

Sulis Down

Design & Access Statement

March 2026



WELBECK LAND

BMD

Ben Pentreath

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ONE

Introduction

Introduction

This Design and Access statement has been prepared on behalf of Welbeck Land Ltd (the Applicants) to update the Comprehensive Masterplan and to address the next phase of residential development at Sulis Down, Bath. This outline planning application submission is for a hybrid planning application comprising:

(i) Outline application for Phases 3 and 4 for up to 200 dwellings; landscaping; community hall; drainage; allotments; open space; footpaths and emergency access; all matters reserved, except access from Coombe Hay Lane via the approved phase 1 spine road (details of internal roads and footpaths reserved);

(ii) Detailed application for the continuation of the spine road (from Phase 1), to and through Sulis Manor and associated works comprising: the demolition of existing dilapidated buildings and tree removal; drainage; landscaping; lighting; and boundary treatment; to enable construction of the spine road.

It should be read in conjunction with the other documentation submitted as part of the outline planning application submission. The purpose of this statement is to describe the evolving design process and key design principles which have informed the Comprehensive Masterplan and latest Phase of development.



Proposed Phases 3&4 aerial view

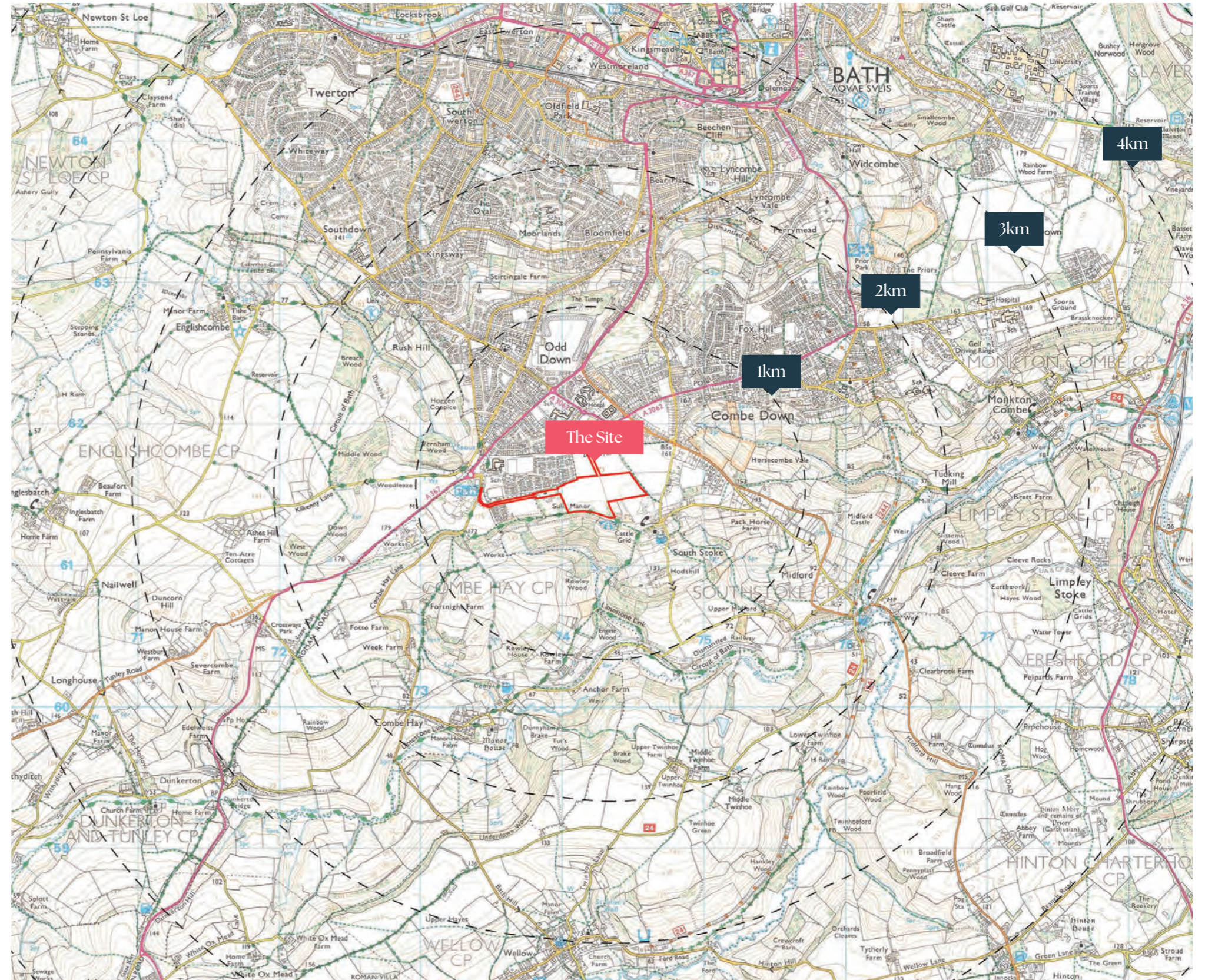
Introduction

WIDER LOCATION PLAN

The Site is located within the district of Bath and North East Somerset, in the south west of England. The Site, part of Sulis Down, is located on a plateau, circa 2.5km south of the city of Bath, with nearby settlements of Sulis Meadows and South Stoke.

The Site sits within the Cotswolds National Landscape, with the majority of the designated landscape running around the south and east of the Site. The Site also sits on the edge of the City of Bath World Heritage Site, with the rest of the designation running north towards the city centre.

Local facilities within a 1km radius include a large supermarket, doctors surgery, St Gregory's Secondary School and Sixth Form, St Martin's Garden Primary School and transport facilities such as bus stops and Odd Down Park & Ride, providing travel to the centre of Bath and the surrounding areas.



— Site Boundary

Introduction

SITE LOCATION PLAN

The Bath and North East Somerset (B&NES) Core Strategy was adopted in July 2014.

In order to address a range of urgent issues in B&NES, including climate and ecological emergency declarations, the Council prepared a partial update of the Core Strategy and Placemaking Plan (2017) which together comprise the Local Plan. The Local Plan Partial Update (LPPU) adopted in 2023 is set out as a schedule of changes to the Core Strategy and Placemaking Plan. These combined documents set the development context for B&NES over the period 2011 – 2029.

‘Land adjoining Odd Down, Bath’ is identified in the Core Strategy and LLPU as a Strategic Site Allocation to meet part of this housing need. It is allocated for a residential led mixed-use development under **Policy B3a**. The allocation is supported by a range of ‘Placemaking Principles’, which are to inform development proposals across the allocation area.

In 2018 the proposed **Phase 1** planning application ‘to provide 171 residential units, open space, green infrastructure, landscaping and associated works including provision of vehicular access from Combe Hay Lane’ was approved by Bath & North East Somerset Council. This phase is now largely complete.

A later hybrid application for up to 290 dwellings on **Phases 3 & 4**, east of Sulis Manor, was refused and the appeal dismissed in March 2025.

This hybrid application for up to 200 dwellings will include a detailed application for the continuation of the Spine Road from Phase 1 through Sulis Manor, alongside areas for ecological mitigation.



- Phases 3 & 4 - Application Boundary
- Phase 2 - Sulis Manor Boundary
- Phase 1 - Boundary

Planning History

Land at Odd Down, Bath was originally allocated in **The Bath and North East Somerset (B&NES) Core Strategy**, adopted July 2014, as part of **Policy B3a** for around 300 dwellings to 2029.

The allocation remains within the current combined **Local Plan Partial Update (LPPU)**, which references both the Core Strategy adopted in 2014 and the Placemaking Plan adopted in 2017. The LPPU was adopted in January 2023.

Phase 1 (171 homes, 40% affordable) is now largely complete. A later application for up to 290 dwellings on **Phases 3 & 4**, east of Sulis Manor, was refused and the appeal dismissed in March 2025.

APPEAL DECISION

The Inspector underlined that great weight must be given to *‘conserving and enhancing landscape and scenic beauty’* in **National Landscapes, National Planning Policy Framework** (NPPF) para 189, and that *‘major development should only be allowed in exceptional circumstances and where in the public interest’* (NPPF para 190). **Policy B3a** requires *‘protection and enhancement of landscape features, with impacts on the Cotswolds National Landscape (CNL) avoided or minimised’*.

The Inspector found that the proposals failed this test: despite mitigation planting, *“the roofs of housing would be clearly visible,”* breaking the skyline and harming long-distance views.

The Inspector found conflict with **Policy B3a, Placemaking Plan Policy NE2**, and the **NPPF**. Importantly, he noted that harm could have been reduced *“through exploration and assessment of different heights and quantum,”* but this had not been undertaken. He concluded: *“There would be detrimental effects on the environment and the landscape... and exceptional circumstances for major development in the CNL have not been demonstrated”*.

The Inspector wasn’t critical of the Detailed Planning Application drawings submitted as part of the Phase 2 Sulis Manor spine road.

FRESH APPLICATION

Welbeck Land and the Hignett Family Trust are preparing a new application for **Phases 3 & 4**. Bradley Murphy Design (BMD) has been appointed to help shape revised proposals.

BMD have adopted **a landscape-led approach**: reassessed the baseline, that informed the iterative masterplanning with Ben Pentreath, and prepared a robust LVIA. The aim being to produce a masterplan that minimises impact on the Cotswold National Landscape (CNL) while positively contributing to its character and enjoyment, in line with both local and national policy.

INSPECTOR’S COMMENTS - KEY POINTS:

1. Maintain visual separation from South Stoke and protect rural plateau character.
2. Strengthen and extend woodland belts to screen built form and enhance biodiversity.
3. Avoid intrusive massing at sensitive edges; keep heights low.
4. Protect and frame key views from PRowS, Wansdyke, and WHS setting.
5. Safeguard Sulis Manor’s setting with generous green buffers.

Climate Change & Sustainability

Sulis Down will meet the sustainability targets as set out in the 'Bath and North East Somerset Local Plan 2011–2029 Core Strategy & Placemaking Plan – District-wide Strategy and Policies'.

Objective 1 SCS Driver: Climate Change, sets out measures to pursue a low carbon and sustainable future in a changing climate. The table identifies these measures and how the Comprehensive Masterplan and Phases 3 & 4 will strive to adhere to them.

In 2020 Bath and North East Somerset declared a climate emergency. The council intends for B&NES to be carbon neutral by 2030 with three key priorities to achieve this;

Energy efficiency improvement of the majority of existing buildings (domestic and non-domestic) and zero carbon new build; A major shift to mass transport, walking and cycling to reduce transport emissions; A rapid and large-scale increase in local renewable energy generation.

In response to this, the Local Plan Partial Update was adopted in Jan 2023 introducing new sustainable construction policies for new build residential development and embodied carbon. Phases 3 & 4 will work to deliver these policies and the Outline Planning Application offers a high level assessment of the feasibility of delivery of new sustainable construction targets, on-site renewable energy and embodied carbon. A reserved matters application will address these matters.

Central to BaNES climate change objectives is the maximising of opportunities for mitigation, to maintain and enhance the natural environment. The key climate change policies contained within the Core Strategy have been updated through the Local Plan Partial Update (LPPU) in order to reflect the Council's Declaration of Climate and Ecological Emergencies and the commitment to securing net zero by 2030.

The LPPU was introduced in January 2023, and introduced

policies SCR6- 8 which are further reported within the Sustainable Construction Checklist Supplementary Planning Document. Furthermore, Policy CP2 of the Core Strategy and SCR1 of the Placemaking Plan has been replaced with new sustainable construction policies, relevant policies are:

Policy CP3 Renewable Energy sets district wide targets for electricity and heat generation from renewable energy

Policy CP4 District Heating states that combined district heat and power and district heating are considered, and identifies three areas as 'district heating priority areas' (Bath Central, Bath Riversides and Keynsham High Street) where development will be expected to incorporate infrastructure for district heating

Policy SCR2 Roof Mounted/Building Integrated Scale Solar PV: design policy that sets the design criteria when roof/building mounted photovoltaic panels are used

Policy SCR3 Ground Mounted Solar Arrays: impact policy that sets design and other criteria (e.g., ecology) when ground mounted solar panels are proposed

Policy SCR4 Community Renewable Energy Scheme

Policy SCR6 Sustainable Construction Policy for New Build Residential Development has been considered as part of the energy statement addendum, due to the policy requirements which include the following:

"New build residential development will aim to achieve zero operational emissions by reducing heat and power demand then supplying all energy through onsite renewables. Through the submission of an appropriate energy assessment, having regard to the Sustainable Construction Checklist SPD, proposed new residential development will demonstrate the following:

- Space heating demand less than 30 kWh/m²/annum
- Total energy use less than 40 kWh/m²/annum
- On site renewable energy generation to match the total energy use, with a preference for roof mounted solar PV
- Connection to a low- or zero-carbon district heating network where available
- Major residential development

In the case of major developments where the use of on-site renewables to match total energy consumption is demonstrated to not be technically feasible (for example with apartments) or economically viable, renewable energy generation should be maximised and the residual on site renewable energy generation (calculated as the equivalent carbon emissions) must be offset by a financial contribution paid into the Council's carbon offset fund where the legal tests set out in the Community Infrastructure Regulations are met.

Policy SCR8 Embodied Carbon relates to carbon emissions resulting from the materials, production, demolition and disposal. This states the following:

Large scale new-build developments (a minimum of 50 dwellings or a minimum of 5000m² of commercial floor space) are required to submit an Embodied Carbon Assessment having regard to the Sustainable Construction Checklist SPD that demonstrates a score of less than 900kgCO₂e/m² 900kg/sqm of carbon can be achieved within the development for the substructure, superstructure and finishes.

Climate Change & Sustainability

Policy SCR9 Electric vehicles charging infrastructure:

All dwellings with one or more dedicated parking space or garage must provide access to electric vehicle charging infrastructure. Further guidance will be set out in the Transport and Development Supplementary Planning Document

The Sustainable Construction Checklist SPD is a fundamental element of the district's climate change strategy. As required by Policy SCR 6, this checklist will underpin the applicant's approach to addressing climate change.

Achieving the Space Heating Threshold

Materials and design selected would aim to avoid thermal bridges and would include high-quality insulation and fenestration.

Mechanical ventilation heat recovery (MVHR) would be specified, as per above.

Other principles that will be followed to ensure the space heating requirements are met would be:

- Tight air barrier and thermal envelope – no draughts
- Low shape-form heat loss factor
- Low U-value glazing that compliments insulation, whilst ensuring appropriate glazing ratios and placement
- Maintain fresh air and ventilation
- Optimise orientation for shading to mitigate overheating

Achieving the Total Energy Use Threshold

The following considerations when installing on-site renewable energy to match the total energy use would be considered during the detailed design stages:

- Optimise orientation and maximise appropriate roof space i.e. large, south-facing unshaded surface area or east/west orientated homes, with both sides of the roof used for solar panels.
- Protect panels from wind damage, for example having a small parapet on flat roofs
- Where installations are not feasible, design roof space for easy installation in the future

The Proposed Development would aim for a renewable energy generation of 120kWh per m² of roof space.

The total energy use intensity meets the target of 40 kWh/m²/year for all dwellings. The space heating demand for all plots falls significantly under the target of 30 kWh/m²/year. This can be attributed to the highly efficient heating system, using air source heat pumps as the main method of space heating, in conjunction with a significantly improved fabric specification.

The scale of the proposed development, together with the absence of any existing Combined Heating and Power and District Heating System networks, rules out this approach to renewable energy provision. The detailed design and renewable energy provision will be agreed at future Reserved Matters stages.

Achieving the upfront embodied carbon threshold

During the detailed design stages, the RICS Professional Statement: Whole Life Carbon assessment for the built environment would be used as the methodology to calculate embodied carbon.

During the detailed design process, the design team would prioritise material efficiency as a first principle.

This includes optimising structural grids and spans, using materials only where necessary, and avoiding over specification of structural elements. Early structural reviews would evaluate opportunities for lean design, including reduced foundation sizes, rationalised wall thicknesses, and efficient framing systems.

Employing standard product dimensions and modular design can significantly reduce off cuts and manufacturing waste.

Structural engineers should assess alternative low carbon structural solutions, particularly timber or hybrid systems, where programme, cost, and fire safety constraints permit.

Materials with Environmental Product Declarations (EPDs) would be favoured where possible, to select products with demonstrably lower lifecycle impacts.

Priority would be given to responsibly sourced timber, recycled steel, low cement or cement replacement concrete mixes, and high recycled content insulation and finishes. Where concrete is required, the design team would specify mixes incorporating GGBS, PFA, or other supplementary cementitious materials to reduce Portland cement content.

Embodied carbon can be reduced through procurement strategies that favour local sourcing, shorter supply chains, and manufacturers with verified low carbon production processes. Construction methodologies could be selected with consideration for transport impacts, site waste generation, lifting requirements, and temporary works. Construction-phase carbon reporting would be integrated into contractor requirements to ensure transparency and continuous improvement.

Climate Change & Sustainability

Measures set out in Objective 1 SCS Driver: Climate Change and Local Plan Partial Update	Sulis Down Comprehensive Masterplan and Phases 3 & 4 Design Response
Reducing the need to travel by achieving closer alignment of homes, jobs, infrastructure and services.	<p>Sulis Down is within walking distance of St Martin's Garden Primary School, Sainsburys food store, doctors surgery and the other services and facilities within the Odd Down area.</p> <p>Connection to Bath City Centre is provided via the Park and Ride located adjacent to the site.</p>
Ensuring the location and layout of new development enables and encourages people to make the fullest possible use of public transport, walking and cycling.	<p>The proposals include the retention and enhancement of existing offsite pedestrian and cycle links together with new shared use and pedestrian links across Phases 3 & 4.</p> <p>The adjacent Park and Ride facility encourages use of public transport.</p>
Encouraging and supporting on site renewable energy generation to match the total energy use, with a preference for roof mounted solar PV	A updated sustainability strategy is included as part of the Phases 3 & 4 application. The provision of on-site renewable energy to match the total energy use is subject to high level design as part of the Phases 3 & 4 proposals. The quantum of onsite renewables will be confirmed as part of the detailed design work and reserved matters.
Promoting sustainable and energy efficient design and construction. The setting of a new threshold for space heating demand and energy use.	The design of the dwellings will be based on the 'fabric first' approach with improved U-values for heat loss elements; heat pumps; Mechanical Ventilation with Heat Recovery and wastewater heat recovery. A strategy for further reducing greenhouse gas emission through renewable energy sources is included as part of the outline application and will be further detailed at the Reserved Matters stage.
Shaping places so as to minimise vulnerability and provide resilience to impacts arising from climate change including increased flood risk.	A flood, drainage and SUDs strategy involving localised infiltration at source is included as part of the outline application, considering climate change impacts. Streets shall be designed to be lined with trees to provide shading and cooling.
Facilitating the prudent use and reduced consumption of key natural resources such as undeveloped land, energy, water and minerals.	A sustainability strategy is included as part of the outline application to include proposals for energy use, water usage and soil enrichment.
Maintaining and enhancing a network of connected and multifunctional green spaces for people and wildlife serving climate change adaptation and mitigation purposes.	The proposals for Phases 3 & 4 includes a green infrastructure strategy and an assessment to achieve a biodiversity net gain.

TWO

Consultation History

Planning Consultation History

Following the allocation of the site in the Core Strategy in 2014, a series of planning engagements have taken place with regard to the overall allocation, through preparation of a Comprehensive Masterplan.

Phase 1 Detailed Application 2016-2017

During 2016 and 2017 a detailed pre-application process was undertaken with BaNES Officers alongside statutory consultees. This involved a range of pre-application engagements, including meetings and site visits, which informed the Comprehensive Masterplan and the layout and detail of Phase 1.

During the determination of the Phase 1 planning application, further feedback was received on the Comprehensive Masterplan and this was revised and resubmitted, alongside amendments to the planning application. In 2018, the Council published their comments on the Comprehensive Masterplan, whilst recommending detailed approval for Phase 1. Following sealing of a Section 106 Agreement, planning permission was granted in 2019 for Phase 1.

Phase 3&4 Outline Application 2022-2023

Planning consultation process was undertaken for Phases 3 and 4 outline application (insert dates) to inform the initial submission. This included reviewing both the proposals for Phases 3 and 4 and an update to the Comprehensive Masterplan. Feedback was received which informed the planning submission. During the determination of the Phases 3 and 4 outline planning application further feedback was received and both the proposals for Phases 3 and 4 and the Comprehensive Masterplan were revised and resubmitted.

Design West Review Panel 2022

As part of the design process for the previous Phases 3 & 4 outline planning application, the Comprehensive Masterplan and Phases 3 and 4 proposals were reviewed by the Design West Review Panel. The Design Review Panel comprises a group of multi-disciplinary design professionals that provides impartial expert advice to applicants and local authorities on design issues.

The purpose of the design review of the Sulis Down proposals was to get a ‘second eye’ on the proposal to identify elements of the scheme that could be improved or be explained in a more meaningful manner. The design review took place over a day and consisted of a walk over the site, a presentation of the proposals by Project Team followed by a question-and-answer session with the panel. Feedback on the review was two-fold, verbal feedback on the day followed by a written response.



Plans presented as part of the Design West Review Panel

Public Consultation History

Phase 1 Detailed Application 2016-2017

A series of public engagement events were undertaken with regard to the allocation, the Comprehensive Masterplan and Phase 1. This included the following events:

- Public exhibition - November 2014
- Planning workshop - January 2015
- Public exhibition - November 2015
- Public Exhibition - November 2016

During the Phase 1 application period a consultation website was live – www.sulisdown.com – with information about the proposals. A freephone information line and email address was also available. Finally a newsletter was also sent to key local stakeholders.

Phases 3 & 4 - 2022

For the Phases 3 & 4 application an online Public Consultation event was held with the objective of gaining feedback from local residents on the features of the site and the proposed development that they felt were important to them. Around 5,000 leaflets were delivered to residents in the local area. To extend the reach of the consultation, a notice was placed in the Bath Chronicle. Other local groups/organisations such as the Bath Preservation Society and South Stoke Parish Council, along with Ward and other Councillors were also sent letters notifying them of the vent.

Both the Comprehensive Masterplan and proposals for Phases 3 & 4 were presented as part of the consultation.

A series of exhibition boards were made available on the Framptons Town Planning Ltd website. The exhibition boards explained the background and the details of the proposal. Through a series of 'topic' boards the sites constraints and opportunities were outlined, with information on potential approaches to reduce the impact of the development and enhance the local environment.

A feedback form, setting out a series of questions, was available for residents to complete on-line, or download and return to Frampton office, with a printable Freepost label.

The consultation event was held from the 11th February 2022 to 25th February 2022. Feedback from the consultation was reviewed by the Design Team and informed the design evolution of the scheme.



Banners and photo of the public exhibition held in November 2016

THREE

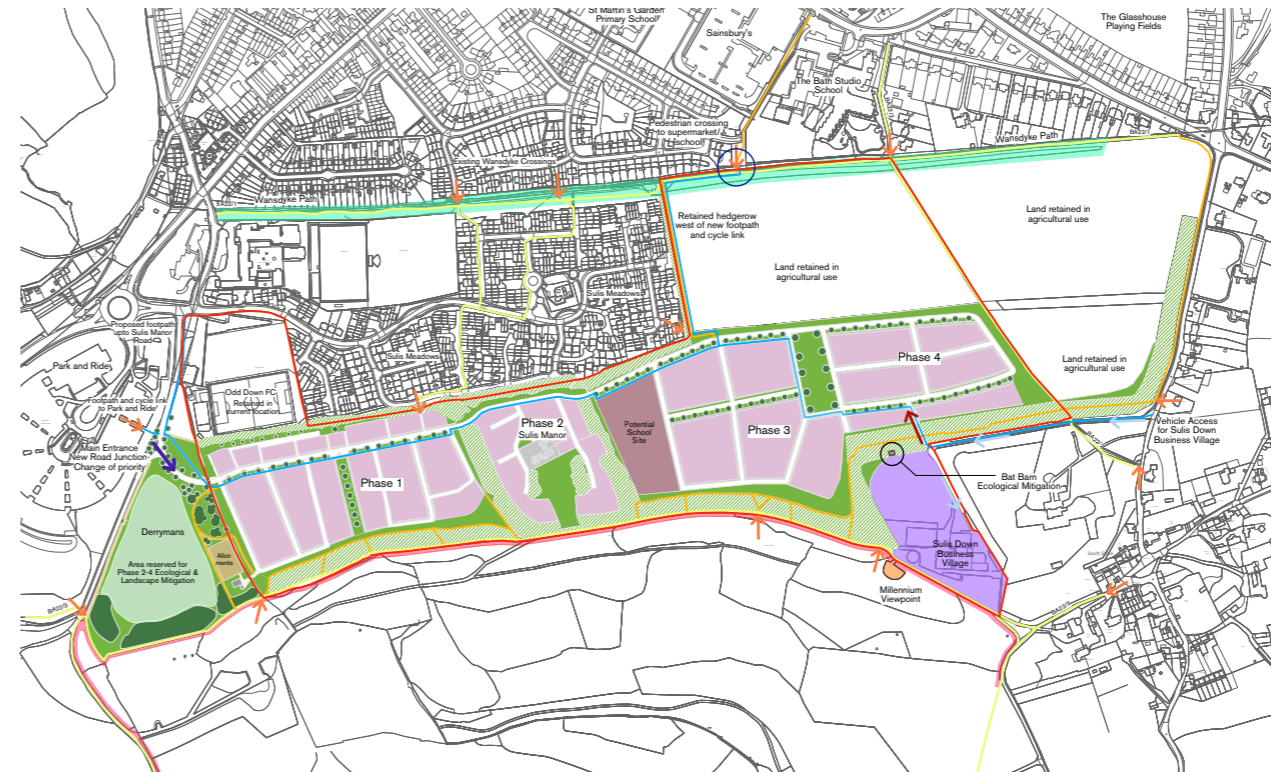
Comprehensive Masterplan

Aims & History of the Comprehensive Masterplan

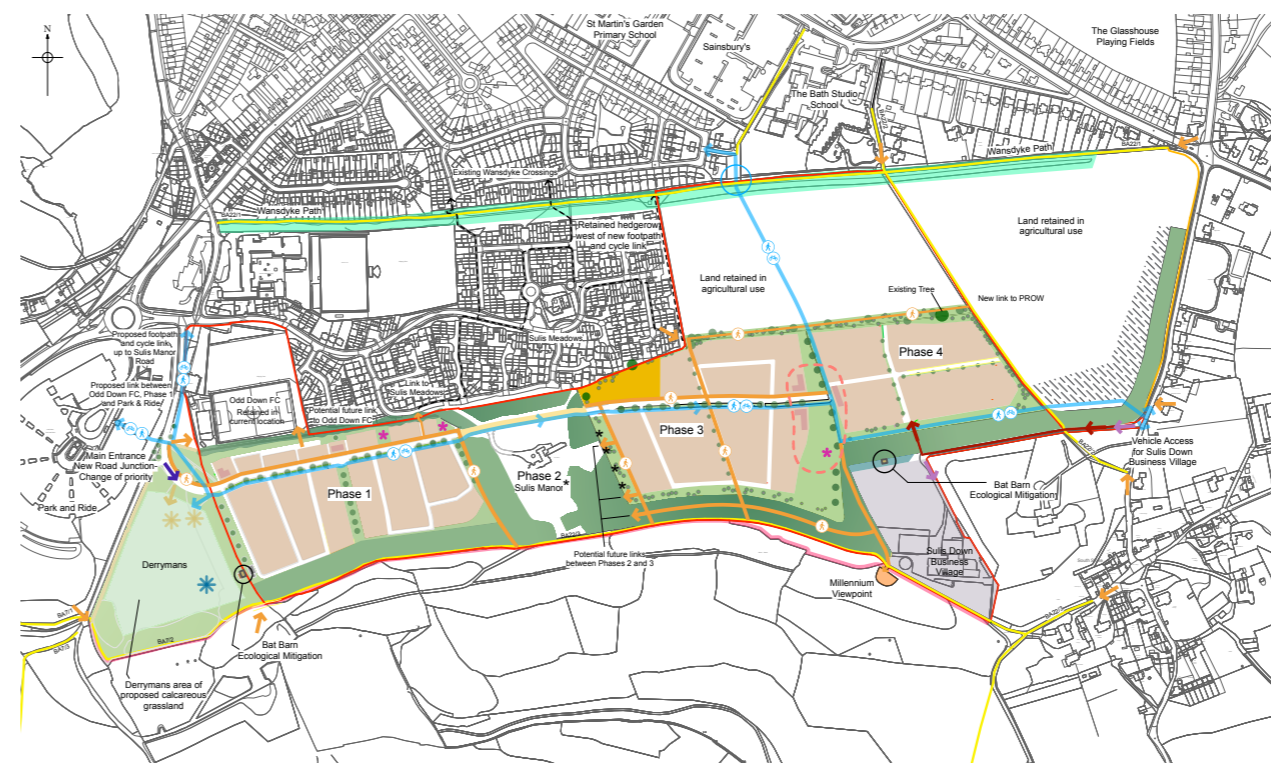
The Comprehensive Masterplan considers all phases of Sulis Down providing a framework for development that, in accordance with the placemaking principles set out in Policy B3A, will achieve an elegant and well- designed addition to the City of Bath at this important edge location.

The Comprehensive Masterplan was updated in response to feedback from the Council in 2018, the Section 106 Agreement and to updated studies. Following Pre-application consultation on Phases 3 & 4 in 2022/ 2023, Design Review and feedback from consultees. The Comprehensive Masterplan has been updated further for the Phases 3 & 4 outline application.

The owners of Sulis Manor have participated in the Comprehensive Masterplan, including agreeing the most appropriate vehicular access route to and across Sulis Manor to Phases 3 & 4. The detailed design for this spine road is included as part of the planning application.



Comprehensive Masterplan 2018 prepared as part of the Phase 1 application



Comprehensive Masterplan 2022-2023 prepared as part of the previous Phases 3&4 application

The Comprehensive Masterplan

The vision for Sulis Down is to create a beautiful new addition to the City of Bath, bringing forward a very high quality, sustainable, landscape-led proposal where landscape, ecology, architecture and materials combine with beautifully-designed public spaces and streets.

The Comprehensive Masterplan brings forward a layout in accordance with Placemaking Principles contained in the allocation Policy B3a.

Residential development is to be accessed from Combe Hay Lane in the west only as per the Phase 1 approved layout, apart from an emergency access route via Sulis Down Business Village that passes through Phases 3 & 4. The east-west spine road established as part of the Phase 1 approved layout will continue through Sulis Manor and across Phases 3 & 4 providing both the primary vehicular and pedestrian/ cycle route.

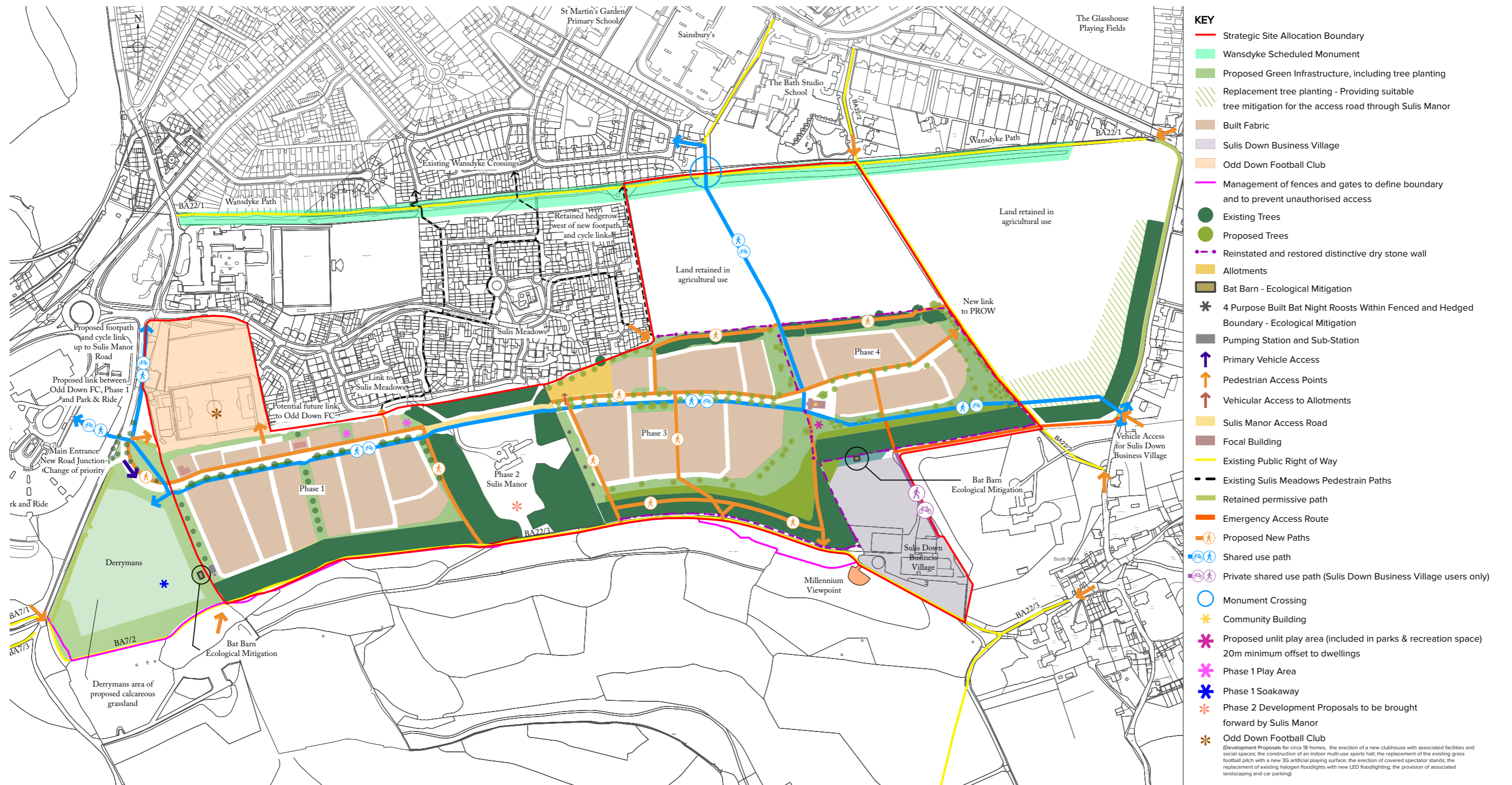
The layout for Phases 3 & 4 identifies a central heart green space alongside landscape buffers along the eastern, southern, and western boundaries with the built development set out around this landscape framework. Within the central heart there will be a new community building forming a focal point for Phases 3 & 4. No buildings are proposed in Great Broadclose, which remains in agricultural use.

Linkages are proposed north to the Wansdyke that can connect into the Walk Ride Bath Scholar's Way proposed route, encouraging wider connectivity across the City.

Sulis Down Business Village will continue sensitive redevelopment of the redundant farm buildings, maintaining access eastward, via Southstoke Lane and with improved pedestrian and cycle links. Emergency access will be directed via Sulis Down Business Village into Phases 3 & 4.

Development proposals for Odd Down Football Club are currently being considered and brought forward by the club

The Comprehensive Masterplan



FOUR

The Site

Green Infrastructure Context

Phases 3 & 4

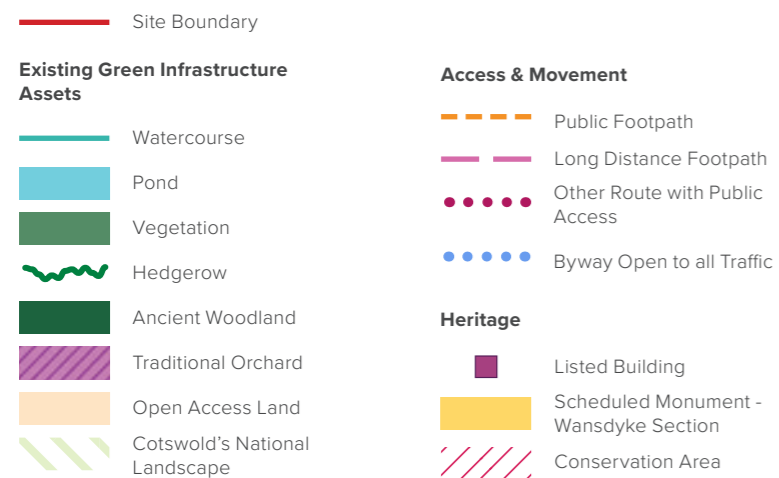
The Phases 3 & 4 Site is currently arable fields, with the true character of the Cotswold's National Landscape evident beyond the southern boundary, looking south across steep scarps, rolling valleys and wooded escarpments.

The Site is predominantly flat or gently sloping but to the south the ground slopes away more steeply and is covered by a dense tree belt. The southern escarpment slopes steeply and mature woodland marks this well-defined edge.

The young plantation woodland along the southern boundary is a valuable ecological corridor and is also currently well used for recreation through the existing PRoW and permissive routes that connect Odd Down, South Stoke and the southern fringe of the city. This southern tree belt is adjacent to The Fullers Earthworks and South Stoke Complex SNCI which includes ancient woodland associated with Rowley and Grove Wood.

The Wansdyke Scheduled Ancient Monument runs along the northern edge of Sulis Down and extends in both directions east to west, and well beyond the city. As a PRoW it is heavily used by pedestrians.

South Stoke, a historic village with many stone cottages and listed buildings is preserved within a Conservation Area, adjacent to the south east of the Site.



Green Infrastructure Influences

A number of Green Infrastructure drivers are relevant to the shaping of this landscape particularly in the context of the Cotswold National Landscape Management Plan (2025) which seeks to enhance and conserve the special qualities of the CNL.

1 ENHANCE PLATEAU EDGE

- Strengthen and link woodland edge planting
- Enhance and promote calcareous grassland as part of a wider Nature Recovery Strategies
- Retain and restore dry-stone walls

2 VALLEY SLOPE

- Enclosed Protect remnant areas of Ancient Woodland and encourage natural regeneration on neighbouring land
- Respect the visual integrity of South Stoke on upper slopes set within a well-treed landscape

3 COTSWOLD NATIONAL LANDSCAPE

- Contribute positively to Cotswold National Landscape green infrastructure increasing biodiversity, improving access, preserving views and aiding longer term stewardship

4 BATH WORLD HERITAGE SITE

- Manage urban rural transition through distinct and generous Green Infrastructure to provide clear separation between South Stoke and Land at Odd Down



Cotswold National Landscape Assessment (2025) classifies the Site as LCT9 High Wold Dip Slope, 9A Sulis Manor Plateau with LCT4 Enclosed Limestone Valley, 4A Cam and Wellow Brook Valley to the south



Site Analysis

SITE PHOTOS

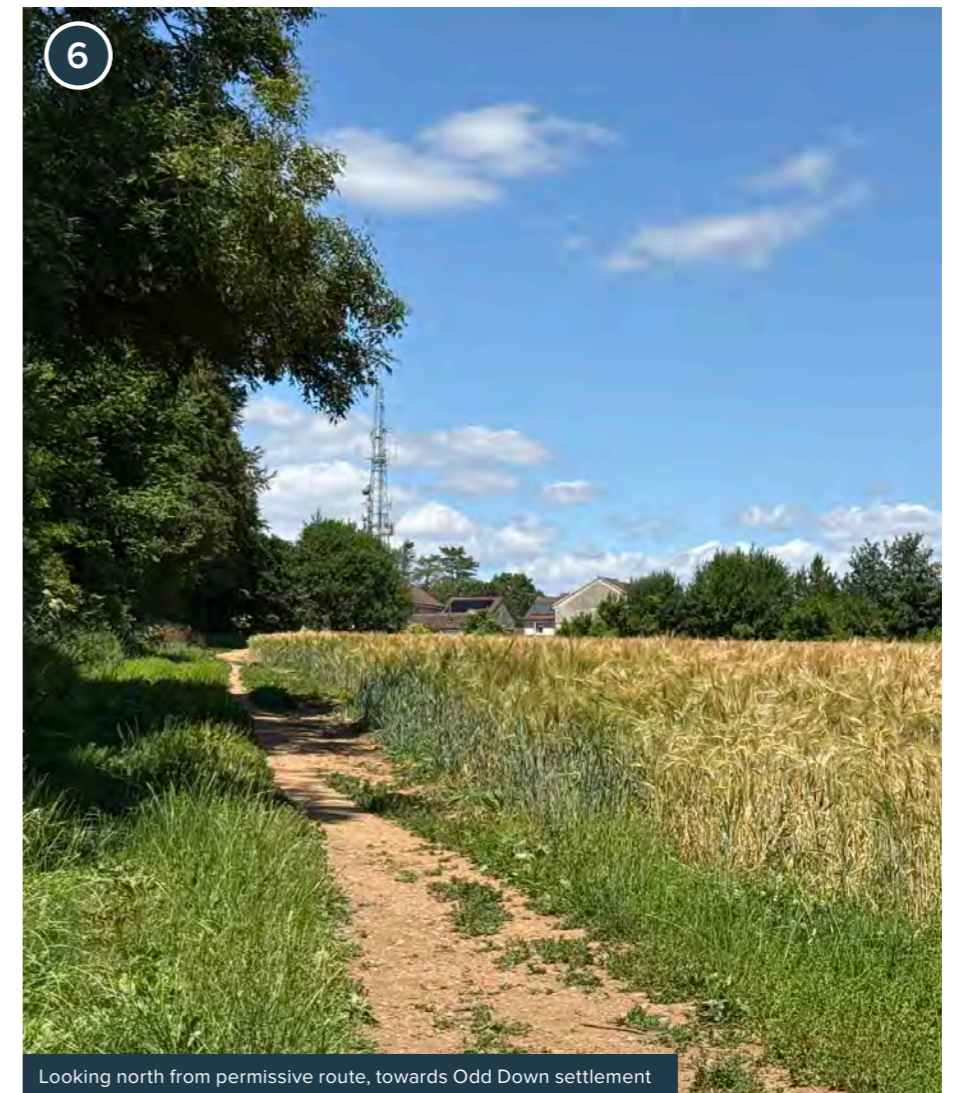
The photos, on the adjacent plan and following pages, include close range views of the Site and surrounding area to demonstrate character and existing features within the Site. Arrows on the plan indicate the photograph's location and direction of view.



- Site Boundary
- 1 Site photos on next page

Site Analysis

SITE PHOTOS



Site Analysis

ECOLOGY

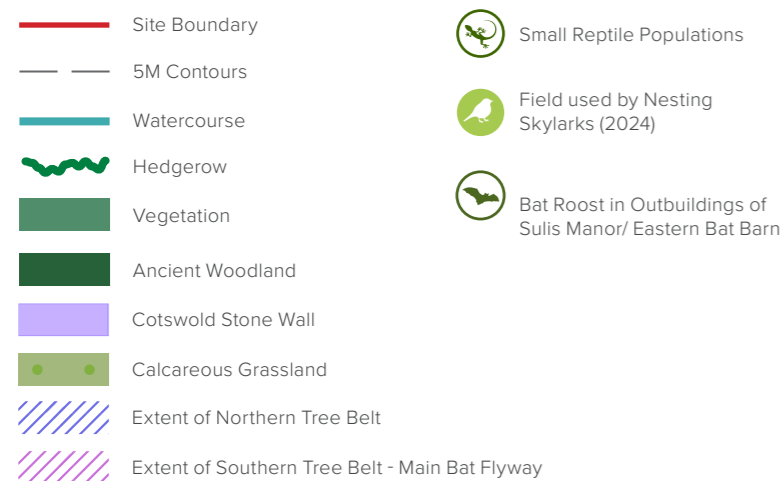
Sulis Down is home to a range of habitats and species; the main part of the Site comprises arable fields bounded by woodland plantations to the south and north. Dry-stone walls surround the arable fields, though most are now derelict they still support small populations of reptiles.

The mature woodland within Sulis Manor grounds is well known, it surrounds calcareous grassland and several outbuildings which are used by small numbers of bats.

Beyond the main Site three areas have been identified as potential mitigation sites; an arable field on the plateau for tree planting, two fields in South Stoke valley for skylark mitigation and Derrymans field on the western side of the plateau for grassland restoration.

Ecological surveys were carried out on these areas in 2024/25, the most important ecological features are:

- Mature trees surrounding Sulis Manor and the young tree belts that form the northern and southern boundaries of the Site
- Horseshoe bats including roosts within Sulis Manor grounds and an important bat flyway along the southern tree belt.
- Skylarks with small numbers breeding on the arable fields across the plateau.
- Hedgerows that define the southern boundary
- Dry stone walls that support reptiles such as slow worms and common lizards.



Policy B3a Placemaking Principle 5 - Respect and retain existing habitats and species present on Site through appropriate offsets, mitigation and new habitat creation, stitching into the proposed green infrastructure framework to benefit both people and wildlife.



Site Analysis

VALUABLE LANDSCAPE ATTRIBUTES

The Site mostly comprises arable fields, with existing vegetation associated with the boundaries and running north to south, splitting the Site into two parcels.

The woodland along the southern boundary is valuable for wildlife and screening views, although has suffered in recent years through Ash die back.

Trees associated with Sulis Manor have a Tree Protection Order (TPO), designated as a group across the Sulis Manor parcel and individual trees associated with the western boundary of the Site.

One TPO exists in the north eastern corner of the Site.

Opportunities

- Strengthen southern boundary woodland planting through management of the existing woodland and supplementation with a diversity of native species. The northern boundary planting offers similar opportunities.
- Establish and promote new calcareous grassland and wildflower meadow within the Site, along the extended and enhanced southern woodland edge.
- Retain and restore existing dry stone walls protecting their historical and ecological value.

Policy B3a Placemaking Principles 3 & 5 - Retain, enhance and celebrate existing valuable landscape assets to form a strong green infrastructure framework for the Proposed Development.

	Site Boundary		Tree Preservation Order (TPO)
	5M Contours		Tree Preservation Order (TPO) - Group
	Watercourse		Recommended Buffer / Offset From Key Assets: 10M - Hedgerow 15M - Woodland & mature Trees
	Hedgerow		Cotswolds National Landscape
	Vegetation		Public Footpath
	Ancient Woodland		Long Distance Footpath
	Traditional Orchard		View Point
	Scheduled Monument - Wansdyke Section		
	Cotswold Stone Wall		
	Calcareous Grassland		



Site Analysis

ACCESS & RECREATION

Running along the north of the Site is footpath BA22/1, Wansdyke Path that follows the Wansdyke Scheduled Monument that is heavily used by pedestrians. The Wansdyke PRoW footpath connects to BA22/2 footpath and permissive routes that lead into the Site.

BA22/2 runs parallel along the eastern boundary of the Site from the BA22/1 Wansdyke footpath to South stoke Lane, intersecting with two permissive routes that provide access into the Site.

BA22/3 Circuit of Bath long distance footpath runs along part of the southern Site boundary, providing four access points into the Site, panoramic views of the Cotswold National Landscape to the south and wider recreational routes around Bath and the surrounding landscape.

The Site is well used for recreation along a series of permissive routes that run around the perimeter of the arable fields within the Site and through the southern woodland belt.

The footpath network connects a series of local destinations including local schools, the Park and Ride to the west, Odd Down supermarket to the north and the Sulis Down business village to the south.

Opportunities

- Current permissive routes could be formalised as PRoW to increase accessibility and linkage
- A shared cycle and footpath link north to cross the Wansdyke will come forward as part of the application opening up a link north south to the Site

- Site Boundary
- Public Footpath
- Long Distance Footpath
- Permissive Routes
- Proposed Footpath
- Existing Pedestrian Access Points
- View Point



Site Analysis

TOPOGRAPHY & HYDROLOGY

The Site, part of Sulis Down, is located on a plateau, with the majority of the Site lying flat or gently sloping to the south. The southern escarpment slopes steeply and mature woodland marks this well-defined boundary edge.

The localised plateau has a high point of circa 174m AOD, with the Site gradually sloping down to circa 170m AOD in the south eastern corner of the Site and falling steeply to circa 167m AOD along the southernmost edge.

The Site is located wholly in Flood Zone 1, with little or no risk of fluvial or tidal flooding and defined as having less than a 1 in 1000 chance of flooding annually.

The Site is not at any risk of surface water flooding.

There is a minor watercourse circa 200m south of the Site which flows to the east along a disused canal towards Cam Brook.

Opportunities

- SuDS to be considered as an integral feature if applicable
- Consideration of built form will respond to existing contours and plateau

- Site Boundary
- - - 5M Contours
- Direction of Slope
- Localised Plateau
- Watercourse

Policy B3a Placemaking Principles 3, 5 & 6 & 11 - Understanding existing topography and hydrology of the Site will ensure built form heights are appropriate and that SuDS utilise the existing landfall, creating multifunctional green infrastructure corridors.



Site Analysis

HERITAGE

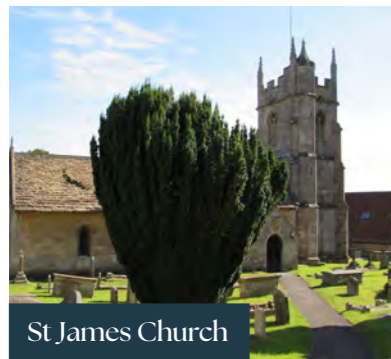
The World Heritage Site, City of Bath designation is located to the north and west of the Site, including the neighbouring existing settlements of Sulis Meadows, Odd Down and Sulis Manor.

The Wansdyke Scheduled Ancient Monument runs along the northern edge of Sulis Down and extends in both directions east to west, and well beyond the city. Featuring PRoW and permissive routes, it is heavily used by pedestrians.











South Stoke, a historic village with many stone cottages and listed buildings is preserved within a Conservation Area, adjacent to the Site.

Opportunities

- Notwithstanding the influence of the urban fringe of Odd Down and Sulis Meadows, opportunities to respect and reference the neighbouring Wansdyke, Sulis Manor and South Stoke Conservation Area will be considered.



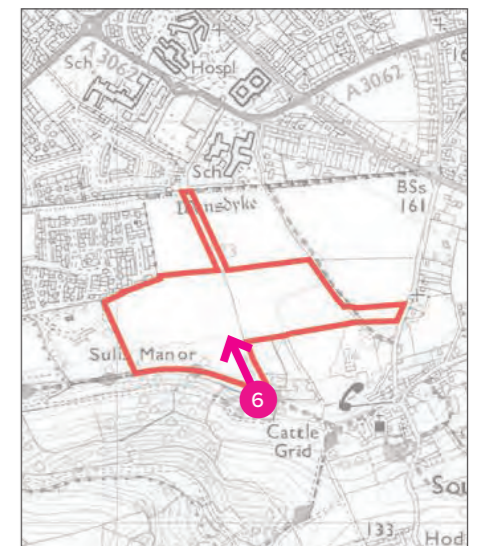
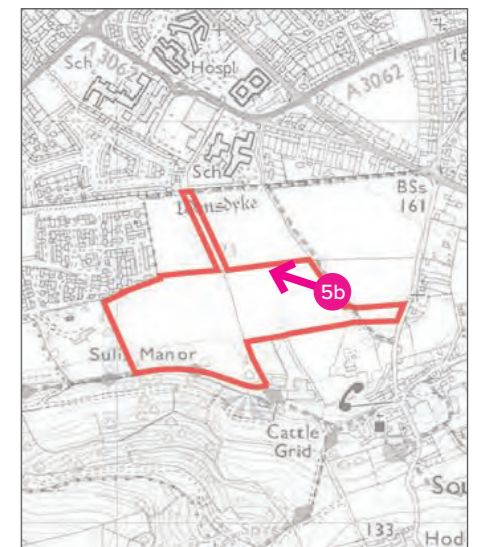
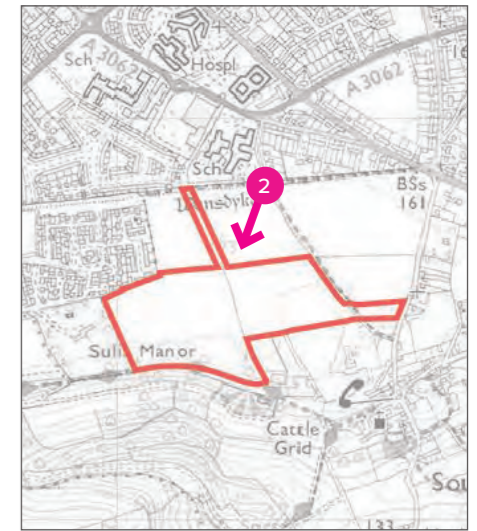
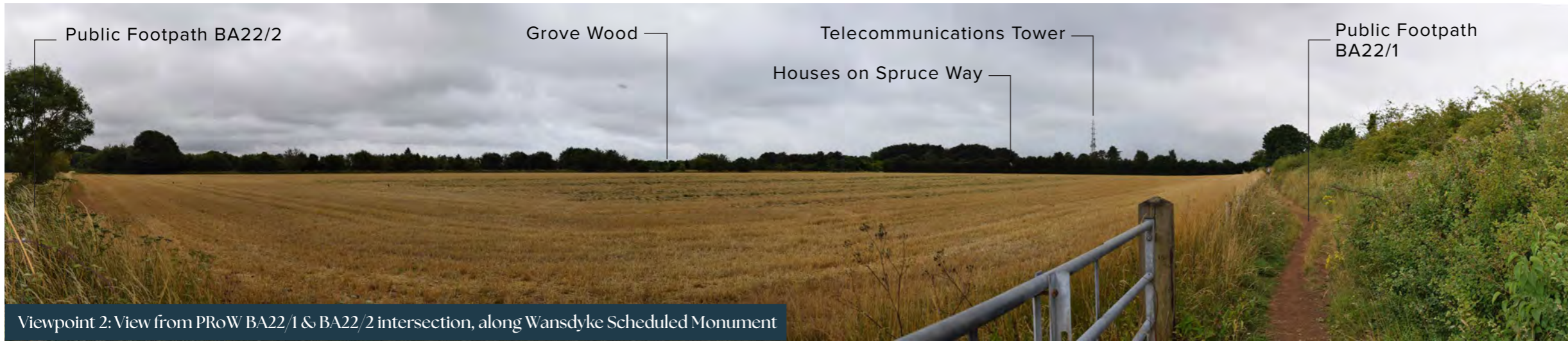
St James Church

- | | | | |
|---|---------------------------------------|---|-----------------------------|
|  | Site Boundary |  | Listed Building - Grade II |
|  | Ancient Woodland |  | Listed Building - Grade II* |
|  | Hedgerow | | |
|  | Vegetation | | |
|  | Scheduled Monument - Wansdyke Section | | |
|  | Cotswold Stone Wall | | |
|  | World Heritage Site - City of Bath | | |
|  | South Stoke Conservation Area | | |

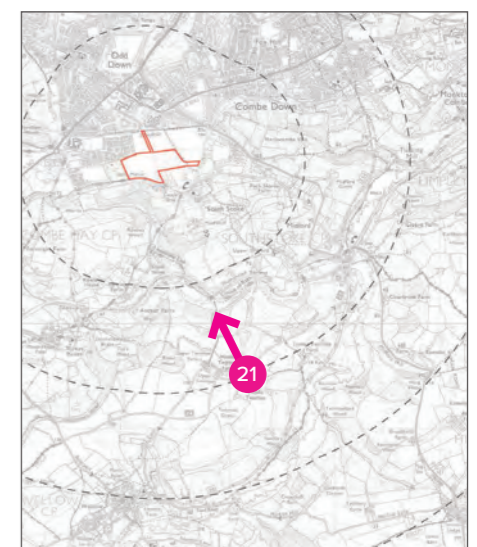
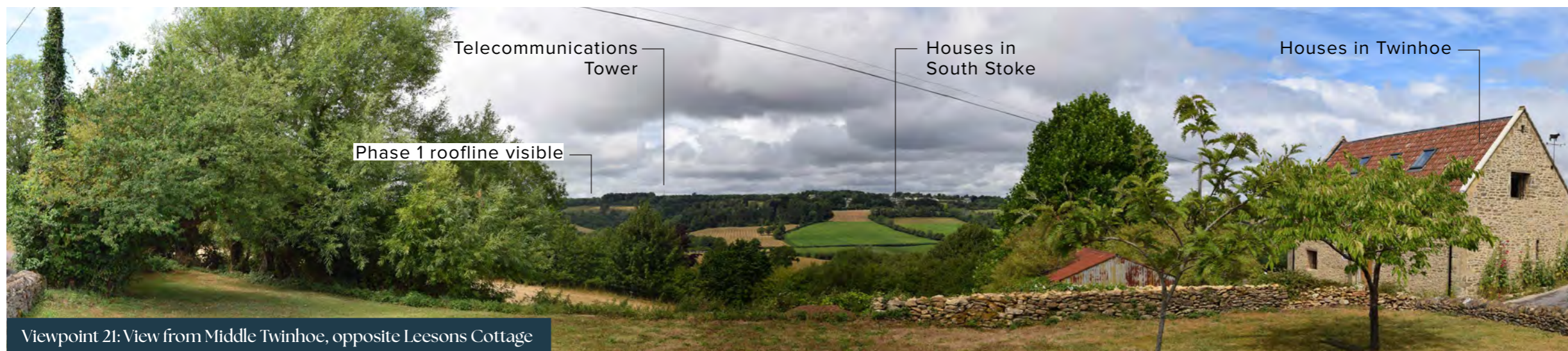
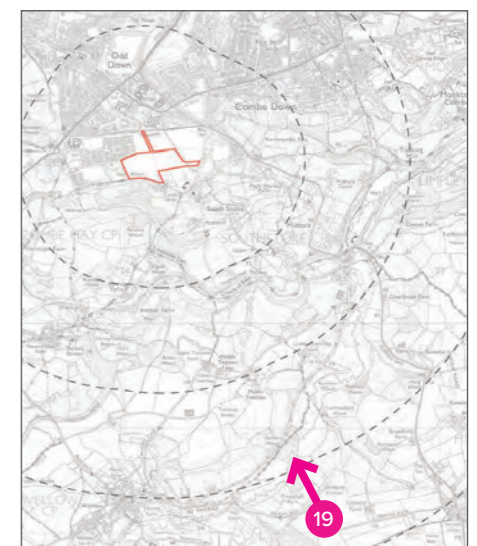
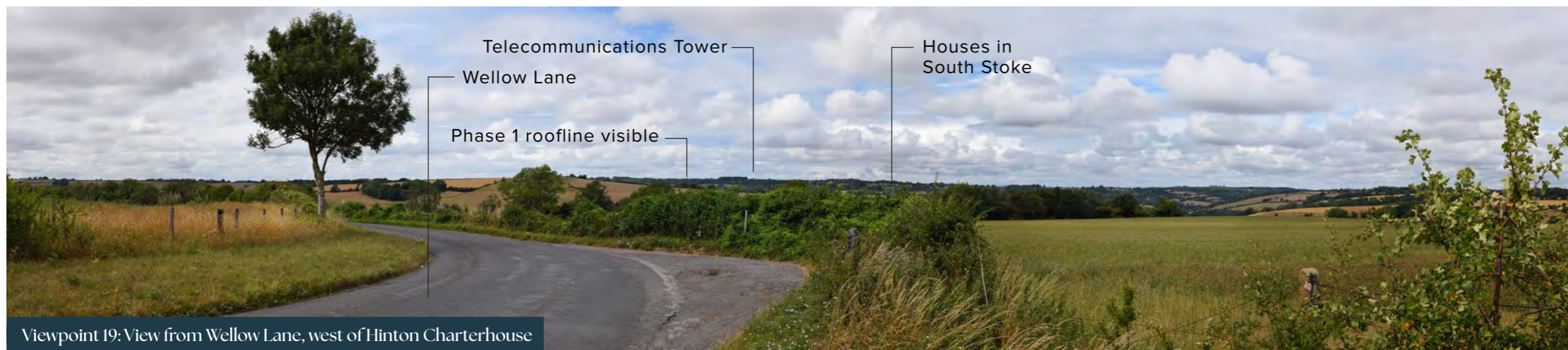
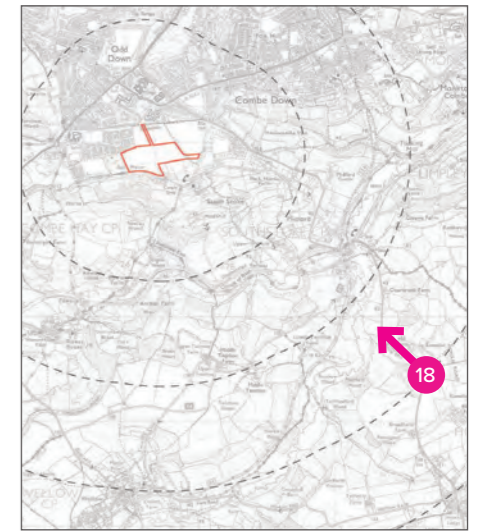
Policy B3a Placemaking Principle 6 - The creation of a strong green infrastructure framework will ensure the historic setting of South Stoke, Sulis Manor, Wansdyke Scheduled Monument and the World Heritage Site of Bath are safeguarded and celebrated.



Visual Context



Visual Context



Visual Context

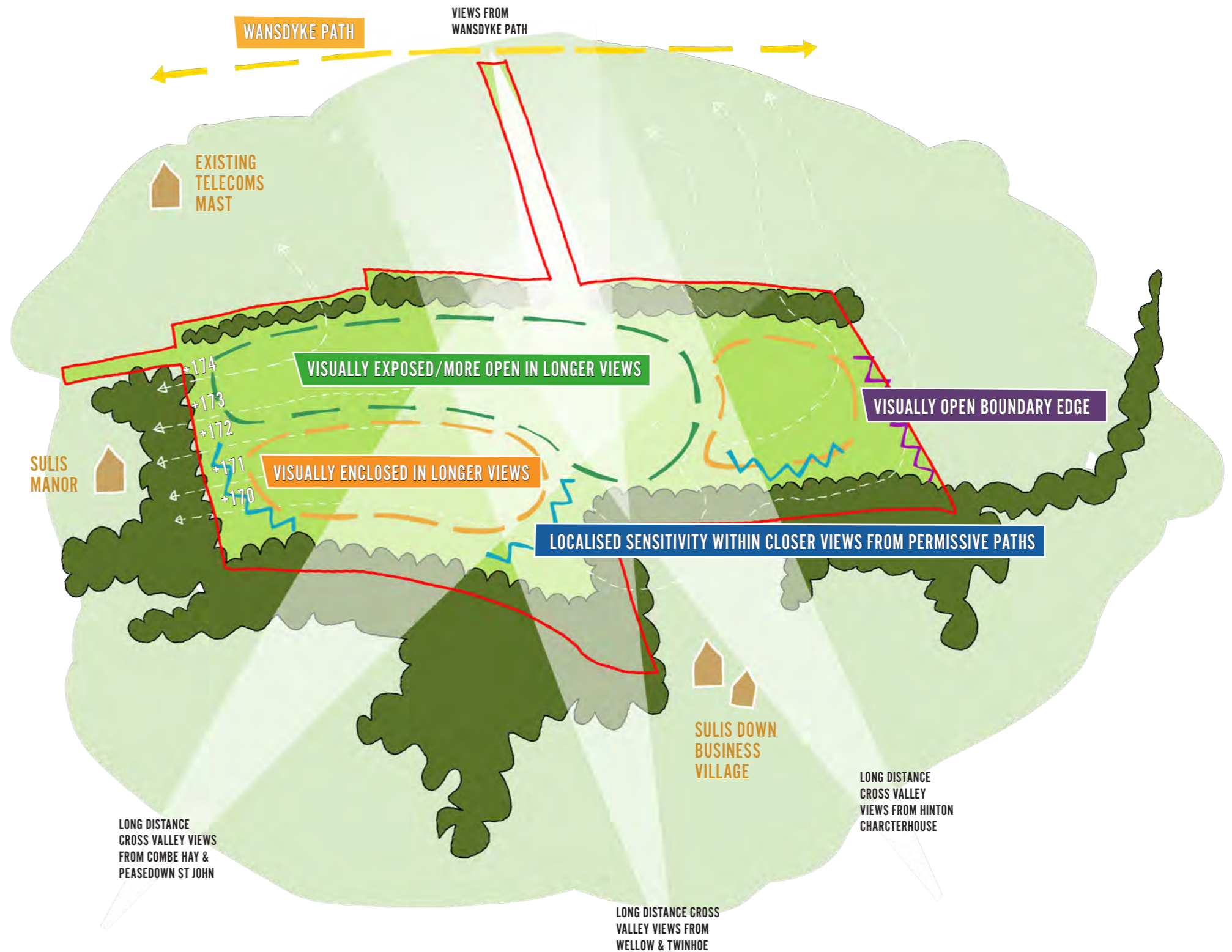
VISUAL CONTEXT SUMMARY

Within longer distance views:

- Sulis Plateau c. 174m AOD highest areas of landscape and visual sensitivity- taller properties would be visible in cross valley views from Cotswold National Landscape
- Urbanising influences are already present on the skyline within cross valley views (Phase 1 development, telecommunications mast Sulis Meadows)
- Tree belts to the south of the site form visible edges within cross valley views and screen the lower contours of the site within Phases 3 and Phase 4
- Visibility of built form above tree line on Phase 4 could create perceived coalescence with South Stoke from longer distance views

Within closer views:

- Permissive paths through woodland belts to the south mean a greater awareness of the current openness of the plateau notwithstanding the site allocation
- Lower contours are less visually sensitive within longer views, but proximity of development to PRowS should be considered in near distance views
- Views along BA22/2 are currently open and tranquil, development bordering this edge should take this into account
- Visual interaction with South Stoke Conservation Area to the south east will need to be carefully managed, reducing perceived coalescence



FIVE

Masterplan Evolution

Masterplan Vision

The site analysis identified a number of landscape design drivers to influence and shape the Phases 3 & 4 masterplan, to ensure an integrated development that will minimise in particular, the impact on Cotswold National Landscape and contribute to its special qualities and purpose.

“

Create a landscape-led neighbourhood that strengthens the green edge of Bath and contributes to the Cotswold National Landscape. It will respect the skyline of the Sulis Manor plateau, respect the rural setting of South Stoke and the heritage setting of Sulis Manor, and deliver connected, biodiverse spaces that promote health and community engagement.

”

REINFORCE STRUCTURAL PLANTING

Strengthen woodland belts and hedgerows to screen built form and enhance biodiversity

PRESERVE RURAL CHARACTER & SEPARATION

Maintain visual separation from South Stoke through strong green edges and low-impact development

MINIMISE VISUAL MASSING

Limit density and height; use stepped, varied forms to reduce visual impact

PROTECT & FRAME KEY VIEWS

Set development back from edges and maintain open views from key paths and landscapes

SAFEGUARD THE SETTING OF HERITAGE ASSETS

Retain a generous green buffer and integrate Sulis Manor and Wansdyke as heritage and placemaking assets

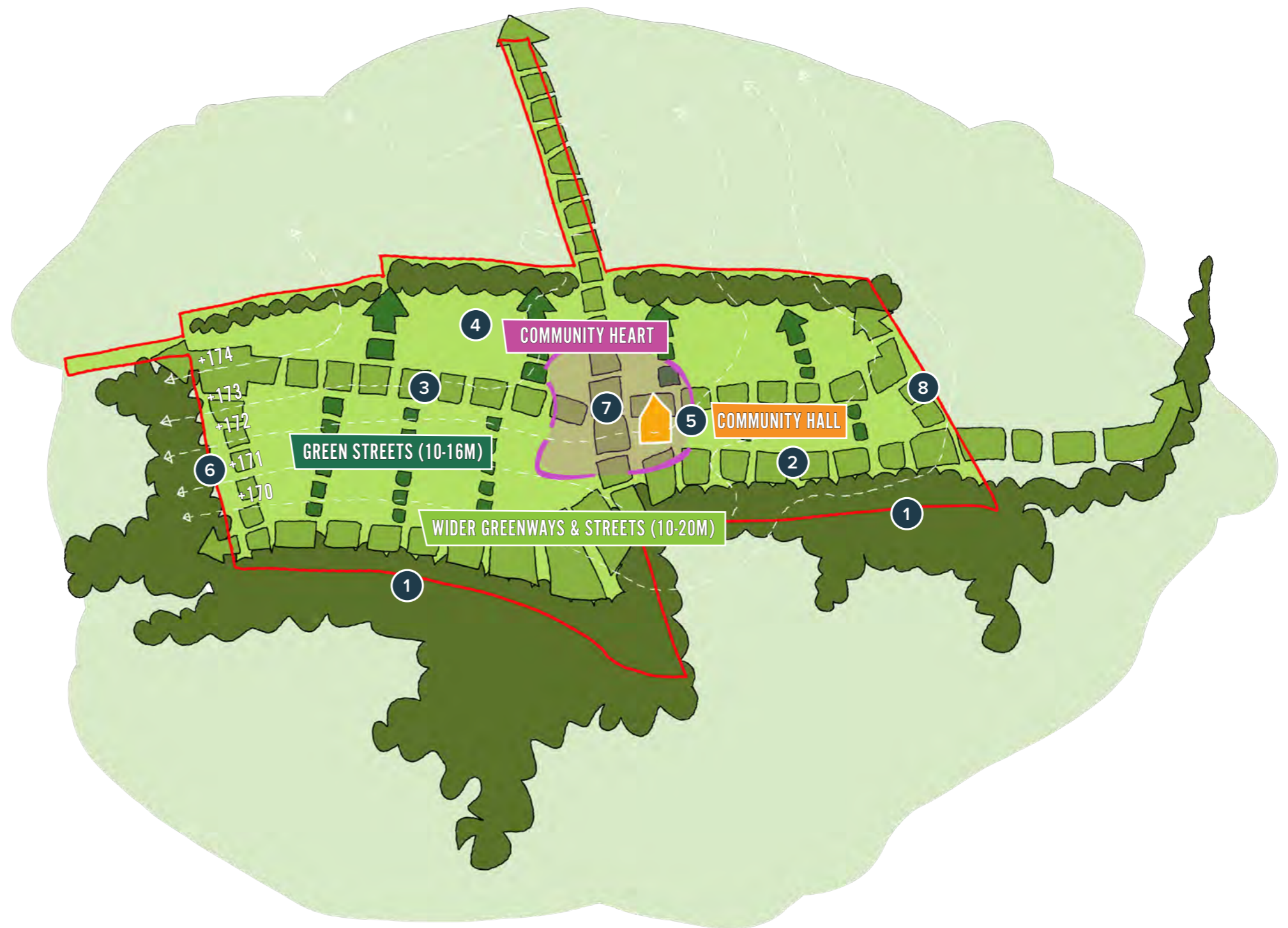
DELIVER A LANDSCAPE-LED STRATEGY

Secure early planting, habitat corridors, and long-term stewardship through a detailed LEMP and biodiversity plan

Concept Plan

LANDSCAPE & VISUAL CONCEPT PLAN

- 1 Enhance and strengthen the southern tree belt as a multifunctional visual, recreational, and ecological corridor
- 2 Deliver new native woodland edge planting and introduce transitional and multifunctional planting zones such as meadows, orchards, and shrub-rich edges between housing and woodland
- 3 Include wider streets and open space on upper contours to allow tree planting to mature to diffuse rooflines over time
- 4 Use 2-storey buildings on highest contours; allow 2.5 storey forms only in less visually sensitive or visually contained areas to avoid skyline breach
- 5 Location of new community hall at the centre of the neighbourhood
- 6 Safeguard the setting of Sulis Manor, with generous green buffers to integrate Manor setting with the wider green infrastructure
- 7 Create a considered gateway at junction with new route to the Wansdyke path to help minimise impact on Wansdyke and its setting
- 8 Introduce transitional green infrastructure on eastern boundary and reinforce green edge between Bath and South Stoke Conservation Area



Masterplan Evolution

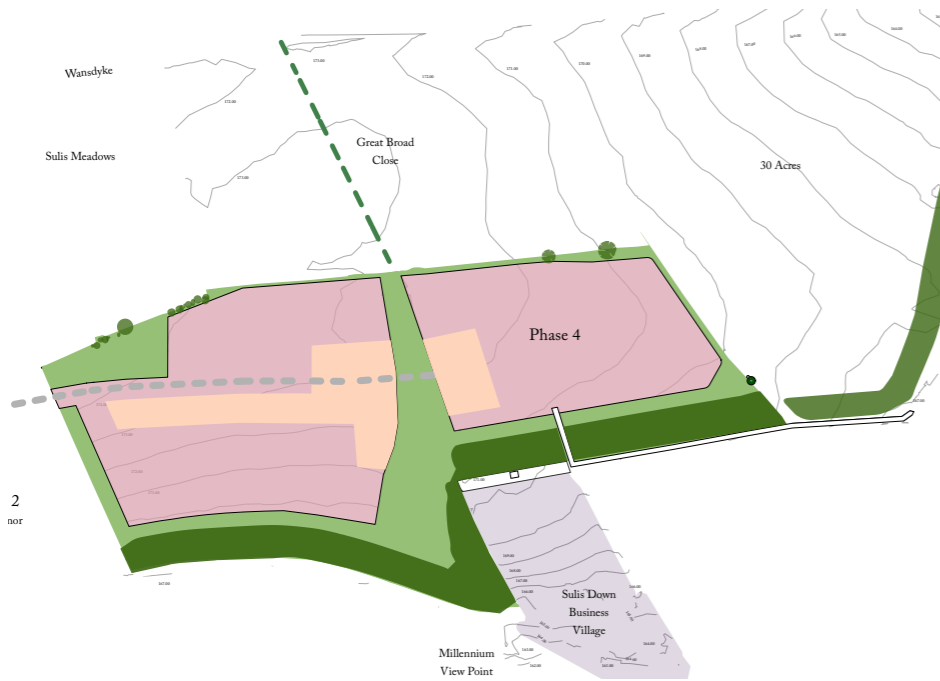
INITIAL TESTING SCENARIOS

A process of design evolution has been undertaken developing the layout parameters from the previous appeal scheme to a revised proposal for Phases 3 & 4. The developed proposal adopts the landscape and visual design principles identified to directly respond to the Inspector's comments.

Using the appeal scheme as a starting point a series of design changes were tested both in plan and using modelling to understand the landscape and visual impact.

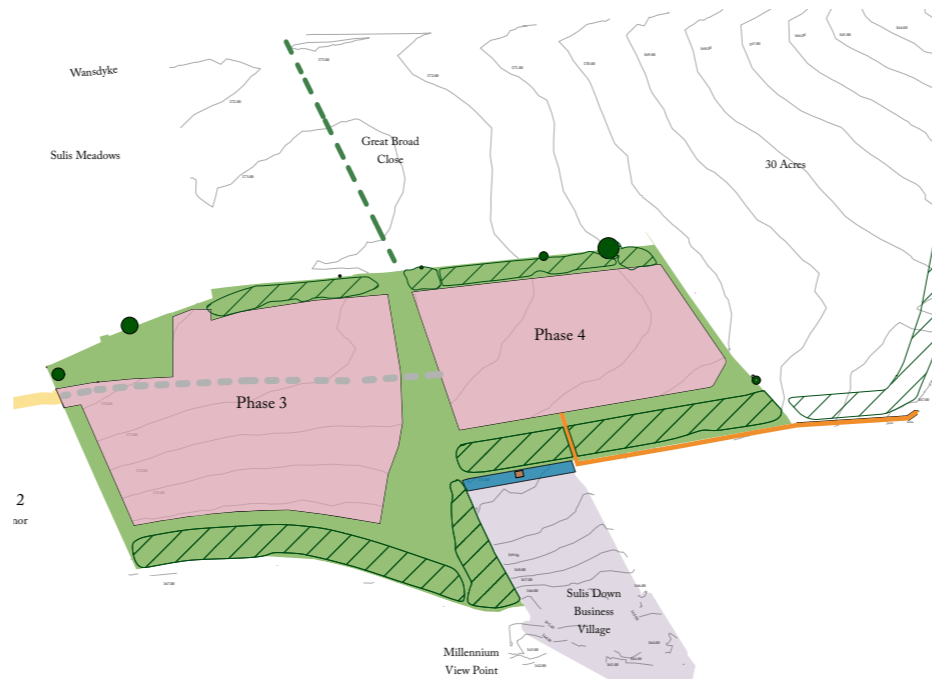
An initial test was undertaken where the existing northern tree belt was retained. A further layout test was then undertaken that incorporated the key landscape design

principles including an extension of the southern boundary and increased landscape on the eastern boundary. Two scenarios of this layout were modelled with building heights of 12m and 10.5m tested. This layout option also included provision for a community hall.



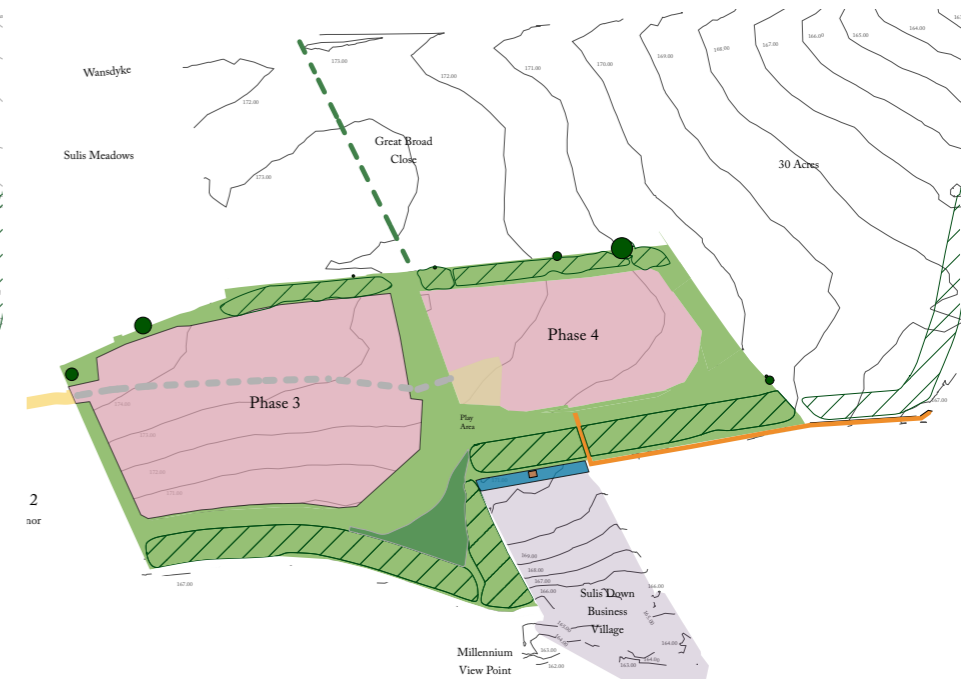
Appeal Scheme

Northern boundary vegetation removed,
no additional woodland,
14m height parameter
developable area extending to eastern boundary,
290 homes



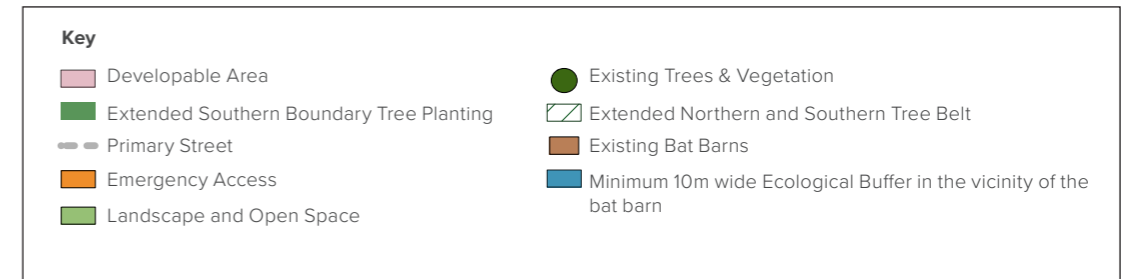
Initial Testing

Retention of northern boundary
Extension and strengthening of southern boundary
12m height parameter
Developable area extending to eastern boundary
c250 homes



Revised Proposal

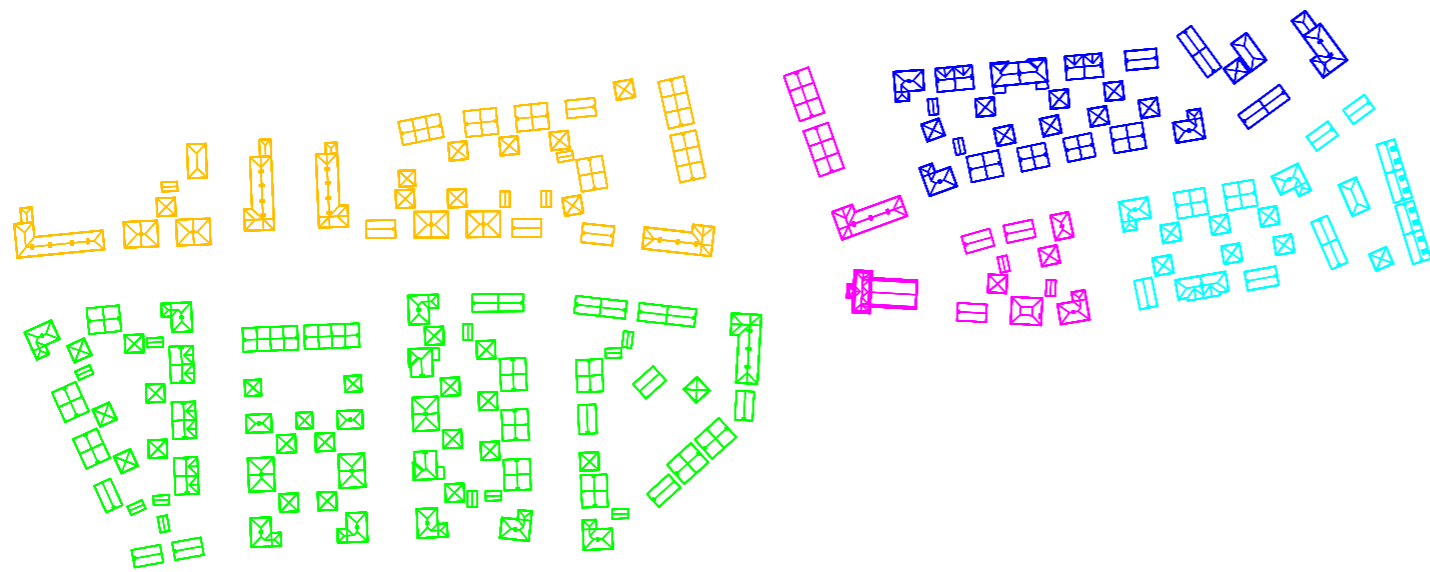
Retention of northern boundary
Extension and strengthening of southern boundary
12m & 10.5m height parameter
Developable area extending to eastern boundary
c220 homes



Initial View Testing

The adjacent and following images show the model testing of the revised proposals for Phases 3 & 4 considering 12m and 10.5m height parameter compared with the appeal scheme images showing 14m height parameter.

The testing highlighted the significant benefit with regard to the visual impact of the development seen in the long distance views of a reduction in the maximum height parameter down from 14m to 12m and 10.5m.

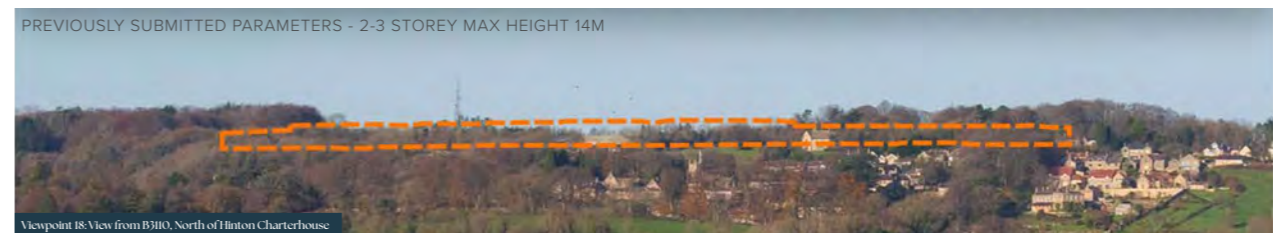
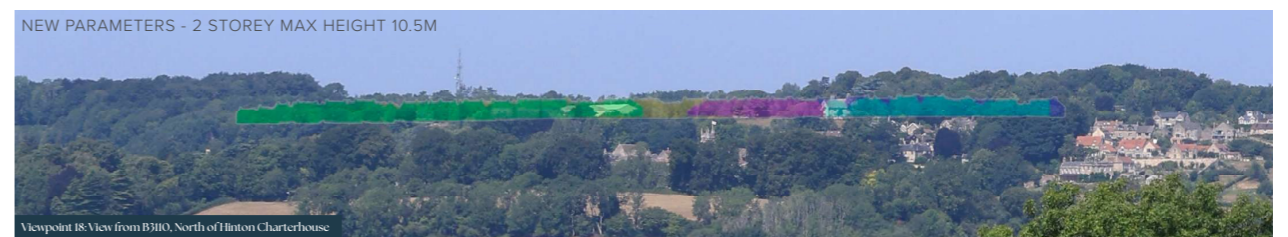


Plan showing model blocks with areas of housing shown in different colours so they can be identified on the long distance view montage images.

Long Distance View - Viewpoint 21



Long Distance View - Viewpoint 18



Initial View Testing

NEW PARAMETERS - 2-2.5 STOREY MAX HEIGHT 12M



Viewpoint 21: View from Middle Twinhoe, opposite Leasons Cottage

NEW PARAMETERS - 2 STOREY MAX HEIGHT 10.5M



Viewpoint 21: View from Middle Twinhoe, opposite Leasons Cottage

PREVIOUSLY SUBMITTED PARAMETERS - 2-3 STOREY MAX HEIGHT 14M



Viewpoint 21: View from Middle Twinhoe, opposite Leasons Cottage

Initial View Testing

NEW PARAMETERS - 2-2.5 STOREY MAX HEIGHT 12M



Viewpoint 18: View from B3110, North of Hinton Charterhouse

NEW PARAMETERS - 2 STOREY MAX HEIGHT 10.5M



Viewpoint 18: View from B3110, North of Hinton Charterhouse

PREVIOUSLY SUBMITTED PARAMETERS - 2-3 STOREY MAX HEIGHT 14M



Viewpoint 18: View from B3110, North of Hinton Charterhouse

Initial View Testing

Close Range View - Viewpoint 1

NEW PARAMETERS - 2-2.5 STOREY MAX HEIGHT 12M



Viewpoint 1: View from PROW BA22/1 Along the Wansdyke

NEW PARAMETERS - 2 STOREY MAX HEIGHT 10.5M



Viewpoint 1: View from PROW BA22/1 Along the Wansdyke

Pre-App Masterplan

PRE-APP MASTERPLAN SUMMARY

Following the testing and development of the layout parameters an illustrative masterplan drawing along with a supporting document setting out the 'landscape-led approach' was submitted as part of planning pre-application consultation with BaNES.

The pre-app illustrative layout incorporated the key landscape design principles including an increase in green space and a reduction in the developable area from the appeal scheme. Allotments provision for Phases 3 & 4 was proposed on the eastern boundary of the layout. A site was also identified for a community hall in the centre of the layout.

The developable area of the layout submitted as part of the pre-app was 5.44 hectares, a reduction of 1.85 hectares from the appeal planning application. Policy B3a requires a density of between 35-40 dwellings per hectare. A figure of around 210 dwellings was presented for the pre-app submission which equated to 38 dwellings per hectare.

The outcomes of the model testing regarding the height parameters were also included in the pre-application submission. Based on the assessment of the model testing scenarios it was proposed that the maximum height parameter should be 'up to 2.5 storey and 11m high'.



Illustrative masterplan submitted for pre-application process

Planning Engagement

PRE-APP FINDINGS

A pre-application request was submitted, and a presentation given in support of the pre-application, for this current proposal on 25th November 2025. A full summary of the response can be found in the Planning Statement - Appendix A. The following sets out the council's comments and the proposal's responses:

Council's Comments	Proposal Response
<p>Parks and Recreational Green Space</p>	<p>The proposal provides a Central Green Area from north to south, dividing the built form down the middle. This green area operates as a 'village green' and works in tandem with the central Community Building to provide a centralised location for social activity.</p> <p>As well as the central green, there are large areas of green open space in the south and eastern boundaries of the site, providing ample green space for the residents to experience. These areas include grassy meadows, comprising a play space set within a curved mound.</p>
<p>Placemaking Principles 1</p>	<p>The proposal comprises a primarily residential mixed-use development. The proposal comprises up to 200 dwellings on phases 3 and 4, and combined with the 171 approved and currently under construction in Phase 1, this results in a total of 371 dwelling within the allocation.</p> <p>It is confirmed that c.300 houses on this site is not a cap, as per the Inspector's comments.</p>
<p>Placemaking Principles 2 Preparation of a comprehensive Masterplan, through public consultation, and to be agreed by the Council, reflecting best practice as embodied in 'By Design' (or successor guidance), ensuring that it is well integrated with neighbouring areas.</p>	<ul style="list-style-type: none"> • The Comprehensive Masterplan comprises design elements which respond to comments from both the Inspector from the recent appeal on the previous scheme, and the Council's pre-application response. The design has also been informed by comments made during the recent public consultation. The following are the key changes that have been made in response to those comments. • The Masterplan has taken an increased landscape-led approach, in order to reduce the impact of the development on the wider landscape. • The number of homes has been reduced from 290 to 200, in order to accord with Placemaking Principle 1, and also reduce the impact of the development on the wider landscape. • All proposed homes will have a maximum height of 2.5-storeys, which is a reduction from 3-storeys of the previous development. • In addition, the overall built development has decreased, in favour of larger areas of green network. • The green corridors have increased in number and width, particularly through the middle of the Site. • A SuDS pond has been introduced in the southcentral area of the Site. These SuDS enable more effective drainage proposals, and enhance the biodiversity of the Site. • Screening has been bolstered around the edge of the Site, and particularly on the northern, southern and eastern boundaries. • A community building has been introduced. • Permeability across the Site facilitated with the introduction of foot and cycle paths. These paths link the Site to the existing built development to the west and northwest, and enable greater access to the countryside to the north, south and southeast.

Planning Engagement

PRE-APP FINDINGS

Council's Comments	Proposal Response
<p>Urban Design and Landscape Landscape and Visual Impact Assessment (LVIA) approach and methodology</p> <p>In light of the recent appeal decision, it is imperative that any forthcoming proposals demonstrate exceptional diligence to avoid or minimise adverse landscape impacts, especially those affecting the Cotswold National Landscape.</p>	<p>The proposal has taken a landscape-led approach to design, demonstrating exceptional diligence in the aim of avoiding, or at least effectively minimising adverse landscape impacts. Measures include:</p> <ul style="list-style-type: none"> Producing a landscape capacity plan, which will inform the proposal by understanding how much change or development the landscape can accommodate; Assessing several viewpoints in winter conditions, evidenced with win-ter photography (which is submitted with this proposal); Preparing and assessing up to 8 different layouts in order to find the optimal option for minimal impact on landscape, including on the Cotswold National Landscape; Enhancing and strengthening the northern and southern tree belts, including extensive tree planting on both boundaries, focussed on broad-leaved trees with a suitable shrub layer, and retentions of species rich hedgerows. As a result of the enhanced tree belts, screening has been bolstered around the edge of the Site, and particularly on the northern and southern boundaries.
<p>Heritage Reason for refusal 2 of application reference 22/02169/EOUT was as follows:</p> <p>“Heritage - The proposal, due to the quantum and extent of development, would harm the setting and Outstanding Universal Values of the City of Bath World Heritage Site and the Great Spa Towns of Europe World Heritage Site. This harm is less than substantial and would not be outweighed by the public benefits. The proposals would also result in unacceptable harm to the Sulis Manor non-designated heritage asset. The proposal is therefore contrary to the development plan, in particular policies B3a, B4 and HE1, and the NPPF, in particular paragraphs 201, 205 and 208.”</p> <p>The Council withdrew this reason for refusal and did not seek to defend it at appeal. However, The Rule 6 Party maintained their objection on this basis and therefore, heritage matters were reviewed at the appeal.</p>	<p>A Built Heritage Statement and Archaeological Impact Assessment accompanies this application. It reassesses the impact of the proposal on all the relevant heritage assets.</p> <p>Revisions to the proposal, such as the reduction in building heights, reduction in developed (hardstanding) area, and increased landscaping features have all contributed to a reduction in the harm to the heritage assets.</p> <p>Overall, the submitted Built Heritage Statement and Archaeological Impact Assessment (AIA), through its reassessment of the proposal’s impact on relevant heritage assets, maintains the same position as the previous application - the proposed development of the Site would have no impact on the significance of any designated heritage asset. It is considered that there is a minor level of harm to the significance of Sulis Manor, a non-designated asset. This will need to be weighed by the decision maker with the assets’ low, local level of significance, in line with the requirements of paragraph 216 of the NPPF.</p>

Public Consultation

PUBLIC CONSULTATION OUTCOMES

A public consultation was held in January 2026 in order to publicly share the revised proposals and demonstrate how the design for Phases 3 & 4 have been revised to address the Inspector’s findings from the previous appeal scheme.

Some of the key issues discussed were;

Number of houses- people were keen to understand the reduction in proposed dwellings from 290 homes proposed in the previous application to 210 dwellings.

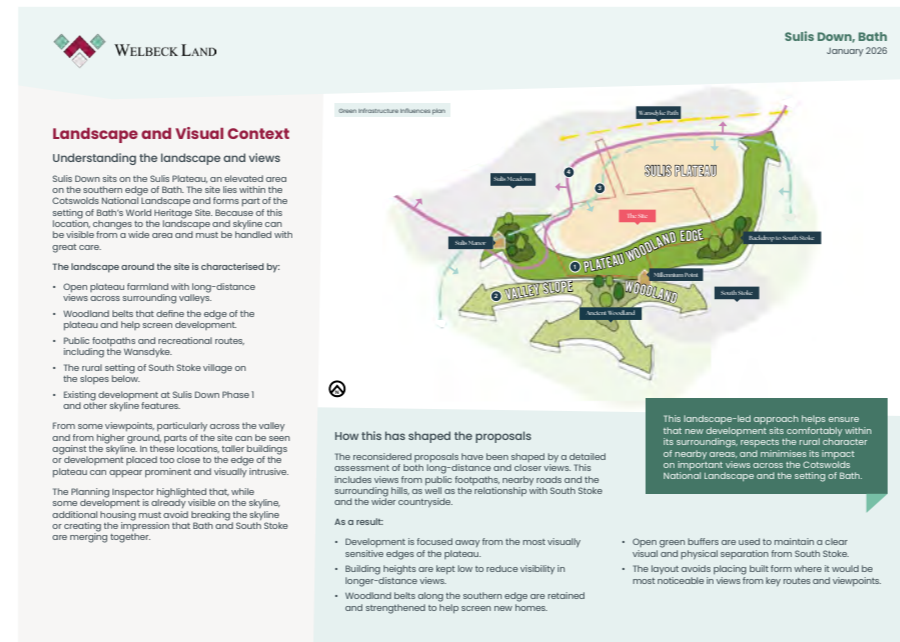
The location of the proposed allotments on the eastern edge- comments were made that this was considered a long way from the Phase 1 houses that these allotments would also serve.

Screening of buildings- do the proposed plans provide adequate screening of the new houses from the north, east and west? Could tree planting and green infrastructure be increased.

Story heights - limiting the buildings to 2-2.5 storeys would help reduce the visual impact of the site.

Community building - questions as to what this new community building would provide.

The following page lists out the key themes of the comments raised and how the design has been updated in response.



Public Consultation Display Material



Public Consultation event

Public consultation

FEEDBACK

Key Themes of comments	Response
<ol style="list-style-type: none"> 1. Principle of development 2. Scale and quantum of development 3. Landscape impact and views 4. Biodiversity and green infrastructure 5. Public open space 6. Community facilities 7. Affordable housing and housing mix 8. Traffic and transport 9. Access arrangements 10. Walking and cycling 11. Clarity and trust 	<ol style="list-style-type: none"> 1. The site is allocated for development in the adopted Local Plan. While in-principle objections are noted, the proposals have been revised to respond directly to the appeal decision by reducing scale, focusing development away from sensitive edges and adopting a landscape-led approach. 2. The proposals have been reduced from up to 290 homes to around 200 homes. Building heights have also been reduced to a maximum of 2–2.5 storeys. These changes respond directly to feedback and to the Inspector’s conclusions on landscape and visual impact. 3. Landscape considerations now lead the design. Development has been pulled back from the most sensitive edges, woodland belts have been strengthened, and generous green buffers introduced to maintain separation from South Stoke and protect key views. 4. The proposals include over 5 hectares of green infrastructure, strengthened woodland belts, new habitats, and measures to support biodiversity net gain. Feedback has reinforced the importance of landscape and ecology as a primary design driver. 5. Open space provision focuses on landscape-led green infrastructure, wildlife habitats and walking routes. Children’s play and allotments are also included, reflecting consultation priorities. 6. A new community building is proposed at the heart of the development. Feedback has informed the emphasis on flexibility and adaptability to meet a range of community needs over time. 7. The proposals include 40% affordable housing, in line with policy. The housing mix will be designed to respond to identified local needs and consultation feedback, subject to detailed design at reserved matters stage. 8. Transport impacts will be assessed through the planning application. The proposals include improved walking and cycling connections and will be supported by appropriate transport mitigation and contributions secured through planning obligations. 9. Access arrangements, including construction management, will be controlled through detailed application submissions and conditions. Feedback has highlighted the need for clear and robust management measures. 10. The proposals include new and improved pedestrian and cycle connections, informed by feedback on existing routes and movement patterns. 11. The current proposals respond directly to the appeal decision and are supported by parameter plans to provide clarity on scale, layout and landscape treatment. The consultation has sought to explain these changes transparently.

SIX

Masterplan Testing

Masterplan Testing

FURTHER DEVELOPMENT

The masterplan has been informed by a landscape-led approach underpinned by early visual capacity testing, including baseline analysis, ZTV mapping, site work and initial modelling. This work established an understanding of the site's landscape and visual capacity and identified the key design drivers for the scheme:

- Retaining and strengthening existing woodland boundaries, particularly to the south, whilst retaining vegetation to the north;
- Pulling built form back from the eastern edge to respect the relationship with South Stoke and reduce effects in near views;
- Lowering building heights to reduce apparent massing and avoid undue skyline interaction; and
- Respecting the boundary and setting of Sulis Manor.

These principles informed the initial landscape framework and early parameter design presented at pre-application stage in November 2025. The pre-application response supported this landscape-led direction, and was keen to see the evolving visual testing and the detail of the emerging boundary landscape strategy.

Following this, a more detailed iterative design testing process was undertaken to refine the parameters and respond to officer feedback and commentary from the public consultation. This built on the established landscape framework and tested a range of variables, including development heights, eastern setbacks and the width and structure of the southern boundary planting.

Through this process, the parameters were refined to strengthen containment, reduce visual effects and ensure the masterplan evolved from a clear understanding of landscape and visual capacity.

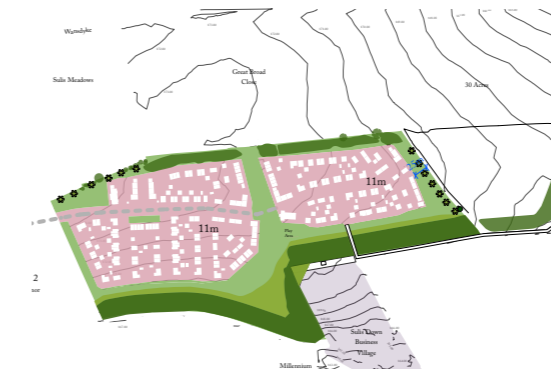
The following scenarios illustrate the iterative design testing carried out to refine the masterplan.

- Scenario 1 represents the dismissed Appeal scheme and is used as a comparative baseline.
- Scenario 2 reflects the early masterplan informed by the landscape-led approach and key design drivers, including retained, strengthened and extended vegetated boundaries to the north and south
- Scenarios 3 and 4 test alternative height parameters,
- Scenario 5 tested the effect of increased setback from the eastern boundary,
- Scenario 6 explores a more nuanced articulation of built form, and a change in built form to better address the south eastern gateway into the Site
- Scenario 7 tested the effect of pulling development back within Phase 3 to the 171m contour on longer distance views

These scenarios were modelled and tested using a selection of representative near and long distant viewpoints identified as the most sensitive to change. The full selection of representative views, approach to testing and findings can be found at Appendix 8.6 Iterative Design Testing.



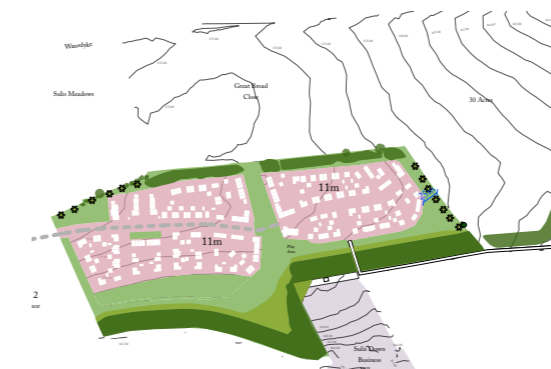
Scenario 1



Scenario 3



Scenario 5



Scenario 7



Scenario 2

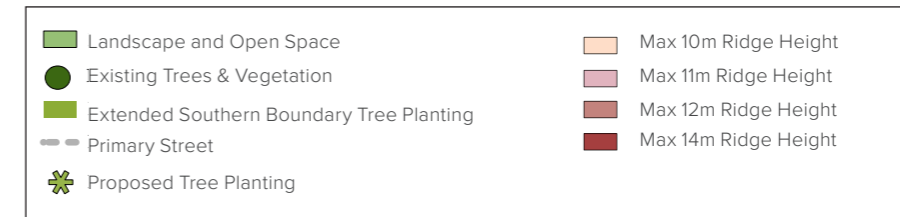


Scenario 4



Scenario 6

Masterplan Testing



Scenario 1: Appeal Scheme
 Northern boundary vegetation removed,
 No additional woodland,
 14m max height parameter
 Developable area extending to eastern boundary,
 290 homes



Scenario 2:
 Retention of northern boundary
 Extension and strengthening of southern boundary
 Developable area pulled back from eastern boundary by 25m
 12m max height parameter

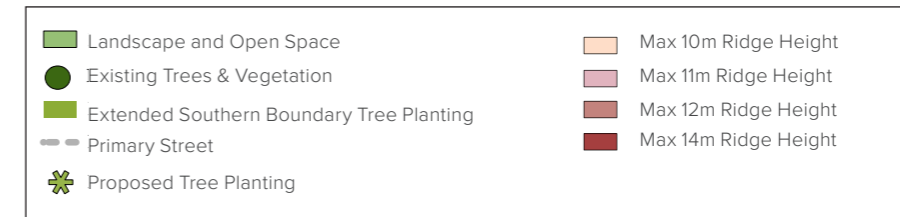


Scenario 3:
 Retention of northern boundary
 Extension and strengthening of southern boundary
 Developable area pulled back from eastern boundary by 25m
 11m max height parameter



Scenario 4
 Retention of northern boundary
 Extension and strengthening of southern boundary
 Developable area pulled back from eastern boundary by 25m
 10m max height parameter

Masterplan Testing



Scenario 5:
Retention of northern boundary
Extension and strengthening of southern boundary
Developable area pulled back from eastern boundary by 35m
11m max height parameter



Scenario 6:
Retention of northern boundary
Extension and strengthening of southern boundary
11m max height parameter
Developable area pulled back from eastern boundary by 25m
Development pulled back in south eastern corner
Introduction of lower height parameters to respond to key views



Scenario 7:
Retention of northern boundary
Extension and strengthening of southern boundary
11m height parameter
Developable area pulled back from eastern boundary by 25m
Development pulled back in south eastern corner
Development pulled back from the southern boundary in Phase 3 to the 171m AOD contour

Masterplan Testing

FINDINGS & OUTCOMES



Scenario 1 - Near Views - Viewpoint 1



Scenario 2 - Near Views - Viewpoint 1



Scenario 3 - Near Views - Viewpoint 1



Scenario 4 - Near Views - Viewpoint 1



Scenario 5 - Near Views - Viewpoint 1

The findings from the scenario testing has been summarised separately for near and longer-distance views below. Viewpoint 1 representing near views and Viewpoint 21 representing long distance have been used within the Design and Access Statement to demonstrate each modelled and tested scenario. Each modelled scenario represents the scheme at Completion (Year 0) during winter and without planting mitigation. It represents worst case scenario to enable a preferred scheme to be identified. The full selection of views, approach to testing and findings can be found at Appendix 3.6 Iterative Design Testing.

A full set of AVR's including mitigation were then preferred to model impact on all the viewpoints assessed as part of the Landscape and Visual Impact Assessment (LVIA). These can be found within Appendix 3.7 Accurate Visual Representations (AVR's).

Near Views

In near views, Scenario 2 showed that retention of the northern boundary vegetation makes a noticeable difference, particularly in views looking south.

Scenario 3 resulted in only marginal change in these closer views.

Scenario 4 made a marginal difference to the perception of massing in near views.

Scenario 5 opened up views when moving north along the eastern boundary, but this was not materially different in visual impact terms from Scenarios 2 and 3.

Scenario 6 reduced perception of height in the majority of near views, including addressing the eastern gateway into the Site more successfully

Scenario 7 did not give rise to any material difference in near views.



Scenario 6 - Near Views - Viewpoint 1



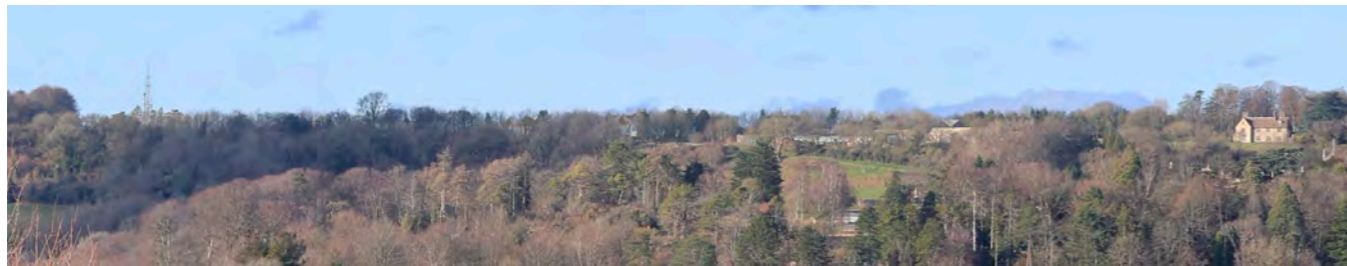
Scenario 7 - Near Views - Viewpoint 1

Masterplan Testing

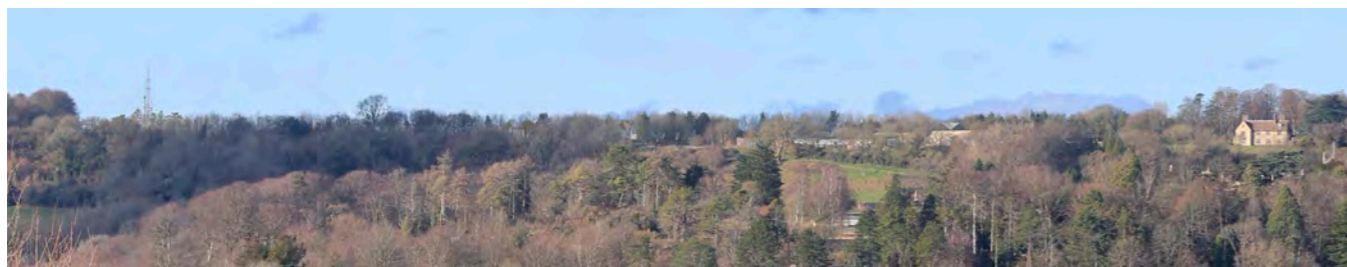
FINDINGS & OUTCOMES



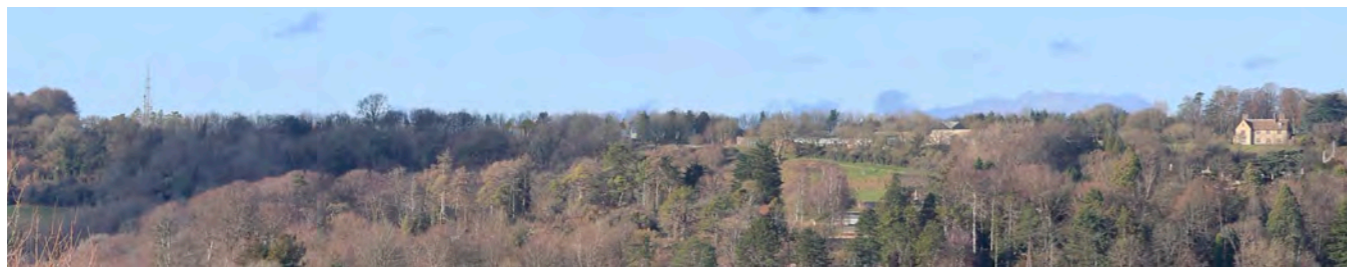
Scenario 1 - Longer-distance Views - Viewpoint 21



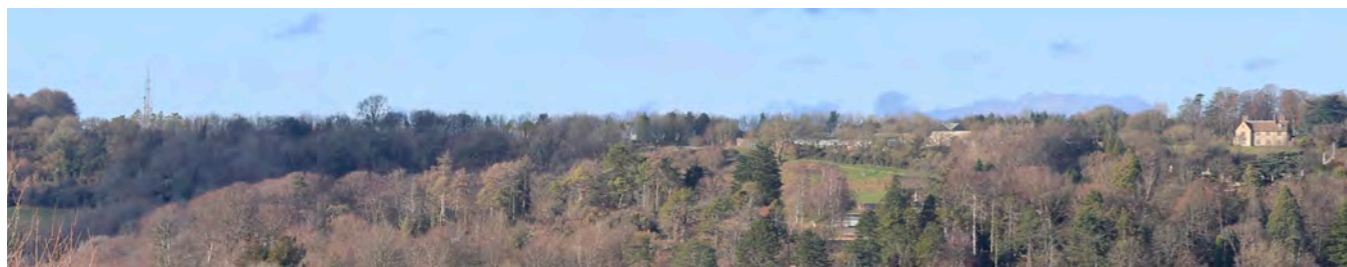
Scenario 2 - Longer-distance Views - Viewpoint 21



Scenario 3 - Longer-distance Views - Viewpoint 21



Scenario 4 - Longer-distance Views - Viewpoint 21



Scenario 5 - Longer-distance Views - Viewpoint 21

Longer-distance views

Scenario 2 demonstrated that lowered height parameters reduce visibility, although glimpsed views of built form remain more apparent in winter months.

Scenario 3 provided some further improvement in longer-distance winter views.

Scenario 4 offered no additional improvement in these longer-distance views.

Scenario 5 pulling back further from the eastern boundary is not perceptible.

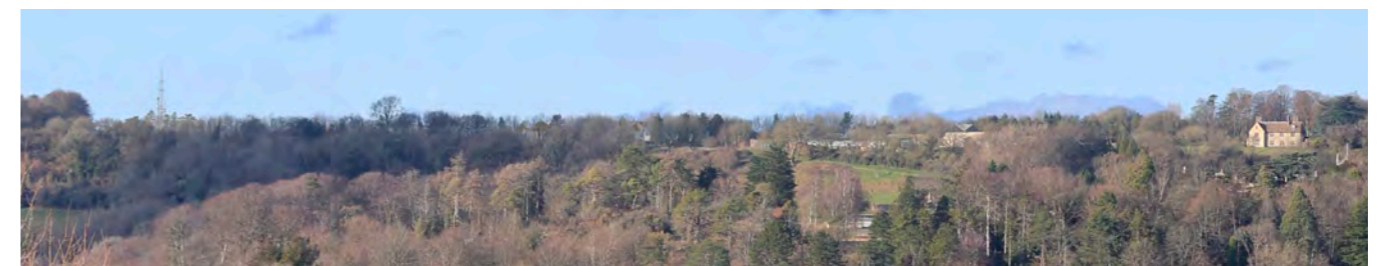
Scenario 6, built form remains barely perceptible within the view.

Scenario 7 also made no noticeable difference in longer-distance views.

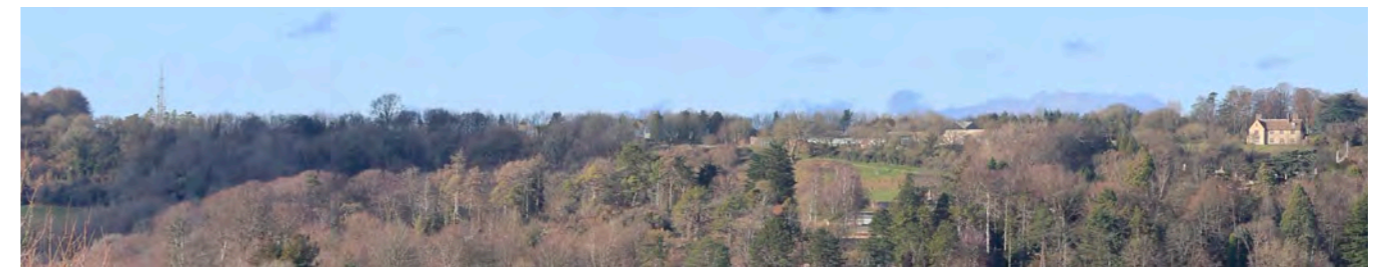
Conclusion

Overall, the scenario testing indicates that the most meaningful improvements arise from retention and strengthening of the boundary woodland combined with reduced height parameters, particularly in limiting rooflines against the skyline. Further reductions in a site wide maximum parameter height to 10m or pulling development further back from the eastern edge and southern boundaries, offer little or no additional reduction in magnitude of change.

The most successful **Scenario 6** balances retained and strengthened boundaries with an overall reduction in max height parameters to 11m (3m below the Appeal Scheme) to minimise influence on longer distance views and a lowered max height parameter (10m) to more sensitive edges, addressing localised views more purposefully. This preferred scenario has formed the basis for the overall masterplan.



Scenario 6 - Longer-distance Views - Viewpoint 21



Scenario 7 - Longer-distance Views - Viewpoint 21

SEVEN

The Masterplan

Masterplan Principles

MASTERPLAN PRINCIPLES SUMMARY

The design of Phases 3 and 4 has been guided by the site's landscape character, ecological significance, and heritage context, with a strong emphasis on sensitively integrating the proposed development within its natural surroundings. The layout has been informed by the following key principles:

- **Connected public spaces:** A network of open spaces is integrated with the built form to create a central community focus that supports civic activity and encourages interaction with the surrounding landscape. A new community building is proposed at the heart of Phases 3 and 4.
- **Protection of the southern tree belt:** The southern tree belt will be retained and strengthened through the provision of a buffer zone, safeguarding its role as a bat corridor and maintaining visual screening from the wider Area of Outstanding Natural Beauty.
- **Structural tree planting:** Extensive new tree planting is proposed along the spine road, central green corridor, and site boundaries to soften roof lines, enhance biodiversity, improve visual amenity, and increase climate resilience. Additional smaller-scale planting will be incorporated along secondary streets.
- **North–south green corridor:** A strong green link will run north to south through the site, connecting directly to the Millennium Viewpoint, breaking up the overall mass of development and providing visual and landscape continuity.
- **Recreational routes:** Walking and cycling routes will be provided along the site edges, creating connections between new and existing communities and the surrounding countryside.
- **Drystone walls:** Existing drystone walls will be retained and enhanced as key landscape features that contribute to local character and distinctiveness.
- **Block and street network:** Consistent with Phase 1, the layout adopts a clear and legible block and street structure informed by Garden City principles and the Arts and Crafts movement. Building materials will reflect the local vernacular and remain visually recessive within the wider landscape, including stone, render, and Cotswold-style roofing slates.



Illustrative sketch view of typical street with street trees



Illustrative sketch view of the proposed community hall



Stone



Render



Reconstituted Cotswold stone roof tile



Slate roof tile

Illustrative Masterplan

MASTERPLAN SUMMARY

- 1 Sulis Manor spine road
- 2 Primary Street lined with trees
- 3 Secondary Street lined with trees
- 4 Community hall
- 5 Southern Tree Belt with landscape buffer
- 6 Open green space
- 7 The Millennium View Point
- 8 Recreational paths providing links to and from the new development to the wider community and natural spaces.
- 9 Retained existing trees along the northern boundary
- 10 Protected and restored existing Cotswold stone walls and new walls to enhance the character of the AONB.
- 11 Potential field gate access to Great Broadclose with shared use path to the Wansdyke and Cranmore Place
- 12 Allotments for Phases 3 & 4
- 13 Possible SuDS location



Illustrative masterplan

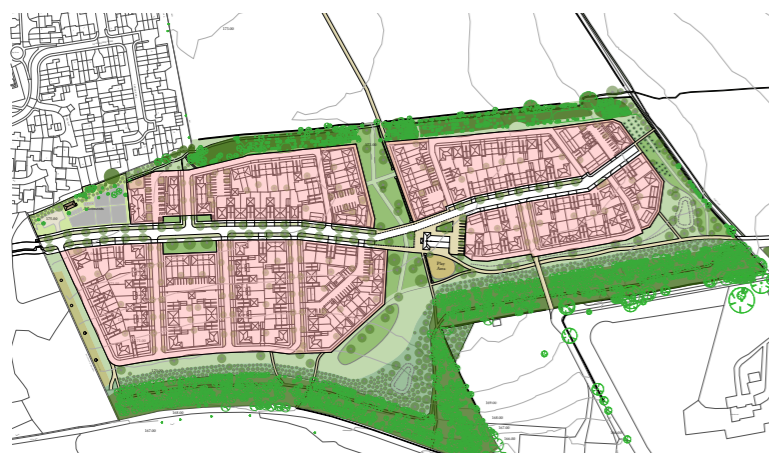
Land Use

Policy B3a of the Placemaking Principles within the BaNES Core Strategy states; 'The site should be developed at an average density of 35-40 dwellings per hectare' The number of residential units within Phases 3 & 4 Site Plan will be designed to be within this density range yielding a total unit count of up to 200 dwellings.

Land for public open space and green infrastructure required as part of the landscape, ecological and heritage design response is not included within the developable area that has been used to assess the number of dwellings.

A successful community has a variety of accommodation catering to a broad cross-section of society. It is proposed that Phases 3 & 4 will deliver a range of house types, comprising one and two bedroom flats, coach houses and two to five bedroom houses.

It will provide 40% affordable housing to a mix and tenure type agreed with BaNES Housing Services. It is intended that all affordable housing will be tenure blind and use the same material palette and details as the private units.



Developable Area

Developable Area - 5.4Ha
5.4Ha at 37 DPHA = 200 Units



Key:

- Phases 3 & 4
- Primarily residential
- Landscape and Open Space Existing
- Northern, Eastern and Southern Tree Belt
- Phase 2 Sulis Manor spine road
- Sulis Down Business Village
- Allotments
- * Indicative Location for Community Building

Building Heights




The previous outline planning application included maximum parameters of 'Up to 3 storey and 14m high'. A process has been undertaken to test the evolved layout and building height impact. Based on the findings of the LVIA and model testing it is proposed that the maximum parameter should be 'Up to 2.5 storey and 11m high' with 'up to 10m and 2 storey parameters to the boundary edges'.

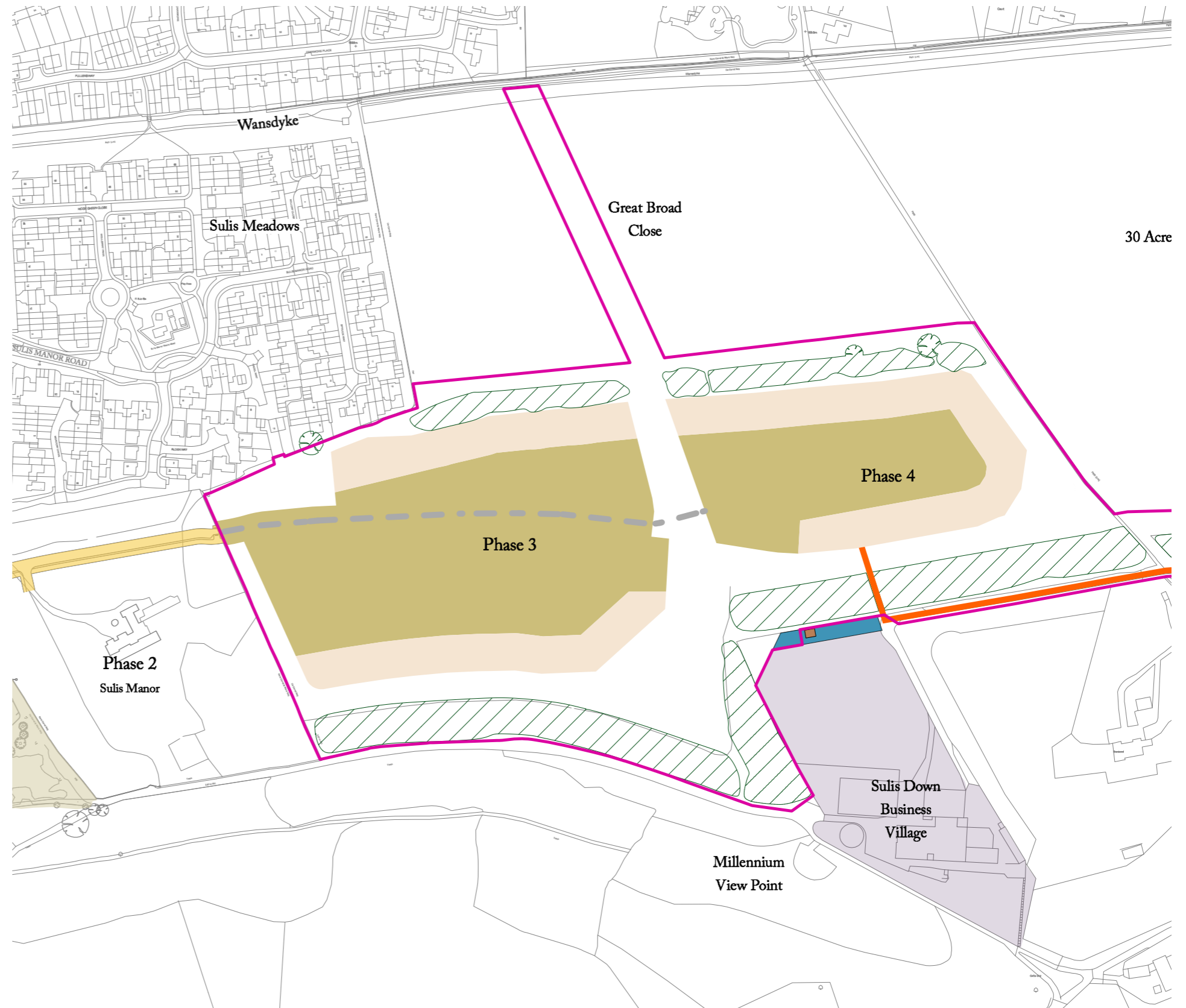
The Bath Building Heights Strategy (BBHS) identifies the Site as being within Zone 5- Plateaux. The recommended height for buildings and design guidance for this zone is as follows;

- Building shoulder height of 2 Storeys
- One additional setback storey is generally acceptable
- 1 additional storey (3 storey in total) could be acceptable where it aids legibility, for example local centres, creates better enclosure or provides regeneration benefits and does not intrude into views onto plateaux by exceeding the height of the tree cover
- It is advisable to define a cordon of non-development along with a landscape screen along the edge of the plateaux to prevent visual intrusion of development into the horizon line formed by plateaux edges and its vegetation from mid and long range views

The proposed maximum parameter of 2.5 storeys means proposals are compliant with BBHS

Key:

-  Phases 3 & 4
-  Up to 2 storey Max ridge height 10m above existing ground level Max 2 storey building shoulder height.
-  Up to 2.5 storey Max ridge height 11m above existing ground level.



Movement Strategy

Access to the site will be via an extension of the approved spine road (Application 17/02588/EFUL). Assessments confirm that this arrangement can safely accommodate refuse, emergency, and service vehicles.

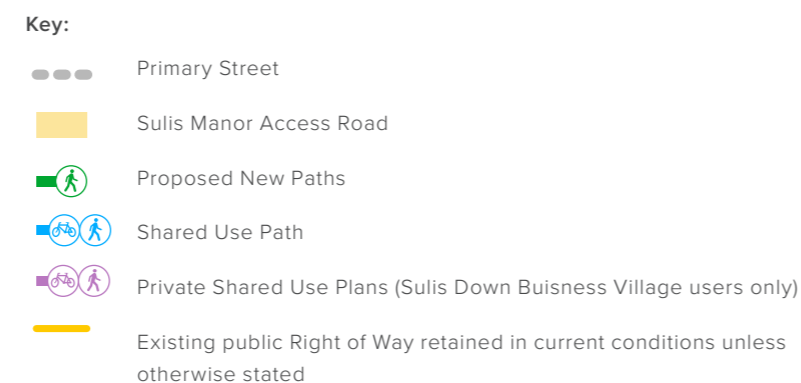
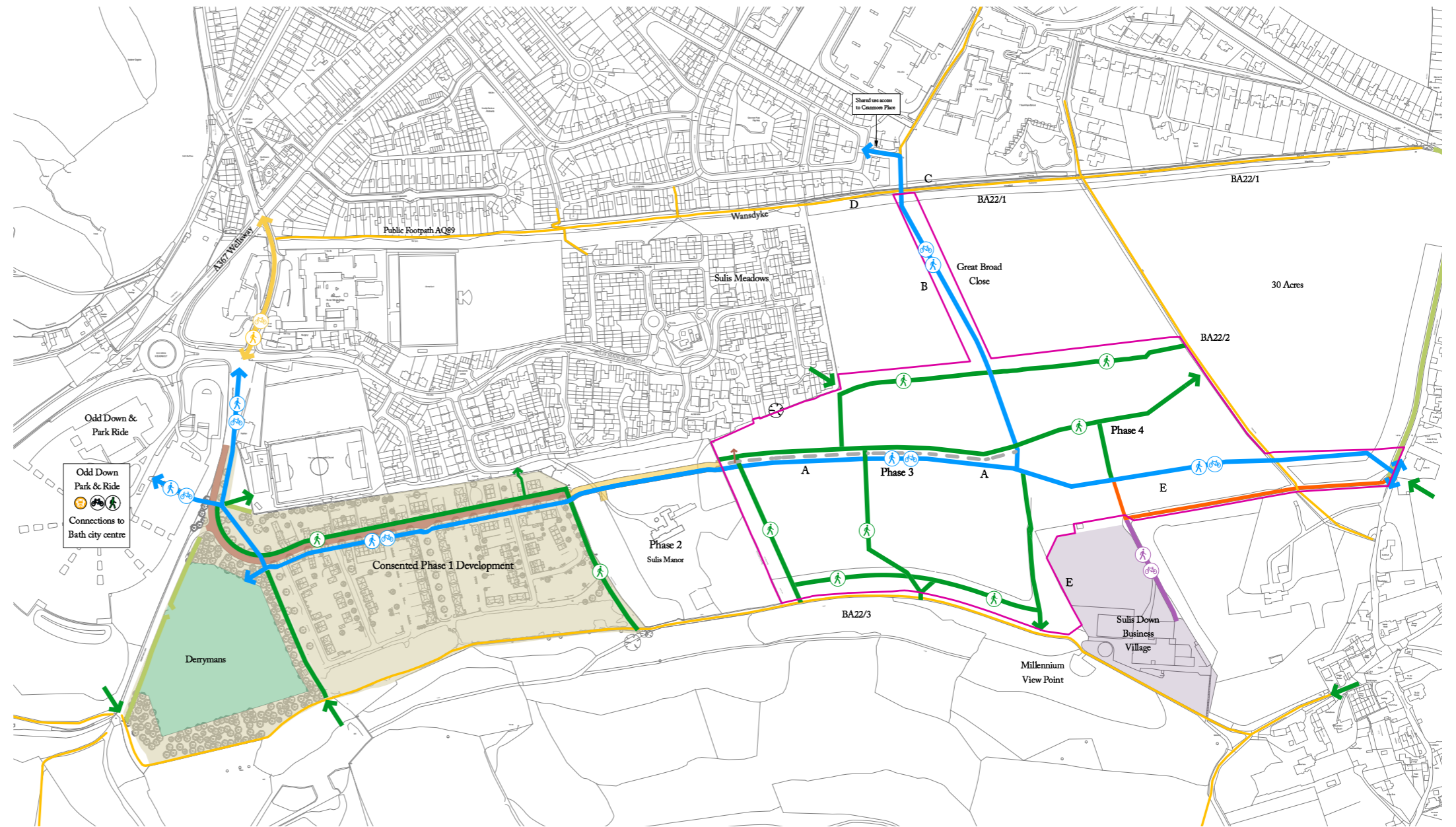
Sustainable travel links will connect the site to existing footways and cycleways within the consented development and the wider local area, strengthening the sustainable transport network across south Odd Down.

The internal street hierarchy follows Manual for Streets principles, taking inspiration from Bath's local character. Streets will be visually open and well-used, providing active frontages and suitable access to each home.

Street design will promote low vehicle speeds and considerate driving through varied street forms, shared spaces, and mews courts—creating a safe and attractive environment for walking and cycling.

A shared-use cycle route will run east–west from Southstoke Lane (north of the southern tree belt), through the central heart along the primary spine road to Combe Hay Lane, and across Great Broad Close and the Wansdyke. This connection will support future enhancements to the wider Odd Down and southern Bath cycle network.

Highway design complies with relevant policy and standards, providing safe access for all vehicles while encouraging active, sustainable travel and reducing car dependency for everyday journeys.



Lighting Strategy

The lighting strategy adopts a low-impact and carefully targeted approach, using warm-white LED luminaires with full cut-off to ensure light is directed only where required and with no upward light emission. Illumination is restricted to key movement routes, while areas such as minor paths, private drives, community gardens and allotments remain unlit to retain the natural night-time character of the site.

A key focus is the protection of the site's ecologically sensitive boundaries, particularly the southern dark corridor used by Horseshoe bats. Controlled lighting, buffer zones and careful luminaire placement ensure that illumination at site edges remains extremely low and compatible with the requirements for light-averse species. No lighting or built form is introduced within designated dark zones, and luminaires are oriented and shielded to prevent spill into adjacent habitats.

Across the development, a hierarchy of lighting zones and smart controls ensures lighting is used only when necessary. Measures such as dimming profiles, warm colour temperatures, low-height columns and PIR-controlled residential entrance lighting help minimise glare, sky glow and light presence. This enables the development to deliver safe and legible public realm while safeguarding dark-sky qualities, sensitive ecological corridors and the wider landscape setting

Key:

- Primary Roadways
- Residential Areas
- Unlit Communal Areas
- Unlit Exterior Circulation



Heritage Strategy

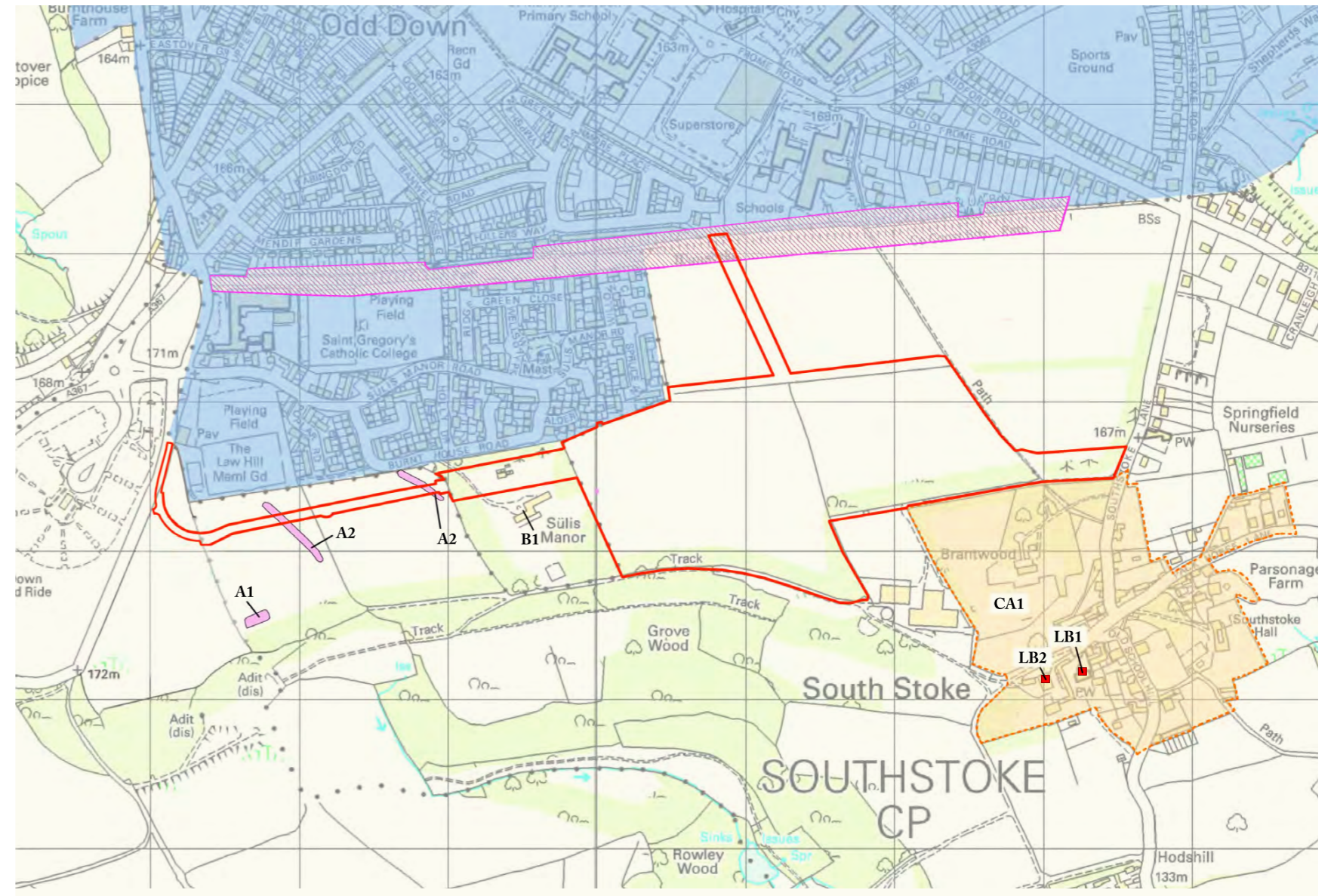
The evolution of proposals has been informed by a range of designated and undesignated heritage assets within and in proximity to the site. In addition, Placemaking Principle 6 of Policy B3a provides further design guidance in relation to these heritage assets. The following assets are considered relevant:

- City of Bath World Heritage Site and its setting
- West Wansdyke Scheduled Monument and its setting
- South Stoke Conservation Area and its setting
- A number of listed buildings in proximity
- The undesignated Sulis Manor

The design response to these heritage assets is intrinsically linked to the landscape and visual constraints and opportunities identified for the site, and as such the landscape-led design approach provides an appropriate response to these heritage assets.

The landscape principals are further supplemented by the following heritage design principles:

- Sensitively designed to respond to longer distance views towards
- World Heritage Site
- The northern boundary of the site should be sensitively designed with the setting of the World Heritage Site and Scheduled Wansdyke taken into due account
- Pedestrian links to the Wansdyke Scheduled Monuments will be considered
- Building heights and massing should be considered in respect to the impact on the World Heritage Site, and on opportunities to minimise impacts through the siting of development, the use of green infrastructure to break up built form and the selection of sensitive building materials will be explored
- The historic interior field boundaries within the site should be considered for retention/restoration where possible



Key:



Site Boundary



Listed Building



Wansdyke Scheduled Monument



South Stoke Conservation Area



World Heritage Site



Archaeology Receptors

EIGHT

Landscape Strategy

Landscape Strategy

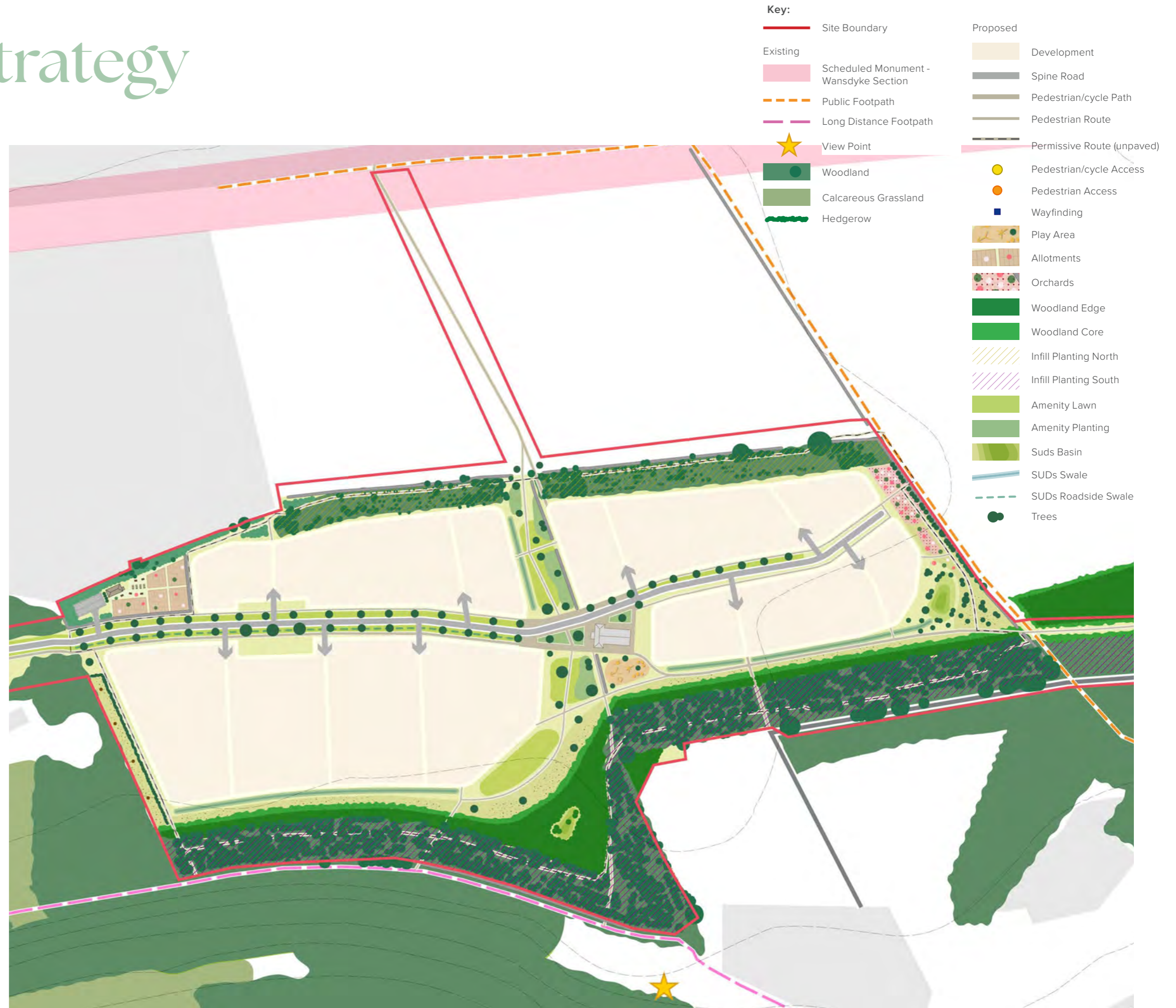
The landscape strategy for Phases 3 and 4 has been developed as an integral part of the masterplan, giving spatial expression to the landscape-led approach established through the site analysis, visual capacity work and capacity plan. It provides a Green Infrastructure framework within which, developable areas sit and through which, people, nature and movement are provided for across the site.

The strategy begins at the site boundaries, where existing woodland, tree belts and hedgerows to the north, south and east are retained and strengthened, supplemented by additional native tree, hedge and shrub planting to establish a robust and biodiverse edge structure.

Landscape boundaries transition into areas of meadow and calcareous grassland, creating a softer interface with the surrounding countryside and reinforcing connections with adjacent habitat areas associated with Sulis Manor and the upper slopes of the Cam and Wellow Brook Valley.

A network of connected green corridors extend through the site, linking productive landscape spaces including orchards, allotments and foraging routes with structural tree planting along streets and within key open spaces. Pocket greens are positioned at gateways and thresholds to help define points of arrival and transition, while a central village green, incorporating play, seating and informal amenity space, provides a focal point for community activity.

Together, these landscape components create a coherent sequence of spaces that supports movement, recreation, biodiversity and local distinctiveness, and ensures that the landscape framework is embedded within the structure and everyday life of the development.



Landscape Character Areas

The following pages introduce the proposed character areas that make up the development.

Each has been shaped by the design process to respond to its particular setting, landscape context, movement routes and role within the wider masterplan, whether as a gateway into the site, a wilder boundary, a recreational landscape or a quieter residential edge. Together they create a neighbourhood with a clear overall identity, but with variation in materials, landscape treatment, density, height, urban grain and dwelling type across the site.

Distinctive features such as tree species used as waymarkers, broad green verges and SuDS along key streets, orchard planting, dry stone walls and different landscape typologies help define each area and give it its own sense of place.

Further detail on each character area is set out on the following pages and will be refined at Reserved Matters stage

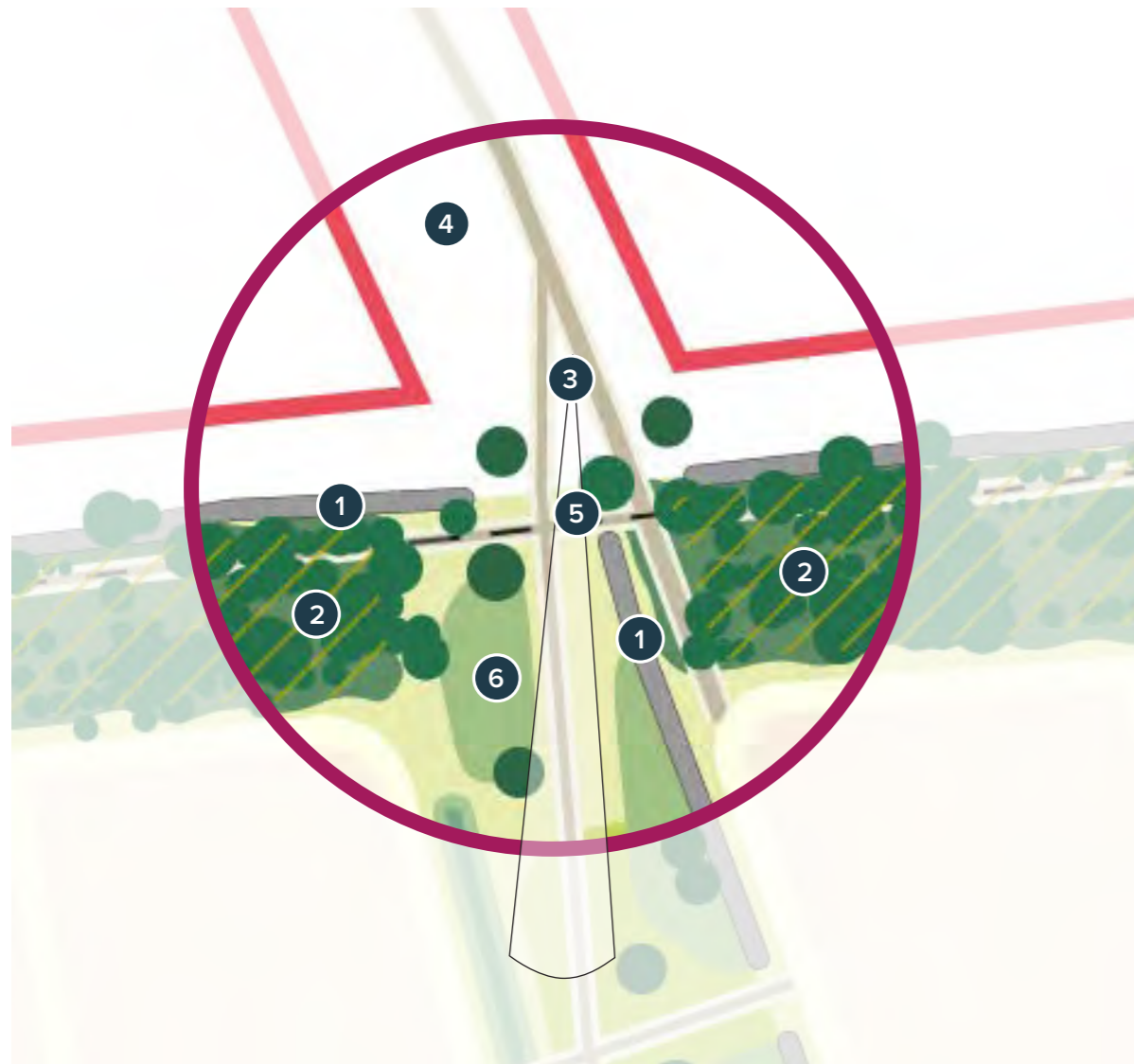


- 1 Wansdyke Gate
- 2 Linear Park
- 3 Play Area
- 4 Sulis Green
- 5 Allotments
- 6 Orchard
- 7 East Gate Meadow

Landscape Character Areas

WANSDYKE GATE

1. Cotswold stone walls to be retained, restored where necessary and integrated into the landscape setting, marking the threshold to the new development.
2. Existing vegetation retained to maintain ecological connections and screen the development.
3. Framed views on the approach to the development.
4. Retained arable land either side of the proposed Wansdyke footpath with the transition between the more rural and recreational landscape either side of the wall.
5. Opportunities for wayfinding or sculpture reference to the Wansdyke and to mark the entrance to the development and reference permissive routes.
6. Feature trees and planting to form part of the linear park.



Landscape Character Areas

VILLAGE GREEN

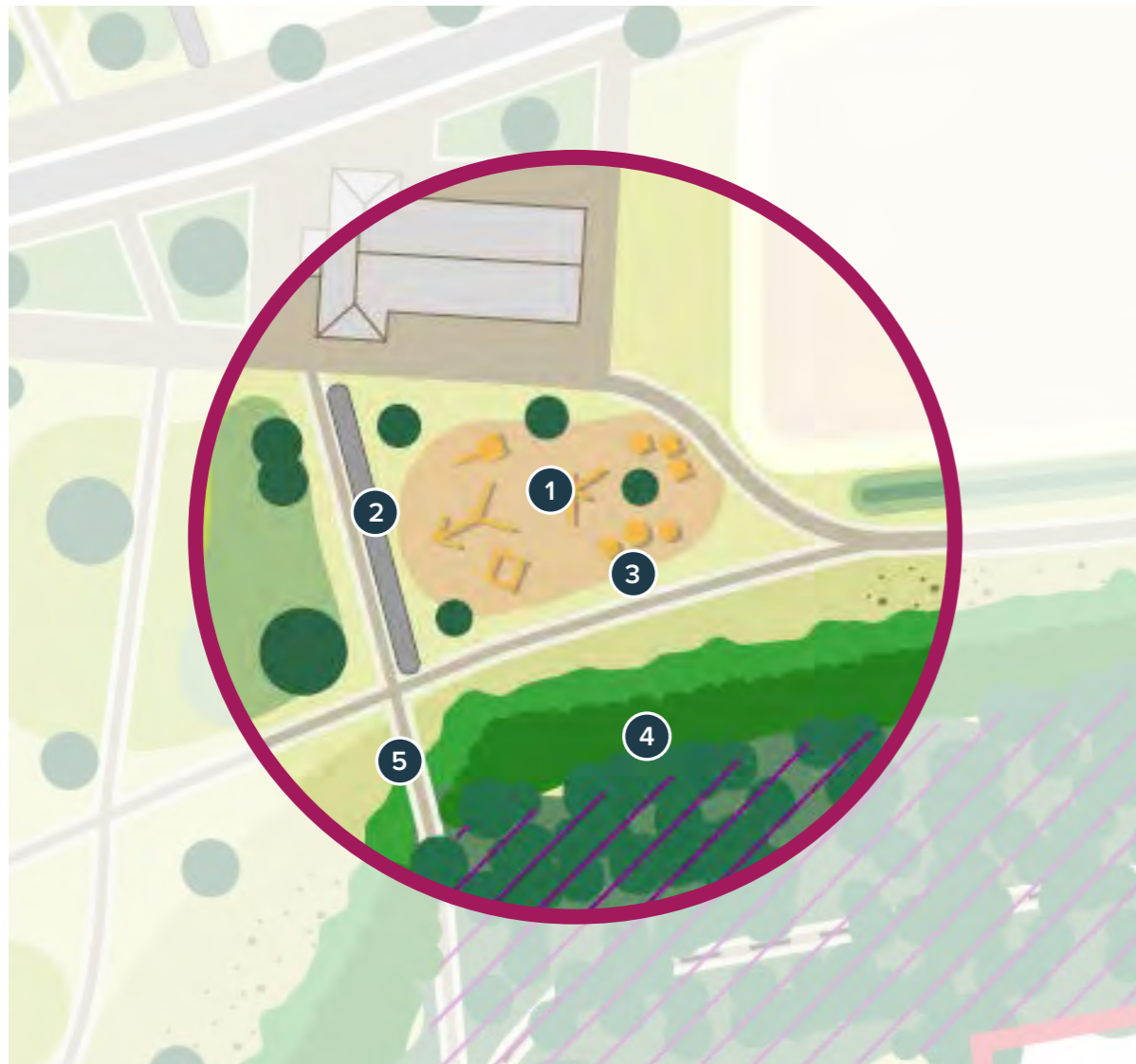
1. Cotswold stone walls to be retained, restored where necessary and integrated into the landscape setting, marking the threshold to the residential properties.
2. Proposed SuDS swale along the development to act a defensible edge, with wetland planting to provide amenity and biodiversity value.
3. A central parkland destination with spaces carved through a mix of gentle mounding, amenity planting, lawn and feature trees to provide space for gathering, socialising and play.
4. A wider central space allows structural feature trees to grow and provide vertical scale over time, forming an additional layer of softening and screening to the development.
5. Community garden opportunity with raised planters and adjacent amenities within neighbouring Village Hall.



Landscape Character Areas

PLAY AREA

1. Centrally located play area, providing an inclusive space for children of all ages overlooked by residential properties and Village Hall and located alongside key pedestrian and cycle routes.
2. Cotswold stone walls to be retained, restored where necessary and integrated into the landscape setting, providing a boundary between play and parkland.
3. Low mounds and grassland with some boundary planting create a natural setting for timber play equipment referencing the nearby woodland.
4. Existing retained woodland with proposed core and edge woodland to the south of the play area will provide an attractive backdrop to the play space and help soften and integrate into its landscape setting.
5. Good opportunities for wayfinding, addressing the arrival into a key community space.



Landscape Character Areas

SULIS GREEN

1. A usable and functional green space designed for picnicking, playing and space for larger community gatherings, all overlooked by the development parcel in the north with the woodland backdrop in the south.
2. Proposed meadow grassland wraps around the managed green, introducing new habitats and ecological value, while acting as a soft transition towards the woodland edge.
3. Additional woodland edge and woodland core planting along the existing southern woodland edge increases screening from the south as well as providing additional ecological benefits.



Landscape Character Areas

ALLOTMENTS

1. Provision for a community allotment shed with rainwater harvesting, raised planters, communal seating area with picnic benches providing an accessible space for the community to connect and grow.
2. Existing trees of value retained and new supplementary planting introduced to screen and buffer the boundary to the north and complement the threshold with Sulis Manor.
3. A mix of half, quarter-sized plots, and accessible raised beds, set back from the existing tree line to minimise over-shadowing, including watering and compost facilities.
4. Cotswold stone walling to form a characterful and secure perimeter.
5. Parking for cars and bicycles.



Landscape Character Areas

ORCHARD

1. Traditional orchard principles followed to create this colourful and fruitful boundary to the east, including fruiting trees, a wildflower meadow under storey and bulb planting to enhance biodiversity and provide all year round interest.
2. New pedestrian access into the development framed by orchard trees, providing an attractive gateway entrance from the existing PRow.
3. Cotswold stone walls and associated hedge bank to be retained, restored where necessary and integrated into the landscape setting.



Landscape Character Areas

EAST GATE MEADOW

1. Key pedestrian gateway at the intersection between proposed active travel shared cycle and footpath running east west, and PRoW running north south.
2. Opportunities for framed views, feature trees and wayfinding, marking the entrance to the development and signposting permissive routes around the development.
3. Cotswold stone walls and associated hedge bank to be retained, restored where necessary and integrated into the landscape setting, framing the active travel route and access point.
4. Large feature tree planting set within meadow grassland to provide vertical interest, soften views and break up built form.
5. SuDS basin with swathes of wetland planting and wildflower planting, with large fruit specimen trees, transitioning towards formal orchard space.



Landscape Sections

The following sections are illustrative and have been prepared to illustrate the design intent for some of the key green spaces.

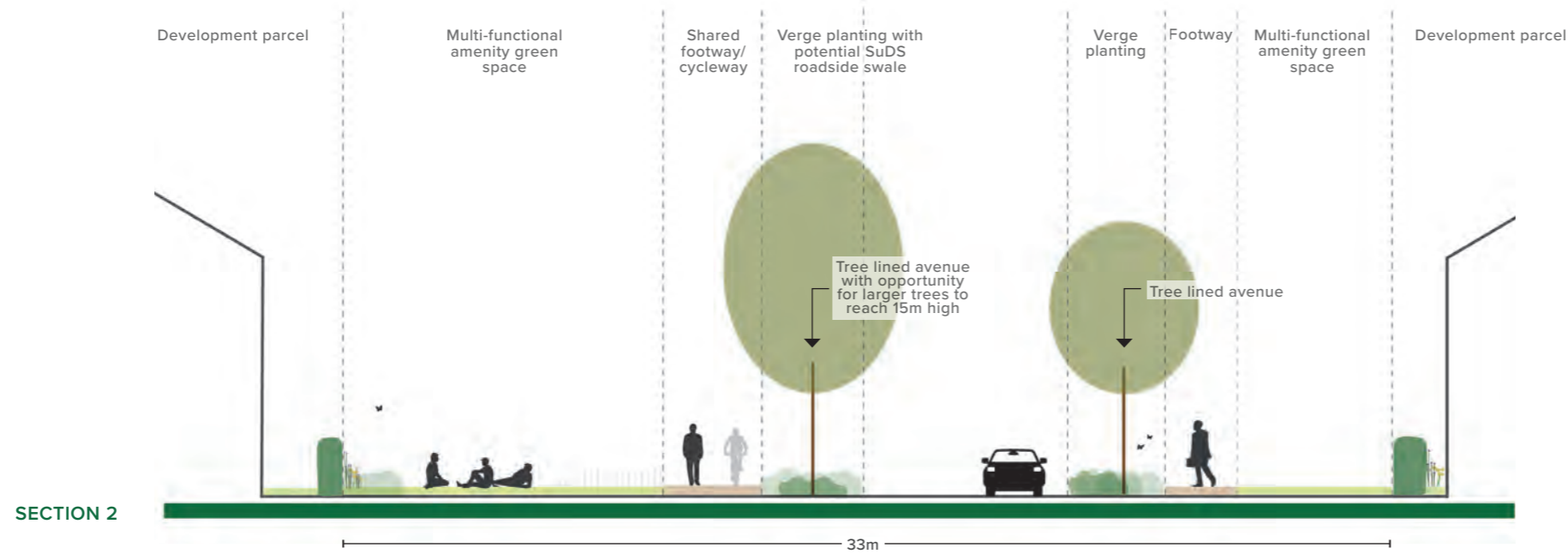
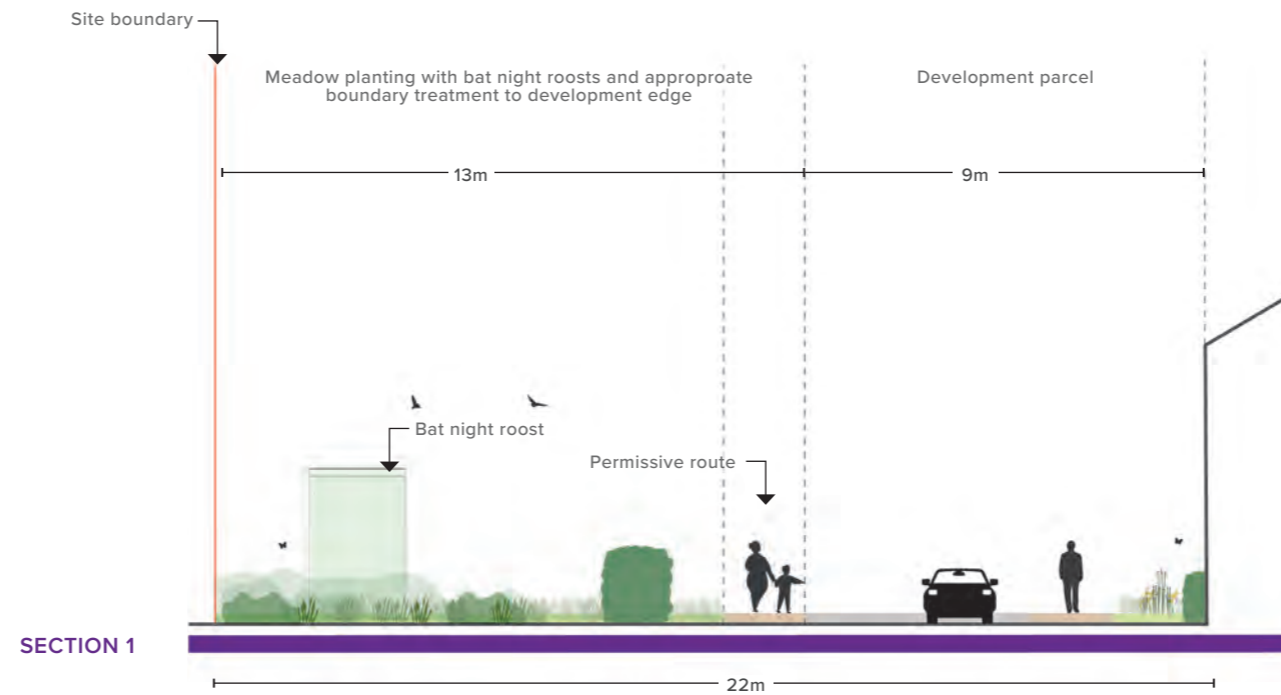
The sections provide more detail on the proposed interface between the existing landscape boundaries and the proposed Green Infrastructure and built form.

The sections have been developed as part of the iterative design process to test edge treatments, street widths and open space to enable parameters to be fixed, ensuring spaces are viable, usable and can achieve their desired function.

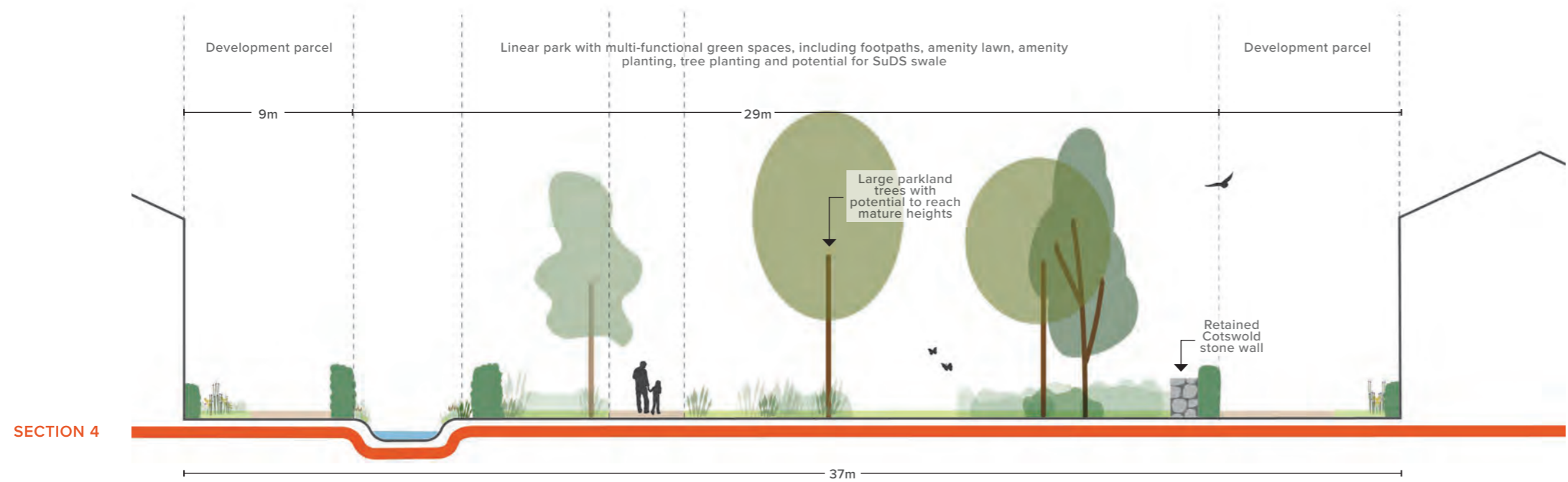
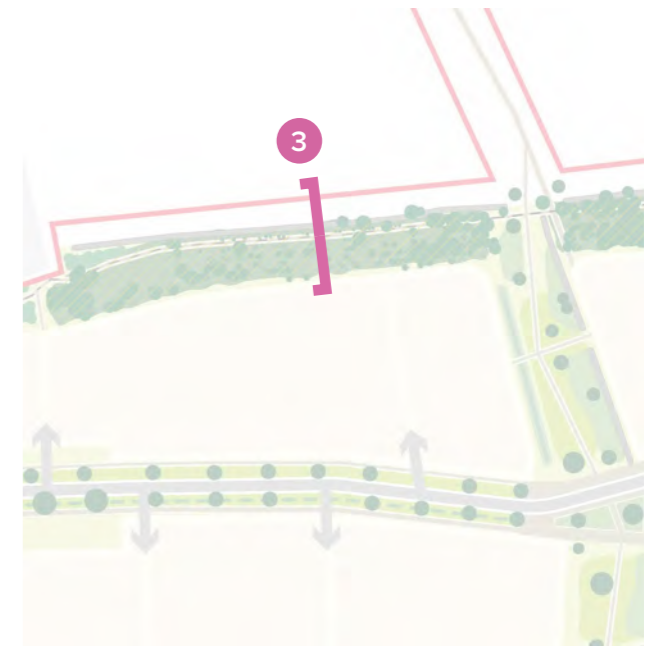
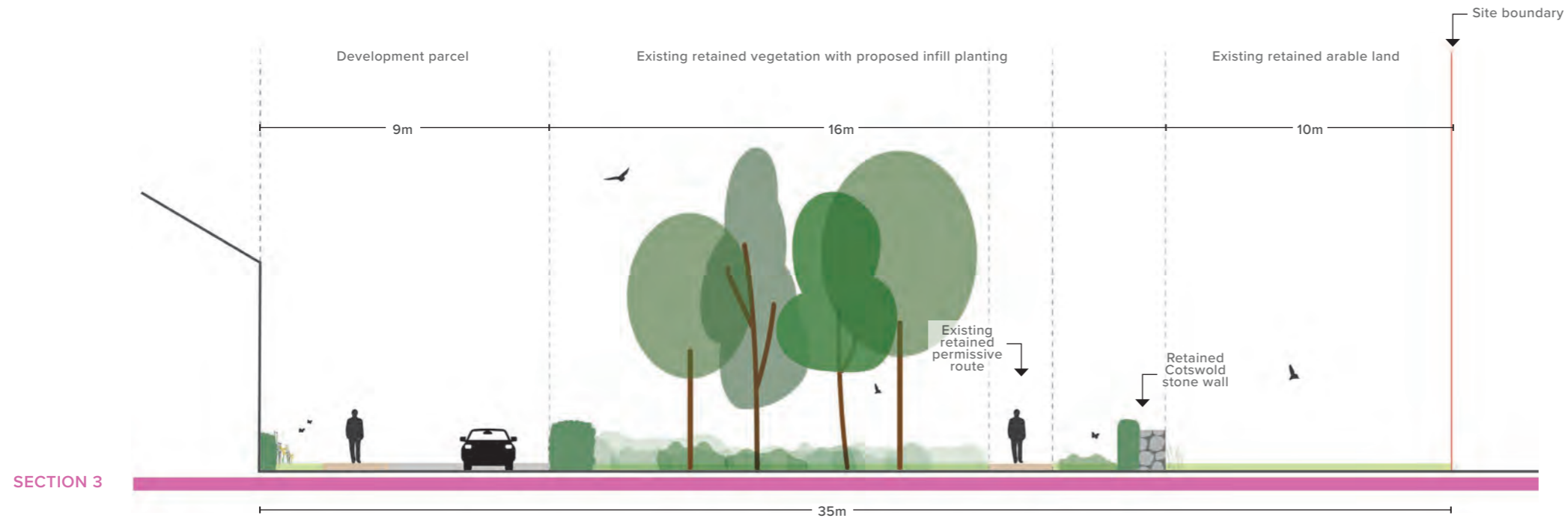
The detail of the landscape design will be developed further at the RMA stage.



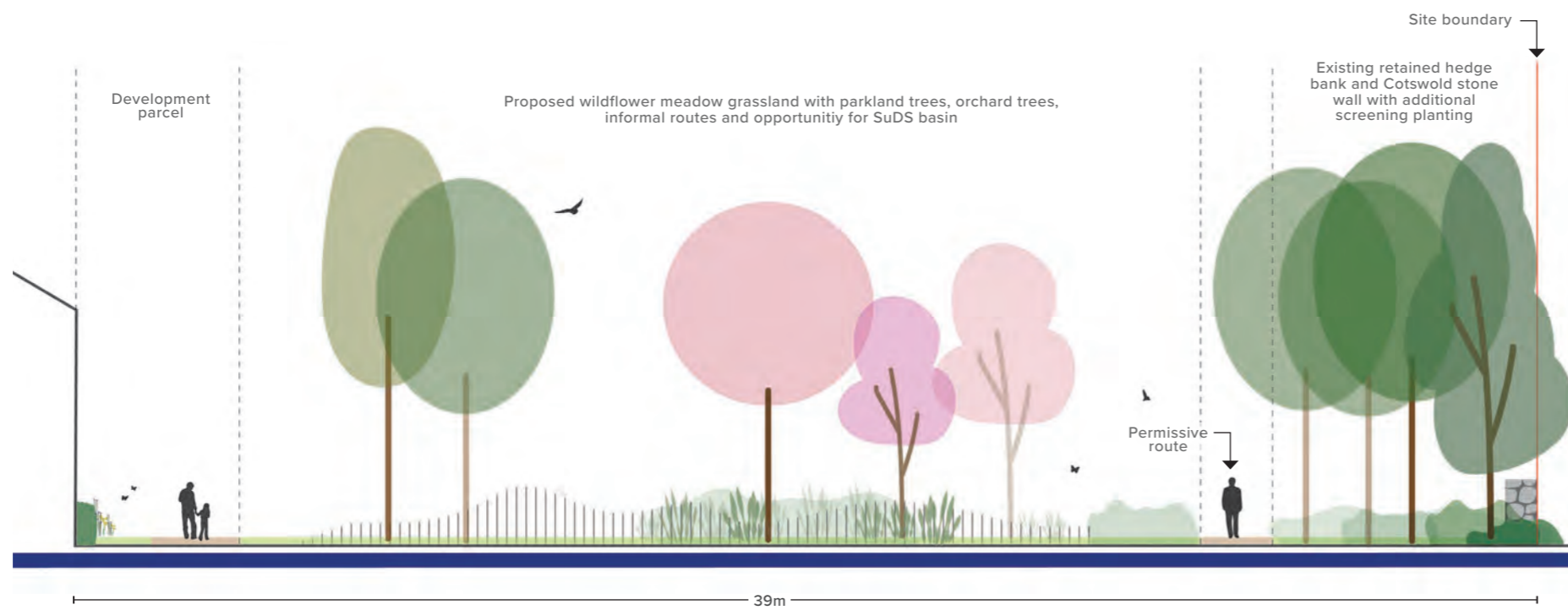
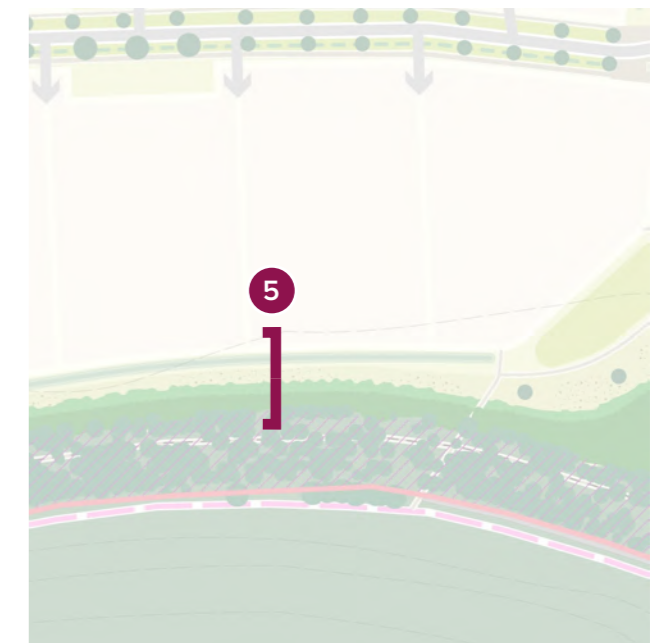
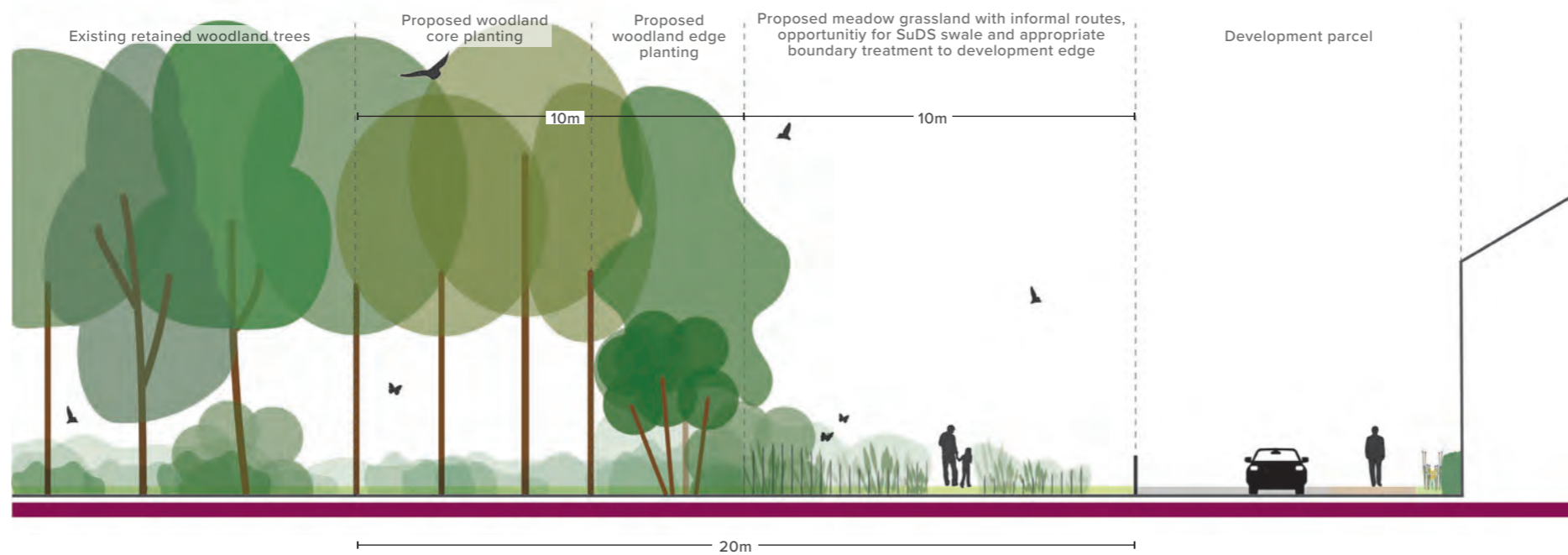
Landscape Sections



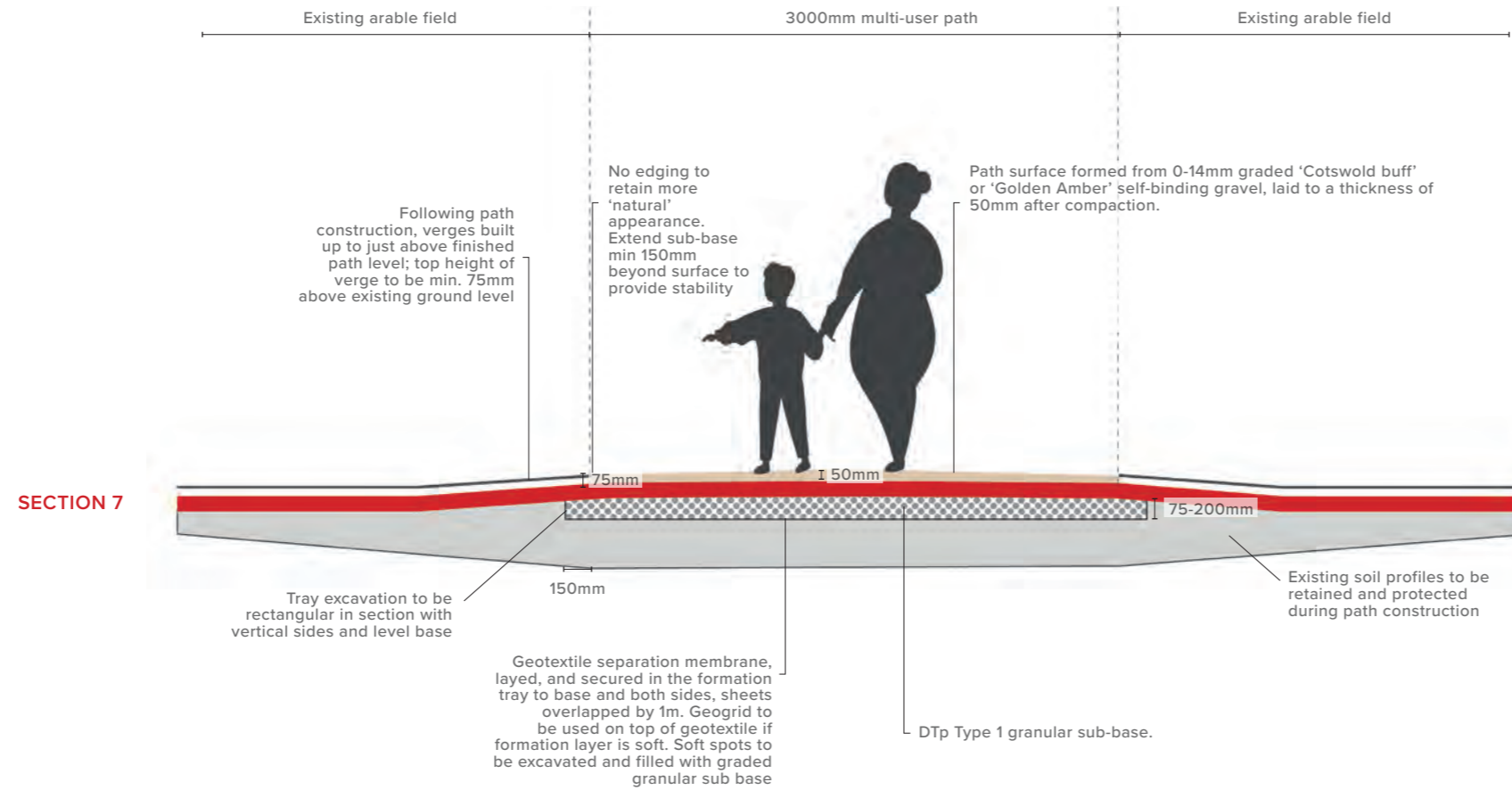
Landscape Sections



Landscape Sections



Landscape Sections



Biodiversity Strategy

Policy B3a sets out Placemaking Principles to protect and enhance wildlife. The ecological strategy aligns with these principles, providing effective mitigation for bats, skylarks, and reptiles, while retaining and enhancing key habitats around the site margins.

Detailed plans will protect key species during works, with operations under specialist licences where required. The overall aim is to enhance populations of bats, skylarks, and reptiles in and around Sulis Down.

1. Southern Tree Belt
Retained and widened to strengthen the horseshoe bat flyway. Around 2ha of additional woodland planting in 30 Acres to the south-east of the Site compensates for lost trees in Sulis Manor grounds and follows Council woodland planting guidance.
2. Dark Skies
Lighting designed to meet Environmental Zone E1 standards, with stricter controls along the Southern Tree Belt and near new bat roosts to protect light-sensitive horseshoe bats.
3. Bat Roosts
A new bat barn south of the site (already occupied in 2025) supports breeding horseshoe bats. Additional night roosts are proposed along the Sulis Manor boundary for horseshoe and other bat species.
4. Hedgerows and Walls
The boundary hedgerows will be retained, and derelict dry-stone walls restored to enhance landscape character and support small reptile populations.
5. Skylark Mitigation
Although only one pair of Skylarks bred north of the site in 2024, a quiet off-site compensation area in South Stoke Valley has been identified and will be managed with skylark plots to encourage breeding.



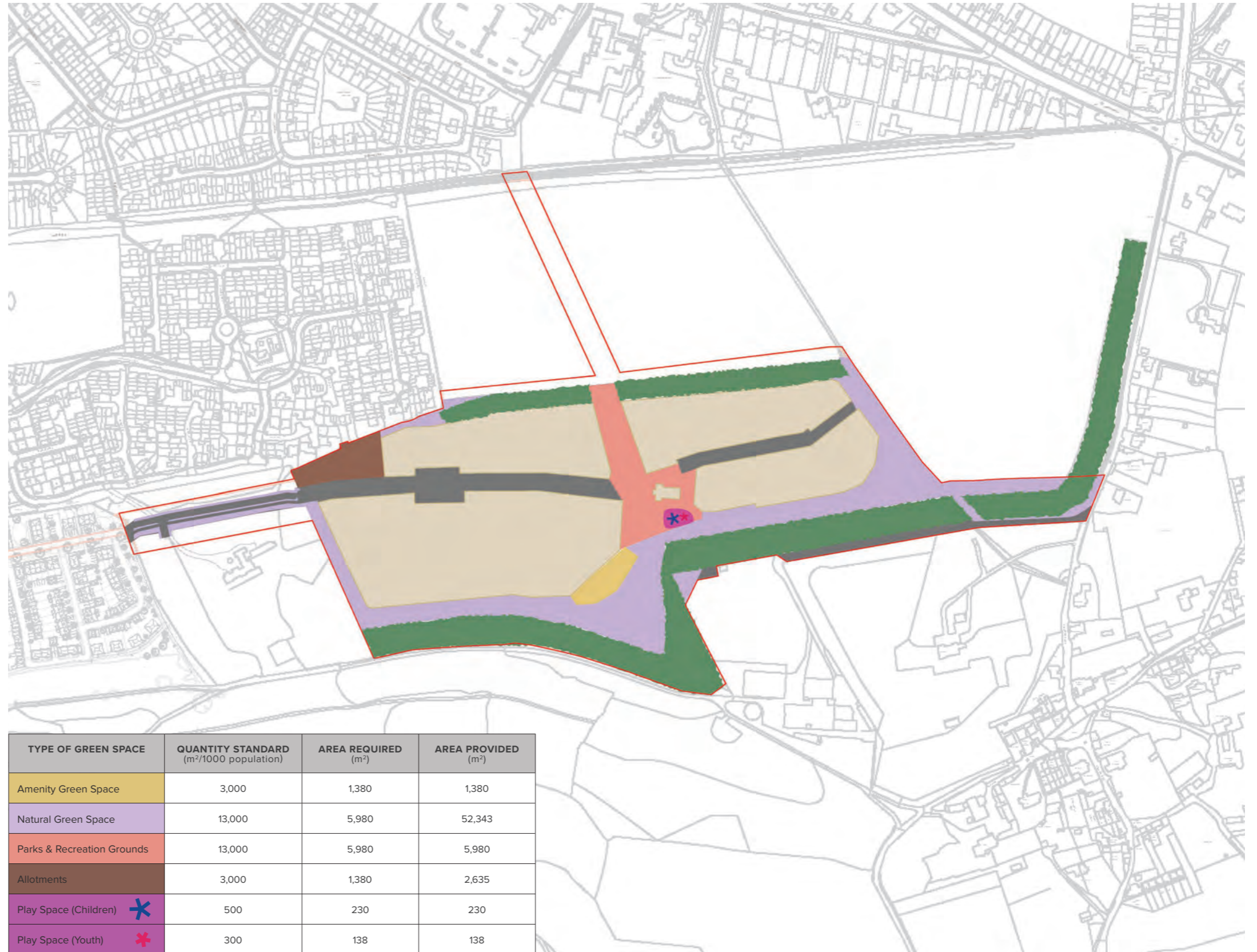
Open Space Strategy

The open space strategy has been designed to provide a connected and varied network of green spaces across the site, combining formal and informal recreation, play, productive landscape and naturalistic open space within a coherent Green Infrastructure framework.

In quantitative terms, the proposals meet the adopted B&NES quantity standards for children’s play space, youth play space, and parks and recreation and exceed the relevant standards for allotments and for amenity and natural green space.

The open space strategy is structured as a legible sequence of linked landscape spaces, offering a range of spaces for different ages and activities.

Open space provision has been designed to be policy compliant as well as contributing to the overall quality, usability and character of the development.



- Site Boundary
- Amenity Green Space
- Natural Greenspace
- Parks & Recreation Grounds
- Allotments
- * Play (children)
- * Play (youth)
- Existing Woodland
- Development Parcels
- Roads

Play Strategy

The play strategy for the Site is a key part of the wider landscape framework, providing opportunities for play, interaction and socialisation through a range of formal and informal experiences. A centrally located equipped play space is positioned within the main green corridor so that it forms part of the primary open space network, while play-on-the-way features are distributed along key pedestrian routes to ensure provision is accessible, well integrated and closely connected to homes.

The equipped play area provides co-located play for a range of ages within a single inclusive setting, allowing it to sit naturally within the surrounding green space rather than as a separate destination. Its location within the central corridor enables it to benefit from natural surveillance and from direct links to the wider sequence of open spaces.

Informal play is woven through the landscape by using changes in level, boulders, logs and other natural features to create incidental opportunities for exploration and activity, alongside smaller pocket parks within the development parcels.

- Site Boundary
- ⋯→ Pedestrian Routes
- - -> Pedestrian/cycle Routes
- ✱ Equipped Play (children)
- ✱ Informal Play (youth)
- ★ Informal Play on the Way



Productive Strategy

The productive landscape strategy forms part of the wider Green Infrastructure framework, embedding opportunities for growing, sharing and seasonal change within the masterplan.

A new community allotment provision is proposed to the south of Sulis Meadows within Phase 3, in a location intended to serve both Phases 3 and 4 and to provide a resource for the wider local community. The allotments will accommodate a range of plot sizes, alongside access, parking, secure cycle storage and watering facilities, with full details to be developed at Reserved Matters stage in consultation with B&NES.

This provision is complemented by space for a community garden within the central Village Green, creating opportunities for growing together, sharing seeds and produce, and supporting community interaction. Orchard planting and edible foraging hedgerow routes extend this productive landscape character through the site, combining food growing with biodiversity, seasonal interest and everyday use.

Together, these elements integrate productive landscape into the wider Green Infrastructure framework, supporting food growing, biodiversity and community use.



- Site Boundary
- Allotments
- Orchards
- Edible Hedgerows
- * Community Growing Area
- Pedestrian Routes
- Pedestrian/cycle Routes

Tree Planting Strategy

Overview

Tree planting will form a key part of the strategy for integrating built form into its immediate and wider landscape setting. It will help define the character and function of spaces, while contributing to a healthy and attractive living environment. Urban trees also provide wider environmental benefits, including microclimate regulation, improved water infiltration, biodiversity value and carbon storage. A diverse range of species, forms and scales will be specified to maximise climate resilience and reduce vulnerability to future climate-related pests and diseases.

Trees also offer multiple SuDS benefits and will be incorporated within SuDS features wherever practicable. New trees within hard landscaped areas will be designed with sufficient soil volumes to allow them to establish properly and reach maturity. At this stage, Phases 3 and 4 propose the use of bio-retention tree pits with structural soils. Structural soil is a stone-based growing medium capable of supporting pedestrian and vehicular loading, allowing tree pits to extend beneath hard surfacing and providing the soil volumes needed for healthy long-term growth. In these locations, rainwater collected from roofs, roads and paved surfaces can be directed into the tree pits, supporting tree establishment while contributing to wider stormwater management.

Across the wider site, new tree planting will also be used to strengthen habitat connectivity, with a broad species mix proposed to respond to a changing climate and improve resilience to future pest and disease pressures.

Existing Trees to be Retained

Where possible, existing trees of good health and longer-term value will be retained as an integral part of the landscape strategy. Trees of value along the northern boundary are to be retained and supplemented with native woodland planting, while the southern boundary will also receive additional planting to strengthen species diversity and resilience, and to allow existing trees to reach maturity over time.

Primary Street Trees

The east-west tree avenue will contribute over time to the wooded skyline seen within longer distance views from the north of Bath and from the Cotswold National Landscape within longer distance views from the south. The avenue is a continuation of the Phase 1 tree-lined avenue and as such the same tree species is proposed - *Carpinus betulus* (Hornbeam). This will be supplemented with feature trees that will add diversity and interest to the streetscene including: *Liquidambar styraciflua* (Sweet Gum).

Secondary Street Trees

Trees aligning streets will provide a strong landscape framework and setting for the new development and will contribute to defining different character areas within the development. Proposed street trees are to include: *Acer campestre* 'Streetwise' (Field Maple), *Acer x freemanii* 'Jeffersred' (Maple sp.), *Liquidambar styraciflua* (Sweet Gum), *Malus baccata* 'Street Parade' (Crab Apple), *Prunus* 'Sunset Boulevard' (Cherry), *Pyrus calleryana* 'Chanticleer' (Ornamental Pear), *Sorbus aucuparia* 'Sheerwater Seedling' (Rowan).

Open Space and Specimen Trees

Trees set within open space will assist with incorporating the development into the wider setting, while enhancing the visual amenity of the site, defining character areas, and providing waymarking. Proposed open space and specimen trees are to include: *Aesculus hippocastanum* 'Baumannii' (Horse Chestnut), *Betula nigra* (River Birch), *Cercidiphyllum japonicum* (Katsura), *Ginkgo biloba* (Maidenhair Tree), *Gleditsia triacanthos* 'Draves Street Keeper' (Honey Locust), *Morus nigra* (Mulberry), *Parrotia persica* 'Vanessa' (Persian Ironwood), *Prunus cerasifera* 'Nigra' (Purple Leaved Plum)

Woodland Replacement Planting

As part of the management strategy for the southern and northern woodland belts, and in common with Phase 1, certain areas subject to woodland thinning will be replanted with native species to enhance diversification. Proposed replacement trees are: *Acer campestre* (Field Maple), *Carpinus betulus* (Hornbeam), *Corylus avellana* (Hazel), *Pinus sylvestris* (Scots Pine), *Quercus robur* (English Oak), *Tilia cordata* (Small Leaved Lime).

Settlement Edges

Planting of native tree groups in informal lines, and groups within a generous greenway will filter views of the development from the north and east and create a soft, informal boundary that invites recreational use. Proposed tree group planting will consist of: *Acer campestre* (Field Maple), *Betula pendula* (Silver Birch), *Crataegus monogyna* (Hawthorn), *Ilex aquifolium* (Holly), *Malus sylvestris* (Crab Apple), *Prunus avium* (Wild Cherry), *Quercus robur* (English Oak), *Tilia cordata* (Small Leaved Lime).

NINE

Architectural Design

Architectural Precedents & Approach

An Arts and Crafts language is proposed for the design of the buildings, drawing on the architecture of nearby houses, such as Brantwood and Sulis Manor and more generally on the Arts & Crafts Cotswold tradition (and by extension the early 20th century Garden City movement). This design approach for Phases 3 & 4 is a continuation of the approach established for Phase 1.

Key elements of the Arts and Crafts language are:

- A clarity of form and structure with carefully composed roofs, gables and chimneys
- Soft landscaping, hedge and tree planting which are integral features of street scenes and to which architecture is designed to respond directly
- Relatively steeply pitched roofs, in a Cotswold stone tile material; this finish is dark and recessive, reducing longer-distance visual impact
- Materials will be traditional and utilised in a way that demonstrates craftsmanship. This palette of materials, which sit comfortably within an Arts and Crafts architectural language, is consistent with, and complementary to, the Cotswolds AONB
- New Sustainable Construction targets found in the Council's LPPU 2023 will introduce new design challenges to the Arts and Crafts Language, which will be addressed at the detailed design stage. None more so, than the requirement to deliver as much renewable energy as is possible on site, in this case by rooftop photovoltaics (Pvs).
- A high level assessment of the extent of the roof scape that might be available for Pvs for different Arts and Crafts building typologies has been undertaken.



Sulis Manor



Sulis Manor



A series of Arts and Crafts precedents that have inspired the architectural style

Architectural Design

Sitting within a rural-urban interface (both within the setting of the Bath World Heritage Site and within the Cotswold AONB), the architectural language utilised for Phase 1 and proposed for Phases 3 & 4 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.

In this way the site takes on the character of a settlement that is regularly planned and ordered, but draws architectural inspiration from local village vernacular.

Materials

Materials will be selected at the detailed design stage but the intention is that the palette will be traditional utilising a mix of extensive rubble stone with selected use of ashlar detailing. Render will also be used in a carefully selected palette of stone colours; roof tiles will be chosen in a dark, recessive colour.

Joinery Colour Palette

A colour palette for front doors and windows will use colour choices inspired by those traditionally used on Cotswold buildings.



Illustrative view of the community hall



Illustrative house types

Architectural Design



Illustrative aerial view of Phases 3 & 4

TEN

Sulis Manor Spine Road

Highway Design

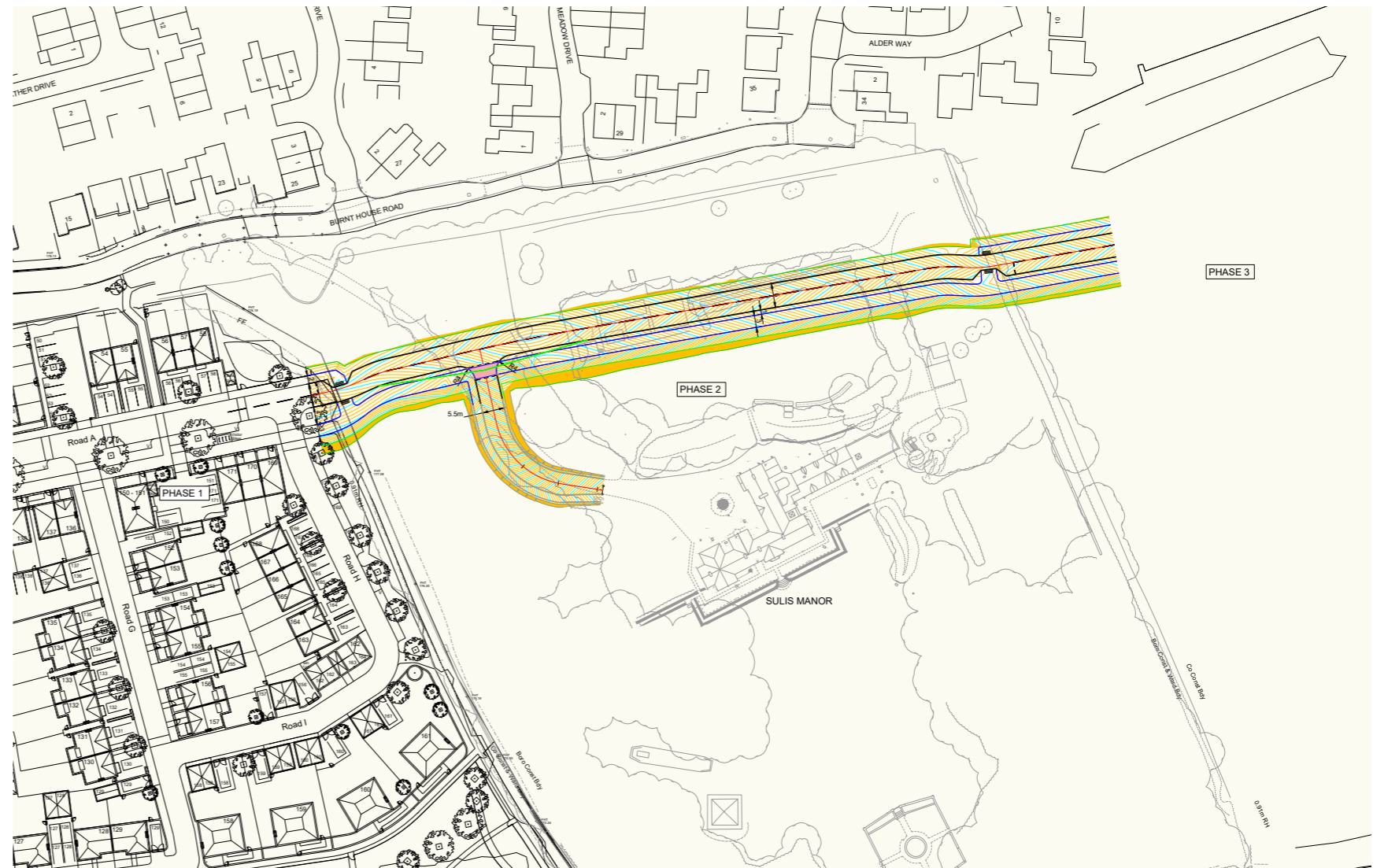
The Sulis Manor Spine Road will provide a link between Phase 1 and Phases 3 & 4 through Sulis Manor (Phase 2). The carriageway will be to adoptable standard and lit, similar to the spine road crossing Phase 1. A 3m wide pedestrian and cycle path is proposed on the south side of the carriageway. A new access shall be provided to Sulis Manor as part of the proposals.

Traffic calming is incorporated into the access strategy to regulate traffic speeds and encourage safe and considerate driving behaviour. This comprises narrowing the carriageway in two locations, in an alternating priority alignment. This is so vehicles stop and 'give way' in equal amounts, with traffic in both directions being regulated to driving slowly.

Surface treatments, kerbs and verges will be a continuation of the design approved for the Phase 1 spine road. Metal estate railings are proposed set 1m back from the roadway to the north and adjacent to the pedestrian and cycle path to the south.

A street lighting design has been prepared and submitted as part of the application.

Areas suitable for reinstatement planting of native woodland trees, shrubs and ground flora are to be identified following the removal of existing trees to accommodate the construction works. Details of all reinstatement planting are to be approved through planning condition.



Proposed Sulis Manor Spine Road Plan

Replacement Tree Planting Strategy

An arboricultural assessment of the impacts of the proposed highway route through Sulis Manor and the proposed development on trees within the north western boundary has been undertaken, and the proposed tree losses appraised against the B&NES Tree Replacement Strategy. The assessment identifies the need for up to 328 new trees to be planted to replace those potentially lost by the new highway and at least 154 new trees to be planted to replace those lost by the installation of allotments and development infrastructure.

An area for replacement tree planting for trees lost within Sulis Manor has been identified at 30 Acres, a field to the east of Phase 4. The location is on land controlled by the applicant and will strengthen bat foraging and flight links to Horsecombe Vale. It is situated on the plateau within 600-800m of Sulis Manor.

Replacement planting for trees lost from the northern boundary will be provided for within the proposed new woodland extension to the southern treebelt.

In addition to meeting the B&NES' Tree Replacement Strategy obligations, the proposals seek to offer landscape character and visual benefits, and ecological enhancements. The objective is to form a naturalistic native woodland structure with species selected to suit high and low tree canopy structure and complemented by new understorey shrubs and woodland ground flora.

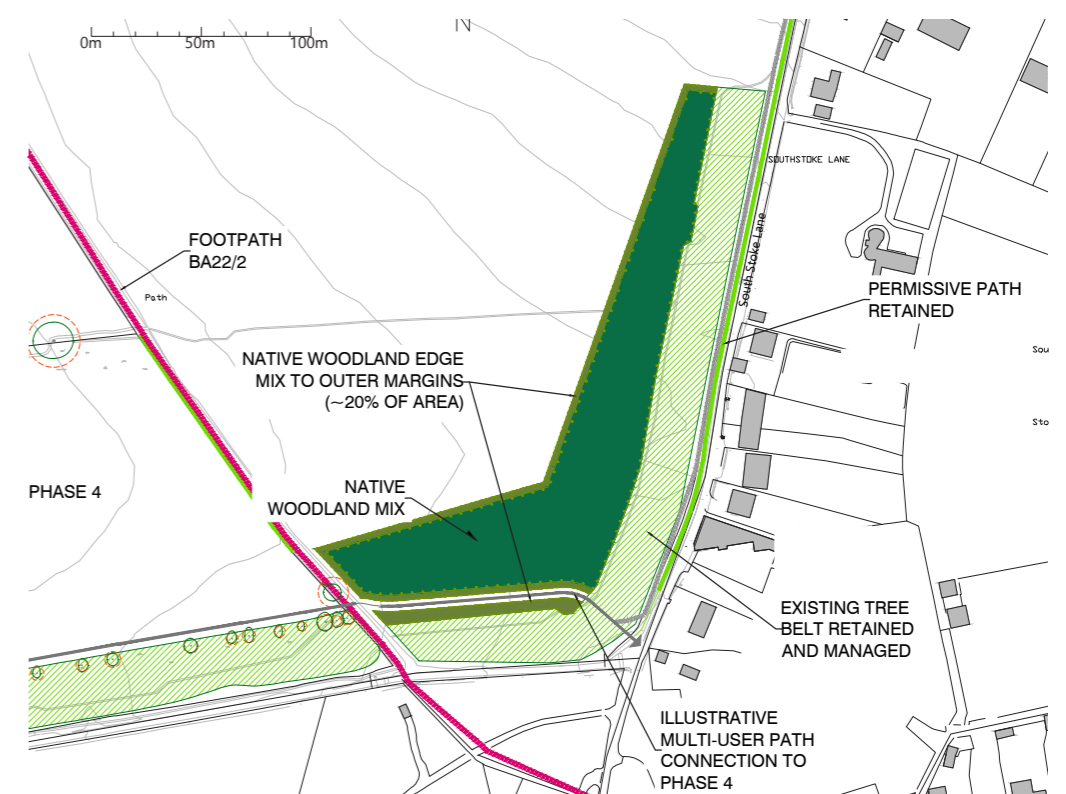
The proposed replacement trees will widen existing tree belts along the southern and eastern boundaries of 30 acres along the entire length of the southern boundary as it crosses Phase 3 & 4. It will include areas of new native woodland species, bounded by a distinct 'edge' mix comprising smaller species that will form approximately 20% of the overall target planting area. This will provide a natural transition and gradation to the retained field margins and proposed new recreational path. The new woodland planting area will be cultivated and seeded with a woodland ground flora seed mix prior to planting.

Overall, new native trees and shrubs will be planted at an average of 3.9m centres but positioned in an irregular layout to avoid rigid lines of trees. Within the native woodland and native woodland edge mixes, selected native species are identified to contribute to the dedicated tree replacement obligations relating to the Sulis Manor access road and the northern treebelt. This selected new tree stock will be planted at an average spacing of 6.75m within the overall woodland grid to provide sufficient space to allow their development to maturity. The selected native species will comprise:

- Acer campestre (Common Maple)
- Betula pendula (Silver Birch)
- Carpinus betulus (Hornbeam)
- Pinus sylvestris (Scots Pine)
- Prunus avium (Wild Cherry)
- Quercus robur (English Oak)
- Sorbus aucuparia (Rowan)
- Tilia cordata (Small-leaved Lime)

Full details of the layout of the planting are provided with this application including the LEMP. Please refer to drawing BMD.25.0123.DR.004 Replacement Tree Planting Strategy. The plan sets out the location for the proposed planting and principles of the design for both areas of replacement trees, demonstrating that the 328 replacement trees to 30 Acres and the 154 trees to the southern treebelt can be delivered. The replacement woodland planting area will be no less than 10,850m² at 30 Acres and 7,467m² to the southern treebelt.

Refer to the Arboricultural Impact Assessment and Tree Protection Plan for more information.



ELEVEN

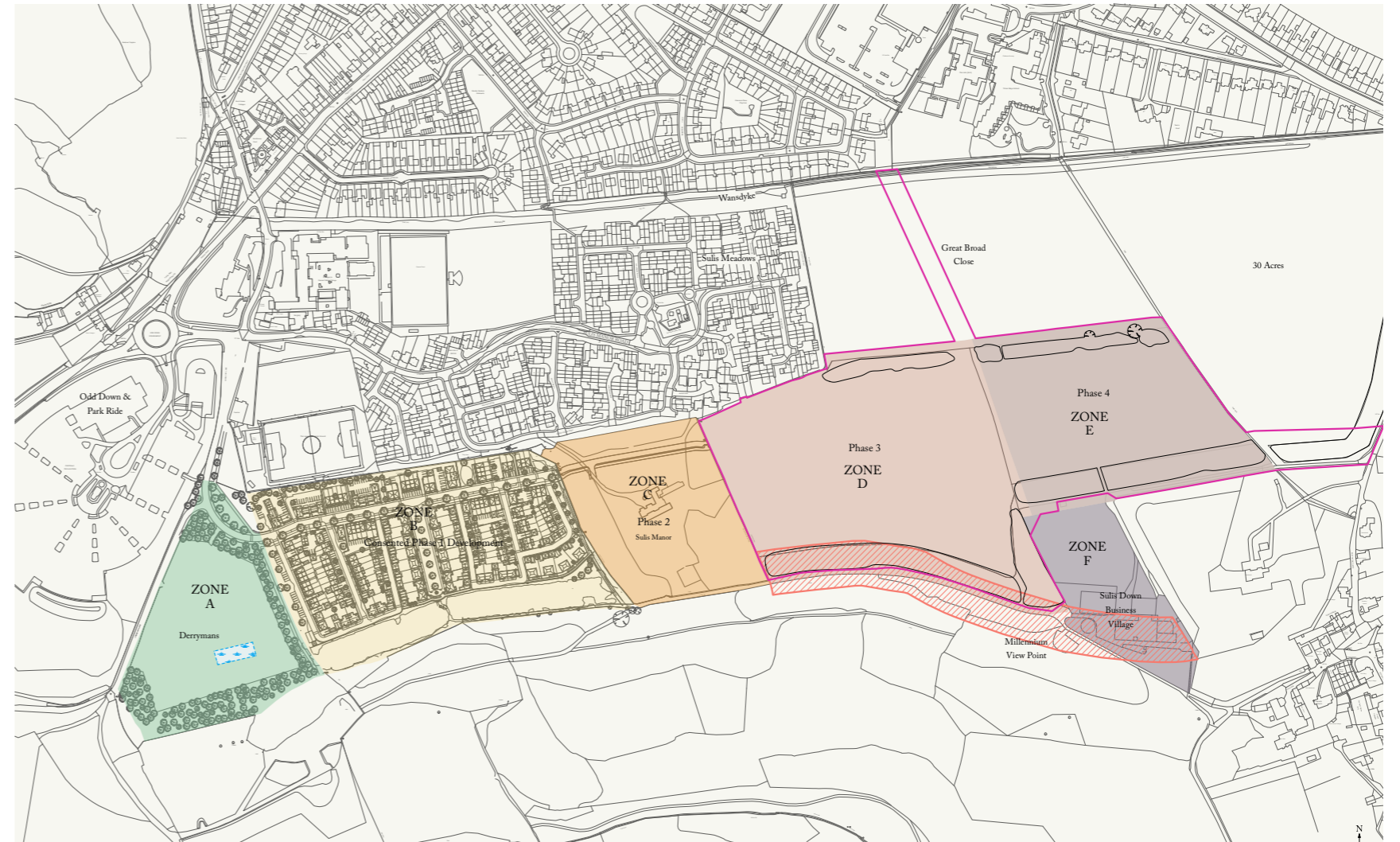
Services & Infrastructure

Flood Risk & Drainage

At Sulis Down, it is possible to deliver a development which fully complies with current planning guidance on flood risk, with opportunities presenting themselves to deliver a sustainable drainage regime as recommended by current planning guidance.

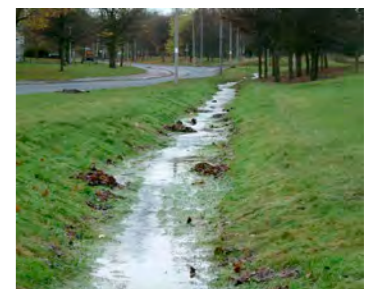
Sustainable Drainage Strategy (SuDS)

- The SuDS Strategy for Zone D and E will consist of infiltration features designed to intercept surface water at source, regulate flows and provide treatment for pollutants through each element.
- Features will be selected as appropriate depending on the location and available space, with elements to recover or re-use water, such as water butts and permeable paving for runoff from individual or shared drive areas or parking courts.
- The focus will be on splitting the attenuation into as many features as can practically be provided within each zone, to take advantage of the inherent suitability of the underlying ground conditions for infiltration and the Green Infrastructure. The space and depth required for infiltration will vary depending on the nature, size and location of each SuDS feature.
- In Zone D, SUDs attenuation or infiltration features are to be excluded from the 50 m slope stability zone.
- Highway Drainage for Zone C will be managed at source through the use of pot or lined soakaways in or adjacent to the roadway or similar SuDS features.



Key:

- Phases 3 & 4
- Zone A (Derrymans) pot Soakaways for adopted highways
- Zone B (Phase 1) Approved SUD's scheme including soakaway in Derrymans
- Zone C (Phase 2) Adopted highway to incorporate pot soakaway redevelopment of Sulis Manor to incorporate attenuation and infiltration as close to source as possible
- Zone D (Phase 3) SUD's scheme to incorporate attenuation and infiltration as close to source as possible
- Zone E (Phase 4) SUD's scheme to incorporate attenuation and infiltration as close to source as possible
- Zone F
- 50m slope stability zone. No planned attenuation or infiltration in this zone.
- Existing Phase 1 soakaway



Swale drainage features

Highway Design

Access to the site will be gained through an extension of the 'spine road' consented under Application 17/02588/EFUL. The carriageway will be 6m wide, which is appropriate to accommodate the safe and suitable movement of 2 large vehicles in both directions. Traffic calming is incorporated into the design, narrowing the carriageway width to approximately 3.75m in two sections, with two-way movements restricted for approximately 10m. This is to maintain low vehicle speeds, encourage safe and considerate driving behaviour. Assessments have confirmed that the arrangement is suitable for refuse, emergency and service vehicles. Sustainable travel links will be provided to connect to the footways and cycleways within Application 17/02588/EFUL and local area, enhancing the sustainable travel infrastructure of the south Odd Down area.

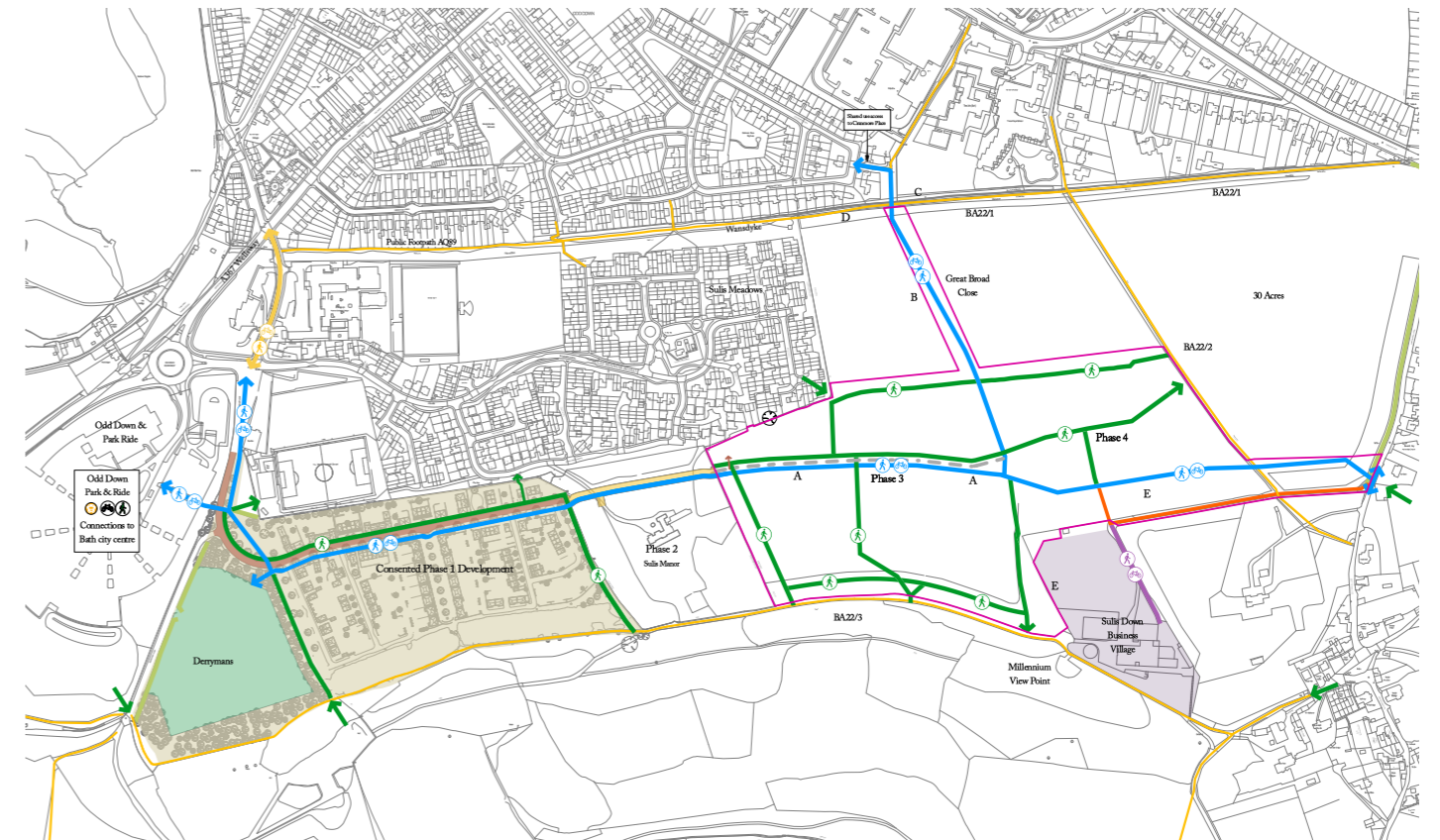
The hierarchy of the internal street network has been designed to the principles of Manual for Streets, and with consideration for the local streetscape of Bath. Vehicle, pedestrian and cycle routes will be designed to be visually direct, open and well used, with active frontage and appropriate access space for each home.

The internal road network will be conducive towards encouraging low vehicular speeds and considerate driving behaviour through a mix of street form, shared spaces and mews courts. This in turn will encourage the movement of pedestrians and cyclists.

The internal network will provide a policy compliant shared use cycle route, which will connect into the local cycle network. This will route east to west from Southstoke Lane, north of the southern tree belt, through the proposed central heart along the primary access/spine road to Combe Hay and Lane and North of the Central Heart across Great Broad Close and the Wansdyke. This will assist in the future development of the wider cycle network, as local cycle infrastructure is enhanced within Odd Down and southern Bath following future Bath and North East Somerset led improvement schemes.

Streets are designed to be conducive towards the movement of emergency, refuse and service vehicles, ensuring that the network will meet the needs of future residents. The site masterplan has been developed with high quality active travel provision, to ensure that walking and cycling are recognised as important travel modes.

Highway design has been prepared to accord to design policy. The internal arrangements are conducive towards encouraging active healthy travel habits and minimising environmental impacts, through ensuring that new site users are not reliant on car travel when accessing key facilities and employment opportunities.



Key:

- Primary Street
- Sulis Manor Access Road
- Proposed New Paths
- Shared Use Path
- Private Shared Use Plans (Sulis Down Business Village users only)
- Existing public Right of Way retained in current conditions unless otherwise stated
- Retained permissive path
- Emergency Access Route
- Pedestrian Access Routes
- Vehicular Access to Allotments

Refuse & Parking Strategy

Refuse

Refuse and recycling vehicles will access Phases 3 & 4, through an extension of the 'spine road' across Sulis Manor.

The road layout has been designed to ensure a network of streets that enable the easy circulation of refuse/recycling vehicles and the collection of waste. This is illustrated further in the refuse tracking drawings provided in the Transport Assessment, which evidences the suitability of internal roads to accommodate the larger vehicles up to 11.2m long.

The internal layout has been arranged so that refuse can be easily stored in gardens, bin stores or within the curtilage of each dwelling, with easy access provided to the public highway so that bins can be readily positioned for collection.

Communal bin stores are provided for apartments, located within communal courtyards or internally within buildings. This will avoid large areas of refuse storage cluttering the principal areas of public realm, but still allow easy access for collection.

Refuse provision, such as bin store size, collection routes and collection points will be agreed with Bath and Northeast Somerset Council as part of the application process.

Parking

Car parking will be provided in a combination of garages, curtilage spaces, off-street spaces and on-street spaces. The site is located close to public transport and cycle routes, providing alternative choices to travel by private car. An appropriate level of car parking will be provided in accordance with BaNES parking standards as described below.

- One bedroom dwellings will be provided with one space
- Two and three bedroom dwellings will be provided with a minimum of 2 spaces
- Four bedroom dwellings will be provided with a minimum of 3 spaces
- Five bedroom dwellings will be provided with 4 spaces
- Where provided garages will be sized to be 6m x 3m internally
- In addition all flats will be provided with one covered cycle space in communal stores



Phase 1 plan extract showing parking strategy

Key:

	Covered Allocated Parking
	Allocated Parking
	Visitor Parking
	Communal Bike Stores
	Visitor Bike Racks

Street Lighting Strategy

The street lighting strategy is summarised below:

Luminaire Type and Light Source

The street lighting will be designed in accordance with industry standards, guidance and recommendations in order to provide an adequate level of illuminance for security, safety and amenity throughout the site, whilst balancing the need to limit obtrusive light, over-lighting, energy consumption and impacts on the environment and ecological receptors.

There is an intention to reduce the amount of lit roads within the site, acknowledging the AONB setting and Policies CE5 and CE10 which highlight the potential impact of lit minor roads, and the need to minimise light pollution. The proposed lighting strategy will aim to minimise upward light output from external luminaires in accordance with the guidance for an E1 zone, and to limit light spill outside of areas being lit. To further reduce the lighting impacts, by addressing the amount of lighting proposed, and thus reflected light, it is intended that the subsidiary roads proposed within the site will be graded, for example designating primary (spine roads), secondary, and tertiary roads. With tertiary roads with the lowest traffic use and risks to be un-lit. Refer to Lighting Impact Assessment report.

The luminaires that will be selected for the section 38 street lighting, where required, throughout the development and to the site access will be LED luminaires, as specified by BaNES.

The street lights will be post top mounted on 5m columns, which is the minimum column height that BaNES will accept. The columns and luminaire canopies will be black in colour.

The street lighting luminaires will be downward directional, mounted in the horizontal position, parallel to the ground with a zero-degree tilt. They will have good light control and cut off angles to reduce light spill, control glare and limit sky glow. The luminaires selected will have a warm white colour temperature (approx. 3000K). The specified luminaires for the street lighting all have a 0% Upward Light Output Ratio (ULOR), in order to comply with the requirements of Environmental Lighting Zone E1.

A street lighting strategy has been prepared for the spine road through Sulis Manor and is included as part of the application.

Control Strategy

All street lighting luminaires will utilise dimming control to allow dimming to BaNES Dimming profiles. This will be facilitated by the CMS (Central Management System) meaning that each luminaire is individually addressed and can be controlled and dimmed remotely.

The street lighting within the residential areas will utilise BaNES's Residential dimming profile and be set at 100% output between dusk and 22:00, 50% output between 22:00 and 23:00, 10% output between 23:00 and 6:00, 50% output between 6:00 and 7:00 and 100% output between 07:00 and dawn.

Construction Lighting

Construction lighting will be effectively managed through a Construction Environmental Management Plan (CEMP).



Illustrative image of Phase 1 showing street lighting incorporated into the street scene



Proposed street lighting design for spine road through Sulis Manor

Sustainability Strategy

B&NES Council have recently adopted new, far reaching energy construction policies in response to the Climate Emergency, as part of the Local Plan Partial Update January 2023 (LPPU). In respect of major residential development, the relevant energy and carbon targets are set out in Policy SCR6:

Policy SCR6 New build residential development will aim to achieve zero operational emissions by reducing heat and power demand then supplying all energy through onsite renewables. Through the submission of an appropriate energy assessment, having regard to the Sustainable Construction Checklist SPD, proposed new residential development will demonstrate the following:

- Space heating demand less than 30 kWh/m²/annum
- Total energy use less than 40 kWh/m²/annum
- On site renewable energy generation to match the total energy use, with a preference for roof mounted solar PV
- Connection to a low- or zero-carbon district heating network where available

Major residential development

In the case of major developments where the use of on site renewables to match total energy consumption is demonstrated to not be technically feasible (for example with apartments) or economically viable, renewable energy generation should be maximised and the residual on site renewable energy generation (calculated as the equivalent carbon emissions) must be offset by a financial contribution paid into the Council's carbon offset fund where the legal tests set out in the Community Infrastructure Regulations are met."

Phase 1 of Sulis Down, which is currently under construction, is delivering the Council's previous energy performance requirements as set out in Policy CP 2 and SCR 1 (now superseded) and Part L 2013 Building Regulations. Policy set a target to provide sufficient renewable energy generation to reduce carbon emissions from anticipated (regulated) energy use by at least 10%.

Going forward, the new target for Phases 3 & 4 is on-site renewables sufficient to meet 100% of regulated and unregulated energy use, where technically feasible or economically viable. Roof-top photovoltaics will be a key driver in meeting this target.

Achieving the Space Heating Threshold

The design would minimise thermal bridges through high-quality insulation, efficient glazing, and an airtight thermal envelope. MVHR would be installed to reduce heat loss. Key principles include:

- Airtight construction with a strong thermal envelope
- Efficient building form with low heat-loss surfaces
- Low-U-value glazing sized and positioned for performance
- Good ventilation and fresh air provision
- Building orientation optimised for shading and overheating prevention

Achieving the Total Energy Use Threshold

On-site renewable energy design would focus on:

- Maximising suitable roof area, especially south-facing or dual-aspect east/west roofs for solar panels
- Protecting panels from wind damage (e.g., small parapets on flat roofs)
- Designing roofs for future installation where immediate installation isn't possible
- The development would target renewable generation of 120 kWh/m² of roof space.

Achieving the Upfront Embodied Carbon Threshold

Embodied carbon would be assessed using the RICS Whole Life Carbon methodology. Material efficiency would guide the design, including:

- Optimising structural spans and avoiding over-specification
- Using modular dimensions to reduce waste
- Considering low-carbon structural options such as timber or hybrid systems
- Selecting materials with EPDs and favouring low-carbon choices (responsibly sourced timber, recycled steel, low-cement concrete mixes)
- Using GGBS, PFA, or similar additives to reduce cement content
- Prioritising local sourcing, low-carbon manufacturers, and low-impact construction methods
- Contractors would be required to report construction-phase carbon to support monitoring and improvement.

Climate Change & Sustainability

Design Considerations

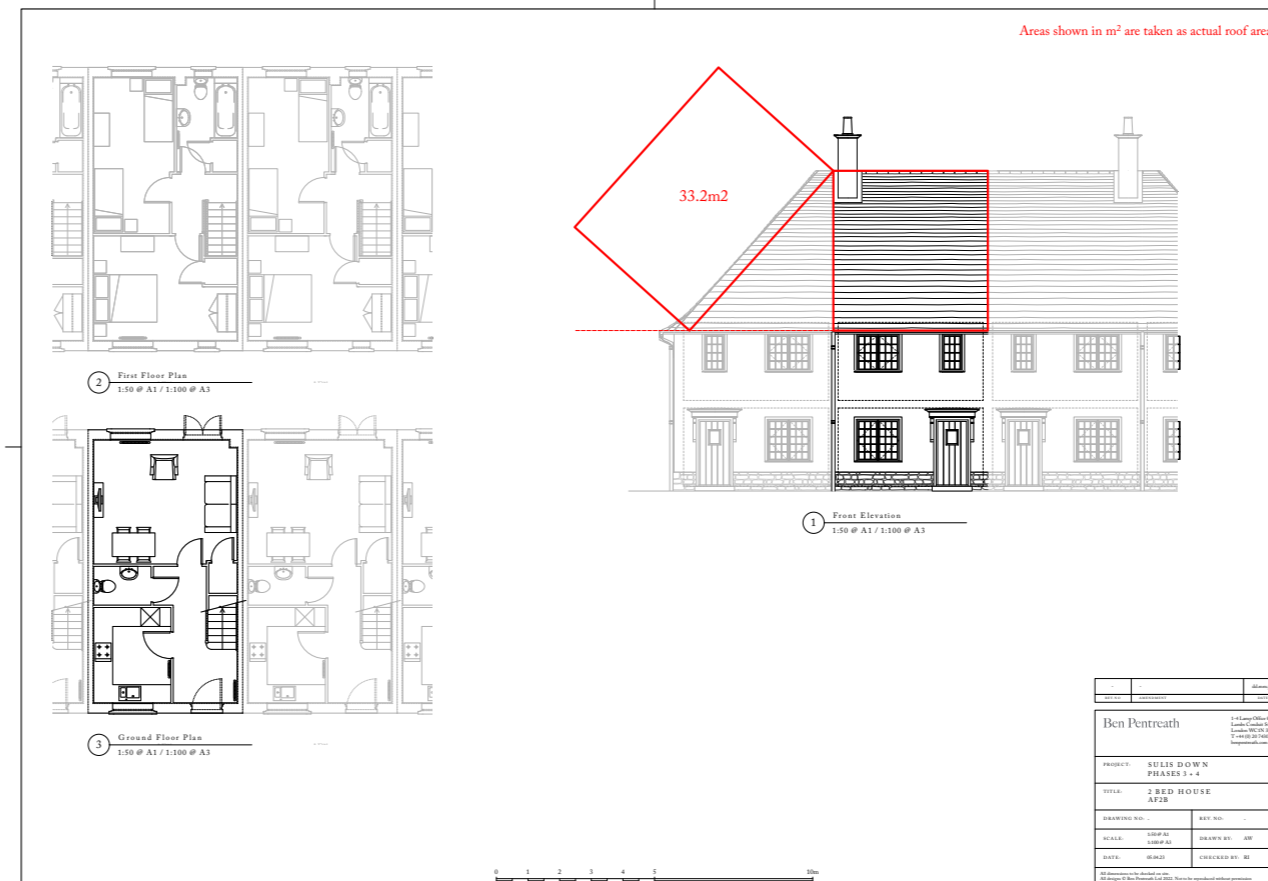
Incorporation of PV panels or tiles as part of the design proposals shall be reviewed and considered further during the detailed design phase.

The layout and orientation of houses and garages should look to maximise the potential for PV panels or tiles by providing a higher proportion of east, south and west facing roofs.

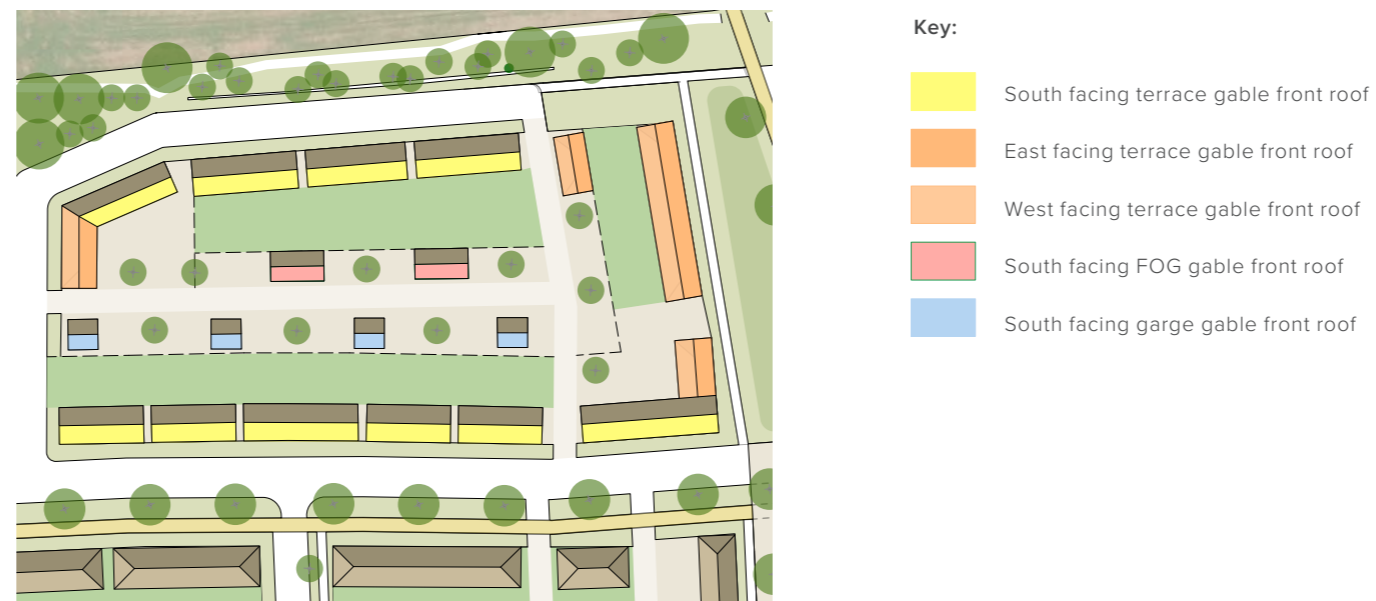
During the detailed design stage careful consideration will be required regarding the provision of PV panels or tiles and their prominence on principal street scenes. The proposed Arts and Crafts language is characterised by steeply pitched roofs and the use of gables. The style, pitch and design of the roofs shall consider both the architectural design intent and the energy generation requirements as the detailed design proposals are worked up.

The choice of roof material and PV panels or tiles shall also be an important consideration. They should be of a similar colour so that the PV panels are not too prominent, will include the use of non-reflective materials and will be carefully integrated into the design of the dwellings, garages or other buildings.

According to policy SCR6, any residual carbon emissions can be made up through offset payments providing it is not viable to achieve the reduction through other reasonable methods. In this high level assessment, it has been shown that the house types and roofscape have the overall capacity to achieve net zero carbon emissions and that a site wide scheme appears technically feasible at this early, outline stage. Therefore the offset approach is not required.



Sample house type where the roof capacity for Pvs has been assessed



Conclusion

A Landscape Led Approach

The proposals have been shaped through a landscape-led approach that places the Site’s natural assets, ecological networks, heritage context, and visual sensitivities at the heart of the design process.

National Planning Policy Framework (NPPF)

Changes in the National Planning Policy Framework published in December 2024 have also been considered, in particular, how development can contribute to the purpose of the National Landscape. Proposals strengthen key landscape features and improve access and connectivity to

Core Strategy and LLPU

The B&NES Core Strategy and LLPU has been considered at every step of the masterplanning process. This has ensured the emerging masterplan reflects the Placemaking Principles within the strategic allocation B3a Policy and reflects the greater weight given to the conservation, enhancement and management of the landscape and scenic beauty of National Landscapes.

Landscape Character Assessments

Landscape character assessment of the surrounding Cam and Wellow Valley and the Sulis Plateau itself have helped shape the proposed landscape and biodiversity strategy. Retaining openness, extending woodland and introducing new habitat and grassland.

B&NES Green Infrastructure Strategy

Proposals respect and enhance the existing green infrastructure, improves access to green space and opportunity for food production and protects and enhances ecological networks.

Appeal decision and Inspector’s Comments

Inspector’s comments from the appeal decision have also been a key driver in shaping the proposals.

- 1 Maintain visual separation from South Stoke and protect rural plateau character
- Development has moved away from the south east corner of the site, reducing the perceived proximity between South Stoke and the Site for pedestrians using local footpaths
- 2 Strengthen and extend woodland belts to screen built form and enhance biodiversity
- The southern woodland belt has been strengthened and extended to create a better transition between built form and the woodland edge
- 3 Avoid intrusive massing at sensitive edges; keep heights low
- Heights have been lowered across the development, with no more than 2.5 storeys proposed and only at key locations
- 4 Protect and frame key views from PRoWs, Wansdyke, and WHS setting
- Development iterations have been tested in both long distance and close up views as part of the design process to ensure views are protected and to aid placemaking
- 5 Safeguard Sulis Manor’s setting with generous green buffers
- A generous buffer with Sulis Manor has been retained with a new gateway proposed to the west of the Site at the interface with Sulis Manor

“VISION: to create a landscape-led neighbourhood that strengthens the green edge of Bath, respects the skyline of the Sulis Manor plateau, protects the rural setting of South Stoke and the heritage setting of Sulis Manor, and delivers connected, biodiverse spaces that promote health and community engagement.”

Conclusion

“*The emerging masterplan creates a distinctive, policy-compliant scheme that conserves and positively enhances the Cotswolds National Landscape and the World Heritage Site. The result is a framework for a vibrant, connected new neighbourhood that integrates with its setting, delivers environmental gain, and contributes positively in the long term to the landscape character and sense of place.*”

Key Benefits

**5+HA OF GI
REPRESENTING
A 20%
INCREASE ON
PREVIOUS
SCHEME**

**INCREASE IN
WOODLAND
AND
CONNECTED
HABITAT**

**HEIGHTS
TESTED AND
LOWERED
TO REDUCE
VISUAL
IMPACT**

**NEW
ALLOTMENTS
AND
FORAGING
NETWORKS**

**C.200 HOMES
INCLUDING
AFFORDABLE
HOMES**

**SETTING OF
SULIS MANOR
AND LOCAL
HERITAGE
ASSETS
INTEGRATED**

**LONG-TERM
STEWARDSHIP
SECURED
THROUGH
LEMP**

**COMMUNITY
VILLAGE
HALL AND
PLAYSPACES**

THIRTEEN

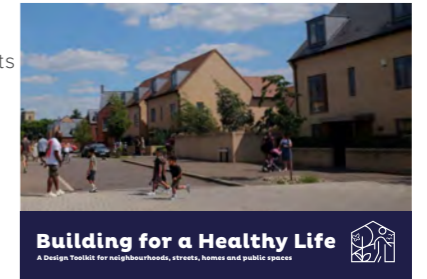
Appendix

Building for a Healthy Life

Building for a Healthy Life is a government-endorsed industry standard for well designed homes and neighbourhoods. It is based on 12 questions designed to assess the quality of proposed and completed developments. A 'traffic light' system is used to score developments with 9 'greens' required to achieve 'Built for Life' accreditation.

As part of the planning pre-application process Phases 3 & 4 have been assessed using 'Building for a Healthy Life'.

Phases 3 & 4 Site Plan achieve 12 'greens', the analysis and assessment of which is detailed below.

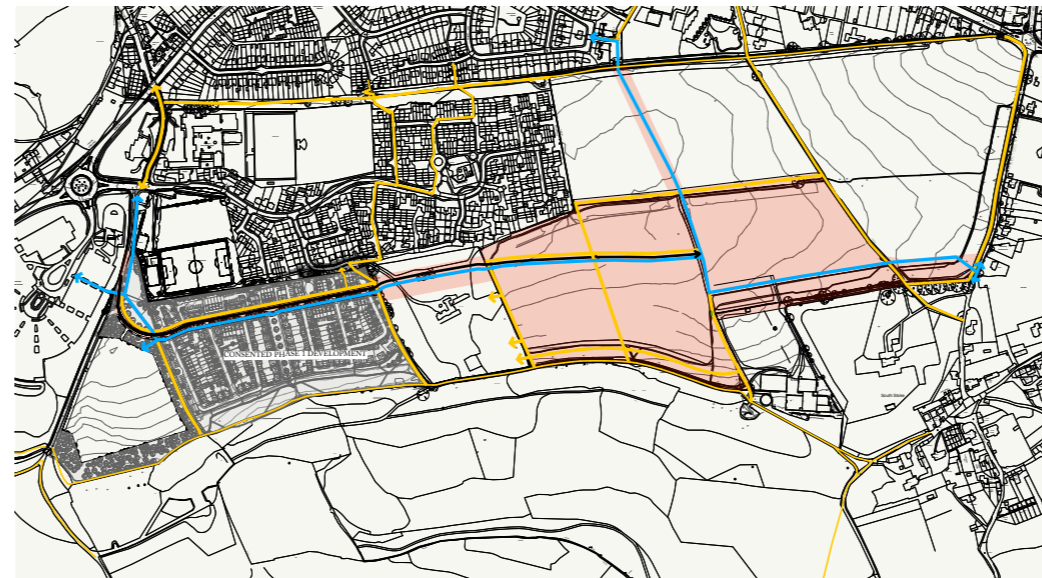


Building for a Healthy Life Assessment

1. Natural Connections

Does the scheme integrate into its surroundings by reinforcing existing connections and creating new ones, while also respecting existing buildings and land uses around the development site?

- Link through Phase 1 to new vehicular access of Combe Hay Lane connecting to Odd Down Roundabout
- Pedestrian link into Sulis Meadows via Phase 1
- Pedestrian link to the Wansdyke and Odd Down beyond
- Retention and enhancement of existing Footpaths and Permissive paths within the site
- Pedestrian and cycle link to Park and Ride to the west and South Stoke Lane to the east
- Linkages are proposed north to the Wansdyke that can connect into the Walk Ride Bath Scholar's Way proposed route, encouraging wider connectivity across the City
- All movement routes on the proposed masterplan have been designed to be overlooked by residential properties



Plan showing wider site connections

key:

- Phases 3 & 4 Application Site
- Pedestrian Linkage
- Proposed Shared Use Routes
- Vehicular Access



2. Walking, cycling and public transport

Does the scheme have good access to public transport to help reduce car dependency?

- Park and Ride is a short walk from the site
- Masterplan designed to be a permeable layout facilitating access for all residents to the Park and Ride site



Odd Down Park & Ride



Building for a Healthy Life



400m walkable neighbourhood to local services

key:



5 minute walk zone from the centre

3 . Facilities and services

Does the development provide (or is it close to) community facilities, such as shops, schools, workplaces, parks, play areas, pubs or cafes?

- Play area to be provided on site and formal green space to be provided
- St Martin's Garden Primary School located a short walk from the site (approx. 800m- falls between desirable and acceptable in suggested acceptable walking distances table)
- Sainsburys food store located a short walk from the site (approx. 800m)
- Retention and enhancement proposed of existing pedestrian link into Sulis Meadows and Odd Down. Route links through to School and shop as above
- Connection to Bath City Centre via Park and Ride located adjacent to the site
- There is a doctors surgery in Odd Down
- New community hall provided in Phases 3 & 4



Tenure blind design of street scenes

4. Homes for everyone

Does the development have a mix of housing types and tenures that suit local requirements?

- A mix of 1 bed to 5 bed properties will be proposed for Phases 3 & 4
- These shall be in a range of types including flats, coach houses and houses
- Affordable housing will be provided to meet BaNES requirements
- Affordable housing will be evenly distributed across the site and not contained in one area
- Housing will be designed to be tenure blind. This will be brought forward in the detailed elevation package

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CREATING A PLACE

5. Making the most of what's there

Does the scheme take advantage of existing topography, landscape features (including water courses), wildlife habitats, existing buildings, site orientation and microclimates?

- The site is an enclosed, gently sloping rectilinear field
- Of primary concern is the restriction of views into the site from the rolling AONB landscape to the South, careful consideration shall be given to the proposed roofscape and integration of new tree planting into the masterplan design
- Existing features within the site such as the Southern Tree Belt and Cotswold stone walls will be retained and enhanced
- Drainage and rainwater design to be considered further and integrating into the masterplan design
- Existing and proposed Wildlife habitats to be considered as part of the comprehensive ecology strategy and integrated into the masterplan design



The southern tree belt



6. A memorable character

Does the scheme create a place with a locally inspired or otherwise distinctive character?

- The Masterplan shall adopt a planned settlement approach to reflect a single coherent development
- An Arts and Crafts language is proposed, drawing locally on the architecture of Sulis Manor and several neighbouring houses on Midford Road, and more generally on the Arts & Crafts Cotswold tradition (and by extension the early 20th century Garden City movement)
- The use of repeated architectural types, ornamental details and motifs shall be developed as part of an identifiable architectural language for the site
- Soft landscaping, hedge and tree planting shall be integral features of the street scenes and the architecture designed to respond directly to this



Arts and Crafts language developed for the architecture, informed by the character of Sulis Manor



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Illustrative view of proposed Phase 1 street scene

7. Creating well defined streets and spaces

Are buildings designed and positioned with landscaping to define and enhance streets and spaces and are buildings designed to turn street corners well?

- The design of the roads and location of buildings will be considered together to ensure streets are well defined and legible with good frontage
- A street hierarchy has been considered using primary, secondary and mews lanes
- The integration of landscaping into the street scene is of key importance to the scheme and has been considered from the outset including provision of street trees



Plan showing key identified features within the Phases 3 & 4 Site Plan

8. Easy to find your way around

Is the scheme designed to make it easy to find your way around?

- A legible masterplan has been designed with a clear street hierarchy
- The street network provides clear views to connecting streets.
- A landmark feature (central green space) located centrally acts as an identifiable location within the masterplan for orientation
- Alternate north-south and east-west routes are provided across the masterplan to encourage permeability

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STREET & HOME

9. Healthy Streets

Are streets designed in a way that encourage low vehicle speeds and allow them to function as social spaces?

- Tree lined streets
- The intention is to achieve a 20mph zone across the site
- Detailed highways design will take place to ensure adequate traffic calming features are incorporated at appropriate intervals to achieve this
- Traffic calming features should be effective yet subtle and not detrimental to the intended character of the masterplan
- Mews lanes where used will be shared surface areas
- A comprehensive hard landscaping strategy will be developed to select materials that assist with achieving a 20mph zone and create a safe a legible vehicular and pedestrian movement network
- Building frontages will actively contribute to the street providing natural surveillance. In the Mews lanes this will be in the form of Coach Houses with living space located above garages with overlooking windows



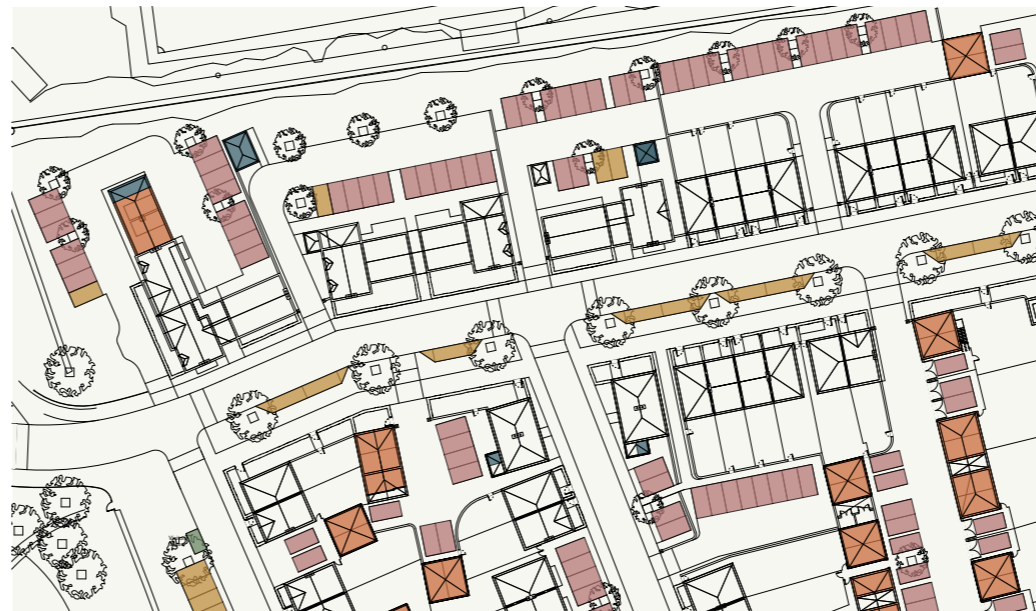
Sketch showing the tree lined streets of Phases 3 & 4



10. Cycle and car parking






Is resident and visitor parking sufficient and well integrated so that it does not dominate the street?

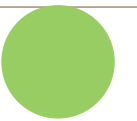
- Provision of cycle parking that is as easy to access as car parking
- An appropriate level of car parking will be provided to meet the BaNES car parking standards
- A mix of car parking solutions will be used across the site including on plot parking, street parking, courtyard parking and mews lane parking
- Courtyard parking for apartment blocks will be limited to a smaller number of spaces and will be laid out so as to be overlooked. Where courtyards are located adjacent to each other they will be separated by hedges or walls
- Parking within Mews lanes will be clearly demarcated. The method of demarcation will be determined as part of the hard landscape strategy
- Routes from parking spaces to properties will be carefully considered as part of the detailed masterplan development process



Extract of Parking Plan for Phase 1 showing range of parking solutions utilised

key:

-  Covered allocated parking
-  Allocated parking
-  Visitor parking
-  Communal bike storage
-  Visitor bike racks



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Sketch view of central green space

11. Green and blue infrastructure

- The development creates a network of linked and integrated open spaces located throughout the site, which are of varying character and provide connections to the wider countryside.
- The scheme utilises the existing southern woodland belt, providing opportunities for recreational activity, through the provision of pedestrian and cycle paths, seating and picnicking
- The whole site will be managed and maintained to maximise its recreational and ecological value as well as fulfilling landscape mitigation requirements.
- Drainage features will be selected as appropriate depending on the location and available space, with elements to recover or re-use water, such as water butts, rain gardens at properties, on plot soakaways, permeable paving and tree pits for runoff from individual or shared drive areas or parking courts.



Front elevations that provide good surveillance to the street

12. Back of pavement, front of home

Will public and private spaces be clearly designed and designed to be attractive, well managed and safe?

- A palette of boundary treatments will be developed as part of the detailed design process to ensure clear demarcation between public and private space
- Boundary treatments will be appropriate for the status of the building/space they belong to
- Care will be taken when undertaking the elevational design to ensure there is good natural surveillance from buildings across both public and private spaces



WELBECK LAND

BMD

Ben Pentreath