

Review of Landscape Setting of Settlements

Bath & North East Somerset District Council



Final Report

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1: Introduction

1.1 Background and Scope

1.1.1 Alison Farmer Associates was appointed in October 2024 by Bath & North East Somerset (B&NES) District Council, to undertake a review of landscape issues related to their extant Setting of Settlement study and its associated Local Plan Policy. This review considers three key areas as follows:

1. The difference between landscape setting of settlement and an Area of Great Landscape Value (AGLV)
2. The methodology used in the B&NES Landscape Setting of Settlements Study and the associated Local Plan Policy wording
3. The definition of the setting of Saltford

1.1.2 It has included a review of:

- Landscape Setting of Settlements Placemaking Plan Evidence Base (December 2015)
- Submissions by Saltford Parish Council

1.1.3 It has also included reference to current national policy, published guidance and best practice studies including:

- *Townscape Character Assessment*, Landscape Institute Technical Guidance Note, (TGN 05/2017), Revised 2018.
- *National Planning Policy Framework* (December 2023)
- *Guidelines for Landscape and Visual Impact Assessment*, Landscape Institute/Institute of Environmental Management and Assessment, Third Edition 2013 (GLVIA3).
- *Assessing landscape value outside national designations*, Landscape Institute Technical Guidance Note (TGN 02/21).
- *The Setting of Heritage Assets*, Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), Historic England.
- *Guidance for Assessing Landscapes for designation as National Park or Area of Outstanding Natural Beauty*, Natural England (Updated June 2021)
- *Landscape Character Assessment*, Yorkshire Dales National Park (2020)

2: Difference Between Landscape Setting of Settlement and an Area of Great Landscape Value

1.2 What is Setting?

- 1.2.1 Setting is defined in the LI Guidance on Townscape Character Assessment Glossary as *'The context or environment in which something sits'* (page 20).
- 1.2.2 This correlates with the definition of setting in other contexts such as heritage assets as defined in the NPPF Annex 2, Glossary. This defines setting as *'The surroundings in which a heritage asset is experienced....Elements of a setting may make a positive or negative contribution to the significance of the asset, may affect the ability to appreciate that significance or may be neutral'*
- 1.2.3 Similarly, the NPPF (2023) makes reference to the setting of protected landscapes in paragraph 182 stating: *'The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.'*
- 1.2.4 It is clear from these definitions that setting is frequently understood in relation to something else be that a specific area (such as a National Landscape), a feature (such as a listed structure), or a specific settlement, and that setting enables the context or environment in which something sits to be better understood. In these circumstances the setting may contribute to the significance or valued qualities of an area/feature/settlement and may help conserve and enhance the qualities of the valued area/feature/settlement.

1.3 Setting of Settlements

- 1.3.1 *Guidelines for Landscape and Visual Impact Assessment* (GLVIA 3rd Edition) sets out on page 74 that when undertaking Townscape Character Assessment setting is a component of understanding the relationship of a built-up area to the wider landscape.
- 1.3.2 There are many examples of whole settlement studies which seek to express the value in the relationship between the settlement and wider landscape setting. Early studies such as the Winchester Setting Study (1998) sought to define areas of distinctive, supportive and connective landscape and townscape which reinforced sense of place. The definition of these different classifications are as follows:

- **Distinctive townscape/landscape**

Areas specifically recognisable and distinctive to Winchester. These include townscape and landscape components such as quintessential views, the interaction of buildings forming spaces or the setting to local events, landform, backdrops of the city, areas of rich bio-diversity, historic approach routes and landmarks of positive character.

- **Supportive townscape/landscape**

Areas which support the character of the historic cores and areas distinctive to Winchester. They provide the backdrop, ambience and bolster the sense of place of the city and its approaches by supporting and buffering its special character.

- **Connective townscape/landscape**

Townscape/landscape which is an integral part of the city of Winchester and its environs, but lacks individual distinction, or does not make a significant contribution to the setting of the city. Notwithstanding that some areas are divorced from or weakly attached to their landscape setting, they often include significant landscape or townscape features or provide views to such features.

1.3.3 This highlighted that not all areas of setting perform the same function or have equal value, and some areas are more fundamental in reinforcing sense of place than others.

1.3.4 More recent settlement studies such as those undertaken for the Yorkshire Dales National Park Landscape Character Assessment update (2020)¹ have provided an assessment of landscape setting of larger settlements and provided guidance for built development which contributes positively to their distinctive sense of place. This assessment mapped areas which fell within the visual landscape setting of the settlement and went on to define key landform which contains and contributes to the character and quality of the settlement's setting. It also mapped key views which describe the landscape setting, key landmarks, key public rights of way and principle vehicular route gateways as well as important open spaces and allocated development sites. The supporting text described the setting of the settlement and provided guidance which identifies the important landscape elements and features that structure the way each settlement is perceived and which merit conservation in relation to future landscape change, including built development.

¹ <https://www.yorkshiredales.org.uk/wp-content/uploads/sites/13/2021/02/YDNP-LCA-Overview-Report-lo-res-2.pdf>

1.4 Mapping Setting

- 1.4.1 Historic England's published guidance on *The Setting of Heritage Assets* (Planning Note 3 Second Edition) includes a section on the extent of setting (para 8 page 3). This states that:

'The NPPF makes it clear that the extent of the setting of a heritage asset is not fixed and may change as the asset and its surroundings evolve (NPPF, Annex 2: Glossary). All of the following matters may affect considerations of the extent of setting:

- *While setting can be mapped in the context of an individual application or proposal, it cannot be definitively and permanently described for all time as a spatially bounded area or as lying within a set distance of a heritage asset. This is because the surroundings of a heritage asset will change over time, and because new information on heritage assets may alter what might previously have been understood to comprise their setting and the values placed on that setting and therefore the significance of the heritage asset.*
- *Extensive heritage assets, such as historic parks and gardens, landscapes and townscapes, can include many heritage assets, historic associations between them and their nested and overlapping settings, as well as having a setting of their own. A conservation area is likely to include the settings of listed buildings and have its own setting, as will the hamlet, village or urban area in which it is situated (explicitly recognised in green belt designations).'*

- 1.4.2 In the same way, the setting of a settlement may also be mapped. The extent of the setting may be defined by visual analysis, accepting that change beyond the defined visual envelope may also impact on important skylines.

- 1.4.3 This is reflected in the Yorkshire Dales settlement studies which stated *'The landscape setting for each settlement is deliberately not shown as a definitive 'boundary' because it is based on subjective judgement and because the extent of important views will inevitably vary with changing weather and seasonal conditions'*. Therefore, the Yorkshire Dales settlement studies rely both on mapping and detailed descriptive text highlighting important landscape elements and features to inform future change and decision making.

1.5 Summary

- 1.5.1 The above text establishes a number of important principles regarding setting:

1. Setting is defined in relation to something else and enables the context or environment surrounding the area, feature or settlement to be better understood

2. Setting contributes to the significance and distinctiveness of a feature/area/settlement and how it is appreciated
3. Not all parts of a setting contribute equally
4. Setting can be mapped but is not necessarily definitive or fixed
5. Settings can overlap

1.5 Valued Landscapes: Area of Great Landscape Value (AGLV)

1.5.1 An Area of Great Landscape Value or AGLV is a local landscape designation often defined at Local Authority level and reflects landscape which are considered to have a specific value outside of national landscape designation. They are therefore considered to reflect a valued landscape.

1.5.2 A Valued landscape is defined in the Guidance on Landscape and Visual Impact Assessment (3rd Edition) as:

‘an area as having sufficient landscape qualities to elevate it above other more everyday landscapes².’

1.5.3 Valued Landscapes are referred to in the NPPF (Dec 23) at paragraph 180 which states:

Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

1.5.4 The Landscape Institute published a technical guidance note (TGN 02/21) titled *Assessing landscape value outside of national landscape designation* (February 2021). At appendix A4 it considers valued landscape ‘policy test’ in England. It notes that some Local Authorities have defined valued landscape but have no evidence base to support the designation, while others have an evidence base to illustrate valued qualities but no policy designation.

1.5.5 Determining whether a landscape is a valued landscape therefore requires evidence, irrespective of whether the landscape is identified and defined in policy terms within a development plan. The Landscape Institute supports this evidence-based approach. There should be a weight of evidence to support the recognition of a landscape as valued above more everyday landscapes.

² Accepting that everyday landscapes may nevertheless have value to people.

- 1.5.6 Furthermore, the LI Guidance (page 43) states that in line within the European Landscape Convention's approach, landscape that are not judged to be 'valued landscapes' may still have value, and NPPF paragraph 180 b) requires planning policies and decisions to recognise the intrinsic character and beauty of the countryside. It is well-established that a landscape does not have to be a 'valued landscape' to be afforded protection from inappropriate development.

1.6 Factors which Contribute to an Understanding of Value

- 1.6.1 The Landscape Institute Guidance (TGN 02/21) sets out in Table 1 the range of factors which can be used to determine if a landscape has particular value and is set out below:

Factor	Definition	Examples of indicators of
Natural Heritage	Landscape with clear evidence of ecological, geological, geomorphological or physiographic interest which contribute positively to the landscape	Presence of wildlife and habitats of ecological interest that contribute to sense of place Extent and survival of semi-natural habitat that is characteristic of the landscape type Presence of distinctive geological, geomorphological or pedological features Landscape which contains valued natural capital assets that contribute to ecosystem services, for example distinctive ecological communities and habitats that form the basis of ecological networks Landscape which makes an identified contribution to a nature recovery/ green infrastructure network
Cultural Heritage	Landscape with clear evidence of archaeological, historical or cultural interest which contribute positively to the landscape	Presence of historic landmark structures or designed landscape elements (e.g. follies, monuments, avenues, tree roundels) Presence of historic parks and gardens, and designed landscapes Landscape which contributes to the significance of heritage assets, for example forming the setting of heritage assets (especially if identified in specialist studies) Landscape which offers a dimension of time depth. This includes natural time depth, e.g. presence of features such as glaciers and peat bogs and cultural time depth e.g. presence of relic farmsteads, ruins, historic field patterns, historic rights of way (e.g. drove roads, salt ways, tracks associated with past industrial activity)
Landscape Condition	Landscape which is in a good physical state both with regard to individual elements and overall landscape structure	Good physical condition/ intactness of individual landscape elements (e.g. walls, parkland, trees) Good health of elements such as good water quality, good soil health

		Strong landscape structure (e.g. intact historic field patterns) Absence of detracting/ incongruous features (or features are present but have little influence)
Associations	Landscape which is connected with notable people, events and the arts	Associations with well-known literature, poetry, art, TV/film and music that contribute to perceptions of the landscape Associations with science or other technical achievements Links to a notable historical event Associations with a famous person or people
Distinctiveness	Landscape that has a strong sense of identity	Landscape character that has a strong sense of place (showing strength of expression of landscape characteristics) Presence of distinctive features which are identified as being characteristic of a particular place Presence of rare or unusual features, especially those that help to confer a strong sense of place or identity Landscape which makes an important contribution to the character or identity of a settlement Settlement gateways/approaches which provides a clear sense of arrival and contribute to the character of the settlement (may be ancient/historic)
Recreational	Landscape offering recreational opportunities where experience of landscape is important	Presence of open access land, common land and public rights of way (particularly National Trails, long distance trails, Coastal Paths and Core Paths) where appreciation of landscape is a feature Areas with good accessibility that provide opportunities for outdoor recreation and spiritual experience/ inspiration Presence of town and village greens Other physical evidence of recreational use where experience of landscape is important Landscape that forms part of a view that is important to the enjoyment of a recreational activity
Perceptual (scenic)	Landscape that appeals to the senses, primarily the visual sense	Distinctive features, or distinctive combinations of features, such as dramatic or striking landform or harmonious combinations of land cover Strong aesthetic qualities such as scale, form, colour and texture Presence of natural lines in the landscape (e.g. natural ridgelines, woodland edges, river corridors, coastal edges)

		Visual diversity or contrasts which contributes to the appreciation of the landscape Memorable/ distinctive views and landmarks, or landscape which contributes to distinctive views and landmarks
Perceptual (wildness and tranquillity)	Landscape with a strong perceptual value notably wildness, tranquillity and/or dark skies	High levels of tranquillity or perceptions of tranquillity, including perceived links to nature, dark skies, presence of wildlife/ birdsong and relative peace and quiet¹⁶ Presence of wild land and perceptions of relative wildness (resulting from a high degree of perceived naturalness¹⁷, rugged or otherwise challenging terrain, remoteness from public mechanised access and lack of modern artefacts) Sense of particular remoteness, seclusion or openness Dark night skies A general absence of intrusive or inharmonious development, land uses, transport and lighting
Functional	Landscape which performs a clearly identifiable and valuable function, particularly in the healthy functioning of the landscape	Landscapes and landscape elements that contribute to the healthy functioning of the landscape, e.g. natural hydrological systems/ floodplains, areas of undisturbed and healthy soils, areas that form carbon sinks such as peat bogs, woodlands and oceans, areas of diverse landcover (benefits pest regulation), pollinator-rich habitats such as wildflower meadows Areas that form an important part of a multifunctional Green Infrastructure network Landscapes and landscape elements that have strong physical or functional links with an adjacent national landscape designation, or are important to the appreciation of the designated landscape and its special qualities

1.6.2 Valued landscapes, such as AGLV, are often identified through community or professional input. The LI Guidance sets out some advice on the practical application of the factors set out in the table above as follows:

- The factors to be considered are not fixed as they need to be appropriate to the particular project and location.
- The relative importance to be attached to each indicator is likely to vary across different landscapes. Once evidence for each factor has been collated and assessed, it is important to step back and judge the overall 'weight of evidence' in coming to an overall judgement on landscape value.

- There are likely to be overlaps between the factors, as well as overlaps with other specialist studies for example in relation to natural and cultural factors. These overlaps should be acknowledged and considered when presenting conclusions on the overall value of the landscape.
- While condition/intactness of a landscape is one factor that can influence value, poor landscape management should not be a reason to deny a landscape a valued status if other factors indicate value. Deliberately neglecting an area of landscape and allowing its condition to deteriorate should not be allowed to diminish its value in a planning context.
- When assessing landscape value of a site as part of a planning application or appeal it is important to consider not only the site itself and its features/elements/ characteristics/qualities, but also their relationship with, and the role they play within, the site's context. Value is best appreciated at the scale at which a landscape is perceived – rarely is this on a field-by-field basis.
- Landscape function can influence value, but the presence of a spatial designation (e.g. Green Belt or Green Gap) is not in itself an indicator of high landscape value.
- The presentation of information about landscape value should be proportionate to the task at hand.
- Landscape value, and the way in which landscapes are valued by people, is a dynamic process, and can change over time. Any value assessment will be a snapshot in time.

[emphasis added]

1.7 Mapping of AGLV

- 1.7.1 Those areas which are considered to express the greatest weight of evidence supporting recognition can be spatially defined as AGLV. They may be mapped and used to develop specific policy within Development Plans. Identifying areas which qualify as AGLV requires professional judgment. Best practice approaches to defining boundaries has been developed by Natural England in relation to their National Landscape designation work (*Guidance for Assessing Landscapes for designation as National Park or Area of Outstanding Natural Beauty*, Natural England (Updated June 2021)).

1.8 Integrating an Understanding of Value into Character Assessment and Neighbourhood Plans

- 1.8.1 Landscape Institute on Technical Guidance Note *Assessing landscape value outside national designations* (TGN 02/21) shows in Figure 1 on page 4 that landscape value can be assessed at different stages of the planning process. This diagram highlights that an understanding of value can be linked to landscape character assessment where value is expressed as the landscape qualities of character areas and types.

- 1.8.2 In these landscape character assessments, the reporting goes beyond simply classifying and describing but also includes a degree of evaluation and professional judgment.
- 1.8.3 Whilst this does not constitute defining the geographical extent of a 'value landscape', it does set out those characteristics and qualities which are considered to be of special value. It is therefore a particularly useful way of expressing elements and features of a landscape which are of value.
- 1.8.4 Development Plans may include policy related to conserving and enhancing the character of landscapes as described within their landscape character assessments. This is a further way in which the value of a landscape can be articulated and evidence relating to these qualities can be supported by planning policy and used to inform decision making.
- 1.8.5 Similarly, landscape character assessments undertaken at the local level can provide an important evidence base to support the development of policy within neighbourhood plans which seeks to highlight characteristics and features of the landscape especially valued at a local level.

1.9 Summary

- 1.8.1 The above analysis establishes a number of important principles regarding valued landscape:
 - 1. There are commonly recognised factors which contribute to an understanding of value.
 - 2. Valued landscape can be defined and mapped but must be supported by an evidence base.
 - 3. Areas which are not identified as a valued landscape in policy terms can nevertheless have value to a local community.
 - 4. It is possible to integrate an understanding of value into landscape character assessment, especially local character assessments which inform the development of policy within a neighbourhood plan.

1.10 Conclusions on Key Differences

- 1.10.1 In general terms the definition of a settlement setting or AGLV will highlight landscape of particular importance. Both approaches require evidence to justify such recognition and to inform decision making. Both are valid ways of conserving and enhancing qualities and are compatible with National Policy as set out in the NPPF (Dec 2023) para 180a in that they may both provide evidence as to why landscape is valued and may be given a status or named as an identified quality in a development plan. However, as

indicated above, there are also other ways in which evidence on landscape qualities can be articulated which may be used in policy development and decision making i.e. articulation of special characteristics and features as part of a landscape character assessment and which may be compatible with NPPF para 180a and or 180b.

1.10.2 More specifically there are some notable distinctions between the setting of a settlement and AGLV as follows:

1. The landscape setting of a settlement focuses on the immediate context and visual relationship of a settlement with its surroundings and identifies landscape which contributes to the recognised qualities of the settlement. In contrast a AGLV is not settlement focused but more broadly identifies landscapes recognised for their unique qualities and contributions to wider environmental, cultural, or social values.
2. Land within a setting of a settlement may contain particular areas which are especially important in terms of defining sense of place in relation to a settlement - it may therefore define relatively discrete areas of importance. In contrast a AGLV tends to comprise a more extensive tract of land which expresses consistent special qualities over a wider geographical area.

1.10.3 Mapping settlement settings and AGLV presents issues because landscape rarely changes abruptly. Change beyond a settlement setting may still impact the settlement while land outside of a AGLV may still be of value. Nevertheless, mapping and carefully worded text can help to identify those areas which are regarded as particularly important.

1.10.4 This analysis demonstrates that the landscape setting of a settlement and an AGLV represent two distinct yet interconnected concepts in landscape planning and assessment. Along with landscape character assessment, it highlights that there is no single way of being able to articulate what matters and why, but a range of tools that can be usefully engaged.

1.10.5 The approach adopted should seek to reflect any earlier methods used to articulate value where they have proven useful but should also be fit for purpose i.e. it should address current issues in order to inform decision making to best effect. Pragmatism is therefore necessary, adopting a proportionate approach which informs decision making within the context of local authority finite resources.

3: Methodology and Policy Associated with B&NES Landscape Setting of Settlements

3.1 Introduction

- 3.1.1 This section includes a review of a) the methodology associated with the Bath & North East Somerset Landscape Setting of Settlements study Placemaking Plan Evidence Base (Dec 2015) and b) associated policy in the current Local Plan, in the context of national policy, published guidance and best practice studies.

3.2 Review of Methodology

- 3.2.1 Bath & North East Somerset (B&NES) published the Landscape Setting of Settlements (Policy NE2A) Placemaking Plan Evidence Base in December 2015. The purpose of this work was to provide an evidence base and justification for identifying specific areas which are important in defining sense of place. The methodology used to define the setting of specific settlements in Bath & North East Somerset is set out on pages 5 and 6 of the Placemaking Plan Evidence Base document. This methodology has been reviewed and the following observations made:

1. The methodology was applied to specific settlements where it was anticipated there would be greatest pressure from development.
2. It involved both desk top assessment and field assessment.
3. A range of data sets were used to inform the assessment including OS mapping, satellite data, aerial photography, vegetation, settlement patterns, landscape character assessment, neighbourhood plan and Village Design Statements, local historical research.
4. The landscape surrounding a settlement was considered in relation to three categories – natural factors, cultural and human factors and visual and perceptual factors (Table 1, page 6).
5. The factors set out in Table 1 are those which are considered to contribute to the District's distinct character and are relatively generic in their expression. rather than specifically worded to reflect the focus on settlements.
6. The factors set out in Table 1 did not include recreation although it is noted that they should not be regarded as fully comprehensive, and in some of the explanatory text for settlements, reference is made to recreational routes such as Bristol and Bath Railway path.
7. The extent of mapped areas is recognised as fluid and may evolve over time and boundaries as mapped are not necessarily clear cut (page 5).
8. In some instances, settlement settings may overlap e.g. Saltford and Bath.

Landscape character evidence base

- 3.2.2 As noted above, the Landscape Setting of Settlements study was informed by existing landscape character assessment which comprised *The Rural Landscapes of Bath & North East Somerset – A Landscape Character Assessment SPG (2003)*. This assessment defined 18 discrete character areas.
- 3.2.3 Since then, the landscape character assessment has been updated firstly in 2017 comprising an assessment for the area surrounding Bath (Bathscape), and then a further assessment for the wider District in 2021. This new character assessment (and the accompanying Landscape Strategy) now forms part of the evidence base to support the Local Plan 2016-2036.
- 3.2.4 This updated assessment provides further detail and understanding of variations in landscape character and special qualities (as set out in the accompanying Landscape Strategy). There is therefore some merit in reviewing the Landscape Setting of Settlements study to ensure it draws on this evidence and is up to date.

Factors used to make judgements

- 3.2.5 The factors used in the Landscape Setting of Settlements study (as set out in Table 1 of the report) require an element of judgment. For example, the factors look for aspects of the landscape which are regarded as distinctive (i.e. above the ordinary) or associated with historical land uses, events, people (which adds meaning), express a particular quality or aesthetic or form a part of special views and viewpoints or contribute to the positive perceptions of a place. As noted above these factors are relatively generic (relating to the distinctiveness of the District as a whole) and have been applied in the specific context of settlement to enable a judgment on whether land makes a particular contribution to the distinctive character of a settlement. Only areas which contributed positively to the form of the settlement; the distinctive character of the settlement or influence the creation of a strong sense of place, were defined and mapped (page 5).
- 3.2.6 The judgemental aspect of the assessment has parallels with landscape evaluation, in order to identify the relative importance of a landscape. However, the assessment does not equate to identifying an AGLV (which is a wider concept), nor does it specifically utilise the factors set out in Table 1 of the Landscape Institute Technical Guidance Note (TGN 02/21), although there is some correlation. The factors set out in Table 1 of the Landscape Setting of Settlements study reflect the District's distinct character and have been applied with a primary focus on the contribution of landscape to specific settlements. However, there is no explanation of how the factors in Table 1 apply specifically to settlement. For example, the factor '*distinct landform/geomorphology/geology...which helps to define a place...*' may in the context of a settlement be expressed as 'distinct landform which visually defines the settlement or has influenced its evolution and form.' This leads to a lack of transparency in how judgement have been reached.

Understanding what the mapped areas represent

- 3.2.7 The mapped areas in the Landscape Setting of Settlement study reflect those parts of the setting which make a particular contribution to the settlement because of their positive attributes. In other words, the mapping does not simply show the ‘setting of the settlement’ which could be argued to comprise all land surrounding a settlement, but rather only land which is regarded as having a particular value in contributing to the settlement. It is clear therefore that not all land surrounding a settlement is valued equally.

Describing those area which make a particular contribution to settlement

- 3.2.8 The Landscape Setting of Settlements study goes on to provide a description of the mapped areas. This sets out how the factors in Table 1 of the document are expressed in a specific area and helps to capture and articulate local sense of place. However, the justification text provides no information on why other areas are excluded. This does not mean the conclusions are unsound, but does lead to a lack of transparency on how judgements have been reached.

Additional clarification

- 3.2.9 Other areas which might also benefit from additional clarification relate to the following:

Status of Bath Setting in relation to the Bath WHS Setting:

- 3.2.10 The Landscape Setting of Settlements study includes a defined setting for Bath. No reference is made to the Bath World Heritage Site setting which was defined in August 2013 and it would be helpful to clarify the differences between these two types of setting, given their geographical overlap.

Treatment of National Landscape where it forms a backdrop to a settlement

- 3.2.11 Land which forms part of an existing National Landscape e.g. Cotswolds, may also form part of the setting of a settlement e.g. it may comprise distinctive hillsides or skyline features which form an immediate backdrop to the settlement, enhancing sense of place. It is not clear why some hillsides within National Landscapes are included in a defined setting (e.g. for Bath) and not others (e.g. for Saltford).

Function of land as a gap between two settlements

- 3.2.12 Where relatively small areas of open countryside lie between settlements it may be regarded as particularly important in retaining a sense of place, even though the landscape itself may lack distinction or special qualities. It is not clear if the function of a landscape in providing a sense of separation has been taken into account and the extent to which this function is considered addressed by Green Belt policy which surrounds many of the settlements.

- 3.2.13 Each of these issues suggest a need to review and update the Landscape Setting of Settlements study, improving clarity and transparency and ensuring its continued robustness going forward.

3.3 NPPF and Valued Landscapes

- 3.3.1 Para 180a of the NPPF states that *‘Planning policies and decisions should contribute to and enhance the natural and local environment by:*
- a) Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)’.*
- 3.3.2 Of particular relevance is the wording *‘manner commensurate with their statutory status or identified quality in the development plan.’*
- 3.3.3 Whilst the definition of landscape setting to a settlement does not equate to a statutory status nor an Area of Great Landscape Value (which is broader in concept), it nevertheless constitutes a defined value within the Bath & North East Somerset Core Strategy and Placemaking Plan (incorporating the Local Plan Partial Update Jan 2023). It is also supported by an evidence base - Landscape Setting of Settlements (Policy NE2A) Placemaking Plan Evidence Base (December 2015). In this regard it is reasonable to conclude that it engages Para 180a of the NPPF.
- 3.3.4 This does not mean that landscapes which lie outside of National Landscapes and beyond areas defined as making a particular contribution to settlement are without value. The NPPF paragraph 180b) requires planning policies and decisions to recognise the intrinsic character and beauty of the countryside. It is well-established that a landscape does not have to be a ‘valued landscape’ in NPPF terms to be afforded protection from inappropriate development. In such circumstances, intrinsic character and beauty can be articulated in landscape character assessments and strategies and at a more local level such as in landscape appraisals which support neighbourhood plans.

3.4 Policy NE2 and NE2A

- 3.4.1 Policy NE2A Landscape Setting of Settlements forms part of the Bath & North East Somerset Core Strategy and Placemaking Plan which was partially updated in January 2023. Policy NE2A remained unaltered in the update.
- 3.4.2 Policy NE2A works alongside two wider landscape policies namely:

- Policy CP6 ‘Environmental Quality’ which seeks to conserve and enhance the distinctive character and quality of the District’s distinct urban and rural landscape and
- Policy NE2 which provides a more detailed policy framework to ensure landscape character and quality is protected, conserved and enhanced across the District.

Policy NE2

3.4.3 Policy NE2 is supported by the most recent landscape character assessment for the District (2021). This assessment ensured consistency with the Bathscape assessment and those of adjoining National Landscapes. The 2021 LCA built on the character areas defined in the 2003 assessment and subdivided them to reflect finer grain differences in landscape character and included more detailed supporting descriptive material. For each character area there is now a detailed description which includes:

- Location and summary
- Key characteristic
- Geology and soils
- Landform and drainage pattern
- Semi-natural habitats and tree cover
- Agriculture and land use
- Fields and boundaries
- Historic environment
- Development and infrastructure
- Views and perceptual qualities

3.4.4 The LCA provides descriptive material only and provides no judgement on the special qualities or sensitivity of the landscape. However, it was accompanied by a separate Landscape Strategy document (August 2021), which sets out an evaluation of each of the broader landscape character types. For each landscape type evidence is provided relating to:

- Summary description of the LCT
- Valued landscape attributes and features
- Forces for change impact on landscape character and condition
- Landscape guidance under the key headings of protect, manage and plan in line with the principles of the European Landscape Convention (ELC).

3.4.5 The strategy notes that the valued landscape attributes and features of each landscape type are those which are fundamental to character and therefore the most sensitive to change (para 2.3). The strategy provides an element of judgement regarding elements of the landscape which are particularly valued and provides another useful evidence base. Whilst the criteria used to make judgements on landscape value are not set out in the document, it is understood that they are based on professional judgement and community consultation. However, they are relatively high level, relating only to the broad character types, and do not necessarily identify local features which contribute to sense of place.

Policy NE2A

- 3.4.6 Policy NE2A specifically focuses on conserving and enhancing landscape which makes a particular contribution to the settlements of Bath & North East Somerset.
- 3.4.7 Policy NE2A is called ‘Landscape Setting of Settlements’. As noted above, setting could be interpreted to include all land which surrounds a settlement. However, the Landscape Setting of Settlements Placemaking Plan Evidence Base document makes clear that *‘it should be understood that it is not the intention of Policy NE2A to map a definitive green edge to each settlement’* (page 5). The title of the policy does not make this explicit.
- 3.4.8 Nevertheless, the explanatory text for Policy NE2A helps to clarify this and sets out that landscape settings:
- Contribute to distinctive character and quality
 - Are highly valued reflecting their significance as places where people live and work
 - Comprise land surrounding a settlement as well as areas which may be within the settlement and are important to the context of the developed area.

Purpose of NE2A

- 3.4.9 Para 252 and Para 260 both set out the purpose of Policy NE2A but provide slightly different wording.

Para 252 states:

‘The purpose of Policy NE2A is to ensure the protection of key landscapes and landform, landmarks and views / viewpoints which particularly contribute to the landscape setting of settlements.’

Para 260 states:

‘The purpose of Policy NE2A is to protect, conserve and enhance the landscape setting of settlements.’

- 3.5.10 This differing wording presents some potential for confusion and could be open to misinterpretation.

Application of Factors set out in Table 6

- 3.5.11 Table 6 of the Local Plan lists key factors which contribute to the District’s distinct character and are set out in relation to the more general Policy NE2. However, the explanatory text for Policy NE2A at Para 252 also makes reference to Table 6, while para 253 makes reference to Table 1 of the of Settlements Placemaking Plan Evidence Base document, which contains the same factors as Table 1. As noted above, these factors are general in nature relating to the District as a whole and there is no explanation of how the factors apply specifically to settlement.

3.6 Conclusions

- 3.6.1 This review has highlighted that the methodology used to define areas of particular importance within the Setting of Settlements study follows best practice principles in that it:
- Defines setting in relation to something else - in this case settlements. It therefore has a specific focus.
 - Maps specific geographical areas of setting which make a particular contribution to local distinctiveness.
 - Acknowledges that any areas which are mapped are not definitive.
 - Acknowledges that the factors set out in Table 1 are not necessarily comprehensive. These factors have some correlation with factors used for assessing valued landscape (LI TGN 02/21), but their focus is on settlements.
- 3.6.2 This review has highlighted a need to update the Landscape Setting of Settlements study taking account of new data relating to landscape character and distinctive qualities, as well as for greater transparency in a) how judgements were reached utilising the factors in Table 1 (as highlighted in para 3.2.6 above) and b) why land is excluded from the mapped areas.
- 3.6.3 The mapped areas of setting are supported by an evidence base and are associated with policy and defined value within the Local Plan. They are therefore regarded as comprising a valued landscape in NPPF terms.
- 3.6.4 The definition of the setting of a settlement has a particular focus (i.e. the settlement), and it is therefore not appropriate to consider it equivalent to, or to redefine it as, AGLV.
- 3.6.5 The review of relevant landscape policy in the Bath & North East Somerset Local Plan, suggests a need for greater clarity in the wording which defines the purpose of Policy NE2A and in the specific use of the factors set out in Table 6/Table 1.
- 3.6.6 The Landscape Character Assessment Strategy is high level and does not contain information on local features of value. An update/review of the Settlement Setting study could provide an opportunity for local landscape character assessment work to be more fully integrated. Similarly landscape appraisals undertaken to support neighbourhood plans can be used to identify landscapes of importance for recreation, Local Green Space and the identification of local landmarks and features of value. However, it should be noted that Neighbourhood Plans and the landscape appraisals which support them, can vary in terms of their quality and detail, and are less suitable for larger settlements such as Bath.

4: The Definition of the Setting of Saltford

4.1 Introduction

- 4.1.1 This section looks specifically at the defined Setting Policy Areas for the settlement of Saltford. Over recent years, and in the context of the Bath & North East Somerset Local Plan review, Saltford Parish Council have questioned the extent of the mapped setting areas for Saltford and identified other areas they believe are worthy of recognition. This section therefore considers the special qualities of the defined Setting Policy Areas for Saltford as set out in the Placemaking Plan Evidence Base (2015) and whether there are other areas within the setting which may justifiably be included within the Setting Policy Areas.
- 4.1.2 Building on Sections 2 and 3 of this report, this Section seeks to answer the following questions:
- 1 Is the extent of Saltford's setting robust in terms of the B&NES methodology?
 - 2 Does the additional land identified by the Parish of Saltford also meet the criteria to form part of the setting of Saltford?
 - 3 Is the additional land identified by the Parish of Saltford suitable for recognition as AGLV and if so on what grounds?
 - 4 Should there be an additional policy which identifies valued landscape in addition to setting policy or is an understanding of value sufficiently articulated in existing landscape character assessment (LUC 2021)?
- 4.1.3 Specific reference has been made to the following documents:
- AGLV or LGS for Saltford South – Case Paper (January 2023)
 - Landscape Designation of Saltford South: Reaffirmation of application with outcome options (January 2024)
 - The Saltford Area of Great Landscape Value (March 2024)
 - Setting of Settlements Placemaking Plan Evidence Base (December 2015)

4.2 Overview of Setting

- 4.2.1 The setting of Saltford is defined primarily by the River Avon and by the rising slopes of the Cotswolds National Landscape to the northeast. The distinctive tree clump and conical hill, Kelston Round Hill, which lies within the Cotswolds National Landscape, is a key landmark feature seen from the setting and within the settlement itself. To the south the setting is defined by the gentle slopes which rise to form a ridge of higher land.

- 4.2.2 To the west the setting is less distinct, sloping away from the settlement and comprising farmland, woodland and a small watercourse which separates the village from Keynsham. To the north is arable farmland on the relatively flat floodplain of the River Avon.
- 4.2.3 The historic core of the village is located between the River Avon in the east and railway line in the southwest. The modern extension of the village lies to the west of the railway.
- 4.3.4 All of the land immediately surrounding Saltford falls within Green Belt.

4.3 Setting Policy Areas

- 4.3.1 The Setting of Settlements Placemaking Evidence Base (2015) defined two areas of setting which make a particular contribution to the character and distinctiveness of Saltford and to which Local Plan Policy NE2a applies. Area 1 lies to the south of the settlement and Area 2 to the northeast. The qualities of each of the areas are described in the evidence base document. These descriptions, along with evidence provided in documents submitted by Saltford Parish Council, and additional site assessment undertaken on the 3 and 4 October 2024, has enabled the qualities of Area 1 and Area 2 to be summarised below.

Setting Policy Area 1: Land to South of Saltford

- Gently rising southern slopes which form an attractive and subtle backdrop to the village
- Topographic variation especially associated with tributary valley which contains ancient woodland, Folly Wood
- Saltford golf course covers a significant part of the area and is well treed
- Distinctive tree belt along Longwood Lane (former Parish boundary) which adds to the leafy character
- To the west, land use comprises arable fields, with some smaller scale fields around North Breach
- Enclosure patterns comprise late medieval open fields created by local arrangement and exchange. There is some evidence of field amalgamation post 1965 and loss of pattern across golf course area
- Historic lanes include Longwood Lane and Gypsy Lane
- Elevated views at junction of Longwood Lane and Gypsy Lane reflecting the low-lying position of Saltford adjacent to the River Avon, with the rising Cotswold Ridge beyond
- Scenic qualities derived from topographic variation and patterns of vegetation and longer distant views
- Strong rural tranquillity away from urban edge and roads

Setting Policy Area 2: Land to the northeast

- Land along the Avon important for ecology (River Avon is a Site of Nature Conservation Importance), tranquillity, scenic qualities and sense of place
- Area comprises the immediate landscape context to the historic core of the settlement /Conservation Area
- Area includes identified valued views in Conservation Area Appraisal and intervisibility between the historic core and wider landscape landmarks such as Kelston Round Hill and Cotswold Ridge
- Landscape reinforces the origins of the settlement on a river crossing point and its growth as a result of the river
- Landscape context to designated historic landmark buildings (church and manor and Brass Mill) including associated historic features such as Medieval fishpond to the north of church
- Rural tranquillity immediately adjacent to historic core
- Unity of building materials reflecting underlying geology – Lower Jurassic limestone
- Disused railway – connects growth of Saltford to Victorian era and also now of recreation importance
- Promoted local walks within the Conservation Area and surrounding landscape highlighting natural environment and geology

4.3.2 This demonstrates that there is a weight of evidence to support these areas as making a particular contribution to the distinctiveness of Saltford.

4.4 The Mapping and Extent of the Setting Policy Area for Saltford

4.4.1 The methodology set out in the Setting of Settlements Placemaking Plan Evidence Base (2015) highlighted some of the limitations associated with mapping setting. Field assessment has also revealed issues with the extent of the Setting Policy Area for Saltford, which are not clearly explained by the supporting text. These issues are interrelated and are set out below:

1. The rising slopes of the Cotswold National Landscape are visually important in defining the setting and reinforcing sense of place associated with Saltford due to the intervisibility of these hills with the historic core. However, they are not included in the mapped area. The only part of the Cotswold National Landscape to be included in the mapped setting (Area 2) is the low-lying land between the river and disused railway. This land is not widely visible from the surrounding landscape but is regarded an important component of the landscape setting to the historic core of the settlement.
2. The lower lying slopes of the southern ridge immediately south of Manor Road are not included within the Setting Policy Area but no justification for this is given. The northern boundary of the Area 1 cuts across the contours and field

enclosure pattern. The rationale of this boundary is not clear. Arguably these lower slopes provide a landscape setting to Keynsham Manor which collectively with Manor Road contribute to sense of place of the southern fringes of the settlement, albeit less distinctive than the Avon Valley and historic core relationship associated with Area 2.

- 4.4.2 A fuller explanation justifying the extent of the mapped setting area and the reason why areas are excluded would provide greater clarity and robustness.

4.5 Land Outside of the Setting Policy Area (NE2A)

- 4.5.1 Land adjacent to the settlement but not included within the Setting Policy Area is located south of Manor Road, west of Grange Road, north of the A4 and north of the railway on the floodplain. Saltford Parish Council, in their submissions, set out aspects of these landscape which are especially valued (Figure 1 illustrates the main designations and features of interest within the landscape which surrounds Saltford). The Parish identified the following qualities:

- Rural and tranquil
- Views towards the slopes in the AONB
- Permissive footpaths and public rights of way providing health and wellbeing
- Views from local lanes
- Stidham Farm SSSI valued for its geology of gravel deposits
- Area of Archaeological Importance north of Avon Farm – Anglo Saxon burial site

- 4.5.2 Saltford Parish Council went on to identify the land south of Manor Road and west of Grange Road as suitable for inclusion within the Setting Policy Area for Saltford.

4.6 Review of Qualities South of Manor Road and West of Grange Road

- 4.6.1 Additional field assessment was therefore undertaken to consider if land south of Manor Farm and West of Grange Road had special qualities which contribute to the local distinctiveness of the settlement of Saltford. The following observations are made:

- Land to the south of Manor Road forms the lower slopes of the southern ridge and immediately abuts the settlement. In the west these slopes are open arable farmland while in the east they comprise smaller scale pasture enclosures.
- Manor Road has an established and historic character especially where it forms a green lane, but is also affected by adjacent modern housing.
- South of the Saltford C of E Primary School, the orientation of the Manor Road aligns with the distinct conical hill of Kelston Round Hill. These relatively close views contribute to sense of place.

- The farm buildings of Hill Farm south of the Manor Road contribute to the rural context and coupled with rising wooded slopes behind, also reinforce a rural context to the settlement.
- Land west of Grange Road includes the distinctive cluster of limestone buildings associated with Keynsham Manor which flank the narrow and winding Manor Road. Here there is a rural quality derived from vernacular buildings and the narrow lane, although intermittent traffic along the lane disrupts tranquillity.
- North of the Keynsham Manor, the stone wall which demarcated the former extent of parkland is evident, but other parkland characteristics are no longer present.
- To the west the urban edge of Saltford is not readily visible from the west due to topography which is orientated away from the settlement towards Keynsham and lacks distinction.
- There are permissive footpaths north of Keynsham Manor which afford some longer distance views to the rising land of the Cotswold National Landscape and the ridge to the south of the village.
- Closer to the A4 the landscape is affected by traffic noise and tranquillity is reduced.

4.6.2 This review has highlighted two areas where the combination of landscape features and characteristics give rise to a stronger sense of place which contributes to the settlement character of Saltford and its distinctiveness. These two areas include Keynsham Manor and land immediately south of Manor Road and west of Hill Farm. These areas are relatively small and discrete and do not encompass the whole of the area Saltford Parish Council is seeking to include within the mapped Setting Policy Areas. They are illustrated on Figure 2 as a hatched line with no outer boundary. This Figure also highlights the importance of built and natural landmarks, key views and historic winding lanes which collectively contribute to settlement distinctiveness.

4.6.3 Furthermore, Saltford Parish Council highlighted that the land west of Grange Road and south of Manor Road forms part of the setting to the Cotswolds National Landscape and helps retain a sense of separation between Saltford and Keynsham. Both are important and different functions of the landscape but should not be conflated with and used to justify the inclusion of land within the Setting Policy area as indicated at bullet 6, paragraph 1.6.2 above. Taking them in turn, land which falls within the setting of the National Landscape is addressed by NPPF para 182. Where change within the setting of a National Landscape is proposed it must conserve and enhance the special qualities of that designation. This is clearly different to land which makes a particular contribution to the distinctiveness of a settlement. In the case of landscape which separates settlements, if the landscape has no other distinguishing qualities which make a particular contribution to distinctiveness of the settlement and if the land in question falls within Green Belt, then the associated Green Belt policy tests address the importance of retaining separation between settlements.

4.6.4 Areas outside of the Setting Policy Area which express particular qualities noted above are relatively small and discrete and do not necessarily lend themselves to be easily included within a mapped setting policy area given their location and extent. This may

account for their lack of inclusion in the first instance. Nevertheless, their role in reinforcing sense of place and as locally valued assets should not be lost.

4.6 Conclusions

- 4.6.1 This analysis has enabled the four questions set out at paragraph 4.1.2 above to be answered as follows:

Is the extent of Saltford's setting robust in terms of the B&NES methodology?

- 4.6.2 The extent of the mapped setting for Saltford is broadly in accordance with the B&NES methodology. However, Section 2.0 of this report highlights a lack of transparency both in terms of the methodology, justification and mapping of the Setting Policy Area for Saltford. Nevertheless, the landscape qualities of the mapped Setting Policy Area for Saltford are supported by the evidence submitted by Saltford Parish, showing a degree of consensus between parties.

Does the additional land identified by the Parish of Saltford also meet the criteria to form part of the setting of Saltford?

- 4.6.3 This report has highlighted areas/features beyond the Setting Policy Area that exhibit distinctive characteristics which contribute to the distinctiveness of Saltford. However, they are discrete areas and are limited in extent. The majority of the additional areas put forward by the Parish Council are not considered to exhibit qualities which make a particular contribution to the setting of Saltford.

Is the additional land identified by the Parish of Saltford suitable for recognition as AGLV and if so on what grounds?

- 4.6.4 The areas identified during this review as exhibiting distinctive characteristic and qualities, are relatively small in extent. This report has highlighted the differences between defining a setting to a settlement and an AGLV and that the latter tends to define broader tracts of landscape. The additional areas identified by the Parish are not considered to exhibit qualities which distinguish them from more everyday landscape. Furthermore, land which forms a setting to the Cotswolds AONB or Green Belt should not be conflated with the justification for defining AGLV. For these reasons it is not considered appropriate for the additional areas put forward by the Parish to be defined as AGLV.

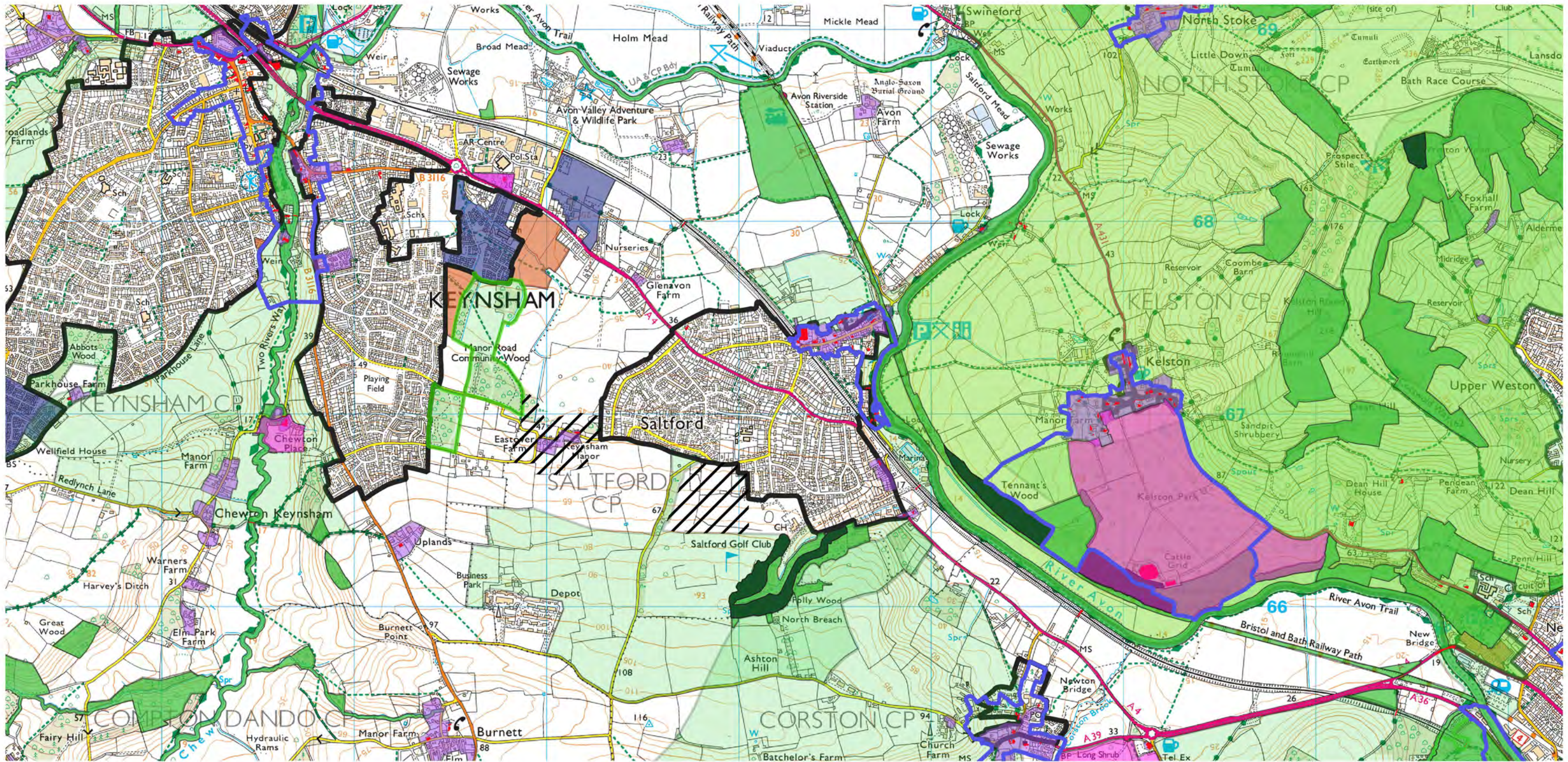
Should there be an additional policy which identifies valued landscape in addition to setting policy or is an understanding of value sufficiently articulated in existing landscape character assessment (LUC 2021)?

- 4.6.5 The landscape character assessment and its accompanying strategy sets out valued qualities in relation to broad landscape types. Nevertheless, these are not sufficiently fine grained to identified landscape features and places which are of local value. This report has highlighted in para 3.6.4 above that the Setting Policy Areas for settlements

can be regarded as a valued landscape in NPPF terms. It has concluded that a review of the Setting of Settlements study provides an opportunity to integrate new evidence from the landscape character assessment/strategy and integrate analysis of locally valued features and characteristics. Similarly, those Parishes undertaking Neighbourhood Plans also have the opportunity to highlight features and areas of local value. On this basis the identification of a further valued landscape such as AGLV is not considered necessary.

4.7 Recommendation

- 4.7.1 Based on the above analysis, it is recommended that the Setting of Settlements assessment is reviewed/updated to ensure its robustness into the future. This review should seek to integrate new data, improve transparency regarding factors influencing decisions and judgements, refine the mapped Setting Policy Areas, and provide a justification as to why areas are not included. The review/update could also seek to articulate features and characteristics which are valued locally, even though they may not ultimately be included within the mapped Settling Policy Area.
- 4.7.2 Should there be any further areas/features which local communities feel need recognition, then they should be encouraged to undertake the preparation of a neighbourhood plan through which recreational important landscapes, Local Green Space etc can be defined.



Key

	Cotswold National Landscape		Historic Park and Garden		Site of Nature Conservation Importance
	Housing Development Boundary		Conservation Area		Ancient Woodland
	Settlement Setting Policy Area NE2A		Historic Settlement/Core		Nature Reserve
	Strategic Allocated Site (Adopted Core Strategy)		Listed Buildings		
	Allocated Site (Local Plan Partial Update)				

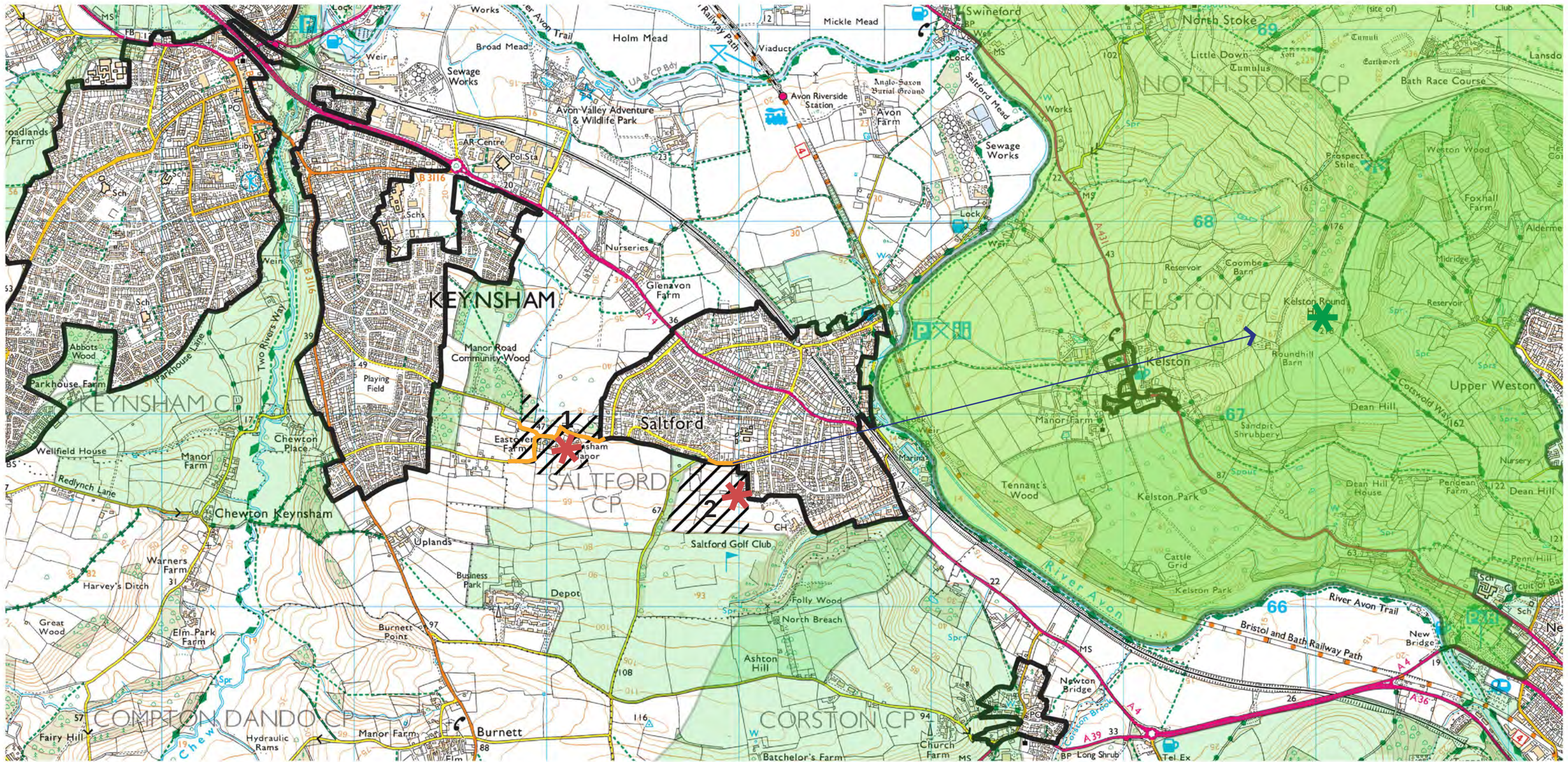
Review of Setting for Settlement of Saltford

Figure 1: Designations and Allocations



0m 500m 1km

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Key



Cotswold National Landscape



Housing Development Boundary



Settlement Setting Policy Area NE2A



Historic Buildings contributing to sense of place



Landscape Landmark



Historic Lanes contributing to sense of place



Key vista to landscape landmark



Locally Distinctive Areas

1. Keynsham Manor historic buildings, sinuous tree lined lane, stone walls and small enclosures
2. Manor Lane with vista to Kelston Round Hill, historic farm and small scale pastures creating green corridor into settlement at Saltford Primary School

Review of Setting for Settlement of Saltford

Figure 2: Analysis



0m 500m 1km

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