They are no substitute for the detailed desk-based studies that will be necessary to properly assess the potential impact of large-scale development upon the overall cultural heritage of the search areas.

You may be aware that English Heritage has also been consulted on this matter by B&NES' Consultant Planner Keith Goodred, albeit with a different search envelope which stretches from the River Avon west of Newbridge, across to the A367 Radstock Road. This search area is much larger in size & scope and although we intend to offer advice we do not have the capacity to make detailed comment, which should properly be the subject of a B&NES commissioned assessment of the cultural heritage resource and the impact that development would have upon it.

I understand there are other search areas being considered on the outskirts of Bath as part of the RSS assessment, but that English Heritage has not been consulted upon those areas due to the absence of designated heritage sites.

Please contact me at the first opportunity if you require further advice.

Yours sincerely,

PHIL MCMAHON
Inspector of Ancient Monuments

Copied to: Ross Simmonds, EH SW Planner

Please note that English Heritage operates an access to information policy. Correspondence or information which you send us may therefore become publicly available.