

West of Bath Landscape and WHS Impact Assessment Area 3

Bath and North East Somerset Council

Final report

Prepared by LUC

January 2024



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West of Bath Landscape and WHS Impact Assessment

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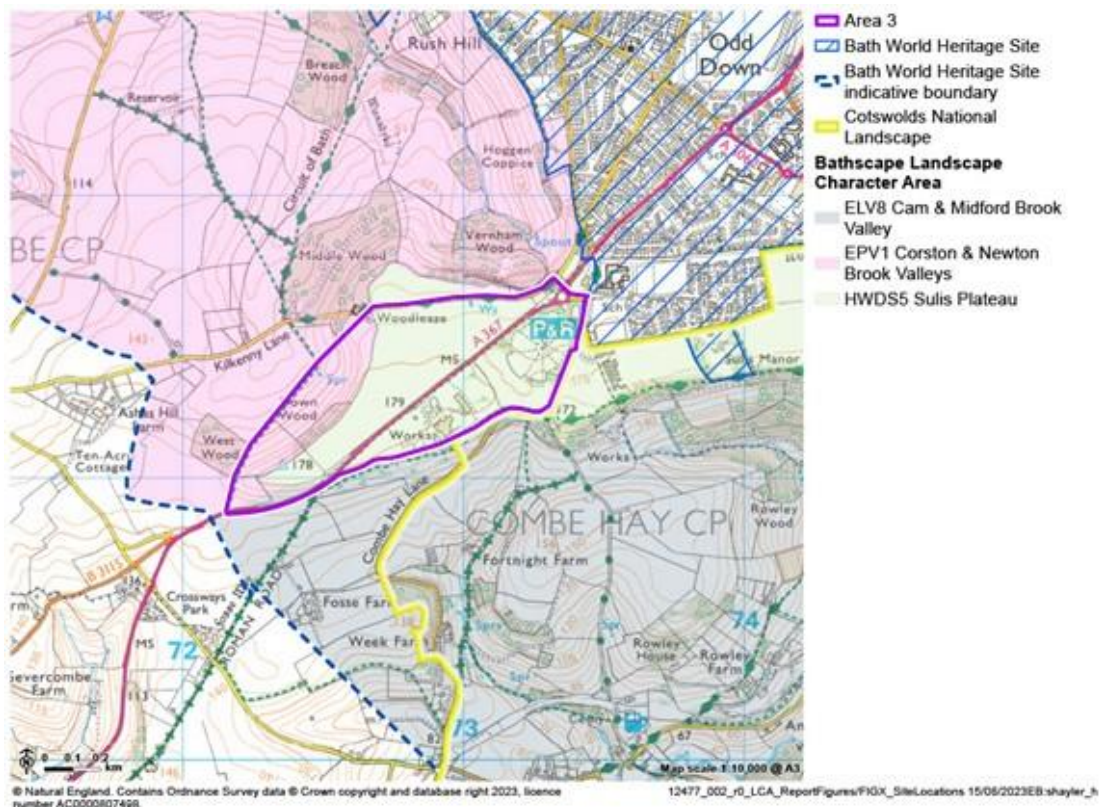
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Chapter 1

Local Landscape Character Baseline

Figure 1.1: Location of Area 3



Existing Landscape Classification

1.1 In the Bathscape Landscape Character Assessment (2017), Area 2 falls within the HWDS5: Sulis Plateau LCA (High Wold Dip-Slope LCT). A small area to the west is included in the EPV1: Corston and Newton Brook Valley LCA (Eroded Plateaus and Valleys LCT).

1.2 In the City of Bath WHS Setting SPD (2013), Area 3 is located within the Cotswold Plateau and Valleys Zone. A small area to the west is included in the Newton St Loe Plateau Zone.

Key Characteristics

- Part of an elevated, narrow plateau landscape with steep sides in the north-west and south-west.
- Clipped hedges separate the irregular-shaped arable fields of varying sizes.
- Tree cover is limited to deciduous woodland (Down Wood) on the north-west facing slope in the west of the area, and woodland surrounding Odd Down Park & Ride in the east, as well as occasional hedgerow trees.
- An urban-rural fringe landscape dissected by the A367, with arable and pastoral fields on the north-western side, and a Park & Ride and Recycling Centre on the south-eastern side.
- An open landscape to the north-west of the A367 with expansive views to the surrounding countryside including across the Newton Brook valley.

Natural Influences

Landform, Drainage, Geology and Soils

Figure 1.2: Landform and drainage of Area 3

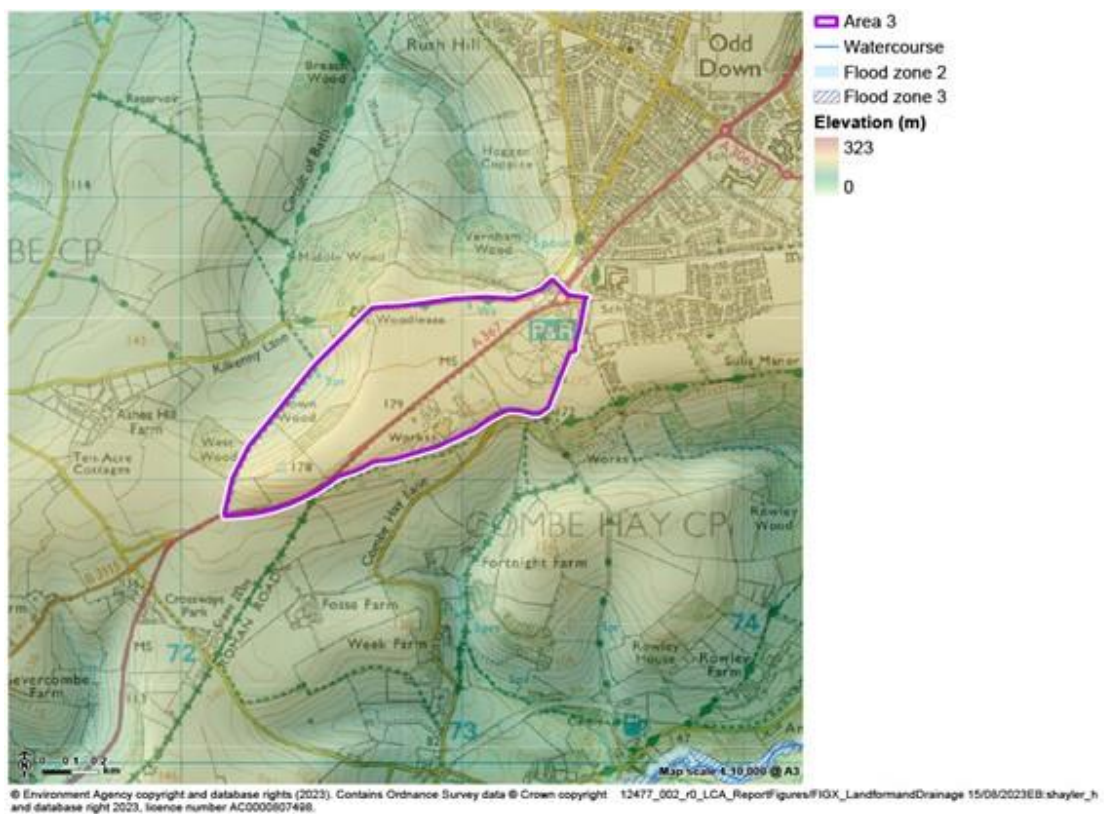


Figure 1.3: Bedrock geology of Area 3

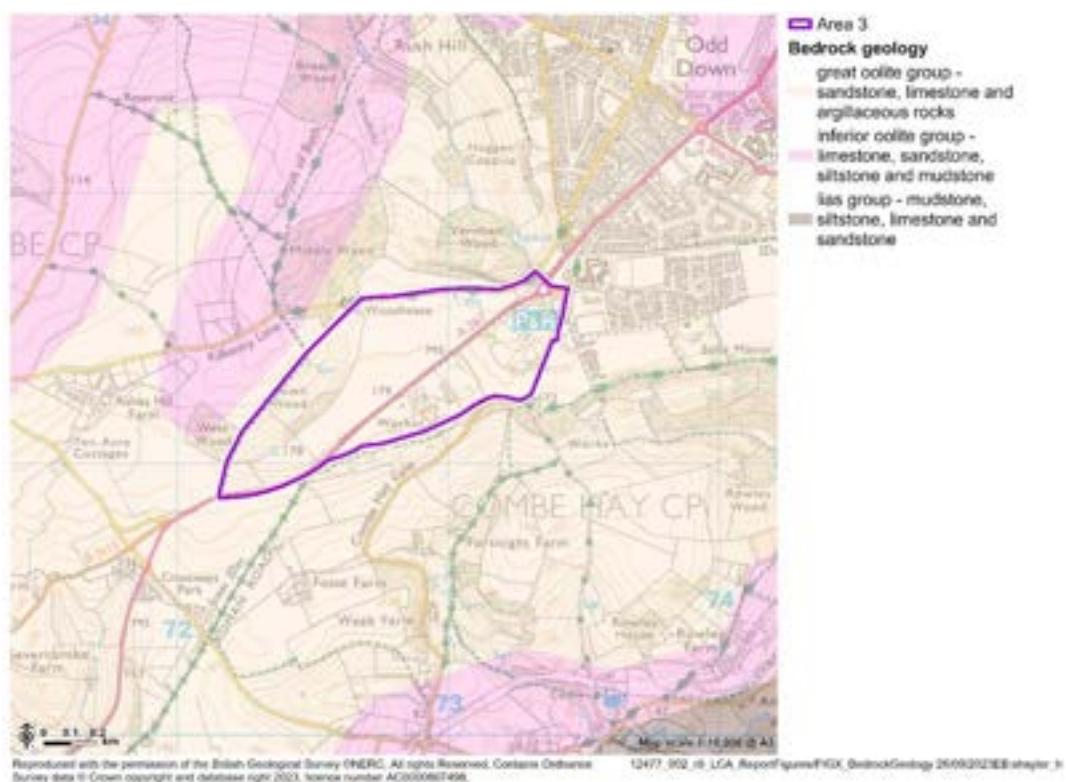
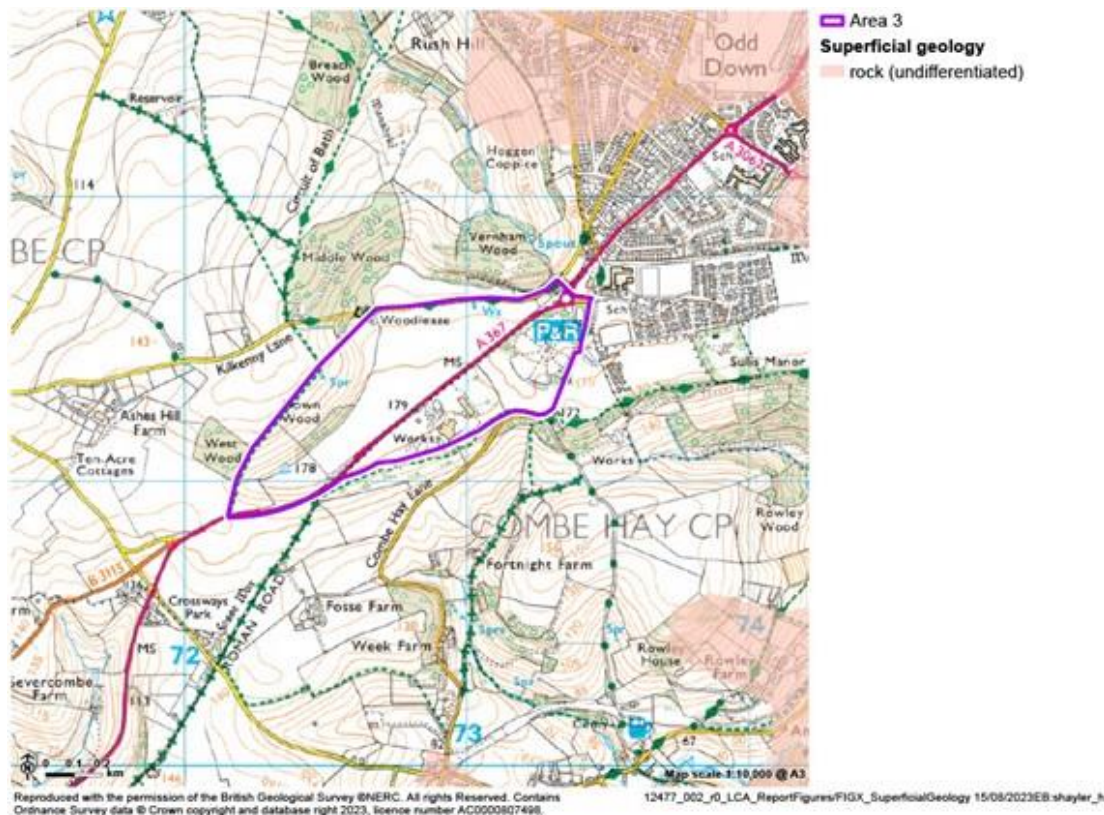


Figure 1.4: Superficial geology of Area 4



1.3 A discrete area of plateau located along the south-western edge of Odd Down in Bath, abutting the intricate slopes of the Cam Brook Valley to the south-east (within the Cotswolds National Landscape) and the expansive rolling landscape of interweaving ridges, hill and valleys to the west/north-west. The highest point of the plateau reaches 180m Above Ordnance Datum (AOD) along the A367, and the area is identified as a ‘green hillside forming a prominent feature of the landscape setting’ in the WHS SPD. The north-western and south-western edges of the area comprise steep slopes that descend from the plateau and form part of the wider valley slopes of the Newton Brook Valley and the Cam Brook Valley.

Figure 1.5: Steep slope (and Down Wood) in the north-west of Area 3, rising to the flat elevated plateau



1.4 The area is overlain by shallow lime-rich soils and lime-rich clayey and loamy soils with impeded drainage, which typically support the arable land use. There is presence of naturally high groundwater across the area. The flatter areas of the plateau are underlain by limestone (Twinhoe Member), while the steep slopes are composed of a combination of limestone and ooidal (Combe Down Oolite Member).

Semi-natural Habitats

Figure 1.6: Nature conservation designations in Area 3

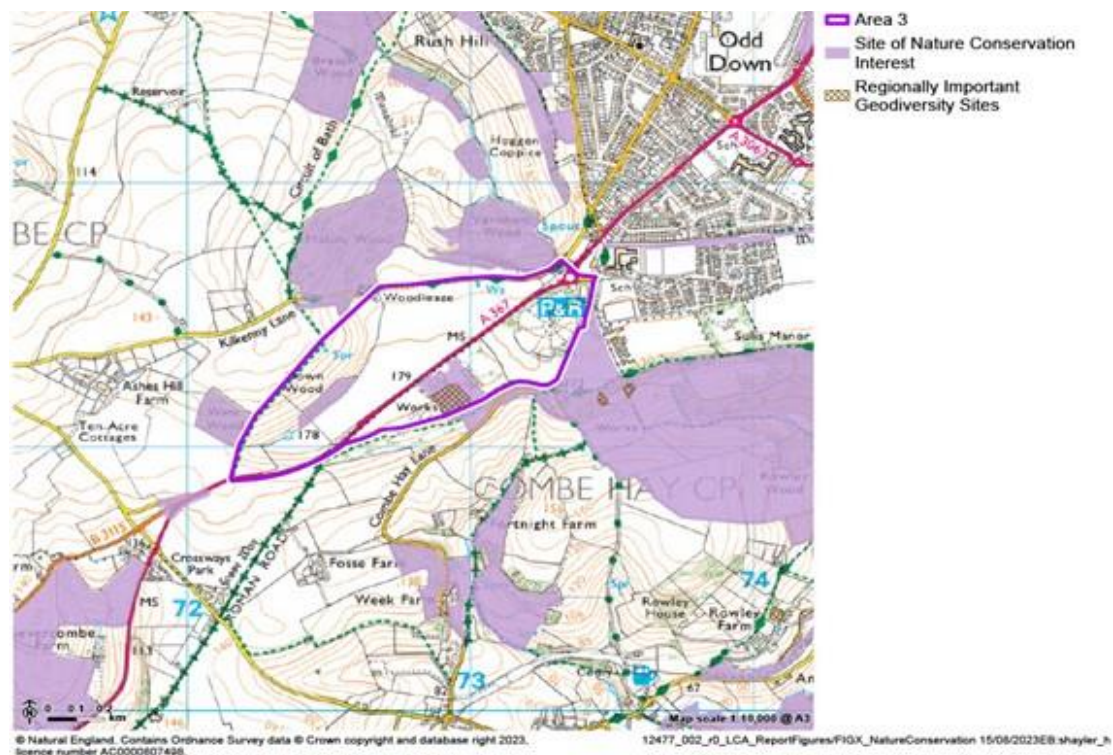
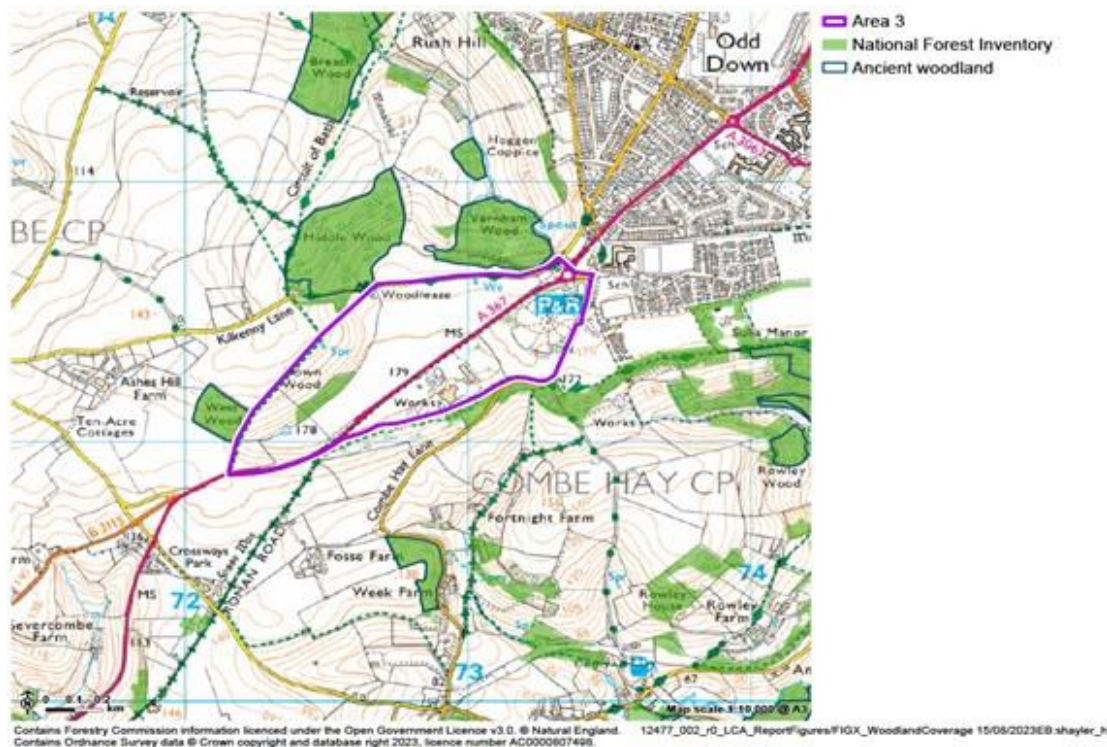


Figure 1.7: Woodland coverage of Area 3



1.5 There is little woodland or tree cover on the plateau apart from at Down Wood on the north-west facing slope in the west of the area, which is priority habitat deciduous woodland and designated as a Site of Nature Conservation Interest (SNCI). There is also woodland surrounding Odd Down Park & Ride in the east, as well as occasional hedgerow trees along field boundaries and the A367.

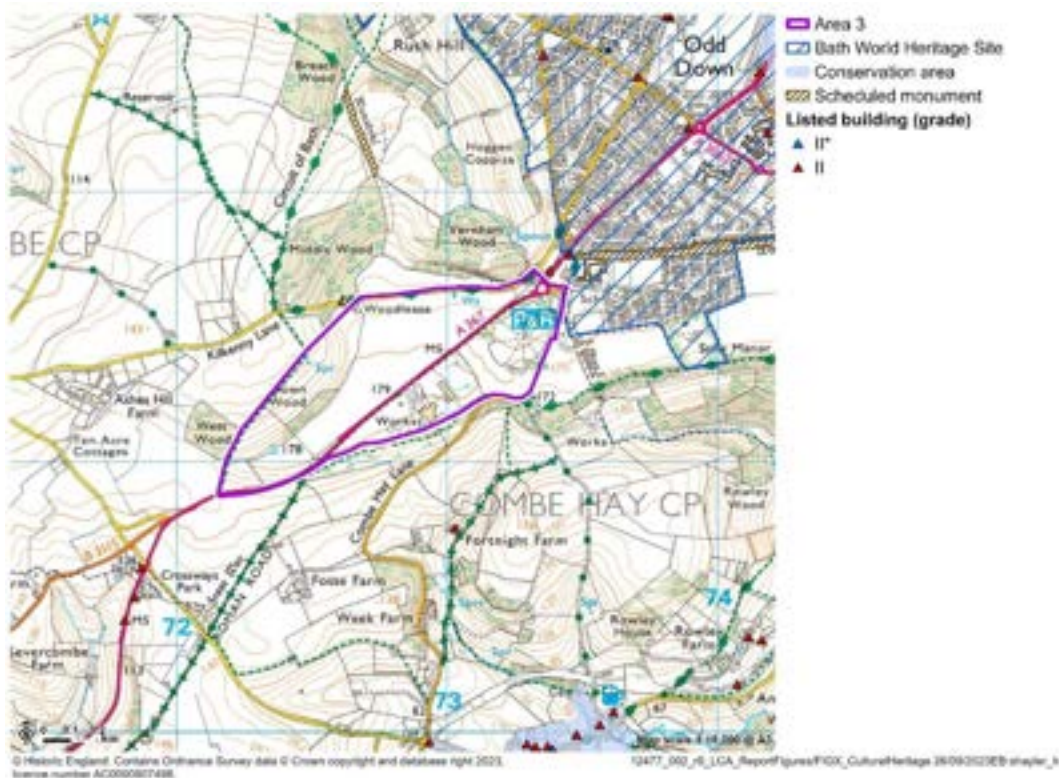
1.6 There are many verges and areas of grassland at Odd Down Park & Ride with a very rich limestone grassland/lowland meadow flora, although are not designated.

1.7 Most of the area is recognised as important to Green Infrastructure in current Local Plan Policy NE1.

Cultural Influences

Historic Features

Figure 1.8: Cultural heritage designations in Area 3



1.8 The City of Bath World Heritage Site (WHS) abuts the north-eastern edge of the area.

1.9 The Combe Hay Mine was a Fullers Earth mine which operated until 1979 and was located next door to the Odd Down Park & Ride. A few remnants buildings exist in the current recycling centre. It once contained a full-size windmill which was used to drive the machinery in the 1890s before it burnt down in 1904.

1.10 The A367 forms the route of a historic Roman road (Fosse Way).

Figure 1.9: A367 that crosses through the middle of Area 3 and entrance to the Fullers Easrth Recycling Centre



Land Use and Landscape Pattern

1.11 The A367 dissects the area into two distinct parts. The plateau to the north-west of the A367 comprises 18th-19th century enclosure arable fields, owned by the Duchy of Cornwall, with pasture on the steep north-west facing slope beyond. The fields within the area are generally irregular in shape, bound by clipped hedgerows and vary in size. The Odd Down Park & Ride and Fullers Earthworks Recycling Centre are located to the south-east of the A367.

Figure 1.10: Arable plateau to the north-west of the A367



Figure 1.11: Fullers Earthworks Recycling Centre



Settlement Pattern, Road Pattern and Recreation

1.12 There are no settlements within the area. However, it marks the outer limits of Bath's southernmost suburb at Odd Down, and along with the Odd Down Park & Ride and the Fullers Earthworks Recycling Centre, results in having an urban fringe character.

Figure 1.12: Settlement edge of Odd Down



1.13 The A367 (Radstock to Bath) runs diagonally across the plateau and is a significant feature that adds both movement and noise to the surrounding landscape. Kilkenny Lane defines the northern boundary of the area, and a part of Combe Hay Lane defines the eastern boundary.

1.14 The area is surrounded by public rights of way (PRoWs). A public footpath runs along the dip slope and the western and south-western boundaries of the area. The Circuit of Bath promoted route runs partly along Kilkenny Lane (along the northern boundary of the area) and Combe Hay Lane (along the eastern boundary of the area). Near the junction of the two lanes, the Circuit of Bath meets the historic Wansdyke route. Another public footpath extends from Combe Hay Lane and follows most of the southern boundary where it meets the historic Fosse Way.

Perceptual Influences

Perceptual Character

Figure 1.13: Tranquillity of Area 3

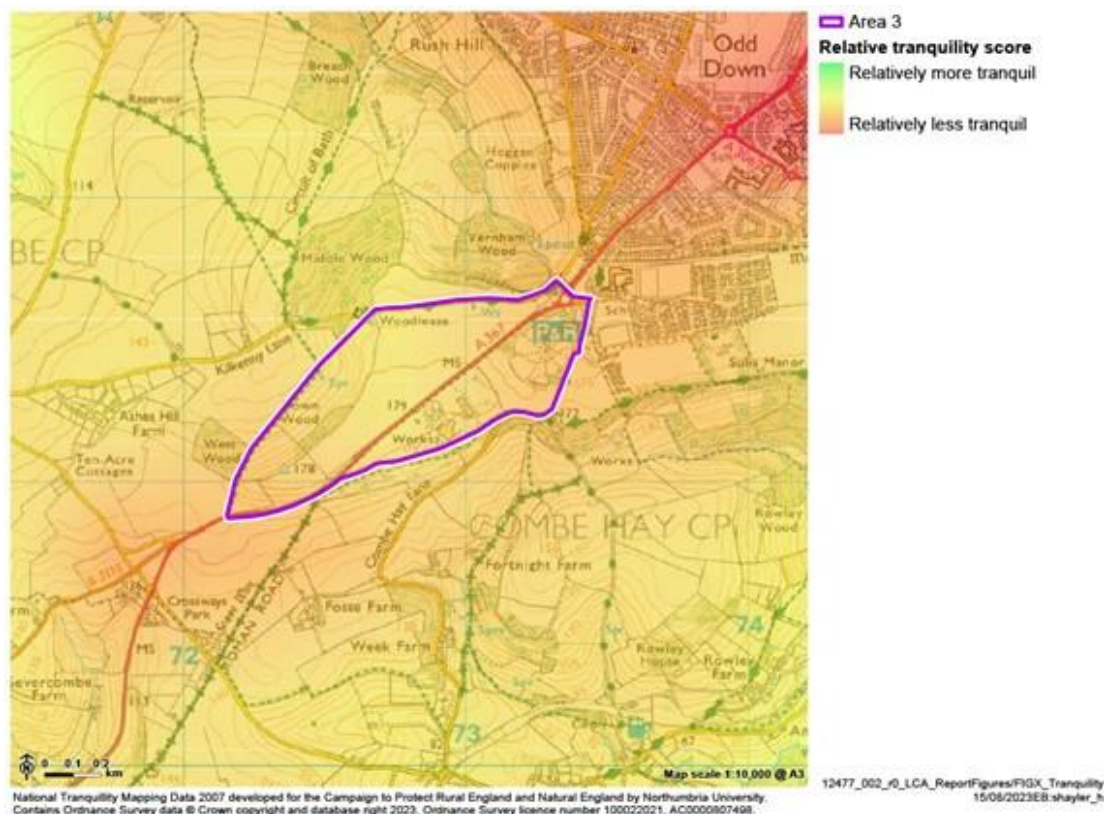
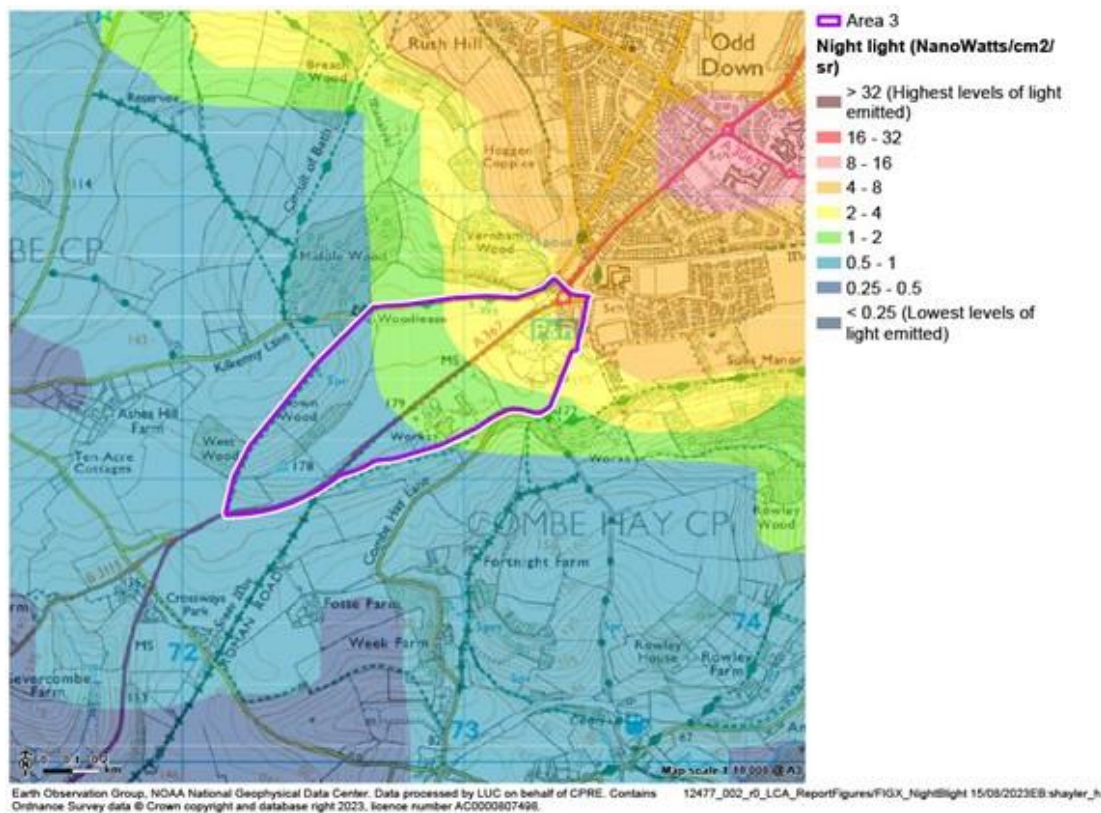


Figure 1.14: Dark skies of Area 3



1.15 The edge of Odd Down, the A367, Odd Down Park & Ride and the Fullers Earthworks Recycling Centre detract from rural tranquillity. The agricultural area to the north-west of the A367 experiences less disruption, and the open and rural countryside beyond contributes to a strong sense of tranquillity within this part of the area. Lighting from the settlement edge of Odd Down and the Park & Ride disrupts the experience of dark skies in the north-east of the area.

Visual Character

1.16 To the north-west of the A367 the area is open, with expansive views to the surrounding countryside (including across the Newton Brook Valley to the north) afforded from the public footpath that runs along the north-western boundary. Views extend to the Cotswolds Escarpment in the north, including

glimpsed views from the Circuit of Bath promoted route which runs along the northern boundary of the area.

Figure 1.15: Open fields of Area 3 with views extending out towards the Cotswold Escarpment



1.17 The landscape is more enclosed to the east of the A367 with mature vegetation restricting views out. The Odd Down Park & Ride is dominated by cars and activity but is visually well-filtered by surrounding trees. The Fullers Earthworks Recycling Centre is also partly filtered by surrounding vegetation although glimpsed views are possible through gaps in vegetation. The old Fullers Earthworks structures can also be partly seen on the skyline above the vegetation, when viewed from PRowWs to the south-east.

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

1.18 Area 3 lies immediately to the south-west of Bath and lies within the 'Indicative Extent of the Setting of the City of Bath WHS'. The area is recognised as contributing to the landscape setting of Bath (Policy NE2A). The city is largely hidden when viewed from the area due to intervening topography and vegetation. However, the northern suburb of Weston can be seen in distant views extending up the slopes of the bowl landform (which contains most of the city), and there are close glimpsed views of buildings on the edge of Odd Down through gaps in vegetation. The area forms part of the green backdrop to the WHS with the A367 providing a rural approach to the city.

1.19 The Cotswolds National Landscape is located immediately to the south-east of Area 3, comprising the intricate wooded valley of the Cam Brook, and the area forms part of the rural surroundings to the nationally protected landscape. Limited views are available from the Cotswolds National Landscape across the plateau of the area due to the intervening wooded valley slopes of the Cotswolds National Landscape itself. The Cotswold Escarpment is located over 5km to the north of Area 3 above the River Avon, and distant views are afforded from it, including from the Cotswolds Way.

Key Views Identified by the City of Bath WHS Setting SPD

1.20 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 of 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 Avon valley and hills beyond to the south. Area 3 is visible on the horizon, approximately 7km 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. Area 3 can be seen on the horizon, approximately 6km away.
- Viewpoint 10 – Little Solsbury Hill: An Iron Age hill fort existing in Roman times. It is a popular public viewing point which shows Georgian buildings in the context of the surrounding hills. Extensive panoramic views are afforded which show the built city, down the Avon valley and of the surrounding countryside of woods, trees and greenery. Area 3 can be seen on the horizon, approximately 7.5km away.
- Viewpoint 13 – Twerton Roundhill: An important historical feature that is now a popular public viewpoint on the south of the city with 360 degree views including the Newton Brook Valley and open undulating rural landscape to the south and west. There are glimpses of Area 3 (approximately 1.8km away) seen on the horizon between intervening vegetation.
- Viewpoint 20 – Primrose Hill: On the route of the Cotswold Way, this public viewpoint overlooking the city has been significant since the 18th and 19th centuries. Beyond the city, the surrounding countryside to the west provides the backdrop. There are glimpses of Area 3 (approximately 5km away) seen on the horizon between intervening vegetation.
- 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 and hills beyond now provide part of the rural surroundings to the park, including Area 3 which is seen on the horizon approximately 5.5km away. There are also similar views 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 Penn Hill, 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 narrow, elevated plateau with a sense of openness in the north-west, contrasting against the surrounding lower-lying valleys of the Newton Brook and Cam Brook.
- The woodland along the dip-slope at Down Wood is an important landscape feature (designated as SNCI).
- The rich limestone grassland/lowland meadow flora at Odd Down Park & Ride contribute to the ecological value of the area.
- The arable and pastoral hedged fields and absence of settlement contribute to rural character, particularly away from the busy transport corridor of the A367 in the north-west.

- The woodland surrounding the Park & Ride filters it from view and contributes to rural character.
- Recreational value of the PRowS including the Circuit of Bath promoted route along Kilkenny Lane and Combe Hay Lane.
- An open landscape to the north-west of the A367 with uninterrupted views across the Newton Brook Valley and glimpsed views extending northwards towards the Cotswold 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 nine 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 Cotswolds 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 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 consider 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 3a and 3b

Landscape Sensitivity Assessment

Figure 3.1: Location of Assessment Unit 3a and 3b

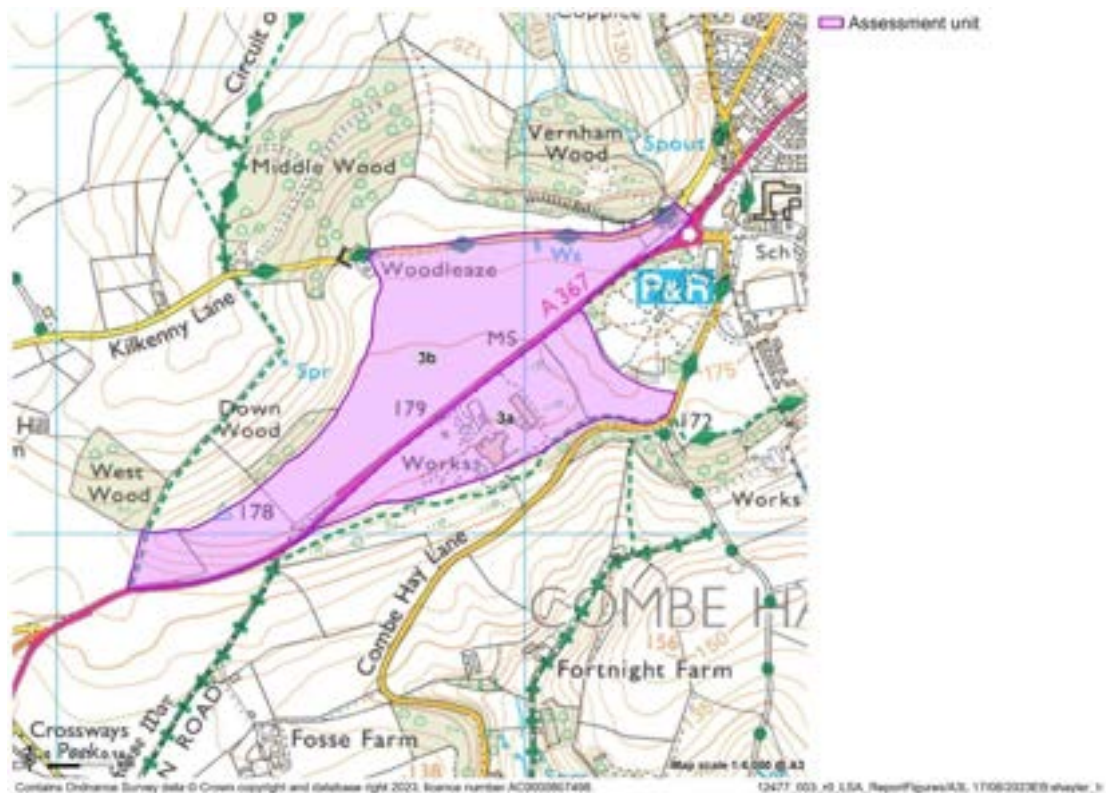


Figure 3.2: View across parcel 3b from the A367



Figure 3.3: Fullers Earthworks Recycling Centre in parcel 3a, partly filtered by vegetation



Commentary Against Landscape Sensitivity Indicators

Landform

3.1 The assessment unit forms part of a narrow plateau landscape. It is identified as a 'green hillside forming a prominent feature of the landscape setting' in the WHS SPD.

- Parcel 3a is located on the flatter landform of the plateau.
- Parcel 3b includes steep slopes in the south-west, forming a relatively distinctive landform feature that overlooks the abutting valley landscape.

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

Openness and Enclosure

3.3 The assessment unit has a semi-enclosed character.

- Parcel 3a is more enclosed and is contained by Odd Down Park & Ride to the north-east, woodland along Combe Hay Lane to the east and mature vegetation lining the A367 to the west. Buildings and earthworks associated with the recycling centre also provide screening.
- Parcel 3b is relatively open and affords expansive views to the surrounding countryside (including across the Newton Brook Valley to the north) with Down Wood creating some localised enclosure to the west.

3.4 Overall, under this criteria the landscape is of moderate sensitivity to smaller-scale potential development types assessed for this unit (small-scale residential) and those developments being assessed within parcel 3a (transport interchange and waste transfer). However this increases to high sensitivity for larger-scale development types (medium to large scale residential) expanding over both parcels and the business park development assessed in parcel 3b only.

‘Natural’ Character

3.5 The assessment unit comprises an intensively farmed landscape with areas of development resulting in few semi-natural features.

- Odd Down Park & Ride in Parcel 3a has many verges and areas of grassland with rich limestone grassland/lowland meadow flora, and is surrounded by woodland.
- Down Wood (priority habitat deciduous woodland and SNCI) is located along the edge of Parcel 3b, on the dip slope to the west.

3.6 Overall, the 'natural' character is of low sensitivity to all potential development types assessed for this unit.

Landscape Pattern and Time Depth

3.7 The assessment unit comprises an urban-rural fringe landscape dissected by the A367.

- Parcel 3a is dominated by the recycling centre, and Odd Down Park & Ride to the north-east with little remaining of the historic field pattern.
- Parcel 3b comprises three arable fields that vary in size and shape, bound by clipped hedgerows resulting from 18th-19th century enclosure, although with some modern amalgamation.

3.8 Overall, the landscape pattern and time depth is of moderate sensitivity to all potential development types assessed for this unit.

Historic Features

3.9 There are relatively few visible historic features that contribute to landscape character, except for the A367 which forms the route of a historic Roman road (Fosse Way) and cuts across the assessment unit. However, the busy nature of the road detracts from landscape character. There are also remnants of Combe Hay Mine (operational until 1979) in the current recycling centre (parcel 3a) but are not clearly visible.

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

Settlement Form and Edge

3.11 The urban-rural fringe landscape of the assessment unit marks the outer limits of Bath's southernmost suburb – Odd Down.

- The built development within parcel 3a (Odd Down Park & Ride and the Fullers Earthworks Recycling Centre) exert an industrial influence on the landscape on the edge of Bath, although both are partially filtered by woodland.
- The open fields of parcel 3b provide a rural approach and backdrop to Bath, making a positive contribution to the character of the settlement edge.

3.12 Overall, the settlement form and edge is of moderate sensitivity to smaller-scale potential development types assessed for this unit (small-scale residential) and those developments being assessed within parcel 3a (transport interchange and waste transfer). However, this increases to high sensitivity for those larger-scale development types (medium to large scale residential) expanding over both parcels and the business park development assessed in parcel 3b only.

Recreational Value

3.13 The assessment unit is publicly inaccessible by footpath but bordered by PRow's, including the promoted Circuit of Bath which runs along the northern and eastern boundary.

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

Perceptual Character

3.15 The Park & Ride to the north-east and the Fullers Earthworks Recycling Centre in parcel 3a, and nearby settlement edge of Odd Down, exert an urban influence on the landscape. The A367 further influences the landscape, with localised effects on dark skies and tranquillity.

3.16 The open and undeveloped nature of parcel 3b contributes to the sense of rural character.

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

Visual Character

Views of the Assessment Unit

3.18 The ZTV (in Appendix A) indicates that the extent of visibility is similar from potential development of up to 6m, 9m and 13m.

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

- Roads and footpaths along the boundary of the assessment unit, including the Circuit of Bath promoted route that partly runs along Kilkenny Lane along the northern boundary and Combe Hay Lane along the south-eastern boundary.
- The footpaths crossing the Newton Brook Valley to the north-west.
- The A367 road running across the plateau.
- Roads and footpaths over 5km away on the valley slopes to the north, including the Cotswold Way National Trail (particularly from elevated

viewpoints at Penn Hill, Dean Hill and 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.
- Public open spaces at elevated locations within Bath where there are distant southward and south-westward views over towards the plateau landscape of the assessment unit. This includes locations such as Prospect Stile, Beckford's Tower and Lansdown Cemetery, Little Solsbury Hill, Twerton Roundhill and Primrose Hill (Viewpoints 1, 2, 10, 13 and 20).

Views from the Assessment Unit

3.20 The landscape of the assessment unit is partly open with important visual relationships with surrounding areas, including distant views from the Cotswolds National Landscape.

3.21 Potential development on the assessment units may obscure views of:

- The Cotswold Escarpment, which forms a prominent green backdrop rising from the River Avon over 5km to the north.
- The house at Kelston Park, which provides a local landmark.

3.22 Overall, the visual character is of high sensitivity to most potential development types assessed for this unit. However, this would reduce to medium sensitivity for those development types (small, medium scale transport interchange, waste transfer/recycling centre) assessed in Parcel 3b, where there is less intervisibility with the surrounding areas.

Setting of the Cotswolds National Landscape

3.23 The landscape of the assessment unit has little intervisibility with the Cotswolds National Landscape located to the south-east of Area 3, due to intervening wooded valley slopes. However, from the open plateau of parcel 3b, there is a distant visual relationship with the Cotswolds escarpment, which lies 5.5km to the north.

3.24 Overall, the setting of the Cotswolds National Landscape is of moderate sensitivity to all potential development types for this unit. However, this would reduce to low sensitivity for those development types assessed in parcel 3b (small, medium, medium-large scale transport interchange, waster transfer/recycling centre), where the enclosed character of the landscape could provide screening to these development types.

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)	Moderate	Moderate	Low	Moderate	Low	Moderate	Low	Low	High	Moderate
Medium scale residential (1-5ha)	Moderate	High	Low	Moderate	Low	Moderate	Low	Low	High	Moderate
Medium to large scale residential (5-10ha)	Moderate	High	Low	Moderate	Low	High	Low	Low	High	Moderate
Large scale residential (>10ha)	Moderate	High	Low	Moderate	Low	High	Low	Low	High	Moderate
Purpose built student accommodation (PBSA)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Small scale business park (<1ha) (Parcel 3b only)	Moderate	High	Low	Moderate	Low	High	Low	Low	High	Moderate
Medium scale business park (1-5ha) (Parcel 3b only)	Moderate	High	Low	Moderate	Low	High	Low	Low	High	Moderate
Medium to large scale business park (5-10ha) (Parcel 3b only)	Moderate	High	Low	Moderate	Low	High	Low	Low	High	Moderate
Large scale business park (>10ha) (Parcel 3b only)	Moderate	High	Low	Moderate	Low	High	Low	Low	High	Moderate

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 transport interchange (Park & Ride) (<1ha) (Parcel 3a only)	Moderate	Moderate	Low	Moderate	Low	Moderate	Low	Low	Moderate	Low
Medium scale transport interchange (Park & ride) (1-5ha) (Parcel 3a only)	Moderate	Moderate	Low	Moderate	Low	Moderate	Low	Low	Moderate	Low
Medium to large scale transport interchange (Park & Ride) (5-10ha) (Parcel 3a only)	Moderate	Moderate	Low	Moderate	Low	Moderate	Low	Low	Moderate	Low
Large scale transport interchange (Park & Ride) (>10ha) (Parcel 3a only)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Waste transfer/recycling centre (1.75-2ha) (Parcel 3a only)	Moderate	Moderate	Low	Moderate	Low	Moderate	Low	Low	Moderate	Low

3.25 The urban-rural fringe landscape of the assessment unit is limited in natural and historic features and is afforded with some enclosure (in parcel 3a) from mature vegetation and surrounding landform. Its rural character is influenced locally by the busy A367 and Fullers Earthworks Recycling Centre within it, as well as the adjacent Odd Down Park & Ride and settlement edge of Odd Down, which reduces sensitivity to development. There is also potential for mitigation in this area through woodland planting, without detracting from the open landscape character of the wider plateau. Woodland in this assessment unit could provide connectivity with existing woodland surrounding the recycling centre and Odd Down Park & Ride, and along the dip slope to the north and north-west.

3.26 However, the distinctive elevated plateau, 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, increase its sensitivity. The partly open character of parcel 3b along the plateau and 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 southward and south-westward facing views within the city, also increase sensitivity to development.

Variations in Landscape Sensitivity

3.27 The sensitivity is increased in parcel 3b as there is a stronger sense of openness as it forms part of the wider countryside. It provides a rural backdrop to the outer limits of Bath's southernmost area (Odd Down) and the Circuit of Bath (which is of high recreational value) and the Cotswold Escarpment (within the nationally protected Cotswolds National Landscape). It also provides a green edge to Bath.

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)	Low to Medium
Medium scale residential (1-5ha) – 2-3 storey housing (9-13m), medium density (<250dw)	Medium to 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

3.28 Overall, the assessment unit is judged to have a low-moderate sensitivity to small-scale (<1ha) residential development which could physically be accommodated within parcel 3a (to the north-east of the recycling centre). The urban-rural fringe character that is influenced by the A367, Fullers Earthworks Recycling Centre as well as the adjacent Odd Down Park & Ride and settlement edge of Odd Down, and the enclosed character lowers sensitivity, particularly where it is filtered by the surrounding woodland and the treed route of the A367. This would rise to moderate sensitivity for the same development type within parcel 3b, where the flat plateau is more open in character, and has intervisibility with elevated areas within the Cotswolds National Landscape to the north and provides a rural backdrop to the Circuit of Bath promoted route.

3.29 The assessment unit is judged to have a moderate-high sensitivity to medium scale (1-5ha) residential development, as development of this size would encroach into the more open plateau in parcel 3b. This parcel demonstrates a number of characteristics which increase sensitivity, due to its visual openness, and intervisibility with elevated areas within the Cotswolds National Landscape to the north and the rural backdrop the landscape provides to the Circuit of Bath promoted route.

3.30 The assessment unit is judged to have a high sensitivity to medium-large scale (5-10ha) and large scale (>10ha) residential development, as development of this size would increasingly encroach into the more open area of parcel 3b. Larger scale development in this assessment unit, would also negate the role of the area as a rural approach and green edge to Bath.

Landscape Sensitivity to Potential Waste Transfer Station/Recycling Centre Development

Table 3.3: Overall sensitivity of the assessment unit to waste transfer station/recycling centre development (parcel 3a only)

Typology	Sensitivity
Waste transfer station/recycling centre (in parcel 3a only) – 9m	Low to Medium

Summary

3.31 Overall, parcel 3a is judged to have a low-moderate sensitivity for waste transfer station/recycling centre development, whether this is a new facility or an extension to the existing recycling centre. The parcel is heavily influenced by the Fullers Earthworks Recycling Centre and urban influence from the A367 and adjacent Odd Down Park & Ride to the north-east and is enclosed by mature

vegetation including woodland. Sensitivity is slightly increased by the semi-improved neutral grassland on the site of the existing recycling centre which is a SNCI.

Landscape Sensitivity to Potential Business Park Development

Table 3.4: Overall sensitivity of the assessment unit to Business Park development (parcel 3b only)

Typology	Sensitivity
Small scale Business Park (in parcel 3b only) (<1ha) – 2 storey pavilion buildings (13m), low levels of surface car parking, well treed or parkland setting	High
Medium scale Business Park (in parcel 3b only) (1-5ha) – 2 storey pavilion buildings (13m), low levels of surface car parking, well treed or parkland setting	High
Medium to large scale Business Park (in parcel 3b only) (5-10ha) – 2 storey pavilion buildings (13m), low levels of surface car parking, well treed or parkland setting	High
Large scale Business Park (in parcel 3b only) (>10ha) – 2 storey pavilion buildings (13m), low levels of surface car parking, well treed or parkland setting	High

Summary

3.32 Parcel 3b is judged to have a high sensitivity to small-scale (<1ha), medium-scale (1-5ha), medium-large scale (5-10ha) and large-scale (>10ha) business park development, as development of any size would increasingly encroach into the open areas of the plateau. This parcel demonstrates a number of characteristics that increase sensitivity, due to its visual openness, and intervisibility with elevated areas within the Cotswolds National Landscape

to the north, and the rural backdrop the landscape provides to the Circuit of Bath promoted route. Development in parcel 3b would also negate the role of the area as a rural approach and green edge to Bath.

Landscape Sensitivity to Potential Transport Interchange (Park & Ride) Development

Table 3.5: Overall sensitivity of the assessment unit to Transport Interchange (Park & Ride) development (parcel 3a only)

Typology	Sensitivity
Small scale Transport Interchange (Park & Ride) (in parcel 3a only) (<1ha) – 2 storey pavilion buildings (6m), low level surface car parking, well treed or parkland setting	Low to Medium
Medium scale Transport Interchange (Park & Ride) (in parcel 3a only) (1-5ha) – 2 storey pavilion buildings (6m), low level surface car parking, well treed or parkland setting	Low to Medium
Medium to large scale Transport Interchange (Park & Ride) (in parcel 3a only) (5-10ha) – 2 storey pavilion buildings (6m), low level surface car parking, well treed or parkland setting	Low to Medium
Large scale Transport Interchange (Park & Ride) (in parcel 3a only) (>10ha) – 2 storey pavilion buildings (6m), low level surface car parking, well treed or parkland setting	N/A

Summary

3.33 Overall, parcel 3a is judged to have a low-moderate sensitivity to small scale (<1ha), medium scale (1-5ha) and medium-large scale (5-10ha) Transport Interchange (Park & Ride) development, which would form an extension to the existing Odd Down Park & Ride to the north-east. The parcel is heavily influenced by the Fullers Earthworks Recycling Centre and urban influence from

the A367 and adjacent Park & Ride and is enclosed by mature vegetation including woodland. Sensitivity is slightly increased by the semi-improved neutral grassland on the site of the existing recycling centre which is a SNCI.

3.34 There is no capacity for a 10ha site or larger within this parcel.

Mitigation and Enhancement Opportunities

3.35 Development could have a high impact on the landscape of parcel 3b, to the north west of the A367, due to the open character of the plateau, which offers little potential for mitigation and where vegetative screening would be ineffective in screening development from locations on surrounding higher ground. Higher buildings would be particularly visible in the open landscape.

3.36 The enclosed landscape of parcel 3b, to the south of the A367, has a higher potential for mitigation, where new development can be screened by the landform, as well as existing and additional planting.

Landscape Character and Features

Potential Effects

- Development could have a high impact due to the open character of the plateau landscape to the north-west of the A367. Higher buildings would be particularly visible on the elevated plateau.
- Loss of landscape features such as mature vegetation and valued grass habitat.
- Loss of agricultural fields and hedgerow field boundaries.
- Development could introduce new lighting resulting in night blight.
- Development could impact the rural quality of the footpaths that run along the boundaries of the assessment unit (including the Circuit of Bath).

Mitigation and Enhancement Opportunities

- Low potential for mitigation due to the open character of the plateau to the north-west of the A367.
- Retain, protect and enhance all mature vegetation and valued grass habitat, especially mature woodland (including priority habitat deciduous woodland along the edges of the assessment unit), and semi-improved neutral grassland to the south of the A367.
- Improve the connectivity of woodland and hedgerows through new tree planting and hedgerow corridors that are in character with the locality, using native species where possible/suitable.
- Loss of open arable fields is unavoidable as any potential development in parcel 3b would remove land from agricultural use. However, field boundaries should be retained and enhanced where possible to avoid complete loss of field pattern.
- Minimise the influence of lighting associated with new development and only install outdoor lighting where necessary.
- Follow the Institute of Lighting Professionals guidance and use dark sky-friendly lighting.
- Protect deciduous woodland lining the footpaths. Set development back from these recreational resources to preserve their rural character.

Effect on the Settlement Form and Edge of Bath

Potential Effects

- Development would not relate particularly well to the existing settlement edge of Bath, which is contained by vegetation. New development could be seen as an encroachment on the open and rural character of parcel 3b and an extension of the urban fringe character.
- Development could adversely impact the rural surroundings to Bath.

Mitigation and Enhancement Opportunities

- Retain and enhance vegetation that filters views of the settlement edge.
- Ensure that potential development is well integrated within the surrounding landscape to minimise visual impact, through careful design and new tree planting.

Visual Amenity

Potential Effects

- Development could have a high impact on the expansive views to and from the assessment unit due to the partly open character of the landscape, particularly of parcel 3b.
- Development may be seen by:
 - Pedestrians on the local footpaths that run along the boundary of the assessment unit and beyond (including across the Newton Brook Valley).
 - Pedestrians/cyclists on the Circuit of Bath promoted route along the northern and eastern boundaries.
 - Motorists/cyclists using the A367 that cuts across the assessment unit and the surrounding roads (including Kilkenny Lane and Combe Hay Lane).
 - Pedestrians on the Cotswold Way National Trail (within the Cotswolds National Landscape), particularly at vantage points on Penn Hill, Dean Hill, Kelston Round Hill and Prospect Stile.
 - Road users on Kelston Road A431 which runs alongside the park (Road View K1).
 - Visitors to Kelston Park on the Cotswold Escarpment (within the Cotswolds National Landscape).

- Visitors and residents in Bath, at Odd Down and elevated locations within the city with south/south-westward views to the surrounding countryside. Those noted in the City of Bath WHS Setting SPD include viewpoints from Prospect Stile (Viewpoint 1), Beckford's Tower and Lansdown Cemetery (Viewpoint 2), Little Solsbury Hill (Viewpoint 10), Twerton Roundhill (Viewpoint 13) and Primrose Hill (Viewpoint 20).

Mitigation and Enhancement Opportunities

- Retain, protect and enhance all existing vegetation within and adjacent to any development site, including the mature vegetation that surrounds the assessment unit, and valued grass habitat on the site of the Fullers Earthworks Recycling Centre.
- Filter new development with additional planting, using local native species where possible/suitable, to maintain the rural character of the wider area and minimise impacts on receptors.
- Intersperse green open space and tree planting within development to help soften and break up the perceived mass of built forms, strengthen green infrastructure, and enhance the integration of built forms within the landscape.

Views to and from the Cotswolds National Landscape

Potential Effects

- Development could detract from the rural prospect the landscape provides to the Cotswolds National Landscape.
- Development could interrupt views to and from Kelston Park and the wooded slopes of the Cotswold Escarpment, which provide a green backdrop to the landscape of the assessment units.

- Development could interrupt views to the house at Kelston Park, detracting from its value as a local landmark.

Mitigation and Enhancement Opportunities

- Locate development where it is well enclosed by landform and/or vegetation and would have less influence on the views to and from the Cotswolds National Landscape.
- Retain views to the Cotswolds National Landscape, when looking north-west from the assessment unit, particularly to local landmarks such as Kelston Park.

WHS Heritage Impact Assessment

Commentary Against Attributes and Receptors

3.37 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.

Roman Archaeology

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

- 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.

3.39 Receptors for this attribute include:

- Known Roman Road, Roman Road A367.

3.40 The assessment unit contains one receptor that conveys the attribute and contributes to OUV. The receptor lies partially within the assessment unit along its southern boundary. Its presence was identified by geophysical survey and potentially crop marks, but it has been overlain with agricultural deposit and is not visible on current aerial imagery or LiDAR. The level of preservation is unknown, but archaeological remains of the road and related occupation might be preserved below ground in this area. The receptor makes a contribution to the attribute as part of the archaeological record of Roman activity around Bath. Roman Roads are mentioned in sub-attribute 4, and they are noted in the statement of OUV. The asset has been specifically identified in the WHS management plan and setting SPD as a contributor to OUV.

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

Georgian Town Planning

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

- 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.
- 18. The principal historic road routes into the city, marking the arrival points for visitors who almost universally came by road.
- 20. C18th picturesque principles including the relationship of buildings to landscape, the concept of blending countryside and town, and historic parks and gardens.

3.43 Receptors for this attribute include:

- The character and appearance of the assessment unit itself as partially undeveloped green countryside on the edge of the city.
- Viewpoints (map 7 Setting SPD)
 - 1 Prospect Stile
 - 2 Beckford's Tower and Lansdown Cemetery
 - 3 Lansdown Crescent
 - 4 Approach Golf Course
 - 10 Little Solsbury Hill
 - 15 Sham Castle
 - 20 Primrose Hill

- Historic Views (map 9 Setting SPD)
 - 4a The Avon Valley (west)
 - 8 Lansdown
 - 17 Sham Castle and the Fir Forest
 - 19a Widcome Hill
- Road Viewpoints (map 14 Setting SPD)
 - Wel2
 - W2 and W5 Claverton Down Road and Widcombe Hill
- Historic sites and features
 - Combe Hay Manor – grade I listed building and estate parkland
 - A367 Roman Road – historic south-western approach to the city

3.44 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.

3.45 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 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, the area contributes to this attribute more strongly than other less visually prominent parts of the setting.

3.46 Due to the area's location and topography, it is views looking south-west across the city from viewpoints on its northern and south-eastern hills that it

most often forms part of. This includes historic rides and walks on the north side of the valley, such as from Prospect Stile and Beckford's Tower and Lansdown. 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.

3.47 The area also contributes to views from and of the western edge of the city. This includes those along the historic western routes into and out of the city such as Kilkenny Lane to the north of the assessment unit and the A367 Roman Road. The latter dissects the area and follows the line of a Roman road, with continued use throughout the medieval period and later becoming a turnpike road. Leaving the city from the west, the views from Road Viewpoint Wel2 create a sense of transition from the urban form of the city into the rural hinterland of the surrounding landscape. Although the fixed viewpoint has particular value, it is more important as part of the kinetic view that would have been experienced on this approach/exit to the city.

3.48 The later development of Odd Down and the recycling centre within parcel 3a has brought some development into the rural surroundings, but this approach still has a strong sense of rurality until the city edge is crossed. This helps it convey its importance as part of the historic route. Parcel 3b appears in these views in a form much as it has for centuries, adding to the authenticity of the attribute. Parcel 3a retains some of its historic integrity despite the partial change of use.

3.49 Given the above, the physical characteristics of much of the assessment unit as rural, partially undeveloped space and the contribution this makes in views along routes approaching the city, as well as the backdrop in views of the city, is fundamental to its contribution to the attribute. Its location beyond the city limits places this 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 and leaving the city to the south-west.

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

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

3.51 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.

3.52 Receptors for this attribute include:

- The character and appearance of the assessment unit itself as partially undeveloped green countryside on the edge of the city.
- Viewpoints (map 7 Setting SPD)
 - 1 Prospect Stile
 - 2 Beckford's Tower and Lansdown Cemetery
 - 3 Lansdown Crescent
 - 4 Approach Golf Course
 - 10 Little Solsbury Hill
 - 15 Sham Castle
 - 20 Primrose Hill

- Historic Views (map 9 Setting SPD)
 - 4a The Avon Valley (west)
 - 8 Lansdown
 - 17 Sham Castle and the Fir Forest
 - 19a Widcome Hill
- Road Viewpoints (map 14 Setting SPD)
 - Wel2
 - W2 and W5 Claverton Down Road and Widcombe Hill
- Historic sites and features
 - Combe Hay Manor – grade I listed building and estate parkland
 - Combe Hay – conservation area
 - Fortnight Farmhouse – grade II
 - Crossways House – grade II
 - Dunkerton

3.53 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.

3.54 The open agricultural landscape around the city edges is felt especially keenly in views across 3b from the historic approach to the city along the A367. Here, the western city limits are legible, glimpsed across fields and between

trees. These views strongly illustrate the distinct yet complementary characters of urban city and rural countryside. Such views are particularly important in conveying the compact nature of the city contained within the Cotswold hills by its hollowed-out valley landscape and the agricultural land uses that have for centuries helped define and distinguish the countryside setting of the city from the dense urban core. The assessment unit's rural character and location at a critical point of transition into the urban fringes of the city has a strong influence on perceptions and first impressions on this approach to the city.

3.55 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, inns, estates and settlements such as Fortnight Farmhouse (grade II), Crossways House (grade II), Combe Hay Manor, and villages and hamlets like Combe Hay (conservation area within the setting boundary containing numerous listed buildings) and Dunkerton and Inglesbatch (beyond the setting boundary). 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.

3.56 The ability to appreciate these features as separate but related entities is emphasised by the rural 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 as 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.

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

Overall Contribution of Assessment Unit to OUV

Table 3.6: Summary of the contribution of assessment units to attributes/OUV

Attribute	Contribution
Roman Archaeology	Medium
Hot Springs	None
Georgian Town Planning	High
Georgian Architecture	None
The Green Setting of the City in the Hollow in the Hills	High
Georgian Architecture Reflecting 18 th Century Social Ambitions	None
Overall contribution of the assessment unit to OUV	High

3.58 Overall, the assessment unit makes a high contribution to the OUV of the property.

Variations in Contributions to OUV

3.59 The contribution of parcel 3b is higher due to the existence of Roman archaeology within its boundary and its ongoing agricultural use. It is less screened by trees than 3a and so allows for more far-reaching views across the open countryside towards the city. 3b has been partially developed but retains some open space and field boundaries, giving it a semi-rural character. The recycling centre is also largely screened by trees which, although not open and agricultural in character, gives it a softer green edge that limits its visual impact.

3.60 The high level of contribution to OUV stems principally from parcel 3b, giving the assessment unit a high level of contribution as a whole. For

development types that are only being considered in parcel 3a, the contribution is considered medium.

Attribute Sensitivity to Change and Potential Impact

3.61 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.

Roman Archaeology Sensitivity to Change

3.62 Due to the physical nature of archaeological remains, the sensitivity of the attribute to change in relation to this assessment unit is dependent on the location of potential development and whether the receptor will be physically affected. The attribute is extremely sensitive to direct physical impact on receptors, regardless of the type of development. Development that avoids physical impact on the receptors will have less or no impact.

Georgian Town Planning Sensitivity to Change

3.63 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.

3.64 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

3.65 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.

3.66 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.

Potential Impact of Residential Development

Table 3.7: Potential impact of residential development

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

3.67 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. This is because there are at least some parts of the assessment unit that are highly sensitive to the type of development proposed. Accordingly, although there are variations in sensitivity in individual land parcels, the maximum potential impact within the assessment unit is major.

3.68 There are individual land parcels where some development types would have a lower, moderate impact. For example, small scale (>1ha) and medium scale (1-5ha) residential development could physically be accommodated within parcel 3a without impacting on archaeological remains. In addition, this unit has areas of existing development that could be replaced by small residential developments and would have less of an impact than new development in 3b. However, 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 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, but with some locations resulting in a higher level than others.

Potential Impact from Business Park Development

Table 3.8: Potential impact from business park development

Typology	3a	3b	Overall Potential Impact on Assessment Unit
Small scale Business Park (<1ha) – 2 storey pavilion buildings (13m), low levels of surface car parking, well treed or parkland setting	Moderate adverse	Major adverse	Major adverse
Medium scale Business Park (1-5ha) – 2 storey pavilion buildings (13m), low levels of surface car parking, well treed or parkland setting	Moderate adverse	Major adverse	Major Adverse
Medium to large scale Business Park (5-10ha) – 2 storey pavilion buildings (13m), low levels of surface car parking, well treed or parkland setting	Major adverse	Major adverse	Major adverse
Large scale Business Park (>10ha) – 2 storey pavilion buildings (13m), low levels of surface car parking, well treed or parkland setting	Major adverse	Major adverse	Major adverse

3.69 Overall, there is the potential for a major adverse impact from all sizes of business park development on the ability of the assessment unit to convey the attributes. This is because there are at least some parts of the assessment unit that are highly sensitive to the type of development proposed. Accordingly, although there are variations in sensitivity in individual land parcels, the maximum potential impact within the assessment unit is major.

3.70 There are individual land parcels where some development types would have a lower, moderate impact. For example, small scale (>1ha) and medium scale (1-5ha) development could physically be accommodated within parcel 3a without impacting on archaeological remains. In addition, this unit has areas of existing development that could be replaced by small business park developments and would have less of an impact than new development in 3b. However, the form of the development – the outline heights of the two-storey pavilion buildings, the larger floorplates, the surface car parking and planting – 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 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, but with some locations resulting in a higher level than others.

Potential Impact from Transport Interchange (Park & Ride) and Waste Transfer Station/Recycling Centre Development

Table 3.9: Potential impact from transport interchange (park & ride) and waste transfer station/recycling centre development

Typology	3a	3b	Overall Potential Impact on Assessment Unit
Medium scale Transport Interchange (Park & Ride) 700 car parking spaces	Moderate adverse	N/A	Moderate adverse
Large scale Transport Interchange (Park & Ride) 1500 car parking spaces	Moderate adverse	N/A	Moderate adverse
Waste Transfer Station/Recycling Centre	Moderate adverse	N/A	Moderate adverse

3.71 There is the potential for a moderate adverse impact on the ability of the land parcel to convey the attributes resulting from all sizes of transport exchange. Land parcel 3a is less sensitive to this type of development as it already contains a waste transfer/recycling facility and the park and ride lies to its eastern edge. This type of development would intensify the existing change to character, rather than introducing a wholly new development. However, it would result in the loss of the remaining field boundaries and openness that do survive within the land parcel. This loss would further diminish the area's ability to convey the attributes of Georgian town planning and the green setting of the city in the hollow in the hills.

Level of Effect on the WHS

Table 3.10: 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
Medium scale transport interchange (Park & Ride) 700 car parking spaces (land parcel 3a only)	Medium	Moderate adverse	Medium adverse
Large scale transport interchange (Park & Ride) 1,500 car parking spaces (land parcel 3a only)	Medium	Moderate adverse	Medium adverse
Waste transfer/recycling centre (1.75-2ha) (land parcel 3a only)	Medium	Moderate adverse	Medium adverse

Level of Effect on the OUV of the WHS

3.72 All 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.

3.73 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 and the form of the business park and transport exchange, are all urban built forms that are 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.

3.74 With regard to the impact on the attribute of Roman archaeology, as noted above harm may be averted by avoiding direct physical impact on the receptor. If this was unavoidable, then mitigation/offsetting in the form of recording may be possible. For the attributes of Georgian town planning and ‘the green setting of the city in a hollow in the hills’, however, 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. 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.

3.75 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)

3.76 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.

3.77 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.

3.78 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’.

3.79 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.

3.80 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.

3.81 The medium adverse effects that might be experienced from some development types solely on land parcel 3a may be considered “less than substantial in NPPF terms”. Paragraphs 199 and 200 would continue to apply, along with paragraph 202. This requires the public benefits of the proposal to be weighed against the harm.

UNESCO Guidance

3.82 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”.

3.83 For development to be considered acceptable, the level of negative effect would have to be reduced to negligible. The medium adverse effects that might be experienced from development solely on land parcel 3a is still unlikely to result in a significant enough reduction in negative impact to meet this, and so is likely to still be considered significant by UNESCO.

3.84 Only when all the above has been considered can the impact on the historic environment be fully understood. Without this, the planning balance of weighing harm against benefits cannot be carried out, as there is an incomplete picture as to the extent of impact on heritage assets. Given the high adverse levels of harm already identified to the City of Bath WHS, however, the cumulative impact can only be very high when further adverse impacts of any level to the WHS and other designated assets are taken into account.

Appendix A

Viewpoint Location and ZTV Plans

ZTV for Assessment Unit 3a & b

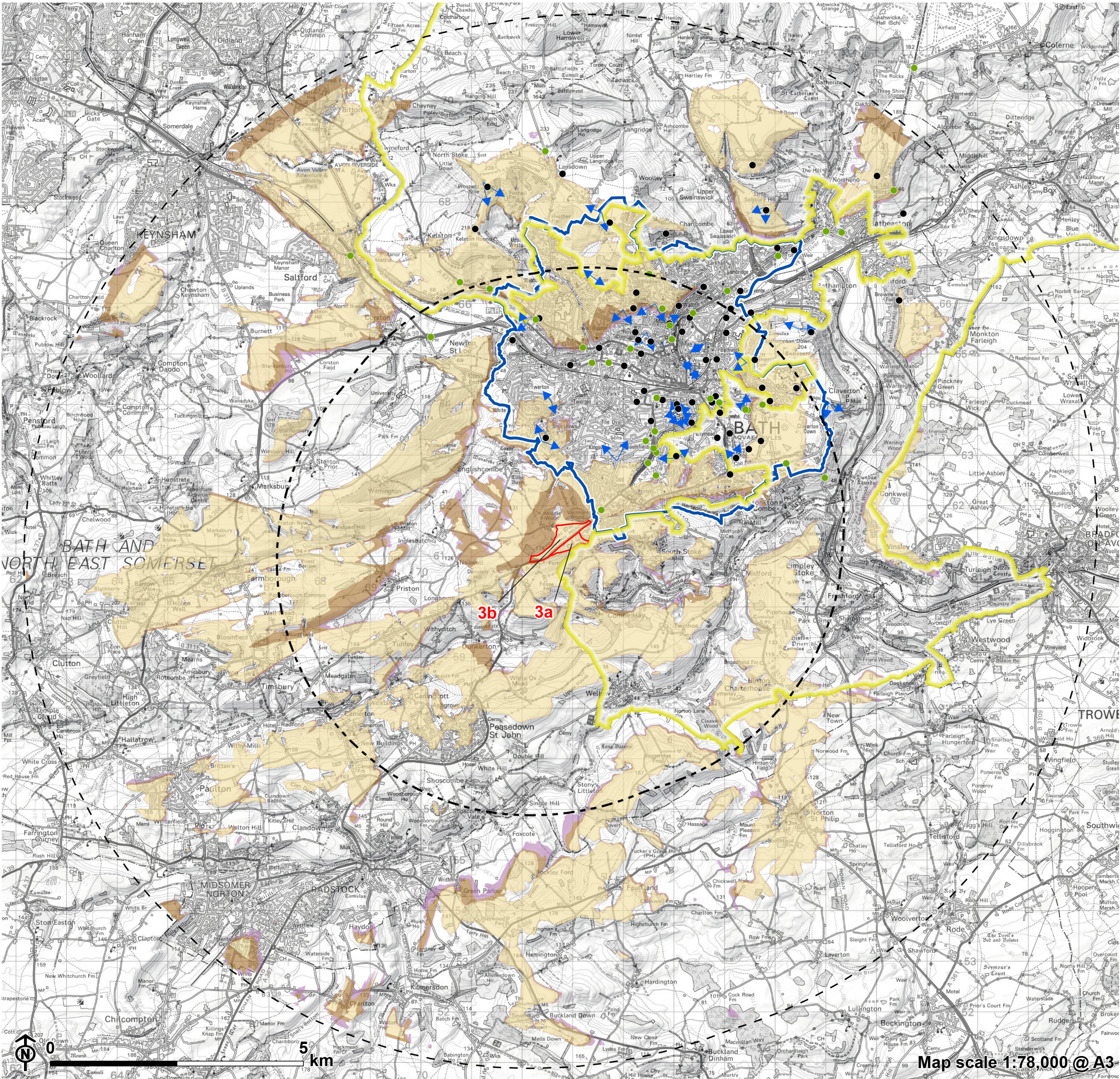
- Assessment unit boundary
- 5km from assessment unit boundary
- 10km from assessment unit boundary
- Cotswolds National Landscape
- City of Bath World Heritage Site
- Potential development at 6m (3a only)
- Potential development at 9m
- Potential development at 13m
- WHS SPD Viewpoints
- WHS SPD Historic 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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