

# West of Bath Landscape and WHS Impact Assessment

Area 1

**Bath and North East Somerset Council**

**Final report**

Prepared by LUC

January 2024



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West of Bath Landscape and WHS Impact Assessment

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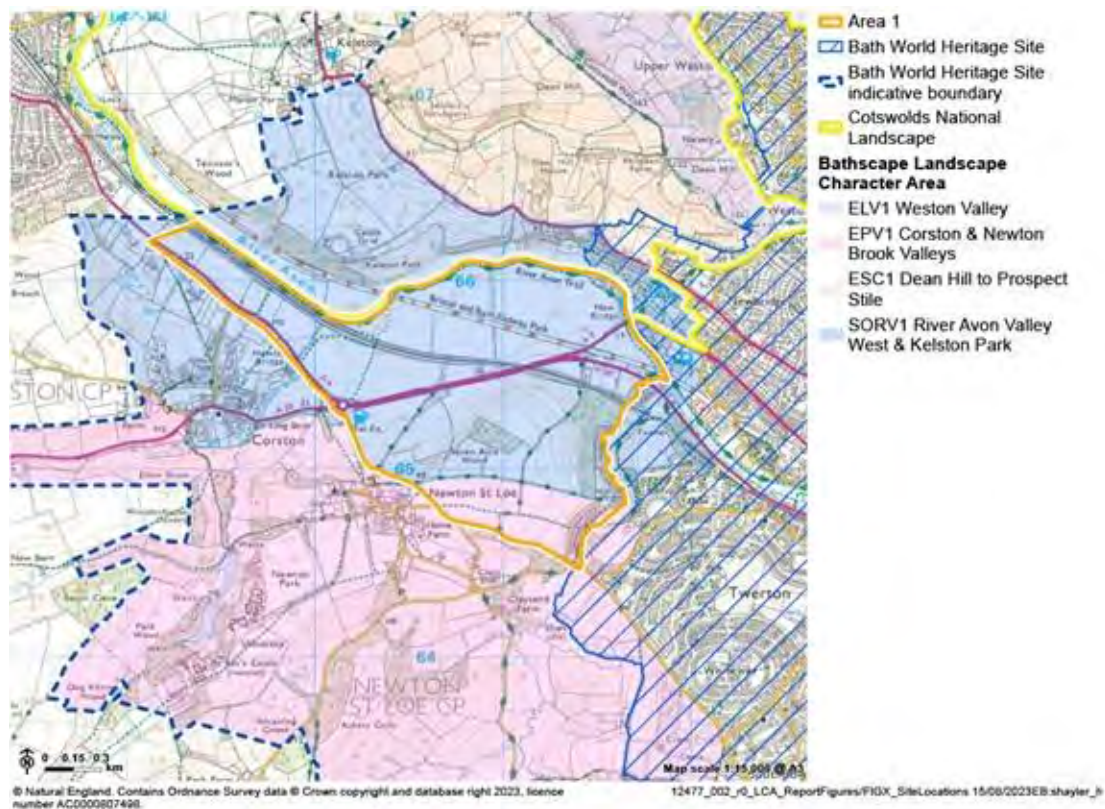
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# Chapter 1

## Local Landscape Character Baseline

Figure 1.1: Location of Area 1



## Existing Landscape Classification

1.1 In the Bathscape Landscape Character Assessment (2017), Area 1 falls within the SORV1: River Avon Valley West & Kelston Park LCA (Settled Open River Valley LCT). A small area to the south (between Newton St Loe and the settlement edge of Bath) is included in the EPV1: Corston and Newton Brook Valleys LCA (Eroded Plateau and Valleys LCT).



**1.2** In the City of Bath WHS Setting SPD (2013), Area 1 is located within the Avon Valley Zone.

## Key Characteristics

- A wide low-lying valley in the north which forms part of the floodplain of the River Avon, with open valley slopes rising to a distinctive rounded hill/plateau in the south. A steep-sided tributary valley runs along the eastern boundary.
- Clipped hedges separate regular-shaped medium to large arable fields (particularly in the south), and playing fields line the A4 in the north-east and north-west.
- Tree cover is limited, with deciduous woodland along the river and its narrow tributaries, as well as Severn Acre Wood on the hill to the south.
- An un-settled landscape, with buildings largely confined to light industrial ribbon development along the A36 in the north-east.
- An important transport corridor containing the A4 dual carriageway and GWR main line railway which disrupts local tranquillity.
- An open landscape with long views across the arable farmland of the valley, and extensive views of the surrounding countryside from the rounded hill above Newton St Loe. Views extend to Kelston Park and the Cotswolds Escarpment in the north.

# Natural Influences

## Landform, Drainage, Geology and Soils

Figure 1.2: Landform and drainage of Area 1



Figure 1.3: Bedrock geology of Area 1

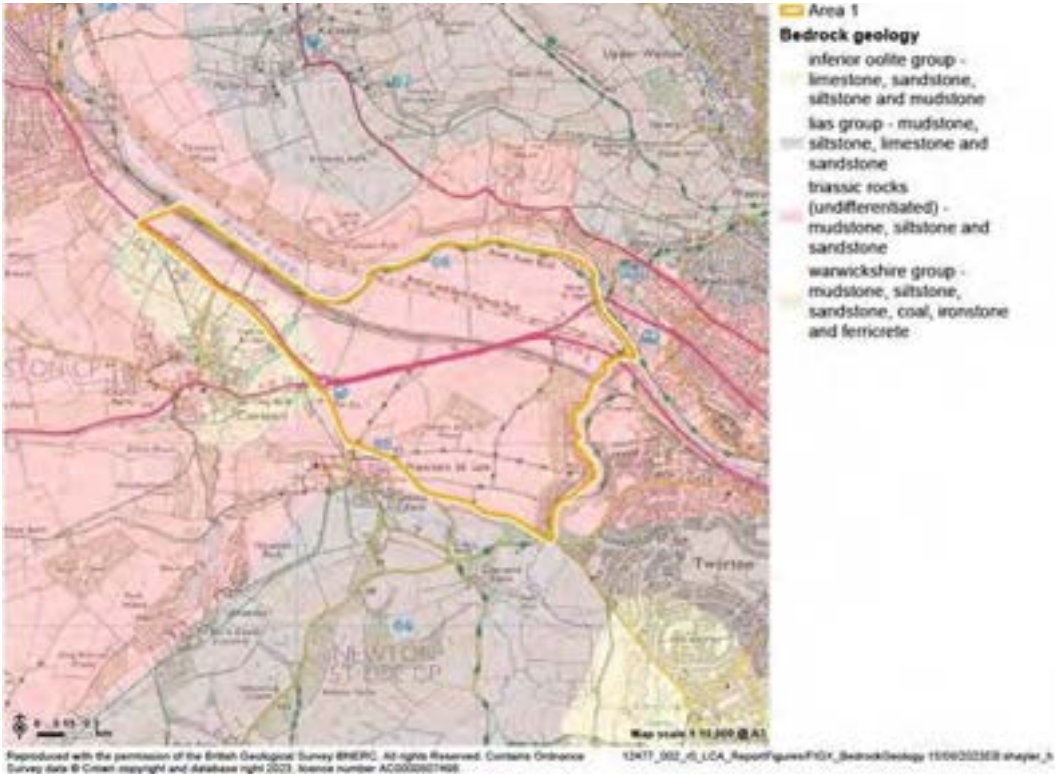
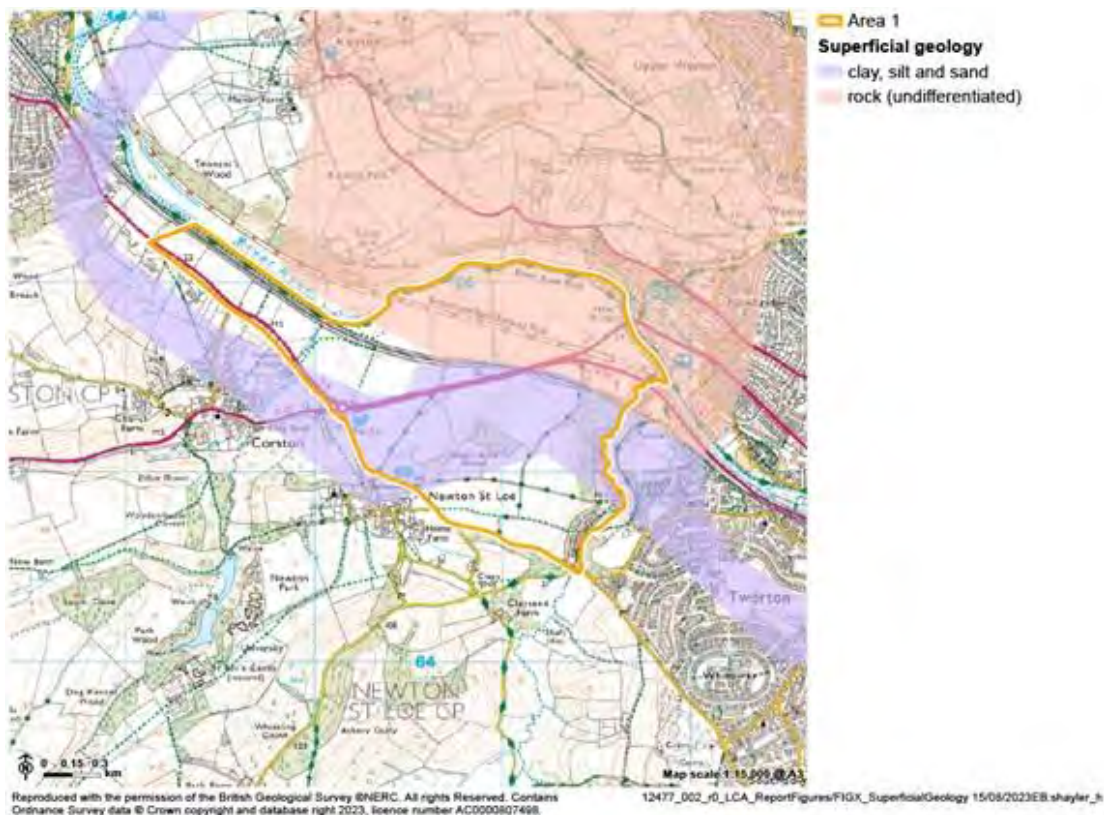


Figure 1.4: Superficial geology of Area 1



**1.3** In the north of the area, the landscape forms part of the low-lying valley to the River Avon, which butts against the edge of the steep Cotswolds Escarpment to the north (within the Cotswolds National Landscape). Leaving the constraints of the narrow, wooded Newton Brook valley on the edge of Bath in the north-east, the River Avon flows westwards and enters an area of wide floodplain. The river curves around the northern edge of the floodplain, up against the river cliff, which marks the northern extent of the area, before straightening out through a narrower and more enclosed section at the north-western end of the area. Meandering tributaries run north to the Avon, including Newton Brook to the east and Corston Brook to the west.

**1.4** The north of the area lies in the river floodplain and is overlain by loamy and clayey floodplain soils with naturally high groundwater. The valley floor is underlain by a mudstone bedrock (Mercia Mudstone Group) with superficial alluvial deposits. A geological SSSI is located by the slip road from the A4 to

Newbridge Bridge in the north-east which represents the only remaining known exposure of fossiliferous Pleistocene gravels along the River Avon.

**Figure 1.5: Low-lying northern part of Area 1, with the Cotswold Escarpment beyond**



**1.5** To the south of the A4, sweeping open, farmed slopes rise up from 15m AOD to its highest point at 70m AOD at Seven Acre Wood, forming a low hilltop/plateau that is distinctive within surrounding views (identified as a 'green hillside forming a prominent feature of the landscape setting' in the WHS SPD). Beyond the woodland to the south, shallow slopes gently descend eastwards towards the narrow, steep sided Newton Brook valley, which separates the area from the western edge of Bath. The valley slopes are underlain by Lias Group limestone, with lime-rich loamy and clayey soils and impeded drainage.

**Figure 1.6: Open slopes south of the A4 rising up to Seven Acre Wood**



**Figure 1.7: Shallow slopes south of Seven Acre Wood gently descending to the Newton Brook**



# Semi-natural Habitats

Figure 1.8: Nature conservation designations in Area 1

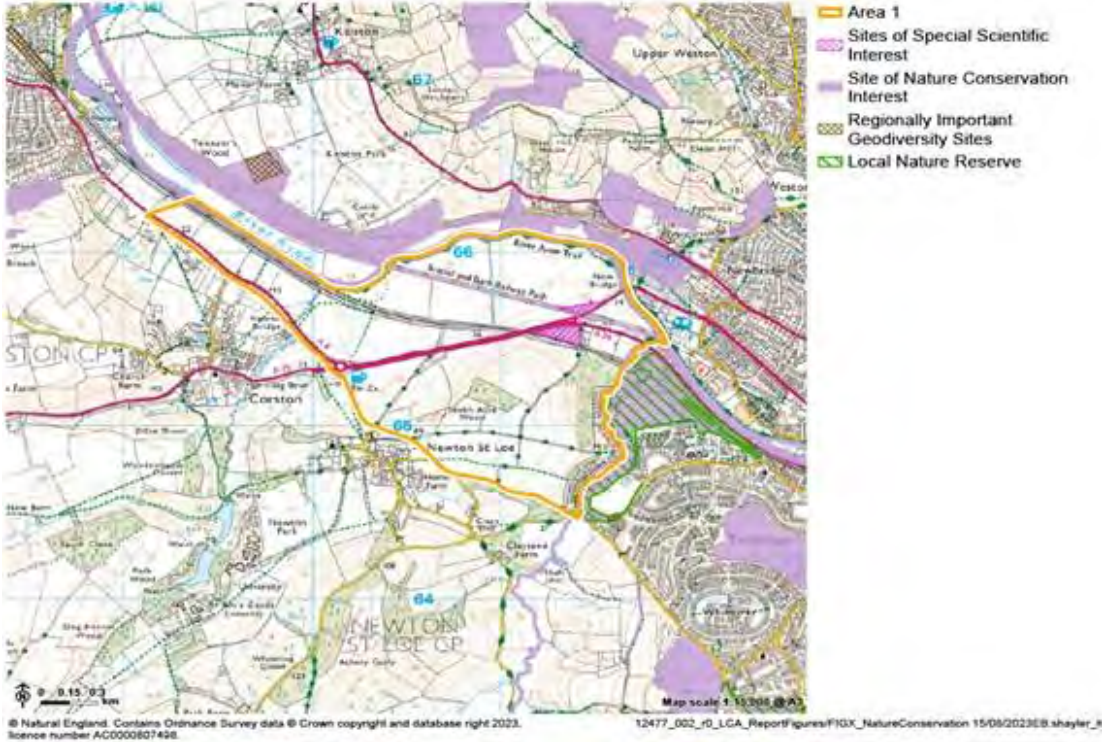
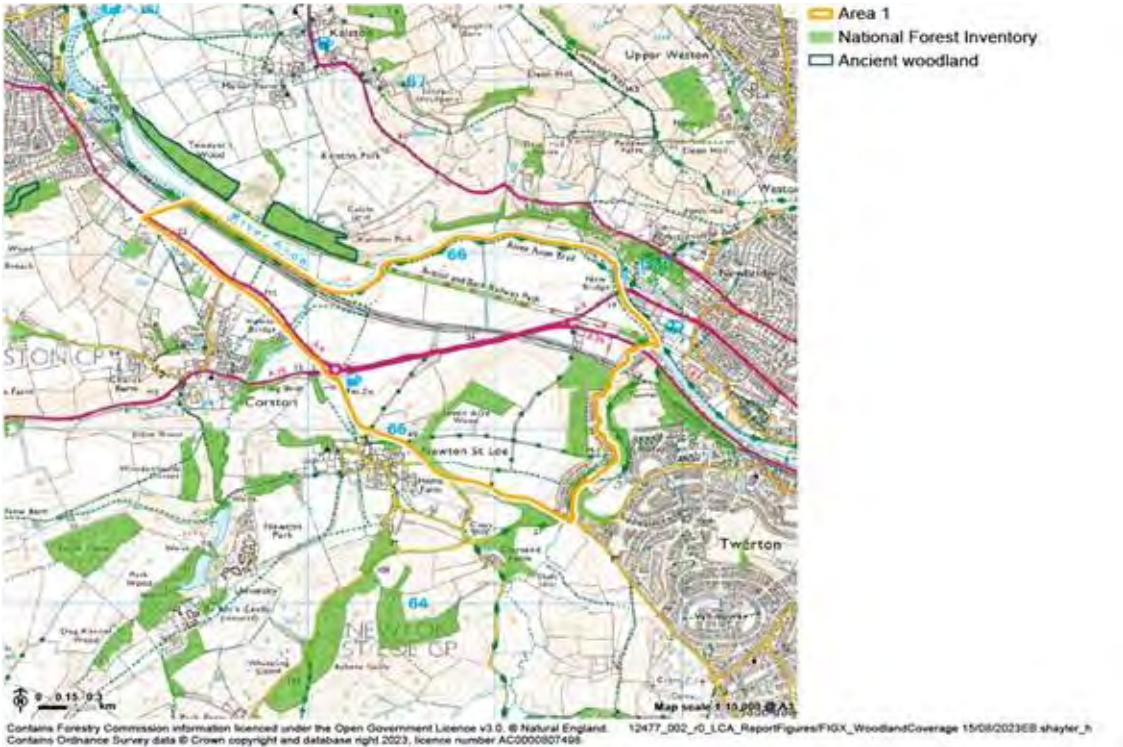


Figure 1.9: Woodland coverage of Area 1



1.6 Overall, the area has limited tree cover. However, in the north of the area, linear deciduous woodland exists along the Bristol to Bath Railway Path (designated as a SNCI and priority habitat deciduous woodland). Trees also line the A4 and a single field oak lies in the floodplain adjacent to New Bridge. Ecological interest is largely limited to the main river corridor (recognised as important to Green Infrastructure in current Policy NE1) and the steep slopes of the Newton Brook valley in the east, which are lined with broadleaf woodlands (also designated as a SNCI and priority habitat deciduous woodland). The mixed woodland at Seven Acre Wood in the south is partly priority habitat deciduous woodland, and there is significant woodland planting which has taken place, extending from Seven Acre Wood to the south-west and to the south of the brow of the hill along Pennyquick.



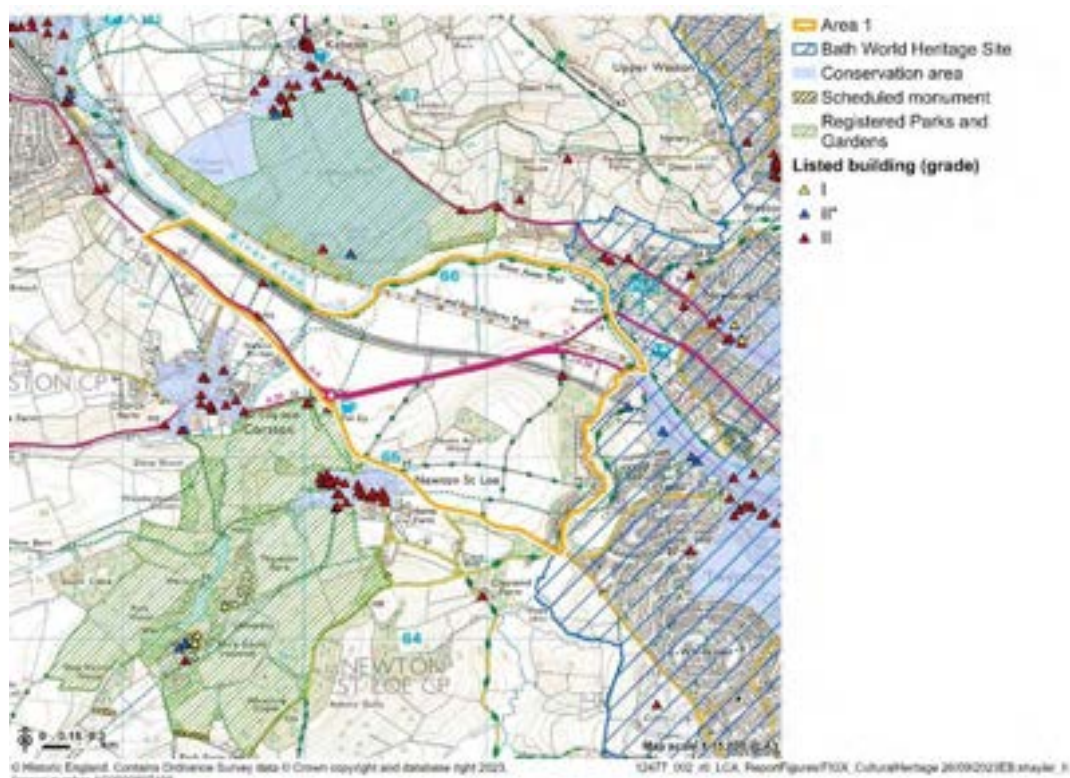
**Figure 1.10: Young woodland planting extending from Seven Acre Wood**



## Cultural Influences

### Historic Features

Figure 1.11: Cultural heritage designations in Area 1



1.7 The area has a history of coal mining and quarrying, with several pits sunk in the early 18<sup>th</sup> century close to the river valley floor in the north and a winding-house in the meadows adjoining. The pits supplied Bath with coal until supplies were exhausted in 1845. Today the former presence of mining can only be hinted at from darker areas of soil when the fields are ploughed.

1.8 Along the western boundary of the area, the Globe Inn (Grade II) was an important coaching stop on the approach to the city along the Bristol Road and now sits beside the Globe roundabout at the junction of the A4 with the A39.

**1.9** The small compact villages of Newton St Loe and Corston, lie immediately west of Area 1, while Kelston lies to the north, and their historic character is recognised through designation as Conservation Areas. The landscaped parks at Kelston Park to the north, and Newton Park to the west extend to the boundary of the area and are designated as Registered Park and Gardens (Grade II\*).

**1.10** A few historic bridges are located within the north of the area. The most notable is New Bridge (Grade II\*) which forms a historic crossing over the River Avon and part of the historic route into Bath (along the A4). Other bridges include a road bridge over the GWR main line in the north-east of the area (Grade II) and Stone Wharf Bridge (Grade II listed); a stone railway bridge designed by Brunel. A milestone (Grade II) lies along the A4 in the north-west of the area.

**Figure 1.12: New Bridge crossing over the River Avon**



**Figure 1.13: Stone Wharf Bridge**



## Land Use and Landscape Pattern

**1.11** The wide and open valley floodplain is mostly in arable cultivation (with ditched boundaries) and fields of wet grassland along the River Avon in the north and north-west of the area (which were enclosed in the medieval period or earlier). Allotments are located between the A4 and A36 in the north-east of the area. To the south of the A36 Lower Bristol Road, there is a bowls club, and the Bath Spa University playing fields and car park. Two rugby pitches belonging to Stothert & Pitt RFC also exist in the north-west of the area.

**1.12** Arable fields on the valley slopes to the south are regular in shape and are bound by clipped hedgerows with few hedgerow trees. They were enclosed in the late medieval period by local arrangement and exchange, although there has been considerable field amalgamation resulting in medium to large scale fields.

**Figure 1.14: Regular field pattern on the valley slopes in the south of Area 1**



## Settlement Pattern, Road Pattern and Recreation

**1.13** There are no settlements within Area 1 except for the Bath Mill Lodge Retreat; a holiday resort of static caravans, which runs north-south along the Newton Brook valley (along the eastern edge of the area). Ribbon development extends along the A36, consisting of light industrial units. This development and the settlement edge of Bath, which lies to the east of the area, is generally well integrated by existing vegetation. However, the suburb of Twerton spills over the upper reaches of the bowl landform containing Bath, and is visually prominent from the shallow slopes of the area in the south.

**Figure 1.15: Settlement edge of Twerton visually prominent from the southern part of Area 1**



**1.14** The valley is an important transport corridor, with the busy A4 dual carriageway, the GWR mainline railway, and disused railway route carrying the Bristol to Bath Railway Path (a National Cycle Network) routed across the floodplain. The embankments carrying these routes break up the floodplain into sections and visually isolate the tree-lined river itself which runs along the northern edge of the floodplain. A road, Pennyquick, runs along the southern boundary of the area, providing access to the village of Newton St Loe.

**1.15** The winding, tree-lined river was once an important trade route but is now a busy recreational area with boating on the river (particularly rowing), and the popular River Avon Trail walking route. The river also has permanent moorings for a few narrow boats and the Boathouse Pub is on the river edge beside New Bridge.

**1.16** Local footpaths cross the floodplain in the north, and one crosses the area close to the southern boundary. Public access is also possible along tracks

marked as 'Other routes with public access' which run around Seven Acre Wood, along the valley slopes south of the A4.

**Figure 1.16: Bristol to Bath Railway Path**



# Perceptual Influences

## Perceptual Character

Figure 1.17: Tranquillity of Area 1

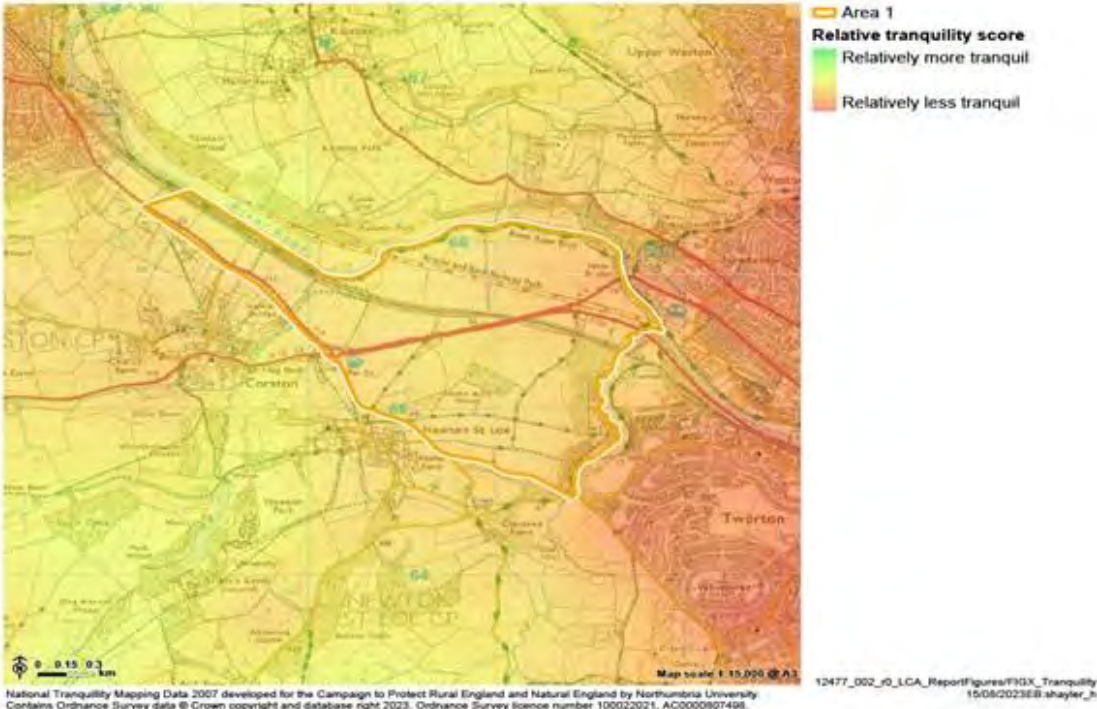
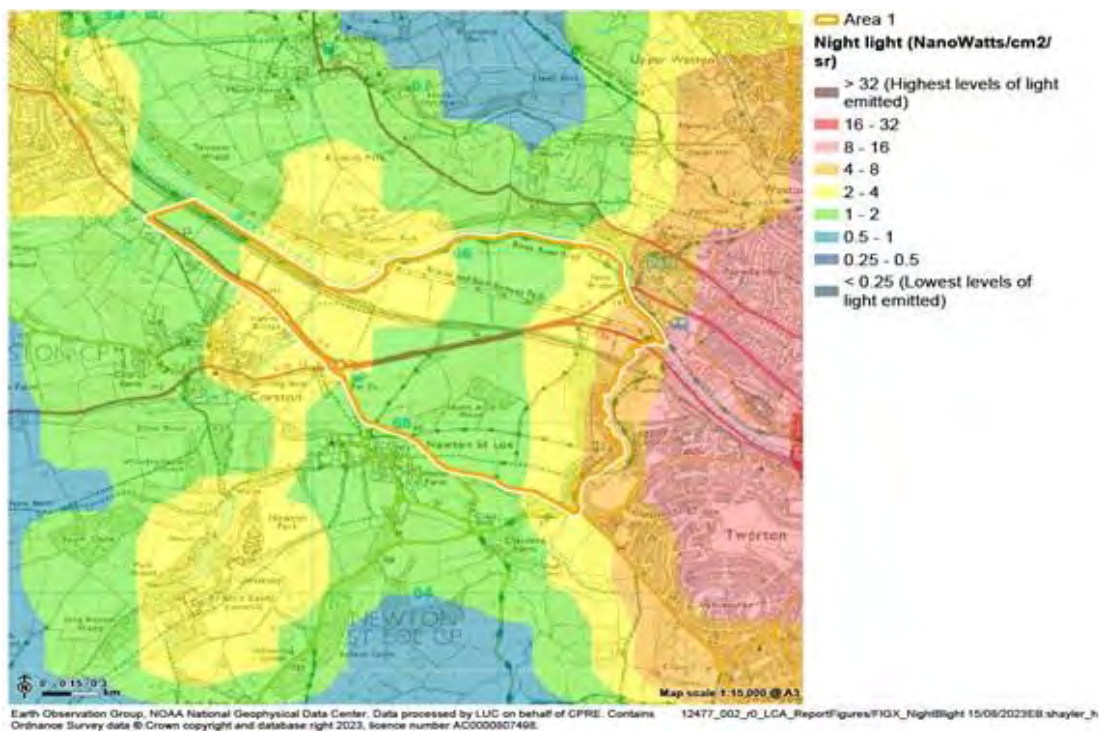




Figure 1.18: Dark skies of Area 1



**1.17** In the north of the area, there is some sense of tranquillity on the valley floor close to the river and away from the noise of the A4. However, the rural character and sense of remoteness is influenced locally by existing infrastructure, including the GWR mainline railway and the busy A4. Lighting from playing fields and the settlement edge disrupts the experience of dark skies.

**1.18** In the south of the area, the open rural character and its undeveloped nature contributes to tranquillity. However, the Pennyquick Road, its proximity to the edge of Bath and views to Twerton exert a slight urban influence on its character, with localised effects on dark skies and tranquillity.

## Visual Character

**1.19** The landscape of Area 1 is generally open in character, with views from the valley floor both east and west, although the embanked railway line and the

A4 limit views across the valley north and south. The narrower fields at the western end of Area 1 are also more enclosed.

**1.20** Driving along the A4 trunk road between Bath and Salford, there are views to the Cotswold Escarpment in the north and the valley slopes up to Seven Acre Wood to the south, but only glimpses of the river beside the Boathouse pub, and over New Bridge. Views from the River Avon Trail are enclosed to the north by the wooded river cliff but are more open over the arable fields to the south.

**1.21** Expansive views are available across the valley from tracks on the north-facing slopes of the hill south of the A4 (marked as 'Other routes with public access'), and from Pennyquick. From the south-facing slope of this hill, there are long views south into Area 4.

**1.22** In contrast the steep wooded Newton Brook Valley, which runs along the settlement edge of Bath is enclosed in character. As a result, the settlement edge of Bath is partly hidden in views due to the local landform and vegetation. Newbridge Park and Ride and the caravan park opposite are well-treed and filtered from view. However, the suburb of Twerton is visually prominent from the shallow slopes of the area.

**1.23** North of Area 1, the Cotswold Escarpment, rising steeply from the River Avon, forms a striking backdrop to views across the valley. Kelston Park is located along the lower slope of the scarp on a river terrace overlooking the River Avon valley floor. The house at Kelston Park is a landmark feature in views from both the valley floor and the valley sides.

**Figure 1.19: The house at Kelston Park overlooking the valley floor**



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

**1.24** Area 1 lies immediately to the west of the City of Bath WHS and lies within the 'Indicative Extent of the Setting of the City of Bath WHS'. The landscape south of the A4 Bristol Road is recognised as contributing to the landscape setting of Bath (Policy NE2A). The area forms part of the green backdrop to the WHS with the A4 providing a rural approach to the city.

**1.25** The Cotswolds National Landscape is located immediately to the north of Area 1, on the rising escarpment above the River Avon, and the area forms part of the rural surroundings to the nationally protected landscape. Extensive views are available from the Cotswolds National Landscape across the valley and to the north facing slopes of the valley side and landscapes further south,

including a range of views from the Cotswolds Way. There is extensive intervisibility with Kelston Park (also identified as a significant asset in the WHS SPD).

## **Key Views Identified by the City of Bath WHS Setting SPD**

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

- Viewpoint 2 – Beckford’s Tower and Lansdown Cemetery: There are commanding views of Bath both from the tower and at ground level from Lansdown Cemetery (once part of the pleasure garden) showing its setting and containment within the surrounding hills and open landscape. There are distant views of the southern slopes of the River Avon valley between Newton St. Loe and Twerton. The floodplain and elevated slopes of Area 1 are seen approximately 2.6km away.
- Viewpoint 3 – Lansdown Crescent: Located on a circular route popular in the Georgian period and now part of the Cotswold Way National Trail. Much of the view is restricted by trees in the foreground with occasional glimpses across the valley to the city and hills beyond. There are limited glimpsed views beyond intervening vegetation of the more elevated parts of Area 1 seen approximately 3.5km away.
- Viewpoints 9 and K3 – Old Newbridge Hill: From this elevated location there are framed views towards the river and Avon Valley, taking in the water meadows towards the Globe Inn, with Kelston Park on the Cotswold Escarpment in the distance. There are glimpsed views beyond intervening vegetation of parts of Area 1 along the floodplain (approximately 0.7km away), while the elevated north facing slopes and Severn Acre Wood are visible between houses along the road (approximately 1km away).

- Viewpoint 12d – Alexandra Park (looking west): An important viewpoint looking west down Shelley Road over Oldfield Park to Twerton and open countryside beyond including the elevated slopes of Area 1 and Severn Acre Wood (approximately 4km away).
- Viewpoint 15 – Sham Castle: An eye-catching folly built in 1762 on Bathampton Down, which was popular in the 18<sup>th</sup> and 19<sup>th</sup> century for its views and riding. The view is framed by trees looking from the east of the city towards the west, with countryside and hills seen in the distance, including Area 1 (approximately 5km away).
- Viewpoint 20 – Primrose Hill: On the route of the Cotswold Way, this public viewpoint overlooking the city has been significant since the 18<sup>th</sup> and 19<sup>th</sup> centuries. Beyond the city, the surrounding countryside to the west provides the backdrop, including Area 1 seen approximately 2.5km away.
- Viewpoint LBR1 – A4 Bristol Road (Saltford to Bath): From this point along the A4 on the edge of Saltford, the valley opens up with brief direct views towards the elevated slopes of Area 1 and Severn Acre Wood (approximately 2.5km away).
- Viewpoint LBR2 – A4 Bristol Road (Saltford to Bath): From this point along the A4 (which is located within Area 1), there are views north to the Cotswold Escarpment, and the valley slopes up to Seven Acre Wood are visible to the south.
- Kelston Park is listed as a site of significance from the Georgian period (WHS SPD Appendix 5 Map 11). The house at Kelston Park was designed to take advantage of the view over the Avon Valley and the owner's coal mines at Newton St Loe. The valley now provides part of the rural surroundings to the park, including Area 1 which is adjacent to the park. There are also similar views from Viewpoint K1 which is located along Kelston Road at the entrance to the park.

## Key Views from the Cotswolds National Landscape

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

## Landscape Evaluation

### Key Sensitivities and Values

- Flat low-lying Avon valley in the north of the area, which contrasts with the steep wooded Newton Brook valley to the east and Cotswold Escarpment to the north.
- The sweeping valley slopes to the south of the A4 that rise up to the prominent hilltop/plateau, with a strong sense of openness. The hillside is the first and most prominent of a sequence of hills to the west of Bath, outside of the landscape bowl that encloses the city.
- Seven Acre Wood (partly priority habitat deciduous woodland) that forms a distinctive landscape feature on the hilltop in the south.
- The River Avon and its tributaries are important landscape features and ecologically valued (designated as SNCI) with potential for wider biodiversity enhancement.
- The arable, ditched or hedged fields and absence of settlement contribute to rural character, particularly away from the busy transport corridors.

- The linear woodlands along watercourses and transport corridors which cross the area, contribute to rural character and are important ecological features (priority habitat).
- Historic importance of the route into and out of Bath along what is now the A4, and the historic bridges within the area.
- Recreational value of the PRowS and activities along the river.
- An open landscape with uninterrupted views across the Avon valley, as well as to and from the Cotswolds scarp within the Cotswolds National Landscape and from the sloping valley sides to the south of the A4.
- Forms a part of the wider rural prospect when viewed from the Cotswold Escarpment. Views from the Cotswold Escarpment is one of the special qualities of the Cotswolds National Landscape.
- Forms a part of the wider rural landscape to the City of Bath WHS.

## Chapter 2

### Criteria for assessment

#### Criteria for Landscape Sensitivity

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

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

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

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



### ■ Setting of the Cotswolds AONB

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

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

## Indicators of Landscape Sensitivity

### Landform

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

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

## Openness and Enclosure

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

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

## ‘Natural’ Character

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

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

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

## Landscape Pattern and Time Depth

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

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

## Historic Features

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

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

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

## Settlement Form and Edge

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

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

## Recreational Value

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

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

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

## Perceptual Character

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

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

## Visual Character

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

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

## Setting of the Cotswolds National Landscape

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

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

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

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

## Criteria for WHS Designation and Sensitivity

### Assessing the Heritage Value of the WHS

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

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

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

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

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

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

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



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

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

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

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

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

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

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

## Assessing the Effect on Attributes and OUV

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

- Partial or total loss of physical remains;

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

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

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

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

- High adverse/beneficial

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

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

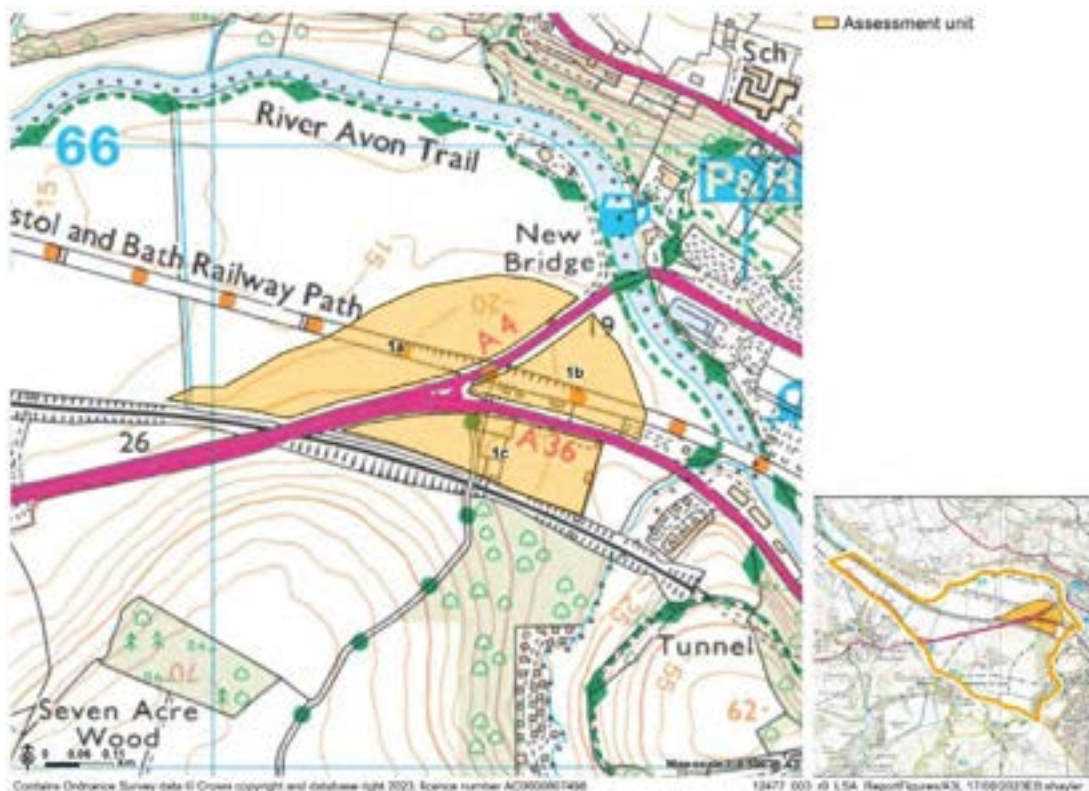
**2.28** When considering the above effects in relation to UNESCO's 'Guidance and Toolkit for Impact Assessments in a World Heritage Context' (UNESCO, ICCROM, ICOMOS and IUCN, 2022), any harm that is more than negligible is considered significant (section 6.9, p.44). If avoidance or mitigation can reduce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

## Chapter 3

### Assessment Unit 1a, 1b and 1c

## Landscape Sensitivity Assessment

Figure 3.1: Location of Assessment Unit 1a, 1b and 1c



Land subject to a risk that represents a major constraint to development was excluded from the assessment, this includes land within Area 1 (to the north of assessment unit 1a, b & c) which is located within Flood Zone 3 (representing the highest level of flood risk).

**Figure 3.2: View across parcel 1b from the Bristol to Bath Railway Path**



**Figure 3.3: View south across parcel 1a from the Bristol to Bath Railway Path**



## Commentary Against Landscape Sensitivity Indicators

### Landform

**3.1** The assessment unit forms part of the flat low-lying floodplain of the Avon with limited topographical variety.

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



## **Openness and Enclosure**

**3.3** The embanked rail line and hill to the south partly contains the landscape. Parcel 1b is partly enclosed by mature vegetation along the Bristol to Bath Railway Path and the River Avon and Parcel 1c is contained by woodland to the south (which lines the steep slopes of the Newton Book Valley).

**3.4** The landscape is open and unenclosed to the west.

**3.5** Overall, the landscape under this criterion is of moderate sensitivity to potential development types assessed for this unit. However this increases to high sensitivity for larger-scale development types (medium-large and large scale residential, purpose built student accommodation and business park development) which would expand over all parcels, including the more open and unenclosed landscape in parcel 1a to the west.

## **'Natural' Character**

**3.6** Although limited in semi-natural features overall, the deciduous woodland lining the Bristol to Bath Railway Path is designated as a SNCI.

**3.7** The geological SSSI located by the slip road from the A4 to New Bridge is also a valued natural feature.

**3.8** Overall, the 'natural' character is of moderate sensitivity to all potential development types assessed for this unit.

## **Landscape Pattern and Time Depth**

**3.9** The assessment unit is influenced by transport corridors (including the A4 Bristol Road/A36 Lower Bristol Road, and the GWR mainline railway) which has fragmented the landscape and altered the pattern.

**3.10** Parcel 1a forms part of medium to large scale arable fields resulting from modern amalgamation and bound by ditches.

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

## Historic Features

**3.12** There are relatively few visible historic features that contribute to landscape character, except for bridges on the boundary of the assessment unit. This includes New Bridge (Grade II\*) – a stone bridge over the Avon which formed part of the historic entrance into Bath, and the road bridge over the railway (Grade II).

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

## Settlement Form and Edge

**3.14** Little built development is located within the assessment unit, except for light industrial units on the north side of the A36, and buildings associated with the Bath Spa University Sports Grounds to the south of the road.

**3.15** The River Avon and Newton Brook both provide strong boundary features along the edge of the Bath. Mature vegetation filters the settlement edge, including Newbridge Park and Ride, the Bath marina and a mobile home site (Carrs Wood View), integrating it into the surrounding landscape.

**3.16** The vegetated river corridor separates the assessment unit from the edge of the City of Bath WHS (c.60m to the east of parcel 1b) and Bath Conservation Area (which extends along the A36 c.80m to the south-east of parcel 1b).

**3.17** The partly open fields of the assessment units provide a rural approach and backdrop to the Bath, making a positive contribution to the character of the settlement edge.

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

## Recreational Value

**3.19** The Bristol to Bath Railway Path, a popular cycle track and path, cuts through the middle of parcels 1a and 1b, providing recreational value.

**3.20** Public access is also possible along a track marked as 'Other routes with public access' which crosses through parcel 1c.

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

## Perceptual Character

**3.22** Transport corridors (including the busy A4 Bristol Road/A36 Lower Bristol Road, and the GWR mainline railway) fragment the landscape and exert an urban influence on its character, with localised effects on dark skies and tranquillity.

**3.23** The landscape is influenced by human activity with the allotments, railway path and light industrial development in parcel 1b, and the bowls club, Bath Spa university overflow car park and sports pitch in parcel 1c. The landscape has a more rural character to the west in parcel 1a.

**3.24** Overall, the perceptual character is of low sensitivity to potential development types assessed for this unit. However, the sensitivity increases to

moderate for larger scale developments (medium-large and large scale residential, purpose-built student accommodation and business park development) which would expand over all parcels, including the more rural landscape in parcel 1a to the west.

## Visual Character

### Views of the Assessment Unit

- The ZTV (in Appendix A) indicates that the extent of visibility is similar from potential development of up to 6m, 9m, 13m and 20m.
- There will be visibility of potential development within the assessment unit from:
  - The rail line, roads, and recreational routes crossing the valley floor, both within the assessment unit and to the west, particularly the Bristol to Bath Railway Path (which cuts through parcel 1b), the River Avon Trail and from the A4 (Road View LBR2).
  - Roads and footpaths on the valley slopes to the north and south, including the Cotswold Way National Trail (particularly from elevated viewpoints to the north-east at Penn Hill and Dean Hill), Kelston Road A431 (Road View K1) and tracks on the open hillside to the south below Seven Acre Wood.
  - The designed parkland at Kelston Park (Grade II\* Registered Park and Garden), which takes advantage of its location on the edge of the Cotswold Escarpment to exploit views out across the Avon valley.
  - Public open spaces at elevated locations within Bath where there are distant westward views over the valley landscape of the assessment unit. This includes locations such as Beckford's Tower and Lansdown Cemetery and Sham Castle (Viewpoints 2 and 15).

## Views from the Assessment Unit

- The landscape of the assessment unit is partly open with important visual relationships with surrounding areas, including the Cotswolds National Landscape.
- Potential development on the assessment unit may obscure views of:
  - The Cotswold Escarpment, which forms a prominent green backdrop rising from the River Avon to the north.
  - The house at Kelston Park, which provides a local landmark.

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

## Setting of the Cotswolds National Landscape

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

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

## Summary of Landscape Sensitivity

**Table 3.1: Sensitivity scores**

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

Development Types	Landform	Openness and Enclosure	'Natural' Character	Landscape Pattern and Time Depth	Historic Features	Settlement Form and Edge	Recreational Value	Perceptual Character	Visual Character	Setting of the CNL
interchange (Park & Ride) (<1ha)										
Medium scale transport interchange (Park & ride) (1-5ha)	Low	Moderate	Moderate	Low	Low	High	Moderate	Low	High	High
Medium to large scale transport interchange (Park & Ride) (5-10ha)	Low	High	Moderate	Low	Low	High	Moderate	Moderate	High	High
Large scale transport interchange (Park & Ride) (>10ha)	Low	High	Moderate	Low	Low	High	Moderate	Moderate	High	High

**3.28** The flat landform of the mixed-use landscape of the assessment unit is unremarkable in terms of landscape character (limited in natural and historic features) and is afforded with some enclosure from mature vegetation and surrounding landform, which reduces sensitivity to development. Its rural character is influenced locally by the busy transport corridors that cross it (including the busy A4/A36 junction and the railway on embankment), associated ribbon development along the A36, allotments, sports facilities and car parking. The Bath Spa University Sports Grounds (in parcel 1c) are well screened/filtered to the south by the railway embankment and rising topography as well as existing woodland along Newton Brook. There is potential for mitigation in this area through woodland planting, without detracting from the open landscape character of the wider floodplain. Woodland creation in this assessment unit could provide connectivity with existing woodland along the Bristol to Bath Railway Path and the Newton Brook.

**3.29** However, the partially open character of the landscape and resulting intervisibility with the Bristol to Bath Railway Path (which cuts through it), River Avon Trail, Cotswold Escarpment to the north from within the Cotswolds National Landscape, from viewpoints along the Cotswold Way to the north-east and from tracks on the rounded hill to the south, increase sensitivity to development.

## Variations in Landscape Sensitivity

**3.30** The sensitivity is increased in parcel 1a as there is a stronger sense of openness as it forms part of the wider open flood plain. It provides a rural backdrop to the Bristol to Bath Railway Path, the River Avon and River Avon Trail (which are of high recreational value) and the Cotswold Escarpment (within the nationally protected Cotswolds National Landscape). It also provides a green edge to Bath and the landscape surroundings for the historically important New Bridge.



# Landscape Sensitivity to Potential Residential Development

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

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

## Summary

**3.31** Overall, the assessment unit is judged to have a moderate sensitivity to small scale (<1ha) and medium scale (1-5ha) residential development which could physically be accommodated within parcels 1b and 1c. The urban influence of transport infrastructure associated ribbon development, allotments, sports facilities and car parking, and the semi-enclosed character of these areas lowers sensitivity, particularly where it is screened/filtered by the railway embankment, woodland along the River Avon and Newton Brook, and the treed routes of the A36 and the Bristol to Bath Railway Path.

**3.32** The assessment unit is judged to have a moderate-high sensitivity to medium-large scale (5-10ha) residential development, as development of this size would encroach into the slightly more open area of low-lying floodplain within parcel 1b and potentially parcel 1a as well which has the strongest sense

of openness within the assessment unit. These parcels demonstrate a number of characteristics which increase sensitivity, due to their visual openness, and intervisibility with elevated areas within the Cotswolds National Landscape to the north and north-east and rounded hills to the south.

**3.33** The assessment unit is judged to have a high sensitivity to large scale (5-10ha) residential development, as development of this size would increasingly encroach into the more open area of low-lying floodplain within parcel 1a. Larger scale development in this assessment unit, would also negate the role of the area as a rural approach and green edge to Bath.

## Landscape Sensitivity to Potential Purpose-Built Student Accommodation (PBSA) Development

**Table 3.3: Overall sensitivity of the assessment unit to purpose-built student accommodation (PBSA) development**

Typology	Sensitivity
Purpose Built Student Accommodation (PBSA) – 4 storey, minimal car parking (20m), well treed or parkland setting	High

### Summary

**3.34** The assessment unit is judged to have a high sensitivity to PBSA as development of this height will be highly visible in any part of the assessment unit. Development in this assessment unit, would also negate the role of the area as a rural approach and green edge to Bath.

## Landscape Sensitivity to Potential Business Park Development

**Table 3.4: Overall sensitivity of the assessment unit to Business Park development**

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

### Summary

**3.35** Overall, the assessment unit is judged to have a moderate sensitivity to small scale (<1ha) and medium scale (1-5ha) business park development which could physically be accommodated within parcels 1b and 1c. The urban influence of transport infrastructure associated ribbon development, allotments, sports facilities and car parking, and the semi-enclosed character lowers sensitivity, particularly where it is screened/filtered by the railway embankment, woodland along the River Avon and Newton Brook, and the treed routes of the A36 and the Bristol to Bath Railway Path.

**3.36** The assessment unit is judged to have a moderate-high sensitivity to medium-large scale (5-10ha) business park development, as development of this size would encroach into the slightly more open area of low-lying floodplain within parcel 1b and potentially parcel 1a as well which has the strongest sense of openness within the assessment unit. These parcels demonstrate a number of characteristics which increase sensitivity, due to their visual openness, and intervisibility with elevated areas within the Cotswolds National Landscape to the north and north-east and rounded hills to the south.

**3.37** The assessment unit is judged to have a high sensitivity to large scale (5-10ha) business park development, as development of this size would increasingly encroach into the more open area of low-lying floodplain within parcel 1a. Larger scale development in this assessment unit, would also negate the role of the area as a rural approach and green edge to Bath.

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

**Table 3.5: Overall sensitivity of the assessment unit to Transport Interchange (Park & Ride) development**

Typology	Sensitivity
Small scale Transport Interchange (Park & Ride) (<1ha) – 2 storey pavilion buildings (6m), low level surface car parking, well treed or parkland setting	Moderate
Medium scale Transport Interchange (Park & Ride) (1-5ha) – 2 storey pavilion buildings (6m), low level surface car parking, well treed or parkland setting	Moderate
Medium to large scale Transport Interchange (Park & Ride) (5-10ha) – 2 storey pavilion buildings (6m), low level surface car parking, well treed or parkland setting	Moderate to High

Typology	Sensitivity
Large scale Transport Interchange (Park & Ride) (>10ha) – 2 storey pavilion buildings (6m), low level surface car parking, well treed or parkland setting	High

## Summary

**3.38** Overall, the assessment unit is judged to have a moderate sensitivity to small scale (<1ha) and medium scale (1-5ha) transport interchange development which could physically be accommodated within parcels 1b and 1c. The urban influence of transport infrastructure associated ribbon development, allotments, sports facilities and car parking, and the semi-enclosed character lowers sensitivity, particularly where it is screened/filtered by the railway embankment, woodland along the River Avon and Newton Brook, and the treed routes of the A36 and the Bristol to Bath Railway Path.

**3.39** The assessment unit is judged to have a moderate-high sensitivity to medium-large scale (5-10ha) transport interchange development, as development of this size would encroach into the slightly more open area of low-lying floodplain within parcel 1b and potentially parcel 1a as well which has the strongest sense of openness within the assessment unit. These parcels demonstrate a number of characteristics which increase sensitivity, due to their visual openness, and intervisibility with elevated areas within the Cotswolds National Landscape to the north and north-east and rounded hills to the south.

**3.40** The assessment unit is judged to have a high sensitivity to large scale (5-10ha) transport interchange development, as development of this size would increasingly encroach into the more open area of low-lying floodplain within parcel 1a. Larger scale development in this assessment unit, would also negate the role of the area as a rural approach and green edge to Bath.

## Mitigation and Enhancement Opportunities

### Landscape Character and Features

#### Potential Effects

- Development could have a high impact due to the partly open character of the valley landscape. Higher buildings would be particularly visible in the flat and open landscape of the valley floor.
- Loss of landscape features such as mature vegetation.
- Loss of agricultural fields and hedgerow field boundaries.
- Deterioration, encroachment or loss of the geological SSSI located by the slip road from the A4 to New Bridge.
- Development could introduce new lighting resulting in night blight.
- Development could impact the rural quality of the Bristol to Bath Railway Path.

#### Mitigation and Enhancement Opportunities

- There is the potential for providing woodland planting in parcels 1b and 1c to filter new development, without detracting from the open landscape character of the wider floodplain. This could provide connectivity with existing woodland along the Bristol to Bath Railway Path and the Newton Brook. There is lower potential for mitigation in parcel 1a due to the more open character of the valley.
- Retain, protect and enhance all mature vegetation, especially mature woodlands (including priority habitat deciduous woodland) along the River Avon and its tributaries, and tree lines along transport corridors, particularly the Bristol to Bath Railway Path and the GWR railway.

- Improve the connectivity of woodlands and hedgerows through new tree planting and hedgerow corridors that are in character with the locality, using native species where possible/suitable.
- Loss of open arable fields is unavoidable as any potential development would remove land from agricultural use. However, the field boundaries (although limited) should be retained and enhanced where possible to avoid complete loss of field pattern.
- Protect the geological SSSI by setting development back from it.
- Minimise the influence of lighting associated with new development and only install outdoor lighting where necessary.
- Follow the Institute of Lighting Professionals guidance and use dark sky-friendly lighting.
- Protect deciduous woodland lining the Bristol to Bath Railway Path. Set development back from this valued recreational resource to preserve its rural character.

## **Effect on the Settlement Form and Edge of Bath**

### **Potential Effects**

- Development would not relate well to the existing settlement edge of Bath, which is well contained by the River Avon and Newton Brook and filtered by riparian woodland.
- Development could adversely impact the rural surroundings to Bath.

### **Mitigation and Enhancement Opportunities**

- Retain vegetation that filters views of the settlement edge. Locate development away from the edges of the river and brook, and more open areas of the floodplain.

## Visual Amenity

### Potential Effects

- Development could have a high impact on the expansive views to and from the assessment unit due to the partly open character of the landscape, and the prominent slopes of the valley sides to the south and Cotswold Escarpment to the north.
- Development may be seen by:
  - Pedestrians/cyclists on the Bristol to Bath Railway Path.
  - Pedestrians/cyclists on the River Avon Trail.
  - Pedestrians using footpaths crossing the valley floor, to the west of the assessment units.
  - Pedestrians on tracks on the north facing hill slope near Seven Acre Wood.
  - Pedestrians on the Cotswold Way National Trail (within the Cotswolds National Landscape), particularly at vantage points on Penn Hill and Dean Hill.
  - Motorists/cyclists using roads crossing the valley floor, particularly the A4 Bristol Road which is a key route into Bath (Road View LBR2).
  - Road users on Kelston Road A431 which runs alongside the park (Road View K1).
  - Passengers on the mainline railway between Bristol and London.
  - Visitors to Kelston Park on the Cotswold Escarpment (within the Cotswolds National Landscape).
  - Visitors and residents in Bath, at elevated locations within the city with westwards views to the surrounding countryside. Those noted in the City of Bath WHS Setting SPD include distant viewpoints from Beckford's Tower and Lansdown Cemetery (Viewpoint 2) and Sham Castle (Viewpoint 15).



## Mitigation and Enhancement Opportunities

- Retain, protect, and enhance all existing vegetation within and adjacent to any development site, including the mature vegetation along the Bristol to Bath Railway Path and riparian woodland along the River Avon and Newton Brook.
- Screen new development with additional planting, using local native species where possible/suitable, to maintain the rural character of the wider area and minimise impacts on receptors.
- Intersperse green open space and tree planting within development to help soften and break up the perceived mass of built forms, strengthen green infrastructure, and enhance the integration of built forms within the landscape.

## Views to and from the Cotswolds National Landscape

### Potential Effects

- Development could detract from the rural prospect the landscape provides to the Cotswolds National Landscape.
- Development could interrupt views to and from Kelston Park and the wooded slopes of the Cotswold Escarpment, which provide a green backdrop to the landscape of the assessment unit.
- Development could interrupt views to the house at Kelston Park, detracting from its value as a local landmark.

### Mitigation and Enhancement Opportunities

- Locate development where it is well enclosed by landform and/or vegetation and would have less influence on the views to and from the Cotswolds National Landscape.

## Chapter 3 Assessment Unit 1a, 1b and 1c

- Retain views to the Cotswolds National Landscape when looking north from the assessment unit, particularly to local landmarks such as Kelston Park.

## WHS Heritage Impact Assessment

### Commentary Against Attributes and Receptors

**3.41** This section considers the contribution of the assessment unit (see Figure 3.1: Assessment Unit 1a, 1b, 1c) to the attributes of OUV. Where the baseline assessment has identified that the assessment unit does not contain any receptors that convey an attribute, that attribute has not been discussed.

### Roman Archaeology

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

- 3. Roman and Iron Age archaeological remains beyond the city wall including hill forts, field systems, villas and funerary monuments, demonstrating the context of the Roman city (land parcel 1a only).

**3.43** Receptors for this attribute include:

- Prehistoric ring ditch and possible settlement, Newton Meadows (HER ref: 61766) (land parcel 1a).

**3.44** The parcel contains one receptor that conveys the attribute and contributes to OUV. The receptor lies wholly within parcel 1a between its northern boundary and the railway line. It is not visible on current aerial imagery or LiDAR. It is within agricultural land and so has been truncated by ploughing and potentially, given its location, overlaid with fluvial deposits. Its presence was identified by geophysical survey. The HER entry suggests it may be evidence of a settlement, although it could also relate to burials/funerary activity (for example, ploughed-out barrow) or livestock management. The level of preservation is unknown but quarrying within the parcel in the 18<sup>th</sup> century and the construction of the railway in the 19<sup>th</sup> century has resulted in much ground disturbance in the area.

**3.45** The receptor makes some contribution to the attribute as part of the archaeological record of prehistoric activity around Bath but, given the disturbance, this is limited. Although iron age remains are mentioned in sub-attribute 3, they are not noted in the statement of OUV. The asset itself has not been specifically identified in the WHS management plan or setting SPD as a contributor to OUV.

**3.46** The overall contribution of the parcel to the headline attribute is low.

## Georgian Town Planning

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

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

**3.48** Receptors for this attribute include:

- The character and appearance of the assessment unit itself as undeveloped green countryside on the edge of the city.
- Viewpoints (map 7 Setting SPD)
  - 3 Lansdown Crescent
  - 4 Approach Golf Course
  - 9 Old Newbridge Hill

- 12d Alexandra Park looking west
- 14 Bloomfield Road
- 15 Sham Castle
- 16 Widcome Hill
- 20 Primrose Hill
- 21 Ralph Allen's Drive/Meare Road
- Historic Views (map 9 Setting SPD)
  - 1d Beechen Cliff – from the western end
  - 4a The Avon Valley (west)
  - 17 Sham Castle and the Fir Forest
  - 19a Widcome Hill
  - 23 The Southern Skyline
- Road Viewpoints (map 14 Setting SPD)
  - LBR2 Saltford to Bath (A4)
  - K1 and K3 Upper Bristol Road/Bitton
  - W3 and W5 Brassknocker Road, Claverton Down Road and Widcombe Hill
- Historic sites and features
  - Kelston Park – grade II\* listed building, RPG and conservation area
  - Newton Park – grade I listed building and grade II\* RPG
  - New Bridge or Newton Bridge – grade II\*
  - Road bridge over the railway – grade II

**3.49** The OUV conveyed by this attribute derives from the deliberate, conscious design of the city. This is most evident in choreographed views of buildings and the cityscape, and its harmonious relationship with the surrounding landscape.

These views across the city intentionally took advantage of the topography and character of the surrounding landscape to enhance the city's beauty and embody the picturesque design principles that influenced its design.

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

**3.51** The assessment unit plays a more significant role in views on the western edge of the city. This includes those along historic rides/walks on the northern side of the river valley, and along the historic western route into and out of the city – such as viewpoint 9 Old Newbridge Hill, historic view 4a the Avon Valley (west), LBR2 Salford to Bath (A4), and K1 Upper Bristol Road/Bitton.

**3.52** From the west, as the countryside starts to give way to the built form of the city, the views from LBR2 and K1 create a strong sense of approaching the city boundary and entering the urban core. Conversely, as you descend the hill at viewpoint 9 and historic view 4a, views start to open up toward the surrounding countryside, creating a strong sense of transition into its rural hinterland. Although these fixed viewpoints have particular value, it is more important as part of the kinetic view that would have been experienced on this approach to the city. Receptors such as New bridge or Newton Bridge (grade II\*) and the road bridge over the railway (grade II) also help mark the arrival point and transition into the city boundaries. The assessment unit appears in these views in a form much as it has for centuries, adding to the authenticity of the attribute.

**3.53** Given the above, the physical characteristics of the assessment unit as green, undeveloped space and the contribution this makes in views along routes approaching the city, as well as the backdrop in views of the city, is

fundamental to its contribution to the attribute. Its location beyond the city limits places this character firmly as rural countryside that surrounds the city, rather than being green space consciously incorporated into the fabric of the city itself. Whilst this fortuitous role limits its contribution to an attribute that is principally concerned with the conscious arrangement of buildings, green space and landscape, it nevertheless contributes to the overarching vision to create a beautiful city. This is most evident in its contribution to the experience on entering and leaving the city to the west.

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

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

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

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

**3.56** Receptors for this attribute include:

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

- 4 Approach Golf Course
- 9 Old Newbridge Hill
- 12d Alexandra Park looking west
- 15 Sham Castle
- 16 Widcome Hill
- 20 Primrose Hill
- 21 Ralph Allen's Drive/Meare Road
- Historic Views (map 9 Setting SPD)
  - 4a The Avon Valley (west)
  - 17 Sham Castle and the Fir Forest
  - 19a Widcome Hill
  - 23 The Southern Skyline
- Road Viewpoints (map 14 Setting SPD)
  - LBR2 Saltford to Bath (A4)
  - K1 and K3 Upper Bristol Road/Bitton
  - W3 and W5 Brassknocker Road, Claverton Down Road and Widcombe Hill
- Historic sites and features
  - Kelston Park – grade II\* listed building, RPG and conservation area
  - Newton Park – grade I listed building and grade II\* RPG
  - Newton St Loe – conservation area
  - Corston – conservation area
  - The Globe Inn – grade II
  - Manor Farmhouse – grade II\*



**3.57** The OUV conveyed by this attribute derives from the spatial, visual and functional relationship Bath has with the surrounding landscape. It is entirely dependent on the physical properties of that landscape as undeveloped, green countryside, and the topography that affects how prominent it is in views. This is most evident in views from within the property boundary that take in both the city and the landscape, as they best illustrate the symbiotic relationship between built and natural form. However, views within the setting either towards the city or contained within the setting have their role to play too in reinforcing the immediacy and intimacy of countryside and city. This stems from the appearance, use (agricultural and leisure) and perception of the landscape as the rural hinterlands of the city.

**3.58** The open agricultural landscape around the city edges is felt especially keenly in views from the historic approaches to the city along Kelston Road and the A36. Here, and especially from Kelston Road, the city limits are clearly legible. Views down the valley illustrate the containment of the city within the hollow in the hills, whilst views across the valley take in the rural landscape that surrounds it. These views strongly illustrate the distinct yet complementary characters of urban city and rural countryside. Such views are particularly important in conveying the compact nature of the city contained within the Cotswold hills by its hollowed-out valley landscape and the agricultural land uses that have for centuries helped define and distinguish the countryside setting of the city from the dense urban core. The assessment unit's rural character and location at a critical point of transition into the urban fringes of the city has a strong influence on perceptions and first impressions on this approach to the city.

**3.59** The degree of separation it provides between city and associated but outlying buildings and estates also contributes to our understanding of the layout and function of the Georgian city. The area sits between the city boundary and separate, isolated farmsteads, inns, estates and settlements such as Manor Farmhouse (grade II\*), The Globe Inn (grade II), Kelston Park (grade II\* listed building, RPG and CA), Newton Park (grade I listed building and grade II\* RPG), Newton St Loe and Corston (both conservation areas containing multiple listed buildings). The legibility of receptors such as this within an agricultural setting helps to convey the distinct historic pattern and character of

rural development within the landscape. The low-density, more organic and open form of settlement within the setting of the city contrasts with the formal, high-density form of city development within the hollow.

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

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

## Overall Contribution of Assessment Unit to OUV

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

Attribute	Contribution
Roman Archaeology	Low
Hot Springs	None
Georgian Town Planning	Medium
Georgian Architecture	None

Attribute	Contribution
The Green Setting of the City in the Hollow in the Hills	High
Georgian Architecture Reflecting 18 <sup>th</sup> Century Social Ambitions	None
Overall contribution of the assessment unit to OUV	High

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

## Variations in Contributions to OUV

**3.63** The contribution of parcel 1a is higher due to the existence of Roman archaeology within its boundary and its retention of pastoral use. The western half of parcel 1c also has a strong agricultural character. Although all the parcels contribute due to their open, undeveloped nature, these parcels convey the attributes more strongly due to the continuation of historic land use within.

## Attribute Sensitivity to Change and Potential impact

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

## Roman Archaeology Sensitivity to Change

**3.65** Due to the physical nature of archaeological remains, the sensitivity of the attribute to change in relation to this assessment unit is dependent on the

location of potential development and whether the receptor will be physically affected. The attribute is extremely sensitive to direct physical impact on receptors, regardless of the type of development. Development that avoids physical impact on the receptors will have less or no impact.

## **Georgian Town Planning Sensitivity to Change**

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

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

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

**3.68** In relation to this assessment unit, the attribute is sensitive to change that will affect its character and appearance and how it appears in views that convey this attribute. Development that changes the character of the unit from undeveloped countryside to urban development will fundamentally alter its

character and the contribution it makes as part of the green backdrop in views of the historic cityscape, and views within the setting of the WHS that convey its rural character.

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

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

## Potential Impact of Residential Development

Table 3.7: Potential impact of residential development

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

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

**3.72** There are individual land parcels where some development types would have a lower, moderate impact. For example, small scale (>1ha) and medium scale (1-5ha) residential development could physically be accommodated within parcels 1b and 1c without impacting on archaeological remains. In addition, both units have areas of existing development that could be replaced by small or medium sized residential developments, which would have less of an impact than developing previously undeveloped land.

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

## Potential Impact of Purpose-built Student Accommodation (PBSA) Development

Table 3.8: Potential impact of purpose-built student accommodation (PBSA) development

Typology	1a	1b	1c	Overall Potential Impact on Assessment Unit
Purpose Built Student Accommodation (PBSA) – 4 storey, minimal car parking (20m), well treed or parkland setting	Major adverse	Major adverse	Major adverse	Major adverse



**3.74** There is the potential for a major adverse impact on the ability of the assessment unit to convey the attributes resulting from the development of PBSA. This development type would be highly visible from key views within and toward the WHS and fundamentally change the character and appearance of the unit from undeveloped countryside to urban development. The height and large floorplate is not in-keeping with the established character of building types and settlements within the setting of the WHS. Even the creation of a well-treed and parkland setting around the building would change the open, agricultural character of the assessment unit and the way it appears in views. It would establish development beyond they historic city limits that would affect the historic approaches and points of entry/exit to the city. The extension of urban development into this area would affect the containment of the city within the hollow in the hills.

## Potential Impact from Business Park Development

Table 3.9: Potential impact from business park development

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

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

**3.76** There are individual land parcels where some development types would have a lower, moderate impact. For example, small scale (>1ha) and medium scale (1-5ha) development could physically be accommodated within parcels 1b and 1c without impacting on archaeological remains. In addition, both units have areas of existing development that could be replaced by small or medium sized business park developments, which would have less of an impact than developing previously undeveloped land.

**3.77** However, the form of the development – the outline heights of the two-storey pavilion buildings, the larger floorplates, the surface car parking and planting – is inconsistent with the attributes conveyed by the unit and would fundamentally alter its character as the rural landscape setting to the city. It would be visible in key views across and toward the city, altering the green backdrop/foreground that conveys its rural location and contributes to its aesthetic values. It would establish development beyond their historic city limits that would affect the historic approaches and points of entry/exit to the city. It would extend the city beyond the hollow in the hills and affect its sense of containment. It would introduce a built form that is incongruous with historic settlement patterns and building types. Consequently, any development of this type would have an adverse impact, but with some locations resulting in a higher level than others.

## Potential Impact from Transport Interchange (Park & Ride) Development

Table 3.10: Potential impact from transport interchange (park & ride) development

Typology	1a	1b	1c	Overall Potential Impact on Assessment Unit
Medium scale Transport Interchange (Park & Ride) 700 car parking spaces	Major adverse	Moderate adverse	Moderate adverse	Major adverse
Large scale Transport Interchange (Park & Ride) 1500 car parking spaces	Major adverse	Major adverse	Major adverse	Major adverse

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

**3.79** The assessment unit is judged to have a moderate sensitivity to a medium scale transport interchange for parcels 1b and 1c. Development in these parcels would avoid impact on archaeological remains. In addition, both have already been partially developed through their use as sports facilities and the commercial units to the north of the A36 in parcel 1b, redevelopment of which would have less of an impact than developing previously undeveloped land. However, the formalisation of the area into a transportation hub would further change its character and appearance and affect views of and towards the city.

## Level of Effect on the WHS

**Table 3.11: Summary of the level of effect on the OUV of the WHS**

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

**Chapter 3** Assessment Unit 1a, 1b and 1c

Development Type	Overall Contribution of Assessment Unit to OUV	Overall Potential Impact on the Ability of the Assessment Unit to Convey Attributes	Level of Effect on the OUV of the WHS
Medium scale transport interchange (Park & Ride) (1-5ha)	High	Major adverse	High adverse
Large scale transport interchange (Park & Ride) (>10ha)	High	Major adverse	High adverse
Waste transfer/recycling centre (1.75-2ha)	N/A	N/A	N/A

## Level of Effect on the OUV of the WHS

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

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

**3.82** With regard to the impact on the attribute of Roman archaeology, as noted above harm may be averted by avoiding direct physical impact on the receptor. If this was unavoidable, then mitigation/offsetting in the form of recording may be possible.

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



such, the addition of trees within the fieldscape of the unit may further contribute to the change in the character of the unit as open agricultural land.

**3.84** This is not to say that the assessment unit cannot take any development. Individual, bespoke buildings or small, more open grained collections of buildings would be more in-keeping with the settlement pattern and open, rural character of the landscape and so could potentially be more easily accommodated, depending on the site. But development of the type proposed that extends the city limits and draws its urban form and character out into its rural surroundings is always going to be contrary to the attributes of OUV.

## Planning Implications

### National Planning Policy Framework (NPPF)

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

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

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

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

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

**3.90** The slightly lower medium-high adverse effects that might be experienced from development solely on less sensitive parts of the assessment unit may be considered less than substantial in NPPF terms, albeit at the higher end of the spectrum. This would need considering in line with paragraph 202 of the NPPF, which requires the public benefits of the proposal to be weighed against the harm. Paragraphs 199 and 200 would continue to apply, along with paragraph 206.

## **UNESCO Guidance**

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

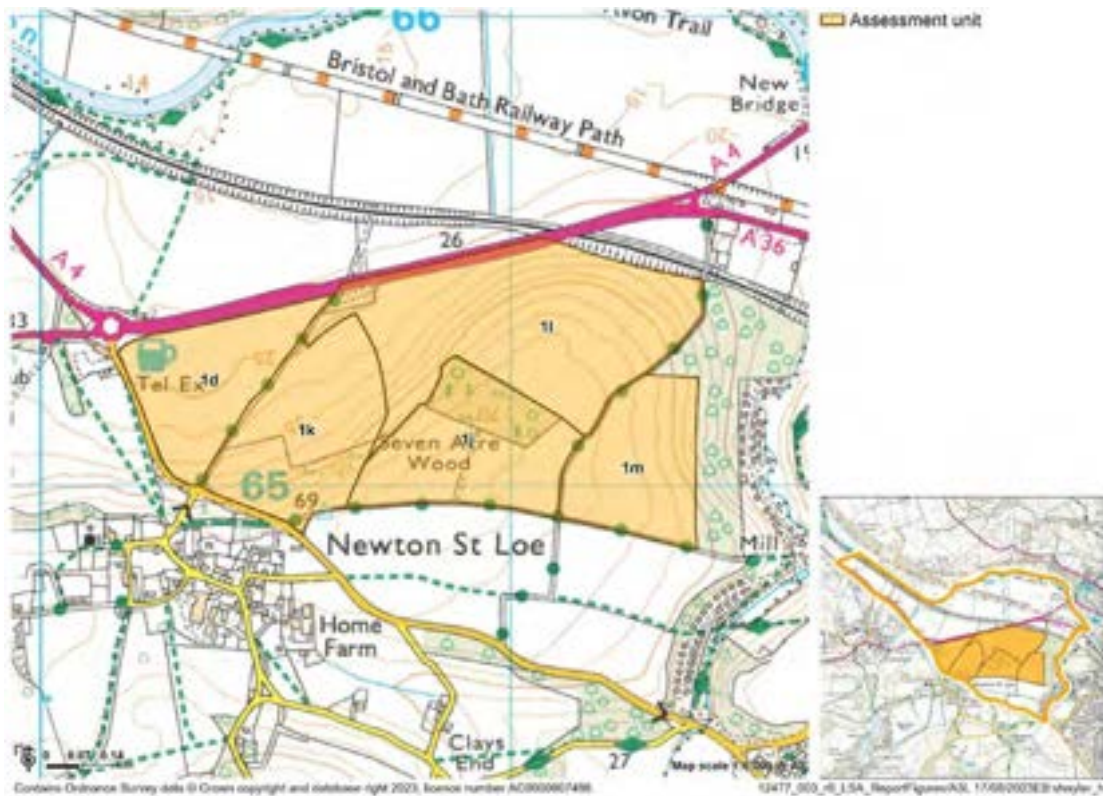
**3.92** For development to be considered acceptable, the level of negative effect would have to be reduced to negligible. The slightly lower medium-high adverse effects that might be experienced from development solely on less sensitive parts of the assessment unit is still unlikely to result in a significant enough reduction in negative impact to meet this, and so is likely to still be considered significant by UNESCO.

# Chapter 4

## Assessment Unit 1d, 1j, 1k, 1l and 1m

### Landscape Sensitivity Assessment

Figure 4.1: Location of Assessment Unit 1d, 1j, 1k, 1l and 1m



**Figure 4.2: View from the south-western edge of the assessment unit looking across parcel 1k and parcel 1l**



**Figure 4.3: View from the south-western edge of the assessment unit looking across parcel 1d (seen in front of the A4)**



**Figure 4.4: View across parcel 1j towards Seven Acre Wood**



## Commentary Against Landscape Sensitivity Indicators

### Landform

**4.1** The assessment unit comprises a low hilltop/plateau south of the River Avon valley which forms a distinctive landform feature. The hillside is the first and most prominent of a sequence of hills to the west of Bath, outside of the landscape bowl that encloses the city. It is identified as a 'green hillside forming a prominent feature of the landscape setting' in the WHS SPD.

**4.2** Steep slopes to the north and east form part of the River Avon valley side and the Newton Brook valley side respectively, providing strong topographical variety.

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

## **Openness and Enclosure**

**4.4** Elevated and exposed slopes with low clipped hedgerows results in a strong sense of openness.

**4.5** There is a small degree of local enclosure within parcel 1j, provided by Seven Acre Wood.

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

## **'Natural' Character**

**4.7** Although limited in semi-natural features overall, Seven Acre Wood is partly priority habitat deciduous woodland on the hilltop and forms a prominent feature. Young woodland extends from Seven Acre Wood to the south-west.

**4.8** Priority habitat deciduous woodland also covers the steep valley sides running down to the Newton Brook along the eastern edge.

**4.9** Overall, the 'natural' character is of moderate sensitivity to all potential development types assessed for this unit.

## **Landscape Pattern and Time Depth**

**4.10** Medium to large scale arable fields have resulted from modern amalgamation bound by clipped hedges.



**4.11** Overall, the landscape pattern and time depth is of low sensitivity all potential development types assessed for this unit.

## Historic Character

**4.12** There are relatively few visible historic features that contribute to landscape character, except for the road bridge over the railway (Grade II) on the north-eastern boundary and the Globe Inn (Grade II) on the north-western boundary.

**4.13** Overall, the historic character is of low sensitivity to all potential development types assessed for this unit.

## Settlement Form and Edge

**4.14** The vegetated corridor of the Newton Brook provides a strong boundary feature along the edge of Bath and the City of Bath WHS (c.140m east of parcel 1m). This woodland partly filters the settlement edge, including Bath Mill Lodge Retreat and housing within the lower extent of Twerton, integrating it into the surrounding landscape. However, some of Twerton spills over the upper reaches of the landscape bowl containing the city and can be seen above the tree line.

**4.15** The Penyquick road separates the assessment unit from the edge of the Newton St Loe Conservation Area (which extends along the road c.20m to the south of parcels 1d and 1k). Steep rising landform and woodland along the road largely restricts intervisibility. The assessment unit forms a large proportion of the gap between Bath and Newton St Loe.

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

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

## Recreational Value

**4.18** No public rights of way cross the assessment unit. Public access is possible along tracks marked as 'Other routes with public access' which surround Seven Acre Wood.

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

## Perceptual Character

**4.20** The assessment unit has an open rural character and its undeveloped nature contributes to tranquillity. However, transport corridors (including the busy A4 Bristol Road and the GWR mainline railway) and views to the urban edge of Twerton exert an urban influence on its character, with localised effects on dark skies and tranquillity.

**4.21** Overall, the perceptual character is of moderate sensitivity to all potential development types assessed for this unit.

## Visual Character

### Views of the Assessment Unit

- The ZTV (in Appendix A) indicates that the extent of visibility is similar from potential development of up to 9m, 13m and 20m.
- There will be visibility of potential development within the assessment unit from:

- The tracks on the open hillside within the assessment unit (below Seven Acre Wood) and the surrounding roads and rail line, including from the A4 (Road Views LBR1 and LBR2).
- Footpaths crossing the valley floor to the north, particularly the Bristol to Bath Railway Path and Avon Trail.
- Footpaths crossing through Newton Park to the south-west.
- Roads and footpaths on the valley slopes to the north, including the Cotswold Way National Trail (particularly from elevated viewpoints at Penn Hill, Dean Hill and Kelston Round Hill) and Kelston Road A431 (City of Bath WHS Setting SPD Road View K1).
- The designed parkland at Kelston Park (Grade II\* Registered Park and Garden), which takes advantage of its location on the edge of the Cotswold Escarpment to exploit views out across the Avon valley.
- Public open spaces at elevated locations within Bath where there are distant westward and north-westwards views over the valley landscape of the assessment units. This includes locations such as Beckford's Tower and Lansdown Cemetery, Lansdown Crescent, Old Newbridge Hill, Alexandra Park (looking west), Sham Castle and Primrose Hill (City of Bath WHS Setting SPD Viewpoints 2, 3, 9/K3, 12d, 15 and 20).

## Views from the Assessment Unit

- The landscape of the assessment unit has an open visual character with important visual relationships with surrounding areas, including the Cotswolds National Landscape.
- Potential development on the assessment units may obscure views of:
  - The Cotswold Escarpment, which forms a prominent green backdrop rising from the River Avon to the north.
  - The house at Kelston Park, which provides a local landmark.

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

## Summary of Landscape Sensitivity

**Table 4.1: Sensitivity scores**

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

**4.23** The arable landscape of the assessment unit is limited in natural and historic features, its rural character is slightly influenced locally by the busy transport corridors along the northern boundary and views to Twerton, and it does not have recreational value, which reduces sensitivity to development.

**4.24** However, the prominent hill (with Severn Acre Wood on top) and steep slopes, the rural backdrop the landscape provides to the Bristol to Bath Railway Path, the River Avon Trail and part of the rural prospect from the Cotswold Escarpment (within the nationally protected Cotswolds National Landscape), as well as the green edge it provides to Bath and its detachment from the city, increase its sensitivity. The open character of the landscape and resulting intervisibility with the escarpment to the north from within the Cotswolds National Landscape, from viewpoints along the Cotswold Way to the north and north-east, and from westward and north-westward facing views within the city, also increase sensitivity to development. The assessment unit also forms a large proportion of the gap between Bath and Newton St Loe.

## **Variations in Landscape Sensitivity**

**4.25** Parcel 1d is relatively flat and is bordered by the A4, the A4/A39 roundabout which detract from rural character, slightly lowering landscape sensitivity.

## Landscape Sensitivity to Potential Residential Development

**Table 4.2: Overall sensitivity of the assessment unit to residential development**

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

### Summary

**4.26** The assessment unit is judged to have a high sensitivity to small scale (<1ha), medium scale (1-5ha), medium-large scale (5-10ha) and large scale (>10ha) residential development, as development of any size would be incongruous within the open rural landscape and detached from the edge of the city. The prominent landform of the assessment unit would result in development being widely visible, particularly from views within Bath that look westwards and views southwards from the Cotswolds National Landscape. Development in this assessment unit, would also negate the role of the area as a rural approach and green edge to Bath.

## Landscape Sensitivity to Potential Purpose-Built Student Accommodation (PBSA) Development

**Table 4.3: Overall sensitivity of the assessment unit to purpose-built student accommodation (PBSA) development**

Typology	Sensitivity
Purpose Built Student Accommodation (PBSA) – 4 storey, minimal car parking (20m), well treed or parkland setting	High

### Summary

**4.27** The assessment unit is judged to have a high sensitivity to PBSA, as development of this height will be highly visible in any part of the assessment unit. Development in this assessment unit, would also negate the role of the area as a rural approach and green edge to Bath.

## Landscape Sensitivity to Potential Business Park Development

**Table 4.4: Overall sensitivity of the assessment unit to Business Park development**

Typology	Sensitivity
Small scale Business Park (<1ha) – 2 storey pavilion buildings (13m), low levels of surface car parking, well treed or parkland setting	High

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

## Summary

**4.28** The assessment unit is judged to have a high sensitivity to small scale (<1ha), medium scale (1-5ha), medium-large scale (5-10ha) and large scale (<10ha) business park development, as development of any size would be incongruous within the open rural landscape and detached from the edge of the city. The prominent landform of the assessment unit would result in development being widely visible, particularly from views within Bath that look westwards and views southwards from the Cotswolds National Landscape. Development in this assessment unit, would also negate the role of the area as a rural approach and green edge to Bath.



## WHS Heritage Impact Assessment

### Commentary Against Attributes and Receptors

**4.29** This section considers the contribution of the assessment unit (see Figure 4.1: Assessment Unit 1d, 1j, 1k, 1l, 1m) to the attributes of OUV. Where the baseline assessment has identified that the assessment unit does not contain any receptors that convey an attribute, that attribute has not been discussed.

### Roman Archaeology

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

- 3. Roman and Iron Age archaeological remains beyond the city wall including hill forts, field systems, villas and funerary monuments, demonstrating the context of the Roman city.

**4.31** Receptors for this attribute include:

- Possible Roman occupation site, SE of Seven Acre Wood, Newton St Loe (land parcel 1j).
- Roman Road (land parcel and 1l).
- Possible Roman metalled trackway, Newton St. Loe (land parcel 1l).
- Newton St. Loe Roman villa (land parcel 1l).

**4.32** The assessment unit contains four receptors that convey the attribute and contribute to OUV. The receptors lie within the assessment unit and are not visible on current aerial imagery or LiDAR. They lie within agricultural land and so have potentially, given its location, been at least partially overlaid by colluvium (slope-wash and downhill soil creep resulting from centuries of agricultural activity). Their presence was identified by geophysical surveys. The HER entries suggests the remains may be evidence of an occupation site and

villa. The level of preservation is unknown. The receptors make some contribution to the attribute as part of the archaeological record of prehistoric and Roman activity around Bath particularly with regard to illustrating rural Roman/Romano-British settlement and the road network connecting Aquae Sulis with the rest of the Roman province. Roman remains are specifically noted in the statement of OUV and the asset type has been identified in the WHS management plan or setting SPD as a contributor to OUV.

**4.33** The overall contribution of the parcel to the headline attribute is medium.

## Georgian Town Planning

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

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

**4.35** Receptors for this attribute include:

- The character and appearance of the assessment unit itself as undeveloped green countryside on the edge of the city.
- Viewpoints (map 7 Setting SPD)
  - 3 Lansdown Crescent
  - 4 Approach Golf Course

- 9 Old Newbridge Hill
- 12d Alexandra Park looking west
- 14 Bloomfield Road
- 15 Sham Castle
- 16 Widcome Hill
- 20 Primrose Hill
- 21 Ralph Allen's Drive/Meare Road
- Historic Views (map 9 Setting SPD)
  - 1d Beechen Cliff – from the western end
  - 4a The Avon Valley (west)
  - 8 Lansdown
  - 17 Sham Castle and the Fir Forest
  - 19a Widcome Hill
  - 23 The Southern Skyline
- Road Viewpoints (map 14 Setting SPD)
  - LBR1 and LBR2 Salford to Bath (A4)
  - K1, K2 and K3 Upper Bristol Road/Bitton
  - W3 and W5 Brassknocker Road, Claverton Down Road and Widcombe Hill
- Historic sites and features
  - Seven Acre Wood
  - Kelston Park – grade II\* listed building, RPG and conservation area
  - Newton Park – grade I listed building and grade II\* RPG
  - New Bridge or Newton Bridge – grade II\*
  - Road bridge over the railway – grade II

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

**4.37** In most of these views the assessment unit is not a critical factor – it has not been manipulated to form a component of the composition and is not the focal point of it either. Its role is incidental as part of the backdrop to the subject of the view or, for those views intended to be more generalised, as part of the panorama. However, land parcels 1j and 1m and part of 1l and 1k have all been identified as part of the green hillsides forming prominent features of the landscape setting of the WHS (map 5 of the SPD). Parcels 1j and 1l convey these attributes more strongly due to their topography, positioning and the presence of Seven Acre Wood, which is clearly identifiable from historic viewpoint 17 at Sham Castle, for example. As such, the area contributes to this attribute more strongly than other less visually prominent parts of the setting.

**4.38** The assessment unit plays a more significant role in views on the western edge of the city, particularly parcel 1l. This includes views along historic rides/walks on the northern side of the valley, and along the historic western route into and out of the city – such as viewpoint 9 Old Newbridge Hill, historic view 4a the Avon Valley (west), LBR1 and LBR2 Saltford to Bath (A4), and K1 Upper Bristol Road/Bitton.

**4.39** From the west, as the countryside starts to give way to the built form of the city, the views from LBR2 and K1 create a strong sense of approaching the city boundary and entering the urban core. Conversely, as you descend the hill at viewpoint 9 and historic view 4a, views start to open up toward the surrounding countryside, creating a strong sense of transition into its rural hinterland. Although these fixed viewpoints have particular value, it is more important as part of the kinetic view that would have been experienced on this approach to the city. Receptors such as New bridge or Newton Bridge (grade II\*) and the road bridge over the railway (grade II) also help mark the arrival point and

transition into the city boundaries. The assessment unit appears in these views in a form much as it has for centuries, adding to the authenticity of the attribute.

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

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

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

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

- 42. The compact and sustainable form of the city contained within a hollow of the hills.
- 43. The distinct pattern of settlements, Georgian houses and villas in the setting of the site, reflecting the layout and function of the Georgian city.
- 44. Green, undeveloped hillsides within and surrounding the city.
- 45. Trees, tree belts and woodland predominantly on the skyline, lining the river and canal, and within parkland and gardens.
- 46. Open agricultural landscape around the city edges, in particular grazing and land uses which reflect those carried out in the Georgian period.

**4.43** Receptors for this attribute include:

- The character and appearance of the assessment unit itself as undeveloped green countryside on the edge of the city.
- Viewpoints (map 7 Setting SPD)
  - 3 Lansdown Crescent
  - 4 Approach Golf Course
  - 9 Old Newbridge Hill
  - 12d Alexandra Park looking west
  - 15 Sham Castle
  - 16 Widcome Hill
  - 20 Primrose Hill
  - 21 Ralph Allen's Drive/Meare Road
- Historic Views (map 9 Setting SPD)
  - 4a The Avon Valley (west)
  - 8 Lansdown
  - 17 Sham Castle and the Fir Forest
  - 19a Widcome Hill
  - 23 The Southern Skyline
- Road Viewpoints (map 14 Setting SPD)
  - LBR1 and LBR2 Salford to Bath (A4)
  - K1, K2 and K3 Upper Bristol Road/Bitton
  - W3 and W5 Brassknocker Road, Claverton Down Road and Widcombe Hill
- Historic sites and features
  - Seven Acre Wood

- Kelston Park – grade II\* listed building, RPG and conservation area
- Newton Park – grade I listed building and grade II\* RPG
- Newton St Loe – conservation area
- Corston – conservation area
- The Globe Inn – grade II
- Manor Farmhouse – grade II\*
- Claysend Farmhouse – grade II

**4.44** The OUV conveyed by this attribute derives from the spatial, visual and functional relationship Bath has with the surrounding landscape. It is entirely dependent on the physical properties of that landscape as undeveloped, green countryside, and the topography that affects how prominent it is in views. This is most evident in views from within the property boundary that take in both the city and the landscape, as they best illustrate the symbiotic relationship between built and natural form. However, views within the setting either towards the city or contained within the setting have their role to play too in reinforcing the immediacy and intimacy of countryside and city. This stems from the appearance, use (agricultural and leisure) and perception of the landscape as the rural hinterlands of the city.

**4.45** The open agricultural landscape around the city edges is felt especially keenly in views from the historic approaches to the city along Kelston Road and the A36. Here, and especially from Kelston Road, the city limits are clearly legible. Views down the valley illustrate the containment of the city within the hollow in the hills, whilst views across the valley take in the rural landscape that surrounds it. These views strongly illustrate the distinct yet complementary characters of urban city and rural countryside. Such views are particularly important in conveying the compact nature of the city contained within the Cotswold hills by its hollowed-out valley landscape and the agricultural land uses that have for centuries helped define and distinguish the countryside setting of the city from the dense urban core. The assessment unit's rural character and location at a critical point of transition into the urban fringes of the city has a strong influence on perceptions and first impressions on this

approach to the city. Parcel 1j also has within it a woodland area known as Seven Acre Wood which conveys attribute 45 particularly well by forming part of the prominent treed skyline from the east.

**4.46** The assessment unit also makes a strong contribution in views from roads, rides and paths on the western edge and northern side of the river valley. Here, the city limits are legible and the distinct yet complementary characters of urban city and rural countryside strongly experienced. Such views are particularly important in conveying the compact nature of the city contained within the Cotswold hills by its hollowed-out valley landscape and the agricultural land uses that have for centuries helped define and distinguish the countryside setting of the city from the dense urban core. The assessment unit's rural character and location at a critical point of transition into the urban fringes of the city has a strong influence on perceptions and first impressions on this approach to the city.

**4.47** The degree of separation it provides between city and associated but outlying buildings and estates also contributes to our understanding of the layout and function of the Georgian city. The area sits between the city boundary and separate, isolated farmsteads, inns, estates and settlements such as Claysend Farmhouse (grade II), Manor Farmhouse (grade II\*), The Globe Inn (grade II), Kelston Park (grade II\* listed building and RPG), Newton Park (grade I listed building and grade II\* RPG), Newton St Loe and Corston (both conservation areas containing multiple listed buildings). The legibility of receptors such as this within an agricultural setting helps to convey the distinct historic pattern and character of rural development within the landscape. The low-density, more organic and open form of settlement within the setting of the city contrasts with the formal, high-density form of city development within the hollow.

**4.48** The ability to appreciate these features as separate but related entities is emphasised by the rural character of the intervening landscape – that is, it is not space that has been consciously integrated into the fabric of the city but is rural in character. This helps us understand the value of the property as a historic landscape rather than a group of disparate assets. Those that date from the 18<sup>th</sup> and 19<sup>th</sup> centuries – a critical point of development for the city as we see it



today – are even more significant, as they help us experience and understand it in a similar way to the Georgian resident/visitor. This illustrative contribution is not as dependent on views. The spatial relationship, the density, ratio and distribution of asset types all add to the authenticity of the landscape and how well it conveys its past uses and connections with the city.

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

## Overall Contribution of Assessment Unit to OUV

**Table 4.5: Summary of the contribution of assessment units to attributes/OUV**

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

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

## Variations in Contributions to OUV

**4.51** The contribution of parcels of 1j, 1l and 1m are higher due to their inclusion on Map 5 showing the green hillsides forming prominent features of the landscape setting. Additionally, parcel 1d makes less of a contribution as it does not contain any of the archaeological remains mentioned above. However, all the parcels make a high contribute overall due to their open, undeveloped nature and continuation of historic land use within.

## Attribute Sensitivity to Change and Potential impact

**4.52** This section considers the sensitivity to change of the assessment unit, first by looking at sensitivity in relation to each receptor, and then in relation to each proposed development type. Where the baseline assessment has identified that the assessment unit does not contain any receptors that convey an attribute, that attribute has not been discussed.

## Roman Archaeology Sensitivity to Change

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

## Georgian Town Planning Sensitivity to Change

**4.54** In relation to this assessment unit, the attribute is sensitive to change that will affect its character and appearance and how it appears in views that convey

this attribute. Development that changes the character of the unit from undeveloped countryside to urban development will fundamentally alter its character and the contribution it makes to the beauty of the city as part of the green backdrop in views of the historic cityscape.

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

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

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

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

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

## Potential Impact of Residential Development

Table 4.6: Potential impact of residential development

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

**4.59** Overall, there is the potential for a major adverse impact from all sizes of residential development on the ability of the assessment unit to convey the attributes. All land parcels within the assessment unit have been identified as highly sensitive to the type of development proposed.

**4.60** There are individual land parcels where some development types would not affect all attributes to the same extent. For example, parcels 1d and 1k do not contain any archaeological remains. However, the form of the development – the outline heights and densities – is inconsistent with the attributes of Georgian town planning and ‘the green setting of the city in the hollow in the hills’ conveyed by the unit, and so the overall impact would still be major adverse.

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

## Potential Impact of Purpose-built Student Accommodation (PBSA) Development

Table 4.7: potential impact of purpose-built student accommodation (PBSA) development

Typology	1d	1j	1k	1l	1m	Overall Potential Impact on Assessment Unit
PBSA – 4 storey, minimal car parking (20m), well treed or parkland setting	Major adverse	Major adverse	Major adverse	Major adverse	Major adverse	Major adverse

**4.62** There is the potential for a major adverse impact on the ability of the assessment unit to convey the attributes resulting from the development of PBSA. This development type could have a physical impact on archaeological remains and would be highly visible from key views within and towards the WHS. It would fundamentally change the character and appearance of the unit from undeveloped countryside to urban development. The height and large floorplate is not in-keeping with the established character of building types and settlements within the setting of the WHS, and even the creation of a well-treed and parkland setting around the building would change the open, agricultural character of the assessment unit and the way it appears in views. It would establish development beyond the historic city limits that would affect the historic approaches and points of entry/exit to the city. The extension of urban development into this area would affect the containment of the city within the hollow in the hills.



## Potential Impact from Business Park Development

Table 4.8: Potential impact from business park development

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

**4.63** Overall, there is the potential for a major adverse impact from all sizes of business park development on the ability of the assessment unit to convey the attributes. All land parcels within the assessment unit have been identified as highly sensitive to the type of development proposed.

**4.64** There are individual land parcels where some development types would not affect all attributes to the same extent. For example, parcels 1d and 1k do not contain any archaeological remains. However, the form of the development – the outline heights of the two-storey pavilion buildings, the larger floorplates, the surface car parking and planting – is inconsistent with the attributes of Georgian town planning and ‘the green setting of the city in the hollow in the hills’ conveyed by the unit, and so the overall impact would still be major adverse.

**4.65** It would fundamentally alter its character as the rural landscape setting to the city. This type of development would be visible in key views across and toward the city, altering the green backdrop/foreground that conveys its rural location and contributes to its aesthetic values. It would establish development beyond their historic city limits that would affect the historic approaches and points of entry/exit to the city. It would extend the city beyond the hollow in the hills and affect its sense of containment. It would introduce a built form that is incongruous with historic settlement patterns and building types. Consequently, any development of this type would have an adverse impact, but with some locations resulting in a higher level than others.

## Potential Impact from Transport Interchange (Park & Ride) Development

Typology	1d	1j	1k	1l	1m	Overall Potential Impact on Assessment Unit
Medium scale Transport Interchange (Park & Ride) 700 car parking spaces	Major adverse	Major adverse	Major adverse	Major adverse	Major adverse	Major adverse
Large scale Transport Interchange (Park & Ride) 1500 car parking spaces	Major adverse	Major adverse	Major adverse	Major adverse	Major adverse	Major adverse

**4.66** Overall, there is the potential for a major adverse impact from both sizes of transport exchange on the ability of the assessment unit to convey the attributes.

**4.67** There are individual land parcels where the development type would not affect all attributes to the same extent. For example, parcels 1d and 1k do not contain any archaeological remains. However, the form of the development is inconsistent with the attributes of Georgian town planning and 'the green setting of the city in the hollow in the hills' conveyed by the unit, and so the overall impact would still be major adverse.

**4.68** Whilst development in 1d and 1k may avoid physical contact with archaeological remains, the formalisation of the area into a transportation hub would change its character and appearance and affect views of and towards the city. It would introduce a built form that is incongruous with historic settlement patterns and building types. Consequently, any development of this type would have an adverse impact.

## Level of Effect on the WHS

**Table 4.9: Summary of the level of effect on the OUV of the WHS**

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

**Chapter 4** Assessment Unit 1d, 1j, 1k, 1l and 1m

Development Type	Overall Contribution of Assessment Unit to OUV	Overall Potential Impact on the Ability of the Assessment Unit to Convey Attributes	Level of Effect on the OUV of the WHS
Medium scale transport interchange (Park & Ride) (1-5ha)	High	Major adverse	High adverse
Large scale transport interchange (Park & Ride) (>10ha)	High	Major adverse	High adverse
Waste transfer/recycling centre (1.75-2ha)	N/A	N/A	N/A

## Level of Effect on the OUV of the WHS

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

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

**4.71** With regard to the impact on the attribute of Roman archaeology, as noted above harm may be averted by avoiding direct physical impact on the receptor. If this was unavoidable, then mitigation/offsetting in the form of recording may be possible. For the attributes of Georgian town planning and ‘the green setting of the city in a hollow in the hills’, however, there are no ways to avoid harm resulting from the development of the assessment unit. As noted above, harm will potentially be less with smaller scale development but still not avoidable. Mitigation for any residual harm (once the harm has been minimised through size/height) in the form of screening with vegetation is unlikely to be appropriate in these circumstances. The archaeological record for the landscape suggests land on this side of Bath has been in cultivation since at least the Roman occupation of the area. As such, the addition of trees within the fieldscape of the unit may further contribute to the change in the character of the unit as open agricultural land.

**4.72** This is not to say that the assessment unit cannot take any development. Individual, bespoke buildings or small, more open grained collections of buildings would be more in-keeping with the settlement pattern and open, rural character of the landscape and so could potentially be more easily accommodated, depending on the site. But development of the type proposed that extends the city limits and draws its urban form and character out into its rural surroundings is always going to be contrary to the attributes of OUV.

## Planning Implications

### National Planning Policy Framework (NPPF)

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

**4.74** 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.

**4.75** 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’.

**4.76** 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.

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

## **UNESCO Guidance**

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

**4.79** For development to be considered acceptable, the level of negative effect would have to be reduced to negligible. The slightly lower medium-high adverse effects that might be experienced from development solely on less sensitive parts of the assessment unit is still unlikely to result in a significant enough reduction in negative impact to meet this, and so is likely to still be considered significant by UNESCO.

# Chapter 5

## Assessment Unit 1e and 1f

### Landscape Sensitivity Assessment

Figure 5.1: Location of Assessment Unit 1e and 1f



**Figure 5.2: View across parcel 1e**



**Figure 5.3: View across Assessment Unit 1e and 1f from a footpath south-west of Twerton**



## Commentary Against Landscape Sensitivity Indicators

### Landform

**5.1** The assessment unit comprises shallow slopes, forming an extension to the distinctive plateau south of the River Avon valley, gently sloping eastwards towards the Newton Brook valley. The hillside is the first and most prominent of a sequence of hills to the west of Bath, outside of the landscape bowl that encloses the city. It is identified as a 'green hillside forming a prominent feature of the landscape setting' in the WHS SPD.

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

### Openness and Enclosure

**5.3** Elevated and exposed slopes with low clipped hedgerows results in a strong sense of openness.

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

### 'Natural' Character

**5.5** Overall, the assessment unit is limited in semi-natural features. Young woodland lies along the western edge (along Pennyquick) and there is a buffer strip of scrub located along the eastern edge.

**5.6** Priority habitat deciduous woodland covers the steep valley sides running down to the Newton Brook at the north-eastern corner.

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

## **Landscape Pattern and Time Depth**

**5.8** Medium scale arable fields have resulted from modern amalgamation bound by clipped hedges.

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

## **Historic Character**

**5.10** There are no visible historic features recorded in the assessment unit and so historic character is of low sensitivity to all potential development types assessed for this unit.

## **Settlement Form and Edge**

**5.11** The vegetated corridor of the Newton Brook provides a strong boundary feature along the edge of Bath and the City of Bath WHS (c.150m to the east of parcel 1f). The woodland partly filters the settlement edge, including Bath Mill Lode Retreat and housing within the lower extent of Twerton, integrating it into the surrounding landscape. However, some of Twerton spills over the upper reaches of the bowl containing the city and can be seen above the tree line.

**5.12** The Penyquick road separates the assessment unit from the edge of the Newton St Loe Conservation Area (which extends along the road c.20m to the

south-west of parcel 1e). Low vegetation along the boundary of the Conservation Area results in some intervisibility between the assessment unit and a dwelling with a traditional orchard. The assessment unit forms a large proportion of the gap between the Bath and Newton St Loe.

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

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

## Recreational Value

**5.15** A local footpath crosses east to west through the middle of parcels 1e and 1f.

**5.16** Public access is also possible along tracks marked as 'Other routes with public access' which run along the northern boundary and between parcels 1e and 1f.

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

## Perceptual Character

**5.18** The assessment unit has an open rural character, and its undeveloped nature contributes to tranquillity. However, the Penyquick Road, its proximity to the edge of Bath and views to Twerton exert a slight urban influence on its character, with localised effects on dark skies and tranquillity.

**5.19** Overall, the perceptual character is of moderate sensitivity to all potential development types assessed for this unit.

## Visual Character

### Views of the Assessment Unit

- The ZTV (in Appendix A) indicates that the extent of visibility is similar from potential development of up to 9m, 13m and 20m.
- There will be visibility of potential development within the assessment unit from:
  - The local footpath that crosses through it, the tracks on the open hillside within the assessment unit (below Seven Acre Wood) and the Pennyquick Road.
  - The north-eastern edge of Newton St Loe Conservation area.
  - The A4 (Road View LBR2) and GWR rail line to the north and north-west.
  - Footpaths crossing the valley floor to the north, particularly the Bristol to Bath Railway Path and Avon Trail.
  - Footpaths crossing through Newton Park to the south-west.
  - Roads and footpaths on the valley slopes to the north, including the Cotswold Way National Trail (particularly from elevated viewpoints at Penn Hill, Dean Hill and Kelston Round Hill) and Kelston Road A431 (Road View K1).
  - The designed parkland at Kelston Park (Grade II\* Registered Park and Garden), which takes advantage of its location on the edge of the Cotswold Escarpment to exploit views out across the Avon valley.
  - Public open spaces at elevated locations within Bath where there are distant westward and north-westwards views over the valley landscape of the assessment units. This includes locations such as Beckford's

Tower and Lansdown Cemetery, Alexandra Park (looking west), Sham Castle and Primrose Hill (Viewpoints 2, 12d, 15 and 20).

## Views from the Assessment Unit

- The landscape of the assessment unit has an open visual character with important visual relationships with surrounding areas, including the Cotswolds National Landscape.
- Potential development on the assessment units may obscure views of:
  - The Cotswold Escarpment, which forms a prominent green backdrop rising from the River Avon to the north.
  - The house at Kelston Park, which provides a local landmark.

**5.20** Overall, the visual character is of high sensitivity to potential development.

## Setting of the Cotswolds National Landscape

**5.21** The landscape of the assessment unit has an important visual relationship with the Cotswolds National Park.

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



## Summary of Landscape Sensitivity

**Table 5.1: Sensitivity scores**

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

**5.23** The arable landscape of the assessment unit is limited in natural and historic features, and its rural character is slightly influenced locally by Pennyquick Road along the southern boundary and views to Twerton, which reduces sensitivity to development.

**5.24** However, the elevated plateau of the assessment unit and the rural prospect it contributes to from the Cotswold Escarpment (within the nationally protected Cotswolds National Landscape), as well as the green edge it provides to Bath and its detachment from the city, increase its sensitivity. The open character of the landscape and resulting intervisibility with the escarpment to the north from within the Cotswolds National Landscape, from viewpoints along the Cotswold Way to the north and north-east, from along the Bristol to Bath Railway Path and the River Avon Trail, from part of Newton St Loe Conservation Area and from westward and north-westward facing views within the city, also increase sensitivity to development. The assessment unit also forms a large proportion of the gap between Bath and Newton St Loe.

## Variations in Landscape Sensitivity

**5.25** Not applicable.

## Landscape Sensitivity to Potential Residential Development

**Table 5.2: Overall sensitivity of the assessment unit to residential development**

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

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

## Summary

**5.26** The assessment unit is judged to have a high sensitivity to small scale (<1ha), medium scale (1-5ha), medium-large scale (5-10ha) and large scale (<10ha) residential development, as development of any size would be incongruous within the open rural landscape and detached from the edge of the city. The prominent landform of the assessment unit would result in development being widely visible, particularly from views within Bath that look westwards and views southwards from the Cotswolds National Landscape. Development in this assessment unit, would also negate the role of the area as a rural approach and green edge to Bath.

## Landscape Sensitivity to Potential Purpose-Built Student Accommodation (PBSA) Development

**Table 5.3: Overall sensitivity of the assessment unit to purpose-built student accommodation (PBSA) development**

Typology	Sensitivity
Purpose Built Student Accommodation (PBSA) – 4 storey, minimal car parking (20m), well treed or parkland setting	High

## Summary

**5.27** The assessment unit is judged to have a high sensitivity to PBSA, as development of this height will be highly visible in any part of the assessment unit. Development in this assessment unit, would also negate the role of the area as a rural approach and green edge to Bath.

## Landscape Sensitivity to Potential Business Park Development

**Table 5.4: Overall sensitivity of the assessment unit to Business Park development**

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

## Summary

**5.28** The assessment unit is judged to have a high sensitivity to small scale (<1ha), medium scale (1-5ha), medium-large scale (5-10ha) and large scale

(<10ha) business park development, as development of any size would be incongruous within the open rural landscape and detached from the edge of the city. The prominent landform of the assessment unit would result in development being widely visible, particularly from views within Bath that look westwards and views southwards from the Cotswolds National Landscape. Development in this assessment unit, would also negate the role of the area as a rural approach and green edge to Bath.

## WHS Heritage Impact Assessment

### Commentary Against Attributes and Receptors

**5.29** This section considers the contribution of the assessment unit (see Figure 5.1: Assessment Unit 1e, 1f) to the attributes of OUV. Where the baseline assessment has identified that the assessment unit does not contain any receptors that convey an attribute, that attribute has not been discussed.

### Roman Archaeology

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

- 3. Roman and Iron Age archaeological remains beyond the city wall including hill forts, field systems, villas and funerary monuments, demonstrating the context of the Roman city.

**5.31** Receptors for this attribute include:

- Roman burials, E of Home Farm, Newton St. Loe, Roman, (land parcel 1e only).
- Prehistoric Settlement, Quarry Field, Newton St. Loe, Iron Age; Late bronze age; Later Iron Age; Roman, Corn drying kiln; Ditch; Enclosed field system; Occupation site; Post-built structure; Round house (domestic).
- Medieval fields and supposed Prehistoric fields, Newton Brook Valley, Newton St. Loe, Medieval, Field system (land parcel 1f only).

**5.32** The assessment unit contains three receptors that convey the attribute and contribute to OUV. The receptors lie within the assessment unit and are not visible on current aerial imagery or LiDAR. They lie within agricultural land and so potentially, given the location, are overlain by fluvial deposits. Their presence was identified by geophysical survey. The HER entry suggests the features may

be evidence of a settlement and may also relate to burials/funerary activity or livestock management. The level of preservation is unknown but quarrying within the assessment unit in the 18<sup>th</sup> century has resulted in some ground disturbance in the area. The receptors make some contribution to the attribute as part of the archaeological record of prehistoric and Roman activity around Bath but, given the disturbance, this is limited.

**5.33** Roman remains are specifically noted in the statement of OUV, and the asset type has been identified in the WHS management plan or setting SPD as a contributor to OUV. Although Iron Age remains are mentioned in sub-attribute 3 they are not noted in the statement of OUV and the asset itself has not been specifically identified in the WHS management plan or setting SPD as a contributor to OUV.

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

## Georgian Town Planning

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

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

**5.36** Receptors for this attribute include:

- The character and appearance of the assessment unit itself as undeveloped green countryside on the edge of the city.
- Viewpoints (map 7 Setting SPD)
  - 3 Lansdown Crescent
  - 4 Approach Golf Course
  - 9 Old Newbridge Hill
  - 12d Alexandra Park looking west
  - 14 Bloomfield Road
  - 15 Sham Castle
  - 16 Widcome Hill
  - 20 Primrose Hill
  - 21 Ralph Allen's Drive/Meare Road
- Historic Views (map 9 Setting SPD)
  - 1d Beechen Cliff – from the western end
  - 8 Landown
  - 4a The Avon Valley (west)
  - 17 Sham Castle and the Fir Forest
  - 19a Widcome Hill
  - 23 The Southern Skyline
- Road Viewpoints (map 14 Setting SPD)
  - LBR2 Saltford to Bath (A4)
  - K1 and K3 Upper Bristol Road/Bitton
  - W3 and W5 Brassknocker Road, Claverton Down Road and Widcombe Hill
- Historic sites and features



- Kelston Park – grade II\* listed building, RPG and conservation area
- Newton Park – grade I listed building and grade II\* RPG
- Pennyquick/Whiteway Road (Frome Road)

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

**5.38** In most of these views the assessment unit is not a critical factor – it has not been manipulated to form a component of the composition and is not the focal point of it either. Its role is incidental as part of the backdrop to the subject of the view or, for those views intended to be more generalised, as part of the panorama. However, the unit has been identified as part of the green hillsides forming prominent features of the landscape setting of the WHS (map 5 of the SPD). As such, the area contributes to this attribute more strongly than other less visually prominent parts of the setting.

**5.39** The assessment unit plays a more significant role in views on the western edge of the city, particularly parcel 1I. This includes views along historic rides/walks on the northern side of the valley, and along the historic western route into and out of the city – such as viewpoint 9 Old Newbridge Hill, historic view 4a the Avon Valley (west), LBR1 and LBR2 Saltford to Bath (A4), and K1 Upper Bristol Road/Bitton. Pennyquick/Whiteway Road to the south of the assessment unit, follows the line of the medieval Frome Road, later a turnpike road. It links the western and southern entrances to the city at New Bridge and Odd Down and provides extensive views across the landscape setting of the city and towards the city edges.

**5.40** From the west, as the countryside starts to give way to the built form of the city, the views from LBR2 and K1 create a strong sense of approaching the city boundary and entering the urban core. Conversely, as you descend the hill at

viewpoint 9 and historic view 4a, views start to open up toward the surrounding countryside, creating a strong sense of transition into its rural hinterland.

Although these fixed viewpoints have particular value, it is more important as part of the kinetic view that would have been experienced on this approach to the city. The assessment unit appears in these views in a form much as it has for centuries, adding to the authenticity of the attribute.

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

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

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

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

- 42. The compact and sustainable form of the city contained within a hollow of the hills.
- 43. The distinct pattern of settlements, Georgian houses and villas in the setting of the site, reflecting the layout and function of the Georgian city.
- 44. Green, undeveloped hillsides within and surrounding the city.

- 46. Open agricultural landscape around the city edges, in particular grazing and land uses which reflect those carried out in the Georgian period.

**5.44** Receptors for this attribute include:

- The character and appearance of the assessment unit itself as undeveloped green countryside on the edge of the city.
- Viewpoints (map 7 Setting SPD)
  - 3 Lansdown Crescent
  - 4 Approach Golf Course
  - 9 Old Newbridge Hill
  - 12d Alexandra Park looking west
  - 15 Sham Castle
  - 16 Widcome Hill
  - 20 Primrose Hill
  - 21 Ralph Allen's Drive/Meare Road
- Historic Views (map 9 Setting SPD)
  - 4a The Avon Valley (west)
  - 8 Lansdown
  - 17 Sham Castle and the Fir Forest
  - 19a Widcome Hill
  - 23 The Southern Skyline
- Road Viewpoints (map 14 Setting SPD)
  - LBR2 Salford to Bath (A4)
  - K1 and K3 Upper Bristol Road/Bitton

- W3 and W5 Brassknocker Road, Claverton Down Road and Widcombe Hill
- Historic sites and features
  - Kelston Park – grade II\* listed building, RPG and conservation area
  - Newton Park – grade I listed building and grade II\* RPG
  - Newton St Loe – conservation area
  - Corston – conservation area
  - The Globe Inn – grade II
  - Manor Farmhouse – grade II\*
  - Claysend Farmhouse – grade II

**5.45** The OUV conveyed by this attribute derives from the spatial, visual and functional relationship Bath has with the surrounding landscape. It is entirely dependent on the physical properties of that landscape as undeveloped, green countryside, and the topography that affects how prominent it is in views. This is most evident in views from within the property boundary that take in both the city and the landscape, as they best illustrate the symbiotic relationship between built and natural form. However, views within the setting either towards the city or contained within the setting have their role to play too in reinforcing the immediacy and intimacy of countryside and city. This stems from the appearance, use (agricultural and leisure) and perception of the landscape as the rural hinterlands of the city.

**5.46** The open agricultural landscape around the city edges is felt especially keenly in views from the historic approaches to the city along Kelston Road and the A36, and along Pennyquick/Whiteway Road to the south of the assessment unit. Here, and especially from Kelston Road and Pennyquick Road, the city limits are clearly legible. Views down the valley illustrate the containment of the city within the hollow in the hills, whilst views across the valley take in the rural landscape that surrounds it. These views strongly illustrate the distinct yet complementary characters of urban city and rural countryside. Such views are particularly important in conveying the compact nature of the city contained

within the Cotswold hills by its hollowed-out valley landscape and the agricultural land uses that have for centuries helped define and distinguish the countryside setting of the city from the dense urban core. The assessment unit's rural character and location at a critical point of transition into the urban fringes of the city has a strong influence on perceptions and first impressions on this approach to the city.

**5.47** The assessment unit also makes a strong contribution in views from roads, rides and paths on the western edge and northern side of the river valley. Here, the city limits are legible and the distinct yet complementary characters of urban city and rural countryside strongly experienced. Such views are particularly important in conveying the compact nature of the city contained within its valley landscape and the agricultural land uses that have for centuries helped define and distinguish the countryside setting of the city from the dense urban core. The assessment unit's rural character and location at a critical point of transition into the urban fringes of the city has a strong influence on perceptions and first impressions on this approach to the city.

**5.48** The degree of separation it provides between city and associated but outlying buildings and estates also contributes to our understanding of the layout and function of the Georgian city. The area sits between the city boundary and separate, isolated farmsteads, inns, estates and settlements such as Claysend Farmhouse (grade II), Manor Farmhouse (grade II\*), The Globe Inn (grade II), Kelston Park (grade II\* listed building and RPG), Newton Park (grade I listed building and grade II\* RPG), Newton St Loe and Corston (both conservation areas containing multiple listed buildings). The legibility of receptors such as this within an agricultural setting helps to convey the distinct historic pattern and character of rural development within the landscape. The low-density, more organic and open form of settlement within the setting of the city contrasts with the formal, high-density form of city development within the hollow.

**5.49** The ability to appreciate these features as separate but related entities is emphasised by the rural character of the intervening landscape – that is, it is not space that has been consciously integrated into the fabric of the city but is rural in character. This helps us understand the value of the property as a historic

landscape rather than a group of disparate assets. Those that date from the 18<sup>th</sup> and 19<sup>th</sup> centuries – a critical point of development for the city as we see it today – are even more significant, as they help us experience and understand it in a similar way to the Georgian resident/visitor. This illustrative contribution is not as dependent on views. The spatial relationship, the density, ratio and distribution of asset types all add to the authenticity of the landscape and how well it conveys its past uses and connections with the city.

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

## Overall Contribution of Assessment Unit to OUV

**Table 5.5: Summary of the contribution of assessment units to attributes/OUV**

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

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

## Variations in Contributions to OUV

**5.52** Both parcels within the assessment unit contribute equally due to both containing archaeology within their boundaries and both being included on SPD Map 5 (green hillsides forming prominent features of the landscape setting of the WHS).

## Attribute Sensitivity to Change and Potential impact

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

## Roman Archaeology Sensitivity to Change

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

## Georgian Town Planning Sensitivity to Change

**5.55** In relation to this assessment unit, the attribute is sensitive to change that will affect its character and appearance and how it appears in views that convey this attribute. Development that changes the character of the unit from undeveloped countryside to urban development will fundamentally alter its

character and the contribution it makes to the beauty of the city as part of the green backdrop in views of the historic cityscape.

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

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

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

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

**5.59** Development that blurs the boundary between countryside and city and changes the spatial and visual containment of the city within the hollow in the



hills will affect the important visual and spatial degree of separation between outlying historic features and settlements and the city.

## Potential Impact of Residential Development

**Table 5.6: Potential impact of residential development**

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

**5.60** Overall, there is the potential for a major adverse impact from all sizes of residential development on the ability of the assessment unit to convey the attributes. All land parcels within the assessment unit have been identified as highly sensitive to the type of development proposed.

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

## Potential Impact of Purpose-built Student Accommodation (PBSA) Development

Table 5.7: Potential impact of purpose-built student accommodation (PBSA) development

Typology	1e	1f	Overall Potential Impact on Assessment Unit
Purpose Built Student Accommodation (PBSA) – 4 storey, minimal car parking (20m), well treed or parkland setting	Major adverse	Major adverse	Major adverse

**5.62** There is the potential for a major adverse impact on the ability of the assessment unit to convey the attributes resulting from the development of PBSA. This development type could have a physical impact on archaeological remains and would be highly visible from key views within and toward the WHS. It would fundamentally change the character and appearance of the unit from undeveloped countryside to urban development. The height and large floorplate is not in-keeping with the established character of building types and settlements within the setting of the WHS, and even the creation of a well-treed and parkland setting around the building would change the open, agricultural character of the assessment unit and the way it appears in views. It would establish development beyond they historic city limits that would affect the historic approaches and points of entry/exit to the city. The extension of urban development into this area would affect the containment of the city within the hollow in the hills.

## Potential Impact from Business Park Development

**Table 5.8: Potential impact of business park development**

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

**5.63** Overall, there is the potential for a major adverse impact from all sizes of business park development on the ability of the assessment unit to convey the attributes. All land parcels within the assessment unit have been identified as highly sensitive to the type of development proposed.

**5.64** The form of the development – the outline heights of the two-storey pavilion buildings, the larger floorplates, the surface car parking and planting – is inconsistent with all attributes conveyed by the unit.

**5.65** It would fundamentally alter its character as the rural landscape setting to the city. It has the potential to impact on archaeological remains in both land parcels. It would be visible in key views across and toward the city, altering the green backdrop/foreground that conveys its rural location and contributes to its aesthetic values. It would establish development beyond their historic city limits that would affect the historic approaches and points of entry/exit to the city. It would extend the city beyond the hollow in the hills and affect its sense of containment. It would introduce a built form that is incongruous with historic settlement patterns and building types. Consequently, any development of this type would have an adverse impact.

## Potential Impact from Transport Interchange (Park & Ride) Development

Typology	1e	1f	Potential Impact
Medium scale Transport Interchange (Park & Ride) 700 car parking spaces	Major adverse	Major adverse	Major adverse
Large scale Transport Interchange (Park & Ride) 1500 car parking spaces	Major adverse	Major adverse	Major adverse



**5.66** Overall, there is the potential for a major adverse impact from both sizes of transport exchange on the ability of the assessment unit to convey the attributes. All land parcels within the assessment unit have been identified as highly sensitive to the type of development proposed.

**5.67** The form of the development is inconsistent with all attributes conveyed by the unit. It would fundamentally alter its character as the rural landscape setting to the city. It has the potential to impact on archaeological remains in both land parcels. The formalisation of the area into a transportation hub would change its character and appearance and affect views of and towards the city. It would introduce a built form that is incongruous with historic settlement patterns and building types. Consequently, any development of this type would have an adverse impact.

## Level of Effect on the WHS

**Table 5.9: Summary of the level of effect on the OUV of the WHS**

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

**Chapter 5** Assessment Unit 1e and 1f

Development Type	Overall Contribution of Assessment Unit to OUV	Overall Potential Impact on the Ability of the Assessment Unit to Convey Attributes	Level of Effect on the OUV of the WHS
Medium scale transport interchange (Park & Ride) (1-5ha)	High	Major adverse	High adverse
Large scale transport interchange (Park & Ride) (>10ha)	High	Major adverse	High adverse
Waste transfer/recycling centre (1.75-2ha)	N/A	N/A	N/A

## Level of Effect on the OUV of the WHS

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

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

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

**5.71** This is not to say that the assessment unit cannot take any development. Individual, bespoke buildings or small, more open grained collections of buildings would be more in-keeping with the settlement pattern and open, rural character of the landscape and so could potentially be more easily accommodated, depending on the site. But development of the type proposed that extends the city limits and draws its urban form and character out into its rural surroundings is always going to be contrary to the attributes of OUV.

## Planning Implications

### National Planning Policy Framework (NPPF)

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

**5.73** 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.

**5.74** 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’.

**5.75** 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.

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

## **UNESCO Guidance**

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

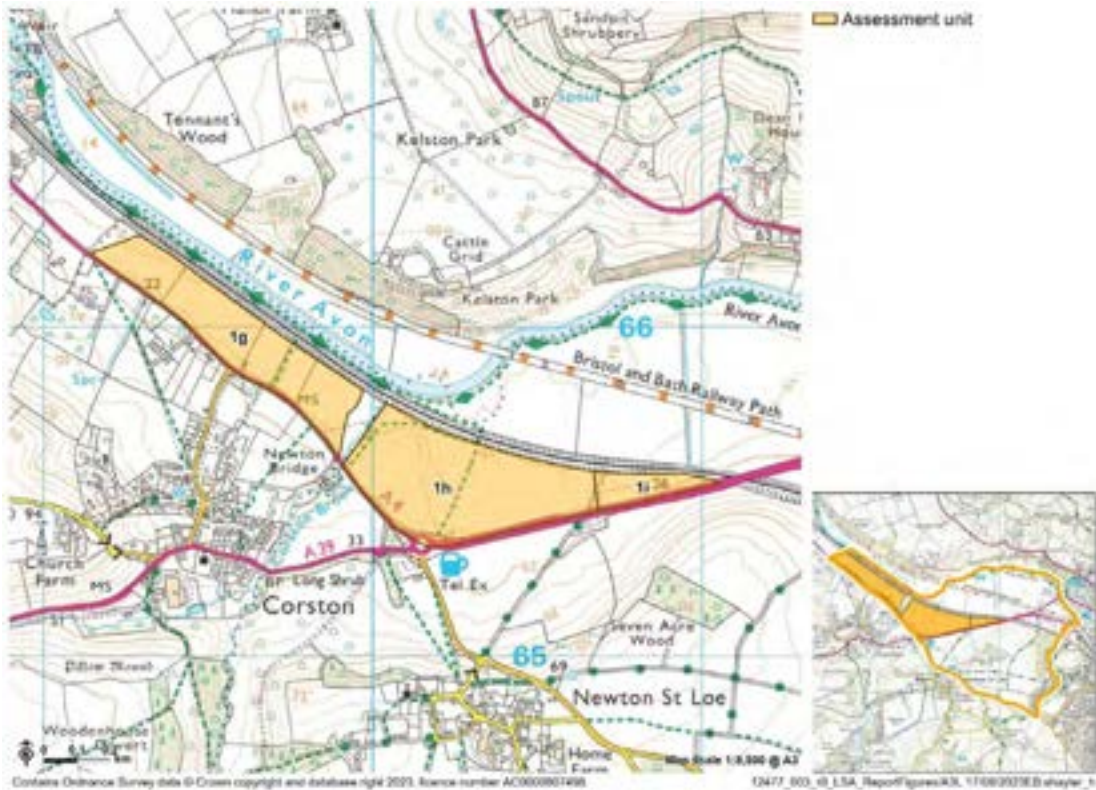
**5.78** For development to be considered acceptable, the level of negative effect would have to be reduced to negligible. The slightly lower medium-high adverse effects that might be experienced from development solely on less sensitive parts of the assessment unit is still unlikely to result in a significant enough reduction in negative impact to meet this, and so is likely to still be considered significant by UNESCO.

# Chapter 6

## Assessment Unit 1g, 1h and 1i

### Landscape Sensitivity Assessment

Figure 6.1: Location of Assessment Unit 1g, 1h and 1i



**Figure 6.2: View across parcel 1h from the top of the hill north to the north of Newton St Loe**



**Figure 6.3: Rugby pitches within parcel 1g**





## Commentary Against Landscape Sensitivity Indicators

### Landform

**6.1** The assessment unit forms part of the flat low-lying floodplain of the Avon with an absence of topographical variety.

**6.2** Overall, the landform is of low sensitivity to all potential development types assessed for this unit.

### Openness and Enclosure

**6.3** The landscape is generally open and unenclosed resulting in a strong sense of openness across the floodplain landscape of the assessment unit.

**6.4** There is a small degree of local enclosure provided by the embankment slopes of the main line railway along the northern boundary of the unit.

**6.5** Overall, the landscape under this criterion is of high sensitivity to potential development types assessed for this unit. However, this reduces to medium for small scale development types (residential, transport interchange and business park development) which could be sited to avoid the more rural and open areas of low-lying floodplain.

### 'Natural' Character

**6.6** Overall, the assessment unit is limited in semi-natural features. There is a small section of the Corston Brook and associated vegetation, which crosses through the assessment unit between parcels 1g and 1h.

**6.7** Priority habitat deciduous woodland exists along the edge of the River Avon (which itself is a SNCI) to the north-west.

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

## **Landscape Pattern and Time Depth**

**6.9** The assessment unit is influenced by transport corridors (including the A4 Bristol Road and the GWR mainline railway) which has fragmented the landscape and altered the landscape pattern.

**6.10** The small-scale medieval enclosure has been partly retained within parcel 1g, although is now under arable use and also contains rugby pitches.

**6.11** Parcel 1h comprises a large-scale arable field resulting from modern amalgamation.

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

## **Historic Features**

**6.13** There are relatively few visible historic features that contribute to landscape character, except for a milestone (Grade II) along the A4 Bristol Road (on the southern boundary of parcel 1g) and Stone Wharf Bridge (Grade II) – a stone railway bridge along the northern boundary of parcel 1g.

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

## Settlement Form and Edge

**6.15** Little built development is located within the assessment unit, except for buildings associated with the Stothert & Pitt RFC pitches within parcel 1g.

**6.16** The vegetated corridors of the River Avon and Newton Brook both provide strong boundary features along the edge of Bath. Mature vegetation filters the settlement edge, including Newbridge Park and Ride, the Bath marina and a mobile home site (Carrs Wood View), integrating it into the surrounding landscape.

**6.17** This assessment unit is separated from the edge of Bath by the other assessment units in Area 1. However, the open fields of the assessment unit provide a rural approach and backdrop to it, making a positive contribution to the character of the settlement edge.

**6.18** Small fields of pasture bound by wooded field boundaries, separate the assessment unit from the edge of Saltford to the north-west and the Corston Conservation Area to the south-west. The assessment unit forms a large proportion of the gap between Bath and Saltford.

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

## Recreational Value

**6.20** Three local footpaths cross north to south through parcels 1g and 1h and connect to the River Avon Trail which runs parallel with the northern boundary of the assessment unit on the opposite side of the railway line.

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

## Perceptual Character

**6.22** The assessment unit is largely undeveloped, although there is some human influence due to the rugby pitches and clubhouse in parcel 1g.

**6.23** The transport corridors (including the busy A4 Bristol Road and the GWR mainline railway) fragment the landscape and exert an urban influence on its character, with localised effects on dark skies and tranquillity.

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

## Visual Character

### Views of the Assessment Unit

- The ZTV (in Appendix A) indicates that the extent of visibility is similar from potential development of up to 9m, 13m and 20m.
- There will be visibility of potential development within the assessment unit from:
  - The footpaths within the assessment unit and the surrounding rail line, roads, and recreational routes crossing the valley floor to the north and south, particularly the River Avon Trail, the Bristol to Bath Railway Path, and from the A4 (Road View LBR2).
  - Roads and footpaths on the valley slopes to the north and north-east, including the Cotswold Way National Trail (particularly from elevated viewpoints to the north-east at Penn Hill, Dean Hill and Kelston Round Hill), Kelston Road A431 (Road View K1), as well as tracks on the open hillside to the south-east below Seven Acre Wood and local footpaths on the valley slopes around Corston to the south-west.

- The designed parkland at Kelston Park (Grade II\* Registered Park and Garden), which takes advantage of its location on the edge of the Cotswold Escarpment to exploit views out across the Avon valley.
- Public open spaces at elevated locations within Bath where there are distant westward views over the valley landscape of the assessment unit. This includes locations such as Beckford's Tower and Lansdown Cemetery, Old Newbridge Hill and Sham Castle Viewpoints 2, 9/K3 and 15).

## Views from the Assessment Unit

- The landscape of the assessment unit is partly open with important visual relationships with surrounding areas, including the Cotswolds National Landscape.
- Potential development on the assessment unit may obscure views of:
  - The Cotswold Escarpment, which forms a prominent green backdrop rising from the River Avon to the north.
  - The house at Kelston Park, which provides a local landmark.

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

## Setting of the Cotswolds National Landscape

**6.26** The landscape of the assessment unit has an important visual relationship with the Cotswolds National Park.

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

## Summary of Landscape Sensitivity

**Table 6.1: Sensitivity scores**

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

Development Types	Landform	Openness and Enclosure	'Natural' Character	Landscape Pattern and Time Depth	Historic Features	Settlement Form and Edge	Recreational Value	Perceptual Character	Visual Character	Setting of the CNL
interchange (Park & Ride) (<1ha)										
Medium scale transport interchange (Park & ride) (1-5ha)	Low	High	Low	Low	Low	High	Moderate	Low	High	High
Medium to large scale transport interchange (Park & Ride) (5-10ha)	Low	High	Low	Low	Low	High	Moderate	Low	High	High
Large scale transport interchange (Park & Ride) (>10ha)	High	High	Low	Low	Low	High	Moderate	Low	High	High

**6.28** The flat mostly arable landscape of the assessment unit is unremarkable in terms of landscape character (limited in natural and historic features) and its rural character is influenced locally by the busy transport corridors along the northern and southern boundaries and the rugby pitches in parcel 1g, which reduces sensitivity to development.

**6.29** However, the rural backdrop the landscape provides to the Bristol to Bath Railway Path, the River Avon Trail and rural prospect from the Cotswold Escarpment (within the nationally protected Cotswolds National Landscape), as well as the green edge it provides to Bath and its detachment from the city and surrounding villages of Salford and Corston, increase its sensitivity. The open character of the landscape and resulting intervisibility with the escarpment to the north from within the Cotswolds National Landscape, from viewpoints along the Cotswold Way to the north and north-east, and from westward facing views within the city, also increase sensitivity to development. The assessment unit also forms a large proportion of the gap between Bath and Salford.

## **Variations in Landscape Sensitivity**

**6.30** The sensitivity is partly reduced in parcel 1i due to the urban influence of transport infrastructure and within parcel 1g due to the human influence of the rugby pitches.



# Landscape Sensitivity to Potential Residential Development

**Table 6.2: Overall sensitivity of the assessment unit to residential development**

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

## Summary

**6.31** Overall, the assessment unit is judged to have a moderate sensitivity to small scale (<1ha) residential development which could physically be accommodated within parcel 1i or in parcel 1g where the existing rugby pitches are located. The urban influence of transport infrastructure and the human influence of the rugby pitches lowers sensitivity, particularly where it is filtered by the small woodland copse where the A4 Bristol Road crosses the railway embankment in parcel 1i and the treed route of the A4 Bristol Road.

**6.32** The assessment unit is judged to have a high sensitivity to medium scale (1-5ha), medium-large scale (5-10ha) and large scale (>10ha) residential development, as development of this size would encroach into the more open and rural area of the low-lying floodplain. Larger scale development in this

assessment unit, would also negate the role of the area as a rural approach and green edge to Bath.

## Landscape Sensitivity to Potential Purpose-Built Student Accommodation (PBSA) Development

**Table 6.3: Overall sensitivity of the assessment unit to purpose-built student accommodation (PBSA) development**

Typology	Sensitivity
Purpose Built Student Accommodation (PBSA) – 4 storey, minimal car parking (20m), well treed or parkland setting	High

### Summary

**6.33** The assessment unit is judged to have a high sensitivity to PBSA as development of this height will be highly visible in any part of the assessment unit. Development in this assessment unit, would also negate the role of the area as a rural approach and green edge to Bath.

## Landscape Sensitivity to Potential Business Park Development

**Table 6.4: Overall sensitivity of the assessment unit to Business Park development**

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

### Summary

**6.34** Overall, the assessment unit is judged to have a moderate sensitivity to small scale (<1ha) business park development which could physically be accommodated within parcel 1i or where the existing rugby pitches in parcel 1g are. The urban influence of transport infrastructure and the human influence of the rugby pitches lowers sensitivity, particularly where it is filtered by the small woodland copse where the A4 Bristol Road crosses the railway embankment in parcel 1i and the treed route of the A4 Bristol Road.

**6.35** The assessment unit is judged to have a high sensitivity to medium scale (1-5ha), medium-large scale (5-10ha) and large scale (>10ha) business park

development, as development of this size would encroach into the more open and rural area of the low-lying floodplain. Larger scale development in this assessment unit, would also negate the role of the area as a rural approach and green edge to Bath.

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

**Table 6.5: Overall sensitivity of the assessment unit to Transport Interchange (Park & Ride) development**

Typology	Sensitivity
Small scale Transport Interchange (Park & Ride) (<1ha) – 2 storey pavilion buildings (6m), low level surface car parking, well treed or parkland setting	Moderate
Medium scale Transport Interchange (Park & Ride) (1-5ha) – 2 storey pavilion buildings (6m), low level surface car parking, well treed or parkland setting	High
Medium to large scale Transport Interchange (Park & Ride) (5-10ha) – 2 storey pavilion buildings (6m), low level surface car parking, well treed or parkland setting	High
Large scale Transport Interchange (Park & Ride) (>10ha) – 2 storey pavilion buildings (6m), low level surface car parking, well treed or parkland setting	High

### Summary

**6.36** Overall, the assessment unit is judged to have a moderate sensitivity to small scale (<1ha) transport interchange development which could physically be accommodated within parcel 1i or in parcel 1g on the location of the existing rugby pitches. The urban influence of transport infrastructure and the human influence of the rugby pitches lowers sensitivity, particularly where it is filtered

by the small woodland copse where the A4 Bristol Road crosses the railway embankment in parcel 1i and the treed route of the A4 Bristol Road.

**6.37** The assessment unit is judged to have a high sensitivity to medium scale (1-5ha), medium-large scale (5-10ha) and large scale (>10ha) transport interchange development, as development of this size would encroach into the more open and rural area of the low-lying floodplain. Larger scale development in this assessment unit would also negate the role of the area as a rural approach and green edge to Bath.

## Mitigation and Enhancement Opportunities

### Landscape Character and Features

#### Potential Effects

- Development could have a high impact due to the open character of the valley landscape which offers little potential for landscape mitigation. Higher buildings would be particularly visible in the flat and open landscape of the valley floor.
- Loss of landscape features such as mature vegetation.
- Loss of agricultural fields and hedgerow field boundaries.
- Encroachment towards the historic Stone Wharf Bridge.
- Development could introduce new lighting resulting in night blight.
- Development could impact the rural quality of the local footpaths that run through the assessment unit.

#### Mitigation and Enhancement Opportunities

- Low potential for mitigation due to the open character of the valley.

- Retain, protect and enhance all mature vegetation, especially tree lines along transport corridors including the A4 Bristol Road and GWR railway.
- Improve the connectivity of woodlands and hedgerows through new tree planting and hedgerow corridors that are in character with the locality, using native species where possible/suitable.
- Loss of open arable fields is unavoidable as any potential development would remove land from agricultural use. However, field boundaries should be retained and enhanced where possible to avoid complete loss of field pattern.
- Protect the historic bridge and its surroundings by setting development back from it.
- Minimise the influence of lighting associated with new development and only install outdoor lighting where necessary.
- Follow the Institute of Lighting Professionals guidance and use dark sky-friendly lighting.
- Protect deciduous woodland lining the footpaths. Set development back from these valued recreational resources to preserve their rural character.

## **Effect on the Settlement Form and Edge of Bath**

### **Potential Effects**

- Development would not relate well to the existing settlement edge of Bath, as the assessment unit is located almost 1km from it.
- Development could adversely impact the rural surroundings to Bath.

### **Mitigation and Enhancement Opportunities**

- Retain the mature vegetation along the River Avon, and tree lines along the A4 Bristol Road and GWR railway.

## Visual Amenity

### Potential Effects

- Development could have a high impact on the expansive views to and from the assessment unit due to the open character of the landscape and the prominent slopes of the valley sides to the south-east and south-west, and Cotswold Escarpment to the north.
- Development may be seen by:
  - Pedestrians on the local footpaths that cross through the assessment unit.
  - Pedestrians/cyclists on the Bristol to Bath Railway Path.
  - Pedestrians/cyclists on the River Avon Trail.
  - Pedestrians on tracks on the north facing hill slope near Seven Acre Wood to the south-east and on footpaths around Corston to the south-west.
  - Pedestrians on the Cotswold Way National Trail (within the Cotswolds National Landscape), particularly at vantage points on Penn Hill, Dean Hill and Kelston Round Hill.
  - Motorists/cyclists using roads crossing the valley floor, particularly the A4 Bristol Road which is a key route into Bath (Road View LBR2).
  - Road users on Kelston Road A431 which runs alongside the park (Road View K1).
  - Passengers on the mainline railway between Bristol and London.
  - Visitors to Kelston Park on the Cotswold Escarpment (within the Cotswolds National Landscape).
  - Visitors and residents in Bath, at elevated locations within the city with westwards views to the surrounding countryside. Those noted in the City of Bath WHS Setting SPD include viewpoints from Old Newbridge Hill (Viewpoint 9/ K3) and more distant views from Beckford's Tower

and Lansdown Cemetery (Viewpoint 2) and Sham Castle (Viewpoint 15).

## Mitigation and Enhancement Opportunities

- Retain, protect and enhance all existing vegetation within and adjacent to any development site, including the mature vegetation along the River Avon, and tree lines along the A4 Bristol Road and GWR railway.
- Screen new development with additional planting, using local native species where possible/suitable, to maintain the rural character of the wider area and minimise impacts on receptors.
- Intersperse green open space and tree planting within development to help soften and break up the perceived mass of built forms, strengthen green infrastructure, and enhance the integration of built forms within the landscape.

## Views to and from the Cotswolds National Landscape

### Potential Effects

- Development could detract from the rural prospect the landscape provides to the Cotswolds National Landscape.
- Development could interrupt views to and from Kelston Park and the wooded slopes of the Cotswold Escarpment, which provide a green backdrop to the landscape of the assessment unit.
- Development could interrupt views to the house at Kelston Park, detracting from its value as a local landmark.



## Mitigation and Enhancement Opportunities

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

## WHS Heritage Impact Assessment

### Commentary Against Attributes and Receptors

**6.38** This section considers the contribution of the assessment unit (see Figure 6.1: Assessment Unit 1g, 1h and 1i above) to the attributes of OUV. Where the baseline assessment has identified that the assessment unit does not contain any receptors that convey an attribute, that attribute has not been discussed.

### Roman Archaeology

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

- 3. The surrounding road system and street plan of the Roman city, overlain by the medieval layout and influencing the form of the Georgian city, such as London Road.

**6.40** Receptors for this attribute include:

- Roman Road (parcels 1h and 1i).

**6.41** The assessment unit contains one receptor that conveys the attribute and contributes to OUV. The receptor lies partially within the unit assessment unit along its southern boundary. It is not visible on current aerial imagery or LiDAR. It is within agricultural land and although it is unlikely to have been ploughed given its continued use as a road, it has been obscured by agricultural attrition. The level of preservation is unknown. The receptor makes a contribution to the attribute as part of the archaeological record of Roman activity around Roman roads are mentioned in sub-attribute 4, and they are noted in the statement of OUV. The asset itself has not been specifically identified in the WHS management plan setting SPD as a contributor to OUV.

**6.42** The overall contribution of the assessment unit to the headline attribute is low.

## Georgian Town Planning

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

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

**6.44** Receptors for this attribute include:

- The character and appearance of the assessment unit itself as undeveloped green countryside on the edge of the city.
- Viewpoints (map 7 Setting SPD)
  - 3 Lansdown Crescent
  - 4 Approach Golf Course
  - 9 Old Newbridge Hill
  - 12d Alexandra Park looking west
  - 15 Sham Castle
  - 16 Widcome Hill
  - 20 Primrose Hill

- 21 Ralph Allen's Drive/Meare Road
- Historic Views (map 9 Setting SPD)
  - 1d Beechen Cliff – from the western end
  - 8 Lansdown
  - 4a The Avon Valley (west)
  - 17 Sham Castle and the Fir Forest
  - 19a Widcome Hill
  - 23 The Southern Skyline
- Road Viewpoints (map 14 Setting SPD)
  - LBR1 and LBR2 Salford to Bath (A4)
  - K1 and K2 Upper Bristol Road/Bitton
  - W3 and W5 Brassknocker Road, Claverton Down Road and Widcombe Hill
- Historic sites and features
  - Kelston Park – grade II\* listed building, RPG and conservation area
  - Newton Park – grade I listed building and grade II\* RPG
  - Stone Wharf Bridge – grade II

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

**6.46** In most of these views the area is not a critical factor – it has not been manipulated to form a component of the composition and is not the focal point of it either. Instead, its contribution in relation to this attribute is more incidental, as part of the rural landscape backdrop to the subject of the view or, for those

views intended to be more generalised, as part of the panorama. However, it has not been identified as part of the green hillsides forming prominent features of the landscape setting of the WHS (map 5 of the SPD). As such, it conveys the attribute less strongly than other parts of the setting that appear more prominently in views from and in conjunction with the city.

**6.47** From the west, as the countryside starts to give way to the built form of the city, the views from LBR2 and K1 create a strong sense of approaching the city boundary and entering the urban core. Conversely, as you descend the hill at viewpoint 9 and historic view 4a, views start to open up toward the surrounding countryside, creating a strong sense of transition into its rural hinterland. Although these fixed viewpoints have particular value, it is more important as part of the kinetic view that would have been experienced on this approach to the city. The assessment unit appears in these views in a form much as it has for centuries, adding to the authenticity of the attribute.

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

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

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

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

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

**6.51** Receptors for this attribute include:

- The character and appearance of the assessment unit itself as undeveloped green countryside on the edge of the city.
- Viewpoints (map 7 Setting SPD)
  - 3 Lansdown Crescent
  - 4 Approach Golf Course
  - 9 Old Newbridge Hill
  - 12d Alexandra Park looking west
  - 15 Sham Castle
  - 16 Widcome Hill
  - 20 Primrose Hill
  - 21 Ralph Allen's Drive/Meare Road
- Historic Views (map 9 Setting SPD)
  - 4a The Avon Valley (west)

- 8 Lansdown
- 17 Sham Castle and the Fir Forest
- 19a Widcome Hill
- 23 The Southern Skyline
- Road Viewpoints (map 14 Setting SPD)
  - LBR1 and LBR2 Salford to Bath (A4)
  - K1, K2 and K3 Upper Bristol Road/Bitton
  - W3 and W5 Brassknocker Road, Claverton Down Road and Widcombe Hill
- Historic sites and features
  - Kelston Park – grade II\* listed building, RPG and conservation area
  - Newton Park – grade I listed building and grade II\* RPG
  - Newton St Loe – conservation area
  - Corston – conservation area
  - The Globe Inn – grade II
  - Manor Farmhouse – grade II\*

**6.52** The OUV conveyed by this attribute derives from the spatial, visual and functional relationship Bath has with the surrounding landscape. It is entirely dependent on the physical properties of that landscape as undeveloped, green countryside, and the topography that affects how prominent it is in views. This is most evident in views from within the property boundary that take in both the city and the landscape, as they best illustrate the symbiotic relationship between built and natural form. However, views within the setting either towards the city or contained within the setting have their role to play too in reinforcing the immediacy and intimacy of countryside and city. This stems from the appearance, use (agricultural and leisure) and perception of the landscape as the rural hinterlands of the city.

**6.53** The open agricultural landscape around the city edges is felt especially keenly in views from the historic approaches to the city along Kelston Road and the A36. Here, and especially from Kelston Road, the city limits are clearly legible. Views down the valley illustrate the containment of the city within the hollow in the hills, whilst views across the valley take in the rural landscape that surrounds it. These views strongly illustrate the distinct yet complementary characters of urban city and rural countryside. Such views are particularly important in conveying the compact nature of the city contained within the Cotswold hills by its hollowed-out valley landscape and the agricultural land uses that have for centuries helped define and distinguish the countryside setting of the city from the dense urban core. The assessment unit's rural character and location at a critical point of transition into the urban fringes of the city has a strong influence on perceptions and first impressions on this approach to the city.

**6.54** The degree of separation it provides between city and associated but outlying buildings and estates also contributes to our understanding of the layout and function of the Georgian city. The area sits between the city boundary and separate, isolated farmsteads, inns, estates and settlements such as Manor Farmhouse (grade II\*), The Globe Inn (grade II), Kelston Park (grade II\* listed building and RPG), Newton Park (grade I listed building and grade II\* RPG), Newton St Loe and Corston (both conservation areas containing multiple listed buildings). The legibility of receptors such as this within an agricultural setting helps to convey the distinct historic pattern and character of rural development within the landscape. The low-density, more organic and open form of settlement within the setting of the city contrasts with the formal, high-density form of city development within the hollow.

**6.55** The ability to appreciate these features as separate but related entities is emphasised by the rural character of the intervening landscape – that is, it is not space that has been consciously integrated into the fabric of the city but is rural in character. This helps us understand the value of the property as a historic landscape rather than a group of disparate assets. Those that date from the 18th and 19th centuries – a critical point of development for the city as we see it today – are even more significant, as they help us experience and understand it in a similar way to the Georgian resident/visitor. This illustrative contribution is



not as dependent on views. The spatial relationship, the density, ratio and distribution of asset types all add to the authenticity of the landscape and how well it conveys its past uses and connections with the city.

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

## Overall Contribution of Assessment Unit to OUV

**Table 6.6: Summary of the contribution of assessment units to attributes/OUV**

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

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

## Variations in Contributions to OUV

**6.58** The contribution of parcels 1h and 1i are higher due to the existence of Roman archaeology within their boundaries. However, all the parcels make a

high contribute overall due to their open, undeveloped nature and continuation of historic land use within.

## Attribute Sensitivity to Change and Potential impact

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

### Roman Archaeology Sensitivity to Change

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

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

## Georgian Town Planning Sensitivity to Change

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

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

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

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

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

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

## Potential Impact of Residential Development

Table 6.7: Potential impact of residential development

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

**6.67** Overall, there is the potential for a major adverse impact from all sizes of residential development on the ability of the assessment unit to convey the attributes. All land parcels within the assessment unit have been identified as highly sensitive to the type of development proposed.

**6.68** There are individual land parcels where some development types would not affect all attributes to the same extent. For example, 1g does not contain any archaeological remains. However, the form of the development – the outline heights and densities – is inconsistent with the attributes of Georgian town planning and 'the green setting of the city in the hollow in the hills' conveyed by the unit, and so the overall impact would still be major adverse.

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

## Potential Impact of Purpose-built Student Accommodation (PBSA) Development

Table 6.8: Potential impact of purpose-built student accommodation (PBSA) development

Typology	1a	1b	1c	Overall Potential Impact on Assessment Unit
Purpose Built Student Accommodation (PBSA) – 4 storey, minimal car parking (20m), well treed or parkland setting	Major adverse	Major adverse	Major adverse	Major adverse

**6.70** There is the potential for a major adverse impact on the ability of the assessment unit to convey the attributes resulting from the development of PBSA. This development type could have a physical impact on archaeological remains and would be highly visible from key views within and toward the WHS. It would fundamentally change the character and appearance of the unit from undeveloped countryside to urban development. The height and large floorplate is not in-keeping with the established character of building types and settlements within the setting of the WHS, and even the creation of a well-treed and parkland setting around the building would change the open, agricultural character of the assessment unit and the way it appears in views. It would establish development beyond the historic city limits that would affect the historic approaches and points of entry/exit to the city. The extension of urban development into this area would affect the containment of the city within the hollow in the hills.



## Potential Impact from Business Park Development

Table 6.9: Potential impact from business park development

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

**6.71** Overall, there is the potential for a major adverse impact from all sizes of business park development on the ability of the assessment unit to convey the attributes. All land parcels within the assessment unit have been identified as highly sensitive to the type of development proposed.

**6.72** There are individual land parcels where some development types would not affect all attributes to the same extent. For example, parcel 1g does not contain any archaeological remains. However, the form of the development – the outline heights of the two-storey pavilion buildings, the larger floorplates, the surface car parking and planting – is inconsistent with the attributes of Georgian town planning and ‘the green setting of the city in the hollow in the hills’ conveyed by the unit, and so the overall impact would still be major adverse.

**6.73** It would fundamentally alter its character as the rural landscape setting to the city. This type of development would be visible in key views across and toward the city, altering the green backdrop/foreground that conveys its rural location and contributes to its aesthetic values. It would establish development beyond their historic city limits that would affect the historic approaches and points of entry/exit to the city. It would extend the city beyond the hollow in the hills and affect its sense of containment. It would introduce a built form that is incongruous with historic settlement patterns and building types. Consequently, any development of this type would have an adverse impact, but with some locations resulting in a higher level than others.

## Potential Impact from Transport Interchange (Park & Ride) Development

Typology	1g	1h	1i	Potential Impact
Medium scale Transport Interchange (Park & Ride) 700 car parking spaces	Major adverse	Major adverse	Major adverse	Major adverse
Large scale Transport Interchange (Park & Ride) 1500 car parking spaces	Major adverse	Major adverse	Major adverse	Major adverse

**6.74** Overall, there is the potential for a major adverse impact from both sizes of transport exchange on the ability of the assessment unit to convey the attributes.

**6.75** There are individual land parcels where the development type would not affect all attributes to the same extent. For example, parcel 1g does not contain any archaeological remains. However, the form of the development is inconsistent with the attributes of Georgian town planning and 'the green setting of the city in the hollow in the hills' conveyed by the unit, and so the overall impact would still be major adverse.

**6.76** Whilst development in 1g may avoid physical contact with archaeological remains, the formalisation of the area into a transportation hub would change its character and appearance and affect views of and towards the city. It would introduce a built form that is incongruous with historic settlement patterns and building types. Consequently, any development of this type would have an adverse impact.

## Level of Effect on the WHS

**Table 6.10: Summary of the level of effect on the OUV of the WHS**

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

Development Type	Overall Contribution of Assessment Unit to OUV	Overall Potential Impact on the Ability of the Assessment Unit to Convey Attributes	Level of Effect on the OUV of the WHS
Medium scale transport interchange (Park & Ride) (1-5ha)	High	Major adverse	High adverse
Large scale transport interchange (Park & Ride) (>10ha)	High	Major adverse	High adverse
Waste transfer/recycling centre (1.75-2ha)	N/A	N/A	N/A

## Level of Effect on the OUV of the WHS

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

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

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

**6.80** This is not to say that the assessment unit cannot take any development. Individual, bespoke buildings or small, more open grained collections of buildings would be more in-keeping with the settlement pattern and open, rural character of the landscape and so could potentially be more easily accommodated, depending on the site. But development of the type proposed that extends the city limits and draws its urban form and character out into its rural surroundings is always going to be contrary to the attributes of OUV.

## Planning Implications

### National Planning Policy Framework (NPPF)

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

**6.82** 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.

**6.83** 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’.

**6.84** 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.

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

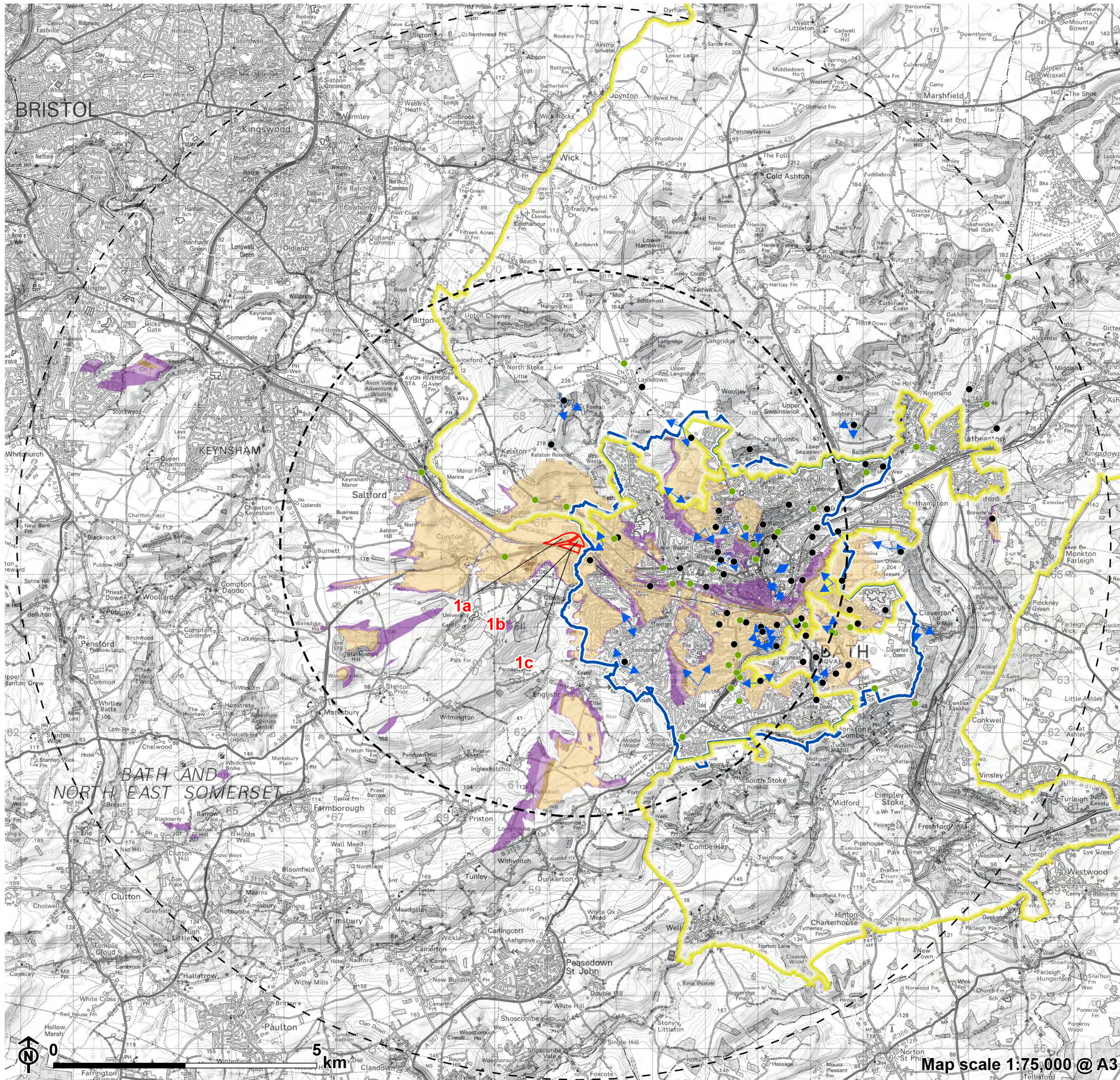
### UNESCO Guidance

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

**6.87** For development to be considered acceptable, the level of negative effect would have to be reduced to negligible. The slightly lower medium-high adverse effects that might be experienced from development solely on less sensitive parts of the assessment unit is still unlikely to result in a significant enough reduction in negative impact to meet this, and so is likely to still be considered significant by UNESCO.

## Appendix A

### Viewpoint Location and ZTV Plans



**ZTV for Assessment Unit 1a, b & c**

- Assessment unit boundary
- 5km from assessment unit boundary
- 10km from assessment unit boundary
- Cotswolds National Landscape
- City of Bath World Heritage Site
- Potential development at 6m
- Potential development at 9m
- Potential development at 13m
- Potential development at 20m
- ↔ WHS SPD Viewpoints
- WHS SPD Road Viewpoints
- WHS SPD Historic Viewpoints

**Notes**

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

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

Earth curvature and atmospheric refraction have been taken into account.

The ZTV was calculated using ArcMap 10.8.1 software

ZTV for Assessment Unit 1d, j, k, l, & m

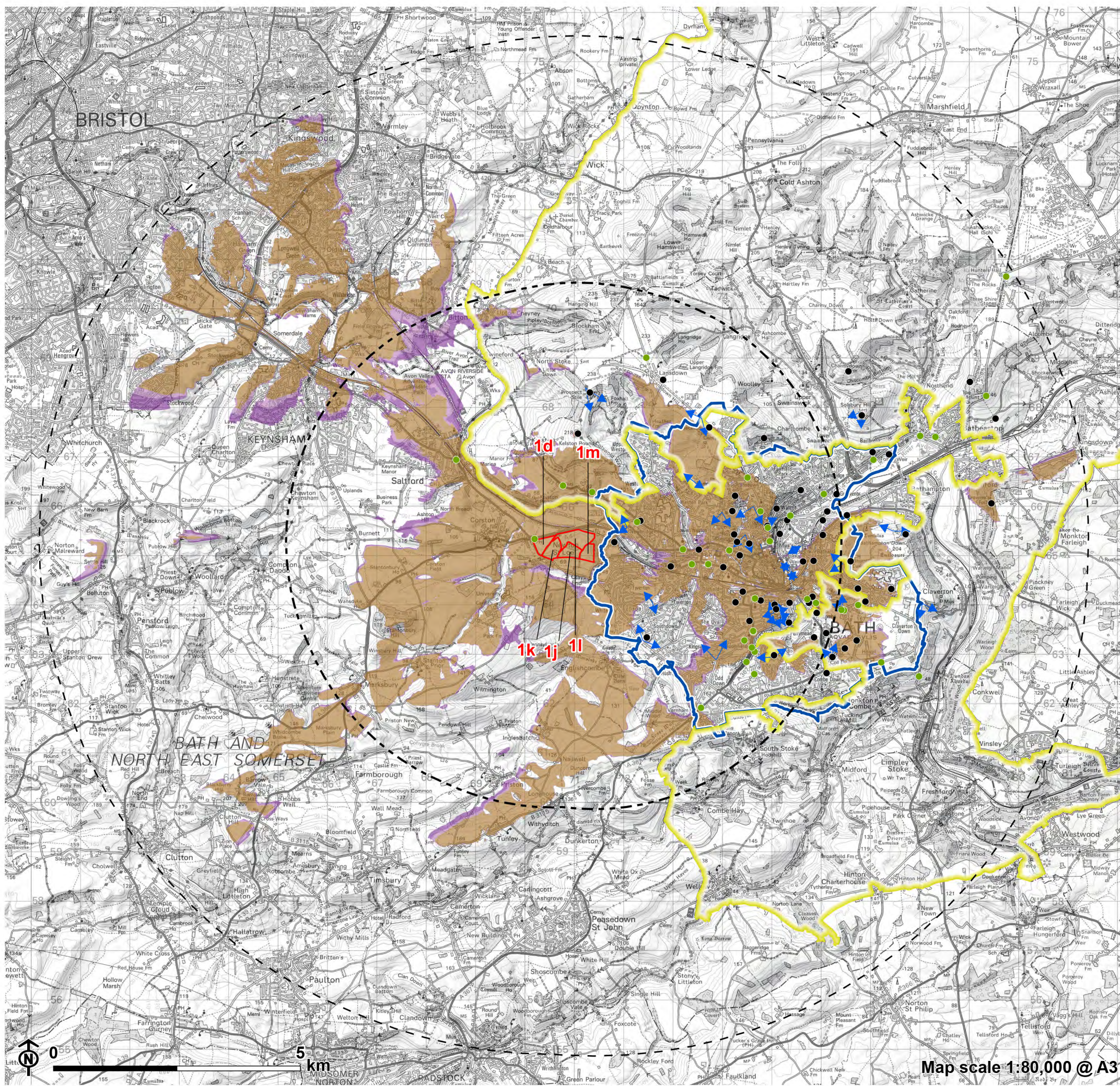
- Assessment unit boundary
- 5km from assessment unit boundary
- 10km from assessment unit boundary
- Cotswolds National Landscape
- City of Bath World Heritage Site
- Potential development at 9m
- Potential development at 13m
- Potential development at 20m
- WHS SPD Viewpoints
- WHS SPD Road Viewpoints
- WHS SPD Historic Viewpoints

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

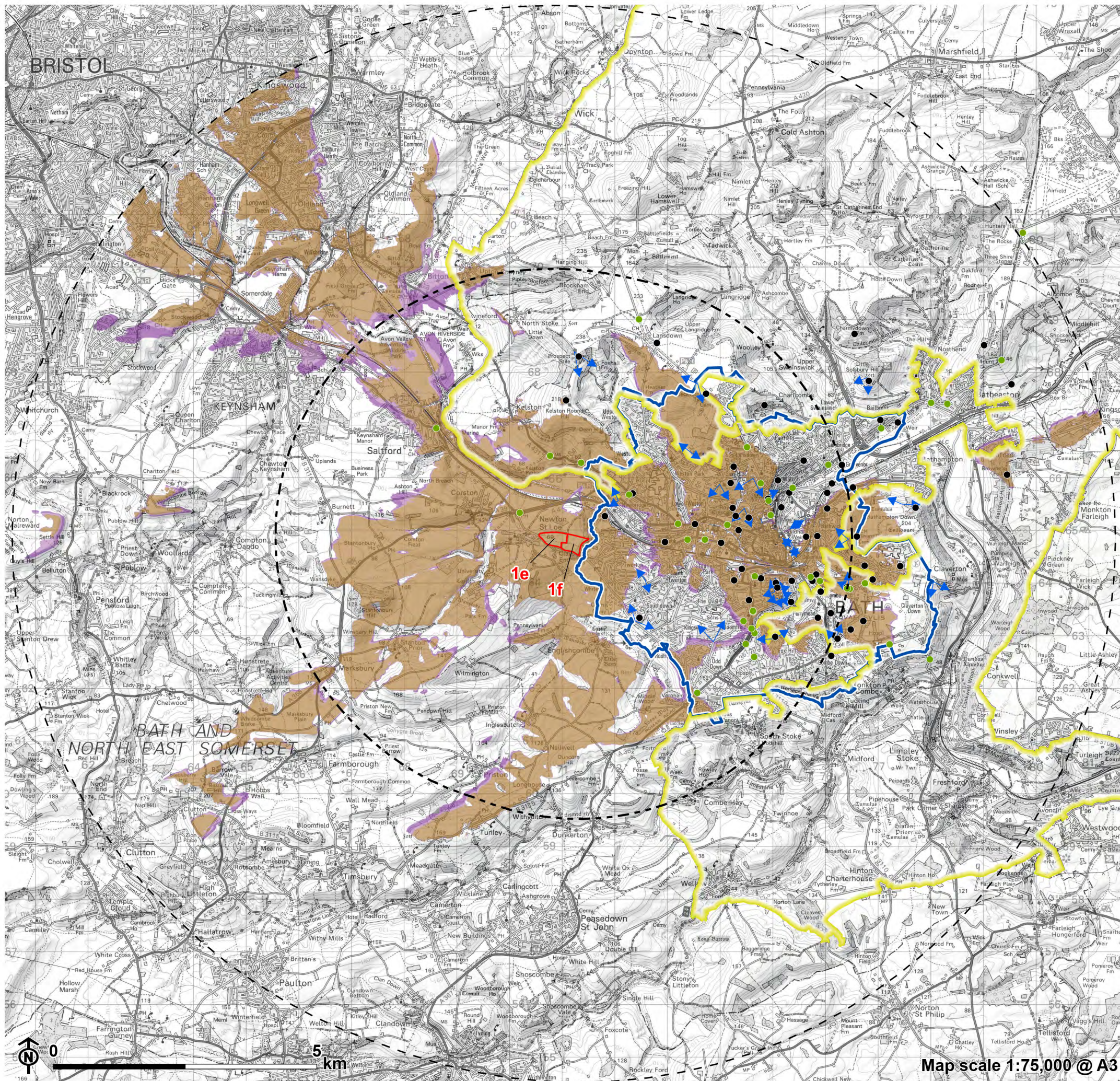
The terrain model assumes bare ground and is derived from 2m DTM (obtained from Environment Agency)

Earth curvature and atmospheric refraction have been taken into account.

The ZTV was calculated using ArcMap 10.8.1 software



Map scale 1:80,000 @ A3



**ZTV for Assessment Unit 1e & f**

- Assessment unit boundary
- 5km from assessment unit boundary
- 10km from assessment unit boundary
- Cotswolds National Landscape
- City of Bath World Heritage Site
- Potential development at 9m
- Potential development at 13m
- Assessment Unit 1e & f 20m
- Potential development at 20m
- ↔ WHS SPD Viewpoints
  - WHS SPD Historic Viewpoints
  - WHS SPD Road Viewpoints

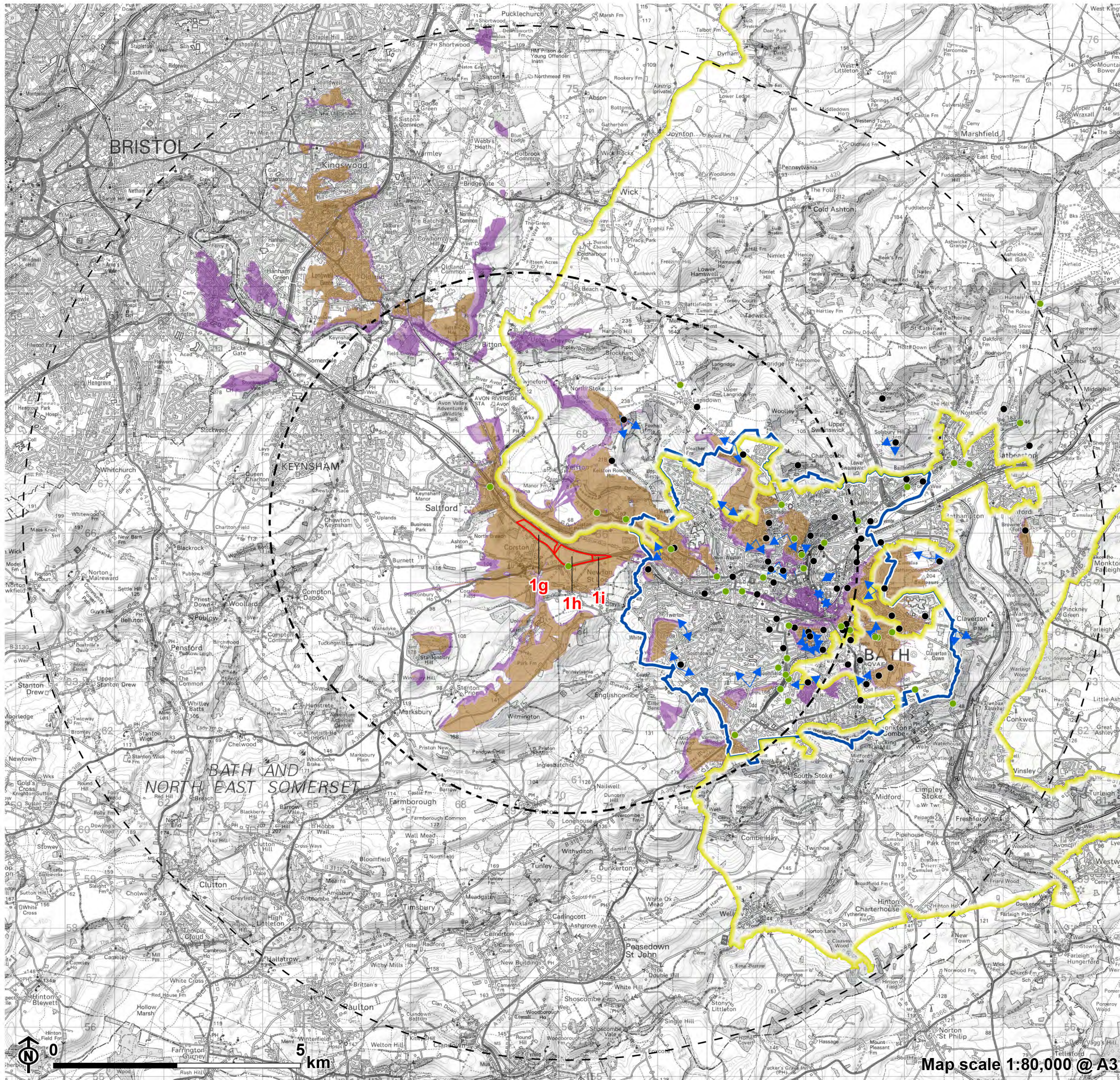
**Notes**

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

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

Earth curvature and atmospheric refraction have been taken into account.

The ZTV was calculated using ArcMap 10.8.1 software



**ZTV for Assessment Unit 1g, h & i**

- Assessment unit boundary
- 5km from assessment unit boundary
- 10km from assessment unit boundary
- Cotswolds National Landscape
- City of Bath World Heritage Site
- Potential development at 9m
- Potential development at 13m
- Potential development at 20m
- ↔ WHS SPD Viewpoints
- WHS SPD Historic Viewpoints
- WHS SPD Road Viewpoints

**Notes**

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

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

Earth curvature and atmospheric refraction have been taken into account.

The ZTV was calculated using ArcMap 10.8.1 software

## Appendix B

# Attributes of the City of Bath World Heritage Site

## Roman Archaeology

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

## The Hot Springs

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

## Georgian Town Planning

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



## **Appendix B** Attributes of the City of Bath World Heritage Site

14. The Kennet & Avon Canal, Somerset Coal Canal and associated features.
15. The influence of Georgian town planning in Bath on subsequent developments in the UK and beyond.
16. The creation of wide, flat pavements to encourage promenading.
17. The harmonious and logical integration of individual Georgian developments, with residential terraces interspersed with public buildings such as Assembly Rooms and Pump Rooms, and multiple architects building to a common ethos rather than to an overall master-plan.
18. The principal historic road routes into the city, marking the arrival points for visitors who almost universally came by road.
19. The design of the Georgian city as a theatre set, with visual surprises and open spaces linked with one another.
20. C18<sup>th</sup> picturesque principles including the relationship of buildings to landscape, the concept of blending countryside and town, and historic parks and gardens.

## **Georgian Architecture**

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

## **Appendix B** Attributes of the City of Bath World Heritage Site

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

## **Appendix B** Attributes of the City of Bath World Heritage Site

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

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

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

## Georgian Architecture Reflecting 18<sup>th</sup> Century Social Ambitions

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

## **Appendix B** Attributes of the City of Bath World Heritage Site

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

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

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

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

## References

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

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