

## CITY OF BATH WHS SETTING SPD CONSULTATION DRAFT

### COMMENTS BY THE FEDERATION OF BATH RESIDENTS' ASSOCIATIONS

Reference	FoBRA comment	Explanation
Chapter 1 introduction	Amend to read: <i>The key purpose of this document is to provide information to define the setting and provide the tools needed for the effective protection of the World Heritage Site.</i>	The aim of producing a setting SPD is to protect the WHS. Need to avoid giving the impression that it is meant to be a new and higher designation to protect the areas close to the city.
	Amend third bullet point to read: <ul style="list-style-type: none"> <li>• <i>Outlines the process for assessing impacts of developments in the setting which affect the WHS</i></li> </ul>	Ditto
	Add to end of last paragraph:  <i>....and to act as a reference document for the future.</i>	Much valuable research material.
Para 1.01	Amend first sentence to read: <i>The protection of any World Heritage Site (WHS) includes protection of its setting.</i>	Need to make clear that the purpose is to protect the WHS.
Para 1.05	Amend to read: <i>It will give greater clarity and certainty in decision making affecting the WHS and will be a key document to guide the management of the setting.</i>	Need to put the emphasis on the WHS.
Para 1.09	Amend fourth sentence to read: <i>The boundaries of the setting should not be seen as fixed...</i>	The inside and outside boundaries should be seen as open to change in the light of circumstances.
Para 1.10	Amend to read: <i>The City of Bath WHS is unusual in its size, encompassing</i>	Many of the most important parts of the setting (eg Beechen Cliff, Beacon Hill, Rainbow Wood, the river

	<i>the whole city. As a result the setting of the most important heritage assets begins within the city boundary, and in some cases extends outside it. It is also complex...</i>	Avon) which protect key heritage assets lie within the city boundary. This needs to be recognised. The setting should start from the heritage assets, not from the city boundary.
New Para 1.11	<i>The Setting SPD is not intended to create a buffer zone or cordon sanitaire around the city, within which development is excluded. Its purpose is (a) to recognise that there are areas close to the city, within which proposals for development are likely to come forward, (b) to provide a framework for assessing the positive and negative impacts they may have on the WHS, and (c) to facilitate those where the balance is positive.</i>	Important to make clear that the SPD is not intended to prevent all development in the WHS setting.
Para 2.10 and box on page 10	Amend to read: <i>Secondly to ensure that the setting is appropriately managed to protect the WHS.</i>	Emphasise that the purpose is to protect the WHS.
Para 2.16	Delete <i>'and that substantial harm...wholly exceptional'</i> .	This phrase in the NPPF appears to relate to the WHS itself, not to its setting.
Para 3.01	Amend last sentence to read: <i>This is still a valued characteristic of the city today with the green setting within and beyond the city forming a positive backdrop to people's lives.</i>	Emphasise that the setting starts within the city.
Para 3.06	Amend first bullet to read: <i>Views from the city to undeveloped and treed slopes within and around the edge of the city...</i>	Ditto
Chapter 4 introduction (page 17)	Delete <i>'and further evidence may indicate that the setting extends beyond the outer boundary indicated'</i>	It is unnecessary and unhelpful to encourage the idea that the setting might extend even further than proposed.

Para 4.04	<p>Amend first bullet to read:</p> <p><i>...This indicated that a minimum distance of 1.5 km was required from the key heritage assets.</i></p>	<p>The key point of reference in protecting the OUV should be the heritage assets within the site, not the administrative boundary of the city, which was chosen to define the WHS.</p>
	<p>Amend second bullet to read:</p> <p><i>...including views from key heritage assets to undeveloped slopes.</i></p> <p>Amend third bullet to read:</p> <p><i>...and provide understanding...</i></p>	<p>Ditto</p> <p>Typo</p>
Para 4.05	<p>Amend to read:</p> <p><i>It should not be considered as the definitive area where changes could have an adverse impact on the WHS. There may be changes proposed within the defined setting which are necessary to protect or enhance the site and our understanding of it. The map should therefore be seen as a useful tool indicating where changes have greatest potential for impacting on the WHS. The assessment...</i></p>	<p>It is unnecessary and unhelpful to encourage the idea that the setting might extend even further than proposed.</p> <p>Need to emphasise that changes may be needed in the setting to protect the WHS.</p>
Chapter 5 introduction, page 21	<p>Amend first bullet to read:</p> <ul style="list-style-type: none"> <li>• <i>The character of the green undeveloped farmland, green spaces and trees and woodland which surround the key heritage assets.</i></li> </ul>	<p>The key point of reference in protecting the OUV should be the heritage assets within the site, not the administrative boundary of the city, which was chosen to define the WHS.</p>
Para 5.05	Delete fourth sentence	Both the examples quoted (Sham Castle and Beckford's Tower) lie within the WHS boundary.
Para 5.06	<p>Amend first sentence to read:</p> <p><i>At its simplest the setting of the WHS is the surroundings around the key heritage assets.</i></p>	<p>The key point of reference in protecting the OUV should be the heritage assets within the site, not the administrative boundary of the city, which was chosen to define the WHS.</p>

Para 5.09	Amend last sentence to read: <i>The green elements within the site are an important part of the setting.</i>	Emphasise that the setting starts within the city.
Chapter 5, page 25	Photo “Bathampton to Brown’s Folly” - delete	This serves no purpose except to encourage belief in a wider Setting area.
Para 5.10	Delete last sentence.	Visibility from key assets within the WHS surely has to be the most important criterion in protecting the OUV.
Para 5.12	Amend to read: <i>The extent of the area needed to protect the OUV is dictated by the topography and the diminishing relationship to the key heritage assets with distance. A wide enough zone is required to maintain the green setting of the key heritage assets, to provide protection of the OUV and the site’s integrity, authenticity and significance and to facilitate understanding of the significance of the site. A zone of at least 1.5 km is proposed around the key heritage assets extending further in places to take account of the local topography.</i>	The purpose of the SPD is to protect the WHS, not to protect the landscape character of the setting (most of which is already protected as AONB and/or Green Belt).  Nor is it intended to maintain the compact nature and distinct entity of the city.  The key point of reference in protecting the OUV should be the heritage assets within the site, not the administrative boundary of the city, which was chosen to define the WHS.  No justification is advanced for a zone of 1.5 km, let alone any wider distance.
Paras 5.14 & 5.15	Delete	No purpose other than to encourage belief in a wider Setting area.
Para 5.24	Add at the end: <i>...thus contributing to the OUV.</i>	Emphasise that the setting starts within the city.
Para 5.34	Amend first sentence to read: <i>The visual aspects of setting consist of the views from key heritage assets, extending in some places out beyond the city boundary as well as...</i>	The key point of reference in protecting the OUV should be the heritage assets within the site.

	Delete in fourth sentence: <i>‘though in practice this may be less or more for example views to rising land may be affected to some 6.5 km or more’.</i>	It is unnecessary and unhelpful to encourage the idea that the setting might extend even further than proposed.
Para 5.38	Delete last sentence.	The setting starts within the city, and the SPD should treat the WHS and its setting as a continuum, not as separate areas.
Para 5.39	Delete last sentence.  Second last sentence: delete “adverse”	It is unnecessary and unhelpful to encourage the idea that the setting might extend even further than proposed.  Impact can be beneficial too.
Para 5.40	In fifth sentence, delete reference to Camden Crescent.	Camden Crescent is not easily accessible from the riverside.
Para 5.41	In fourth sentence, after Twerton insert Ensleigh.	Recent development just below the skyline is now visible at Ensleigh.
Para 5.43	Reconsider first sentence.	Apart from Little Solsbury Hill, we question the inclusion of these various viewpoints. Although they offer wide views, these do not include key heritage assets in the WHS.
	Delete third sentence	The views of the key heritage assets from Prospect Stile are very limited.
Para 5.47	Delete reference to Beckford’s Tower.	The views of the key heritage assets from Beckford’s Tower are very limited.
Page 42	Delete photo of the Grenville Monument.	While historically poignant, the story of Sir Beville Grenville’s death has no relevance to the OUV. In any case it is on the hillside facing away from the WHS.
Para 5.54	Delete second sentence.	It goes without saying that a list of examples is not exhaustive.

Para 5.60	Question the relevance of more distant Roman sites, eg at Box, Atworth, Keynsham and Wellow.	
Para 5.63 (page 46)	Question the relevance of some of these locations, eg the Grenville Monument.	While historically poignant, the story of Sir Beville Grenville's death has no relevance to the OUV. In any case it is on the hillside facing away from the WHS.
Para 5.62 (page 47)	Question the inclusion of Prospect Stile, Kelston Roundhill and Brown's Folly.	There are limited views to the key heritage assets from these locations.
Para 5.65	Welcome the reference to these corridor views.	These are good examples of the vital parts of the setting which lie within the WHS boundary.
Para 5.72	Delete reference to Camden Crescent.	Camden Crescent is not easily accessible from the riverside.
Chapter 6 introduction (page 51)	Amend first bullet to read: <i>'Extensive use of agricultural land'</i>	18C agriculture was more mixed than the 20C monoculture: there would have been crops as well as grazing.
	Insert new bullet: <i>Provision for key infrastructure to protect the environment and OUV of the WHS.</i>	Need to recognise that the setting is not just a passive zone – it has a specific role in supporting the WHS, if the city itself is to thrive.
Para 6.02	Amend first sentence, and delete rest of para to read: <i>One of the key characteristics of the surroundings is the extensive agricultural land-use.</i>	18C agriculture was more mixed than the 20C monoculture: there would have been crops as well as grazing. Inappropriate now to insist on grazing.
New para after 6.05	<i>The setting is necessarily the place where important activities which support the WHS take place – food and energy production, employment, housing and transport. Any necessary development of such activities needs to be facilitated so that the OUV can be enhanced.</i>	Need to recognise that the setting is not just a passive zone – it has a specific role in supporting the WHS, if the city itself is to thrive.
Chapter 7,	Insert new key aspect in Work Stage B:	Need to emphasise that developments may have a

Page 58	<i>Describe the benefits of the development to the OUV of the WHS.</i>	positive benefit to the OUV.
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