

City of Bath World Heritage Site Setting Supplementary Planning Document

Consultation Report, October 2012

(Tables in section 4 updated August 2013 as indicated in italics)



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1 Early Stage consultation

The publication of the draft Regional Spatial Strategy (RSS) in 2006 included a requirement for an extension of 1,500 dwellings to the south-west of Bath. This highlighted the need to produce evidence and guidance in support of policies in the Local Plan for protecting the World Heritage Site (WHS) and its setting.

At this stage there was very limited guidance or good practice examples on protecting the setting of heritage assets or WHSs in particular. Early consultation took the form of correspondence, meetings and presentations with a view to developing an appropriate evidence base of work carried out elsewhere and in developing a methodology that would be suitable for Bath. Feedback was received from key stakeholders including ICOMOS UK, English Heritage and Bath Preservation Trust as part of this early process.

A study was subsequently initiated to inform the Examination in Public for the Regional Spatial Strategy which took place in 2007. This work was supported by further research and was refined and published as an information paper to the Core Strategy (CS) in 2009.

The work for the RSS and CS, the feedback received and the engagement with groups and individuals during this process contributed to the preparation of the consultation draft of the Supplementary Planning Document (SPD).

The WHS Steering Group has been kept informed of the progress of the work through a presentation on 21st January 2009 and a series of updates. A presentation was given to representatives from a number of UK WHSs at a meeting organised by English Heritage on 9th June 2011. Presentations were given to the Local Development Framework steering group on

Emails.

Emails were sent to statutory consultees including Parish Councils and neighbouring Councils and national and local organisations and other consultees including local landscape, planning and heritage practitioners, other relevant national and local organisations not on the statutory list above and members. The emails provided details of the consultation and where the draft SPD could be viewed including the website address.

Press Release.

A press release was issued and the consultation was publicised through interview and articles in local publications. Publicity included; this is Bath, Now Bath, Bath Chronicle, Inform, and BBC Radio Bristol.

Display at Bath City Conference 2nd May 2012.

A display raising awareness of the City of Bath WHS setting SPD work was exhibited at the Bath City Conference.

Web page

A City of Bath WHS Setting SPD page was set up on the Council's website with access to the document and the consultation form. There was also a link to the document and consultation form on the Council's 'Have Your Say' web page.

Internal Training 28th June 2012.

A training session was held for Planning Services which included a presentation and workshop.

3 Statement of Compliance with the Neighbourhood Planning Protocol

Consultation details, key Issues raised and a schedule of key changes are included in this Consultation Report in line with the Neighbourhood Planning Protocol outlined in Figure 7 on page 25 of the protocol. This consultation report therefore forms the Statement of Compliance to the Neighbourhood Planning Protocol.

4 Summary of main comments received and changes made in response
(updated August 2013 as indicated in italics)

Table 1 Key issues raised and the proposed response to each issue

<p>Comments were generally positive and supportive of the SPD which was perceived to be helpful, comprehensive, well researched and providing the means for effective protection of the City of Bath WHS and its Setting. Comments reflected careful consideration by consultees who raised a range of issues. The majority of these comments have been able to be accommodated with relatively minor amendments or additional clarification.</p>	
Issue	Response
<p>Some respondents found it difficult to find the way around</p>	<p>Provide a table showing where to find relevant information for specific purposes (see table 3 at the end of this Consultation Report) <i>Clearer explanation was provided in the introduction and the summary pages at the start of each chapter instead of an additional table</i></p>
<p>Many respondents stated that points are repeated</p>	<p>Cover each point in full only once and in other places where repetition is necessary, for example where a chapter may be read in isolation from the rest of the SPD, the point will be referred to in summary and cross referenced to the main place where it is mentioned</p>
<p>Some respondents were not clear when the impact assessment on the WHS would be required</p>	<p>The SPD outlines when a proposed development is likely to affect the OUV and will therefore require an impact assessment and also outlines when an EIA is required</p>
<p>Some respondents consider the assessment process is cumbersome and complex</p>	<p>Provide flow diagram to visually present the process for assessing impacts on the WHS setting (see table 4 at the end of this Consultation Report) <i>The table has been included in chapter 7 with minor modifications to accord with updated guidance on Landscape and Visual Impact Assessment.</i></p>
<p>Some maps are not clear</p>	<p>The clarity is improved by providing a slightly larger map on each page and shading is revised to allow map details to be visible through the shading <i>Some of the map bases have also been changed to provide greater clarity</i></p>
<p>Link maps to text</p>	<p>The relevant map numbers will be referenced in the text</p>
<p>Suggest case study to demonstrate the toolkit approach</p>	<p>A set of thumbnail plans will be provided to graphically represent the key aspects of the OUV referred to in the Supplementary</p>

	<p>Planning Document</p> <p><i>Annotated sketch views have been provided to better demonstrate significant aspects of the setting</i></p>
<p>Need to make clear that avoidance of harm / protection of the setting does not mean no change / no development</p>	<p>Paragraph 1.05 to be revised to read 'This SPD will give greater clarity and certainty in decision making affecting the WHS setting and is a key document to guide the management and enhancement of the WHS and its setting. It recognises that there will be proposals for development coming forward in areas close to the city. It is not intended to prevent appropriate development within the setting but through outlining the significance of the setting aims to inform decisions.'</p>
<p>Refer to protection afforded by AONB and Green Belt</p>	<p>Reference will be made to the role of the AONB and Green Belt in protecting setting <i>Included in paragraph 5.16</i></p>
<p>Need to expand on and emphasise other important aspects of landscape character including strengthen reference to the importance of farming / grazing to the setting also comments on other related uses (orchards, horticulture, poultry etc) in Georgian times and now, tranquillity, settlement pattern and cultural aspects</p>	<p>These will be added to the list of aspects of landscape character from paragraph 5.27 onwards</p>
<p>Some respondents wanted clear statements rather than systems, procedures and principles</p>	<p>The document cannot include requirements which could be considered as new policy.</p>
<p>Need to expand on reasons for not having a buffer zone</p>	<p>The SPD outlines the approach taken and approved by the Council which is to have specific policies for the protection of the setting in the existing Local Plan and the Core Strategy once it is adopted, supported by this SPD.</p>
<p>Some respondents referred to the importance of the green spaces within the WHS.</p>	<p>There are relevant sections in the document recognising the importance of the green spaces within the WHS. The SPD addresses those areas surrounding the WHS in accordance with the definition given in the National Planning Policy Framework and Circular 07/09</p>
<p>Review character area numbering and lettering to be consistent between documents</p>	<p>The lettering and numbering referred to is correct and an explanation will be added to clarify the different purposes differentiating between the topographical map and the character map based on existing character assessments</p>

Minor changes, corrections, spelling errors and clarification.	Minor changes for clarity and corrections have been made as required
Setting should not stop at the district boundary particularly at Freshford and Limpley Stoke	Discussions are on-going with Wiltshire Council Planners, however the evidence and approach is considered sufficient to enable the setting to be protected and the SPD will clarify that the setting may extend beyond the district boundary <i>Clarification is given in paragraph 4.05</i>
Document only refers to heritage assets linked to the OUV and ignores others such as the Victorian	Explanation will be added that in determining the effects of development in the WHS and its setting the effect of development on other heritage assets will also be determined and that a holistic view of the effects on the historic environment will be taken <i>The SPD makes clear throughout that it is dealing with the setting of the WHS and therefore concentrates on the significant aspects of the WHS</i>

Table 2 Proposed Key Changes

Page no.	Paragraph no.	Proposed change
		GENERAL
		use of capital 'S' in 'site' where referring to the WHS
		Investigate best way to access maps on the website
		Ensure each map is referenced in the text
		Liaise with neighbouring authorities where setting extends beyond the Bath and North East Somerset boundary
		Ensure references to tranquillity are clarified <i>Definition included in Appendix 10</i>
		CHAPTER 1
4	1.01	Omit third sentence 'Bath is renowned - - - the same recognition'.
4	1.01	Omit 'embodied in the core values of the site' and replace with 'of the WHS'
		CHAPTER 2
10	2.14	Omit 'policies for the protection - - - to its setting' and replace with ' <i>Policies for the protection and sustainable use of a particular WHS should apply both to the site itself and, as appropriate, to its setting, including any buffer zone or equivalent</i> ' (paragraph 10).
		CHAPTER 3
		refer to Natural Capital and the Natural Environment White Paper <i>Referenced in paragraph 3.02</i>
		include historical understanding and protection of registered battlefield at Lansdown as part of the other benefits of setting in chapter 3 <i>The battlefield (and other assets reflecting the significance of the WHS) is specifically mentioned in chapter 5 while the purpose of chapter 3 is to emphasise the other benefits of the setting such as</i>

		<i>fostering a sense of place</i>
14	3.02	Add to last sentence 'and enhancing access.'
14	3.03	Omit 1 st sentence and replace with 'There are opportunities for a range of leisure uses including walking, rambling and cycling using the network of Public Rights of Way and other routes. They include the long distance Cotswold Way, the River Avon Trail, the Bristol to Bath Railway Path and the Kennet and Avon Canal.'
		CHAPTER 5
21 and following pages	Title page	Rename chapter to 'Characteristics of the City of Bath World Heritage Site Setting'
21	Title page	Add 2 extra bullet points <ul style="list-style-type: none"> • Routes into and out of the city and the quality and character of their environs and views to and from them. • The River Avon and the Kennet and Avon Canal and the quality and character of the river and its environs and the views to and from them.
22	5.05 4 th sentence	Omit 'for example important Georgian buildings such as' and 'and Beckford's Tower' <i>The wording for Sham Castle is correct and is therefore retained while only part of the setting of Beckford's Tower, rather than the tower itself, is in the setting and this part has therefore been reworded</i>
23	5.06 3 rd sentence	Clarify that the setting of the WHS by definition is outside the WHS, that not all parts of the setting convey significance to the same degree and that the outer extent is indicated with reference to character, views and historical associations and other factors as well as the scale and nature of proposals <i>Clarified in paragraphs 4.01 – 4.04</i>
23	5.06	2nd bullet refer to dwg 4 Green Hillside and provide the methodology used for assessing the green hillside ie not just open undeveloped areas but includes well treed areas where buildings are subservient in key views. <i>Included in paragraph 5.30</i>
24	Within 5.08 – 5.33	Make clear the value of the open countryside to the setting and the containment of the city
24	Within 5.08 – 5.33	Make clear the importance of the distinctive pattern of settlements (villages) to the setting and that many are designated Conservation Areas (refer to relevant map)
24	Within 5.08 – 5.33	Make clear the importance of tranquillity (lack of noise and light) to the setting <i>Included in paragraph 5.31</i>
30	Map 4	Link Green Hillside Map with text and explain methodology ie areas visible and contributing to views from the WHS <i>Included in paragraph 5.30</i>
31	5.22	<ul style="list-style-type: none"> • Explain that map shows adaptation of earlier character assessments in order to match them up with the City-wide Character Assessment • Refer to Map 6 • Omit reference to character areas beyond B&NES boundary
31	5.23	Remove reference to the South Wraxall Plateau and just refer to it as the plateau edge linked to the wider landscape within Wilts

34	5.30	Refer to land uses associated with the expanding city ie horticulture, poultry, orchards
35	5.32	Add reference to intangible character expressed through literature, verse and period (Georgian) culture <i>Included in 5.31</i>
44	5.58	add Combe Hay as a separate Iron Age site outside the WHS
45	5.6	add Combe Hay as a separate Later Roman site outside the WHS
48	5.67 or following paragraphs	Refer to views from key routes including Wells Road, Rush Hill, Lansdown Hill. and Entry Hill as examples. <i>Importance of views from roads generally is included in 5.37</i>
		CHAPTER 6
		Refer to option of policies for specific issues <i>Included in 6.06</i>
		Refer to opportunities for sustainable agricultural practices including organic farming, community woodlands, Environmental Stewardship, community supported agriculture. <i>Included in 6.02</i>
50-52		Refer to the canal where there is reference to the river as appropriate
52	6.06	Add an additional bullet point after the Green Infrastructure Strategy: <ul style="list-style-type: none"> • Other local strategies and guidance which may be a material consideration • Projects to address issues (detrimental impacts or to enhance – ie new, management and restore / protect)
		CHAPTER 7
53	Title page	Add extra bullet point ‘The degree of detail needs to be proportionate to the scale of effect of proposals and the sensitivity or significance of the aspect of the WHS that may be affected.’
53	Title page 2 nd sentence	Change wording to ‘The need for an assessment will be dictated by the nature of any proposed development and its location in relation to attributes and heritage assets.
		<i>Minor changes have been made to accord with revised Landscape and Visual Impact Assessment Guidance particularly on assessing overall significance as a measure of both sensitivity and the scale of change and assessing sensitivity as a measure of both value and susceptibility to change</i>
		APPENDICES GENERAL
		Presentation and titles of appendices will be clearer
		APPENDIX 4
		Merge Appendices 4 and 5 so maps link with view information sheets <i>The new Appendix 3</i>
		APPENDIX 5 <i>The new Appendix 3</i>
97	Under the heading ‘Significance of Viewpoint’ – 3 rd sentence	Revise to read ‘A pleasure garden was built around the tower with a ride linking the tower and Beckford’s residence at number 20, Lansdown Crescent.’
		APPENDIX 7 <i>The new Appendix 4</i>

134		add Reverend John Skinner <i>Journals</i> .
		key needs to be opposite the relevant map
		APPENDIX 9 <i>The new Appendix 6</i>
140	Under The Upper Wells Road at the end of the second paragraph	Add "... At the Parish boundary of Lyncombe, Widcombe and Combe Hay".
		APPENDIX 13 <i>The new Appendix 9</i>
		<i>Minor changes have been made to accord with revised Landscape and Visual Impact Assessment Guidance particularly on assessing overall significance as a measure of both sensitivity and the scale of change and assessing sensitivity as a measure of both value and susceptibility to change</i>
		MAPS
	throughout	Number Maps in sequence
	throughout	Make map extent and coverage consistent
	throughout	Enlarge maps to fit A4 size
	throughout	Include a bar scale <i>Not used in order to keep maps as clear as possible</i>
		PHOTOS
		Number photos and reference them in the text <i>Captions used on photos instead so that they relate better to the text</i>

Table 3 Where to find information for specific purposes

(to go in Chapter 1)

Clearer explanation was provided in the introduction and the summary pages at the start of each chapter instead of this additional table

Purpose	Where to find the information	Page Number
The purpose and overview of the SPD	Chapter 1	03
Understanding the planning background to protection of the setting of heritage assets	Chapter 2 Appendix 2 – Planning designation maps	07 65
The benefits of the setting	Chapter 3	13
Identifying where the setting of Bath is	Chapter 4	17
Understanding the characteristics and significance of the setting (factors to consider in developing land or making other changes within the setting)	Chapter 5 <ul style="list-style-type: none"> • Introduction • Landscape character • Visual character • Historical associations 	21

	<ul style="list-style-type: none"> • Routes into and out of the City • The River Avon and the Kennet and Avon Canal 	
	General	62
	<ul style="list-style-type: none"> • Appendix 1- Statement of Outstanding Universal Value • Appendix 3 – Cherishing Outdoor Places excerpt 	69
	Landscape character	
	<ul style="list-style-type: none"> • Appendix 9 – Routes into and out of Bath 	136
	Visual character	
	<ul style="list-style-type: none"> • Appendix 4 – View-shed maps • Appendix 5 – View information sheets • Appendix 6 – Historical Illustration references • Appendix 7 – Georgian views and places • Appendix 11 – River view descriptions • Appendix 12 – Road view descriptions 	70 96 118 120 157 162
	Historical associations	XXX
	<ul style="list-style-type: none"> • Appendix 8 – HER references • Appendix 10 – Significant Historical Components 	147
Management of land in the setting of the City of Bath WHS	Chapter 6 – Management of the setting	53
Assessing the impact of proposed development or other changes affecting the setting	Chapter 7 – Impact assessment process Appendix 13 – Grading categories	55 146
General reference	Appendix 14 – Definitions Appendix 15 – References Appendix 16 – Bibliography	186 187 XXX

**Table 4 Flow Diagram for assessing impacts on the WHS setting
(to go in Chapter 7)**

The table has been included in chapter 7 with minor modifications to accord with updated guidance on Landscape and Visual Impact Assessment.

