

West of Bath Landscape and WHS Impact Assessment

Area 2

Bath and North East Somerset Council

Final report

Prepared by LUC

January 2024



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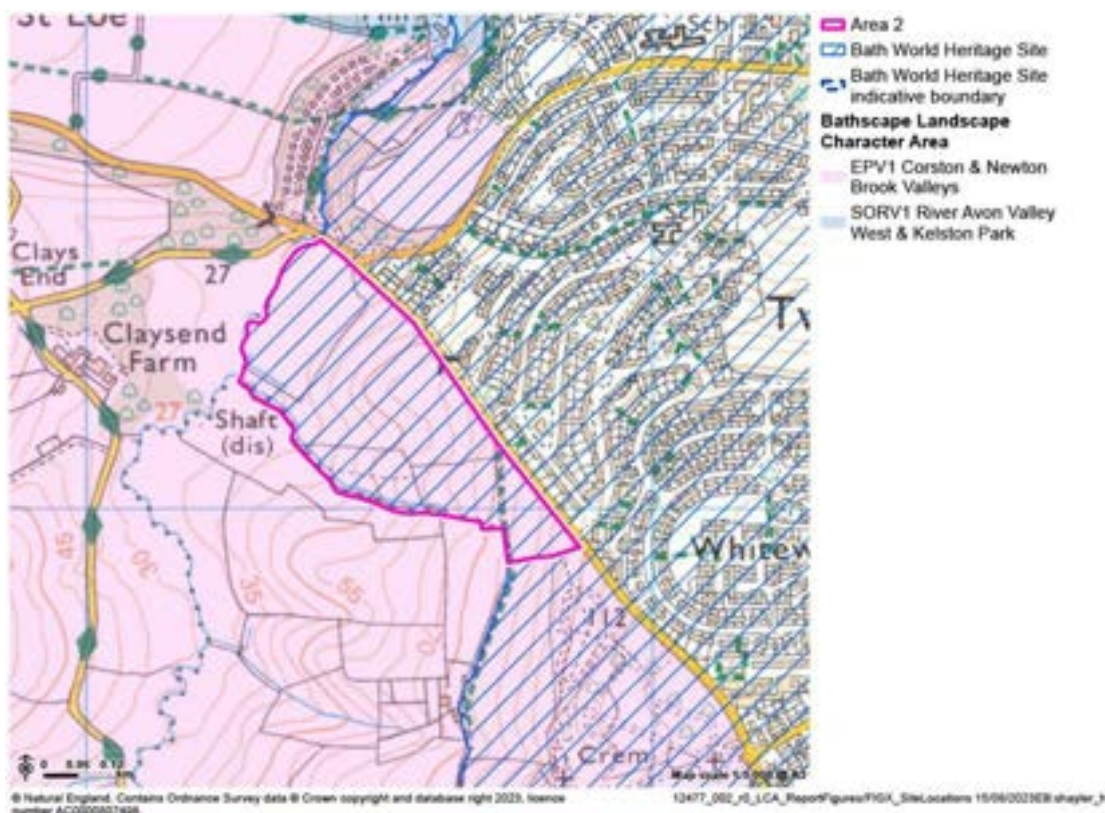
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Chapter 1

Local Landscape Character Baseline

Figure 1.1: Location of Area 2



Existing Landscape Classification

1.1 In the Bathscape Landscape Character Assessment (2017), Area 2 falls within the EPV1: Corston and Newton Brook Valleys LCA (Eroded Plateau and Valleys LCT).

1.2 In the City of Bath World Heritage Site Setting SPD (2013), Area 2 is located within the Newton St Loe Plateau Zone.

Key Characteristics

- A gently undulating landscape, forming part of the west facing slopes of the Newton Brook valley. The brook runs along the north-western boundary.
- Fences and clipped hedges separate the irregular-shaped arable and pastoral fields of varying sizes.
- Tree cover is limited to deciduous woodland along the meandering Newton Brook and a minor tributary stream along the south-eastern boundary, a small triangular copse in the south-eastern corner, as well as occasional hedgerow trees.
- An unsettled agricultural landscape with an absence of built form, although some intervisibility with properties along the edge of Twerton.
- An open landscape with long views across the Newton Brook valley, with extensive views of the surrounding countryside from a public footpath which crosses the upper slope in the south-east. Views extend to the Cotswolds Escarpment in the north.

Natural Influences

Landform, Drainage, Geology and Soils

Figure 1.2: Landform and drainage of Area 2



Figure 1.3: Bedrock geology of Area 2

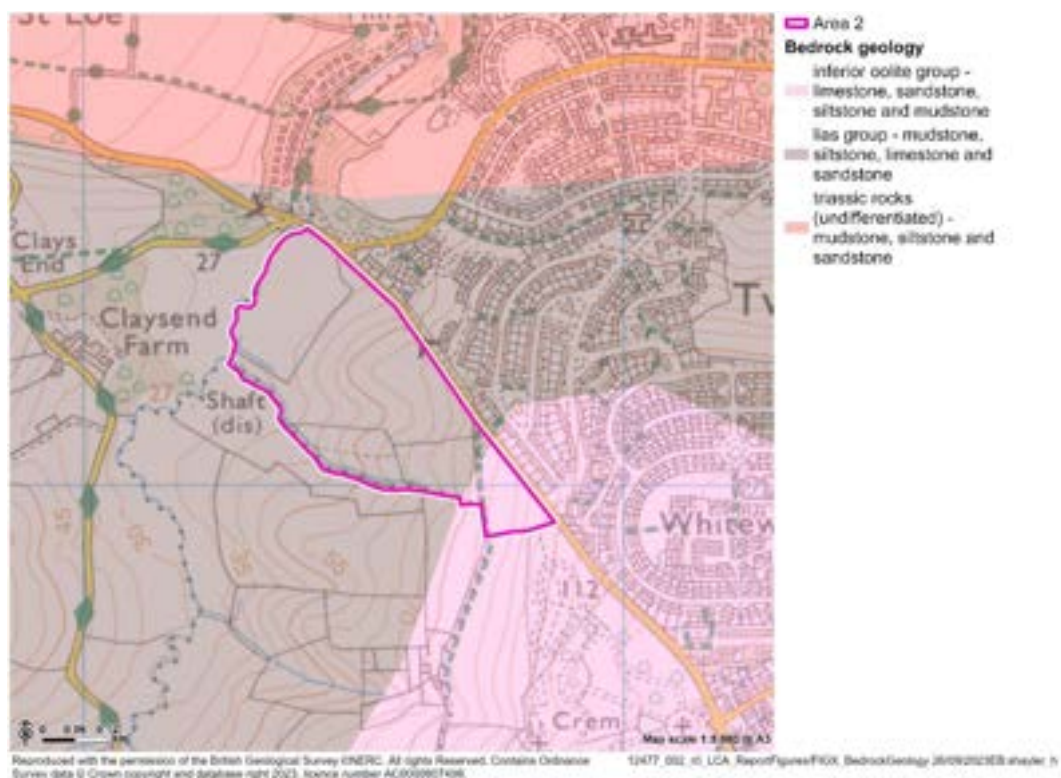
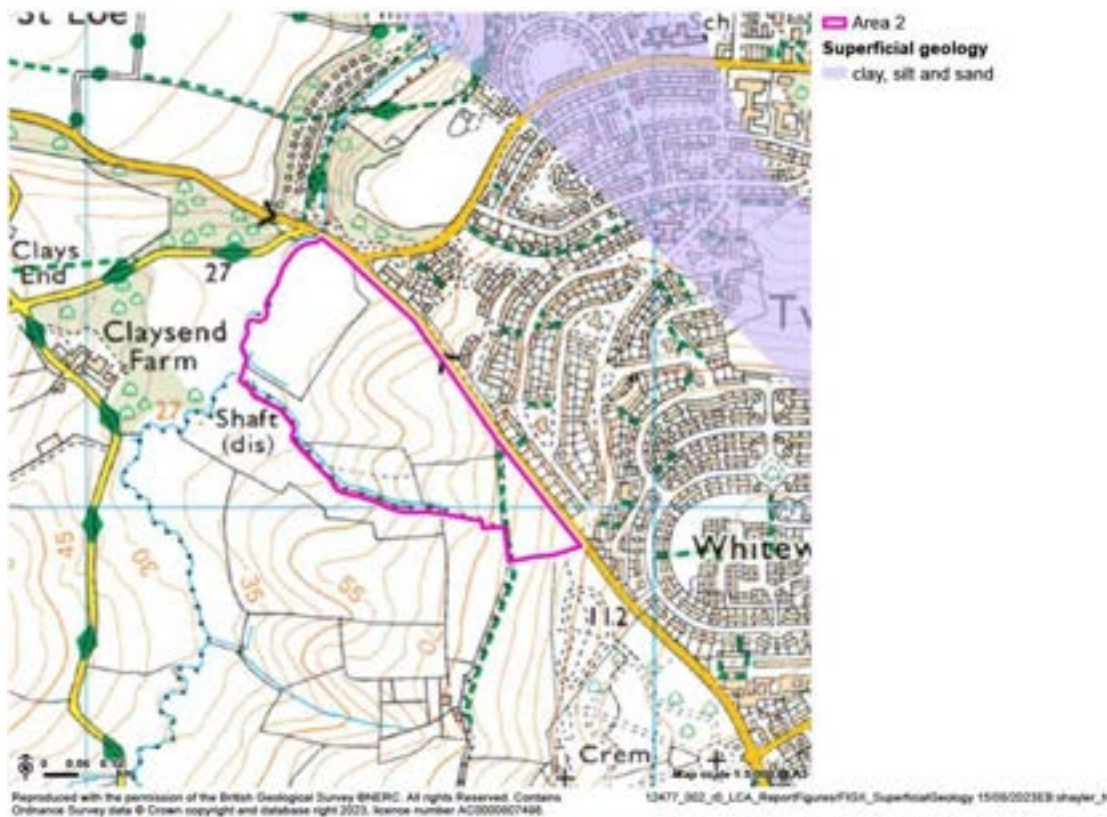


Figure 1.4: Superficial geology of Area 2



1.3 The area forms part of a west facing rounded slope of the Newton Brook valley, rising from 30m Above Ordnance Datum (AOD) in the north-west to its highest point at 95m AOD in the south-east. The Newton Brook runs along the north-western boundary, and an unnamed minor tributary stream runs along the south-western boundary.

Figure 1.5: West facing valley slope of Area 2



1.4 The area is overlain by slowly permeable loamy and clayey soils which typically support both arable and pastoral land uses.

1.5 In this area, the greater Oolite of the Cotswolds Hills and dip-slope were eroded, leaving the underlying bedrock strata to shape the current undulating landform. This includes a mixed bedrock of mudstone ((Charmouth Mudstone Group) in the north and west, sandstone (Bridport Sand Formation) in the east and Limestone (Inferior Oolite Group) in the south.

Semi-natural Habitats

Figure 1.6: Nature conservation designations in Area 2

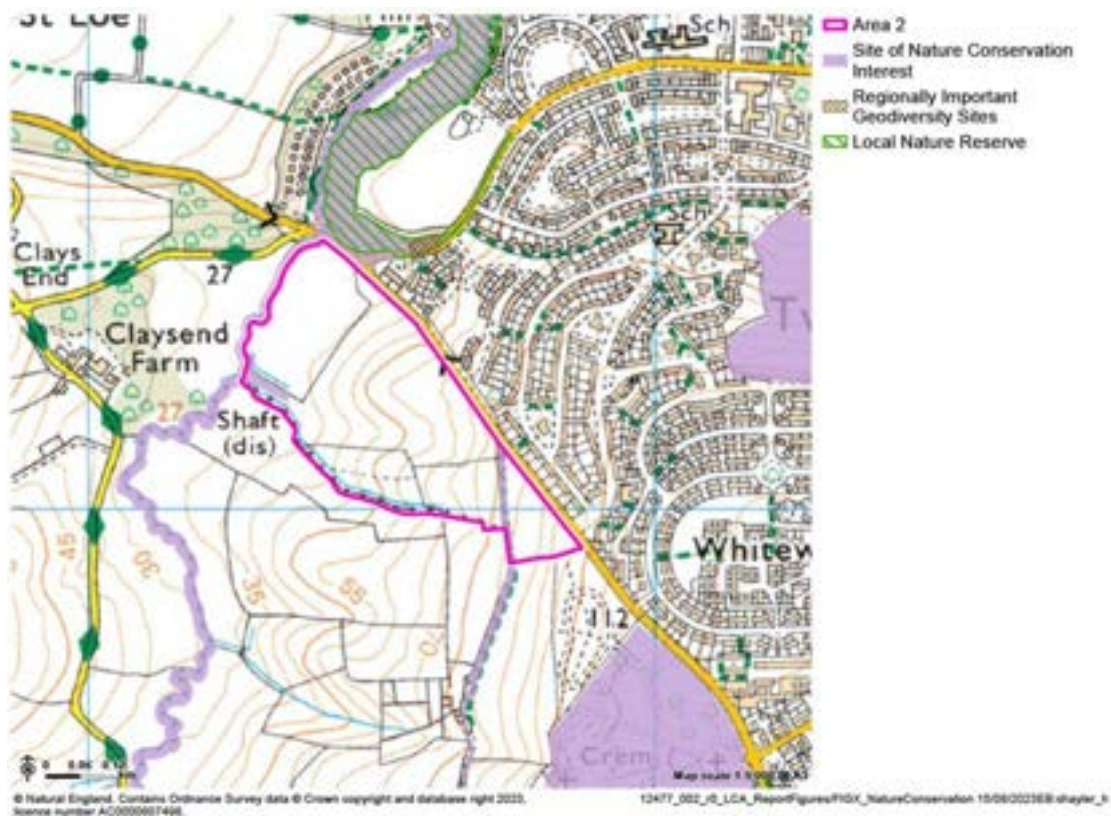


Figure 1.7: Woodland coverage of Area 2



1.6 Tree cover across the area is limited. Belts of deciduous woodland run along the Newton Brook and its tributary stream, a small triangular copse lies in the south-eastern corner and occasional trees are along the road boundary. The wooded watercourse of Newton Brook is designated as a Site of Nature Conservation Interest (SNCI). Haycombe Lane cuts through the area in the south-east and is also designated as a SNCI for its hedge and grass verge habitat. There are occasional hedgerow trees along field boundaries and along Whiteway Road (which forms the north-eastern boundary).

Figure 1.8: Woodland along the Newton Brook



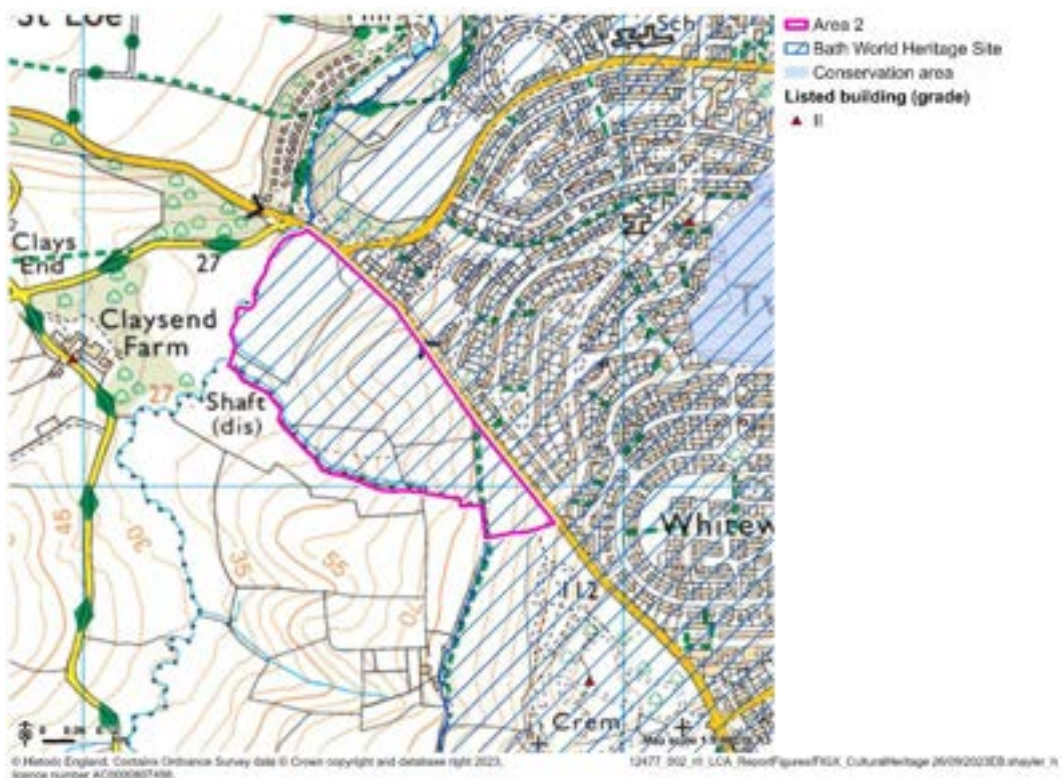
Figure 1.9: Haycombe Lane



Cultural Influences

Historic Features

Figure 1.10: Cultural heritage designations in Area 2



1.7 The area lies within the City of Bath World Heritage Site. There are no designated heritage features within the area.

1.8 Coal mines operated around the bottom of Pennyquick (along the north-western edge of the area) from the early 18th century to around 1845, although today there is little evidence of this apart from the occasional crop marks.

Land Use and Landscape Pattern

1.9 The area comprises mixed fields that are generally irregular in shape and vary in size. There appears to have been only limited field amalgamation since the 1885 OS Somerset Series map. However, a detail from the 1742 map – Bath and Five Miles Around by Thomas Thorpe, shows the majority of fields were regular in shape and smaller in size.

1.10 The Avon HLC classifies this area under 'Post-medieval designed ornamental landscapes'; however, there are no features within the area that indicate it was once part of a designed landscape.

Settlement Pattern, Road Pattern and Recreation

1.11 There are no settlements within the area; however, the settlement edge of Bath, overlooks the area. The north-eastern boundary of the area is formed by Whiteway Road, a busy road which defines the urban edge of Twerton (south-eastern boundary of Bath). There is some intervisibility with houses along the edge of Twerton seen between gaps of vegetation that lines the road.

1.12 The area is crossed by a public footpath along the upper slope in the south-east.

Figure 1.11: Settlement edge of Twerton along Whiteway Road



Perceptual Influences

Perceptual Character

Figure 1.12: Tranquillity of Area 2

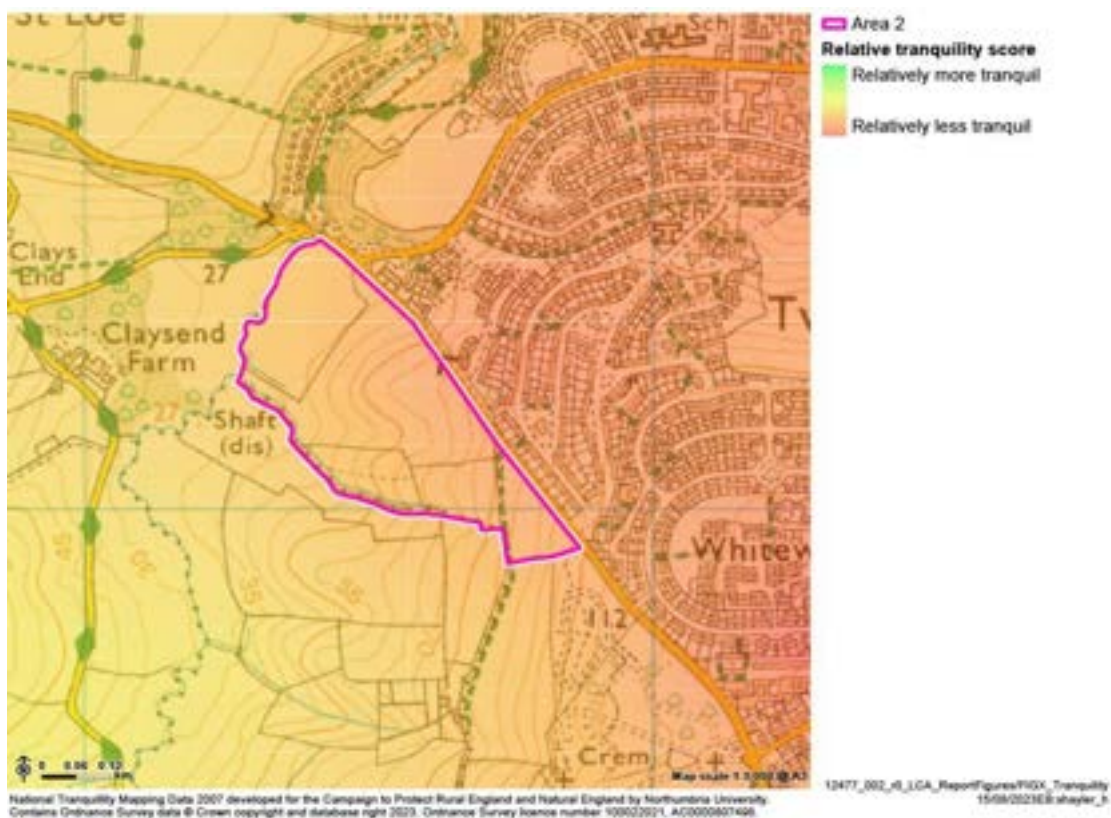
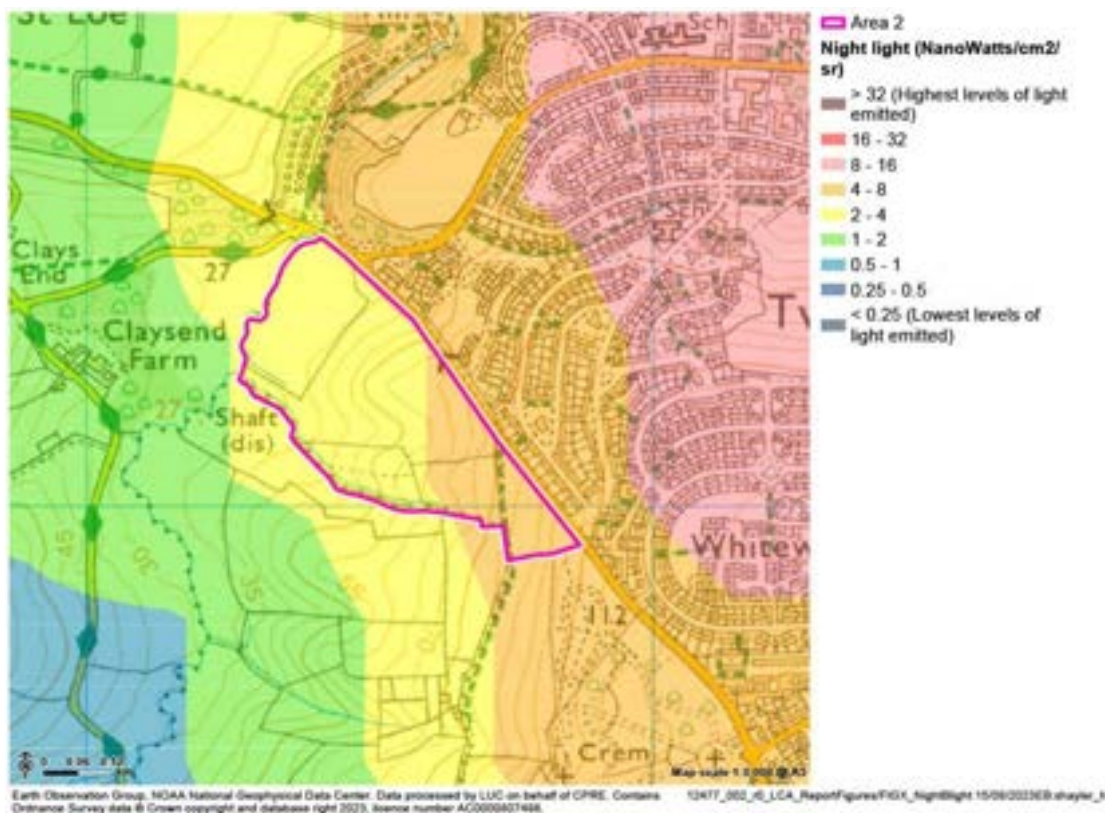


Figure 1.13: Dark skies of Area 2



1.13 The rural character and sense of remoteness is influenced locally by the urban edge of Twerton and Whiteway Road, affecting tranquillity. Lighting from the settlement edge disrupts the experience of dark skies.

Visual Character

1.14 The landscape of Area 2 is generally open in character with some localised enclosure from the woodland belts running along the watercourses. There are close views to the edge of Twerton in the east. To the west views are more expansive, across the wooded course of the Newton Brook to the steep east-facing valley side. The gently undulating terrain of the valley with its patchwork of mixed agricultural fields bound by clipped hedges, with occasional hedgerow trees and copses forms a prominent backdrop in views from Area 2, with the treed ridgeline extending south of Newton St Loe.

1.15 To the north, views extend to the Cotswold Escarpment which can be seen rising steeply above the River Avon.

Figure 1.14: Steep valley side of the Newton Brook and the village of Newton St Loe seen from the edge of Area 2



Intervisibility with the World Heritage Site (WHS) and Cotswolds National Landscape

1.16 Area 2 lies within the City of Bath WHS and is recognised as contributing to the landscape setting of Bath (Policy NE2A). The city is largely hidden when viewed from the area, with the exception of the overspill at Twerton which affects the character of the settlement edge.

1.17 The Cotswolds National Landscape is located approximately 1.5km to the north of Area 2, on the rising escarpment above the River Avon, and the area

forms part of the rural surroundings to the nationally protected landscape. Extensive views are available from the Cotswolds National Landscape across the Newton Brook valley, including from a range of views from the Cotswolds Way.

Key Views Identified by the City of Bath WHS Setting SPD

1.18 The following sets out the key views identified by the City of Bath WHS Setting SPD. The view locations are shown Map 7 (Appendix 2 of the SPD). Historic views from the Georgian period are shown on Map 9 (Appendix 4 of the SPD). The locations of road viewpoints are shown on Map 14 (Appendix 7 of the SPD).

- Viewpoint 1 – Prospect Stile: On the route of the Cotswold Way, this viewpoint is one of only a few which shows the city in the context of the surrounding hills looking from the outside of the city. The view to Prospect Stile and Kelston Round Hill was praised by John Wood seen from the south-west corner of Queen Square soon after its construction. A panoramic view is afforded towards the western edge of Bath, showing the city in a hollow surrounded by hills, with middle views to the Cotswold Way to the south and distant views of the Avon valley and hills beyond to the south. There are glimpsed views of Area 2 seen beyond intervening vegetation and topography, approximately 4km away.
- Viewpoint 2 – Beckford’s Tower and Lansdown Cemetery: There are commanding views of Bath both from the tower and at ground level from Lansdown Cemetery (once part of the pleasure garden) showing its setting and containment within the surrounding hills and open landscape. There are relatively distant views of the Newton Brook Valley between Newton St. Loe and Twerton. Area 2 can be glimpsed approximately 3.8km away beyond intervening vegetation and buildings on the edge of Bath.
- Kelston Park is listed as a site of significance from the Georgian period (WHS SPD Appendix 5 Map 11). The house at Kelston Park was

designed to take advantage of the view over the Avon Valley and the owner's coal mines at Newton St Loe. The valley now provides part of the rural surroundings to the park. From the house, Area 2 is largely obscured by intervening vegetation and topography. However, there are views of Area 2 (approximately 2.3km away) from the elevated slopes of the park, and from Viewpoint K1 which is located along Kelston Road at the entrance to the park.

Key Views from the Cotswolds National Landscape

- Cotswolds Way – Wide panoramas overlooking the city and its rural backdrop are available from the Cotswolds Way including at Dean Hill (nr Pendean Farm), Kelston Round Hill and Prospect Stile.
- Kelston Park – Views from the elevated parkland slopes (as described above).

Landscape Evaluation

Key Sensitivities and Values

- The gently undulating valley slope to the Newton Brook with a sense of openness.
- The Newton Brook and Haycombe Lane are important landscape features and ecologically valued (designated as SNCI) with potential for wider biodiversity enhancement.
- The arable and pastoral hedged fields, and absence of settlement, contribute to rural character.

- The linear woodland along the Newton Brook and its minor stream tributary, contribute to rural character.
- Recreational value of the PRow along Haycombe Lane.
- An open landscape with uninterrupted views across the Newton Brook valley as well as to and from the Cotswolds scarp within the Cotswolds National Landscape.
- Forms a small part of the wider rural prospect when viewed from the Cotswold Escarpment. Views from the Cotswold Escarpment is one of the special qualities of the Cotswolds National Landscape.
- Forms a small part of the wider rural landscape to the City of Bath WHS.

Chapter 2

Criteria for assessment

Criteria for Landscape Sensitivity

2.1 Landscape sensitivity assessment requires judgements on both landscape susceptibility (how vulnerable the landscape is to change as a result of potential development) and landscape value (consensus about importance).

2.2 The selection of landscape sensitivity indicators ('criteria') for the Landscape Sensitivity Assessments in this report is informed by the attributes of landscape that could be affected by potential development. These consider the 'landscape', 'visual' and 'perceptual' aspects of sensitivity. Their selection is also based on current best practice and experience of LUC in undertaking similar studies elsewhere in the UK.

2.3 The following criteria headings are used for the Landscape Sensitivity Assessments:

- Landform;
- Openness and enclosure;
- 'Natural' character;
- Landscape pattern and time depth;
- Historic features;
- Settlement form and edge;
- Recreational value;
- Perceptual character;
- Visual character; and

■ Setting of the AONB

2.4 The following text in this chapter provides guidance and examples of higher and lower sensitivity features/attributes for applying the criteria to the West of Bath landscape.

2.5 The Landscape Sensitivity Assessments in this report present a commentary against each criterion to inform the judgements on levels of sensitivity. It is important to note that the relative importance of each criterion varies between landscapes (due to differences in landscape character). The initial stage of the assessment involved a thorough desk-based study drawing on sources of spatial and descriptive information regarding the landscape. This was supplemented by field survey work undertaken by a team of landscape professionals to verify the findings.

Indicators of Landscape Sensitivity

Landform

2.6 This considers the shape of the landscape. Smooth, gently undulating or flat landforms are likely to be less sensitive to development. Dramatic landform changes or distinct landform features (e.g. incised valley with prominent slopes, hills) are likely to increase sensitivity.

- Lower Sensitivity: Absence of strong topographical variety. Featureless, smooth, very gently undulating or flat landform.
- Moderate Sensitivity: Undulating landform or some distinct landform features.
- Higher Sensitivity: Presence of strong topographical variety or distinctive landform features.

Openness and Enclosure

2.7 This considers how open or enclosed the landscape is. Landscapes with a strong sense of enclosure (e.g. provided by field boundaries, tree/woodland cover, landform or buildings) are likely to be less sensitive to development than an open and unenclosed landscape because these features will be able to provide screening.

- **Lower Sensitivity:** A very well enclosed landscape – e.g. with fields bounded by high hedges and dense tree/woodland cover or contained by landform or buildings.
- **Moderate Sensitivity:** Some areas lacking screening by field boundaries, tree/woodland cover, landform or buildings, whilst others might have a greater sense of enclosure owing to a denser occurrence of these features.
- **Higher Sensitivity:** Exposed, visible landscapes with no field boundaries, tree/woodland cover, landform or buildings to provide screening.

‘Natural’ Character

2.8 This considers the ‘naturalistic’ qualities of the landscape in terms of the coverage of semi-natural habitats and valued natural features (e.g. trees and hedgerows) which contribute to landscape character and could be vulnerable to loss from development. Landscapes with frequent natural features (including large areas of designated habitats) result in increased sensitivity to development, while landscape with limited natural features will be less sensitive.

- **Lower Sensitivity:** Lack of semi-natural habitat coverage or valued natural features e.g. intensively farmed or brownfield sites.
- **Moderate Sensitivity:** Some occurrence of valued semi-natural habitats and features (e.g. tree, hedgerows, woodland).

- Higher Sensitivity: Frequent occurrence of valued natural features (tree, hedgerows, woodland) and presence of larger areas of semi-natural habitats.

Landscape Pattern and Time Depth

2.9 This considers the field pattern and historic time depth of the landscape. Landscapes with more irregular and smaller field patterns, particularly those of historic origin, are likely to be more sensitive to the introduction of development than landscapes with regular, larger-scale and more modern field patterns.

- Lower Sensitivity: Simple, large scale, regular or uniform field patterns (mainly of modern origin).
- Moderate Sensitivity: Mixture of simple and complex landscape field patterns and time depth.
- Higher Sensitivity: Dominated by more complex, smaller-scale irregular and varied field patterns (including historic field patterns e.g. piecemeal enclosure with irregular boundaries).

Historic Features

2.10 This considers the presence of historic features *that contribute to landscape character* (i.e. visible features that may be designated as Conservation Areas, Scheduled Monuments or listed buildings, or other archaeological features). Landscapes with a high density of visible historic features important to the character of the area are likely to be more sensitive to the introduction of modern development than landscapes where such development already exists.

- Lower Sensitivity: A landscape with an absence of or relatively few visible historic features.
- Moderate Sensitivity: Presence of some visible historic features that contribute to landscape character, or adjacent to historic features.

- Higher Sensitivity: A landscape with a high density of visible historic features that contribute to landscape character.

Settlement Form and Edge

2.11 The extent to which development of the landscape would relate to the existing adjacent settlement, with reference to the form and pattern of the settlement and character of the settlement edge and presence of boundary features e.g. a major road/river. A settlement edge that is well integrated with the surrounding rural fringe through strong landscape features (e.g. woodland or river) will be more sensitive than an exposed settlement edge (with no landscape features to integrate it with the rural fringe).

- Lower Sensitivity: Development would have a good relationship with the existing settlement form/pattern. Development may offer opportunities to enhance an exposed settlement edge and integrate it with the rural fringe.
- Moderate Sensitivity: Development may be slightly at odds with the existing settlement form/pattern. Development may adversely affect the existing settlement edge to some extent. It would be perceived as settlement advancement into the countryside but would not cross a distinctive boundary feature.
- Higher Sensitivity: Development would have a poor relationship with the existing settlement form/pattern. Development may adversely affect an existing settlement edge which is well integrated with the landscape e.g. by a wooded edge. It would cross a boundary feature and/or would extend development into an area with a distinctly different landscape – e.g. the extension of settlement beyond a ridge crest or into a valley.

Recreational Value

2.12 This considers the presence of features and facilities which enable enjoyment of the landscape, and the importance of these. This may include public rights of way, open access land, country parks and outdoor tourist/ visitor

attractions with facilities where enjoyment of the landscape is important to the experience. Importance of features may be indicated by their promotion as long-distance footpaths or recreation routes, national cycle routes, country parks and outdoor tourist attractions often marked on Ordnance Survey maps.

- Lower Sensitivity: Publicly inaccessible or limited provision of recreational facilities or recreational value limited to community sports facilities (where enjoyment of the landscape is not integral to the activity).
- Moderate Sensitivity: Landscapes with green spaces or recreation areas valued in the local context. Some Public Rights of Way and footpaths.
- Higher Sensitivity: Landscapes important for access and enjoyment of the landscape e.g. open access land, country parks or outdoor tourist attractions with visitor facilities. High density of well-connected Public Rights of Way/promoted routes.

Perceptual Character

2.13 This considers qualities such as rurality (traditional land uses with few modern, human influences), sense of remoteness and/or tranquillity. High scenic value, freedom from human activity/disturbance and 'dark skies' would add to sensitivity in this criterion because development will introduce new features which may detract from a sense of tranquillity and or remoteness.

- Lower Sensitivity: A landscape strongly influenced by visible or audible signs of human activity and modern development.
- Moderate Sensitivity: Some sense of rural character and scenic qualities, but with some signs of human activity and modern development.
- Higher Sensitivity: A highly scenic, rural landscape, remote from visible or audible signs of human activity and modern development.

Visual Character

2.14 This considers the visual prominence of the landscape, and extent to which potential development would be visible from surrounding areas. It also considers the visual relationship with the Cotswolds National Landscape, City of Bath World Heritage Site, and local landmark features (e.g. Kelston Park).

- Lower Sensitivity: Visually enclosed landscape with limited views of potential development from surrounding areas. The landscape has limited intervisibility with the Cotswolds National Landscape, City of Bath World Heritage Site, and/or landmark features.
- Moderate Sensitivity: Semi-enclosed landscape with some views of potential development from surrounding areas. The landscape has some intervisibility with the Cotswolds National Landscape, City of Bath World Heritage Site, and/or landmark features.
- Higher Sensitivity: Visually prominent landscape with extensive visibility of potential development from surrounding area. The landscape has strong intervisibility with the Cotswolds National Landscape, City of Bath World Heritage Site, and/or landmark features.

Setting of the Cotswolds National Landscape

2.15 This considers the extent to which the landscape of the assessment unit forms part of the ‘setting’ of the Cotswolds National Landscape and the extent to which development could have an adverse impact on that setting. The setting of the Cotswolds National Landscape is described as the area outside the designated landscape “within which development and land management proposals, by virtue of their nature, size, scale, siting materials or design can be considered to have an impact, positive or negative on the landscape, scenic beauty and special qualities of the Cotswolds AONB” **[See reference 1]**.

- Lower Sensitivity: The landscape has limited intervisibility with the Cotswolds National Landscape and development would have limited

adverse impact on the landscape, scenic beauty and special qualities of the designated landscape.

- **Moderate Sensitivity:** The landscape has some intervisibility with the Cotswolds National Landscape and development would have some adverse impact on the landscape, scenic beauty and special qualities of the designated landscape.
- **Higher Sensitivity:** The landscape has strong intervisibility with the Cotswolds National Landscape, and development would have an adverse impact on the landscape, scenic beauty and special qualities of the designated landscape.

Criteria for WHS Designation and Sensitivity

Assessing the Heritage Value of the WHS

2.16 The importance of a World Heritage Site (WHS) is expressed in terms of its outstanding universal value (OUV). For sites to be of outstanding universal value and designated as a world heritage site of cultural significance they must meet one of the following criteria:

1. To represent a masterpiece of human creative genius.
2. To exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town-planning or landscape design.
3. To bear a unique or at least exceptional testimony to a cultural tradition or to a civilization which is living or which has disappeared.

4. To be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history.
5. To be an outstanding example of a traditional human settlement, land-use, or sea-use which is representative of a culture (or cultures), or human interaction with the environment especially when it has become vulnerable under the impact of irreversible change.
6. To be directly or tangibly associated with events or living traditions, with ideas, or with beliefs, with artistic and literary works of outstanding universal significance (The Committee considers that this criterion should preferably be used in conjunction with other criteria).

2.17 The City of Bath WHS has been designated under criteria one, two and four. The management plan for The City of Bath WHS breaks down the OUV into component parts called attributes. It identifies six headline attributes for Bath:

- Roman archaeology;
- The hot springs;
- Georgian town planning;
- Georgian architecture;
- The green setting of the city in a hollow in the hills; and
- Georgian architecture reflecting 18th century social ambitions.

2.18 Under these headings, The City of Bath World Heritage Site Management Plan 2016-2022 identifies 53 sub-attributes that provide more detail on how the attribute is conveyed. These are listed in Appendix B.

2.19 The attributes are a list of characteristics or qualities that convey the values identified in the statement of OUV. These characteristics are conveyed to the observer through receptors. Receptors include tangible features such as

individual assets and material remains, views, landscape character, location and setting, form, function and use, and also intangible aspects such as traditions, language, spirit and feeling.

2.20 The contribution assessment units make to outstanding universal value of the WHS has been established by considering if and how the unit conveys each headline attribute. This has been done by looking at the receptors within the unit and how they relate to each sub-attribute. The more sub-attributes the unit has and the more strongly they are conveyed, the greater the contribution of the area to the OUV of the WHS. The following is a non-exhaustive list of ways in which a unit may convey the attributes:

- Archaeological remains, buildings and structures within the unit;
- Include or be adjacent to historic roads, rides and paths;
- The landscape character of the unit, including current and legible traces of past land use;
- Spatial characteristics and relationship with the city, surrounding settlements and topographical features;
- As part of views from within and across the city that show the city in its landscape setting; and
- As part of views within the setting of the city that show the open, undeveloped, rural character of the city surrounds.

2.21 Not every assessment unit conveys all attributes. A baseline assessment for each assessment unit established what receptors it contained or contributed to and which attributes they conveyed. This study lists those receptors and the associated attribute(s). If it was found as part of the baseline assessment that the assessment unit did not contain or contribute to an attribute, that attribute has not been considered any further as part of this study.

2.22 The following levels have been used to grade the contribution of the unit to an attribute, and subsequently to OUV:

- High – The assessment unit forms a very important part of the attribute, with receptors that strongly convey or reveal aspects of the OUV.
- Medium – The assessment unit forms an important part of the attribute, with receptors that moderately convey or reveal aspects of the OUV.
- Low – The assessment unit forms a marginally important part of the attribute, with receptors that make a small contribution to conveying or revealing aspects of the OUV.
- None – The assessment unit does not form part of the attribute, with no receptors that convey or reveal the OUV.

2.23 The overall contribution of the assessment unit to the OUV of the WHS then need to be considered. The headline attributes have not been hierarchised in the management plan or SPD in terms of their contribution/significance to the OUV. As such, each are considered to be of equal importance in conveying the OUV of the property as a whole. Accordingly, if an attribute is identified as high then the contribution of the assessment unit to overall OUV is considered to be high. The more attributes the assessment unit conveys the more dynamic its contribution to OUV, but equally the number of receptors it contains or attributes it conveys does not determine importance – it is how strongly the attributes are conveyed that tells us the measure of its contribution.

Assessing the Effect on Attributes and OUV

2.24 Assessing the effect of the proposed development types involves looking at the impact on the receptors and how that changes the ability of the unit to convey that attribute, in either a beneficial or adverse manner. The level of effect is not automatically proportionate with the number of attributes an area has or its overall contribution to the OUV, but rather is dependent on the type of receptors that convey the OUV and how they may be affected by the type of proposed change to the site. The following is a non-exhaustive list of ways in which attributes may be affected:

- Partial or total loss of physical remains;

- Change in views that convey the attributes;
- Change in landscape character – land use, settlement patterns and density, road and path networks; and
- Change in spatial and visual relationship between city and its landscape setting.

2.25 The following levels have been used to grade the potential impact of a development scenario on its ability to convey the attributes:

- Major adverse – The development of the unit would strongly compromise its ability to convey or reveal the attributes.
- Moderate adverse – The development of the unit would moderately compromise its ability to convey or reveal the attributes.
- Minor adverse – The development of the unit would marginally compromise its ability to convey or reveal the attributes.
- Neutral – The development of the unit would not change its ability to convey or reveal the attributes.
- Minor beneficial – The development of the unit would marginally enhance its ability to convey or reveal the attributes.
- Moderate beneficial – The development of the unit would moderately enhance its ability to convey or reveal the attributes.
- Major beneficial – The development of the unit would strongly enhance its ability to convey or reveal the attribute/OUV.
- N/A – Development type is not proposed on the unit or the unit does not convey the attributes.

2.26 To fully understand the impact on the WHS, it is necessary to take the above level of potential impact on the assessment unit and considers it against its relative contribution to the OUV. This final step helps to establish a proportionate level of effect on the WHS overall. For this, the following levels and definitions have been used:

- High adverse/beneficial

- The assessment unit makes a high contribution to OUV and the potential impact of the development is likely to be major.
- Medium-high adverse/beneficial
 - The assessment unit makes a high contribution to OUV and the potential impact of the development is likely to be moderate; or
 - The assessment unit makes a medium contribution to OUV and the potential impact of the development is likely to be major.
- Medium adverse/beneficial
 - The assessment unit makes a high contribution to OUV and the potential impact of the development is likely to be minor; or
 - The assessment unit makes a medium contribution to OUV and the potential impact of the development is likely to be moderate; or
 - The assessment unit makes a low contribution to OUV and the potential impact of the development of the area is likely to be major.
- Low-medium adverse/beneficial
 - The assessment unit makes a medium contribution to OUV and the potential impact of the development is likely to be marginal; or
 - The assessment unit makes a low contribution to OUV and the potential impact of the development is likely to be moderate.
- Low adverse/beneficial
 - Assessment unit makes a low contribution to OUV and the potential impact of the development is likely to be marginal.
- None
 - The assessment unit makes a high, medium, or low contribution to OUV but the potential impact of the development is none. The development may still be perceptible as a change to the area, but this change would not interact with any of the attributes of the area.

2.27 When considering the above potential effects and risk of harm in terms of the National Planning Policy Framework, high adverse effects are considered the equivalent of substantial harm (paragraphs 200 and 201). Low to medium-high are considered the equivalent of less than substantial harm (paragraph 202), to varying degrees.

2.28 When considering the above effects in relation to UNESCO's 'Guidance and Toolkit for Impact Assessments in a World Heritage Context' (UNESCO, ICCROM, ICOMOS and IUCN, 2022), any harm that is more than negligible is considered significant (section 6.9, p.44). If avoidance or mitigation can reduce the harm to an 'acceptable level' – that is, so the harm is then none or negligible – then the proposal may be acceptable. If the residual harm is any greater than this, it is considered significant.

Chapter 3

Assessment Unit 2

Landscape Sensitivity Assessment

Figure 3.1: Location of Assessment Unit 2

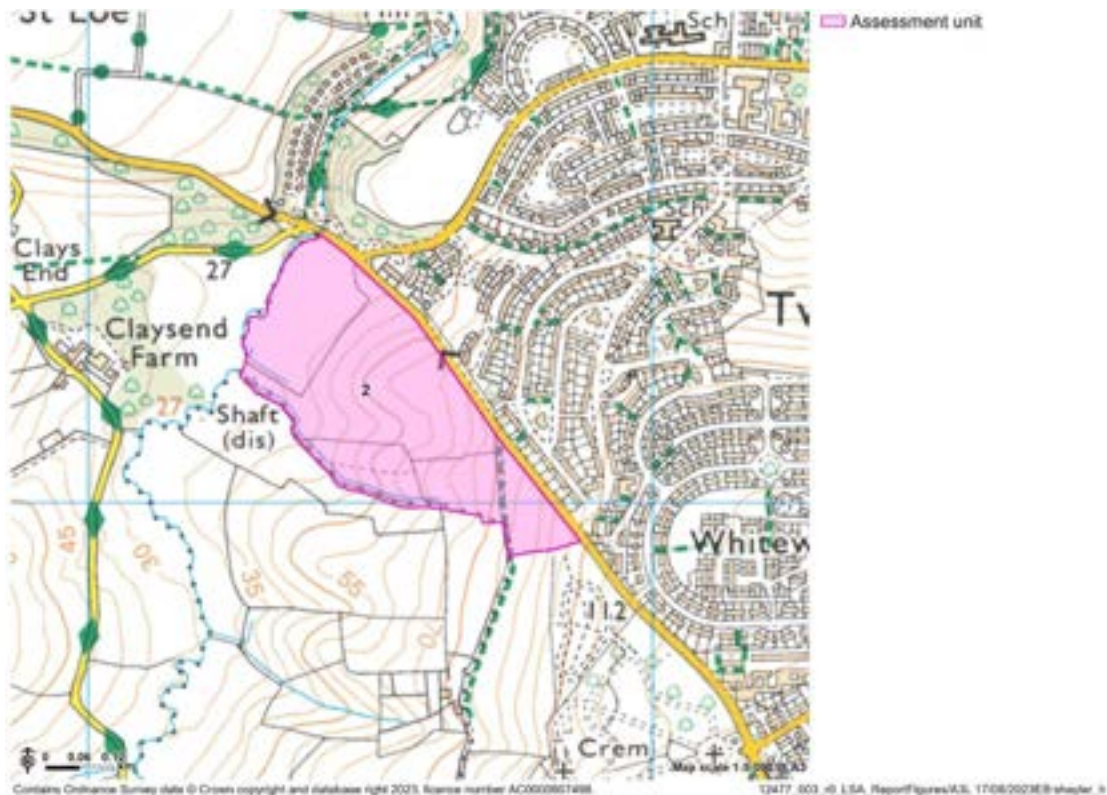


Figure 3.2: View towards Assessment Unit 2 from the east-facing slopes of the Newton Brook



Commentary Against Landscape Sensitivity Indicators

Landform

3.1 The assessment comprises a prominent undulating slope rising from the Newton Brook. This is a distinct landform feature which forms a small part of the wider undulating valley landscape.

3.2 Overall, the landform is of high sensitivity to all potential development types assessed for this unit.

Openness and Enclosure

3.3 The low clipped hedgerows within and around the assessment unit result in a strong sense of openness, particularly along its most elevated north-eastern edge.

3.4 There is some localised enclosure from the woodland belts that run along the Newton Brook to the north and west, as well as containment by the rising landform and vegetation on the edge of Twerton to the east.

3.5 Overall, the sense of openness and enclosure is of high sensitivity to all potential development types assessed for this unit.

‘Natural’ Character

3.6 Although limited in semi-natural features overall, the deciduous woodland lining the Newton Brook, and the hedge and grass habitat along Haycombe Lane, are both designated as SNCIs.

3.7 Overall, the ‘natural’ character is of moderate sensitivity to all potential development types assessed for this unit.

Landscape Pattern and Time Depth

3.8 Arable and pastoral fields of varying sizes are irregular in shape and bound by clipped hedges and fences, resulting from some modern amalgamation.

3.9 Overall, the landscape pattern and time depth is of moderate sensitivity to all potential development types.

Historic Features

3.10 There is a general absence of visible historic features across the landscape of the assessment unit, except for occasional crop marks which are evidence of the coal mines that operated around the bottom of Pennyquick.

3.11 Overall, the landscape within this criterion is of low sensitivity to all potential development types assessed for this unit.

Settlement Form and Edge

3.12 Whiteway Road and associated mature vegetation provides a strong boundary feature along the settlement edge of Bath.

3.13 Some of the adjacent buildings within Twerton (which have spilt over the upper reaches of the landscape bowl containing the city) can be seen between gaps in the vegetation and partially overlook the assessment unit.

3.14 The assessment unit is mostly rural in character with no built development. The open fields provide a rural approach to Bath, making a positive contribution to the character of the settlement edge.

3.15 Overall, the settlement form and edge is of moderate sensitivity to all potential development types assessed for this unit.

Recreational Value

3.16 A local footpath runs along the upper slope in the south-east, providing some recreational value.

3.17 Overall, the recreational value is of moderate sensitivity to all potential development types assessed for this unit.

Perceptual Character

3.18 The urban edge of Twerton and the busy Whiteway Road exert an urban influence on the character of the assessment unit, with localised effects on dark skies and tranquillity.

3.19 Overall, the perceptual character is of low sensitivity to all potential development types assessed for this unit.

Visual Character

Views of the Assessment Unit

3.20 The ZTV (in Appendix A) indicates that the extent of visibility is similar from potential development of up to 9m and 13m.

3.21 There will be visibility of potential development within the assessment unit from:

- The local footpath that crosses through it and the surrounding roads including Whiteway Road and Pennyquick Road.
- The surrounding edge of Twerton.
- Roads and footpaths on the valley slopes to the north, including the Cotswold Way National Trail (particularly from elevated viewpoints at Penn Hill, Dean Hill, Kelston Round Hill and Prospect Stile) and Kelston Road A431 (Road View K1).

- The designed parkland at Kelston Park (Grade II* Registered Park and Garden), which takes advantage of its location on the edge of the Cotswold escarpment to exploit views out across the Avon valley.
- The Circuit of Bath promoted route that runs along the bottom of the valley to the west.
- Public open spaces at elevated locations within Bath where there are distant south and south-west facing views over the valley landscape of the assessment unit. This includes locations such as Prospect Stile and Beckford's Tower and Lansdown Cemetery to the north and north-east (Viewpoints 1 and 2).

Views from the Assessment Unit

3.22 The landscape of the assessment unit has an open visual character with important visual relationships with surrounding areas, including the Cotswolds National Landscape.

3.23 Potential development on the assessment unit may obscure views of:

- The Cotswold Escarpment, which forms a prominent green backdrop rising from the River Avon to the north.
- The house at Kelston Park, which provides a local landmark.

3.24 Overall, the visual character is of high sensitivity to all potential development types assessed for this unit.

Setting of the Cotswolds National Landscape

3.25 The landscape of the assessment unit has an important visual relationship with the Cotswolds National Park to the north.

3.26 Overall, the setting of the Cotswolds National Landscape is of high sensitivity to all potential development types assessed for this unit.

Summary of Landscape Sensitivity

Table 3.1: Sensitivity scores

Development Types	Landform	Openness and Enclosure	‘Natural’ Character	Landscape Pattern and Time Depth	Historic Features	Settlement Form and Edge	Recreational Value	Perceptual Character	Visual Character	Setting of the CNL
Small scale residential (<1ha)	High	High	Moderate	Moderate	Low	Moderate	Moderate	Low	High	High
Medium scale residential (1-5ha)	High	High	Moderate	Moderate	Low	Moderate	Moderate	Low	High	High
Medium to large scale residential (5-10ha)	High	High	Moderate	Moderate	Low	Moderate	Moderate	Low	High	High
Large scale residential (>10ha)	High	High	Moderate	Moderate	Low	Moderate	Moderate	Low	High	High

3.27 The mixed arable and pastoral landscape of the assessment unit is limited in natural and cultural heritage features, and is afforded with some enclosure from mature vegetation, surrounding landform and buildings, which reduces sensitivity to development. Its perceptual character is influenced locally by the urban edge of Twerton and Whiteway Road abutting it.

3.28 However, the prominent slopes to the Newton Brook, the rural backdrop the landscape provides to the Circuit of Bath promoted route and part of the rural prospect from the Cotswold Escarpment (within the nationally protected Cotswolds National Landscape), as well as the green edge it provides to Bath and its detachment from the city, increases its sensitivity. The open character of the landscape from elevated parts of the assessment unit and the resulting intervisibility with the escarpment to the north from within the Cotswolds National Landscape, from viewpoints along the Cotswold Way to the north, and from south/south-westward facing views within the city, also increase sensitivity to development.

Variations in Landscape Sensitivity

3.29 Not applicable.

Landscape Sensitivity to Potential Residential Development

Table 3.2: Overall sensitivity of the assessment unit to residential development

Typology	Sensitivity
Small scale residential (<1ha) – 2-3 storey housing (9-13m), medium density (<50dw)	High

Typology	Sensitivity
Medium scale residential (1-5ha) – 2-3 storey housing (9-13m), medium density (<250dw)	High
Medium to large scale residential (5-10ha) – 2-3 storey housing (9-13m), medium density (<500dw)	High
Large scale residential (>10ha) – 2-3 storey housing (9-13m), medium density (<500dw)	High

Summary

3.30 The assessment unit is judged to have a high sensitivity to small scale (<1ha), medium scale (1-5ha), medium-large scale (5-10ha) and large scale (>10ha) residential development, as development of any size would be incongruous within the open rural landscape and from the strong boundary to the edge of the city in this location. The prominent landform of the assessment unit would result in development being widely visible, particularly from views that look eastwards across the valley. Development in this location would be seen as an extension to Twerton, a modern suburb that spills over the valley side from Bath and is incongruous with the generally compact settlement form of the city, which sits in a bowl surrounded by low hills. Development in this assessment unit, would also negate the role of the area as a rural approach and green edge to Bath, and would introduce modern development within the City of Bath WHS.

WHS Heritage Impact Assessment

Commentary Against Attributes and Receptors

3.31 This section considers the contribution of the assessment unit to the attributes of OUV. Where the baseline assessment has identified that the assessment unit does not contain any receptors that convey an attribute, that attribute has not been discussed.

Georgian Town Planning

3.32 The headline attribute is conveyed through the following sub-attributes:

- 10. The deliberate creation of a beautiful city.
- 11. Views and vista, within the Georgian city deliberately created by awareness of context, and beyond, including such components as Prior Park and Sham Castle, designed to view, and be viewed from, the city centre.
- 18. The principal historic road routes into the city, marking the arrival points for visitors who almost universally came by road.
- 20. 18th century picturesque principles including the relationship of buildings to landscape, the concept of blending countryside and town, and historic parks and gardens.

3.33 Receptors for this attribute include:

- The character and appearance of the assessment unit itself as undeveloped green countryside on the edge of the city.
- Viewpoints (map 7 Setting SPD)
 - 1 Prospect Stile

- 3 Lansdown Crescent
- 4 Approach Golf Course
- 20 Primrose Hill
- Historic Views (map 9 Setting SPD)
- 4a The Avon Valley (west)
- 8 Lansdown
- Road Viewpoints (map 14 Setting SPD)
 - K2 and K3 Upper Bristol Road/Bitton
- Historic sites and features
 - Kelston Park – grade II* listed building and RPG
 - Newton Park – grade I listed building and grade II* RPG
 - Pennyquick/Whiteway Road (Frome Road)

3.34 The OUV conveyed by this attribute derives from the deliberate, conscious design of the city. This is most evident in choreographed views of buildings and the cityscape, and its harmonious relationship with the surrounding landscape. These views across the city intentionally took advantage of the topography and character of the surrounding landscape to enhance the city's beauty and embody the picturesque design principles that influenced its design.

3.35 In most of these views the area is not a critical factor – it has not been manipulated to form a component of the composition and is not the focal point of it either. Instead, its contribution in relation to this attribute is more incidental, as part of the rural landscape backdrop to the subject of the view or, for those views intended to be more generalised, as part of the panorama. However, it has not been identified as part of the green hillsides forming prominent features of the landscape setting of the WHS (map 5 of the SPD). As such, it conveys the attribute less strongly than other parts of the setting that appear more prominently in views from and in conjunction with the city.

3.36 Due to the area's location and topography, it is views looking south-west across the city from viewpoints on its northern hills and views toward the city from the west that it most often forms part of. Where it appears in these views, it is its undeveloped, rural appearance juxtaposed with the stark built form of the city that adds to the depth and beauty of the views and emphasises the relationship between city and countryside. This includes those along the historic western routes into and out of the city such as K1/K3 Upper Bristol Road/Bitton road viewpoints, and Whiteways Road/Pennyquick Road.

3.37 Whiteways Road lies to the east of the assessment unit and follows the line of the medieval Frome Road, later a turnpike road. It links the western and southern entrances to the city at New Bridge and Odd Down. This route through rural countryside to meet the boundaries of the city has shaped visitors' experience of Bath for centuries. The later expansion of the city at Twerton and Whiteway has moved the city boundary further out into the rural surroundings. Now the road marks a decisive transition point: city to the east, countryside to the west. Views along this road allow for the approaches and boundary of the city and its relationship with the surrounding landscape to be appreciated. The area appears in these views in a form much as it has for centuries, adding to the authenticity of the attribute.

3.38 Given the above, the physical characteristics of the area as rural, undeveloped space and the contribution this makes in views along routes around and approaching the city, as well as the backdrop in views of the city, is fundamental to its contribution to the attribute. Even though it is technically within the WHS property boundary, its location beyond the city limits places its character firmly as rural countryside that surrounds the city, rather than being green space consciously incorporated into the fabric of the city itself. Whilst this fortuitous role limits its contribution to an attribute that is principally concerned with the conscious arrangement of buildings, green space and landscape, it nevertheless contributes to the overarching vision to create a beautiful city. This is most evident in its contribution to the experience on entering, leaving and circumnavigating the city to the west.

3.39 The overall contribution of the assessment unit to the headline attribute is medium.

The Green Setting of the City in a Hollow in the Hills

3.40 The headline attribute is conveyed through the following sub-attributes:

- 42. The compact and sustainable form of the city contained within a hollow of the hills.
- 43. The distinct pattern of settlements, Georgian houses and villas in the setting of the site, reflecting the layout and function of the Georgian city.
- 44. Green, undeveloped hillsides within and surrounding the city.
- 46. Open agricultural landscape around the city edges, in particular grazing and land uses which reflect those carried out in the Georgian period.

3.41 Receptors for this attribute include:

- The character and appearance of the assessment unit itself as undeveloped green countryside on the edge of the city.
- Viewpoints (map 7 Setting SPD)
 - 1 Prospect Stile
 - 3 Lansdown Crescent
 - 4 Approach Golf Course
 - 20 Primrose Hill
- Historic Views (map 9 Setting SPD)
 - 4a The Avon Valley (west)
 - 8 Lansdown
- Road Viewpoints (map 14 Setting SPD)
 - K2 and K3 Upper Bristol Road/Bitton
- Historic sites and features

- Kelston Park – grade II* listed building and RPG
- Newton Park – grade I listed building and grade II* RPG
- Newton St Loe – conservation area
- Corston – conservation area
- Pennyquick/Whiteway Road (Frome Road)
- Claysend Farmhouse – grade II

3.42 The OUV conveyed by this attribute derives from the spatial, visual and functional relationship Bath has with the surrounding landscape. It is entirely dependent on the physical properties of that landscape as undeveloped, rural, green countryside. This is evident in views from within the property boundary that take in both the city and the landscape, as they illustrate the symbiotic relationship between built and natural form. However, views within the setting either towards the city or contained within the setting are equally important in conveying this attribute by reinforcing the immediacy and intimacy of countryside and city. This contribution stems from the appearance, use (agricultural and leisure) and perception of the landscape as the rural hinterlands of the city.

3.43 The open agricultural landscape around the city edges is felt especially keenly in area 2. The later expansion of the city at Whiteway and Twerton butts up against the eastern edge of the area. This expansion is contrary to the character of the city as compact and contained within the hollow. However, the development has not breached the road and the area remains distinctly rural in character. This agricultural use has for centuries helped define and distinguish the countryside setting of the city from the dense urban core.

3.44 The degree of separation it provides between city and associated but outlying buildings and estates also contributes to our understanding of the layout and function of the Georgian city. The area sits between the city boundary and separate, isolated farmsteads, estates and settlements such as Claysend Farmhouse, Newton Park and Newton St Loe and is visible from Kelston Park. The legibility of receptors such as this within an agricultural

setting helps to convey the distinct historic pattern and character of rural development within the landscape. The low-density, more organic and open form of settlement within the setting of the city contrasts with the formal, high-density form of city development within the hollow.

3.45 The ability to appreciate these features as separate but related entities is emphasised by the character of the intervening landscape – that is, it is not space that has been consciously integrated into the fabric of the city but is rural in character. This helps us understand the value of the property as a historic landscape rather than a group of disparate assets. Those that date from the 18th and 19th centuries – a critical point of development for the city as we see it today – are even more significant, as they help us experience and understand it in a similar way to the Georgian resident/visitor. This illustrative contribution is not solely dependent on views. The spatial relationship, the density, ratio and distribution of asset types all add to the authenticity of the landscape and how well it conveys its past uses and connections with the city.

3.46 The overall contribution of the assessment unit to the headline attribute is high.

Overall Contribution of Assessment Unit to OUV

Table 3.3: Summary of the contribution of assessment units to attributes/OUV

Attribute	Contribution
Roman Archaeology	None
Hot Springs	None
Georgian Town Planning	Medium
Georgian Architecture	None
The Green Setting of the City in the Hollow in the Hills	High

Attribute	Contribution
Georgian Architecture Reflecting 18 th Century Social Ambitions	None
Overall contribution of the assessment unit to OUV	High

3.47 Overall, the assessment unit makes a medium contribution to the OUV of the property.

Variations in Contributions to OUV

3.48 Not applicable.

Attribute Sensitivity to Change and Potential impact

3.49 This section considers the sensitivity to change of the assessment unit, first by looking the sensitivity of each attribute, and then how each development type might affect it. Where the baseline assessment has identified that the assessment unit does not contain any receptors that convey an attribute, that attribute has not been discussed.

Georgian Town Planning Sensitivity to Change

3.50 In relation to this assessment unit, the attribute is sensitive to change that will affect its character and appearance and how it appears in views that convey this attribute. Development that changes the character of the unit from undeveloped countryside to urban development will fundamentally alter its character and the contribution it makes to the beauty of the city as part of the green backdrop in views of the historic cityscape.

3.51 The attribute is also conveyed where the assessment unit appears in views along the historic approaches to the city. These illustrate the transition from countryside into city and the way the city boundary and its landscape setting have been experienced for centuries. The attribute is sensitive to development of an urban character along these approaches. It would blur the distinct boundary between a city that has developed within and is contained by a hollow in the river valley, and the surrounding countryside and rural settlements beyond. Any development that diminishes that juxtaposition/transition will adversely affect not only the attractive and dramatic qualities of these views, but the ability to appreciate the historical importance of this crossing point into/from city to countryside.

The Green Setting of the City in a Hollow in the Hills Sensitivity to Change

3.52 In relation to this assessment unit, the attribute is sensitive to change that will affect its character and appearance and how it appears in views that convey this attribute. Development that changes the character of the unit from undeveloped countryside to urban development will fundamentally alter its character and the contribution it makes as part of the green backdrop in views of the historic cityscape, and views within the setting of the WHS that convey its rural character.

3.53 As well as changes in views, the attribute is also sensitive to changes in the settlement pattern and density, land use, and development that draws the urban form and character of the city out of the hollow in the hills and into the rural surroundings of the city.

3.54 Development that blurs the boundary between countryside and city and changes the spatial and visual containment of the city within the hollow in the hills will affect the important visual and spatial degree of separation between outlying historic features and settlements and the city.

Potential Impact of Residential Development

Table 3.4: Potential impact of residential development

Typology	Overall Potential Impact on Assessment Unit
Small scale residential (<1ha) – 2-3 storey housing (9-13m), medium density (<50dw)	High
Medium scale residential (1-5ha) – 2-3 storey housing (9-13m), medium density (<250dw)	High
Medium to large scale residential (5-10ha) – 2-3 storey housing (9-13m), medium density (<500dw)	High
Large scale residential (>10ha) – 2-3 storey housing (9-13m), medium density (<500dw)	High

3.55 Overall, there is the potential for a major adverse impact from all sizes of residential development on the ability of the assessment unit to convey the attributes.

3.56 The form of the development – the outline heights and densities – is inconsistent with the attributes conveyed by the unit and would fundamentally alter its character as the rural landscape setting to the city. It would be visible in key views across and toward the city, altering the green backdrop/foreground that conveys its rural location and contributes to its aesthetic values. It would establish development beyond the historic city limits that would affect the historic approaches and points of entry/exit to the city. It would extend the city further beyond the hollow in the hills and affect its sense of containment. It would introduce a built form that is incongruous with historic settlement patterns and building types. Consequently, any development of this type would have an adverse impact.

Level of Effect on the WHS

Table 3.5: Summary of the level of effect on the OUV of the WHS

Development Type	Overall Contribution of Assessment Unit to OUV	Overall Potential Impact on the Ability of the Assessment Unit to Convey Attributes	Level of Effect on the OUV of the WHS
Small scale residential (<1ha)	High	Major adverse	High adverse
Medium scale residential (1-5ha)	High	Major adverse	High adverse
Medium to large scale residential (5-10ha)	High	Major adverse	High adverse
Large scale residential (>10ha)	High	Major adverse	High adverse

Level of Effect on the OUV of the WHS

3.57 All residential development types have the potential to have a major adverse impact on an assessment unit that makes a high contribution to the attributes. This would result in an overall high adverse level of effect on the OUV of the WHS.

3.58 It is the principle of introducing these types of development into this assessment unit that is the main issue here. The density of residential development is an urban built form that is inherently incongruous with the attributes of the WHS. Although less tall or extensive developments may be less prominent in views, any development on the assessment unit would fundamentally alter its character and undermine the contribution the landscape setting makes to the OUV of the property. Even if the impact on views could be avoided, which is unlikely given the number of views it forms part of, the change of land use and spatial characteristics would still be harmful.

3.59 For the attributes of Georgian town planning and ‘the green setting of the city in a hollow in the hills’ there are no ways to avoid harm resulting from the development of the assessment unit. As noted above, harm will potentially be less with smaller scale development but still not avoidable. Mitigation for any residual harm (once the harm has been minimised through size/height) in the form of screening with vegetation is unlikely to be appropriate in these circumstances. Although trees are a feature of the landscape, the unit itself is open agricultural land with perimeter trees. The archaeological record for the landscape suggests land on this side of Bath has been in cultivation since at least the Roman occupation of the area. As such, the addition of trees within the fieldscape of the unit may further contribute to the change in the character of the unit as open agricultural land.

3.60 This is not to say that the assessment unit cannot take any development. Individual, bespoke buildings or small, more open grained collections of buildings would be more in-keeping with the settlement pattern and open, rural

character of the landscape and so could potentially be more easily accommodated, depending on the site. But development of the type proposed that extends the city limits and draws its urban form and character out into its rural surroundings is always going to be contrary to the attributes of OUV.

Planning Implications

National Planning Policy Framework (NPPF)

3.61 The potential high adverse level of effect on the WHS is the equivalent of substantial harm in the NPPF. As such, paragraphs 199, 200 and 201 are especially pertinent.

3.62 Paragraph 199 requires ‘great weight’ to be given to the conservation of heritage assets, with the more important the asset the greater the weight. The conservation of a WHS should therefore be given the greatest of weight. This is irrespective of the level of harm identified.

3.63 Paragraph 200 requires any harm – again, regardless of level – to have ‘clear and convincing justification’. The implication here is that there needs to be clear evidence as to the necessity for any proposal that would result in harm before any judgement can be made on acceptability. This may include, for example, whether any public benefits identified could be delivered in any other way, or the viability of a proposal. It goes on to say that substantial harm to or loss of WHSs should be ‘wholly exceptional’.

3.64 Paragraph 201 is applicable to proposals where substantial harm has been identified. When this is the case, the default position is for refusal unless it can be demonstrated that the substantial harm is necessary to achieve substantial public benefits, or that a list of four criteria are met. The criteria are principally applicable to the reuse and viability of buildings. As such, the former requirement for substantial public benefits is more likely to be appropriate in this instance.

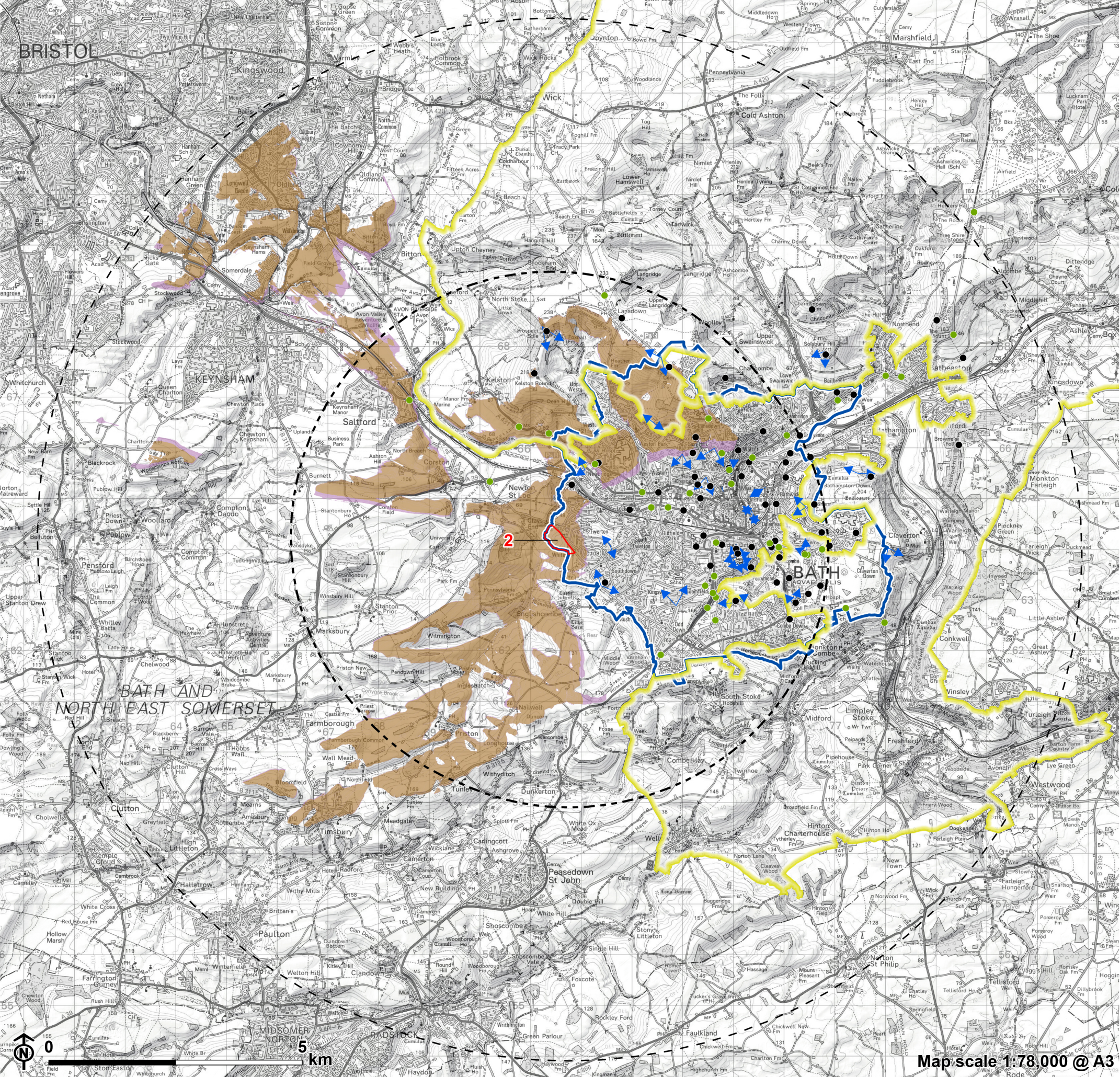
3.65 In addition to paragraphs relating to harm, paragraph 206 requires local authorities to “look for opportunities for new development within... world heritage sites, and within the setting of heritage assets, to enhance or better reveal their significance”. This policy can only be met by identifying opportunities within the areas and securing improvements for the historic environment. The lack of heritage benefits and the resultant harm from the development types means this policy could not be met through the proposed development types.

UNESCO Guidance

3.66 The potential high adverse level of effect on the WHS is the equivalent of significant negative impacts in relation to section 6.9 of the UNESCO guidance on assessment impact. Because of the in-principle issue with these types of development and the inability to avoid or mitigate the negative impact, the third bullet point in section 6.9 is likely to be applicable: “the negative impact would be significant and could not be avoided or mitigated, so the proposed action should not proceed”.

Appendix A

Viewpoint Location and ZTV Plans



ZTV for Assessment Unit 2

- Assessment unit boundary
- 5km from assessment unit boundary
- 10km from assessment unit boundary
- Cotswolds National Landscape
- City of Bath World Heritage Site
- Potential development at 9m
- Potential development at 13m
- WHS SPD Viewpoints
 - WHS SPD Historic Viewpoints
 - WHS SPD Road Viewpoints

Notes
The ZTV is calculated from a grid of points covering the extent of the Assessment unit boundary from a viewing height of 2m above ground level.

The terrain model assumes bare ground and is derived from 2m DTM (obtained from Environment Agency)

Earth curvature and atmospheric refraction have been taken into account.

The ZTV was calculated using ArcMap 10.8.1 software

Appendix B

Attributes of the City of Bath World Heritage Site

Roman Archaeology

1. The archaeological remains of the Roman temple of Goddess Sulis Minerva and baths complex built around the Iron Age Sacred Spring, including the Great Bath, East baths, Circular Bath and West Baths, with the Roman Baths still capable of being used for their original function.
2. Roman archaeological remains within the city wall (itself thought to be of Roman origin) beyond the temple and baths complex, demonstrating the extent of the city.
3. Roman and Iron Age archaeological remains beyond the city wall including hill forts, field systems, villas and funerary monuments, demonstrating the context of the Roman city.
4. The surrounding road system and street plan of the Roman city, overlain by the medieval layout and influencing the form of the Georgian city, such as London Road.
5. The culture and traditions associated with bathing and healing (recovered fragments, including Roman pewter, coins and inscribed curses, are artefacts and not themselves of OUV, but help demonstrate the function of the Baths and Temple Complex).

The Hot Springs

6. Bath as a centre of healing, the medical research and learning associated with the 'cure' of the hot waters and medical establishments developed around them including almshouses and hospitals.
7. The spiritual importance of the hot springs, the cultural use of the waters and the continuous flow of hot water from antiquity to present day.

Georgian Town Planning

8. The introduction of innovative forms of town planning including squares, crescents and circus.
9. Visual homogeneity of the city due to widespread use of local Oolitic (Bath) limestone, a limited palette of colour tones and the uniform scale and height of buildings.
10. The deliberate creation of a beautiful city.
11. Views and vistas, within the Georgian city deliberately created by awareness of context, and beyond, including such components as Prior Park and Sham Castle, designed to view, and be viewed from, the city centre.
12. The positioning, orientation and layout of Georgian buildings, for example in serpentine terraces, to use slopes and contours to create dramatic forms.
13. The design of the Georgian city to facilitate outdoor social interaction and activity, including walks, promenades, colonnades to afford weather protection, and pleasure gardens.

14. The Kennet & Avon Canal, Somerset Coal Canal and associated features.
15. The influence of Georgian town planning in Bath on subsequent developments in the UK and beyond.
16. The creation of wide, flat pavements to encourage promenading.
17. The harmonious and logical integration of individual Georgian developments, with residential terraces interspersed with public buildings such as Assembly Rooms and Pump Rooms, and multiple architects building to a common ethos rather than to an overall master-plan.
18. The principal historic road routes into the city, marking the arrival points for visitors who almost universally came by road.
19. The design of the Georgian city as a theatre set, with visual surprises and open spaces linked with one another.
20. C18th picturesque principles including the relationship of buildings to landscape, the concept of blending countryside and town, and historic parks and gardens.

Georgian Architecture

21. Transposition of Palladio's ideas to the scale of a complete city in a British setting, and employed in a wide range of building forms including houses, public buildings, Pulteney Bridge and churches.
22. Key visual landmarks within views, such as the Royal Crescent and Beckford's Tower.

Appendix B Attributes of the City of Bath World Heritage Site

23. The contrast between polite, controlled, formal facades and the informal rear of Georgian buildings.
24. The Abbey Church as a key part of the urban form of the Georgian city.
25. The works of noted architects including the John Woods, Robert Adam, Thomas Baldwin, John Palmer, John Eveleigh and John Pinch.
26. The design of terraced houses to appear as though they were a single country house or palace, demonstrating the social aspiration of occupiers to emulate the aristocracy.
27. The Georgian monumental ensembles of crescents, squares, circus and terraces forming iconic, internationally recognisable structures, where the whole is greater than the sum of the individual parts.
28. The extent Georgian redevelopment, almost totally obscuring previous mediaeval buildings and the widespread survival of this fabric leaving a unique complete example of a Georgian city.
29. Detached villas, largely in the suburbs of the city, showing the transformation of Bath toward a genteel retirement settlement at the end of the Georgian period.
30. The universal use of natural building materials in the Georgian city.
31. Widespread creation of basements and vaults to level the land below the Georgian city.
32. The widespread use of timber vertically sliding sash windows in the Georgian city, with scale and detailing that evolved over time and often closing directly onto a stone cill.

Appendix B Attributes of the City of Bath World Heritage Site

33. The use of wrought iron work to provide external features such as railings, overthrows for lanterns, etc.
34. Components of Georgian street furniture, including coal holes, basement winches, foot scrapers, lamp brackets, watchman's boxes, and similar items.
35. The high quality of craftsmanship in Georgian building construction and ornamentation.
36. The expressed hierarchy in both the exterior design of Georgian buildings, and the use spaces within, and the subsequent difference in their scale, ornamentation and decoration.
37. Shop units, coffee and ale houses, demonstrating the evolution of the retail industry in the Georgian period.
38. The ubiquitous use of chimneys and fireplaces within Georgian buildings reflecting the use of coal as a fuel source.
39. Building design adaptations such as semi-circular stair walls and ramps for the use of sedan chairs, reflecting the adaptation of architecture to cater for the needs of a spa town.
40. Many of the Georgian buildings remain in, or are capable of being used for, their original purpose.
41. Individual internal fitting out of Georgian houses behind a uniform facade, and incomplete, truncated terraces, demonstrating the speculative nature of Georgian development finance.

The Green Setting of the City in a Hollow in the Hills

- 42. The compact and sustainable form of the city contained within a hollow of the hills.
- 43. The distinct pattern of settlements, Georgian houses and villas in the setting of the site, reflecting the layout and function of the Georgian city.
- 44. Green, undeveloped hillsides within and surrounding the city.
- 45. Trees, tree belts and woodlands predominantly on the skyline, lining the river and canal, and within parkland and gardens.
- 46. Open agricultural landscape around the city edges, in particular grazing and land uses which reflect those carried out in the Georgian period.
- 47. Fingers of green countryside which stretch right into the city.
- 48. Oolitic limestone mines, quarries, outcrops and historic features including Ralph Allen's tramway, inclines and structures used to exploit the stone from which the city was constructed.

Georgian Architecture Reflecting 18th Century Social Ambitions

- 49. The patronage and vision of John Wood Senior, Ralph Allen and Beau Nash in leading the social, economic and physical re-birth of the city from a small provincial English town into an internationally famous resort.

Appendix B Attributes of the City of Bath World Heritage Site

50. Bath as a place of resort, attracting visitors from a wide geographical area, and the historical associations with the extensive list of famous and influential people who visited.

51. Custom and practices associated with 'taking the waters', including promenading.

52. Rules and etiquette developed in the polite society, largely intangible but embodied in buildings such as the Assembly and Pump Rooms.

53. The reflection of mythological, folkloric and antiquarian influences on the decorative motifs, alignments and dimensions on buildings such as the Circus.

References

- 1 [Cotswolds Conservation Board \(2016\) Cotswolds Conservation Board Position Statement – Development in the setting of the Cotswolds AONB](#)

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