

**Bath and North
East Somerset
Council**

**Consultation on
the Core Strategy
Green Belt
Amendments**

**Representations on
behalf of South Stoke
Parish Council in
respect of Policy
CSA22**

Prepared by:
**The Environmental
Dimension
Partnership (EDP)**

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THE
ENVIRONMENTAL
DIMENSION
PARTNERSHIP



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Plan EDP 1	Bath and North East Somerset Council Consultation on the Core Strategy Green Belt Amendments (EDP2225/01 16 December 2013 GC/AC)
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Executive Summary

- ES1 The Environmental Dimension Partnership (EDP) has been appointed by South Stoke Parish Council to undertake a review of the Council's proposed CSA22 Strategic Housing Allocation and proposed Green Belt boundary in the Odd Down/South Stoke area.
- ES2 EDP has undertaken a review of the Council's Core Strategy evidence base relating to the proposed changes, augmented by site visits undertaken during the Core Strategy consultation period. Particular attention has been paid to the likely effects of the Council's proposals on the heritage, landscape and ecological interests of the area.
- ES3 EDP's overall conclusion is a confident one, the detail of which is summarised in these representations; it is that the Council's proposals *will* undoubtedly have harmful effects on three statutorily designated heritage assets – all of which are deemed to be of at least national importance (see **Plan EDP 1** attached):
- **The City of Bath World Heritage Site** will be harmed because (as the Council's own evidence base acknowledges): (1) the open and undeveloped landscape around the margins of the city comprising the setting to the WHS makes a strong contribution to this internationally important asset's appreciation and (2) because the 'rural and isolated village of South Stoke' forms part of that open and undeveloped landscape setting.
 - **The Wansdyke Scheduled Monument** is already on English Heritage's 'at risk' register by virtue of the encroachment and erosion directly attributable to past housing allocations abutting the monument. Further allocations will unquestionably exacerbate this problem. Moreover, the proposed Green Belt release, when developed, will isolate the asset from land which historically, culturally and visually comprises its setting. The interests of the Wansdyke Scheduled Monument are protected by both the Ancient Monuments and Archaeological Areas Act of 1979 (as amended) and the National Planning Policy Framework.
 - **The South Stoke Conservation Area** Appraisal, produced and approved under the Council's direction, specifically and repeatedly highlights that *"...one of the essential and fragile characteristics of the village is that it has been able to maintain its historic rural character and tranquillity despite its proximity to a busy urban centre"*. Its essential character hangs by a thread – or more accurately, two threads - the retention of the essentially rural character of South Stoke Lane (which separates the village from the nearby urban area) and the openness of the agricultural land to the west. Both features are all that prevents the village from being perceptually subsumed into the city limits. The Council's proposed Green Belt changes would bring hundreds of new homes in due course as close as 100m from the current conservation area boundary. In the event that BANES approved

May 2011 draft extension to the Conservation Area is adopted, the proposed Green Belt release would *actually adjoin* the Conservation Area. The CSA22 allocation would also fundamentally change the character of South Stoke Lane by virtue of the new access required off it to serve the future housing. In these respects the proposals are fundamentally contrary to the interests of the conservation area, which the Council has a statutory duty to 'preserve and enhance'.

- ES4 In addition, while EDP's ecological studies suggest that a maximum allocation of 300 units would probably not have a materially adverse effect on the Bath and Bradford Avon Bats Special Area of Conservation (SAC), were the allocation to be increased, as some will argue, the cumulative effects of further housing development in the area raise real questions about the ability to comply with European and UK policy relating to the protection of bats.
- ES5 The Council's evidence base offers no '*clear or convincing justification*' for the nature and extent of the harm anticipated to the City of Bath World Heritage Site, the Wansdyke Scheduled Monument or the South Stoke Conservation Area – as required by Paragraph 132 of the NPPF.
- ES6 Moreover, in light of the importance of these designated heritage assets to the historic environment, South Stoke Parish Council considers that the 'bar should be set very high' in terms of the justification required for the proposed changes to the Core Strategy, because these assets are a '*finite and irreplaceable resource*' (as defined by the NPPF) and the Council's proposals, once development has taken place, are irreversible.
- ES7 For all the above reasons, South Stoke Parish Council **objects** to Policy CSA22 as a matter of principle. It believes that the plateau land represented by the proposed policy CSA22 release should remain open and wholly within the Green Belt for the reasons set out above and in these representations.
- ES8 However, South Stoke Parish Council recognises that the NPPF requires the degree of harm expected from the Council's obligation to meet current and future housing need in the city needs to be balanced against the perceived public benefits accruing from the proposals. As a result, harm to, or loss of a designated heritage asset might not, in itself, represent an automatic bar to development being permitted, so long as any harm is outweighed by the perceived public benefits in the form of new housing. South Stoke Parish Council also accepts that the Council must find land to meet its current and future housing requirements.
- ES9 It therefore accepts that the Inspector may judge that the exercise to balance these competing interests (public benefit and harm) prescribes that some land in the Odd Down/South Stoke is removed from the Green Belt.

- ES10 However, as currently drafted, the CSA22 policy is fundamentally flawed. It is understood to propose 300 dwellings spread across the entire 30.9ha Green Belt release area ⁽¹⁾, equivalent to an average density of only 10dph. This is clearly very low and reflects the provisions of the Council's analysis plan for CSA22 contained as **Appendix EDP 2**. To spread 300 houses across a 30.9 ha Green Belt release spreads harm across a wide area without yielding a significant contribution to the Council's housing land shortfall. It is vague in terms of the manner in which the capacity of the site has been calculated ⁽²⁾ and risks inviting much larger housing numbers to be being argued for and attributed to the area.
- ES11 Were the Inspector minded to release some land at Odd Down/South Stoke from the Green Belt, South Stoke Parish Council considers that a far better strategy would be to release only the land west of Sulis Manor from the Green Belt, which is already separated from the Wansdyke by existing housing and is furthest from the South Stoke Conservation Area. Whilst still considered harmful to the heritage interests locally, it is the least harmful. It releases an estimated 7.7ha of land from the Green Belt (see **Appendix EDP 4**), the field portion of which (5.5ha net of existing strategic planting) could be developed at a more conventional density yielding, in itself, over half of the Council's CSA22 allocation.
- ES12 The proposed amendments to the Green Belt currently include the release of land east of Sulis Manor, as far as the proposed extension to the South Stoke Conservation Area or to with 100m of the existing conservation area boundary . This, the Parish Council fundamentally objects to. For all the reasons set out in these representations, the Parish Council considers that the 'public benefit' in the form of the future housing yield would be extremely modest and would not be outweighed by the certain harm that will arise.
- ES13 There is simply no justification for releasing land east of Sulis Manor in order to yield an additional 150 houses over that possible were the Parish Council's approach, described above, to be adopted.
- ES14 In the context of the housing land supply challenges faced by the Council, the harm which will accrue from the release of CSA22 from the Green Belt – and certainly from the release of any land east of Sulis Manor - would simply not be justified by the public benefit in the form of the area's very limited contribution to the Council's overall housing land shortfall.

¹ EDP personal contact with BANES strategic planning officer on 17th December 2013. 30.9 ha measured by EDP – see Appendix Edp 4

² While the plan notes 'Avoid substantial harm to the Wansdyke' and 'Avoid harm to WHS' it fails to make any reference to the adjacent South Stoke Conservation Area. Access arrangements are wholly vague as are the precise setback distances

- ES15 Accordingly, other options should be pursued, where the level of harm to the historic environment *would* be outweighed by the public benefits of the proposal, or could at least be appropriately mitigated, in order to achieve the housing growth determined to be necessary to deliver a sound Core Strategy.

*The Environmental Dimension Partnership of behalf of South Stoke Parish Council
December 2013*

Section 1

Introduction

- 1.1 Earlier this year Bath and North East Somerset Council ('the Council') consulted on proposed changes to the Core Strategy including the identification of broad locations where land should be removed from the Green Belt to help meet the District's needs for housing. Five broad locations were identified, including one at 'Odd Down/South Stoke'. The Council has produced an evidence base to support its proposed Green Belt Releases in these five areas and representations are now being sought on the proposed changes. The consultation period for the proposed changes runs from 11th November to 20 December 2013.
- 1.2 The Environmental Dimension Partnership (EDP) is a 50 strong independent environmental planning consultancy with offices in the Cotswolds and Shrewsbury. EDP provides advice to landowners and developers in respect of heritage, archaeology, ecology, landscape and arboricultural matters on a very broad range of strategic and planning application matters throughout the UK. Details of the practice can be obtained from our website www.edp-uk.co.uk.
- 1.3 Concerned about the potential implications of the Council's proposed Green Belt changes on the village of South Stoke, South Stoke Parish Council approached EDP in November 2013, shortly after the opening of the aforementioned public consultation period, to enquire whether the Practice would be willing to represent the Parish Council. After a preliminary review of the case material, EDP agreed to act, because we believe that the Council's proposals represent a genuine threat to the character and special qualities of the village, the Bath World Heritage Site and the Wansdyke Scheduled Monument – and as such, are contrary to a range of statutory and non-statutory guidance.
- 1.4 These representations summarise the basis of the Parish Council's concerns and are structured as follows:
 - Section 2 summarises the baseline position in respect of landscape and heritage matters ;
 - Section 3 discusses the potential ecological effects of the proposed Green Belt changes in the Odd Down/South Stoke area; and
 - A summary of the representations is provided in the Executive Summary.

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Section 2

Heritage and Landscape Issues

Introduction

- 2.1 The following paragraphs review Bath and North East Somerset's *Schedule of Core Strategy Amendments* (November 2013) insofar as they relate to (1) Policy CSA22 *Land adjoining Odd Down, Bath: Strategic Site Allocation* and more particularly (2) the impact they will have on the conservation and management of the landscape and historic environment resource at that location.
- 2.2 In doing so, reference is made to the following three documents:
- Bath and North East Somerset 2010 *The City of Bath World Heritage Site Management Plan 2010-2016*
 - Bath and North East Somerset Planning Services 2011 *South Stoke Conservation Area Appraisal Draft – May 2011*
 - Land Use Consultants (LUC), Bath and Regional Archaeological Services (BaRAS) and The Conservation Studio (TCS) 2013 *Bath and North East Somerset Core Strategy Placemaking Plan Additional Evidence: Heritage Asset Study*
- 2.3 These documents have been used to identify those heritage assets, whether designated or non-designated, which are of relevance to the proposed allocation of *Land adjoining Odd Down, Bath* in the emerging Core Strategy.
- 2.4 In this case, those assets comprise:
1. The City of Bath World Heritage Site;
 2. The Wansdyke (section 1230 yards eastwards from Burnt House Inn); and
 3. The South Stoke Conservation Area.
- 2.5 The impact of the proposed allocation of land at Odd Down, in respect of these three assets, will be considered in turn below.

1. Planning Policy Context

- 2.6 Under the heading '*Conserving and Enhancing the Historic Environment*', Paragraph 126 of the NPPF makes the following statement:

"Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance (EDP emphasis)"

- 2.7 Subsequently, Paragraph 132 of the NPPF then adds the following statement in respect of the conservation of 'designated heritage assets', which Annex 2 defines as "...a World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation":

"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional" (EDP emphasis)*

- 2.8 These two paragraphs should inform the Council's approach to the identification and allocation of land for Green Belt release within the Core Strategy, whereby heritage assets represent a 'finite and irreplaceable resource' and where any harm or loss of a designated asset should require clear and convincing justification, including harm to an asset's setting, as opposed to its physical preservation.

2. Assessment of the Baseline Position

- 2.9 The following paragraphs assess the baseline position in respect of the significance and setting of the three designated heritage assets likely to be affected by the proposed Green Belt release, the extent of which is illustrated on **Plan EDP 1**.

The City of Bath World Heritage Site

- 2.10 The boundary of the World Heritage Site (WHS) is illustrated at **Plan EDP 1**. Paragraph 3.64 of Appendix 3 to LUC, BaRAS & TCS (2013) states that "...the WHS boundary includes Sulis Manor and Gardens, which is [sic] situated within the development site boundary". It then subsequently adds that "...the WHS is adjacent to the potential development site's northern boundary". This is the same as the northern boundary of land covered by Policy CSA22. The accuracy of this assessment has been confirmed by EDP in preparing these Representations.
- 2.11 In describing the World Heritage Site, Paragraph 2.2.2 of the *City of Bath World Heritage Site Management Plan* observes that:

"The wider landscape setting lies beyond the Site boundary. There is no formal buffer zone. However, its setting is identified through the Setting Study... and protected through planning policy (see Section 3.4)"

- 2.12 The conclusion that the setting to the City and the WHS is critical to its appreciation is confirmed at Paragraph 2.4.20 of the *City of Bath World Heritage Site Management Plan*. It states that:

"The landscape surrounding the city provides the setting to the Site and as such is highly significant. The city sits in the hollow of the river valley and surrounding hills offer views across the site. Skylines, vistas and panoramas are therefore significant elements, as are approach routes, waterways, trees and woodlands"

- 2.13 Not surprisingly, this theme is carried forward to the 'Vision and Aims', which states, at Paragraph 4.2.1 that:

"The aims of the [Management] Plan are to... ensure the Outstanding Universal Values of the Site and its setting are understood, protected and sustained"

- 2.14 At Paragraph 3.87 of Appendix 3 to LUC, BaRAS & TCS (2013), the potential impact of development within the land covered by Policy CSA22 is addressed at a detailed level, with reference to specific fields within it, as illustrated on the extract of the report which is reproduced here as **Appendix EDP 1**:

"B&NES Council carried out an LVIA study in relation to the World Heritage Site. This concludes that the significance of the impact on the WHS will vary between the various fields within the site as follows:

- Development on the sports field and Field East 1 will have an impact of low negative significance on the WHS.*
- Development on fields West 1 north and East 4 north will have an impact of medium negative significance on the WHS.*
- Development of fields West 2, West 1 south, East 4 south, East 3 and East 2 will have an impact of high negative significance on the WHS."*

- 2.15 Putting the Council's LVIA to one side, the latest English Heritage guidance; *The Setting of Heritage Assets: English Heritage Guidance* (2011); states that the concept of setting:

"...embraces all of the surroundings...from which the heritage asset can be experienced or that can be experienced from or with the asset. Setting does not have a

fixed boundary and cannot be definitively and permanently described as a spatially bounded area or as lying within a set distance of a heritage asset”.

- 2.16 In that regard, the Council’s draft appraisal for the South Stoke Conservation Area (addressed in more detail later at Paragraph 2.32 *et seq*) is of importance as it clearly states that:

“...the settlement is located just outside the southern limits of the Bath World Heritage Site but within its setting”.

- 2.17 In view of that assessment, it seems inconceivable that all of the land within the proposed Green Belt release at Odd Down/South Stoke is not also encompassed within the World Heritage Site’s setting.

- 2.18 Given the unambiguous statement in the management plan (above) that ‘*the landscape surrounding the city provides the setting to the Site and as such is highly significant*’, it must be the case that the evident inter-relationship between the urban form of the city, the open and undeveloped farmland landscape within the site and the outlying historic village of South Stoke (recognised as being of ‘special interest’) does indeed contribute to the Outstanding Universal Value of the World Heritage Site.

- 2.19 The important relationship between the City of Bath and its outlying settlements, as well as the contribution that this relationship makes to the setting of the World Heritage Site, is also very clearly identified within the draft *South Stoke Conservation Area Appraisal* which was prepared by Bath and North East Somerset Council. It states that:

“The location of South Stoke within the setting of the Bath World Heritage Site is also a contributory factor in the need to preserve and enhance the area. The UNESCO Report on the management of the Bath World Heritage Site recognises the need in Paragraph 7 of its decision paper ‘to enhance the protection of the surrounding landscape of the Site to prevent any future developments which could have adverse and cumulative impacts upon the Outstanding Universal Value of the World Heritage Site” (EDP emphasis).

- 2.20 This statement confirms not only that (a) the village lies within the WHS setting, but (b) implies strongly that the development that would inevitably flow from the proposed Green Belt release at Odd/Down/South Stoke would cause harm to the *South Stoke Conservation Area*, which the local authority has a statutory duty to ‘preserve or enhance’ and (c) , it would also cause harm to the Outstanding Universal Value of the *City of Bath World Heritage Site* by failing to enhance the protection afforded to the landscape setting surrounding this internationally important designated heritage asset.

- 2.21 In that regard, it is clearly disingenuous for LUC, BaRAS & TCS (2013) to state that development of some field parcels within the Odd Down site (covered by Policy CSA22) would have a ‘greater risk of harm’ to the World Heritage Site than others, when, in

reality, it is quite clear that the principal cause of harm to the setting of the World Heritage Site would be the destruction of the farmland landscape beyond its southern boundary, as well as the suburbanisation of South Stoke.

The Wansdyke section 1230 yards eastwards from Burnt House Inn

2.22 The Wansdyke, is most probably a Middle Saxon territorial boundary marker. It is designated as a Scheduled Monument separating the parish of South Stoke to the south from the parish of Lyncombe and Widcombe to the north and is also identified on English Heritage's *Heritage at Risk* Register.

2.23 Paragraph 3.30, Appendix 3 to LUC, BaRAS & TCS (2013) identifies that this nationally important Scheduled Monument is 'at risk' "...*mainly due to erosion caused by the use of official and unofficial footpaths*".

2.24 Consideration is given to the Scheduled Monument's 'setting' and archaeological interest/potential at Paragraph 3.27 of Appendix 3 to LUC, BaRAS & TCS (2013):

"There is a high potential for buried remains associated with the monument itself, and adjacent to it there may be enclosures of the type known from elsewhere along its line. It was probably originally in open country"

2.25 Thereafter, Paragraph 3.31 confirms that the cause of the harm that has led the scheduled monument's value to be 'at risk' is ill-considered residential development on adjoining land. It states:

"The setting of the Wansdyke has been compromised by residential development to the north of the monument (Odd Down), the garden boundaries of which encroach onto it, and a smaller area of development on its southern side (Sulis Meadows Estate), to the north west of the assessment site, which have destroyed its original open aspect at these locations"

2.26 The same paragraph continues to explain why the remaining open land to the south of the Wansdyke towards South Stoke (proposed to be released from the Green Belt) is important to its appreciation. It states:

"However, within the assessment site the open setting to the south survives (towards South Stoke), and the aspect both to and from the monument can still be appreciated in that direction, although interrupted by modern hedge and tree lines which restrict more distant aspects. Archaeologically, the open aspect is an important element of the setting, illustrating the monument's position and function as a boundary marker in what was probably a relatively sparsely settled area" (EDP emphasis).

2.27 This paragraph of the Council's own evidence base clearly highlights a number of important points noted by EDP in its early December site visit to the area:

1. EDP concurs that that modern residential development *has had* an adverse effect on the monument's setting, and that is clearly regrettable. However, that that does not provide any pretext or justification whatsoever for taking strategic planning decisions which are highly likely to inflict *additional harm* on this nationally important designated heritage asset by further compromising its wider setting.
 2. It is quite clear that the 'open aspect' across the agricultural landscape to the south of the monument towards South Stoke, and from there over the steep-sided valley beyond, does represent a very important element of the asset's 'experience'. The openness therefore contributes positively to its setting, especially given the Wansdyke's close functional and historic relationship with South Stoke, where it forms the historic northern parish boundary.
 3. Although there has been some strategic 'structural planting' undertaken on land to the south of the Scheduled Monument (presumably in an attempt to change over time, visual containment of the area), it is clear from Appendix 3 to LUC, BaRAS & TCS (2013) that the arrangement of field boundaries in this location has remained consistent since at least the mid-19th century. In fact, the Historic Landscape Character data reproduced in the same report also clearly identifies that the fields derive from *late medieval informal exchange of open field strips*. In other words :
 - The fieldscape in this area is historic and largely unmodified;
 - This landscape has historically been defined and divided by stone walls. The recent structure planting may in time be effective in changing the visual character of the area, but it is not historically appropriate in this location, within the immediate setting of the Scheduled monument; and
 - The openness of the landscape, as currently experienced, has historic relevance and contributes positively, to both the experience and setting of this nationally designated and nationally important scheduled monument.
 4. Whilst there has been harm caused to this nationally important monument, through the encroachment of domestic curtilages, a lack of proper management and the expansion of residential development to the south at Sulis Meadows, it is clear that further harm would accrue from the residential development of agricultural land to the south by virtue of (a) the loss of land which contributes positively to its setting and (b) increased erosion resulting from increased recreation.
- 2.28 When assessing the weight to be attached to these points, it should be remembered that the Council itself acknowledges that "*...the Wansdyke is...of national importance and is therefore considered to be of high sensitivity despite encroachment by modern development. There is also high potential for unknown buried remains directly*

associated with the Wansdyke in its immediate vicinity. These would be of similarly high sensitivity” (Paragraph 3.71 of Appendix 3 to LUC, BaRAS & TCS, 2013).

- 2.29 The latter quote raises yet another important point; namely that there is clearly potential for the ‘asset’ to be more extensive than the linear earthwork bank which is occupied by a Public Right of Way and defines the northern boundary of the Odd Down site might imply. Further archaeological investigation is required but, taken at face value, this raises serious questions regarding the deliverability of the site for development, as well as its capacity to deliver the number of new residential units required by B&NES.
- 2.30 Whilst the general thrust of Figure A3.11; i.e. that there will be a ‘high risk’ to significance of heritage assets throughout much of the proposed development site east of Sulis Meadows; is accepted, the suggestion that there will be a ‘medium risk’ to the significance of heritage assets through the central east-west section is certainly not. Figure 3.11 is reproduced here as **Appendix EDP 1**.
- 2.31 Based on the information provided in the Council’s own evidence base, and the results of EDP’s own site visit, there is no reason whatsoever to treat any of the land within the site east of Sulis Meadows differently; it all makes a positive contribution to both the experience and the setting of this nationally important designated heritage asset.

The South Stoke Conservation Area

- 2.32 The South Stoke Conservation Area was first designated on 21 July 1982, but more recently has been subject to a Conservation Area Appraisal completed by Bath and North East Somerset Council Planning Services in 2011 and contained at **Appendix EDP 3**. The appraisal proposes some extensions to the adopted Conservation Area boundary, approved by the Council. This appraisal was not adopted by BANES and remains in draft, although correspondence between B&NES and the South Stoke Parish Council confirms that, if the Parish Council will provide the funds, BANES will finalise and adopt the currently draft conservation area appraisal, subject to any changes to the planning context.
- 2.33 It should be noted that, as part of that appraisal process, it was proposed that the existing conservation area boundary should be extended in the north west to include the buildings and associated land at Brantwood House, which is described in the draft conservation area appraisal as being *“...an outstanding and significant historic building in the spirit of the Arts and Crafts and of a Jacobean style utilising local materials and architectural detailing. It is set within substantial and attractive grounds and ornate gardens which contain some significant tree species including a mature Cedar”*.
- 2.34 The Council has a statutory duty to either preserve or enhance the South Stoke Conservation Area under the *Planning (Listed Buildings and Conservation Areas) Act* of 1990.

- 2.35 The current northern boundary of the South Stoke Conservation Area and the proposed boundary extension are both illustrated on **Plan EDP 1**. The existing northern boundary is separated from the southern boundary of the proposed Green Belt release site at Odd Down/South Stoke by no more than 100 metres.
- 2.36 Although, there is no suggestion that the character and appearance of the conservation area would be *directly* affected (i.e. physically impacted) by the release of Green Belt land and its subsequent residential development, the proximity of the proposed Green Belt release from the CA boundary (a mere 100 metres at its narrowest point) renders it certain that the interests of the Conservation Area will be indirectly affected, by virtue of the impact upon its wider setting.
- 2.37 This is important because the South Stoke Conservation Area's 'special interest' is derived as much from its landscape setting as from its architectural interest. The conservation area appraisal (CAA) prepared by the Bath and North East Somerset Council Planning Services Team summarises the area's 'special interest' thus:
- 2.38 *"Unusual hillside location and exceptional landscape setting on the southern edge of the Cotswolds within the Cotswolds Area of Outstanding Natural Beauty"*
- 2.39 The CAA then proceeds by noting the *"...peaceful rural atmosphere with little intrusion from traffic despite proximity to Bath"* as being another feature of this designated heritage asset's 'special interest'.
- 2.40 This theme – of South Stoke retaining its rural, tranquil, village identity, in spite of its proximity to the expanding City of Bath – is evidently absolutely fundamental to the character and appearance of the South Stoke conservation area, as it is frequently referred to in the Council's own appraisal. Other such references include the following :
- "It is one of many small settlements to the south of Bath that has been able to maintain its historic rural character and tranquillity despite its proximity to a busy urban centre"*
- "Despite its close proximity to the suburban fringes of Bath the village feels entirely rural and distant from the city. There is a feeling of an atmosphere and character of the village"*
- "South Stoke has miraculously retained its physical and emotional separation and historical and architectural integrity despite its close proximity to Bath, as aspect noted by Nikolaus Pevsner writing in the 1950s...'the happy sight of a village still entirely unurbanized, through only two miles from the main station of a city'"*
- 2.41 More specifically, the character of the road approach from the north, along South Stoke Lane from the B3110 Midford Road, is singled out for comment. The CAA states that:

"...the absence of modern development on the perimeter and the way in which the village and the landscape opens out before you to the south as you enter from a narrow and enclosed entrance creates a dramatic sense of arrival from the north".

2.42 This statement, written by the Council, makes it fundamentally clear that the openness of the agricultural landscape between the Midford Road and South Stoke makes an important contribution to the character and appearance of the conservation area, by virtue of the fact that it 'prevents' the erosion of the village atmosphere through suburbanisation. The 'dramatic sense of arrival' from the north is not a long journey – only 350m between the Midford Road and the conservation area boundary – but by the same token, is proportionately sensitive to any further change or erosion of character. While the Council proposes to leave the field to the immediate west of South Stoke Lane within the Green Belt this will not prevent the character of the approach to the conservation area from changing fundamentally:

- First, even if not directly visible at all times of the year by virtue of the screening effect of the existing strategic planting, the proposition that the visitor to South Stoke will be unaware of any development on the proposed Green Belt release land is simply not tenable; the 'physical and emotional' separation, mentioned in the CAA as key to the conservation area's special interest, will be eroded;
- More fundamentally, the release of land east of Sulis Manor will trigger the need for a second major access road into the site, which the Council's draft proposals map (**Appendix 2**), indicates will be off South Stoke Lane. The modifications required to serve this purpose, combined with the additional traffic loads will irrevocably change the character of South Stoke Lane, harming the sensitive approach to the village from the north and, harming the immediate setting of the conservation area.

2.43 The importance of not eroding – directly or indirectly - the already tenuous spatial separation of the village from the greater urban area is reflected in the Council's draft conservation area appraisal when it observes that:

"South Stoke is recognised as a rural settlement located within the statutory Green Belt where the policy towards significant levels of new development is restrictive. This purpose of the Green Belt is clearly of the utmost importance to the integrity of the South Stoke Conservation Area"

2.44 In other words, it is quite clear that the approval of 'significant levels' of development within the Green Belt would compromise the 'integrity' of the South Stoke Conservation Area, and therefore conflict with the requirements of the 1990 Act.

2.45 This already serious situation would undoubtedly be exacerbated by the adoption of the currently draft Conservation Area Appraisal, as this would extend the conservation area north westwards to take in the land at Brantwood House.

- 2.46 The result of this adoption would be that the land covered by Policy CSA22 would all but adjoin the northern boundary of the South Stoke Conservation Area for a distance of no less than 200 metres in the north west corner. The limit of development would be separated from this designated heritage asset by the width of an agricultural trackway.

Section 3

Ecology and Nature Conservation

Introduction

- 3.1 The following paragraphs review Bath and North East Somerset's *Schedule of Core Strategy Amendments* (November 2013) insofar as they relate to Policy CSA22 *Land adjoining Odd Down, Bath: Strategic Site Allocation* and the proposed wider Green Belt release in the area. In particular consideration has been given to the potential impacts of residential development within the strategic site on valuable ecological receptors, which have been identified through a desk-based review of the site and its surroundings.
- 3.2 The information sources consulted for this review include the following:
- Bristol Regional Environmental Records Centre (BRERC);
 - DEFRA's Multi-Agency Geographic Information for the Countryside (MAGIC);
 - National Biodiversity Network (NBN) Gateway; and
 - HRA Review of All Proposed Policy Changes to the Submitted Core Strategy (March 2013).

Planning Policy Context

- 3.3 Planning policies of particular relevance to ecological matters include Section 11 (*Conserving and Enhancing the Natural Environment*) of the NPPF and the following Saved Policies of the Bath and North East Somerset Local Plan (Adopted 2007):

Table EDP 1: Relevant Saved Policies contained within the Local Plan.

Policy No.	Name
NE.4	Trees and woodland conservation
NE.8	SSSIs
NE.9	Locally important wildlife sites
NE.10	Nationally protected species and habitats
NE.11	Locally important species and habitats
NE.12	Natural features: retention, new provision and management

Designated Sites

- 3.4 The site is not covered by any statutory or non-statutory designations. However, a number of designated sites are located in close proximity as discussed further below.

Statutory Designations

- 3.5 Bath and Bradford on Avon Bats Special Area of Conservation (SAC), is located approximately 600m north west of the site at its nearest point (see **Plan EDP 1**). This European site comprises a number of component Sites of Special Scientific Interest (SSSIs), the nearest of which is Combe Down and Bathampton Down Mines SSSI.
- 3.6 This SAC contains *"hibernation sites associated with 15% of the UK greater horseshoe bat Rhinolophus ferrumequinum population and is selected on the basis of the importance of this exceptionally large overwintering population"*. This SAC also contains important roosting sites for lesser horseshoe (*Rhinolophus hipposideros*) and Bechstein's (*Myotis bechsteinii*) bats, thereby supporting three of the four 'Annex II' bat species (i.e. those of greatest conservation concern at a European level) found in the UK.
- 3.7 Whilst the site does not necessarily contain a large quantity of high quality bat foraging habitats, it is located between the SAC roost sites and higher quality habitats further south. Thus, inappropriately designed development has the potential to fragment and interfere with commuting and/or migration routes for the Annex II bat species named above, through direct habitat loss and/or light pollution (to which the species in question are particularly sensitive). Without sufficient mitigation, these impacts could adversely affect the integrity of Bath and Bradford on Avon Bats SAC and its component SSSIs. Such impacts could, therefore, contravene relevant legislation (Conservation of Habitats and Species Regulations 2010; and Wildlife and Countryside Act 1981 as amended) and planning policy requirements (NPPF; and saved Local Plan policy NE.8).
- 3.8 The potential impacts are recognised by the *"Ecological Requirements"* of Policy CSA22, which include *"protection of dark skies to the south and east"* and limiting light spill to *"no more than 1 lux (equivalent to a moonlit night)"* on key habitats. Policy CSA22 also requires that *"particular attention is given to ensure satisfactory compensation, mitigation and protection of European protected bat species and their habitat"*.
- 3.9 Potential impacts of the site allocation on the SAC are also considered within a Habitat Regulations Assessment (HRA) Review of All Proposed Policy Changes to the Submitted Core Strategy (March 2013). This review concludes that *"on the assumption that all development requirements are secured and properly implemented, the likelihood of a significant effect on the SAC....is excluded in relation to these policy changes."*
- 3.10 While it is recognised that it is technically possible to meet the requirements set out in Policy CSA22, these are significant constraints to the design. Therefore there remains

considerable uncertainty at this stage in the process over whether a sufficiently sensitive design can be achieved whilst delivering the 300 units for which the site is allocated.

- 3.11 In relation to European sites (including SACs), paragraph 119 of the NPPF states *"The presumption in favour of sustainable development (paragraph 14) does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined"*.

Non-statutory Designations

- 3.12 A total of seven Sites of Nature Conservation Importance (SNCI) are located within 1km of the proposed strategic allocation and wider proposed Green Belt release, as shown on **Plan EDP 1**. To varying degrees these could each suffer indirect adverse impacts as a result of increased recreational pressure following new housing development. Two of these SNCIs are at particular risk of adverse impacts by virtue of their location adjacent to the site's boundaries, namely Fuller's Earth Works - Southstoke complex SNCI and Wansdyke Footpath SNCI.
- 3.13 Fuller's Earth Works - Southstoke complex SNCI lies directly adjacent to the CSA22 strategic site along the entirety of its southern and western boundaries. The interest features of this SINC are listed as *"Ancient woodland, planted broadleaved and mixed woodland, unimproved calcareous grassland, unimproved and semi-improved neutral grassland, scrub, standing water (pond) and running water (stream) with associated marginal habitats"*.
- 3.14 The *Concept Map* for the site illustrates a buffer zone of strategic planting, which has already been planted, along the site's southern edge. However, no buffer planting is shown (or exists) on the western site boundary, beyond which lies a grassland field which is part of the SNCI. Thus, adverse impacts on this SNCI resulting from disturbance and increased access, particularly on the western boundary, remain a concern.
- 3.15 Wansdyke Footpath SNCI covers the footpath and associated habitats adjacent to the site's northern boundary and extends further west totalling approximately 1.2km in length. The interest features of this linear corridor SINC are listed as *"Unimproved neutral and calcareous grassland, scrub and hedges"*. This linear habitat corridor currently provides a 'green infrastructure link' across the southern edge of Bath, with only limited development (housing estate accessed off Sulis Manor Road) further south. Even if this link can be left intact by development in the site, e.g. through avoiding breaches in the northern boundary hedgerows, there is no doubt that it would be weakened as a wildlife corridor as a result of the proposed development.

Habitats and species

- 3.16 Based on species records in the vicinity and the habitats present on site, the site is potentially capable of supporting the following species/species groups:

Table EDP 2: Protected/notable species potentially occurring within the site and surroundings.

Species	Habitat Features	Conservation Status
Bats	Buildings and mature trees (roosting); mature hedgerows and tree lines (foraging and commuting)	Legally protected at European and UK levels; UK and Local Biodiversity Action Plan priority species.
Dormouse	Mature hedgerows and tree lines (breeding, hibernation and dispersal)	Legally protected at European and UK levels; UK and Local Biodiversity Action Plan priority species.
Badger	Mature hedgerows and tree lines (sett building); grassland and arable (foraging)	Legally protected at UK level.
Birds	Hedgerows, trees, grassland and arable (breeding, foraging and overwintering)	Legally protected at UK levels; Red and Amber Lists of UK Birds of Conservation Concern; UK and Local Biodiversity Action Plan priority species.
Reptiles	Hedgerows and rough grass (foraging and dispersal)	Legally protected at UK levels; UK and Local Biodiversity Action Plan priority species.
Invertebrates	Hedgerows, trees, grassland and arable (breeding, foraging and overwintering)	UK and Local Biodiversity Action Plan priority species.

- 3.17 Paragraph 109 of the NPPF requires the planning system to conserve and enhance the natural environment by:

"...minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures".

- 3.18 In view of the above, development at the site would need to not only consider impacts on biodiversity within its boundaries; i.e. potential net losses of habitats and species; but also impacts on the ecological networks of which the site currently forms part. This would thus impose a further constraint the deliverability of both the allocated and potential full quantum of development within the site.

Appendix EDP 1
Appendix 3 to the B&NES Core Strategy/Placemaking Plan
Additional Evidence Heritage Asset Study
(September 2013)

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Appendix 3: Odd Down, Bath

Location

- 3.1 This greenfield site is situated on the plateau to the south of the city of Bath. The site is to the south of the settlement boundary at Odd Down. Part of the site (Sulis Manor and garden) is within the World Heritage Site boundary, and the rest is adjacent to it (see **Figure A3.1**).

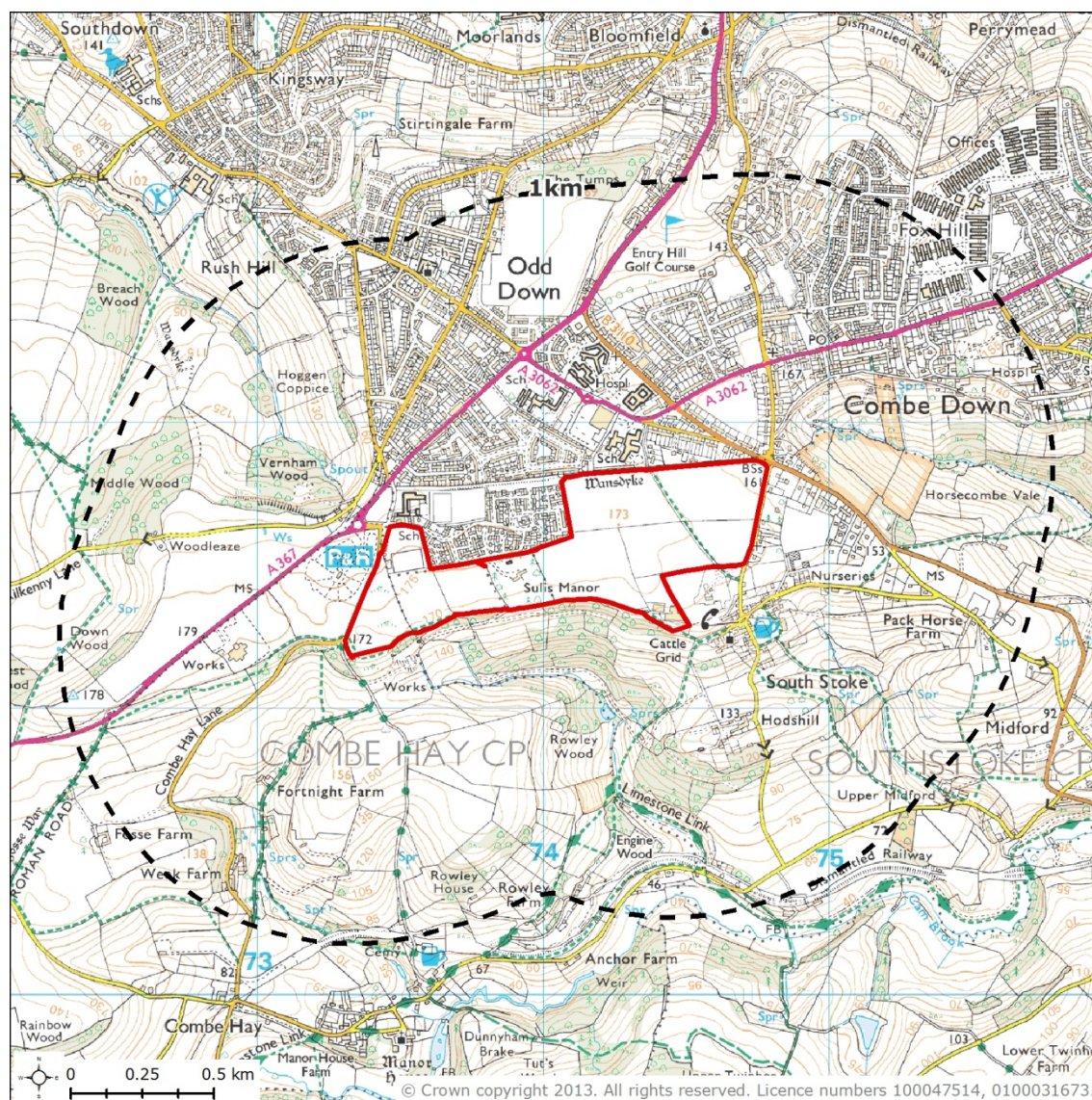


Figure A3.1: Odd Down - Proposed Development Site Location Plan

Planning Context

- 3.2 The proposed development site consists of ten fields, four to the west of Sulis Manor and gardens, and a further six to the east. There are a number of large agricultural buildings in the most south easterly of these fields. Sulis Manor and gardens are also included within the development area.

- 3.3 The Core Strategy consultation document identifies the site for residential-led mixed use development of around 300 dwellings in the plan period.
- 3.4 The site is situated across a broadly level plateau, lying at 165-175m above sea level with a slight fall from south towards the north east. The topography of the area slopes down steeply beyond the southern boundary of the site. Field boundaries are marked by dry stone walls and boundary trees.
- 3.5 Adjacent to the north is the suburb of Odd Down. The South Stoke Conservation Area is situated to the southeast, open pasture and woodland of the Cam Valley to the south, and Odd Down Park and Ride to the west.



Photograph A3.1: View looking southwest from the Wansdyke

- 3.6 The Wansdyke Scheduled Ancient Monument (**Photograph A3.2**) runs east to west along the northern boundary of the site along the rear of properties which create the existing settlement edge.



Photograph A3.2: The Wansdyke, looking north-west

Sources of Evidence

- 3.7 The following sources of evidence were consulted in the preparation of this appendix.

Bath & North East Somerset Historic Environment Record

- 3.8 In summary, the Historic Environment Record (HER) contains the following records within the study site and a 1km zone around it:
- 2 Scheduled Monuments, both sections of the Wansdyke (HER ref. DBN 151 and DBN 153)
 - 83 non-designated sites or find-spots
 - 26 archaeological 'events' (fieldwork, assessments etc)
 - 1 locally-designated Park and Garden, Midford Castle (DBN3610)
 - 1 site on the SHINE (Selected Heritage Inventory for Natural England) register, earthworks of medieval occupation north of Hoggen Coppice (DBN 3718)

Cartographic evidence

- 3.9 The following maps were examined:
- South Stoke parish Tithe Map, 1841
 - Combe Hay parish Tithe Map, 1839
 - 1st Edition Ordnance Survey 1:10560 map 1888
 - 2nd Edition Ordnance Survey 1:10560 map 1901-05
 - 3rd Ordnance Survey 1:10560 map 1920-33
- 3.10 The observations made on the maps and plans examined are summarised in **Table A3.1** below.

Table A3.1: Summary of cartographic observations

Map	Date	General Observations	Figure . No.
<i>Tithe Map of Parish of South Stoke</i>	1841	<ul style="list-style-type: none"> The study site is depicted as comprising numerous field parcels. 'Portion of the Wansdyke' marked along the northern edge of the study site. Two buildings depicted in south-east corner of the study site. 	A3.2
<i>Tithe Map of Parish of Combe Hay</i>	1839	<ul style="list-style-type: none"> The study site includes a single field parcel within Combe Hay parish. No buildings within the field. 	
<i>1st Edition 1: 10560 OS plan.</i>	1888	<ul style="list-style-type: none"> The study site appears largely unchanged. The boundary between S. Stoke and Combe Hay parishes divides the western field from the rest of the site A fuller's earth work is shown just outside the site adjacent to the Wansdyke. 	A3.3
<i>2nd Edition 1: 10560 OS plan.</i>	1901 - 1905	<ul style="list-style-type: none"> The study site appears largely unchanged. A smithy is shown on the north-east corner of the site There is an old mine shaft at the south-west corner, and is probably within the site. 'Quarry' and 'Old quarry' are just outside the site to east and west respectively. Small quarry on the north side of Wansdyke, outside the site. 	A3.4
<i>3rd Edition 1: 10560 OS plan.</i>	1920 - 1933	<ul style="list-style-type: none"> The study site appears largely unchanged. The quarries to the east and west no longer shown active. Quarry adjacent to Wansdyke much enlarged. 	A3.5



Figure A3.2: Tithe Map of Parish of South Stoke (1841)

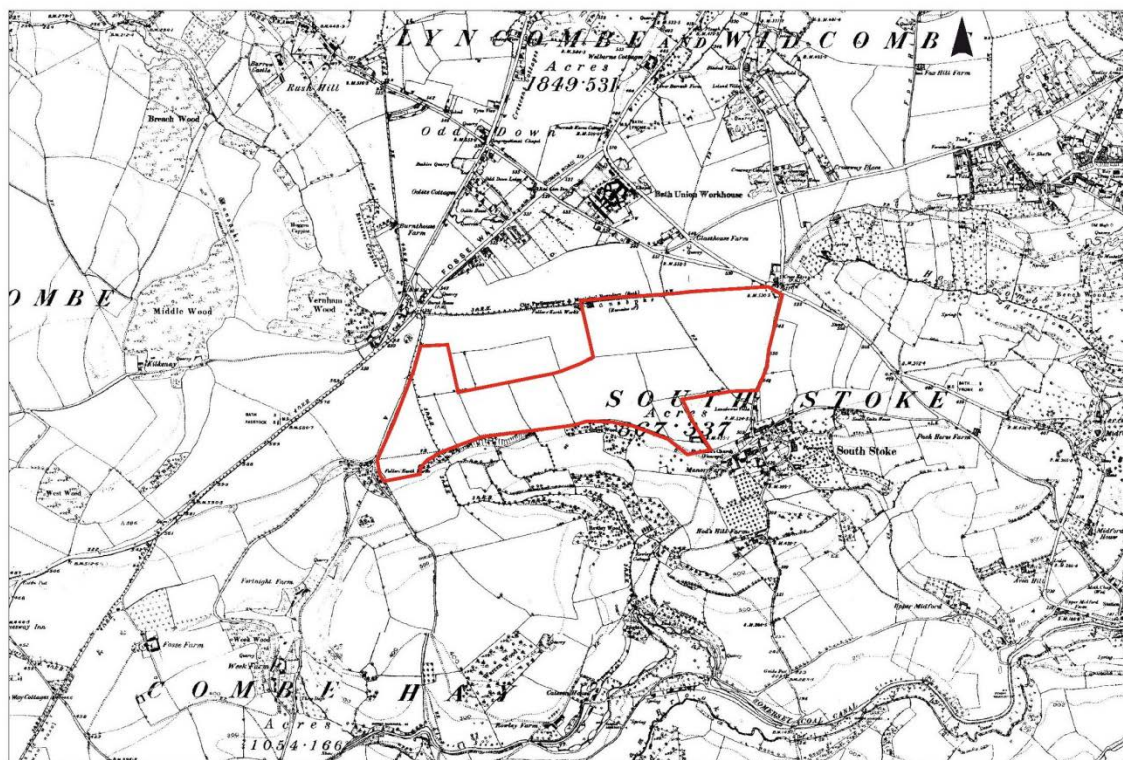


Figure A3.3: 1st Edition OS Plan (1888)

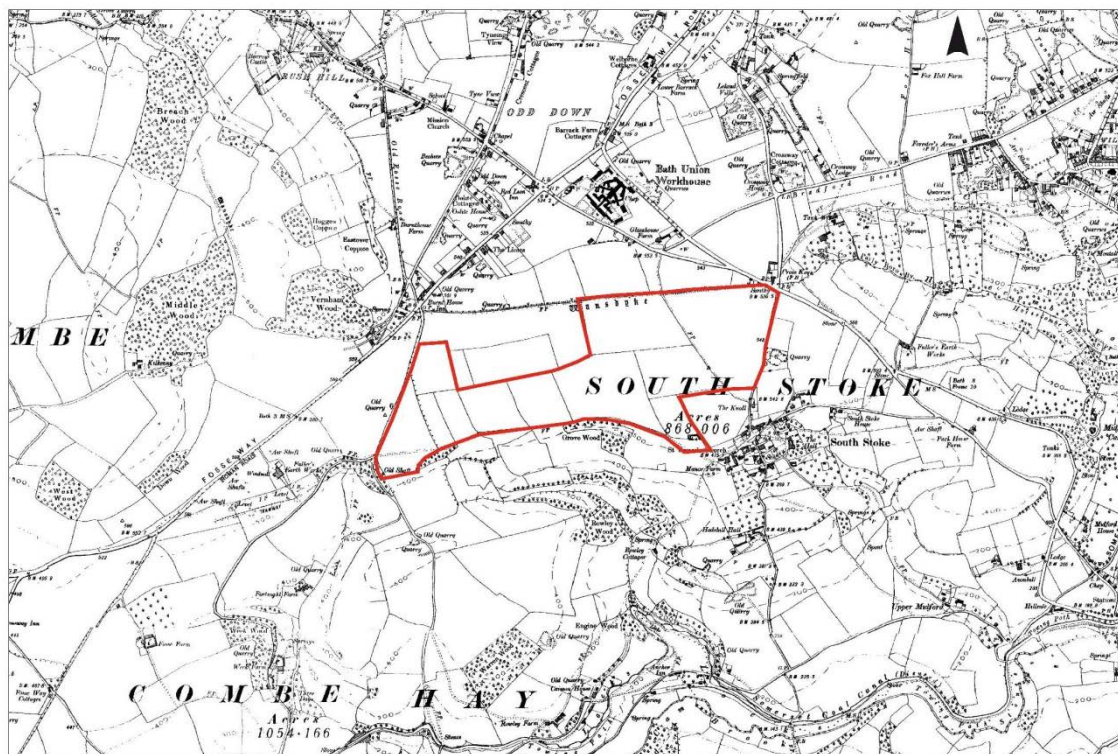


Figure A3.4: 2nd Edition OS Plan (1901-1905)

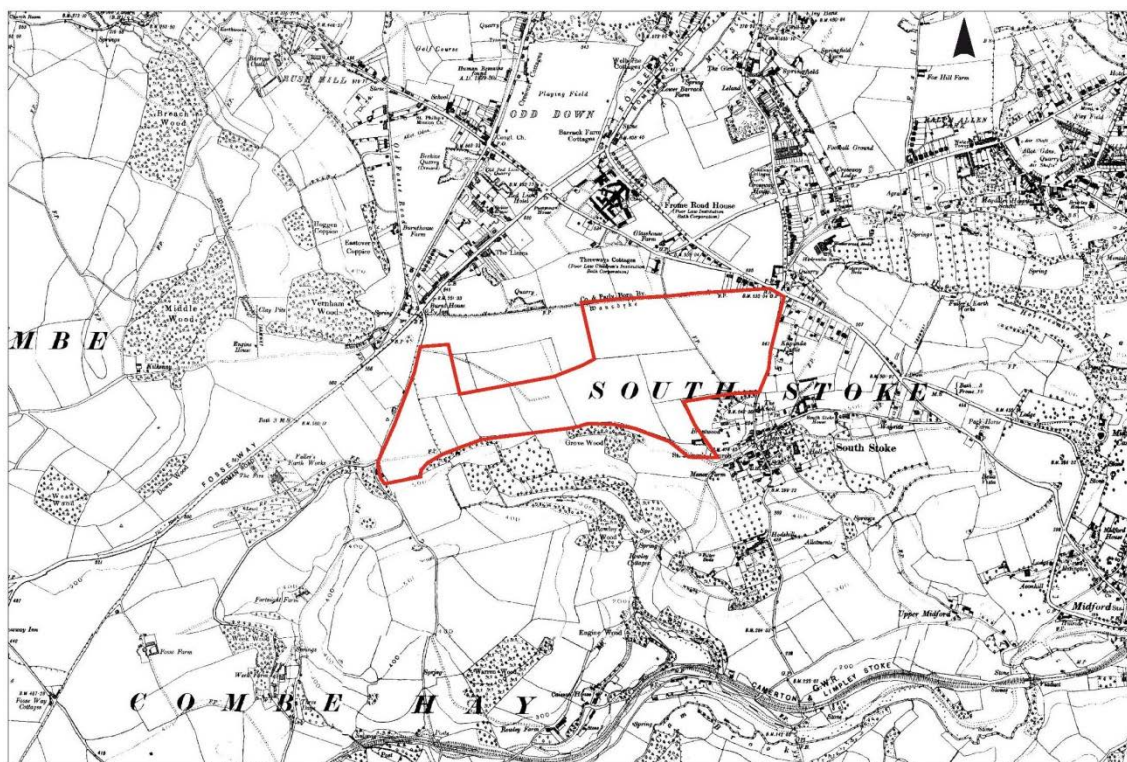


Figure A3.5: 3rd Edition OS Plan (1920-1933)

Air Photographs

- 3.11 An examination of air photographs held by the English Heritage Archive at Swindon was carried out, based on a 1km radius around the approximate centre of the site. A representative selection of these was examined, listed below. No significant features were identified within the study area, although the Wansdyke is visible on the north boundary.

Table A3.2: List of air photographs examined

Sortie number	Library number	Frame number	Date
RAF/106G/UK/579	33	6012	August 1945
RAF/106G/UK/579	33	6014	2 August 1945
RAF/106G/UK/579	33	6016	2 August 1945
RAF/3G/TUD/UK/25	168	5107	14 January 1946
RAF/3G/TUD/UK/25	168	5108	14 January 1946
RAF/106G/UK/1276	232	5123	23 March 1946
RAF/106G/UK/1276	232	5124	23 March 1946
RAF/106G/UK/1276	232	5125	23 March 1946
RAF/106G/UK/1276	232	5126	23 March 1946
RAF/CPE/UK/2144	675	5186	10 June 1947
RAF/CPE/UK/2144	675	5187	10 June 1947
RAF/CPE/UK/2476	2809	7162	10 March 1948
RAF/CPE/UK/2476	2809	7164	10 March 1948
RAF/CPE/UK/2476	2809	7166	10 March 1948
RAF/CPE/UK/2281	6209	5140	1 September 1947
RAF/CPE/UK/2281	6209	5142	1 September 1947

RAF/CPE/UK/2281	6209	5144	1 September 1947
RAF/HLA/445	8461	142	27 April 1942
RAF/HLA/445	8461	143	27 April 1942
OS/68161	11495	155	10 June 1968
OS/68161	11495	276	10 June 1968
OS/68161	11495	277	10 June 1968

Historic Landscape Characterization for the former County of Avon.

- 3.12 The site lies within the Late Medieval enclosed open fields created by local arrangement and exchange, the Post-medieval designed ornamental landscapes and the Late Medieval enclosure of steep-sided cultivation Historic Landscape Character Areas (HLCA), as classified by the Avon Historic Landscape Characterisation. **Figure A3.6** shows the Historic Landscape Character Areas within 1km, **Table A3.3** provides a key.

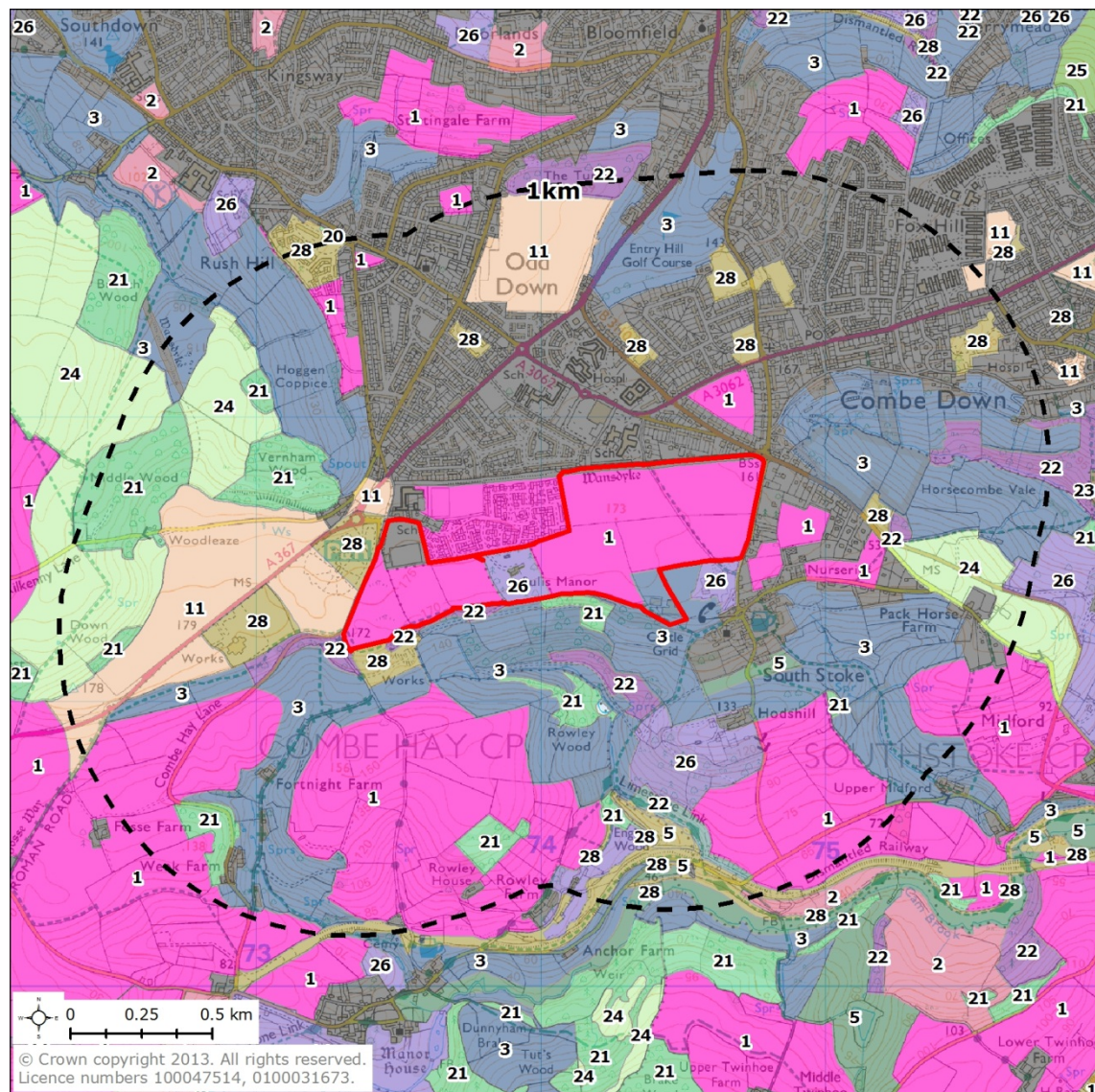


Figure A3.6: HLCA within 1km of Odd Down site

Table A3.3: Odd Down HLCAs

Number	Historic Landscape Character Area
1	Late medieval enclosed open fields created by local arrangement and exchange
2	Post-medieval and modern fields adjusted from earlier (i.e.A1) enclosures
3	Late medieval enclosure of steep-sided cultivation
5	Medieval (or earlier) enclosure of rich, wet grassland
11	Post medieval (18th - 19th C) parliamentary enclosure
18	Medieval and Post-medieval organised enclosure of open heath
20	18th - 19th century enclosure by local and parliamentary act
21	Pre 1800 'ancient woodland
22	Post-18th century woodland plantation and forestry
23	Medieval enclosed fields created by assart
24	Medieval enclosed fields created by organised clearance
25	Post-medieval fields created from enclosure of medieval parkland
26	Post-medieval designed ornamental landscapes
28	Large scale utility landscapes

3.13 The main characteristics of these HLCAs are as follows:

Late Medieval enclosed open fields created by local arrangement and exchange:

*"Fields of relatively small size and regular in outline, and generally follow the natural lie of the land..."*¹

Post-medieval designed ornamental landscapes

*"Aesthetically placed tree plantations and avenues, frequently containing (in the later examples) exotic species. Artificial lakes, cascades and other water features. Follies, grottoes, lodges, and other built ornaments and monuments."*²

Late Medieval enclosure of steep-sided cultivation:

*"...techniques employed to plough or cultivate steep slopes during the middle ages resulted in a variety of terraces and other fieldworks which followed the natural contours..."*³

Other documents:

3.14 The following documents were also referred to:

- Bath & North East Somerset Council (2011) South Stoke Conservation Area Appraisal
- Bath & North East Somerset Council (2013) Core Strategy Update
- Colvin, H (1954) A Biographical Dictionary of British Architects 1600-1840
- English Heritage (2008) Conservation Principles: policies and Guidance for the Sustainable Management of the Historic Environment
- English Heritage, The National Heritage List
- English Heritage (2011) The Setting of Heritage Assets
- Forsyth, M (2004) Bath: Pevsner City Guide
- Pevsner, N (1958) The Buildings of England: North Somerset and Bristol
- Arup, 2013. *Odd Down Development Concept Options Report* Available from <<http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/ConceptOptions/COR-Odd-Down.pdf>> [Accessed 8th August 2013]
- Bath and North East Somerset Council, May 2012. *City of Bath World Heritage Site Setting SPG*

¹ Page 5 Mike Chapman, 1997. *Avon Historic Landscape Classification* (first draft) 1995-8.

² Page 11 Mike Chapman, 1997. *Avon Historic Landscape Classification* (first draft) 1995-8

³ Page 7 Mike Chapman, 1997. *Avon Historic Landscape Classification* (first draft) 1995-8

Site Inspection

- 3.15 The study site was inspected on the 5th, 6th, 8th and 14th of August 2013. It comprises a very gently sloping plateau on the southern edge of Odd Down that ranges between 170 and 175m AOD in height which is predominantly used as arable farmland.



Photograph A3.3: Centre of the study site, looking north-west

- 3.16 The site is bounded by early 20th century, post-war and modern housing to the north, ancient woodland to the south and minor roads to the east and west. Field boundaries within the site are defined by hedges with mature trees, fences, stone walls and belts of recently planted trees.
- 3.17 There is a large detached 1930s building known as Sulis Manor in the centre of the study site. This building is set within a large, partially wooded, garden, and is currently used as a language school. There is also a group of large modern barns in the south-east corner of the site, which are set within an enclosure of rough grassland.
- 3.18 The northernmost edge of the site is bounded by the Wansdyke (**Photograph A3.4**), which survives as a linear earthwork that has been partially encroached upon by the rear gardens of houses fronting Old Frome Road and Midford Road. Some erosion was noted where footpaths cross the monument. There were no other visible archaeological features within the study site. The modern housing to the west of the site maintains an undeveloped buffer zone between the rear gardens of the new houses and the monument.



Photograph A3.4: The Wansdyke – encroachment by garden boundaries, looking east

- 3.19 The sports ground at the north-west of the site was not inspected as it was added to the study site late in the project.

Overall Heritage assets

- 3.20 This section considers heritage assets which lie on and within 1km of the site which have been identified as the key assets for consideration.
- 3.21 **Figure A3.7** shows the heritage assets situated within 1km of the proposed site boundary.

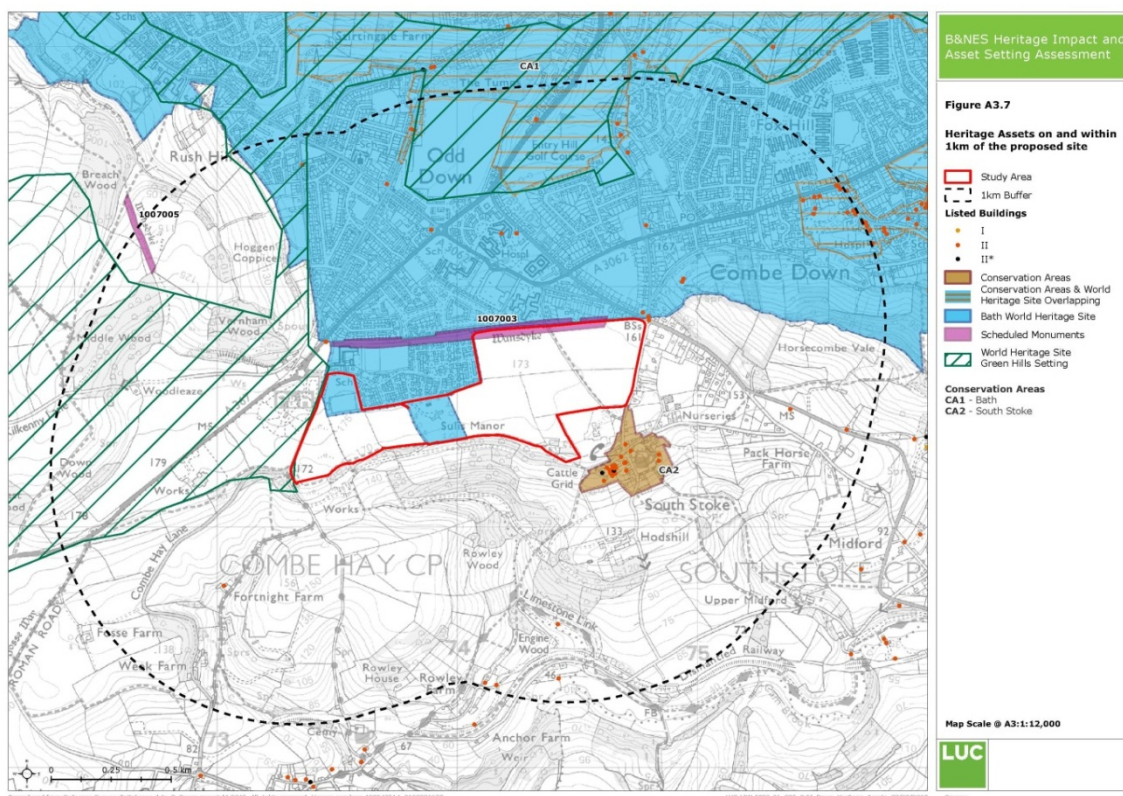


Figure A3.7: Heritage Assets on and within 1km of the proposed site

3.22 The following table (**Table A3.4**) details the heritage assets on site and within 1km.

Table A3.4: Odd Down, Heritage Assets within 1 km of the proposed site

Heritage Asset	On site	Local area (within 1km)
Listed Buildings		
Grade I	0	0
Grade II*	0	2
Grade II	0	63
Scheduled Monuments	0	0
Registered Parks and Gardens	0	0
Conservation Areas	South Stoke	Bath

3.23 Heritage Assets within the wider area (5km) have not been considered in detail as part of this study. However, **Table A3.5** provides an overview of assets within this area.

Table A3.5: Odd Down, Heritage Assets within 1-5km of the proposed site

Heritage Asset	Wider Context (within 5km)
Listed Buildings	
Grade I	118
Grade II*	137
Grade II	2386
Scheduled Monuments	18
Registered Parks and Gardens	11
Conservation Areas	Bath

3.24 **Figures A3.8 and A3.9** show the Zone of Theoretical Visibility (ZTV) of the site in relation to a potential two storey and three storey development on the site. The ZTVs provide a

representation of where development on the site could be seen from within the surrounding area – indicating what proportion of the site can be seen.

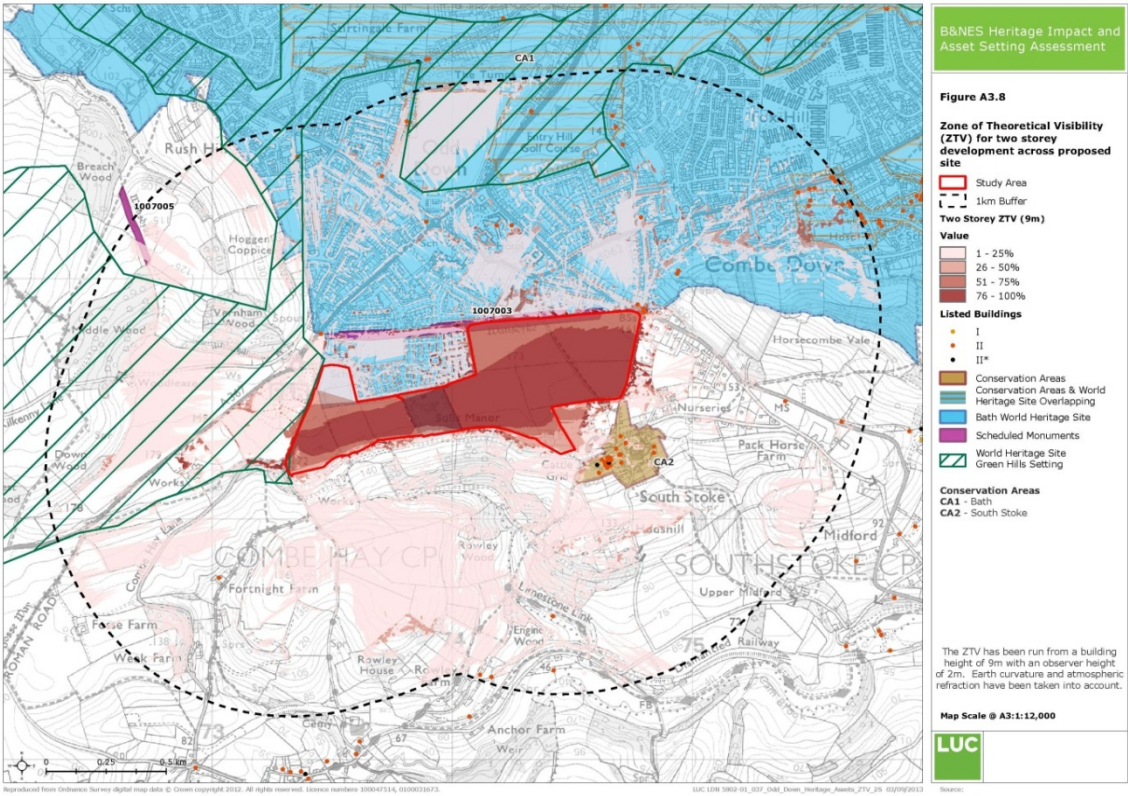


Figure A3.8: Zone of Theoretical Visibility (ZTV) for two storey development across proposed site

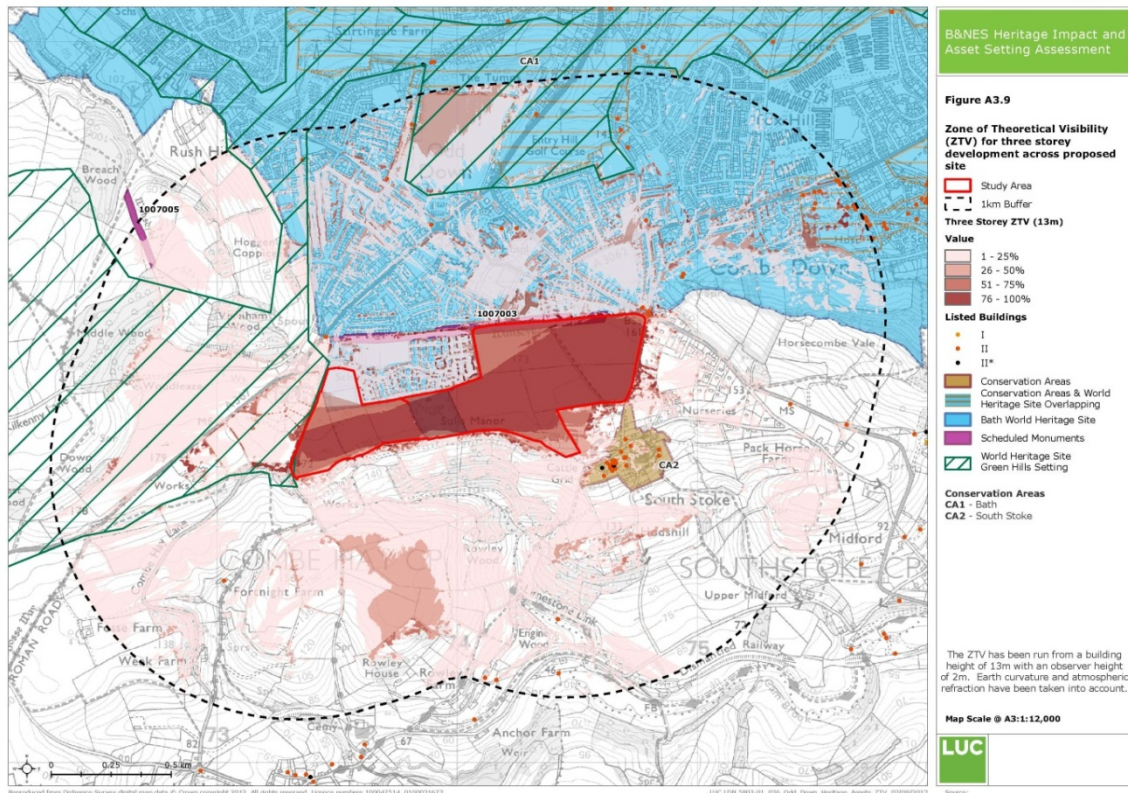


Figure A3.9: Zone of Theoretical Visibility (ZTV) for three storey development across proposed site

Archaeological Evidence

Historical Context

- The study site mainly lies in the parish of South Stoke, with a small western portion in Combe Hay. The parish of South Stoke is not yet covered by the Somerset *Victoria County History*, but a recent account is that by Parfitt (2001). South Stoke, in common with a number of other parishes surrounding Bath, lay within the Hundred of Bathforum, meaning the *forinsecum*, or foreign hundred of Bath (Keevil 1996, Fig. 1).
- There is substantive evidence for human activity in the Bath area from prehistoric times, including the Iron Age site of Hayes Wood in Limpley Stoke to the east of the study site and Berwick Camp to the north (Aston 1986, Fig. 3).
- South Stoke's close proximity to the Roman town at Bath, *Aquae Sulis*, is reflected in evidence for Roman activity (Aston 1986, Fig. 4) and subsequently in the Anglo-Saxon and medieval periods (Aston 1986, Figs 5-7). The name South Stoke is thought to derive from the Old English "*Sudstoca*" ("*stoc*" referring to an outlying farmstead or dependent settlement and "*sud*" meaning south).
- In Anglo-Saxon times, the South Stoke estate appears to have formed part of the 8th-century Monastery of St Peter in Bath, but for a time was leased to a person by the name of Totta. A Royal Charter of AD 961 appears to account the ordering of the estate's (of 5 hides) return to St Peter's by King Edgar. The Wansdyke, or "Woden's Dyke", probably a territorial boundary marker, is a linear bank and ditch thought to date to the Anglo-Saxon period and presently occupies a part of the northern boundary of the study site, partly separating it from the parish of Lyncombe with Widcombe. Originally, the Lyncombe with Widcome/South Stoke parish boundary continued westwards along the section of the Wansdyke to the north of the study

site but was altered by the Bath Extension Act in 1950, and now skirts around the built-up area comprising St Gregory's School and the Sulis Meadows estate.

- The Monastery of St Peter was surrendered to the Crown at the Dissolution, in AD 1539. Following various leases, the estate was then given to Edward Montagu, 1st Earl of Sandwich, by King Charles II in 1660.
- The parish comprised mainly land in mixed-agricultural and market gardening use until the 20th century, although mining activity in the form of Fuller's Earth extraction took place from the mid-19th century. The Somersetshire Coal Canal, constructed between 1795 and 1805, passed through the parish. Further industrial developments in the parish in the 19th and 20th centuries include the construction of the Somerset and Dorset Railway and an extension to the GWR respectively.

Archaeological Evidence

Designated assets

- Part of the northern boundary of the study site follows part of the Anglo-Saxon linear Scheduled Monument known as the West Wansdyke (MBN6035 / DBN151 / SAM ref. 100703 / old SAM ref. BA 93). This section of the dyke is also on the Heritage at Risk Register (DBN 3754).
- There are three designated assets in the wider study area. Just under 1km to the north-west is another Scheduled section of the Wansdyke (MBN6031 / DBN153 / SAM ref. 1007005 / old SAM ref. BA95). Earthworks of medieval occupation north of Hoggen Coppice are on the SHINE (Selected Heritage Inventory for Natural England) register, (MBN1718 / DBN 3718). The grounds of Midford Castle are a locally-designated Park and Garden (MBN4251 / DBN3610), a small section of which extends into the eastern edge of the wider study area.

Chronology of assets

Prehistoric

- Finds of prehistoric worked flint (MBN4749, MBN1786 & MBN30217) are common on the downs to the south of Bath, some of which (MBN11020) have been found within the site. The flints from the study site range in date from Late Upper Palaeolithic/Mesolithic through Neolithic to Bronze Age.
- The remains of a late Bronze Age/early Iron Age occupation site with evidence of pottery manufacturing were uncovered during an excavation (MBN1791-2) immediately to the south of the site.
- Evidence of later prehistoric activity in the wider area includes a probable (now destroyed) Iron Age enclosure at Berwick Camp (MBN1797) and finds of Bronze Age pottery to the south of South Stoke (MBN1800).
- The modern A367 follows the line of the Roman Fosse Way, part of which (MBN10248) may have followed the line of an existing prehistoric route.

Roman

- Although there is no direct evidence of any Roman activity within the site itself, archaeological excavations immediately to the south (MBN 1791-2) uncovered remains of a stone and timber building, which was associated with 2 stone-coffined inhumation burials and evidence of glass, metal, and possibly pottery manufacturing. The site appears to have been occupied between the 2nd and 5th centuries AD.
- The evidence for Roman activity in the wider study area is extensive, and includes occupation sites at Hoggen Coppice (MBN1786) and South Stoke (EBN2918-20, MBN4723, MBN11844, MBN11847), stone-coffined inhumation burials (MBN1790, MBN1798, MBN1800 & MBN4947), a stone quarry (MBN30245), and isolated finds of coins (MBN4622, MBN30196).
- The A367 to the south of Odd Down follows the line of the Fosse Way (MBN6056) which was a major Roman road that ran from Exeter (*Isca Dumnoniorum*), through Bath (*Aquae Sulis*) to Lincoln (*Lindum Colonia*). The line of the road to the north of Odd Down is unclear, but it may

have followed the line of modern Bloomfield Road (MBN10247) and/or Old Fosse Road (MBN10167).

Anglo-Saxon

- The Wansdyke (MBN6001, MBN6031-6) is a 14km long linear bank and ditch, which probably functioned as a territorial marker. It is believed to have been constructed between the 5th and 7th centuries AD and extends between Maes Knoll to the west and Odd Down. Part of the Wansdyke survives as a substantial earthwork that lies within and along the northern boundary of the study site; this section is a Scheduled Monument (SAM 1007003; old number BA93).

Medieval

- There is no evidence of any significant medieval occupation within the site.
- The Historic Landscape Characterisation defines the site as being within an area of post-medieval enclosures of medieval open fields. The site was probably devoted to agriculture rather than settlement, although small ancillary buildings may have been present.
- The evidence for medieval activity in the 1km study area includes St James' Church (MBN1799), a tithe barn (MBN2677), and possible fishponds (MBN6676) in South Stoke village, and earthworks representing a deserted medieval farmstead at Hoggen Coppice to the north-west of the site (MBN1785/DBN3718).
- There are a number of ancient woodlands (MBN11159-60, MBN11185, MBN11188-9, MBN11194-6) in the surrounding area, most if not all of which are likely to be at least medieval in origin.

Post-medieval and modern

- There is a small group of (probably) agricultural buildings in the south-eastern corner of the study site that are depicted on the South Stoke Tithe Map of 1841. These are also shown on the Ordnance Survey maps examined, but have been demolished and replaced by large modern farm buildings.
- Apart from Sulis Manor, which was built in the 1930s, there is no evidence of any other post-medieval or modern activity within the study site. Sulis Manor Garden (MBN10316) was laid out in the 1930s; the HER notes this as a 'probable' candidate for SHINE designation.
- The evidence for post-medieval/modern activity in the wider study area includes farms (MBN2333, MBN2676-8, MBN10130/MBN11210, MBN8479), public houses (MBN2679, MBN10140, MBN10259), places of worship (MBN10210 & MBN11793), a workhouse (MBN7898, EBN2975), and a brewery (MBN5447).
- Odd Down and Combe Down were extensively quarried and mined for oolitic limestone and fullers earth. The evidence for extractive industry in the wider area includes a mine shaft (MBN11714) near the northern boundary of the study site, oolitic limestone quarries and mines (MBN3430, MBN10104, MBN 3429) and fullers earth works (MBN3032, MBN4032, MBN6157-8, MBN 9849, & MBN10493). Some are visible on the early Ordnance Survey maps (see 3.2.2 above). It is possible that small-scale extraction took place within the study site, but remained un-mapped. Evidence of other industrial activity includes a lime kiln (MBN5651), a glassworks (MBN5839), and a canal (MBN6210, MBN 8151).
- There are three formal burial grounds (MBN10106, MBN30177, MBN30348) in the wider study area. Undated human bones (MBN1788) uncovered in Bloomfield Road may be the remains of people executed at a nearby post-medieval gibbet (MBN10250).
- There are two Second World War defensive structures (MBN10621, MBN9954) and an emergency hospital (MBN7898) in the surrounding area.

Undated

- Various undated earthworks (MBN11845-6 & EBN2921-3), ditches (EBN2907 & EBN3105), quarries (EBN3370), and a rabbit warren (MBN6156) have been identified during fieldwork in the surrounding area.

Other archaeological fieldwork

- Apart from fieldwalking (MBN11020, see also 4.2.1 above), there has been no archaeological fieldwork within the site. Investigations in the surrounding area have produced evidence for prehistoric and Roman or undated activity (described above). A number of archaeological watching briefs (EBN2956, EBN2981, EBN3111, EBN3253, EBN3306, EBN3354, EBN3493) and one trial-trench evaluation (EBN3342) produced no evidence of any archaeology.
- Other archaeological investigations in the surrounding area include desk-based assessments (EBN2844, EBN3241 & EBN3310), geophysical surveys (EBN3307, EBN3381) and a building survey (EBN2974).

Potentially important hedgerows

- By far the most significant boundary feature within the study site is the Wansdyke, which survives as an earthwork that has existed since the Anglo-Saxon period.
- The boundary between the two westernmost fields is shown on the tithe maps, and also forms the boundary between South Stoke and Combe Hay parishes.
- Subject to detailed investigation, any hedgerows on these boundaries may therefore be classed as important under the Hedegrow Regulations.

Potential for unknown archaeological assets within the study site

- 3.25 The potential for unknown prehistoric assets is considered to be high. A number of assets are already known from the study site and its immediate vicinity, and chance finds of artefacts indicate activity in most of the prehistoric periods. The fieldwalking finds include material dated to the palaeolithic and mesolithic periods. Evidence of these periods is commonly found only as artefact scatters. The later material, and the known late Bronze Age/early Iron Age occupation immediately to the south suggests the possibility of similar settlement evidence within the site.
- 3.26 Although there are no currently-known Roman assets within the study site, the potential is considered to be high. Occupation is known immediately to the south. There will almost certainly be at least field systems associated with this occupation, and possibly also other similar foci of occupation.
- 3.27 The Anglo-Saxon period is represented within the study site by a section of the intermittent linear Scheduled Monument known as the West Wansdyke. It consists of a bank with a ditch on the north side and extends from Maes Knoll hillfort in the west to Odd Down. Geophysical surveys have shown that ditches along much of its length that survive as buried features where not visible on the surface, and enclosures adjoining the alignment further to the north-west have been suggested by fieldwork carried out for the *West Wansdyke Management Study* (WA 2008). There is a high potential for buried remains associated with the monument itself, and adjacent to it there may be enclosures of the type known from elsewhere along its line. It was probably originally in open country. There is no other evidence of known Anglo-Saxon sites in the study area, and there is considered to be only a low potential for other remains of this period within the site.
- 3.28 The potential for medieval assets is low. The site appears to have been within fields. Evidence of field boundary ditches and possibly agricultural buildings may be present, but there is unlikely to be evidence of significant occupation.
- 3.29 There is considered to be little potential for significant post-medieval assets. Although there are remains ranging from former industrial sites to World War II defences in the wider area, none are known from the study site itself. The only known feature is the 1930s Sulis Manor Garden; although not currently designated this is noted on the HER as a potential SHINE site.

Heritage Significance of archaeological assets

- 3.30 The national importance of the Wansdyke, which forms part of the northern boundary of the site, is indicated by its designation as a Scheduled Monument. It is on the Heritage at Risk Register, mainly due to erosion caused by the use of official and unofficial footpaths.

- 3.31 The setting of the Wansdyke has been compromised by residential development to the north of the monument (Odd Down), the garden boundaries of which encroach on to it, and a smaller area of development on its southern side (Sulis Meadows estate), to the north-west of the assessment site, which have destroyed its original open aspect at these locations. However, within the assessment site the open setting to the south survives (towards South Stoke), and the aspect both to and from the monument can still be appreciated in that direction, although interrupted by modern hedge and tree-lines which restrict the more distant aspects. Archaeologically, the open aspect is an important element of the setting, illustrating the monument's position and function as a boundary marker in what was probably a relatively sparsely-settled area.
- 3.32 The only other known archaeological asset within the study site is the prehistoric flints found by fieldwalking, which indicate activity and possible occupation in the area. Later prehistoric settlement is likely to be similar to that known from the wider study area, and of regional significance.
- 3.33 The 1930s Sulis Manor and Garden are not considered archaeologically significant, although the gardens are noted as having potential for SHINE designation. Their architectural or garden importance is not considered here.
- 3.34 Apart from the Wansdyke, the known archaeological assets on the site are not considered to present any archaeological setting issues that would be affected by development on the site.
- 3.35 Of the designated assets within the wider study area, the section of Wansdyke to the north-west is Scheduled and therefore of national importance. The medieval occupation earthworks at Hoggen Coppice noted on the SHINE Register are of local or possibly regionally importance, indicating the settlement distribution in the area and will contain evidence to show the nature of the occupation. The significance of Midford Castle as a locally-designated Park & Garden is not considered here.
- 3.36 None of the designated assets in the wider study area would be directly affected by development on the site. There are not considered to be any archaeological setting issues in relation to these assets that would be affected by development on the site.
- 3.37 The study has identified potential for the presence of presently-unknown assets on the site. In the absence of fieldwork to ascertain the presence or absence of such remains, and their nature and preservation, the significance of any such remains is unconfirmed.

Historic Buildings

- 3.38 There are no listed buildings on the site, but there are 64 listed buildings within 1km of the site. Within this section historic buildings with likely intervisibility with the site and which therefore potentially may be affected by development on the site are considered.

The Cross Keys Public House

- Designation: Listed Grade II.
 - Date of designation: 1972 (revised 2010).
 - Reasons for designation: A 17th or early 18th century building modified in the mid-19th century. Use of coursed local limestone with ashlar dressings. Also, survival of sash windows with margin glazing.
- 3.39 Development: The building occupies a strategic location on a significant route leading southeast from Bristol towards Salisbury and at the junction with the turnpike from Widcombe to South Stoke. It is possible that an earlier building was replaced by the existing three-storey public house that dates from around the turn of the 17th and 18th centuries. In the mid-19th century, the building was modernised to bring it more in line with the polite architecture of Georgian Bath. This work included the addition of a two-storey central bay to the front and refenestration with margin-glazed sash windows.

Heritage values

- 3.40 Evidential – There is potential for archaeological evidence of an earlier building on the site.

- 3.41 Historical – The building is significant to the history of communications (turnpike roads) and hospitality in the area.
- 3.42 Aesthetic – The architectural quality of the Cross Keys reflects the influence of Georgian Bath and is recognised by its Grade II listing.
- 3.43 Communal – The building serves a community purpose and its listing is in the public interest.

Significance

- 3.44 The sum of the heritage values suggests a high level of heritage significance. Listing places the building in the national context.

Setting

- 3.45 The Cross Keys is clearly visible across the Odd Down site as a significant landmark. While it is traditionally associated with the road junction, it is important that it should not be overwhelmed by modern highway development.

Group of boundary markers

- Designation: Listed Grade II
 - Date of designation: 2010
 - Reasons for designation: Important survival of historical civic demarcation.
- 3.46 Development: Three markers in cast-iron and stone:
- Dated 1827 for the Bath Turnpike Trust. Cast iron post, triangular on plan with a half-pyramidal top. Raised lettering, written up the body of the post, reads: "1827/ WIDCOMBE - BATH TURNPIKE TRUST - SOUTH STOKE"
 - Dated 1912. Cast iron triangular post with half pyramidal top. Raised lettering up the body of the post reads: "CITY OF BATH/SOMERSET C.C."
 - Boundary post, probably dated 1804. Ashlar upright with semi-circular head. Incised lettering reads: "P/L AND W/(1804)"
- 3.47 The Bath Turnpike Trust, dating from 1708, was one of the earliest associations formed for the improvement of roads.

Significance and Setting:

- 3.48 The structures are socially important giving added meaning to the junction of the Midford and South Stoke Roads. However, their effect on the Odd Down site is inevitably limited by their small size and local relevance.

Other listed buildings

- 3.49 There are many listed buildings within a short distance of the Odd Down site mostly in South Stoke and the Cam valley. Generally, they are so separated from the site that they are not inter-related.

Undesignated historic buildings

- 3.50 **Brantwood House** is set within tree-lined grounds adjacent to the south east of the site. It is described in the South Stoke Conservation Area Appraisal as '*an outstanding and significant historic building in the spirit of the Arts and Crafts and of a Jacobean style using local materials and architectural detailing*'. However, it is not a listed building. The house is unseen from the Odd Down site because of the tree cover.
- 3.51 **Sulis Manor** was built of local limestone in the Cotswold style. It dates from the 1930s and is therefore quite late for its appearance and detailing. This explains why it is not a listed building. Sulis Manor has a large, almost square curtilage that divides the Odd Down site into two parts. However, the house is surrounded by dense woodland and is not apparent from beyond its boundaries.

Conservation Areas

South Stoke Conservation Area

- 3.52 Situated to the southeast of the site, designated in 1982 with extensions added in 2011.
- 3.53 Reasons for designation: A small hillside settlement overlooking the Cam valley. Consistent use of local limestone with several buildings of high architectural quality.
- 3.54 Development: There is archaeological evidence of occupation in the area from the Bronze Age. A Saxon charter of 961 gave South Stoke to Bath Priory, which may explain why it is not mentioned in its own right in the Domesday survey despite the Norman details in St James's Church. Since the Dissolution, when ownership went to the Crown, South Stoke has experienced gradual change related to its agricultural economy.

Significance

- 3.55 South Stoke is an important example of a small rural settlement that has been largely unaffected by the mass-produced developments of the 20th century.

Setting

- 3.56 Situated on a steep south-facing slope, South Stoke is very much orientated towards the Cam valley. It is lower than the Odd Down site and is separated from it by the wooded estate of Brantwood House. The site and the conservation area are not, therefore, strongly related.

Bath Conservation Area

- 3.57 Situated to the north of the site, designated in 1968 with extensions added up to 2002. The designation recognises the outstanding architectural and historical interest of Bath, including the important survival of historic fabric from the Roman, Mediaeval, Georgian and Victorian periods.
- 3.58 Development: The designation includes the successive overlays of architectural history extending into the southern suburbs of the city.

Significance

- 3.59 The Bath Conservation Area is of international importance and this is reflected in its inclusion, in its entirety, within the World Heritage Site.

Setting

- 3.60 The nearest part of the conservation area is about half a kilometre north of the Odd Down site and the area between them is considerably built up. Accordingly, there is no immediate visual or cultural relationship between the two. The only way in which development could affect the conservation area's setting would be if landscape assessments concluded that buildings would break the skyline.

Registered Parks and Gardens

- 3.61 There are no Registered Parks and Gardens within 1km of the site.
- 3.62 There is one locally designated park and garden at Midford Castle, an 18th century woodland garden, the western edges of which extend into the 1km study area.
- 3.63 Sulis Manor gardens are located on site, and are a candidate for a SHINE designation.

Bath World Heritage Site

- 3.64 The WHS boundary includes Sulis Manor and Gardens which is situated within the development site boundary. The WHS is adjacent to the potential development site's northern boundary.
- 3.65 B&NES Council carried out an LVIA study in relation to the World Heritage Site. This concludes that the significance of the impact on the WHS will vary between the various fields within the site as follows:
- Development on the sports field will have an impact of low negative significance on the WHS.
 - Development on field East 1 will have an impact of low negative significance on the WHS.

- Development on fields West 1 north and East 4 north will have an impact of medium negative significance on the WHS.
 - Development on fields West 2, West 1 south, East 4 south, East 3 and East 2 will have an impact of high negative significance on the WHS.
- 3.66 There are some parts of fields not considered in the WHS LVIA study, potentially because these areas have been planted with shelter belt trees. These are the most southern parts of West 1 south, East 4 south, East 3 and the eastern edge of East 2. The shelter belts provide an important screen to the site in views from the south which were raised as a concern in the B&NES study.
- 3.67 In addition, the *Odd Down Development Concept Options Report* carried out by ARUP considered development options. In relation to the WHS ARUP note that, "*Development would need to be kept away from the more exposed parts and the edges of the plateau to prevent the appearance of the city spilling beyond the contained hollow of Bath into rural views and the open setting of Bath.*" (ARUP page 14). ARUP note that the site is within the setting of the WHS.
- 3.68 The site is not situated within the Green Hillside (as identified in Chapter 5 of the B&NES WHS setting SPG, Figure 4 and as mapped on Figure A3.7 of this report).

Sensitivity and Risks

- 3.69 The following section summarises the sensitivity and potential risk to the significance of the heritage asset.

Archaeology

Sensitivity

- 3.70 The main existing impacts on the site are disturbance associated with the construction of agricultural buildings in the south-east corner of the site, landscaping and construction within the grounds of Sulis Manor, and ploughing in arable fields which is likely to have caused extensive, though not necessarily very deep, horizontal truncation across most of the study site. Along the northern boundary, the Wansdyke has been encroached on by garden boundaries of 20th-century housing to the north, and there has been erosion on footpaths crossing the monument, particularly on the section immediately to the west of the site.
- 3.71 The Wansdyke is a Scheduled Monument of national importance and is therefore considered to be of high sensitivity despite encroachment by modern development. There is also high potential for unknown buried remains directly associated with the Wansdyke in its immediate vicinity. These would be of similarly high sensitivity.
- 3.72 Sulis Manor and its ornamental gardens are considered to be of low sensitivity with respect to archaeology; their sensitivity in relation to architecture and historic gardens is not considered in this section.
- 3.73 The study has identified potential for the presence of unknown buried archaeological remains, particularly from the later prehistoric and Roman periods. In the absence of evaluation fieldwork to confirm the presence or absence of such assets, the nature and preservation of any that may be present, and thus their significance, it is not possible to make a definitive assessment of their sensitivity.

Risk to known and unknown archaeological assets

- 3.74 The degree of risk is a balance between the sensitivity of the asset and the degree to which it will be impacted by development. In the absence of detailed archaeological investigation and development proposals, much of the risk can only be assessed in principle at this stage.

Known archaeological assets

- 3.75 The risk to the Wansdyke from any development affecting both the monument itself and its setting, and also to associated unknown archaeological remains directly associated with it in the

immediate vicinity, is considered to be high. Thus there is a **there is a high risk to the heritage significance of the Wansdyke**. Cumulative impacts could also include increased erosion to the earthwork if access and usage increases. The risk to its setting decreases with distance and inter-visibility, becoming low to the west of Sulis Manor where modern development has already taken place between the study site and the monument.

- 3.76 Apart from the Wansdyke, no archaeological issues have been identified in relation to impacts on other known archaeological assets in the site or study area.
- 3.77 Sulis Manor and its garden, are of low archaeological sensitivity and the risk to the heritage significance of this asset is considered to be **low**.
- 3.78 Worked flints within the topsoil may be the only evidence for early prehistoric activity or, more likely for the later prehistoric periods, indicate the presence of buried remains of unknown occupation sites. Whilst their sensitivity is not known, development would have a severe or total impact, and the risk to such assets is high.

Unknown archaeological assets (buried archaeological remains)

- 3.79 The study site is considered to have high potential for unknown archaeological remains of the prehistoric and Roman periods within its overall extent. There is, however, no present evidence for major settlement sites or intensive occupation over the entire site. Later prehistoric and Roman occupation is likely to have been in the form of scattered farmsteads, but these can be expected to form localised foci and would typically be surrounded by remains associated with field systems. There is a low potential for other periods. **There is therefore considered to be a moderate risk of development encountering unknown archaeological remains**, although it is thought unlikely that the distribution of such remains will be uniform across the site.
- 3.80 In the absence of further investigation the possible presence of unknown buried archaeological remains of high sensitivity cannot be discounted, and any assessment of risk made here can only be provisional.

Historic Buildings

- 3.81 The proposed site lies to the south of the **Cross Keys Public House**, and would be visible in views looking southwards (See ZTVs in **Figures A3.8 and A3.9**). Views from the pub currently look across the open fields (see **Figure A3.10**). The building is traditionally associated with the road junction, but it is important that it should not be overwhelmed by modern highway development. See **Photograph A3.5**



Photograph A3.5: View across site from Midford Road in front of the Cross Keys public house

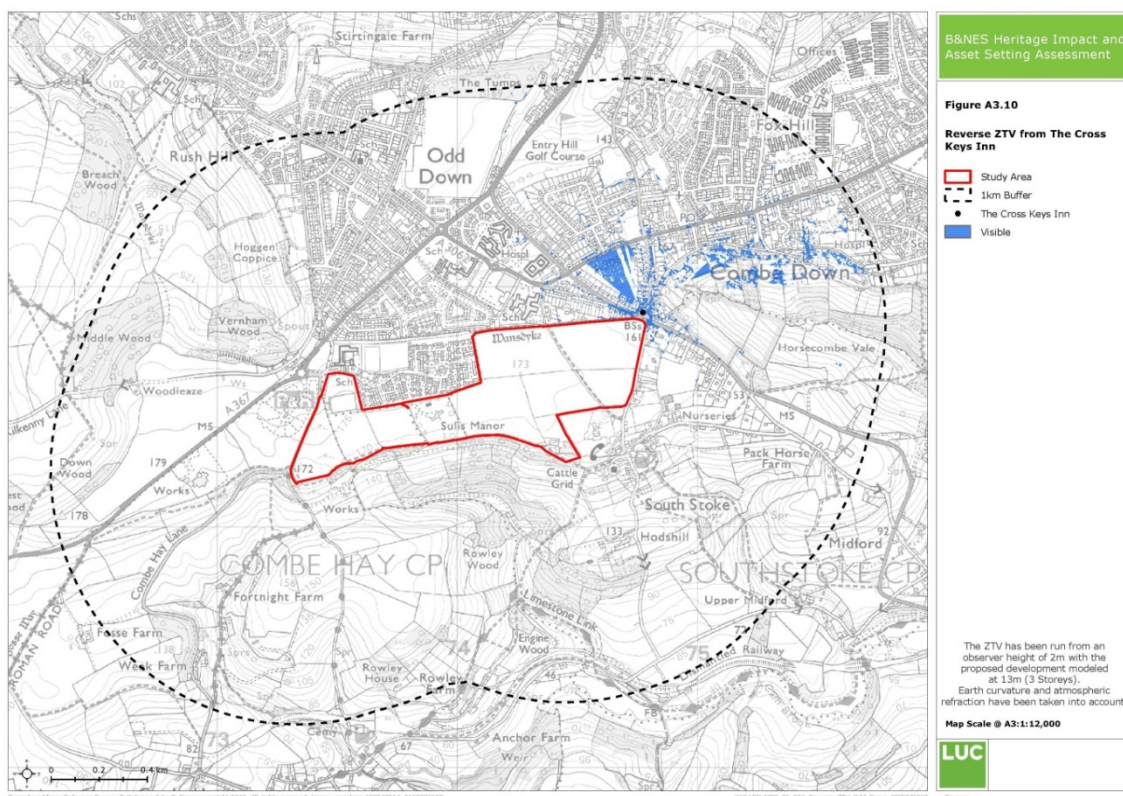


Figure A3.10: Reverse ZTV from The Cross Keys Inn

Conservation Areas

- 3.82 The setting of **South Stoke Conservation Area** as small hillside settlement overlooking the Cam valley will not be affected by the development at Odd Down (See ZTVs in **Figures A3.8 and A3.9**). Development of the site therefore presents an overall **low risk to the significance of the Conservation Area**.
- 3.83 The setting of **Bath Conservation Area** will not be affected by development providing it does not break the skyline in views looking south. (See ZTVs in **Figures A3.8 and A3.9**)

Registered Parks and Gardens

- 3.84 There are no Registered Parks and Gardens within 1km of the site.
- 3.85 There would be a **low risk to the heritage significance** of the locally designated park and garden at Midford Castle which is at some distance from the site.
- 3.86 Developing the fields either side of Sulis Manor gardens would result in a **low risk to the heritage significance of the Manor garden** due to the enclosure to the garden afforded by the tree cover. Developing the garden itself would result in a **medium risk to the heritage significance**.

World Heritage Site

- 3.87 B&NES Council carried out an LVIA study in relation to the World Heritage Site. This concludes that the significance of the impact on the WHS will vary between the various fields within the site as follows:
- Development on the **sports field and Field East 1** will have an impact of **low negative significance on the WHS**.
 - Development on fields **West 1 north and East 4 north** will have an impact of **medium negative significance on the WHS**.

- Development on fields **West 2, West 1 south, East 4 south, East 3 and East 2** will have an impact of high negative significance on the WHS.

3.88 There are some parts of fields not considered in the WHS LVIA study, potentially because these areas have been planted with shelter belt trees. These are the most southern parts of West 1 south, East 4 south, East 3 and the eastern edge of East 2. The shelter belts provide an important screen to the site in views from the south and potential views from the South Stoke Conservation Area.

Combined Sensitivity and Risk Summary

- 3.89 Areas of the Odd Down site would propose a risk to the significance of heritage assets if developed, largely as a result of its proximity to the Wansdyke Scheduled Monument. The following table summarises sensitivity and risk in relation to the site. It should be read in conjunction with the **Odd Down Summary Map, Figure A3.11**.
- 3.90 Risks in relation to undiscovered archaeology have not been mapped and it is recommended that suitable survey work is carried out prior to any development works.
- 3.91 Information in relation to the World Heritage Site is taken from the B&NES LVIA work and this should be referred to for further detail for these fields. There are some parts of fields not considered in the WHS LVIA study, potentially because these areas have been planted with shelter belt trees and there are existing agricultural buildings. **These are the most southern parts of West 1 south, East 4 south, East 3 and the eastern edge of East 2.** The shelter belts provide an important screen to the site in views from the south and potential views from the South Stoke Conservation Area. Sulis Manor was not included within the B&NES LVIA summary map although the report did discuss development within this area.

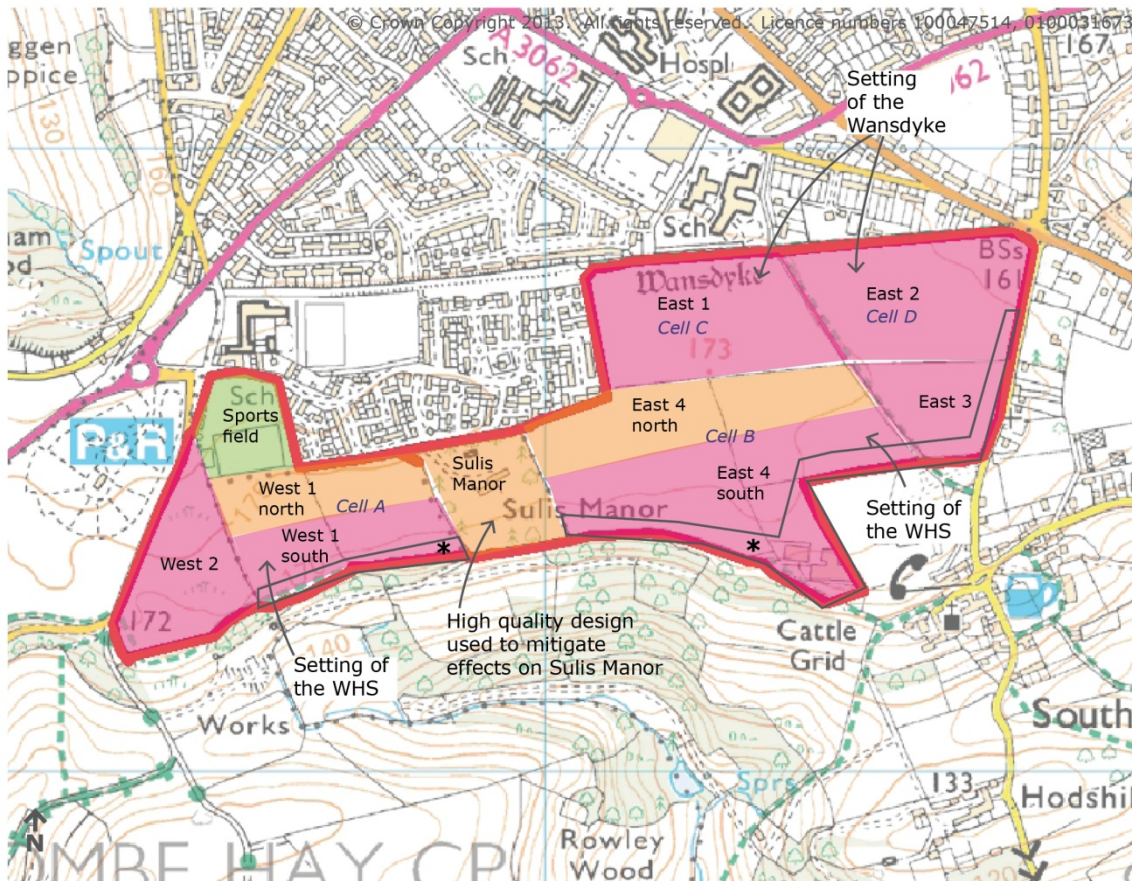
Table A3.6: Odd Down, Summary Table of Risk to the Significance of the Heritage Asset

Field	Arch.	Historic B'dings	CA	RPG	WHS	Overall judgement of risk
Sports field					Low	Low
West 1 north					Medium	Medium due to the effect on the WHS
West 1 south					High	High due to the effect on the WHS
West 2					High	High due to the effect on the WHS
Sulis Manor		Sulis Manor and garden			Medium	Medium due to the effect on the WHS
East 1	Setting of the Wansdyke				Low to Medium	High due to the effect on the setting of the Wansdyke, although
East 2	Setting of the Wansdyke	Cross Keys Public House			High	High due to the effect on the WHS
East 3	Setting of the Wansdyke		South Stoke Conservation Area.		High	High due to the effect on the WHS
East 4 north	Setting of the Wansdyke		South Stoke Conservation Area.		Medium	Medium due to the effect on the WHS
East 4 south	Setting of the Wansdyke		South Stoke Conservation Area.		High	High due to the effect on the WHS

3.92 In summary, development at the Odd Down site will be:

- **low risk** to the significance of known heritage assets within the sports field
- **medium risk** within West 1 north, Sulis Manor and East 4 north
- **high risk** within the remaining fields.

3.93 Development on the site is however considered to present a **medium risk** in relation to unknown archaeological assets and therefore appropriate mitigation would be required (as outlined below).



Odd Down Summary Map



* Approximate area not included in B&NES LVIA study

Labels Cell A - Cell D refer to other B&NES studies, and do not accord with the site boundaries of this report. They are included on the map figure to allow cross reference.

Risk relating to undiscovered archaeology has not been mapped. It is recommended that a detailed survey be carried out prior to development.

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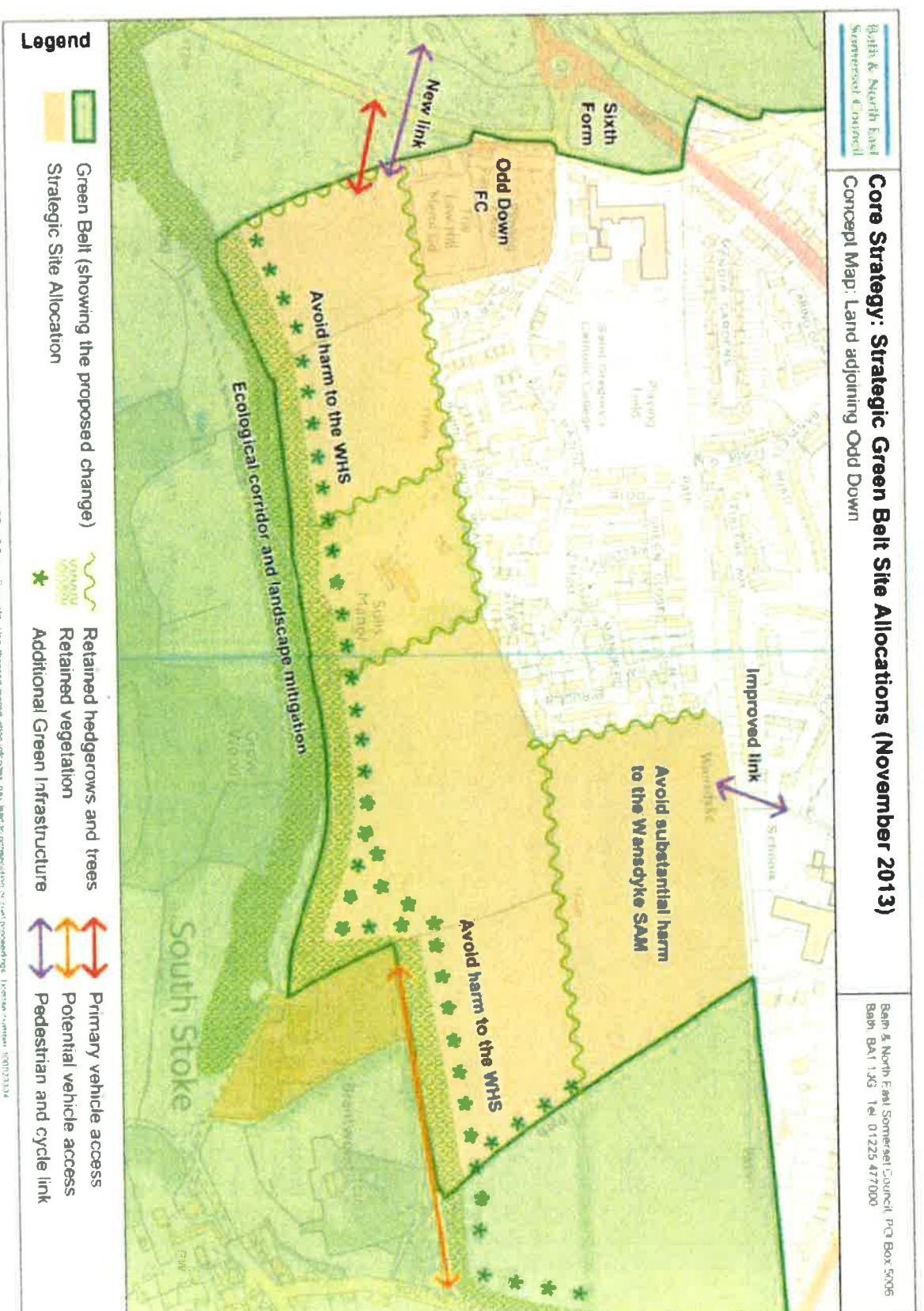
Figure A3.11, Odd Down Summary Map

Mitigation and Enhancement

- 3.94 Please note that mitigation and enhancement measures are only provided in relation to areas which have been identified as low or medium risk. As outlined in the NPPF and Table 2.2 of this report, development in areas of high risk should be exceptional or wholly exception and therefore avoided as there is a risk that development could cause substantial harm to the designated heritage assets, or non-designated heritage assets of demonstrably equivalent significance, and/or their settings.
- 3.95 If areas of low to moderate risk are allocated for development, it is important that opportunities are taken to avoid or minimise impacts on heritage assets and their settings. These include the following:
- Reduce risks to developing Sulis Manor and garden by sensitive design of very low density, retaining the framework of trees on site.
 - Reduce risks to the South Conservation Area by limiting the height of the development.
 - Utilise tree planting as a framework throughout the proposed development, with sufficient set back to allow growth of trees which will eventually break up the rooflines of development.
 - Limit lighting column heights to that of the development to minimise vertical features within the view from the Wansdyke.
- 3.96 There is a risk to presently-unknown archaeological remains within the study site. It would be necessary to carry out an archaeological evaluation to establish whether such remains are present, and identify their date, nature and significance before a decision could be made on whether mitigation measures of the type described in Appendix 7 are appropriate.

Appendix EDP 2
Plan included as Annex 1 to the B&NES Schedule of Core Strategy
Amendments (November 2013)

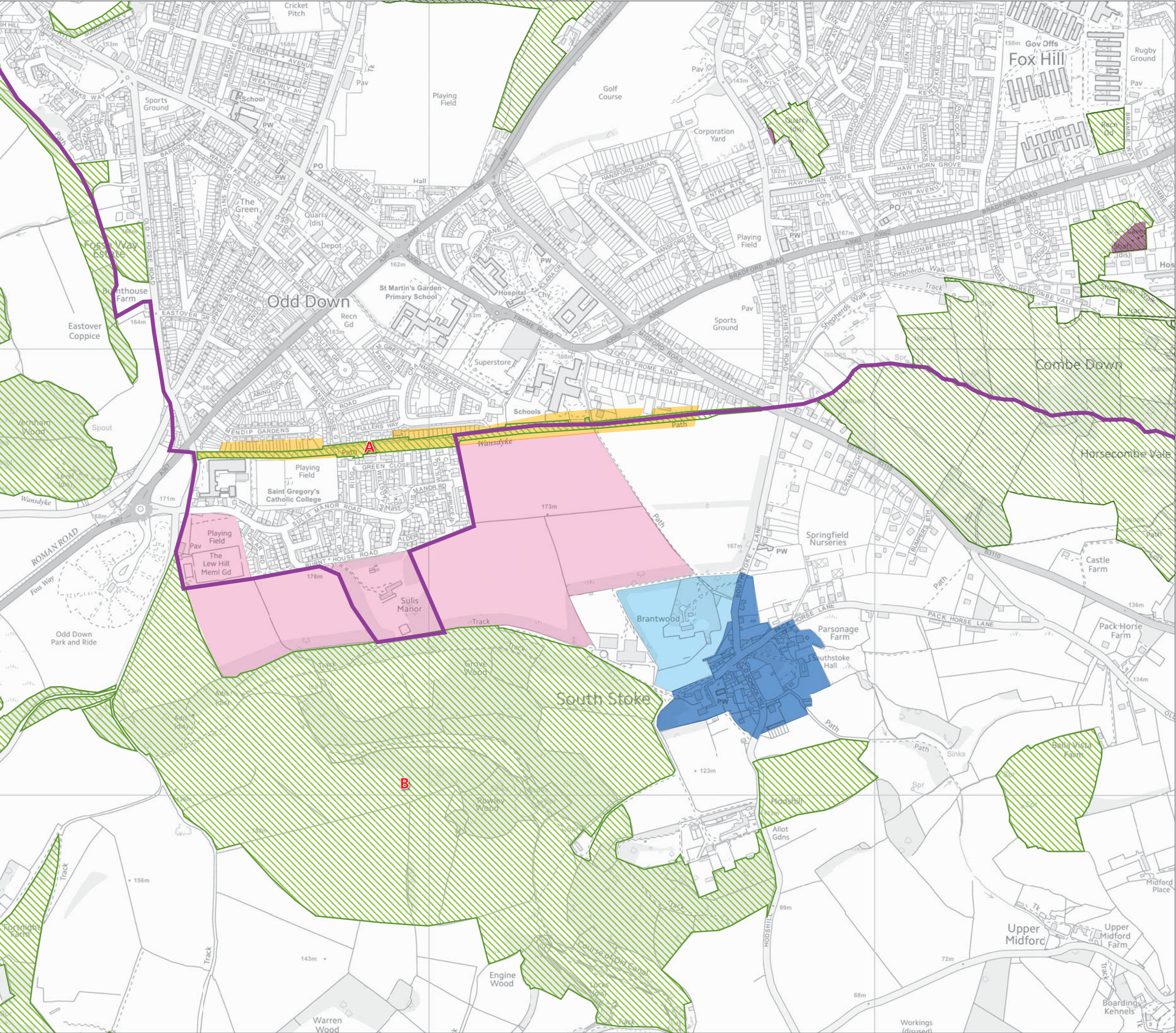
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Plan

Plan EDP 1 Bath and North East Somerset Council Consultation on the Core
Strategy Green Belt Amendments
(EDP2225/01 16 December 2013 GC/AC)

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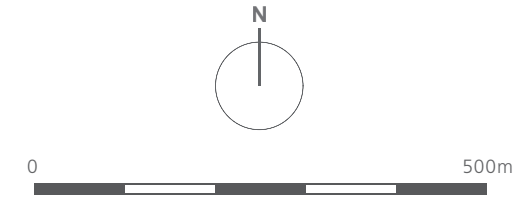
Extent of Land Covered by Policy CSA22

Heritage Designations

- City of Bath World Heritage Site Boundary
- Wansdyke Scheduled Monument
- South Stoke Conservation Area (Adopted)
- South Stoke Conservation Area (Proposed Boundary Extension)

Ecology Designations

- Bath and Bradford-on-Avon Bats SAC (& Combe Down and Bathampton Down Mines SSSI)
- SNCI
 - A - Wansdyke Footpath SNCI
 - B - Fuller's Earth Works - South Stoke Complex SNCI



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client
South Stoke Parish Council

project title
**Bath and North East Somerset Council
Consultation on the Core Strategy
Green Belt Amendments**

drawing title
**Plan EDP 1: Environmental
Designations**

date	16 DECEMBER 2013	drawn by	GC
drawing number	EDP 2225/01	checked	AC
scale	NTS		



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