

West of Bath Potential Growth Locations

Landscape and Historic Environment Assessment

Bath and North East Somerset Council

Final report

Prepared by LUC

January 2024



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Chapter 1

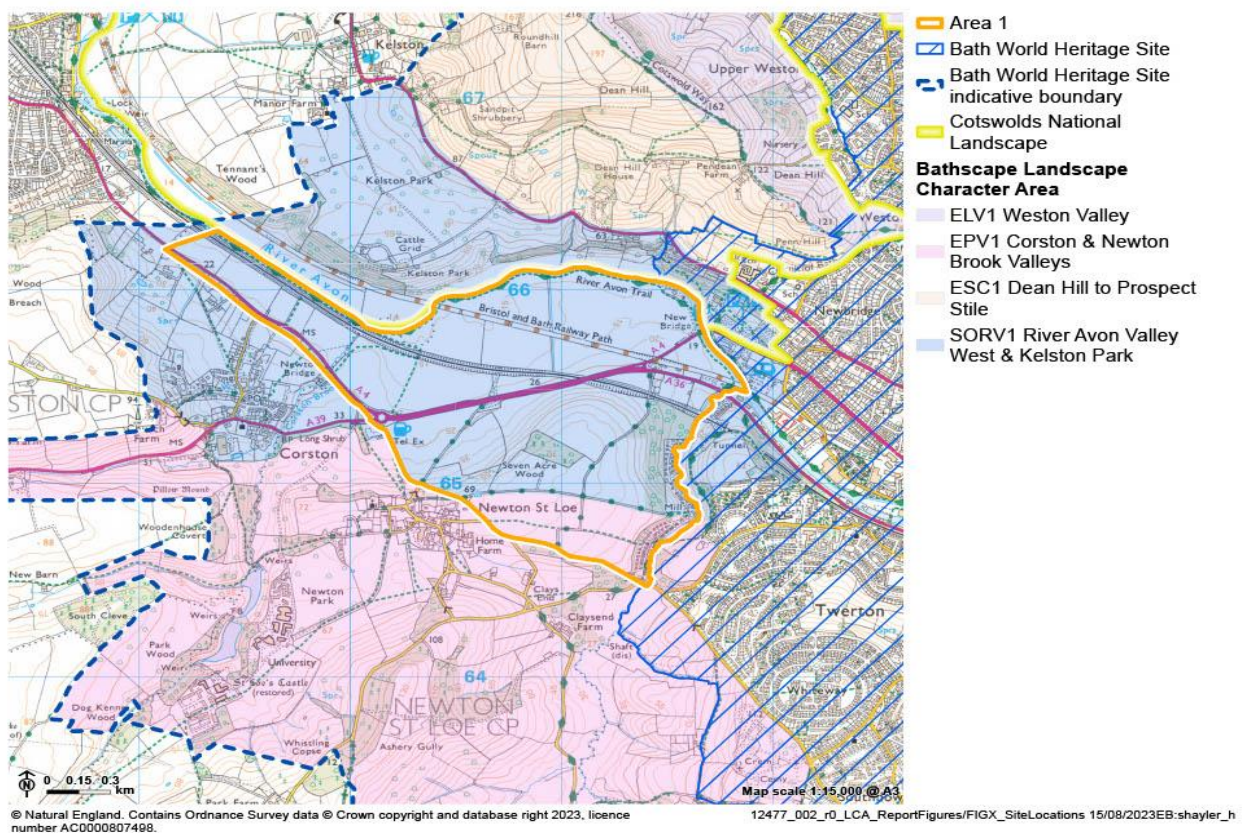
Non-Technical Summary

1.1 This Landscape and Heritage Impact Assessment provides judgements on the landscape and heritage sensitivity of potential growth locations to the west of Bath to a variety of development types. The findings of this study will help to inform the Local Plan Options for Bath and North East Somerset (B&NES) in support of the forthcoming Local Plan.

Landscape Character and Visual Amenity

Area 1

Figure 1.1: Location of Area 1



1.2 Area 1 includes a low-lying valley landscape which forms part of the floodplain of the River Avon (Bathscape LCT Settled Open River Valley), which rises to a rounded hill/plateau to the south. Its rural character is influenced in the lower lying landscape by existing development and busy transport corridors which cross the valley. This is an open arable landscape which provides a green approach to Bath and a setting to the CNL to the north.

1.3 Assessment unit 1a, 1b and 1c are located on the valley floor. The assessment unit is judged to have moderate sensitivity to smaller-scales of development (including residential, business park and park and ride development) where they could be accommodated in those landscapes associated with existing mixed-use development and transport infrastructure. Sensitivity increases to high for larger scale development, over 5 hectares, that would encroach on the more open and rural floodplain of the valley (particularly parcel 1a). There is some potential for mitigation in this area.

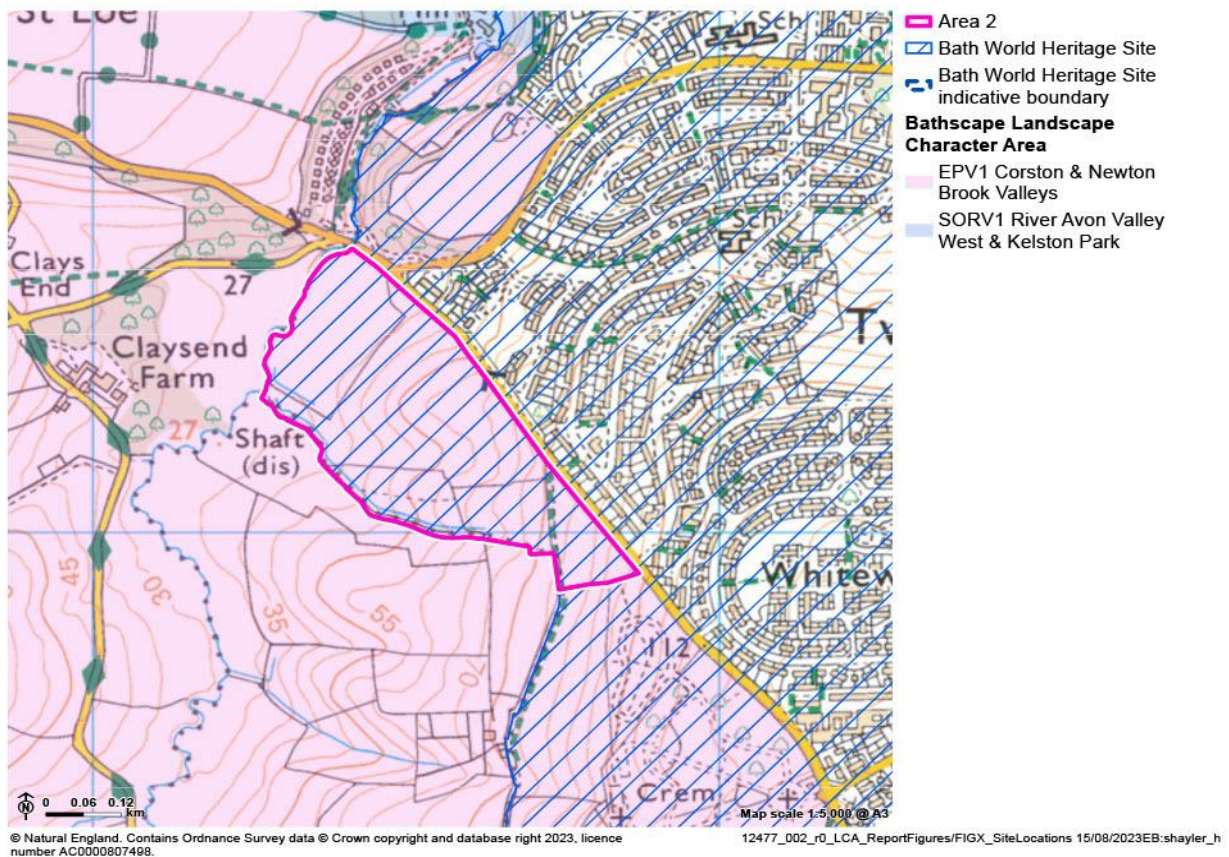
1.4 Assessment unit 1d, 1j, 1k, 1l and 1m are located on the low hilltop/plateau south of the Avon Valley. The prominent hill and steep slopes provide a green backdrop to the CNL and a green edge to Bath, and the open landscape has intervisibility with surrounding areas. As a result, the assessment unit is judged to have a high sensitivity to all development types.

1.5 Assessment unit 1e and 1f comprise shallow slopes, extending from the plateau south of the River Avon valley. The open arable farmland of this elevated landscape has intervisibility with surrounding areas and provides a green backdrop to the CNL and a green edge to Bath. As a result, the assessment unit is judged to have a high sensitivity to all development types.

1.6 Assessment unit 1g, 1h and 1i are located on the low-lying valey floor of the River Avon, in the west of area 1. The landscape is judged to have moderate sensitivity to small scale residential and business park development (under 1 hectare), where it could be accommodated in the more enclosed landscapes which are most influenced by existing infrastructure (parcel 1g and 1i). However, the landscape is judged to have high sensitivity to development of over 1 hectare, or tall development (student accommodation) which would encroach on the more open landscape of the valley and have a high impact on existing views to and from the area. There is limited potential for mitigation in this area.

Area 2

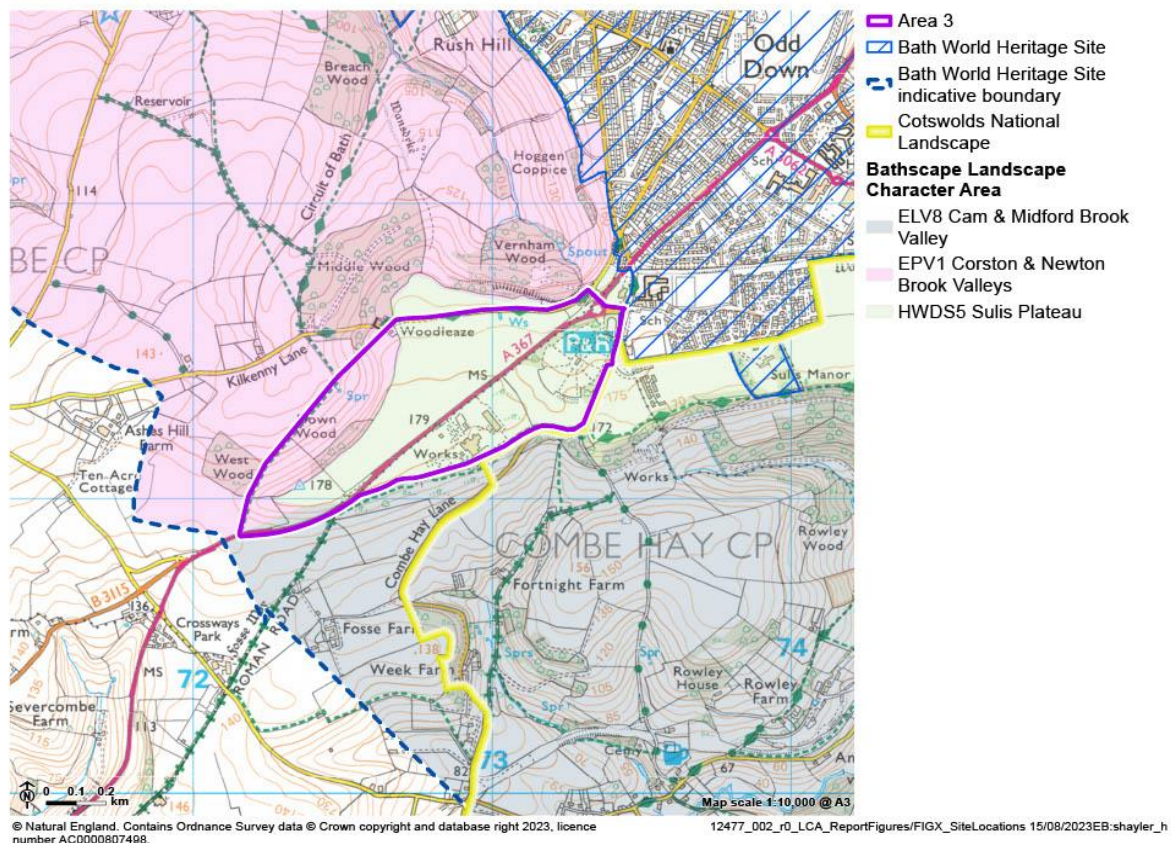
Figure 1.2: Location of Area 2



1.7 Area 2 is a gently undulating rural landscape, forming part of the west facing slopes of the Newton Brook valley (Bathscape LCT Eroded Plateau and Valleys). This is an open landscape with extensive views over the surrounding countryside, including to the CNL. Located on the edge of Twerton, the landscape provides a green edge to Bath. The landscape is judged to have a high sensitivity to all development types.

Area 3

Figure 1.3: Location of Area 3



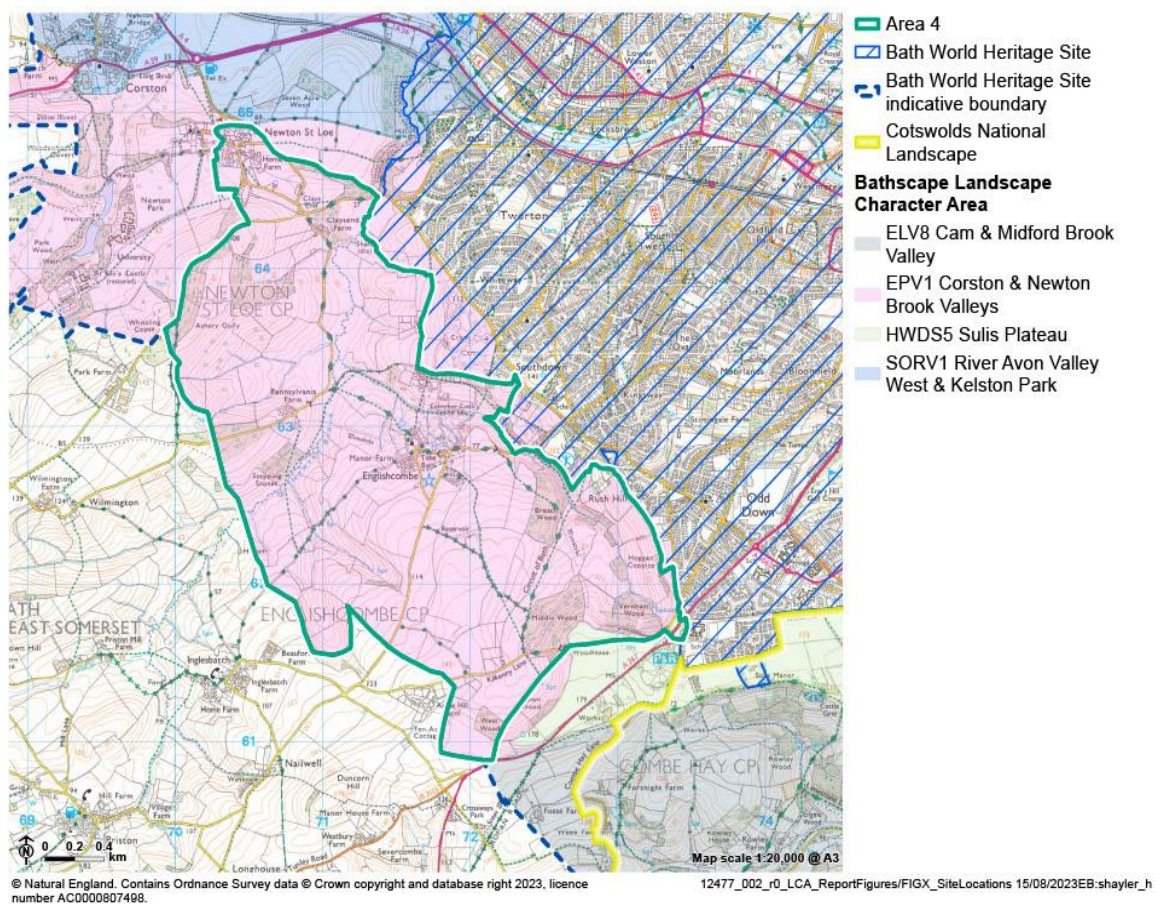
1.8 Located on a narrow plateau with steep sides (Bathscape LCT High Wold-Dip Slope and LCT Eroded Plateaus and Valleys), Area 3 is divided by the A367. To the south east of the road (parcel 3a), is an urban fringe landscape with existing development, including a park and ride and recycling centre, which is well enclosed by vegetation. To the north-west of the trunk road (parcel 3b) is an area of mixed farming, with an open character and extensive intervisibility with the surrounding landscape.

1.9 The landscape of parcel 3a, is judged to have low-moderate sensitivity to the assessed development types (recycling centre, park and ride, as well as small scale residential development), which could be physically accommodated

within the area. The sensitivity to small scale residential development rises to moderate within the more open, rural landscape of parcel 3b, and higher for larger scale residential development and business park development.

Area 4

Figure 1.4: Location of Area 4



1.10 Area 4 is an intricate landscape of steep sided incised valleys with open ridges and rounded hill tops, with varying degrees of openness and enclosure. This is a tranquil rural landscape, where small woodlands and well-treed historic villages sit within mixed farmland. The area forms part of the wider rural setting to Bath and the CNL.

Summary of findings

1.11 The study has identified the landscape of the assessment units to have a high sensitivity to development of all types assessed except for:

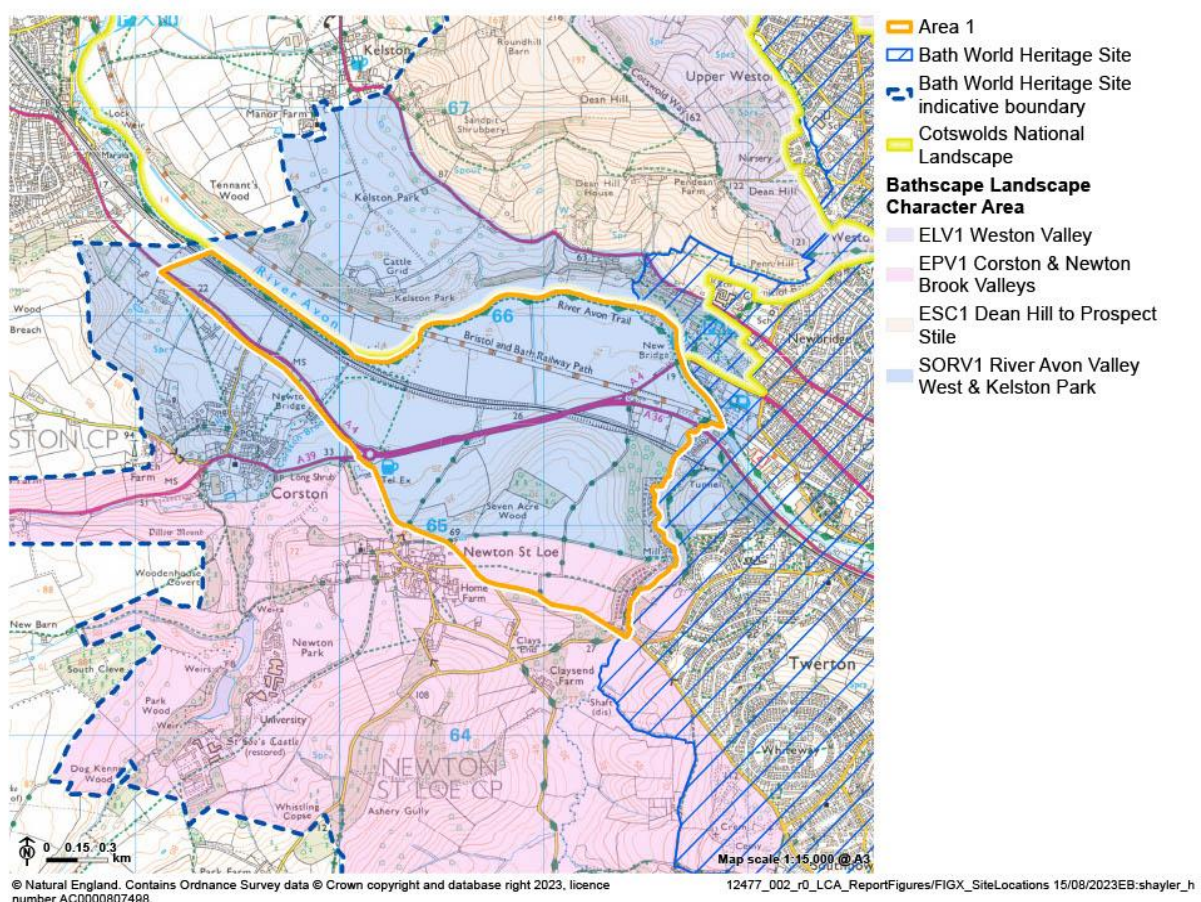
- **Parcels 1a, 1b and 1c**, where the landscape of the valley floor in the east of Area 1 was identified as moderate sensitivity to small and medium scale residential, business park and transport interchange development types. However, the level of sensitivity increased to moderate-high for these development types over 5 hectares. The landscape has a high sensitivity for all other development types (PBSA, and developments over 10 hectares).
- **Parcel 1g, 1h and 1i**, where the landscape of the valley floor in the west of Area 1, was identified as having moderate sensitivity to small scale residential, business park, and transport interchange development types. However, the level of sensitivity increases to high for developments over 1 hectare.
- **Parcel 3a**, where the urban-fringe landscape was identified as having low-moderate sensitivity from the extension of the existing park and ride/transport interchange or recycling centre, as well as small scale residential development. This rises to moderate-high sensitivity for residential development over 1 hectare and high for development over 5 hectares.
- **Parcel 3b**, where the plateau landscape was identified as having moderate sensitivity to small scale residential development. This rises to high for larger scale residential and any scale of business park development.

1.12 Smaller-scale development (by both height and area) within parcels with less sensitive landscapes would have a reduced impact on landscape character, but would still result in the loss of open, green space and the introduction of built forms that are not in-keeping with the existing character of the landscape.

Historic Environment

Area 1

Figure 1.5: Location of Area 1



1.13 Assessment unit 1a, 1b and 1c conveys the attributes of Roman archaeology, Georgian Town Planning, and the green setting of the city in the hollow in the hills. The overall contribution of the assessment unit to the OUV of the WHS is high. Major adverse levels of impact have been identified for all types and sizes of development, although parcels 1b and 1c are considered less sensitive to small and medium scale residential, business park and transport interchange development types, resulting in a moderate adverse

impact. The level of effect on the OUV of the WHS from all development types for the assessment unit overall is high adverse.

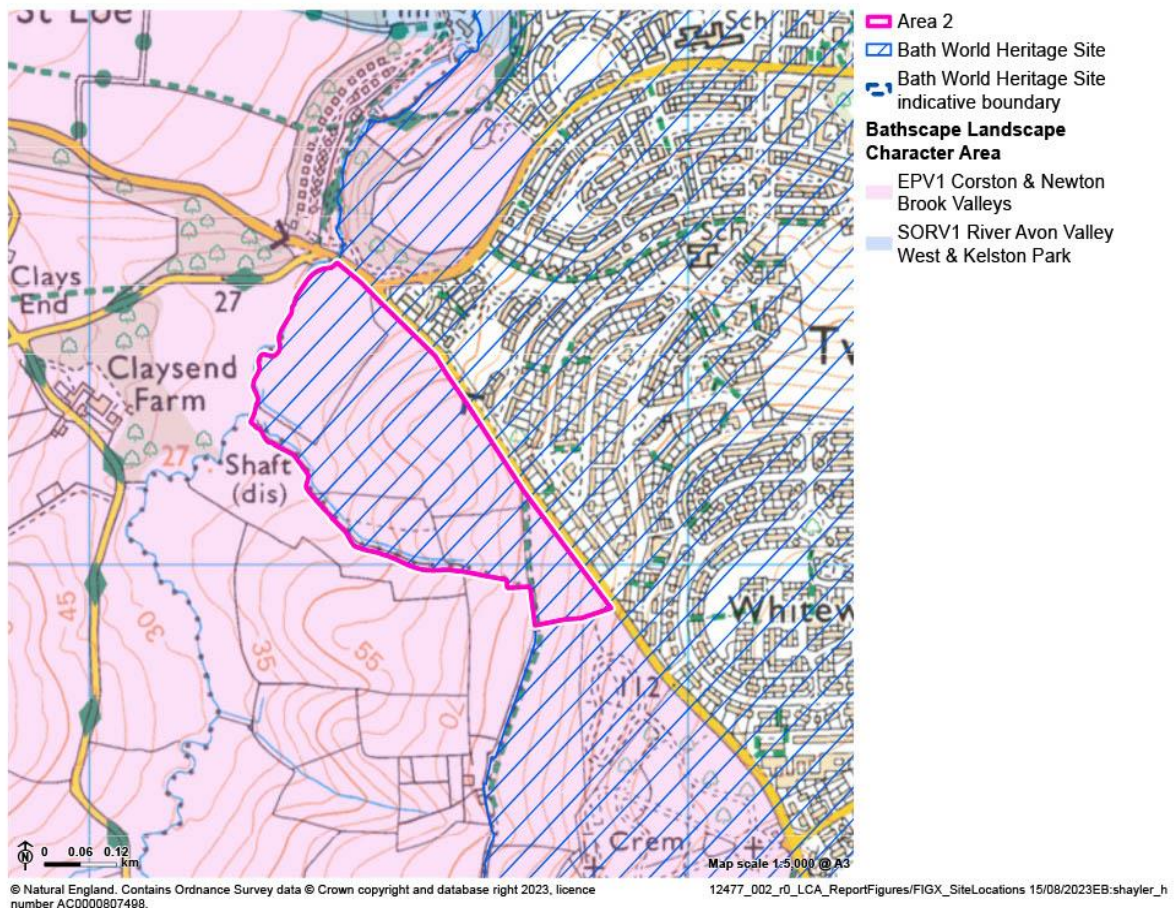
1.14 Assessment Unit 1d, 1j, 1k, 1l and 1m conveys the attributes of Roman archaeology, Georgian Town Planning, and the green setting of the city in the hollow in the hills. The overall contribution of the assessment unit to the OUV of the WHS is high. Major adverse levels of impact have been identified for all types and sizes of development across all land parcels. The level of effect on the OUV of the WHS from all development types for the assessment unit overall is high adverse.

1.15 Assessment Unit 1e and 1f conveys the attributes of Roman archaeology, Georgian Town Planning, and the green setting of the city in the hollow in the hills. The overall contribution of the assessment unit to the OUV of the WHS is high. Major adverse levels of impact have been identified for all types and sizes of development across all land parcels. The level of effect on the OUV of the WHS from all development types for the assessment unit overall is high adverse.

1.16 Assessment Unit 1g, 1h and 1i conveys the attributes of Roman archaeology, Georgian Town Planning, and the green setting of the city in the hollow in the hills. The overall contribution of the assessment unit to the OUV of the WHS is high. Major adverse levels of impact have been identified for all types and sizes of development across all land parcels. The level of effect on the OUV of the WHS from all development types for the assessment unit overall is high adverse.

Area 2

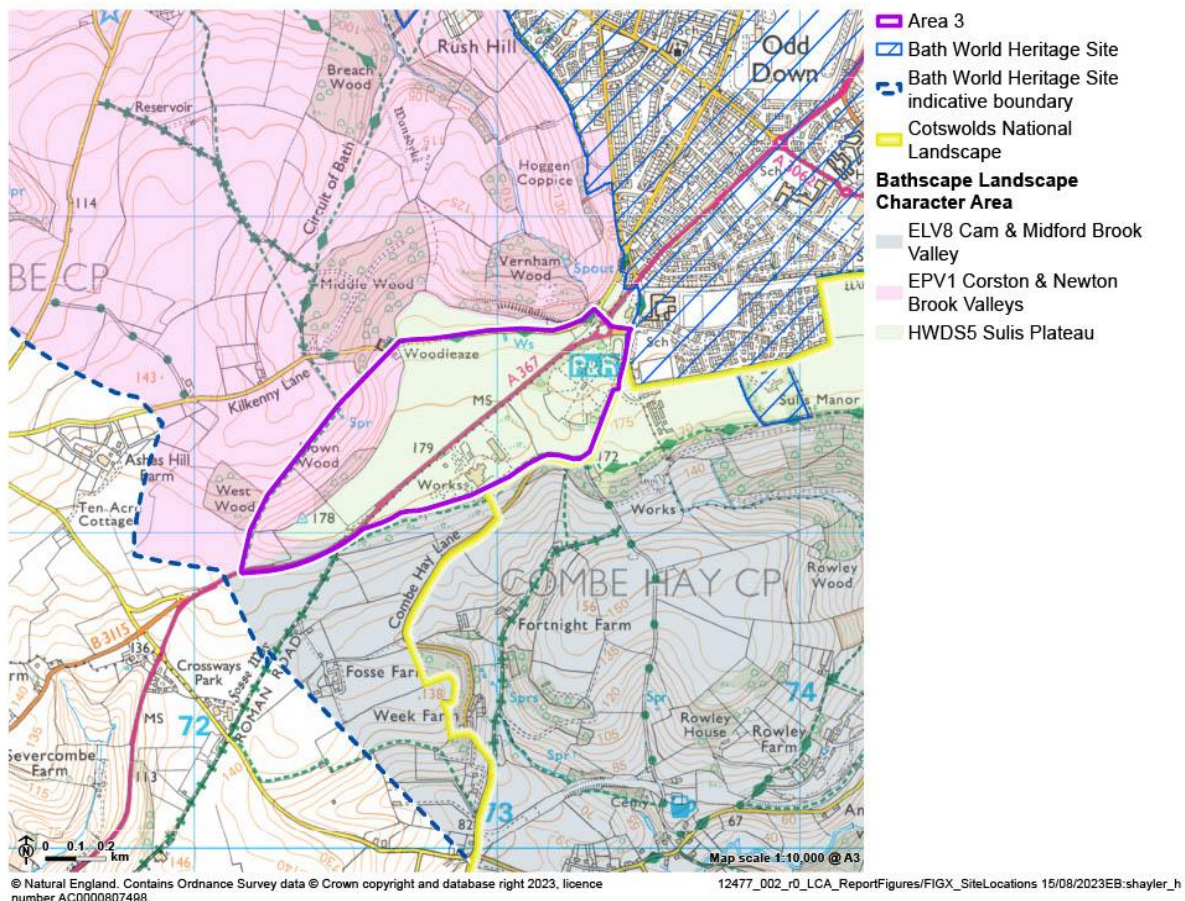
Figure 1.6: Location of Area 2



1.17 Assessment Unit 2 conveys the attributes of Georgian Town Planning, and the green setting of the city in the hollow in the hills. The overall contribution of the assessment unit to the OUV of the WHS is high. Major adverse levels of impact have been identified for all types and sizes of residential development. The level of effect on the OUV of the WHS from all development types for the assessment unit overall is high adverse.

Area 3

Figure 1.7: Location of Area 3



1.18 Assessment Unit 3a and 3b conveys the attributes of Roman archaeology, Georgian Town Planning, and the green setting of the city in the hollow in the hills. The contribution of parcel 3b is high due to the existence of Roman archaeology (not present in 3a) and its greater visual prominence. The contribution of parcel 3a is medium. Overall the contribution of the assessment unit to the OUV of the WHS is high.

1.19 Major adverse levels of impact have been identified for all types and sizes of residential and business park development, although parcel 3a is considered less sensitive to small and medium scale residential and business park

development types, resulting in a moderate adverse impact. The level of effect on the OUV of the WHS from all residential and business park development types for the assessment unit overall is high adverse.

1.20 A transport interchange/extension to the existing park and ride and a waste transfer station / recycling centre was also considered solely for parcel 3a.

Moderate adverse levels of impact have been identified for both development types. The level of effect on the OUV of the WHS for this type of development on this land parcel is medium adverse.

Summary of Findings

1.21 The study has identified harm to the world heritage site (WHS) from all the assessment units. The potential level of harm is high adverse across the board, except for:

- **Parcel 3a**, which was identified as experiencing a medium level of effect on the OUV of the WHS from the extension of the existing park and ride/transport interchange.
- **Parcels 1b and 1c**, which were identified as experiencing a medium-high levels of effect on the OUV of the WHS from small and medium scale residential, business park and transport interchange development types. However, the level of effect for the assessment unit overall was still high.

1.22 This variation in potential levels of effect depends on the number of attributes that will be affected and the type of development proposed. Common to all the areas, however, is the impact development would have on the attribute of the 'the green setting of the city in the hollow in the hills'.

1.23 Central to this attribute is the containment of the city within the 'hollow' of the steep river valley and surrounded by the open, green, largely undeveloped landscape of its agricultural hinterlands. The character of the surrounding landscape is important where it is visible in views from and across the city. This is where the containment of the city is most apparent. However, it also defines

the approaches to the city – of passing through rural Bath & North East Somerset and entering the urban city centre. Consequently, views within the setting are equally important in conveying this attribute.

1.24 The spatial, visual and functional relationship of the landscape with the city is also important. It illustrates the organic, low-density evolution of settlements and land use over millennia as people responded to the opportunities and constraints created by the topography of the area. The landscape setting of the city stands in contrast with the tightly-grained, elegantly refined, conscious design of the city core, but it is the combination of this rural and urban landscape character that creates the exceptional and distinctive beauty of Bath.

1.25 The inclusion of this attribute as one of the six underpinning the inscription of the WHS reflects the importance of the setting of the city to its outstanding universal value (OUV): the setting of the city is so critical to the understanding and experience of the WHS that it has been put on an equal footing with the other attributes. Although most of the areas are within the setting of the WHS (apart from area 2, which is within the property boundary), they each strongly convey this attribute by virtue of their open, undeveloped character. As such, their contribution to the outstanding universal value of the WHS is high.

1.26 With this in mind, the harm caused to the OUV of the WHS by the types of development proposed is intrinsic and unavoidable. This is because it will fundamentally alter the character and appearance of the areas as undeveloped agricultural land that provides the green setting for the city. Smaller-scale development (by both height and area) within less sensitive land parcels would reduce the level of harm, but it cannot avoid harm. It would still result in the loss of open, green space and the introduction of built forms that are not in-keeping with the character of the landscape. In short, this is an ‘in-principle’ issue that could not be overcome by design. No heritage benefits have been identified for any of the areas.

Chapter 2

Introduction

Background to this Study

2.1 This Landscape and Heritage Impact Assessment provides judgements on the landscape and heritage sensitivity of potential growth locations to the west of Bath to a variety of development types. The findings of this study will help to inform the Local Plan Options for Bath and North East Somerset (B&NES) in support of the forthcoming Local Plan.

Context: Legislation, Policy and Guidance

European Landscape Convention

2.2 The European Landscape Convention (ELC) came into force in the UK in March 2007. It established the need to recognise landscape in law; and develop landscape policies dedicated to the protection, management, and planning of landscapes; and to establish procedures for the participation of the general public and other stakeholders in the creation and implementation of landscape policies. The ELC remains relevant despite the UK's departure from the EU.

2.3 The ELC definition of 'landscape' recognises that all landscapes matter, be they ordinary, degraded, or outstanding:

“Landscape means an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors.”

2.4 Signing up to the ELC means that the UK is committed to protect, manage, and plan our landscapes for the future. The Convention also advocates work to raise landscape awareness, involvement and enjoyment amongst local and visiting communities. Landscape character is defined by the ELC as “a distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse”. Again, this reinforces the underlying message that ‘all landscapes matter’.

Legislation

2.5 The Planning (Listed Buildings and Conservation Areas) Act 1990 places duties on decision makers when considering applications that affect listed buildings to give “special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses” (section 66), and “special attention” to be paid to “the desirability of preserving or enhancing the character or appearance” of conservation areas (section 72). In the operation of this law, the concept of ‘preservation’ has been interpreted as to do no harm.

2.6 The terms ‘special regard’ to the desirability of preserving listed buildings and ‘special attention’ to the desirability of preserving and enhancing conservation areas are now generally understood legally. Case law has established that where a proposal does not preserve a listed building or a proposal neither preserves nor enhances a conservation area the effect is not to simply be classed as harm (or a public disbenefit) that must be balanced against the public benefits of the proposal, but instead that there is a presumption against approving the development altogether.

2.7 At present, this special regard/attention only applies to listed buildings and conservation areas. As this study is only concerned with the City of Bath World

Heritage Site (WHS) the legislation has not been considered further, although it will be applicable when the impact on other heritage assets is considered (see discussion in Chapter 6: Cumulative Effects). However, on 26 October 2023 the Levelling-up and Regeneration Act was given Royal Assent. Although the changes in the Act relating to development management and plan-making will require secondary legislation and changes to national policy, the provision is there to place a duty on decision-makers to give scheduled monuments, registered parks and gardens, registered battlefields and world heritage sites the same statutory 'special regard' as is currently given to listed buildings and conservation areas. With this in mind, it would be prudent to give the same regard to the City of Bath WHS in anticipation of these changes.

National Planning Policy Framework (NPPF)

2.8 The UK Government published an updated and revised National Planning Policy Framework (NPPF) in July 2021, which sets out the environmental, social and economic planning policies for England. Central to NPPF policies is a presumption in favour of sustainable development; that development should be planned for positively and individual proposals should be approved wherever possible.

2.9 One of the overarching objectives that underpins the NPPF is set out in Paragraph 8: "an environmental objective – to protect and enhance our natural, built and historic environment".

2.10 Chapter 15, Conserving and Enhancing the Natural Environment, Paragraph 180 states that "planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes" and "recognising the intrinsic character and beauty of the countryside".

2.11 Paragraph 182 states that plans "great weight" should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty. "The scale and extent of

development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas which have the highest status of protection in relation to these issues."

2.12 In addition, the Levelling Up and Regeneration Act (LURA) 2023, requires relevant authorities in England to actively "seek to further the purpose of conserving and enhancing the natural beauty" of National Landscapes (AONBs). This replaces the more passive 'duty of regard' to the purpose from Section 85 of the Countryside and Rights of Way Act 2000.

2.13 Although there are references to the historic environment throughout, Chapter 16: Conserving and Enhancing the Historic Environment deals with the topic in detail. Some of the paragraphs within the chapter are always relevant when dealing with the historic environment; some are triggered only in certain circumstances, for example, when harm is identified.

2.14 The opening paragraph (189) applies across the board: "Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations". This policy recognises that heritage assets are finite, but also that a proportionate approach to their conservation is needed depending on the level of their significance. In the case of the City of Bath WHS, we are dealing with a heritage asset that has been identified as being of international significance. There is no higher level that can be awarded in terms of heritage significance.

2.15 When harm to a heritage asset has been identified, it triggers the application of other paragraphs in NPPF, namely paragraphs 199, 200, 201 and 202.

2.16 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.

2.17 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’.

2.18 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. Paragraph 202 applies when the harm identified is less than substantial. Again, this requires the public benefits of the proposal to be weighed against the harm.

2.19 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.

2.20 Policies that affect the historic environment are not confined to Chapter 16, however, and the following policies are of relevance to the proposed development areas.

2.21 Paragraph 8 sets out three overarching objectives to achieve this: economic, social, and environmental. The historic environment is placed on an equal footing with the protection and enhancement of the natural environment, achieving economic success and supporting and improving the lives of people. Achieving these objectives is the basis of sustainable development and involves seeking positive improvements in the quality of the environment by protecting and enhancing it. As mentioned above, in the case of heritage assets this includes requiring local planning authorities to look for opportunities to enhance or better reveal their significance (paragraph 206).

2.22 Paragraph 127 states that planning policies and decisions should ensure developments “are sympathetic to local character and history, including the surrounding built environment and landscape setting” and “maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit”. At the root of the potential harm to the WHS as identified by the study is the fact that development of the type, density and locations proposed is not in-keeping with the character of the landscape or WHS. It would not maintain the “strong sense of place” that is so critical to the outstanding universal value of the city.

Local Plan Policy

Bath and North East Somerset Core Strategy

2.23 A Partial Update of the Core Strategy, Placemaking Plan was adopted in 2022, with the Local Plan Partial Update adopted in January 2023. These will be reviewed through the preparation of the new Local Plan (2022 to 2024).

2.24 Policies of relevance to the landscape sensitivity assessment include:

- Policy NE2: Conserving and Enhancing the Landscape and Landscape Character which states that development will be permitted where it conserves or enhances local landscape character, landscape features and

local distinctiveness, and that great weight will be afforded to conserving and enhancing landscape and scenic beauty of designated Areas of Outstanding Natural Beauty (AONBs), and with particular reference to their special qualities.

- Policy NE2A: Landscape setting of settlements, which seeks to ensure the protection of key landscapes and landform, landmarks and views/viewpoints which particularly contribute to the landscape setting of settlements. The policy recognises the importance of the distinctive landscape setting of Bath in a bowl formed by the River Avon Valley as it cuts through the Cotswolds. The policy protects the landscape which is importance to the distinct form and character of the city as set out in the City of Bath World Heritage Site Setting SPD.

2.25 Policies of relevance to the WHS heritage impact assessment include:

- Policy HE1: Historic Environment, which states that development that has an impact upon a heritage asset will be expected to enhance or better reveal its significance and/or setting, and make a positive contribution to its character and appearance. Great weight should be given to the conservation of the District's heritage assets and any harm must be justified.
- Under HE1, there is also a specific policy in relation to the City of Bath WHS. It states that development within the City of Bath WHS will be expected to comply with supplementary information and guidance – for example, the WHS setting SPD – and help support the delivery of the WHS management plan.

Cotswolds National Landscape and its Setting

2.26 The surrounding landscape, to the north and south-west of the assessment areas falls within the Cotswolds National Landscape (CNL).

2.27 The CNL (formerly the Cotswolds AONB) was designated in 1966, with an extension in 1990. There are many 'special qualities' of the AONB, including:

- The unifying character of the limestone geology – its visible presence in the landscape and use as a building material;
- The Cotswold escarpment including views from and to the National Landscape;
- The high wolds – a large open, elevated predominately arable landscape with commons, big skies and long-distance views;
- River valleys, the majority forming the headwaters of the Thames, with high-quality water;
- Distinctive dry stone walls;
- Flower-rich grasslands particularly limestone grasslands;
- Ancient broadleaved woodland particularly along the crest of the escarpment;
- Variations in the colour of the stone from one part of the National Landscape to another which add a vital element of local distinctiveness;
- The tranquillity of the area, away from major sources of inappropriate noise, development, visual clutter and pollution;
- Extensive dark sky areas; accessibility for recreation;
- Distinctive settlements, developed in the Cotswold vernacular with high architectural quality and integrity;
- An accessible landscape for quiet recreation for both rural and urban users, with numerous, walking and riding routes, including the Cotswold Way National Trail;
- Significant archaeological, prehistoric and historic associations dating back 6,000 years, including Neolithic stone monuments, ancient drove roads, Iron Age forts, Roman villas, ridge and furrow fields, medieval wool churches and country estates and parks; and
- A vibrant heritage of cultural associations, including the Arts and Crafts movement of the 19th and 20th centuries, famous composers and authors and traditional events such as the Cotswolds Olimpicks, cheese rolling and woolsack races.

2.28 The Cotswolds Conservation Board's Position Statement on 'Development in the Setting of the AONB (2016) states:

"The Board considers the setting of the Cotswolds AONB to be the area 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."

2.29 The Statement refers in particular to the importance of views out from the CNL, and views towards or into it from surrounding areas. It goes on to state that development proposals that affect views into and out of the CNL need to be carefully assessed to ensure that they conserve and enhance the natural beauty and landscape character of the CNL.

City of Bath World Heritage Site Management Plan and Setting SPD

2.30 The City of Bath was inscribed by UNESCO as a world heritage site in 1987. The inscription is exceptional in that it covers the entire city, not just the historic core or individual features. The City of Bath WHS Management Plan 2016-2022 sets out an approach for understanding and managing change to the WHS. The overarching vision of the plan is:

- The Outstanding Universal Value of the City of Bath World Heritage Site will be conserved and enhanced for this and future generations.
- Bath will be an exemplar of sustainable urban management, striving to balance the needs of an inventive and entrepreneurial 21st century place with the conservation and enhancement of the unique heritage which is of world-wide significance.

- It will be a centre of excellence for urban heritage management and conservation, founded on strong and effective partnerships of local, national and international communities and organisations.
- The impact upon the Outstanding Universal Value will be a key consideration in all proposals for change, recognising that small-scale incremental change can be as influential as major interventions. There will be a strong presumption against development that would harm the Outstanding Universal Value of the World Heritage Site itself, or its setting.
- Bath will be accessible and enjoyable to all; a Site that understands and celebrates its Outstanding Universal Value, beauty and character.
- World Heritage status will continue to be used to support and further the vitality and wellbeing of the local community.

2.31 In Chapter 5: Issues to be Addressed there are several objectives and actions that are pertinent to this study:

- Objective 1: Ensure that new buildings and other developments do not harm the OUV of the Site (page 31).
- Objective 2: Ensure that all relevant new policy documents take full account of the WHS and do not propose actions which would harm the OUV (page 31).
- Objective 11: Ensure that the natural setting of Bath, as a key attribute of OUV, is afforded equal importance to the built element and is protected, conserved and interpreted (page 35).
 - Action 32: Engage with regional/national/local government to ensure that sub-regional growth and new housing numbers allocated to the city respects the special characteristics of the WHS.
- Objective 17: Ensure that key decision makers have a good understanding of the OUV of the Site and their role in the management of the WHS (page 37).

2.32 In support of the management plan, The City of Bath WHS Setting Supplementary Planning Document (SPD) was adopted in August 2023. It

recognises that the setting to Bath is as important to its OUV as the built core of the city. Many WHSs have 'buffer zones', but the City of Bath WHS is unusual in having its setting mapped and protected as part of the SPD. Appendix 9 sets out the grading categories for assessing impacts of proposed changes within the setting on the OUV of the WHS. It is this that has formed the basis for the heritage impact assessment methodology as set out in this report.

Further Considerations

2.33 The study uses the detailed assessment of attributes and overall outstanding universal value of the WHS as set out in the management plan and setting SPD for the City of Bath World Heritage Site. However, Bath is unique in having two world heritage site designations: it is also part of Great Spa Towns of Europe World Heritage Site.

2.34 This second, transnational inscription spans 11 spa towns from seven different countries, led by the government of Czechia (Czech Republic). It took over ten years of collaborative discussion and planning across Europe to complete the 1,434 page Great Spa Towns of Europe World Heritage Site nomination. The submission was passed to UNESCO in January 2019. Bath's part in the transnational nomination was endorsed by Bath and North East Somerset Council in October 2018. It was inscribed on the list in 2021.

2.35 A property management plan had to be produced for the WHS as part of the inscription. It identifies seven attributes of outstanding universal value: mineral springs; spa spatial ensemble; spa architecture; therapeutic spa landscape; spa infrastructure; continuing spa function; internationalism, scientific, artistic and literary values, events and cultural tradition. These attributes apply across all towns; however, due to the recency of the inscription, how and to what extent Bath conveys these attributes has not been assessed in the same level of detail as for the City of Bath WHS. That said, ultimately the designations are both underpinned by the history of Bath as a spa town. The property boundary is the same for both, and there are clear crossovers in the headline attributes for both – for example, the green setting of the city in the hollow in the hills and the therapeutic spa landscape. As such, it is reasonable

to assume that any effects on the City of Bath WHS as a consequence of the development of the areas considered in this study is likely to result in a similar level of effect to the Great Spa Towns of Europe WHS.

2.36 Any harm identified to the Great Spa Towns of Europe WHS potentially has much wider ramifications than even the harm to the City of Bath WHS. This is because harm would not just be to Bath as part of the WHS, but to the whole Great Spa Towns of Europe inscription. This makes it internationally politically sensitive, as it could put the ten other towns that are part of this inscription at risk of losing their WHS status.

UNESCO Guidance

2.37 World heritage site inscription is an international designation. The criteria for inscription are set and assessed by UNESCO. Similarly, it has its own guidance when it comes to assessing impact, 'Guidance and Toolkit for Impact Assessments in a World Heritage Context' (UNESCO, ICCROM, ICOMOS and IUCN, 2022). Although there are clear areas of crossover with the established approach to the assessment of significance and impact in England, UNESCO operates its assessments independently of any individual country's planning system.

2.38 Section 6.9 of the guidance relates to the evaluation of impacts – positive and negative – if they have been identified. It states that “significant negative impacts on the wider heritage will generally be unacceptable, and on a World Heritage property's OUV they will always be unacceptable” (page 44). It goes on to state that “if the proposed action would have negative impacts on OUV, the report should give one of three conclusions:

- The negative impact would be negligible and raises no concerns;
- The negative impact would be significant, but with avoidance and mitigation measures it could be eliminated or minimized to an acceptable level; or

- The negative impact would be significant and could not be avoided or mitigated, so the proposed action should not proceed”.

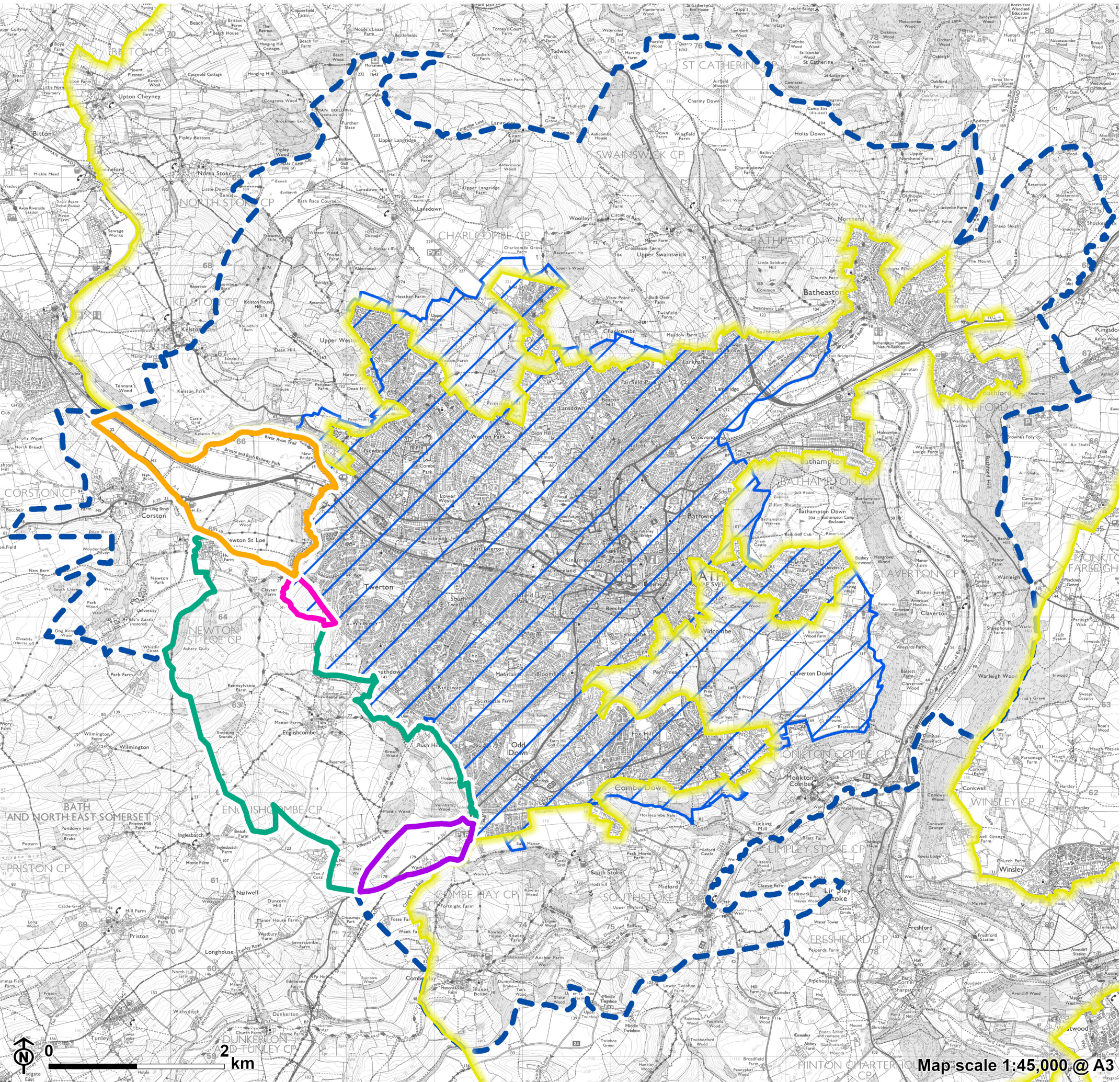
2.39 The implications of the above are that if harm is anything more than negligible and raises no concerns, it would not be considered of an acceptable level and the development should not proceed.

2.40 The subsequent paragraph in the section addresses positive impacts, but as none have been identified as part of this study and so it is not relevant. Even if positive benefits are identified, there is a fundamental difference between the NPPF and the UNESCO guidance as to how they should be treated. Whereas the NPPF allows for the balancing of harm and benefits of a proposal to establish if it is acceptable ‘in the round’, the guidance clearly states that “while the conclusions should address both positive and negative impacts, these should not be balanced against each other. The analysis needs to reveal rather than disguise the complexities of a proposed action so that potential benefits are not used to justify negative impacts on a World Heritage property” (page 45).

2.41 UNESCO will consider the impacts on the WHS of the proposed developments in line with this guidance. Given the conclusions of the study, it is reasonable to assume that they will consider the potential impact significant and their recommendation would be not to allocate the areas for any of the types of development proposed.

2.42 If the council decides to proceed and the areas are allocated, there is reasonable justification to assume that UNESCO may consider the property as ‘in danger’. There are several criterion a property may meet to be considered ‘in danger’. In this instance, it would be ‘potential danger: threatening effects of town planning’. If this was found to be the case, it may lead to the WHS being inscribed on the List of World Heritage in Danger **[See reference 1]**.

Figure 2.1: Study area



Chapter 3

Method

Scope of the Assessments

3.1 The landscape sensitivity assessment focuses on the landscape considerations associated with a variety of development types at a strategic level. The heritage impact assessment focuses on identifying the potential effect on the OUV of the City of Bath WHS. It does not consider in detail the impact on the second WHS – the Great Spa Towns of Europe – although the two are so closely aligned that affects identified for one are likely to have repercussions for the other. It also does not consider the effect on individual designated and non-designated heritage assets either through physical impact or changes to their setting. This includes scheduled monuments, listed buildings, registered parks and gardens, conservation areas, locally listed buildings, and any other non-designated heritage assets identified on the HER or by other means.

3.2 The results of the assessment provide an initial indication of the relative landscape and WHS sensitivity of defined areas to the west of Bath, using established methodologies consistent with national guidance for the respective disciplines. These results should be interpreted alongside the detailed information provided in the assessment profiles.

3.3 It is also important to note that this assessment does not provide guidance on the wide range of other planning issues that need to be considered as part of the preparation and determination of planning applications for developments.

Spatial Framework for the Assessments

3.4 The report assesses four defined 'areas' to the west of Bath that fall within the Indicative Setting of the City of Bath World Heritage Site. These potential growth areas were defined by Bath and North East Somerset Council. The brief was to carry out baseline local landscape character assessments and landscape sensitivity assessments for all four areas, and a WHS heritage impact assessment for areas 1, 2 and 3.

3.5 Each area report begins with a local landscape character assessment, drawing on the framework of the relevant character areas described in the Bathscape Landscape Character Assessment (2016). This is further refined to provide the baseline context for a detailed assessment of the impacts of potential development on landscape character and visual amenity.

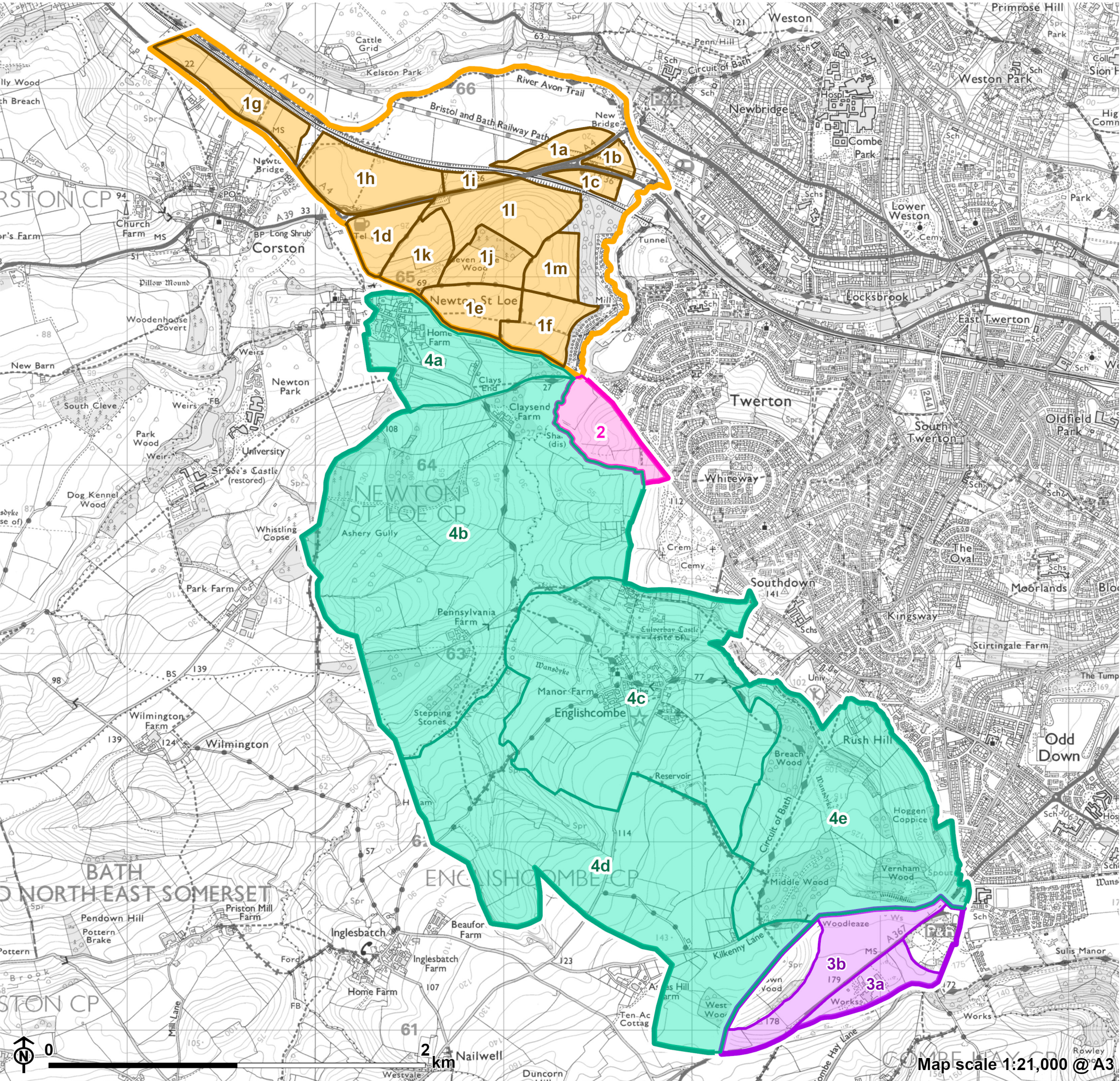
3.6 The landscape character and landscape sensitivity assessments are then followed by a heritage impact assessment (HIA) for the City of Bath WHS. The HIA draws on the set of headline attributes and sub-attributes as set out in the City of Bath Management Plan 2016-2023 and the receptors that convey those attributes as set in the City of Bath Setting SPD (2013). These were further refined to identify those applicable to the areas to provide the baseline context for the detailed assessment of the effect of potential development on the Outstanding Universal Value of the WHS.

3.7 The local landscape character assessment methodology was agreed with the B&NES Senior Landscape Architect and follows the principles of the 2014 Natural England guidance (An Approach to Landscape Character Assessment). The HIA methodology was agreed with the B&NES Conservation Officer, Senior Landscape Architect and Historic England. It follows the principles of Appendix 9 of the Setting SPD, updated to reflect more recent guidance and draws on established approaches to Environmental Impact Assessments (EIA).

3.8 The four areas were then divided into smaller land parcels to allow for more detailed assessment for both the landscape and heritage assessment.

Individual land parcels, with similar landscape characteristics, are amalgamated into landscape assessment units, where appropriate. Land subject to a risk that represents a major constraint to development was not assessed, this included land in area 1 located within Flood Zone 3 (representing the highest level of flood risk).

Figure 3.1: Landscape areas and assessment units



Landscape area

- Area 1
- Area 2
- Area 3
- Area 4

Assessment unit

- Area 1
- Area 2
- Area 3
- Area 4

Type and Scale of Developments Considered

3.9 The assessment considers the sensitivity of the landscape and setting of the WHS to the west of Bath to a variety of development types, that reflect those most likely to be put forward by developers in the relevant areas assessed.

3.10 The development types assessed, their approximate height and extent are set out below:

- Residential development (2-3 storey ranging from 9-13m in height):
 - Small scale residential – Less than 1ha (up to 50 dwellings)
 - Medium scale residential – 1-5ha (up to 250 dwellings)
 - Medium to large scale residential – 5-10ha (up to 500 dwellings)
 - Large scale residential – More than 10ha (more than 500 dwellings)
- Business park (2 storey business pavilion with an approximate height 13m):
 - Small scale business park – Less than 1ha
 - Medium scale business park – 1-5ha
 - Medium to large scale business park – 5-10ha
 - Large scale business park – More than 10ha
- Transport interchange (Park and Ride) (one storey with street lighting approximately 6m in height):
 - Small scale transport interchange – Less than 1ha
 - Medium scale transport interchange – 1-5ha (approximately 700 car parking spaces)
 - Medium to large scale transport interchange – 5-10ha (approximately 1500 car parking spaces)

- Large scale transport interchange – More than 10ha
- Purpose built student accommodation (PBSA) – 4 storey with an approximate height of 20m
- Waste transfer/recycling centre – 1.75-2ha (area 3a only)

Data Generation

3.11 Zones of Theoretical Visibility (ZTVs) were produced for each area, based on regular points across the area at elevations above ground level, reflecting the approximate heights of the different development types described above. The ZTVs are based on bare earth topography and therefore do not take account of potential screening by vegetation or buildings.

3.12 The ZTVs are shown on maps in Appendix A.

Chapter 4

Evaluating Landscape Sensitivity

4.1 This assessment draws on advice contained in Natural England's 'Approach to landscape sensitivity assessment' (Natural England 2019). It describes the term 'landscape sensitivity', within the context of spatial planning and land management, as follows:

"Landscape sensitivity may be regarded as a measure of the resilience, or robustness, of a landscape to withstand specified change arising from development types or land management practices, without undue negative effects on the landscape and visual baseline and their value."

4.2 It is a term applied to landscape character and the associated visual resource, combining judgements of their susceptibility to the specific development type/development scenario or other change being considered together with the value(s) related to that landscape and visual resource.

Assessment Criteria

4.3 Landscape sensitivity assessment requires judgements on both landscape susceptibility (how vulnerable the landscape is to change from the development type being assessed) and landscape value (consensus about importance, which can be recognised through designation as well as through descriptions within the Landscape Character Assessment).

4.4 The selection of landscape sensitivity indicators ('criteria') for this study is informed by the attributes of landscape that could be affected by the development types being considered. 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.

4.5 The following criteria headings are used for this study:

- Landform;
- Openness and enclosure;
- 'Natural' character;
- Landscape pattern and time depth;
- Landcover (including field and settlement patterns);
- Historic features (as they contribute to landscape character);
- Settlement form and edge;
- Recreational value;
- Perceptual character;
- Visual character; and
- Setting of the CNL.

4.6 Guidance and examples of higher and lower sensitivity features/attributes for applying the criteria in the landscape to the west of Bath are given for at the front of each area report and below.

4.7 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

4.8 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

4.9 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

4.10 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

4.11 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

4.12 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

4.13 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

4.14 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

4.15 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

4.16 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 CNL, 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 CNL, 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 CNL, 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 CNL

4.17 This considers the extent to which the landscape of the assessment unit forms part of the ‘setting’ of the CNL and the extent to which development could have an adverse impact on that setting. The setting of the CNL 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 2]**.

- **Lower Sensitivity:** The landscape has limited intervisibility with the CNL 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 CNL 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 CNL, and development would have an adverse impact on the landscape, scenic beauty, and special qualities of the designated landscape.

Making Overall Judgements on Landscape Sensitivity

4.18 The overall sensitivity of the assessment unit to each of the relevant development types is set out with a summary of the reasoning behind that judgment.

4.19 It is important to note that the relative importance of individual criterion varies between landscapes (due to differences in landscape character). As with all assessments based upon data and information which is to a greater or lesser extent subjective, some caution is required in its interpretation. This is to avoid the suggestion that certain landscape features or qualities can automatically be associated with certain sensitivities – the reality is that an assessment of a landscape’s sensitivity to development is the result of a complex interplay of often unequally weighted variables (or ‘criteria’).

4.20 There may be one criterion that has a strong influence on landscape sensitivity in a particular landscape, which increases the overall sensitivity score (an example is a landscape with a prominent/highly visible ridgeline, or significant coverage of semi-natural habitats). There may also be criteria that produce conflicting scores. For example, a small-scale landscape with historic field patterns may also afford greater screening of development from topography and a dense network of hedgerows.

4.21 In these situations, a professional judgement is made on overall landscape sensitivity, taking all criteria into account in the context of their importance to the landscape character and quality of that area.

Presentation of Results

4.22 The landscape sensitivity assessments for each of the four areas are presented in separate assessment reports. These are structured as follows:

Local Landscape Character Baseline

- A description of the existing landscape classification, key characteristics, along with natural, cultural and perceptual influences, and an evaluation of the key sensitivities and values of the landscape of the area.

- A map of the area, with component Bathscape Landscape Character Areas and the extent of the City of Bath WHS, the indicative setting of the City of Bath WHS.
- Illustrative photos of the area, along with maps showing landform and drainage, geology, nature and cultural heritage designations, woodland coverage, tranquillity and dark skies.

Landscape Sensitivity Criteria

- A description of the criteria used to assess landscape sensitivity, providing guidance and examples of higher and lower sensitivity features/attributes for applying the criteria.

Landscape Sensitivity Assessment

- A commentary against each criterion to inform the judgements of levels of sensitivity for each assessment unit (individual or grouped land parcels), against the relevant development scenarios, with a landscape sensitivity score given for each relevant development type (using a three-point scale).
- An overall landscape sensitivity score for each of the different development scenarios, using a five-point scale from high to low. This is accompanied by a summary discussion on the landscape sensitivity of the assessment unit to each development type, referencing particular features, attributes or locations which may be more or less sensitive. This includes a summary of any variation in contribution from across the assessment unit in individual land parcels.
- A discussion of the potential effects of development on the landscape and any mitigation and enhancement opportunities. This only applies where a landscape considered to be of medium sensitivity or lower.

Chapter 5

Evaluating WHS Significance and Sensitivity

Assessing the Heritage Value of the WHS

5.1 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).

5.2 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.

5.3 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.

5.4 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.

5.5 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 identification of receptors was based on the maps provided in the Setting SPD. Although the Historic Environment Record (HER) and National Heritage List for England (NHLE) was

also consulted as part of the baseline assessment, it was not within the scope to assess and provide an exhaustive list of potential receptors. The Setting SPD is not exhaustive either, but it is extremely thorough. It highlights the key receptors for each attribute and this was deemed sufficient for the strategic purposes of this assessment to be able to carry out a robust assessment and gauge the potential impact on the attributes.

5.6 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.

5.7 Not every assessment unit conveys all attributes. A baseline assessment for each assessment unit was carried out to establish what receptors it contained or contributed to and which attributes they conveyed. This involved running an intersectional analysis with the results of the ZTV and the map of receptors. In instances where they crossed over, this showed where there was potential intervisibility between the receptors and the sites. A more detailed assessment was then carried out to establish whether this intervisibility was incidental or whether it would affect the ability of the receptor to convey the attribute.

5.8 The receptors and the associated attribute(s) that were found to be affected are listed in the individual area reports. 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.

5.9 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.

5.10 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 Setting 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.

5.11 Accordingly, if an attribute has been identified as high then the contribution to overall OUV of the assessment unit has been considered as 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

5.12 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.

5.13 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.

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

- High adverse/beneficial:
 - The assessment unit makes a high contribution to OUV and the potential impact of the development is likely to be major.
- Medium-high adverse/beneficial:
 - The assessment unit makes a high contribution to OUV and the potential impact of the development is likely to be moderate; or
 - The assessment unit makes a medium contribution to OUV and the potential impact of the development is likely to be major.
- Medium adverse/beneficial:
 - The assessment unit makes a high contribution to OUV and the potential impact of the development is likely to be minor; or
 - The assessment unit makes a medium contribution to OUV and the potential impact of the development is likely to be moderate; or
 - The assessment unit makes a low contribution to OUV and the potential impact of the development of the area is likely to be major.
- Low-medium adverse/beneficial:
 - The assessment unit makes a medium contribution to OUV and the potential impact of the development is likely to be marginal; or

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

5.15 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.

5.16 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, page 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.

Presentation of Results

5.17 The WHS heritage impact assessments for each of the three areas are presented in separate reports, alongside the landscape character and sensitivity assessments for those areas. The heritage impact assessments are structured as follows:

Criteria for WHS Designation and Sensitivity

- A description of the criteria used for designation of a WHS.
- A summary of the attributes that comprise the OUV of the City of Bath WHS, providing guidance and examples of the way the attributes may be conveyed by different types of receptors.
- Definitions of the levels used to grade the contribution of the areas to OUV.

Assessing the Effect on Attributes and OUV

- A description of the criteria used to assess potential impact on attributes and overall level of effect, providing guidance and examples of the way attributes might be affected and how this would affect OUV.

Heritage Impact Assessment

- A commentary against each attribute that is conveyed by the assessment unit, including identification of receptors that convey the attribute. A score is given for each attribute to reflect how strongly it is conveyed by the assessment unit.
- An overall contribution of assessment unit to OUV score which considers how strongly the attributes collectively convey the outstanding universal value of the WHS. This includes a summary of any variation in contribution from across the assessment unit in individual land parcels.
- An assessment of the attributes' sensitivity to change which considers the types of changes that may affect how strongly the assessment unit conveys the attributes (and OUV).
- An assessment of the potential impacts of each development type, including a discussion of how the attributes would be affected. This is accompanied by a score ranging from none to major adverse/beneficial.

Chapter 5 Evaluating WHS Significance and Sensitivity

- The level of effect on the OUV of the WHS. This is a discussion of the overall effect on OUV and is accompanied by a score ranging from none to high adverse/beneficial.
- A discussion of planning implications, translating the level of effect into NPPF and UNESCO guidance terminology and indicating the relevant policies.

Chapter 6

Cumulative Effects

Introduction

6.1 As larger numbers of developments are built, it is increasingly necessary to consider their cumulative effects. Cumulative effects of multiple schemes are a significant issue for planning authorities. It should be recognised that if numerous developments are built, then at some point another development could tip the balance through its additional effects.

6.2 Key considerations are how different developments relate to each other, their frequency as one moves through the landscape, and their visual separation. These are most appropriately considered at the individual site level, including through the process of Cumulative LVIA.

Historic Environment

6.3 There are two ways that cumulative impact is considered in relation to the historic environment.

Impact on the OUV of the WHS of Developing More than One Land Parcel, Assessment Unit or Area

6.4 In short, the more land parcels that are developed, the greater the impact. As the assessment units have all been assessed as experiencing a high adverse effect on the OUV of the WHS from all development types, the effect of

developing more than one will be even higher. Some land parcels have been identified as being less sensitive than others to certain types of development:

- Parcel 3a to the park and ride and waste transfer/recycling centre; and
- Parcels 1b and 1c to small and medium scale residential, small and medium scale business parks, and a medium scale transport interchange.

6.5 Individually, the impact of developing these parcels would still have a medium to medium-high adverse effect on the WHS. In conjunction with other land parcels, however, the effect would be high. If multiple assessment units were developed – the whole of area 1, for example – the effect on the OUV of the WHS would be very high and substantially undermine the attributes of OUV. Development of more than one area would irreparably erase a major portion of ‘the green setting of the city in a hollow in the hills’ attribute and the status of the WHS.

6.6 This study also recognises that there has already been development constructed in the 20th century that is contrary to the attributes of OUV – the incursion into the rural surroundings of the city of the housing at Twerton, for example. Similarly, the Combe Hay Lane/Sulis Down development and potential extension. Development of the assessment units would amplify that impact and, rather than being justification for further extension, the cumulative impact on the WHS of adding to it needs to be considered.

The Impact of the Assessment Units on Multiple Heritage Assets and the Historic Environment Overall

6.7 As well as the City of Bath WHS, the city is also unique in being part of a second WHS designation, the Great Spa Towns of Europe WHS. Underpinning both designations is the history of Bath as a spa town. The property boundary is the same for both, and there are clear crossovers in the headline attributes for both – for example, the green setting of the city in the hollow in the hills and the

therapeutic spa landscape. As such, it is reasonable to assume that harm to the City of Bath WHS is also likely to result in some level of harm to the Great Spa Towns of Europe WHS.

6.8 As well as the two world heritage sites, there are also numerous other heritage assets in the vicinity of the assessment units: scheduled monuments, listed buildings, registered parks and gardens, conservation areas, and other non-designated heritage assets. The study has considered the impact on some of these individual assets only in relation to their contribution to the attributes of the WHS. As such, any development would also need to consider the impact on them as individual heritage assets.

6.9 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.

Landscape Character and Visual Amenity

6.10 The issues related to cumulative effects on landscape character and visual amenity depend on the specific characteristics of both the development proposal and the location: “Cumulative landscape and visual effects result from additional changes to the landscape or visual amenity caused by a proposed development in conjunction with other developments, or as the combined effects of a set of developments, taken together” (GLVIA 3).

- Cumulative landscape effects are effects that can impact on either the physical fabric or character of the landscape, or any special values attached to it.

- Cumulative visual effects are effects that can be caused by combined visibility, which occurs where the observer is able to see two or more developments from one viewpoint and/or the sequential effects which occur when the observer has to move to another viewpoint to see different developments.

6.11 The more assessment units to the west of Bath that are developed the greater the impact on landscape and visual amenity. Most assessment units have been assessed as having high landscape and visual sensitivity to all development types, therefore the effects of developing more than one unit will be even higher.

6.12 Some land parcels have been identified as being less sensitive than others to certain types of development. For example, parcel 3a to the park and ride and waste transfer/recycling centre and small-scale residential development, parcels 1b and 1c to small and medium size residential and business park development. Individually, the impact of development of this kind would have a lower or moderate impact on landscape and visual amenity. However, the cumulative effect of multiple developments on one parcel, is likely to be high. If multiple assessment units were developed – the whole of area 3 for example – the effect on landscape and visual amenity would increase.

6.13 It is recognised that there has already been development constructed in the 20th century that has a negative impact on landscape character and visual amenity – for example the housing at Twerton, which spills over the upper reaches of the landscape bowl containing the city of Bath and exerts an urban influence on the surrounding landscape. Development in the surrounding landscape, in area 2 for example, could amplify that impact.

6.14 The cumulative impact on the setting of the CNL also needs to be considered. Given the high sensitivity of the landscape setting of the designated landscape identified, the cumulative impact can only increase when further development is considered.

References

- 1 [UNESCO World Heritage Convention \(undated\) World Heritage in Danger](#)
- 2 [Cotswolds Conservation Board \(2016\) Cotswolds Conservation Board Position Statement – Development in the setting of the Cotswolds AONB](#)

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