

Batheaston Parish Council 162 and the Valley Parishes Alliance 257

Policy B4

The Valley Parishes Alliance is a non-statutory association of which the Councils of the riparian parishes in Bath and North East Somerset and Wiltshire between the City of Bath and Bradford on Avon are members.

The function of planning is to reduce uncertainty about what, where, when, by what authority, and by what resources development is permissible without being inimical to the public interest. We hold it essential that the prospective developer should be able to assess the likely acceptability of a proposed development from examination of the appropriate policies in the documents of the Local Development Framework.

This representation concerns the Avon Valley in the Green Belt east of Bath insofar as that comprises part of the predominantly open country setting of the City of Bath World Heritage Site where we consider there is a need in the public interest to delineate a buffer zone.

Certain parts of this open area are protected by the national designations of the Green Belt and the Cotswold Area of Outstanding Natural Beauty which are cartographically delineated in the adopted Bath and North East Somerset Local Plan. However, their designation is dependent on distinctive criteria relevant to protecting to protect their own character whereas different criteria would be appropriate to the designation of a buffer zone about the WHS site. It follows that the buffer zone boundaries would in only some places coincide with those of the Green Belt or AONB and, indeed, might be more widely drawn.

The state of the World Heritage Site is periodically inspected by UNESCO. Its report to the B&NES Council after its 2008 inspection stated

The State party should reinforce protection of the views to and from the City of Bath and of the attributes bearing the Outstanding Universal Value. A clear mapping of these important views from and to the World Heritage Site is necessary, as well as how those views will be protected from future developments.

With regard to the protection of the World Heritage Site the mission recommends that the State party act on the reinforced protection of the surrounding landscape to prevent any future developments which could have adverse and cumulative impact on the Outstanding Universal Value of the World Heritage Site.

We interpret the UNESCO report as a clear recommendation to designate a buffer zone. So far as it goes we support the substitute text of Policy B4 proposed in **PC42**. However, if 'setting' in PC42 be equated with 'buffer' zone in the UNESCO report the revised policy would be void for uncertainty since the LPA clearly has no intention of declaring and delineating a buffer zone which would enable the public to discern where

the protected area lies. Indeed, the likely procedure dealing with a planning application appears to be to decide on receiving a planning application whether the site would be in the WHS 'setting', an area currently to be left spatially indiscernible in any LDF document and therefore undisclosed to the public. We consider it necessary that to render this policy sound it should explicitly comply with the ICOMOS requirement by incorporating a commitment to delineate a buffer zone in the Avon valley east of Bath. In effect that would give a spatial context to the proposed paragraph 2.33a in PC44 dealing with qualitative issues attending development proposals. We realise there are probably differing views about the boundary dependent on the weight attached to features to be taken into account but that would be a matter for resolution through public participation and consultation in the formulation of the appropriate DPD we seek.

In the light of the sensitivity of the international importance of the relation of undeveloped land in the buffer zone to the WHS, in our view the zone should include the Bathampton Meadows formerly proposed Park-and-Ride site and neighbouring open land as an integral component of it. It should also take into account other land that neighbours the city on its east, north, and south sides.

Recommendation

That Policy B4 as proposed to be amended by PC42 be extended to incorporate a commitment to produce a DPD establishing a buffer zone for the WHS, stating the criteria against which proposed development within it will be assessed and incorporating a cartographic representation of its boundaries.