



Response to Welbeck Consultation on New Sulis Down Proposals

26th January 2026

Report agreed by SOBA Management Committee on 26th January 2026

1. Executive Summary

The revised proposals submitted by Welbeck Land to develop Phases 3 and 4 of Sulis Down do not adequately address the reasons why the previous application was refused by both B&NES Planning Committee and the Planning Inspector. The total quantum of development, when taken with what has been and is likely to be built within the allocation, brings the total to 416 – 441 dwellings. This is far outside the parameters set within Policy B3a of ‘around 300’, a number that has not changed in either the Local Plan Partial Update or the Options Document for the next B&NES Local Plan.

The southern extent of the built development differs little from the previously rejected application, and the building height of up to 2.5 storeys is the same as Phase 1 which the Inspector described as ‘*very conspicuous on the skyline*’. These proposals would still result in unacceptable harm to the Cotswolds National Landscape and the setting of the Bath World Heritage Site.

Other issues with the current proposals include:

- The **Comprehensive Masterplan** is still not comprehensive as it gives no indication of any housing around Sulis Manor or Odd Down Football Club.
- The **Allotments** need to have the capacity for the entire allocation and should be placed more centrally within the development.
- The **Eastern boundary** should be planted with trees to screen the development.
- The **impact of the spine road on the trees surrounding Sulis Manor** has not been shown in the proposals and the impact on the views needs to be assessed.
- The **path to the north** should not cut across the centre of Great Broad Close but run along the western edge to reduce the landscape impact on the Wansdyke.
- **Contributions towards education and health** are promised in the current proposals, whereas previously the developers argued that they were not obliged to make any contribution towards the increased costs of education or the hospital.
- Phase 1 did not deliver the mix of **affordable housing** required by B&NES and this shortfall needs to be rebalanced in the current application.
- The **assessment of traffic impact** must include measurement of actual queue lengths, the models must allow for the interaction between junctions and all CCTV survey data must be openly available.

Phase 1 has failed to deliver much of what was promised and the current consultation is inadequate and does not address the fundamental reasons why the previous application was rejected.

Therefore, the current proposals must be significantly scaled back and revised before they are submitted to B&NES.

2. Introduction

The South of Bath Alliance has serious concerns about the current proposals to build 'around 200' more houses on the South Stoke plateau. This is based on the [information released on 13th January by Welbeck Land](#) as part of the consultation event in Odd Down, the previous application to build 171 houses as part of Phase 1 of Sulis Down, and the unsuccessful application to build 290 further houses.

While there are some marginal improvements to these proposals compared with the previous ones, they still represent a major over development of the South Stoke plateau and they continue to be significantly outside the parameters for this allocation within Policy B3a of the B&NES Local Plan.

Before responding to the new proposals, it needs to be recognised that there is a significant mismatch between what was promised for Phase 1 and what has, and has not, actually been delivered.

3. Mismatch between Phase 1 promises and Phase 1 delivery.

The [Phase 1 Design and Access Statement](#) described the Phase 1 architecture as follows:

Sitting within a rural-urban interface (both within the setting of the Bath World Heritage Site and within the Cotswold AONB), we developed a language that draws inspiration from the Cotswold Arts & Crafts vernacular; with use of repetitive architectural motifs and details handled in a richly varied way: casement windows, projecting bays, gables and prominent chimneys.

Pictures of how this would look were included. However, what was promised and what was delivered have been very different, for example as illustrated by the images below.



Houses on Derryman's Green from the Phase 1 Design and Access statement (left) and as they appear in January 2026 (right).

The Inspector noted in his [Appeal Decision](#) when considering the long-distance views from the south of Phase 1 the presence of '*prominent red tile roofs*'. This roofing is very different from the roofing described in the [Phase 1 Design and Access statement](#). This promised: '*Relatively steeply pitched roofs, in a Cotswold stone tile material; this finish is dark and recessive, reducing longer-distance visual impact.*'

There are also many issues with the infrastructure and landscaping that has been delivered. Problems with sewer blockages and low water pressure have still not been resolved, and there are missing street lights that have yet to be installed. The replanting of the southern woodland belt is still not to a standard that it can be handed over to the management company and many of the trees that have been planted within the development have died. Derryman's Green, which is proposed to provide a centre piece for Phase 1, consists of an area of stoney ground with rough grass and dying trees. One of the two play areas is not properly fenced.

Sulis Down residents have been working hard to try and get the builder, Vistry, to resolve the many problems that there are with the site. The development is still not in a state that it can be handed over to the Land Management Company.

Similar promises and reassurances are now being made in the current proposal to those that were made for Phase 1. These promises therefore can be given little weight in light of the evidence of what has, and has not, actually been delivered in Phase 1.

4. Issues with the proposals for Phases 3 & 4 published on 13th January 2026.

4.1 Scale of the development

[Policy B3a](#) states that the allocation on the South Stoke plateau is for 'around 300' dwellings for the entire site. 171 have been built in Phase 1 and [B&NES's latest housing trajectory](#) has 129 houses remaining to be built. This number has not changed within either the Local Plan Partial Update or the current [Options Document for the next Local Plan](#).

The proposal also makes no reference to the very high likelihood that other parts of the allocation will be developed and will add to the housing numbers. Odd Down Football Club want to develop part of their land for maybe 20 houses and Sulis Manor is likely to result in 25 – 50 further houses.

As a result, the 'around 200' houses proposed here would bring the total for the development to 416 to 441 houses. This is 38% to 47% above the allocation for this site. The 'around 200' dwellings need to be significantly reduced in any application for outline planning permission. Also, the outline proposals need to specify 'up to' a number of dwellings as the use of 'around' is imprecise and inevitably results in more not less.

4.2 There is still no Comprehensive Masterplan

The lack of clarity over housing numbers is a direct result of there still being no agreed Comprehensive Masterplan, eight and a half years after the Local Plan was adopted. The many iterations of the masterplan submitted with the previous application only covered what was within the outline proposal, and not any of the other elements of the allocation: Sulis Manor, Odd Down Football Club and Sulis Down Business Village. Without a truly Comprehensive Masterplan claims to '*Create a landscape-led neighbourhood*' and that '*The refreshed proposals for Phases 3 and 4 sit within this wider vision...*' are meaningless. For example, Sulis Manor is at the heart of the Sulis Down development both in its location and the design approach that has been taken with the new houses, yet we are none the wiser as to what the plans for Sulis Manor are. It has the potential to make an excellent community hub for all the phases of the development and the surrounding area. There is no evidence that Sulis Manor will be incorporated in a cohesive way with the rest of the development.

The [approval of phase 1](#) without a Comprehensive Masterplan has been shown to be a major error. Issues relating to, for example, allotments and the mix of affordable housing have been put off to later stages without any agreed plan.

No further outline or full development proposals should be submitted for this allocation until Placemaking Principle 2 of Policy B3a is fulfilled and a Comprehensive Masterplan, through a genuine public consultation process, is agreed by B&NES Council.

4.3 Allotments

The failure to agree the location of the allotments at an early stage of the planning process has resulted in a colossal waste of time for all parties and still left the residents of Phase 1 with no allotments long after they should have been delivered under the Section 106 agreement.

The total area for the allotments in the current proposals is not clear. They need to have the capacity for all the phases of the development. For ease of access for all the Sulis Down residents they should be centrally located and not at the far eastern end of the allocation which is over 1 km away from some Phase 1 residents. The eastern extent of the allocation also should have a buffer of trees to provide a visual screen to the development. This makes it an unsuitable location for the allotments as they do not want to be within a shaded area.

After a number of false starts in application [22/02169/EOUT](#), a suitable location for the allotments was agreed with B&NES Parks Departments in the north western corner of Phase 3. This would have the capacity for the entire allocation and is a much more sensible location. It is a central to the overall development and has the added benefit that it will provide a buffer between the new development and the residents of Sulis Meadows.

4.4 Eastern boundary

There needs to be planting along the eastern boundary of the development as indicated within [Policy B3a Placemaking Principle 5](#) which states that '*appropriate Eastern boundary treatment should be established as part of the Masterplan*'. This would mitigate the visual impact of the development when viewed from the east.

4.5 The southern extent of the built development.

When the application from Phase 1 was being assessed in 2018, [B&NES Landscape Officer objected](#) to the proposal '*primarily because of the unacceptable harm it would cause to the Outstanding Universal Value of the City of Bath World Heritage Site and in particular the attribute of the 'The Green Setting of the City in a Hollow in the Hills' and because of the unacceptable harm to the Cotswolds Area of Outstanding Natural Beauty.*'

Unfortunately, these views were not heeded.

Much is made in the current proposal about the reduction in the height of the proposed buildings from 3 storeys to 2 – 2.5 storeys. It should be noted that there are no 3-storey building in Phase 1. The building proposed in the current proposal therefore, will be the same height as in Phase 1.

The landscape impact of Phase 1 on the views from the Cotswolds National Landscape was an important factor in the Planning Inspector's [dismissal of the appeal](#) against the refusal of planning permission for application 22/02169/EOUT. He stated that '*housing at Phase 1 is very conspicuous on the skyline*'.

With the proposals for phase 3 and 4 he concluded '*despite the various mitigation and enhancement measures, the overall adverse effects of the proposed development on the CNL would still be significant. It would not avoid a detrimental impact on the CNL.*'

Despite these conclusions, and the statement that '*our approach is landscape led*' and that '*landscape and heritage are of central importance*', the proposals appear to take very little account of the Inspector's conclusions. The southern extent of the development has altered very little when

compared to the previous application (see the two Comprehensive Masterplans below). The number of the houses needs to be significantly reduced by reducing how far south the development extends if the reasons that the Inspector rejected the application are to be addressed.



Left: Phases 3 and 4 from the [Comprehensive Masterplan in 2023 \(version H\)](#)
 Right: Phases 3 and 4 from the [Comprehensive Masterplan in 2026](#).

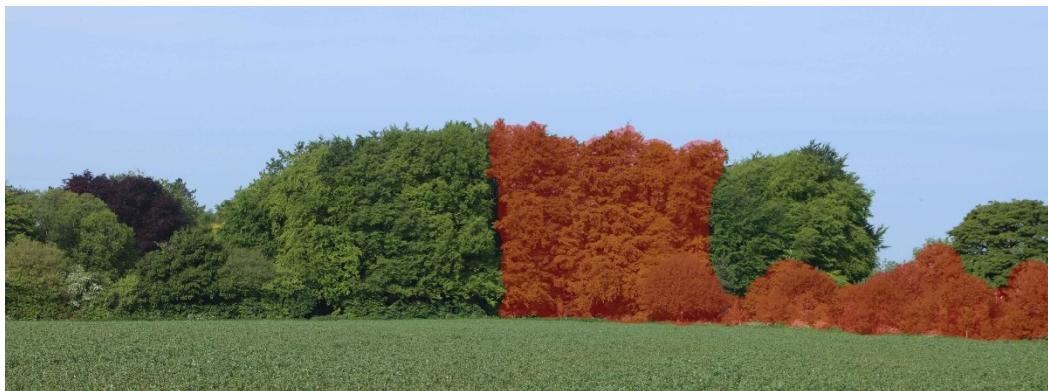
4.6 The Impact of the Spine Road on the Trees Surrounding Sulis Manor.

The watercolour view of the proposed development completely overlooks the tree loss as a result of the spine road across Sulis Manor, as does the Landscape and Biodiversity diagram.



Left: detail from [2026 proposals](#) showing no apparent tree loss or spine road.
 Right: detail from [landscape and biodiversity plan](#) omitting the loss of trees resulting from the route of the spine road across Sulis Manor.

All the trees surrounding Sulis Manor are protected by a Tree Preservation Order ([TPO number 500/306](#)). Based on the tree losses from the previous [Arboricultural Impact Assessment](#), 69 trees and 4 tree groups would be cut down if permission were granted for a Spine Road across Sulis Manor grounds. These four tree groups consist of 60 trees, bringing the number of trees to be removed within Sulis Manor grounds to 129.



View of Sulis Manor grounds from the east showing the trees proposed to be removed (red wash) in the [Arboricultural Impact Assessment](#) for application 22/02169/EOUT.

The 'Green infrastructure influences plan' of the proposal also significantly overstates the extent of the 'plateau woodland edge'.

These new proposals state '*Landscape and views are being carefully assessed and used to shape and refine the design as it develops*'. In the previous application the visual impact of the loss of the trees around Sulis Manor was never shown. Instead, before and after cross sections were presented from a narrow strip within Sulis Manor grounds where there are relatively few trees identified as to be felled. None of the Landscape Sections provided show the visual impact of the tree losses from the eastern or western boundaries where the tree losses are greatest and would be most widely visible (see [SOBA Objection Second Update](#) section 5.2). These must be provided in the next application if the impact on '*landscape and views*' are to be properly assessed.

4.7 The Path to the North

The path from the development to the north where there will be a crossing of the Wansdyke goes across the middle of Great Broad Close. The landscape impact of the path on the Wansdyke would be lessened if the path followed the western boundary of the field. A path across the centre of this field would also make the field far more difficult to cultivate.

4.8 Contributions towards education and health

We note that a key feature of these proposals is '*Contributions through planning obligations to support local transport, education, health and community infrastructure*'. We are sceptical that this commitment will ever be delivered. With the previous unsuccessful application [B&NES Education Services](#) asked for £1,026,798 to cover 57 additional secondary school places. The [Royal United Hospital](#) asked for £276,843 to mitigate the direct impact of the additional residents on the services they provide. In both cases consultants were employed to argue that the developers were not obliged to make any contribution and no payment towards education or hospital costs were proposed. Therefore, the proposed contributions must be defined in any application arising from these proposals.

4.9 Affordable housing

The presence of 40% affordable housing proposed is a positive. We have previously highlighted that Phase 1 did not deliver the **mix** of affordable housing that B&NES requested. [B&NES Housing Officer](#) only approved Phase 1 on the condition:

- *That all subsequent phases will deliver an affordable housing contribution that proportionally rebalances the agreed affordable unit split (table one) across the whole masterplan site.*
- *Should phase one be agreed, this will necessitate an increase delivery of affordable house units against a reduction of affordable flats on the subsequent phase.*

Details of how this will be achieved need to be included in the outline planning application for Phases 3 and 4.

4.10 Assessment of the traffic impact

One of the major issues that the local community had with the previous application was the current highly congested road network and the impact that the additional traffic from the development would have. This was compounded by the modelling data presented for current traffic flows, which showed no issues and did not represent individuals' daily experience of driving in the area at peak times.

The [Options Document for the next B&NES Local Plan](#) proposes around 6,000 more houses in the Somer valley which will increase the pressure on the A367 route into Bath. The [B&NES Transport Methodology](#) for the new Local Plan identifies the need for microsimulation modelling and mitigation of the impact of proposed new developments using VISSIM. This also needs to be used for this application.

It is therefore necessary that:

- The baseline collection of existing traffic flows must also include measurement of actual queue lengths.
- The model used must allow for interaction between junctions, for example VISSIM.
- The CCTV data of traffic flow and queue lengths collected must be openly available.

4.11 The Current Consultation

The level of public consultation, as with previous proposals, has been minimal. The invitations to the event on 13th January were received at best one week, and in some cases on the same day as the 'consultation event'. No invitations appear to have been sent to the residents of Combe Hay, despite Combe Hay Parish Council speaking at both the Planning Meetings for the previous application and being a Rule 6 party, together with South Stoke Parish Council, at the Planning Inquiry.

The plans themselves were only released on the day of the consultation giving minimal time for the community to study them before the only opportunity to question the developers about them. The consultation is only open for 2 weeks, much shorter than the usual 6 week standard.

Many of the [questions on the survey](#) seem to be designed to elicit a positive response for features of the development that are existing obligations (e.g. allotments, cycle paths, footpaths) and there is only one question about the development as a whole with two comment boxes. It is difficult to see how this consultation will be used to '*shape the plans*'.

The most contentious issue with this and the previous application is the scale of the development yet there are no questions relating to this. Alternate scales of development have not been presented with these proposals or the previous proposals, despite a request for them from B&NES for them prior to the last application. The Planning Inspector also stated in his [Appeal Decision](#) that '*it would have been very helpful to see the potential effects of different scales, layouts, and amounts of housing*'.

The Facebook page for this consultation defaults to only displaying the ‘most relevant’ comment. This appears always to be a positive comment, despite the preponderance of critical comments.

In the consultation document it is stated that these are ‘Update proposals based on your input’. In our view the significant issues that have been previously and strongly expressed by the community have not been accommodated. It is also the case that, as with previous consultations, little was shared in detail with the community nor *‘lessons learned from earlier applications’*.

All the consultation data, suitably anonymised, must be shared publicly.

5. Conclusion

The proposals presented continue to represent a significant overdevelopment of the plateau. The reasons that the previous application was rejected, both by the B&NES Planning Committee and the Planning Inspector have not been adequately addressed, and are not part of this consultation, making the exercise feel more like window dressing rather than a serious attempt to engage with the local community.

Further details about the South of Bath Alliance can be found at: www.soba.org.uk