Local Plan allocations heritage impact assessments

Bath, West of Bath, Batheaston and Bathford Site

Bath & North East Somerset Council

Final report
Prepared by LUC
August 2026

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Chapter 1
Introduction

Context

1.1 Bath & North East Somerset Council (B&NES) is in the process of preparing a new Local Plan, following the decision to 'reset' the plan process in January 2025. This was as a consequence of government's proposed revisions to the National Planning Policy Framework (NPPF) and the standard method of assessing housing need figures. A new 'call for sites' process was held to suggest development locations for the Council to consider. It is these sites that this heritage impact assessment (HIA) process was commissioned to consider.

1.2 This report builds on the work undertaken by LUC in 2013, 2017 and 2024 for B&NES, examining the potential impacts of proposed land allocations in the vicinity of Whitchurch and Bath. As such, it follows the same broad methodology and approach for consistency.

Scope

1.3 This report forms part of a suite of HIA documents, covering the proposed allocations within the B&NES Local Plan. It covers the following sites, set out in **Table 1.1**:

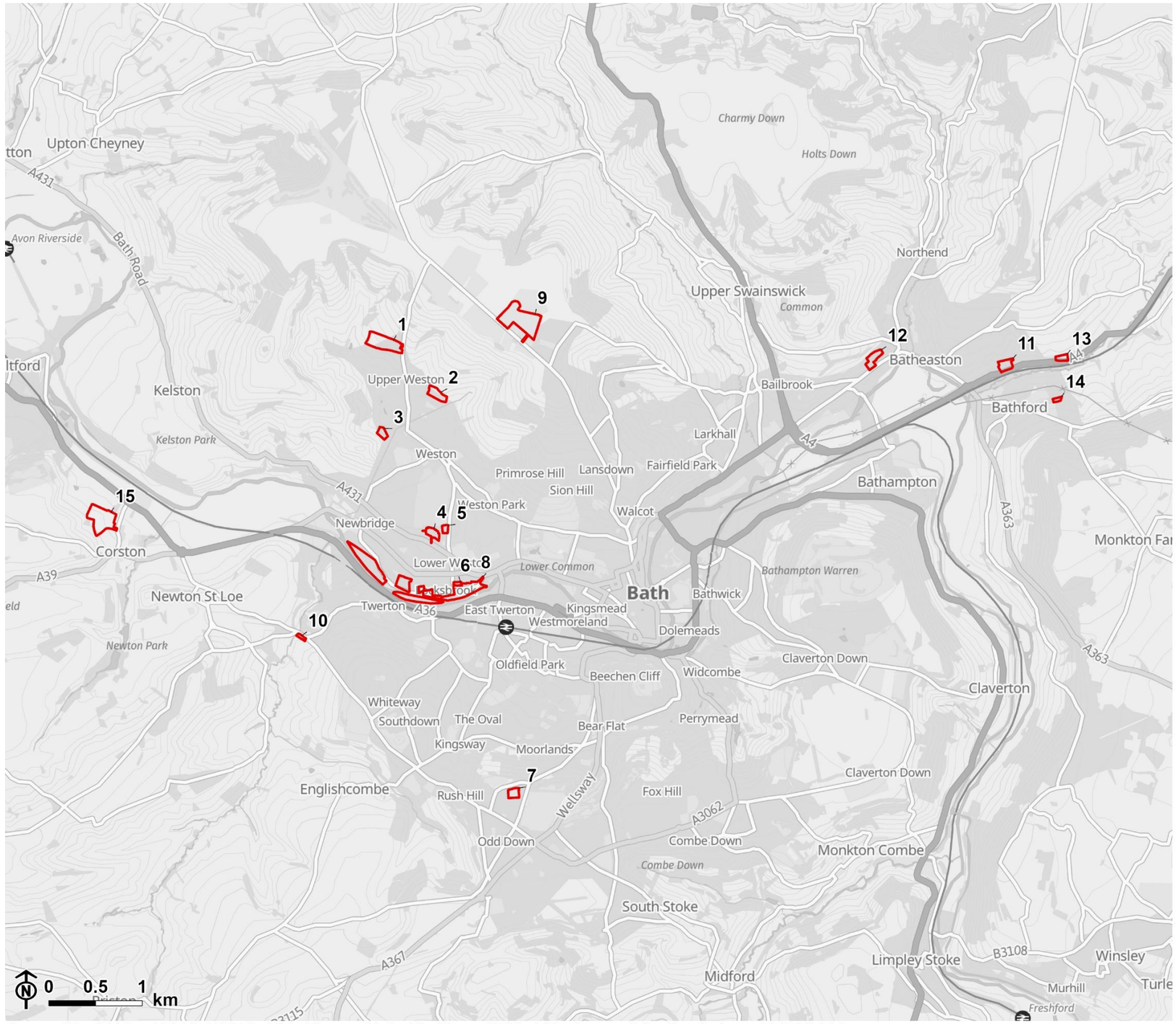
Table 1.1: Sites covered in this report

Group	Name
Bath (North-west)	North of Napier Road, Weston
Bath (North-west)	Bath Equestrian Centre
Bath (North-west)	Land adjacent to Westmead Gardens, Weston
Bath (urban)	NHS House, Combe Park
Bath (urban)	Car park adjacent to Combe Park
Bath (urban)	Land east of Station Road, Newbridge
Bath (urban)	Hampset Cricket Club
Bath (urban)	Production Quarter

Group	Name
Bath (urban)	Kingswood Playing Fields
Bath (urban)	Whiteway Road (Gypsy and Traveller site)
Batheaston and Bathford	Bathford Nurseries (South)
Batheaston and Bathford	Poplar Nursery, Batheaston
Batheaston and Bathford	Box Road
Batheaston and Bathford	Ashley Road
Corston 1	Corston 1

1.4 The Sites are shown on **Figure 1.1**.

Figure 1.1: Sites included in the assessment



Legend

Site boundary

1 - North of Napier Road, Weston
2 - Bath Equestrian Centre
3 - Land adjacent to Westmead Gardens, Weston
4 - NHS House, Combe Park
5 - Car park adjacent to Combe Park
6 - Land east of Station Road, Newbridge
7 - Hampset Cricket Club
8 - Production Quarter
9 - Kingswood Playing Fields
10 - Whiteway Road
11 - Bathford Nurseries (south)
12 - Poplar Nursery, Batheaston
13 - Box Road
14 - Ashley Road
15 - Corston Site 1

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Aim and objectives

1.5 The purpose of this study is to provide additional evidence for the Bath and North East Somerset Local Plan to help inform the potential allocation of land in and around Bath.

1.6 The study objectives were to:

- Undertake a review of the key documents providing context for the potential allocations.
- Identify heritage assets with the potential to be affected by the potential land allocation.
- Understand their significance, including any contribution made by setting.
- Assess the likely effect on heritage significance arising from development in relevant potential land allocations – including those arising from setting change and cumulative/in-combination effects.
- Provide commentary on the wider relationships between heritage assets and the historic landscapes of the area, including potential for effects as a consequence of development.
- Provide recommendations for opportunities to avoid, reduce and/or offset effects identified.

Legislation, policy and guidance

1.7 The assessment has regard for legislative requirements in relation to the historic environment and has been informed by national and local planning policy. It also takes account of established sector guidance on the assessment of significance of heritage assets and how to assess the impact of proposals on that significance.

Statutory Duties

1.8 Legislation relating to archaeology and scheduled monuments is contained in the Ancient Monuments and Archaeological Areas Act 1979, as amended. Under the terms of the Act the Secretary of State has a duty to compile and maintain a schedule of monuments of national importance. The purpose of the schedule is to help preserve these monuments, so far as possible, in the state in which they have come down to us today.

1.9 Legislation regarding buildings and areas of special architectural or historic interest is contained in the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended. The 1990 Act places a number of duties on decision makers. Key amongst these are:

- Section 66. This states that when considering planning applications that affect listed buildings, “special regard” will be had by the decision-maker “to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”;
- Section 69. This states that conservation areas are designated for their “special architectural or historic interest" which is "desirable to preserve or enhance"; and
- Section 72. This states that in considering applications that affect conservation areas, “special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area”.

1.10 In the operation of this law, the concept of ‘preservation’ referred to in Sections 66 and 72 has been interpreted as to do no harm.

National Planning Policy – current

1.11 National planning policy is laid out in the National Planning Policy Framework (NPPF) (revised December 2024).

1.12 Achieving sustainable development involves seeking positive improvements in the quality of the environment and, in the case of heritage assets, requiring local planning authorities to look for opportunities to enhance or better reveal their significance (para.206). It is also a fundamental part of Plan-making, as set out in Chapter 3 of the NPPF. Chapter 3 states that: "The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate…" and "should demonstrate how the plan has addressed relevant economic, social and environmental objectives […]. Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued." (paragraphs 31 and 32)

1.13 Paragraph 203 states that “Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

(d) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;

(e) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;

(f) the desirability of new development making a positive contribution to local character and distinctiveness; and

(g) opportunities to draw on the contribution made by the historic environment to the character of a place."

1.14 The purpose of this assessment is to address both the plan-making and historic environment chapters of the NPPF by providing a robust evidence base to inform the development of the local plan.

NPPF – December 2025 draft

1.15 While a range of changes have been proposed by government through the publication of a draft NPPF in December 2025, the provisions with regard to plan-making remain relatively consistent. Policy HE1 states:

1. To support the conservation, enhancement and enjoyment of the historic environment, development plans should, at the most appropriate level:

    a. Identify the main heritage features within the plan area, including those heritage assets at most risk through neglect, decay or other threats, set out the key issues facing them and create a positive strategy for their conservation and enhancement, including where these assets can be used to support sustainable growth;
    b. Be informed by a proportionate heritage assessment and should consider the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
    c. Take opportunities, for example through design codes and masterplans, to draw on the contribution which the historic environment can make to the character and quality of development;
    d. Be supported by a local list to identify non-designated heritage assets that are important to the local community.

1.16 However, for the purposes of impact assessment (the framework does not distinguish between strategic and site-specific assessments), the provisions with regard to 'less than substantial harm' for designated assets have been removed. Levels of effect are, therefore, presented on a standard rating scale, along with

providing a view on substantial/less than substantial harm for clarity against the current and emerging NPPF.

Sector Guidance

1.17 The methodology has been developed with reference to current guidance. This includes:

- Institute of Environmental Management and Assessment (IEMA), the institute of Historic Building Conservation (IHBC) and Chartered Institute for Archaeologists (CIfA) (2021) 'Principles of Cultural Heritage Impact Assessment in the UK' **[See reference 1]**
- Chartered Institute for Archaeologists (CIfA) (2014) 'Standards and guidance for desk-based assessment'.
- Historic England (2015) 'Historic Environment and site Allocations in Local Plans: Historic England Advice Note 3' (HEAN3) **[See reference 2]**
- Historic England (2017) 'The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3' (GPA3) **[See reference 3]**
- Historic England (2008) 'Conservation principles, policies and guidance for the sustainable management of the historic environment' **[See reference 4]**

Definitions

1.18 The following definitions are provided in Annex 2 of the NPPF:

- **Heritage Assets:** A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets include designated heritage assets and assets identified by the local planning authority (including local listing).
- **Archaeological Interest:** a heritage asset which holds or potentially could hold evidence of past human activity worthy of expert investigation at some point. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them.

- **Designated Heritage Assets:** world heritage site, scheduled monuments, listed buildings, protected wreck site, registered parks and gardens, registered battlefields and conservation areas.
- **Significance:** The value of a heritage asset to this and future generations because of its heritage interest. This interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.
- **Setting:** The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance, or may be neutral.

Reporting, Assumptions and Limitations

1.19 The findings and recommendations have been drawn together into this report. The following assumptions and limitations have been made during the process of this assessment.

1. This study only considers the effect that the development of the Site would have on the significance of individual heritage assets. It does not include assessments of impact on public and visual amenity, landscape character, or constitute a townscape and visual impact assessment; these are related but distinct disciplines, evidenced by the separate guidance document and methodology for such assessments, as set out by the Landscape Institute and IEMA (in partnership with Historic England) (2013) in Guidelines for Landscape and Visual Impact Assessment (3rd edition). The study has utilised a range of sources on the area's historic environment. Much of this is necessarily secondary information compiled from a variety of sources (e.g. Historic Environment Record (HER) data and Conservation Area documentation). It has been assumed that this information is reasonably accurate unless otherwise stated.

2. This report is intended to provide information on the historic environment impacts of the potential local plan land allocations. It provides professional judgements on likely effects to heritage assets in line with the cited guidance. The appraisal work has been undertaken by appropriately qualified and experienced staff.

3. As detailed proposals for the Site are not available, the study cannot draw conclusive statements regarding the significance of the potential impacts or definitive levels of harm. Detailed assessments would need to be undertaken as part of any subsequent planning applications and, if necessary, accompanying Environmental Impact Assessments (if the decision is taken to proceed with the allocation of these sites for development).

4. The assessment of potential effects was based upon a series of assumptions to provide a maximum case scenario, in line with the required precautionary approach. The assumptions applied to the assessment are set out in **Chapter 2: Methodology.**

5. Where suggestions for the avoidance, reduction or offsetting of harm have been provided, these should not be read as definitive. Development-specific impact assessments will be required, with mitigation measures reflecting the precise impacts identified at that stage. The suggestions in this report should not be assumed to confer acceptability of a specific development.

Chapter 2
Methodology

Introduction

2.1 This section outlines the methodology that was used in the study on a task-by-task basis. Key data sources are also identified. The tasks were as follows:

- Task 1: Review key documents;
- Task 2: Data collection;
- Task 3: Identification of affected assets and determination of significance;
- Task 4: Appraisal of the risk of harm;
- Task 5: Summary of risk for individual assets;
- Task 6: Cumulative risk of harm appraisal; and
- Task 7: Site visit and appraisal mitigation.

Task 1: Review key documents

2.2 In order to provide an updated and relevant assessment, and to bring it in line with current legislation and policy, a review of the previous documentation was undertaken. This included a review of the previous work undertaken for relevant site, the wider suite of local plan documents, and – where relevant – developer's masterplans and/or related information for relevant site.

Task 2: Data collection

2.3 Supporting data and information was collected and collated for the study area. Sources consulted comprise:

- GIS data for the proposed land allocations;
- Historic England (HE) designated heritage asset data;
- Bath and North East Somerset Historic Environment Record (B&NES HER) data;
- UNESCO World Heritage Site List and adopted management plans;

- Conservation Areas – GIS data and supporting documents (e.g. Conservation Area Appraisals);
- Modern Ordnance Survey (OS) 1:25,000 raster and MasterMap vector maps (provided by the client); and
- Light Detection and Ranging (LiDAR)-derived Digital Terrain Model (DTM) and Digital Surface Model (DSM).

Task 3: Identification of affected assets and determination of significance

2.4 The heritage assets susceptible to potential development of the Site has been undertaken using a standard study area applied to each allocation boundary. Any designated assets within the Site are assumed – unless otherwise stated – to be retained; any non-designated archaeological assets, conversely, are assumed to be lost. Assets in the vicinity of the Site with the potential to experience setting change have been identified using a 500m study area for low-rise (9-13m) development in urban areas, and 1km in more open rural and peri-urban areas. Where specifically stated, a zone of theoretical visibility model (ZTV), derived from Environment Agency LiDAR digital surface model (DSM) and digital terrain model (DTM) data has been employed to identify assets with theoretical intervisibility with the Site. In general, this has only been undertaken where a masterplan is in place for the Site to enable effective estimation of footprints, retained open space/landscaping, and building heights.

Ascribing significance

2.5 The value of heritage assets to present and future generations is measured by their heritage significance: the sum of their heritage values. Heritage assets can be important for many reasons and in different ways to different people. In this assessment, significance is articulated in accordance with Historic England's guidance document Conservation Principles (2008) **[See reference 5]** which identifies four principal heritage values which can be used to help explore and understand the multiple ways that a heritage asset can be considered important. The four key values are:

- **Evidential** - What does the study of the physical remains of a place reveal? What evidence does it hold of its past? What can it contribute to a greater understanding of our collective history?

- **Historical** - What is the story of the place? How can it connect past people and events to the present? What evidence survives that makes this place distinct from others?
- **Aesthetic** - How does the place stimulate the senses and mind? Is it inherently attractive, eye-catching, innovative or inspiring?
- **Communal** - What does the place mean to people now? How important is it to a community's collective identity? Is it a cherished resource?

Contribution of setting

2.6 In line with NPPF, the contribution that setting makes to an asset's significance has been considered. Setting is defined by the NPPF as the surroundings in which an asset is experienced. The contribution made by setting to an asset's heritage significance is set out discursively with reference to Historic England's (2017) setting guidance. This, and an understanding of the nature and likely interaction of future change with the contribution of setting to the asset's significance, has been used to determine susceptibility to change.

Importance

2.7 Heritage values help in understanding cultural significance of an asset, but do not determine the level of that significance, nor the level of legal or planning policy protection afforded to that asset. 'Importance' is a measure of the degree to which significance requires protection in decision-making.

2.8 Professional judgment has been employed alongside use of the designation criteria for assets of national significance and regional research agendas. Assets may derive their significance from one or more of the heritage values outlined above, but a lack of interest in one or more of these areas does not indicate a lower level of importance, just that their interest lies elsewhere.

2.9 Importance derives from a consideration of:

- how strongly are the identified heritage values demonstrated or represented by the place, compared with other places?
- how do its values relate to statutory designation criteria, and any existing statutory designations of the place? **[See reference** 6**]**
- levels of planning constraint imposed by legal or policy provisions.

Table 2.1: Levels of importance and their definitions

Level of importance	Definition
Outstanding	Usually, designated heritage assets of international significance: world heritage site. May be highly graded-listed buildings, scheduled monuments, highly-graded registered parks and gardens, registered battlefields, protected wrecks and conservation areas of demonstrably international significance or exceptional national significance. Assets such as this are often part of multiple, overlapping designations and of strong collective significance with other heritage assets.
High	Usually, designated heritage assets of national significance: scheduled monuments, Listed buildings, **[See reference 7]** registered parks and gardens, registered battlefields, and protected wrecks. Conservation areas, as a statutory designation, although individual examples may be more or less significant.
Medium	Locally listed buildings or locally listed parks and gardens, site of archaeological interest as noted on the HER, previously unidentified non-designated assets of demonstrably national and regional significance. Conservation areas of demonstrably lower significance.
Low	Usually non-designated heritage assets of local significance.
Uncertain	May be key features in a conservation area, buildings / areas / parks and gardens identified on the HER or historic maps, previously unidentified non-designated assets of demonstrably national or local significance.

Task 4: Appraisal of risk of harm

2.10 The risk of harm to the significance of heritage assets, should the Site be developed, was then appraised. This focused on effects to the significance of the asset in line with NPPF and considers:

- The significance and importance of the asset

- The likely level of harm of the potential development type, split into that arising from residential, other infrastructure (this category comprises uses such as a primary school or community centre) and green space.

2.11 For assets within the Site boundary, the level of harm relates to physical harm to the asset itself and harm to the significance of an asset related to setting change.

2.12 For assets outside of the Site boundary, the level of risk relates to potential harm to the significance of an asset via a change in its setting. Assessment of effects related to setting change follows the stages set out in HE guidance (GPA3).

2.13 A variation of a red/amber/green (RAG) rating system was used to give an initial assessment of the predicted level of harm that would be caused to the asset(s), should the Site be developed. This included extra categories in addition to the red, amber and green in order to be able to reflect a more nuanced approach to predicting harm from development across the Site.

2.14 The level of risk of harm is defined in **Table 2.2**. Professional judgement has been used to inform the final decision regarding the degree of harm.

Table 2.2: Definition of levels of risk of harm

Rating	Level of risk of harm to asset
Very high	An area of high importance and sensitivity, where development would have the greatest impact. The development of the Site is likely to be of such a scale that the significance of the heritage asset would experience significant harm, up to and potentially including 'substantial harm' for the purposes of the NPPF, with no potential for meaningful mitigation.
High	An area of high importance and sensitivity, where development would have a significant impact. Development of the Site is likely to result in a significant harmful impact on the significance of the heritage asset, but this could be reduced (but not removed) via appropriate mitigation.
High-medium	Area of medium-high importance and sensitivity where development would have a harmful impact if no mitigation occurred. Development of the Site could result in a harmful impact on the significance of the heritage asset but this impact is likely to fall within the definition of 'less than substantial harm', and/or could be reduced via appropriate mitigation (such as via landscape design solutions).
Medium	Area of medium importance and sensitivity. The development of the Site may result in a harmful impact to the significance of a heritage asset but it is likely

Rating	Level of risk of harm to asset
	that these impacts could be avoided via appropriate mitigation (such as via landscape design solutions).
Medium-low	Area of medium to low sensitivity. Potential impact will be of such a minimal scale that the significance of the heritage asset will not be harmed.
Low	Area of low sensitivity. development of the Site is likely to result in minimal impact on the significance of the asset. It is likely that no mitigation would be required.

Task 5: Summary of risk appraisal for individual assets

2.15 Building on the generalised risk appraisal, detailed appraisals for individual assets likely to experience effects was conducted to arrive at a view on likely levels of harm for the purposes of the NPPF, and an overall rating to capture the subtleties of changes to significance.

Assessing impact

2.16 Assessment of the impact to assets' heritage significance as a result of the development of each site has been undertaken using professional judgement and an understanding of how the heritage values of that asset that contribute to its heritage significance will be affected.

2.17 In accordance with step 3 of Historic England's (2015) HEAN 3 guidance for the selection of site allocations, the next stage of the assessment is to establish the sensitivity of that significance to change, and the risk of harm from the proposed change.

Sensitivity

2.18 An asset's sensitivity to change does not automatically equate to its level of significance but is dependent on where that significance lies and the type of proposed change. This is assessed using an understanding of the assets' significance, professional judgement and consideration of the potential interaction with the proposed development.

Table 2.3: Sensitivity to setting change rating criteria

Sensitivity to setting change	Criteria
High	The site makes a considerable contribution to the significance of the asset, and this contribution may be affected by the development of the site.
Medium	The site makes a moderate contribution to the significance of the asset, and this contribution may be affected by the development of the site.
Low	The site makes a marginal contribution to the significance of the asset, and this contribution may be affected by the development of the site.
None	The site does not contribute to the significance of the asset; or; The site contributes to the significance of the asset, but that contribution will not be affected by the development of the site.

Risk of harm

2.19 The risk of harm to each asset type or group resulting from the proposal was ascribed a level under the criteria given in Table 2.4. For the assessment, assets within the Site were assumed to experience physical impact/ total loss, automatically resulting in a high level of harm.

2.20 The risk of harm appraisal assumes a worst-case scenario approach resulting from the development of the Site.

Table 2.4: Levels of harm

Potential harm to asset	Criteria
High	The significance of the heritage asset would be lost or substantially harmed by the development.
Medium	The significance of the heritage asset would be harmed. The harm would fall within the less than substantial bracket but may be at a high to moderate level.

Potential harm to asset	Criteria
Low	The significance of the heritage asset would be harmed. The harm would fall within the less than substantial bracket but is likely to be to a low level.
None	The significance of the heritage asset would not be harmed.

Level of effect

2.21 The assessment took the potential harm to the asset and considered it against the asset's relative importance level. This established a proportionate level of effect on the historic environment overall. These levels of effect can be understood as being broadly comparable to the significance of effects for the purposes of the EIA Regulations. However, the assessment undertaken for this more strategic appraisal necessarily lacks the resolution available with a fixed, detailed design in place.

2.22 Significant effects are deemed to be those falling within the High and Medium-high levels. This means where substantial harm and the higher end of less-than-substantial harm occurs to assets of high or medium importance.

2.23 The assigned levels focus on the harm that an asset might experience. However, the descriptive assessment also identifies any beneficial changes where applicable.

2.24 The level of the effect has been determined using professional judgement to reflect the importance of the historic asset using the scaled criteria in Table 3.4 below. This approach accords with the guidelines for assessment set out in the PCHIA guidance (termed ‘weighting the effect’).

2.25 The final level of effect also considers embedded design mitigation which could be applied to each site as outlined in the masterplan, such as the location of sports pitches in the West Whitchurch Site and the use of lower storey buildings in some parts of the Sites.

Table 2.5: Level of effect criteria

Level of effect	Description
High	A large magnitude of change (e.g. major, total or near total loss) to the heritage significance of an asset of medium or high importance.
Medium	A medium magnitude of change (e.g. moderate loss or alteration) to the heritage significance of an asset of medium or high importance; or a large magnitude of change (total or near total loss) to an asset of low importance.
Low	A small magnitude of change (slight loss or alteration) to the heritage significance of an asset of medium or high importance; a medium or small (slight to substantial loss or alteration) to the heritage significance of an asset of low importance; or any change to a historic asset of very low importance.
Negligible	No change to the heritage significance of the asset.

2.26 These levels of effect can be understood as being broadly comparable to the significance of effects for the purposes of the EIA Regulations. However, the assessment undertaken for this more strategic appraisal necessarily lacks the resolution available with a fixed, detailed design in place.

Task 6: Cumulative risk appraisal

2.27 In addition to assessing the risk of potential effects to individual heritage assets, an assessment was also undertaken of the potential cumulative effect of proposed development on the local historic environment. This considers:

- Potential effect on group value of assets.
- Combined impact of individual effects from one proposed development on a particular asset.
- Effects from several developments which when considered together could give rise to significant cumulative effects.

2.28 The potential cumulative effects are reported using the same scale as **Table 2.1**. This judgement is based on professional opinion.

Task 7: Site visits and appraisal moderation

2.29 Initial impressions on likely potential risks on known archaeological remains, archaeological potential and effects related to the setting change were tested in the field. This included assessing how the development site can be viewed from key assets. It also included photography to illustrate any key points.

Chapter 3
City of Bath World Heritage Site

Baseline

Description

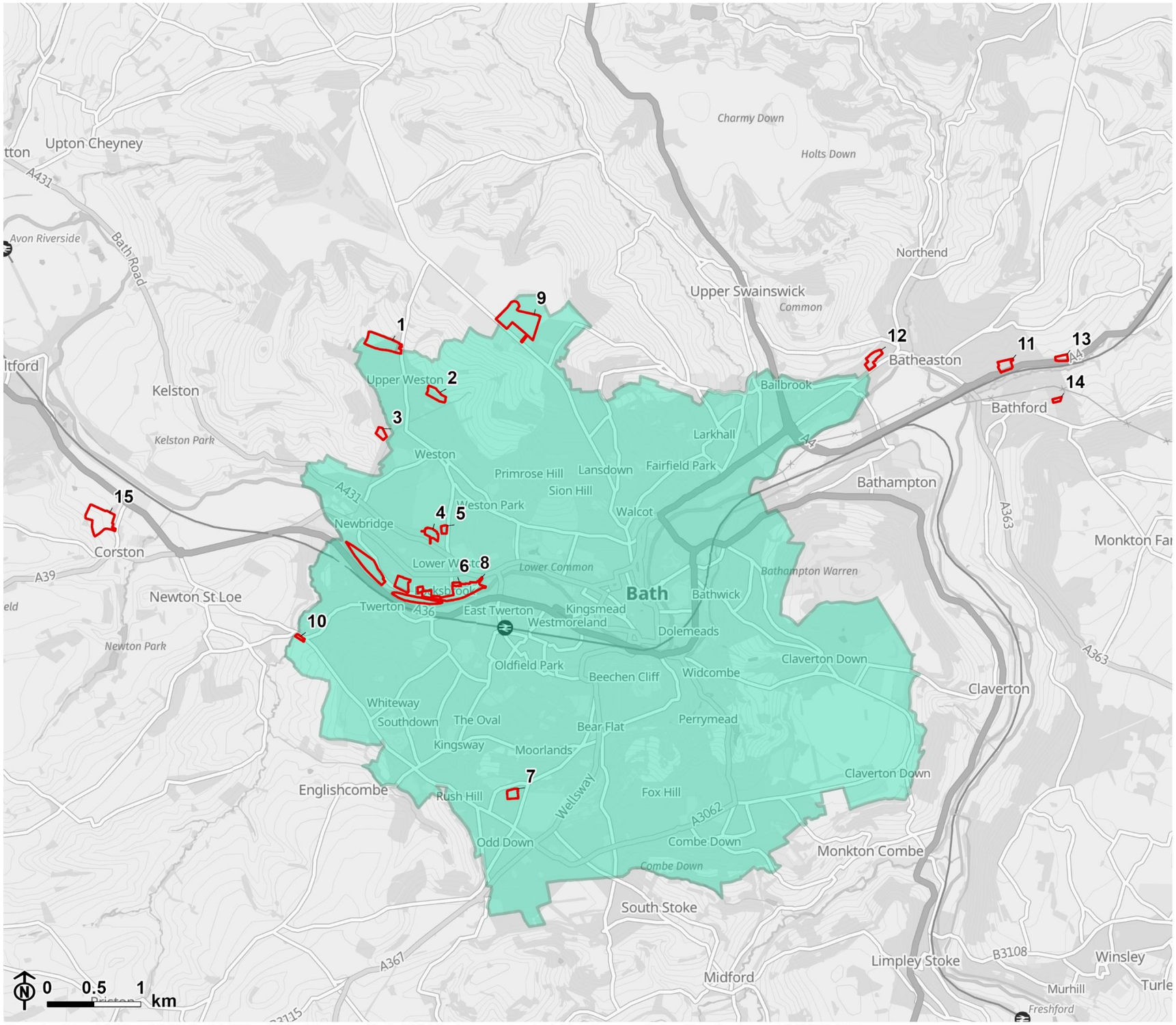
3.1 The asset is a world heritage site (WHS), inscribed on the UNESCO world heritage list. The City of Bath is exceptional in having two UNESCO inscriptions; in 1987 it was inscribed for its Hot Springs, Roman archaeology, Georgian buildings and natural landscape setting; and it was inscribed a second time in 2021 as one of the Great Spa Towns of Europe – fashionable spa towns laid out around natural springs which are used for health and wellbeing.

3.2 The WHS contains approximately 5000 listed buildings, representing one of the highest concentrations of Grade I and Grade II* listings outside of central London. **[See reference** 8**]** These listings include:

- The Royal Crescent: Grade I listed sweeping 500-foot-long crescent, consisting of 30 listed terraced houses overlooking Royal Victoria Park. Designed by John Wood the Younger and built between 1767 and 1774.
- The Circus: Grade I listed townhouses, considered a masterpiece of Georgian town planning. Designed by John Wood the Elder and completed by his son.
- The Roman Baths and Grand Pump Room: Grade I listed complex featuring significant Roman remains and the 18th-century Pump Room.
- Bath Abbey: Grade I listed medieval church located adjacent to the Roman Baths. It was the last great medieval church built in England.
- Pulteney Bridge: Grade I listed bridge, designed by Robert Adam and completed in 1774. Famous for being one of the few in the world to have shops built continuously across its full span.
- The Assembly Rooms: Grade I listed building built by John Wood the Younger in 1771.

3.3 The WHS context with the Sites is shown on **Figure 3.1**.

Figure 3.1: WHS in context



Legend

Site boundary

1 - North of Napier Road, Weston
2 - Bath Equestrian Centre
3 - Land adjacent to Westmead Gardens, Weston
4 - NHS House, Combe Park
5 - Car park adjacent to Combe Park
6 - Land east of Station Road, Newbridge
7 - Hampset Cricket Club
8 - Production Quarter
9 - Kingswood Playing Fields
10 - Whiteway Road
11 - Bathford Nurseries (south)
12 - Poplar Nursery, Batheaston
13 - Box Road
14 - Ashley Road
15 - Corston Site 1

Designated assets

World Heritage Site: Core Area

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Summary of Outstanding Universal Value

Inscription criteria

3.4 The asset is of **outstanding** importance. The property is inscribed on the World Heritage list under selection criteria i, ii and iv:

i. To represent a masterpiece of human creative genius.

ii. 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.

iv. 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.

3.5 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
- Georgian architecture reflecting 18th century social ambitions

3.6 Under these headings, The City of Bath World Heritage site Management Plan 2024-2030 identifies 53 sub-attributes that provide more detail on how the attribute is conveyed **[See reference 9]**.

Integrity

3.7 The Statement of OUV ('SOUV' 2013, quoted in Management Plan 2024-2030) outlines the integrity of the Site:

3.8 "Remains of the known Roman baths, the Temple of Sulis Minerva and the below grounds Roman archaeology are well preserved and within the property boundary as

are the areas of Georgian town planning and architecture, and large elements of the landscape within which the city is set. Despite some loss of Georgian buildings prior to inscription, the Georgian City remains largely intact both in terms of buildings and plan form. An extensive range of interlinked spaces formed by crescents, terraces and squares set in a harmonious relationship with the surrounding green landscape survive.

3.9 The relationship of the Georgian City to its setting of the surrounding hills remains clearly visible. As a modern city, Bath remains vulnerable to large-scale development and to transport pressures, both within the WHS and in its setting that could impact adversely on its garden city feel and on views across the property and to its green setting". **[See reference** 10**]**

3.10 The greatest threats to Bath's integrity are through unmanaged large scale urban development and encroaching tall buildings which would impact on historic sightlines both within the city and from its wider setting.

3.11 Although there are few threats to the principal buildings within the city, their integrity has been eroded by:

- Development and skyline changes
- Traffic and congestion
- Public Realm Decay

Authenticity

3.12 The 2013 Statement of OUV (SOUV) states, "The hot springs, which are the reason for the City's original development, are of undoubted authenticity. The key Roman remains are preserved, protected and displayed within a museum environment, and the Roman Baths can still be appreciated for their original use. The majority of the large stock of Georgian buildings have been continuously inhabited since their construction, and retain a high degree of original fabric. Repairs have largely been sympathetic, informed by an extensive body of documentation, and aided by a programme of restoration in the late twentieth century.

3.13 "More vulnerable is the overall interaction between groups of buildings in terraces, crescents and squares and views to the surrounding landscape that contributed to the city's visual harmony. There is a need for new developments to respect the planning of the Georgian terraces, to respect the scale and rhythm of its structures, and to contribute to picturesque views". **[See reference** 11**]**

3.14 The statement recognises that the city's relationship with the surrounding landscape remains legible despite changes to its context beyond the Georgian extent of the city. The statement suggests that the authenticity of the setting depends on the ability to understand the city's relationship with its historic context. Authenticity can therefore be affected by change in the setting which affects the understanding of its siting and historic relationship to the landscape. The attributes which convey this relationship are discussed below.

Attributes of Outstanding Universal Value

3.15 Attributes are aspects which are associated with or express the Outstanding Universal Value of a World Heritage property. The protection, conservation and management of the WHS is managed through the protection of these attributes.

3.16 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.

3.17 The contribution sites make to outstanding universal value of the WHS has been established by considering if and how the Site conveys each headline attribute. This has been done by looking at the receptors within the Site and how they relate to each sub-attribute. The identification of receptors was based on the maps provided in The City of Bath World Heritage site Setting SPD. The Setting SPD is not exhaustive, but it is extremely thorough. It highlights the key receptors for each attribute and this was deemed sufficient for the strategic purposes of this assessment to be able to carry out a robust assessment and gauge the potential impact on the attributes.

3.18 The more sub-attributes the Site has and the more strongly they conveyed, the greater the contribution of the Site to the OUV of the WHS.

3.19 The SOUV defines the attributes, which are expressed further in the 2024-2030 Management Plan and summarised below:

3.20 Roman archaeology. The key components contributing to this attribute of Bath's OUV include:

- 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, West Baths, and Gymnasium with the Roman Baths still capable of being used for their original function.

- 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
- 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
- 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

3.21 The hot springs. The key components contributing to this attribute of Bath's OUV include:

- 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.
- 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

3.22 Georgian town planning. The key components contributing to this attribute of Bath's OUV include:

- The introduction of innovative forms of town planning including squares, crescents and circus
- The deliberate creation of a beautiful city
- 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
- C18th picturesque principles including the relationship of buildings to landscape, the concept of blending countryside and town, and historic parks and gardens

3.23 Georgian architecture. The key components contributing to this attribute of Bath's OUV include:

- 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
- Key visual landmarks within views, such as the Royal Crescent and Beckford's Tower

3.24 The green setting of the city in a hollow in the hills. The key components contributing to this attribute of Bath's OUV include:

- The compact and sustainable form of the city contained within a hollow of the hills
- Green, undeveloped hillsides within and surrounding the city
- Trees, tree belts and woodlands predominantly on the skyline, lining the river and canal, and within parkland and gardens
- Open agricultural landscape around the city edges, in particular grazing and land uses which reflect those carried out in the Georgian period
- Fingers of green countryside which stretch right into the city

3.25 Georgian architecture reflecting 18th century social ambitions. The key components contributing to this attribute of Bath's OUV include:

- The patronage and vision of John Wood the Elder, 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
- 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

The Great Spa Towns of Europe World Heritage Site

Summary of Outstanding Universal Value

3.26 The asset is of **outstanding** importance. The property is inscribed on the World Heritage list under selection criteria ii and iii:

ii. 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;

iii. Bear a unique or at least exceptional testimony to a cultural tradition or to a civilization which is living or which has disappeared.

3.27 The management plan for The City of Bath WHS breaks down the OUV into component parts called attributes. It identifies seven headline attributes for the Great Spa Towns of Europe:

- Mineral Springs
- Spa Spatial ensemble
- Spa architecture
- Therapeutic Spa Landscape
- Spa Infrastructure
- Continuing spa function
- Internationalism

3.28 Under these headings, The City of Bath World Heritage site Management Plan 2024-2030 identifies 31 sub-attributes that provide more detail on how the attribute is conveyed **[See reference** 12**]**

Integrity

3.29 The Statement of OUV ('SOUV' 2013, quoted in Management Plan 2024-2030) outlines the integrity of the Site:

- 'The eleven component parts that comprise the serial property represent the most exceptional examples of European spa towns. All component parts share a set of determining characteristics formed during the most significant "culture creating" phase of their history and development, the heyday period from around 1700 to the 1930s. Each and every one continues to function for the purpose for which it was originally developed.
- The series illustrates the main stages of the development of the spa phenomenon, starting with the most influential spa towns in the 18th century, to the development of model spa towns in the 19th century, to towns that are testimony to the last stages of the phenomenon in the early 20th century.
- The greatest threat to the Great Spa Towns' integrity is through upgrades and redevelopments of the towns made to keep pace with new spa technologies and standards of service and hygiene. This can create tension with the conservation of the historic buildings, as can challenges in the adaptive reuse and technical upgrading of industrial structures.
- Climate change and urban development also pose threats to the integrity of the Great Spa Towns of Europe.

Authenticity

3.30 The 2013 Statement of OUV states, 'The property meets the conditions of authenticity in terms of form and design, materials and substance, use and function, traditions, and location and setting.

3.31 The veracity and credible expression of attributes embodied in structures that date from around 1700 to the 1930s, the principal period of contribution to Outstanding Universal Value, is further evidenced during substantial and sustained conservation works that are informed by expansive archival collections of plans, documents, publications and photographs held at each component part.

Attributes of Outstanding Universal Value

3.32 Attributes are aspects which are associated with or express the Outstanding Universal Value of a World Heritage property. The protection, conservation and management of the WHS is managed through the protection of these attributes.

3.33 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.

3.34 The contribution each Site makes to outstanding universal value of the WHS has been established by considering if and how the Site conveys each headline attribute. This has been done by looking at the receptors within the Site and how they relate to each sub-attribute. The identification of receptors was based on the maps provided in the Setting SPD. The Setting SPD is not exhaustive , but it is extremely thorough. It highlights the key receptors for each attribute and this was deemed sufficient for the strategic purposes of this assessment to be able to carry out a robust assessment and gauge the potential impact on the attributes.

3.35 The more sub-attributes the Site has and the more strongly they conveyed, the greater the contribution of the Site to the OUV of the WHS.

3.36 The SOUV defines the attributes, which are expressed further in the 2024-2030 Management Plan and summarised below:

3.37 Mineral Springs. The key components contributing to this attribute of Bath's OUV include:

- Number of working springs, and their characteristic spatial pattern (i.e. monocentric, linear, polycentric) and setting
- Continuous flow of hot water from antiquity to the present day

3.38 Spa spatial ensemble. The key components contributing to this attribute of Bath's OUV include:

- 18th Century landscape aesthetics including the relationship, orientation and layout of buildings to landscape and contours blending countryside and town.
- Views and vistas, within the Georgian city created by an awareness of context including elements such as Prior Park that was designed for the view and seen from the city centre

3.39 Spa architecture. The key components contributing to this attribute of Bath's OUV include:

- 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

3.40 Therapeutic spa landscape. The key components contributing to this attribute of Bath's OUV include:

- Green and undeveloped hillsides within and surrounding the city
- Trees, tree belts and woodlands predominantly on the skyline, lining the compact and sustainable form of the city contained within a hollow of the hills
- Fingers of green countryside which stretch right into the city
- Recreational paths and woodland walks, rides and drives

3.41 Spa infrastructure. The key components contributing to this attribute of Bath's OUV include:

- Condition of railway stations, key administrative buildings

3.42 Continuing spa function. The key components contributing to this attribute of Bath's OUV include:

- Traditional spa buildings and related features that remain in use
- Continued use of the therapeutic landscape for recreation and well being

3.43 Internationalism. The key components contributing to this attribute of Bath's OUV include:

- Places and specific buildings where significant progress in developing scientific principles of balneology, hydrotherapy, crenotherapy and other medical diagnostics were made (and other scientific social cultural achievements). Places which transformed society and which created transferable models of sociability

Contribution of setting to Outstanding Universal Value

3.44 Setting is the surroundings in which an asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. **[See reference** 13**]**

3.45 Historic England guidance on the setting of heritage assets (GPA3) notes that "Setting is not itself a heritage asset, nor a heritage designation… Its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance". **[See reference** 14**]**

3.46 The Management Plan describes the WHS's setting as follows:

- 'Beyond the boundary the landscape **setting** is largely attractive open countryside characterised by valleys, small woodlands and largely undeveloped high plateau grasslands, frequently called 'downs'. Bath remains a compact city standing alone in open countryside, without the urban sprawl associated with many modern similar settlements. Bath has no formal buffer zone in either the 1987 or 2021 inscriptions. Instead, an area of between approximately one and two miles beyond the boundary has been identified as an 'indicative setting'.' **[See reference** 15**]**
- GPA3 discusses the role of views and other factors in setting, quoting Planning Practice Guidance (PPG), "Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each. **[See reference** 16**]**"
- Visibility does not automatically cause an effect to OUV. New development would be of consequence if it changed the experience or appreciation of the WHS in a way which affected its attributes of OUV, its integrity or authenticity.
- The attributes **Georgian Town Planning and Green setting of the city in a hollow in the hills** are specifically noted to be expressed in the WHS

Management Plan through the Site's setting. Other attributes could also be affected by change in the setting. For example, location and setting are not specifically noted in the 2024 Management Plan for the following attributes, but contribute to OUV in the following ways:

- **Roman archaeology**: key components include the surrounding road system of the Roman city which influenced the form of the Georgian city, such as London Road;
- **Georgian architecture reflecting 18th century social ambitions**: key components include the importance of Bath as a place of resort, attracting visitors from a wide geographical area;
- **Therapeutic spa landscape**: key components are similar to those of the Green setting of the city in a hollow in the hills, including trees, tree belts and woodlands predominantly on the skyline, lining the compact and sustainable form of the city contained within a hollow of the hills;
- **Spa spatial ensemble**: key components include views and vistas, within the Georgian city created by an awareness of context including elements such as Prior Park that was designed for the view and seen from the city centre and the 18th Century landscape aesthetics including the relationship, orientation and layout of buildings to landscape and contours blending countryside and town.
- **Continuing spa function**: key components include the continued use of the therapeutic landscape for recreation and well being

3.47 Instances where impacts to OUV could occur through setting change are detailed in **Table 3.1.**

Impact Assessment

Susceptibility and sensitivity

3.48 Table 3.1 sets out the potential interactions with OUV and its Attributes which could be caused by development of the Site Allocations. This examines development principles in general, and the ability of different aspects of development (demolition, development, associated change, etc) to affect OUV through its attributes.

3.49 This finds that, in principle, the following impacts could affect the attributes of OUV:

3.50 Demolition within the Site Allocation would be able to affect OUV if it physically affects related assets or areas with a direct historical link to any of the attributes. This would be possible where the attribute explicitly has components which depend upon relationships with elements within site. This could apply to site that are both inside and outside the boundaries of the City of Bath.

3.51 Demolition also has potential to remove an existing element in the setting of the WHS which causes harm to OUV, or to open up views or visual relationships between the WHS and parts of its setting which were previously hidden.

3.52 Construction within the Site Allocation Zone would be able to affect OUV if it affects the experience or appreciation of any of the attributes, or the integrity or authenticity of any of those attributes of OUV. This could occur, for example, through interrupting or obscuring spatial or visual relationships between features contributing to OUV, interrupting or distracting from the sense of symmetry or formal composition of the Georgian town plan.

3.53 Occupation and use of the completed development is generally considered not able to affect OUV. The construction and permanent, physical presence of the development would create the effect to OUV. Proposed uses are likely to influence design, but to avoid double-counting effects, this aspect is considered to be included within the ‘construction’ categories. In addition, occupation of a building on completion of construction would not usually change or increase the effect, once in place.

3.54 Associated change, meaning the indirect effects of development such as increases in traffic, noise and activity, could in theory affect OUV by changing the ability to appreciate its attributes. However, this would be most likely to arise through very substantial development taking place very close to the WHS, resulting in acute change to activity levels surrounding it.

3.55 The WHS is considered to be of generally **moderate-high susceptibility** to setting change (i.e. the inherent vulnerability of the OUV to changes within its setting that could affect that OUV). A number of its attributes are potentially susceptible, particularly to development in its setting. This is because of the role that green, undeveloped and agricultural land play in OUV, and the likelihood that new development would arise in the backdrop or panoramas of the WHS. The level of effect would be highly variable depending on distance and location, and the presence and relationship of existing development.

Effects of proposed site development

3.56 Each individual site has been assessed against the set of potential interactions in **Table 3.1** to check its specific impacts. The detailed, narrative assessment and the effects arising from development are summarised in **Chapters 5-8.**

3.57 Where reference is made to the City of Bath WHS in the detailed assessment chapters, this encompasses the dual inscription for both the City and Spa Towns WHSs because they have the same boundary, and considers their dual attributes which are capable of being affected by development of the Site.

Table 3.1: Impact identification table - City of Bath and The Great Spa Towns of Europe WHS

World Heritage Site	Level of recognition	Conservation values	Attributes	Ability of development of allocation to cause effect to Attribute: Demolition	Ability of development of allocation to cause effect to Attribute: Construction	Ability of development of allocation to cause effect to Attribute: Change of Use	Ability of development of allocation to cause effect to Attribute: Occupation and use	Ability of development of allocation to cause effect to Attribute: Associated change – traffic, noise
The City of Bath	Outstanding Universal Value	Criteria i - Represent a masterpiece of human creative genius Criteria ii - 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 Criteria iv - Be directly or tangibly associated with events or living traditions, with ideas, or beliefs, with artistic and literary works of outstanding universal significance.	Roman Archaeology	Yes – if demolition removed an existing harmful element or revealed remains, a view or relationship which was currently hidden.	Yes – if development affects the experience or appreciation of: archaeological remains.	No – this action would not be able to affect any of the components of the attribute.	No – this action would not be able to affect any of the components of the attribute.	Yes – only if any change in activity would be to a level which could affect the experience and appreciation of the attribute.
			The Hot Springs	No – this action would not be able to affect any of the components of the attribute.	Yes – deep excavation, piling or boreholes in specified areas could affect the geothermal springs.	No – this action would not be able to affect any of the components of the attribute.	No – this action would not be able to affect any of the components of the attribute.	No – this action would not be able to affect any of the components of the attribute.
			Georgian Town Planning	Yes – if demolition physically affects related assets or areas with a direct historical link to the attribute (e.g. the River Avon). Yes – if demolition removed an existing harmful element or revealed a view or relationship which was currently hidden.	Yes – if development affects the experience or appreciation of the visual homogeneity of the city.	No – this action would not be able to affect any of the components of the attribute.	No – this action would not be able to affect any of the components of the attribute.	Yes – only if any change in activity would be to a level which could affect the experience and appreciation of the attribute.
			Georgian Architecture	Yes – if demolition physically affects related assets or areas with a direct historical link to the attribute (e.g. Key visual landmarks within views). Yes – if demolition removed an existing	Yes – if development affects the experience or appreciation of the Georgian Architecture of Bath	Yes – if development affects the experience or appreciation of the attribute	No – this action would not be able to affect any of the components of the attribute.	Yes – only if any change in activity would be to a level which could affect the experience and appreciation of the attribute.

World Heritage Site	Level of recognition	Conservation values	Attributes	Ability of development of allocation to cause effect to Attribute: Demolition	Ability of development of allocation to cause effect to Attribute: Construction	Ability of development of allocation to cause effect to Attribute: Change of Use	Ability of development of allocation to cause effect to Attribute: Occupation and use	Ability of development of allocation to cause effect to Attribute: Associated change – traffic, noise
				harmful element or revealed a view or relationship which was currently hidden.				
			The Green Setting of the City in a Hollow in the Hills	Yes – if demolition physically affects related assets or areas with a direct historical link to the attribute and all sub-attributes (e.g. green, undeveloped hillsides within and surrounding the city; fingers of green countryside which stretch right into the city; open agricultural landscape around the city edges, in particular grazing and land uses which reflect those carried out in the Georgian period.). Yes – if demolition removed an existing harmful element or revealed a view or relationship which was currently hidden.	Yes – if development affects the experience or appreciation of the green, undeveloped hillsides within and surrounding the city; fingers of green countryside which stretch right into the city; open agricultural landscape around the city edges, in particular grazing and land uses which reflect those carried out in the Georgian period).	Yes – if development effects the use of grazing land which reflects land uses carried out in the Georgian period	Yes – if development results in lighting changes within green/undeveloped areas of setting.	Yes - only if any change in activity would be to a level which could affect the experience and appreciation of the attribute.
			Georgian architecture reflecting 18th century social ambitions	Yes – if demolition physically affects related assets or areas with a direct historical link to the attribute, or could affect the appreciation of promenading routes/	Yes – if development affects the experience or appreciation of the Georgian Architecture of Bath.	No – this action would not be able to affect any of the components of the attribute.	No – this action would not be able to affect any of the components of the attribute.	Yes – only if any change in activity would be to a level which could affect the experience and appreciation of the attribute.

World Heritage Site	Level of recognition	Conservation values	Attributes	Ability of development of allocation to cause effect to Attribute: Demolition	Ability of development of allocation to cause effect to Attribute: Construction	Ability of development of allocation to cause effect to Attribute: Change of Use	Ability of development of allocation to cause effect to Attribute: Occupation and use	Ability of development of allocation to cause effect to Attribute: Associated change – traffic, noise
				connections/ views between social and gathering places.				
The Great Spa Towns of Europe Inscription (2021)	Outstanding Universal Value	Criteria ii - 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 Criteria iii – Bear a unique or at least exceptional testimony to a cultural tradition or to a civilization which is living or which has disappeared.	Mineral Springs	No – this action would not be able to affect any of the components of the attribute.	Yes – deep excavation, piling or boreholes in specified areas could affect the geothermal springs.	No – this action would not be able to affect any of the components of the attribute.	No – this action would not be able to affect any of the components of the attribute.	No – this action would not be able to affect any of the components of the attribute.
			Spa spatial ensemble	Yes – if demolition physically affects related assets or areas with a direct historical link to the attribute (e.g. views and vistas such as from Prior Park, designed to be seen from the city). Yes – if demolition removed an existing harmful element or revealed a view or relationship which was currently hidden.	Yes – if development affects the experience or appreciation of the therapeutic spa landscape or 18th century landscape aesthetics.	No – this action would not be able to affect any of the components of the attribute.	No – this action would not be able to affect any of the components of the attribute.	No – this action would not be able to affect any of the components of the attribute.
			Spa architecture	No – this action would not be able to affect any of the components of the attribute.	No – this action would not be able to affect any of the components of the attribute.	No – this action would not be able to affect any of the components of the attribute.	No – this action would not be able to affect any of the components of the attribute.	No – this action would not be able to affect any of the components of the attribute.
			Therapeutic spa landscape	Yes – if demolition physically affects related assets or areas with a direct historical link to the attribute and all sub-attributes (e.g. green, undeveloped hillsides within and surrounding the city; fingers of green	Yes – if development affects the experience or appreciation of the green, undeveloped hillsides within and surrounding the city; fingers of green countryside which stretch right into the city; open agricultural	Yes – if development effects the use of grazing land which reflects land uses carried out in the Georgian period	Yes – if development results in lighting changes within green/undeveloped areas of setting.	Yes - only if any change in activity would be to a level which could affect the experience and appreciation of the attribute.

World Heritage Site	Level of recognition	Conservation values	Attributes	Ability of development of allocation to cause effect to Attribute: Demolition	Ability of development of allocation to cause effect to Attribute: Construction	Ability of development of allocation to cause effect to Attribute: Change of Use	Ability of development of allocation to cause effect to Attribute: Occupation and use	Ability of development of allocation to cause effect to Attribute: Associated change – traffic, noise
				countryside which stretch right into the city; open agricultural landscape around the city edges, in particular grazing and land uses which reflect those carried out in the Georgian period.). Yes – if demolition removed an existing harmful element or revealed a view or relationship which was currently hidden.	landscape around the city edges, in particular grazing and land uses which reflect those carried out in the Georgian period).			
			Spa infrastructure	No – this action would not be able to affect any of the components of the attribute.	No – this action would not be able to affect any of the components of the attribute.	No – this action would not be able to affect any of the components of the attribute.	No – this action would not be able to affect any of the components of the attribute.	No – this action would not be able to affect any of the components of the attribute.
			Continuing spa function	Yes – if demolition physically affects related assets or areas with a direct historical link to the sub-attributes of continued use of the therapeutic landscape for recreation and well being. Yes – if demolition removed an existing harmful element or revealed a view or relationship which was currently hidden	Yes – if development affects the experience or appreciation of the therapeutic landscape.	Yes – if development effects the use of the therapeutic landscape for recreation and well being.	Yes – if development results in lighting changes within the therapeutic landscape	Yes - only if any change in activity would be to a level which could affect the experience and appreciation of the attribute.
			Internationalism	No – this action would not be able to affect	No – this action would not be able to affect	No – this action would not be able to affect	No – this action would not be able to affect	No – this action would not be able to affect

World Heritage Site	Level of recognition	Conservation values	Attributes	Ability of development of allocation to cause effect to Attribute: Demolition	Ability of development of allocation to cause effect to Attribute: Construction	Ability of development of allocation to cause effect to Attribute: Change of Use	Ability of development of allocation to cause effect to Attribute: Occupation and use	Ability of development of allocation to cause effect to Attribute: Associated change – traffic, noise
				any of the components of the attribute.	any of the components of the attribute.	any of the components of the attribute.	any of the components of the attribute.	any of the components of the attribute.

Chapter 4
Northwest Bath

North of Napier Road, Weston

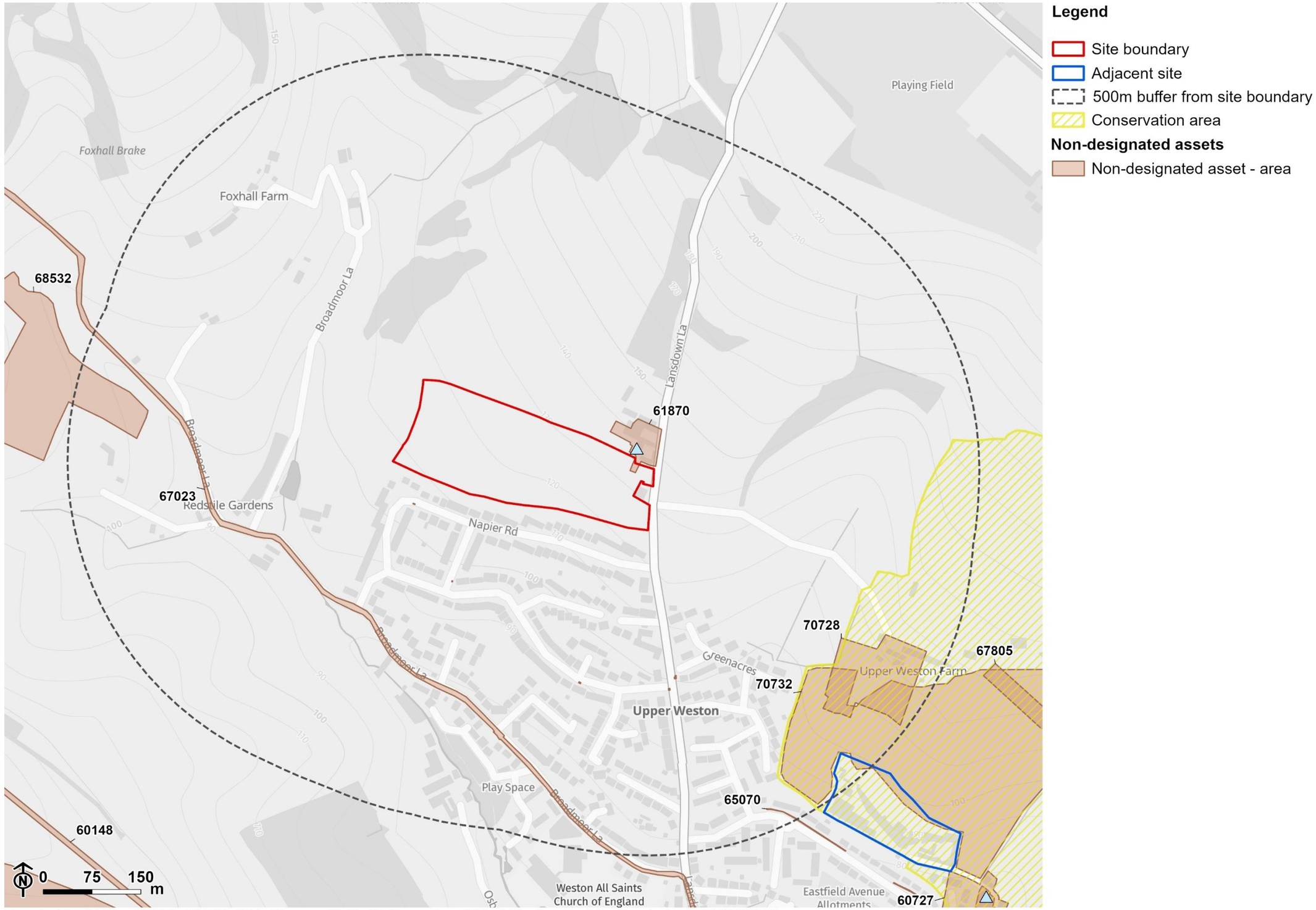
Site description

4.1 The Site is located north of Napier Road, south of Heather Farm lodge and west of Lansdown Lane. The landscape to the north and west of the Site largely consists of further agricultural fields.

4.2 The green, undeveloped farmland setting of the World Heritage Site (WHS) is a key part of its significance as the relationship of buildings within the WHS and the surrounding open space form a key part of its significance. The views to and from the WHS also form a key role. The Site location inside the WHS means it forms part of the 'important green hillsides' that contribute to the character of, and views from the city.

4.3 The Site, designated assets and non-designated assets are shown on **Figure 4.1.**

Figure 4.1: North of Napier Road, Weston



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Designated heritage assets within the Site

4.4 There is one designated heritage asset located within the Site:

- City of Bath World Heritage site

Interactions with WHS

4.5 The Site is located within the north-western area of the City of Bath WHS.

4.6 Historically the Site has formed part of the rural surroundings of the city of Bath, as part of the Weston Valley, which rises up to a plateau above. This area within the Site forms part of the rural surroundings of Bath and is also part of the Cotswold AONB. The rural surroundings of Bath contribute to its OUV as the city was intended to sit within the valley with the hills rising above it, with the green setting of the city in a hollow in the hills being one of the main attributes contributing to the OUV identified in the WHS Management Plan. Specifically of the elements identified as reflecting the OUV in the WHS management plan the Site contributes by forming part of the open agricultural landscape around the city edges, in particular grazing and land uses which reflect those carried out in the Georgian period.

4.7 The setting study for the WHS identified several viewpoints (such as from Prospect Stile, Twerton Round Hill, Little Solsbury Hill, Kelston View and Lansdown Cemetery) within the surrounding area overlooking the city and from which the Site can be seen. The setting study also identifies the area within the Site as one the "important green hillsides" which form a prominent part of the city's landscape setting and contributes to OUV.

4.8 Therefore, development within the Site has the potential to affect the OUV of the WHS. This would result in a **high** level of harm, and a **high** effect.

Non-designated heritage assets

4.9 There is one non-designated heritage asset recorded within the Site. This is identified in the table below:

Table 4.1: Non-Designated heritage asset summary table

Name	B&NES HER Ref	Description	Heritage Importance
Heather Farm, Lansdown Lane, Charlcombe	61870	A small portion of the area associated with Heather Farm extends into the Site. Historic mapping, including the 1903 Ordnance Survey map (1:10,560), shows that this area formerly contained a small outbuilding associated with the farmstead. The building is not depicted on more recent mapping and is absent from current satellite imagery, indicating that it has been demolished and is no longer extant.	Low

Archaeological potential

4.10 No previous archaeological investigations have been recorded within the Site. The nearest investigation was undertaken c.45m south of the Site and comprised an access pit excavated as part of the Bath Water Mains watching brief. The investigation did not identify or record any archaeological remains.

4.11 The Possible Roman Road, Bath to Sea Mills (via Bitton) (HER Ref. 67023) is located approximately c.210m south of the Site. This is possibly the Via Julia which linked Bath to the Roman port on the Avon, known as Abona, on the Sea Mills. The exact route of the road is unknown and it has been suggested the projected route along the modern A431 is more likely. No further Roman activity is recorded within 500m of the Site.

4.12 A medieval field system has been recorded c.330m east of the Site (HER Ref. 70732), likely associated with the Upper Weston Farm, Lansdown Lane, Weston (HER Ref. 70728). This suggests that the surrounding landscape has likely been in use as agricultural land since at least the medieval period.

4.13 Due to the proximity of the possible Roman road, the archaeological potential of the Site is considered to be **Moderate**.

Historic landscape character

4.14 The historic landscape character of the Site is recorded as late medieval enclosed open fields created by local arrangement and exchange, which is consistent with the wider field-system that likely derives its origins from an earlier open-field system.

Heritage assets with the potential to experience setting change

4.15 The following designated heritage assets have been identified as having the potential to experience effects to significance due to development within the Site as a result of changes to setting:

- Bath Conservation Area
- Barn attached to Heather Farmhouse (NHLE Ref. 1288606)

Bath Conservation Area

Summary

4.16 The Bath Conservation Area encompasses the historic city of Bath and reflects its exceptional architectural, archaeological, and landscape significance. Designated for its special historic and architectural interest, the Conservation Area includes the city's Roman origins, its medieval development, and its outstanding Georgian town planning and architecture, all set within a distinctive bowl-shaped landscape surrounded by wooded hillsides. The city is characterised by its extensive use of local golden Bath Stone, formal terraces, crescents, and squares, as well as an intricate network of streets, gardens, open spaces, and historic views that create a strong relationship between the built environment and its natural setting. The Conservation Area lies wholly within the UNESCO World Heritage site and forms a key component of Bath's Outstanding Universal Value, with important views both into and out of the city contributing significantly to its character and significance.

Table 4.2: Bath Conservation Area summary table

Importance	Type of change	Sensitivity	Risk of harm	Level of effect
High	Setting change	High	High	Medium

High	Setting change	High	High	Less than substantial harm

Significance

4.17 The significance of Bath Conservation Area is drawn from the following values:

- **Evidential value:** Bath Conservation Area derives its evidential value from both its exceptional archaeological resource and the survival of its historic built fabric. Beneath the modern city lies a remarkably well-preserved archaeological record spanning over two millennia, including internationally significant remains associated with the Roman baths, sacred thermal springs, temple complex, and wider settlement. These buried deposits provide invaluable evidence for understanding the development of Bath from the Roman period onwards. Above ground, the widespread use of locally quarried oolitic Bath Stone preserves a tangible record of the city's architectural evolution, craftsmanship, and construction techniques. The survival of buildings and structures from the medieval, Georgian, Victorian, and later periods enables the study of changing architectural styles, urban planning principles, and engineering practices, contributing substantially to our understanding of Bath's historic development and cultural significance.
- **Historical value:** The historical value of the Bath Conservation Area lies in its exceptional ability to illustrate the city's evolution from a Roman spa settlement into one of the most celebrated social, cultural, and therapeutic centres of the Georgian period. The historic townscape preserves the results of ambitious eighteenth-century urban planning, exemplified by internationally renowned developments such as the Circus, Royal Crescent, and Queen Square, which demonstrate innovative approaches to architectural design, speculative development, and the creation of a cohesive urban environment. The city's streets, buildings, and public spaces provide a tangible record of Bath's prominence as a fashionable destination for health, leisure, and society during the eighteenth and nineteenth centuries. The Conservation Area also retains strong associations with influential figures including Jane Austen, Beau Nash, and architects John Wood the Elder and John Wood the Younger, whose contributions helped shape Bath's distinctive character and enduring cultural significance.
- **Aesthetic value:** The aesthetic value of the Bath Conservation Area derives from the exceptional coherence of its historic townscape and its harmonious integration with the surrounding landscape. The city is renowned for the

consistent use of locally quarried Bath Stone, which creates a distinctive visual unity across its streets, terraces, crescents, and public spaces. This architectural composition is exemplified by the elegant Georgian town planning of the eighteenth century, including grand terraces, sweeping crescents, formal squares, and carefully designed streetscapes that reflect the principles of classical architecture. Equally important is Bath's dramatic topographical setting within a natural bowl of surrounding hills, which allows for extensive views both into and out of the city. The close relationship between the built environment and the green hillsides creates a series of memorable panoramas and townscape vistas, contributing to the city's unique sense of place and establishing the iconic visual character for which Bath is internationally recognised.

4.18 The importance of this asset is therefore **high**.

Contribution of setting

4.19 The main elements of the conservation area's setting which contribute to its significance include those which help better understand the historic development of the city of Bath. The city of Bath sits within a valley with green hills rising above it and this distinctive topography is one of the key characteristics which has influenced the development of Bath. Despite a large amount of expansion since the original Roman settlement core beside the River Avon, the settlement has retained a strong relationship with its surrounding landscape and the green hillsides surrounding the city are visible within numerous views from across the Bath Conservation Area. These views of the conservation area and its setting contribute strongly to its aesthetic value and would be considered key views.

4.20 Other key elements of the setting of the conservation area includes other historic associations which relate to key periods throughout the settlement's development, most notably those relating to the Roman and Georgian periods. These could include archaeological site such as Roman villas which provide an improvement understanding of the wider Roman landscape to which Bath belonged. Georgian site could include notable buildings, walks or rides which reflect an intention for the enjoyment of the natural landscape and appreciation of its picturesque qualities.

4.21 Key routes into and out of the city are also an important element of the asset's setting as they reflect the intended historic approach to the settlement. These routes include Roman roads, such as the Fosse Way, which were strategically important for the siting of the original settlement. They also include the later roads, with the main method for travelling to Bath during the Georgian period was by road and in most

cases provided visitors with their first glimpse of the city. Another key access route to the city of Bath was the Kennet and Avon Canal, which was possible from Bristol from 1727 and from London from 1810. The expansion of the canal is part of the Georgian town planning of Bath and therefore also contributes to the significance of the conservation area.

Contribution of the Site to asset's significance

4.22 The Site forms part of the rural surroundings of Bath and is located on one of the important green hillsides which frame the city and have been intentionally incorporated into its design.

4.23 It is visible in a number of long-distance views both from within and beyond the conservation area, where Bath is seen as a historic urban centre contained within the valley and framed by a backdrop of predominantly undeveloped green hillsides. This relationship between the city and its surrounding landscape is a fundamental component of Bath's historic character and was an intentional aspect of its development, particularly during the Georgian period. As such, the Site makes a positive contribution to the significance of the conservation area through its current undeveloped and agricultural character, forming part of the green setting that defines the city's distinctive visual identity.

Sensitivity to development of the Site

4.24 The sensitivity of Bath Conservation Area to the proposals is **high**.

4.25 The Site is in a sensitive location due to its location on one of the green hills which surrounds the city of Bath. As an undeveloped area of agricultural land it forms part of the asset's setting which contributes to its significance, making it sensitive to development.

Potential for harm to the asset

4.26 The Site's undeveloped, agricultural character contributes to the significance of the asset and the loss of this character as a result of development has the potential to result in harm to the asset. The Site is in a sensitive location due to its location on one of the green hillsides which surround the city. The risk of harm is also somewhat lowered by the existing modern development activity of Upper Weston immediately south of the Site, and it is likely any additional development would appears as an extension of this activity rather than a new element within the landscape. However,

due to the sensitivity of the location the potential for harm to the asset as a result of the proposals remains **high**.

Level of effect

4.27 The development of the Site would have a **medium** level of effect on the Bath Conservation Area, which would equate to **less than substantial harm** to the asset.

Barn attached to Heather Farmhouse (grade II listed, NHLE Ref. 1288606)

Summary

4.28 The Grade II listed barn attached to Heather Farmhouse comprises a 17th century barn dated to c.1688, but remodelled in c.19th century.

Table 4.3: Barn attached to Heather farmhouse summary table

Importance	Type of change	Sensitivity	Risk of harm	Level of effect
High	Setting change	High	Medium	Low
High	Setting change	High	Medium	Less than substantial harm

Significance

4.29 The significance of the Barn attached to Heather farmhouse is drawn from the following values:

- **Historical value:** The asset has historical (illustrative) value as an early 19th century farmhouse, demonstrating the use of the landscape during this time which was formerly agricultural land before the expansion of Bath.
- **Aesthetic value:** The significance of the listed building derives primarily from its architectural value as a good example of a c.19th century farmhouse with early 18th century origins.

4.30 The importance of this asset is therefore **high**.

Contribution of setting

4.31 Heather Farm is the part of the asset's setting which contributes most to its significance as it was this farm that the building was originally built to serve. The farm currently consists of the farmhouse and other outbuildings, although these are all of a later origin than the barn and the c.17th century farmhouse doesn't survive. Despite being of a later date, these elements have the closest functional relationship with the structure and its historic development since the mid 17th century.

4.32 Also contributing to the barn's significance to a slightly lesser degree is the farmland which surrounds it which formed part of the same farm. This agricultural land also has a direct functional relationship with the asset. The fields surrounding the asset currently separate the asset from the Weston area of the settlement of Bath. This separation from the settlement activity, especially to the south and east, allows for an understanding of the asset as a structure of agricultural function and therefore contributes to its significance.

Contribution of the Site to asset's significance

4.33 The Site is located immediately south of the asset.

4.34 Historically, the Site formed part of the asset's wider agricultural surroundings and due to its proximity, the Site likely formed part of the farmland associated with Heather Farm. Therefore the Site's current agricultural character does form part of the setting of the asset which contributes to its significance. This contribution is increased as the field containing the Site is the only remaining field separating the asset from the area of settlement at Weston to the south.

Sensitivity to development of the Site

4.35 The sensitivity of the barn attached to Heather Farmhouse to the proposals is **high**.

4.36 The asset is located adjacent to the Site and therefore is highly sensitive to development. This sensitivity is increased by the importance of the agricultural landscape to the significance of the asset, especially the fields to its south which separate the asset from the settlement activity at Weston.

Potential for harm to the asset

4.37 The agricultural landscape character of the area the Site forms an important part of the asset's setting. Due to the Site's proximity to the asset it is likely the Site formed part of the original landholdings for Heather Farm and therefore there is a direct relationship between the agricultural land within the Site and the asset. Should the Site be developed, the barn at Heather Farm would retain most of its surrounding fields. The potential for harm is increased as the development of this field would connect the farm to the existing settlement of Bath, which would significantly reduce the ability to understand the farm's original rural context and as such there is a **high-medium** potential for harm to the asset as a result of the proposals.

Level of effect

4.38 The development of the Site would have a **medium** level of effect on the barn attached to Heather Farmhouse , which would likely equate to **less than substantial harm** (towards the upper end of the scale) to the asset.

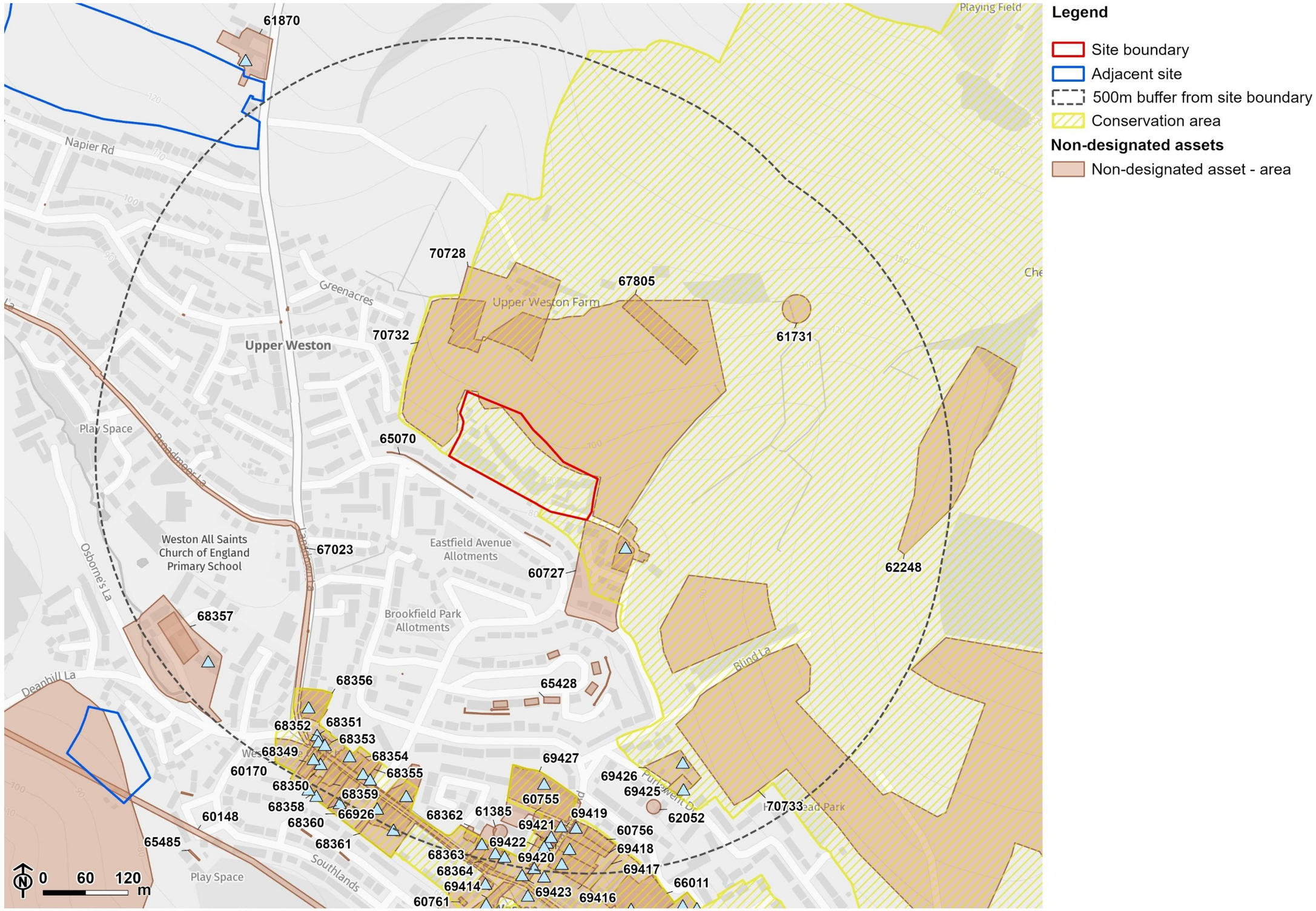
Bath Equestrian Centre

Site description

4.40 The Site is located immediately adjacent to the northern edge of the built-up area of Weston, Bath, and is accessed via Weston Farm Lane. It was formerly occupied by the Bath Equestrian Centre, which has now ceased operating, and a number of the associated buildings and facilities are no longer in active use.

4.41 The Site, designated assets and non-designated assets are shown on **Figure 4.2.**

Figure 4.2: Bath Equestrian Centre



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Designated heritage assets within the Site

4.42 There are two designated heritage assets located within the Site:

- City of Bath World Heritage site
- Bath Conservation Area

Interactions with WHS

4.43 The Site is located within the north-western area of the City of Bath WHS.

4.44 Historically the Site has formed part of the rural surroundings of Bath as part of the Weston Valley, which rises up to a plateau above. This area within the Site forms part of the rural surroundings of Bath and is also part of the Cotswold AONB. The rural surroundings of Bath contribute to its OUV as the city was intended to sit within the valley with the hills rising above it, with the green setting of the city in a hollow in the hills being one of the main attributes contributing to the OUV identified in the WHS Management Plan.

4.45 The setting study for the WHS identified several viewpoints within the surrounding area overlooking the city and from which the Site can be seen. The setting study also identifies the area within the Site as one the "important green hillsides" which form a prominent part of the city's landscape setting and contributes to the OUV. However, the presence of the equestrian centre within the Site reduces its contribution to these values as the centre buildings mean it no longer forms part of the picturesque rural hillside and therefore, while in a sensitive location, the Site is not currently contributing to the significance of the WHS. As the Site does not contribute to OUV, development within the Site would result in a **low** level of harm, and a **low** effect.

4.46 The ICOMOS review of the Site states "the area is already partially occupied by buildings of no architectural merit and, at present, has none of the characteristics that contribute to the OUV of the City of Bath World Heritage property" and therefore has capacity to support sensitive development. **[See reference** 17**]**

Bath Conservation Area

Summary

4.47 Bath Conservation Area was designated in 1968 as six separate areas then enlarged and combined as a single area in 1973. The designated area covers the current extent of the city of Bath as well as parts of the green landscape surrounding the city which were identified within the Bath City-Wide Character Appraisal (Bath and North East Somerset Planning Services 2005) as contributing "significantly to the setting and character of the city".

Table 4.4: Bath Conservation Area summary table

Importance	Type of change	Sensitivity	Risk of harm	Level of effect
High	Physical change	High	Low	Low
High	Physical change	High	Low	Less than substantial harm
High	Setting change	High	Medium	Low
High	Setting change	High	Medium	Less than substantial harm

Significance

4.48 The significance of Bath Conservation Area is drawn from the following values:

- **Evidential value:** Bath Conservation Area derives its evidential value from both its exceptional archaeological resource and the survival of its historic built fabric. Beneath the modern city lies a remarkably well-preserved archaeological record spanning over two millennia, including internationally significant remains associated with the Roman baths, sacred thermal springs, temple complex, and wider settlement. These buried deposits provide invaluable evidence for understanding the development of Bath from the Roman period onwards. Above ground, the widespread use of locally quarried oolitic Bath Stone preserves a

tangible record of the city's architectural evolution, craftsmanship, and construction techniques. The survival of buildings and structures from the medieval, Georgian, Victorian, and later periods enables the study of changing architectural styles, urban planning principles, and engineering practices, contributing substantially to our understanding of Bath's historic development and cultural significance.

- **Historical value:** The historical value of the Bath Conservation Area lies in its exceptional ability to illustrate the city's evolution from a Roman spa settlement into one of the most celebrated social, cultural, and therapeutic centres of the Georgian period. The historic townscape preserves the results of ambitious eighteenth-century urban planning, exemplified by internationally renowned developments such as the Circus, Royal Crescent, and Queen Square, which demonstrate innovative approaches to architectural design, speculative development, and the creation of a cohesive urban environment. The city's streets, buildings, and public spaces provide a tangible record of Bath's prominence as a fashionable destination for health, leisure, and society during the eighteenth and nineteenth centuries. The Conservation Area also retains strong associations with influential figures including Jane Austen, Beau Nash, and architects John Wood the Elder and John Wood the Younger, whose contributions helped shape Bath's distinctive character and enduring cultural significance.
- **Aesthetic value:** The aesthetic value of the Bath Conservation Area derives from the exceptional coherence of its historic townscape and its harmonious integration with the surrounding landscape. The city is renowned for the consistent use of locally quarried Bath Stone, which creates a distinctive visual unity across its streets, terraces, crescents, and public spaces. This architectural composition is exemplified by the elegant Georgian town planning of the eighteenth century, including grand terraces, sweeping crescents, formal squares, and carefully designed streetscapes that reflect the principles of classical architecture. Equally important is Bath's dramatic topographical setting within a natural bowl of surrounding hills, which allows for extensive views both into and out of the city. The close relationship between the built environment and the green hillsides creates a series of memorable panoramas and townscape vistas, contributing to the city's unique sense of place and establishing the iconic visual character for which Bath is internationally recognised.

4.49 The importance of this asset is therefore **high**.

Contribution of setting

4.50 The main elements of the conservation area's setting which contribute to its significance include those which help better understand the historic development of the city of Bath. The city of Bath sits within a valley with green hills rising above it and this distinctive topography is one of the key characteristics which has influenced the development of Bath. Despite a large amount of expansion since the original Roman settlement core beside the River Avon, the settlement has retained a strong relationship with its surrounding landscape and the green hillsides surrounding the city are visible within numerous views from across the Bath Conservation Area. These views of the conservation area and its setting contribute strongly to its aesthetic value and would be considered key views.

4.51 Other key elements of the setting of the conservation area includes other historic associations which relate to key periods throughout the settlement's development, most notably those relating to the Roman and Georgian periods. These could include archaeological site such as Roman villas which provide an improvement understanding of the wider Roman landscape to which Bath belonged. Georgian site could include notable buildings, walks or rides which reflect an intention for the enjoyment of the natural landscape and appreciation of its picturesque qualities.

4.52 Key routes into and out of the city are also an important element of the asset's setting as they reflect the intended historic approach to the settlement. These routes include Roman roads, such as the Fosse Way, which were strategically important for the siting of the original settlement. They also include the later roads, with the main method for travelling to Bath during the Georgian period was by road and in most cases provided visitors with their first glimpse of the city. Another key access route to the city of Bath was the Kennet and Avon Canal, which was possible from Bristol from 1727 and from London from 1810. The expansion of the canal is part of the Georgian town planning of Bath and therefore also contributes to the significance of the conservation area.

Contribution of the Site to asset’s significance

4.53 The Site lies within the north-western part of the Bath Conservation Area within the Weston, Weston Park, Sion Hill and Upper Lansdown character area.

4.54 The Site is located outside of the main historic core of the city of Bath and this part of the conservation area forms part of the agricultural surroundings of Weston, which was initially a separate village but due to the expansion of the city now forms part of Bath. Therefore this part of the conservation area within and surrounding

Weston has historical value both as being currently part of the city of Bath, demonstrating the historic development of the city, and through being a historic village in its own right of medieval origins.

4.55 The Site forms part of the agricultural hinterland which has surrounded the settlement activity at Weston since at least the medieval period. This is evidenced medieval field system which extends partially into the Site. The remains of this field system provides some contribution to the significance of the conservation area as it demonstrates the historic use and settlement pattern of the area. In addition, the undeveloped fields surrounding the Site also contribute to the aesthetic value of the city of Bath as part of the green setting of the city which was intentionally incorporated into its design.

4.56 The majority of the Site, however, is in use as the Equestrian Centre and this modern development activity does not contribute to the significance or special character of the conservation area. Therefore much of the Site, despite being within the conservation area boundaries, does not provide any contribution to the significance of the asset

4.57 Therefore, while the Site is in a sensitive location on the edge of the current settlement its current use means it does not form a key element of the conservation area's setting.

Sensitivity to development of the Site

4.58 The sensitivity of Bath Conservation Area to the proposals is **high**.

4.59 While the majority of the Site does not contribute to the significance of the asset due to its current use as an equestrian centre, its location within the designated area means it is highly sensitive to development.

Potential for harm to the asset

4.60 The Site forms part of the Bath Conservation Area, however the current use of the Site as an equestrian centre means it provides limited contribution to the special interest of the asset as it no longer forms part of the picturesque rural landscape which the city was designed to interact with.

4.61 The development of the Site would result in the loss of a small area of the medieval field system originally associated with Weston village. However, this loss would be minor, with the majority of the field system located within the fields to the north of the Site. It is likely this field system originally extended into the Site, however

the current use of the area as an equestrian centre has likely entirely removed any associated remains within the majority of the Site. Therefore, the potential for harm as a result of physical change to the asset is **low**.

4.62 While the Site does not currently form a key element of the asset's setting due to its use as an equestrian centre, it remains in a sensitive location due to its location within the designated area, on the edge of the surrounding rural landscape which does provide some contribution to the asset's significance. The development of the Site could result in some loss to the ability to experience and appreciate this surrounding rural landscape from areas within the conservation area. Therefore, the risk of harm as a result of development is **medium**. However appropriate and sensitive development plans could reduce this risk.

Level of effect

4.63 Physical effects to the asset as a result of the proposals would likely result in a **low** level of effect, which would likely equate to **less than substantial harm**.

4.64 Setting effects to the asset as a result of the proposals would likely result in a **low** level of effect, which would likely equate to **less than substantial harm**.

Non-designated heritage assets

4.65 There is one non-designated heritage asset recorded within the Site by B&NES HER. This is identified in the table below:

Table 4.5: Non-designated heritage assets within the Site

Name	B&NES HER Ref	Description	Heritage Importance
Medieval field system SE of Upper Weston Farm, Lansdown Lane, Weston	70732	The medieval field system, including evidence of strip lynchets, ridge and furrow cultivation, and former field boundaries. Only a small part of the recorded asset extends into the Site, and any surviving remains are likely to have	Low

Name	B&NES HER Ref	Description	Heritage Importance
		been affected by later ground disturbance associated with the former equestrian centre.	

Archaeological potential

4.66 No previous archaeological investigations have been recorded within the Site. The closest previous investigation was undertaken c.30m south-west of the Site and comprised an access pit excavated as part of the Bath Water Mains watching brief (HER Ref. 65070). The investigation did not identify any archaeological deposits or features. A geophysical survey was also conducted within a field c.250m north-east of the Site (HER Ref. 67805), this investigation also did not identify any potential archaeological remains.

4.67 The Possible Roman Road, Bath to Sea Mills (via Bitton) (HER Ref. 67023) is located approximately c.230m south of the Site. This is possibly the Via Julia which is known to have linked Bath to the Roman port on the Avon, known as Abona, on the Sea Mills. The exact route of the road is unknown and it has been suggested the projected route along the modern A431 is more likely. A Roman building and road, Brookfield Park, Weston, Bath (HER Ref. 61385) is recorded near the projected road route c.450m south of Site from stone wall/pottery sherds found in the early 20th century, but no remains of building or road found during later development. A possible building and bank was found near Purlewent Drive c.420m south-east of the Site, with suggestions that the bank may relate to the nearby possible Roman road, no further evidence has been provided to confirms its date/function (HER Ref. 62052).

4.68 The medieval settlement of Weston is recorded c.370m south of the Site (HER Ref. 60116). There is no evidence to suggest settlement activity extends into site. Most other evidence in the surrounding area supports this and comprises medieval or later agricultural features, such as field systems and lynchets (HER Refs. 70733; 70732; 62248) or medieval farms (HER Refs. 60727; 70728).

4.69 Due to the proximity of the possible Roman road, there is some potential for Roman activity to have extended into the Site. However, the equestrian centre currently occupying the Site his resulted in significant ground disturbance which has

likely truncated or removed any potential archaeological remains within its footprint. The archaeological potential of the Site is therefore considered to be **low**.

Historic landscape character

4.70 The historic landscape character of the Site is late medieval enclosed open fields created by local arrangement and exchange, which is consistent with the wider field-system that likely derives its origins from an earlier open-field system.

Heritage assets with the potential to experience setting change

4.71 The following designated heritage assets have been identified as having the potential to experience effects to significance due to development within the Site as a result of changes to setting:

- Weston Farmhouse (NHLE Ref. 1395354);
- 68 Listed Buildings comprising the village of Weston.

Weston Farmhouse (NHLE Ref. 1395354)

Summary

4.72 The Grade II listed Weston Farmhouse was mostly constructed c.1800, but with an early 18th century core. The three storey building is located on edge of the current settlement activity associated with the Weston area of Bath, with the surrounding agricultural landscape extending to its north and east.

Table 4.6: Weston Farmhouse summary table

Importance	Type of change	Sensitivity	Risk of harm	Level of effect
High	Setting change	Medium	Low	Low
High	Setting change	Medium	Low	Less than substantial harm

Significance

The significance of Weston Farmhouse is drawn from the following values:

- **Historical value:** The asset has historical (illustrative) value as an early 19th century farmhouse, demonstrating the use of the landscape during this time which was formerly agricultural land before the expansion of Bath.
- **Aesthetic value:** The significance of the listed building derives primarily from its architectural value as a good example of a c.19th century farmhouse with early 18th century origins.

4.73 The importance of this asset is therefore **high**.

Contribution of setting

4.74 The key element of the asset's setting which contribute its significance are its surviving associated outbuildings to its north-west and east. These limestone built structures are of the same materials used for the construction of the farmhouse and are visible on 19th century Ordnance Survey mapping as associated forming part of Weston Farm. While the use of these buildings appears to have changed to be residential dwelling their original function as agricultural outbuildings can still be understood from their architectural design and their proximity to the asset allows for an understanding of their relationship with the farmhouse.

4.75 Also of importance to the asset's significance is its agricultural surroundings, which have a historic functional relationship with the farmhouse as they formed part of the associated Weston Farm. Much of the asset's original rural setting has been lost due to the post-war expansion to Weston to the west and south of the asset. Therefore, the surrounding fields to the north and east of the asset provide a stronger contribution to its significance as they are important for the ability to understand its function as a former farmhouse.

Contribution of the Site to asset’s significance

4.76 The Site is located c.60m to the north-west of the asset.

4.77 Historically, the Site formed part of the asset's wider agricultural surroundings. Landowner and occupier records from the 1844 Weston parish tithe map does not indicate that the Site belonged to the landholdings of Weston Farm, being held under a different ownership and occupation to the farmhouse, with the associated fields largely extending to the east of the asset. As the Site does not appear to have a direct functional relationship with the asset its contribution to its significance is

reduced. Additionally, the Site no longer functions as an agricultural field and instead is largely occupied by the equestrian centre buildings and therefore does not contribute to the experience of the asset within a rural landscape. Therefore the Site in its current use does not form part of the asset's setting which contributes to the significance of the asset.

Sensitivity to development of the Site

4.78 The sensitivity of Bath Conservation Area to the proposals is **medium**.

4.79 While the majority of the Site does not contribute to the significance of the asset due to its current use as an equestrian centre, its location within close proximity to the asset means it is sensitive to development.

Potential for harm to the asset

4.80 The agricultural landscape within the Site has already been lost due to the equestrian centre development currently occupying the land. Therefore, the Site does not currently form part of the asset's setting which would allow for the understanding, appreciation or experience of the asset as a former farmhouse.

4.81 The risk of harm as a result of development is therefore **low**.

Level of effect

4.82 The development of the Site would have a **low** level of effect on Weston Farmhouse, which would likely equate to **less than substantial harm** to the asset.

Listed buildings comprising the village of Weston

Summary

4.83 The settlement of Weston contains 68 listed buildings, mostly located along the roads of High Street, Crownhill and Church Road. These buildings indicate the historic core of the medieval settlement of Weston, which formed a separate village prior to becoming part of the city of Bath. These buildings comprise three Grade II* listed buildings (Thomas Warr Attwood Tomb in Church of All Saints Churchyard, 1394661; General Joseph Smith Tomb in Church of All Saints Churchyard, 1396358; Rear-Admiral Philip Affleck Tomb in Church of All Saints Churchyard, 1396362), with

the remaining 65 buildings Grade II listed and mostly comprising residential dwellings.

Table 4.7: Listed buildings in Weston summary table

Importance	Type of change	Sensitivity	Risk of harm	Level of effect
High	Setting change	Low	Low	Low
High	Setting change	Low	Low	Less than substantial harm

Significance

The significance of the listed buildings in Weston is drawn from the following values:

- **Historical value:** The asset has historical (illustrative) value as representing the former settlement of Weston and its development.
- **Aesthetic value:** The significance of the listed buildings derives primarily from their architectural value as good examples of c.19th century or earlier structures.

4.84 The importance of these assets is therefore **high**.

Contribution of setting

4.85 The element of the setting of these assets which contributes most to their significance is their location within the former village of Weston. These assets have a group value as a representation of the previously separate historic settlement of Weston, with the former street pattern and historic character of the village still appreciable on the High Street, along which most of these structures are located. The wider setting of these assets provides limited contribution to their significance beyond providing general context to the historic development of the settlement of Weston to which they belong.

Contribution of the Site to asset's significance

4.86 The Site is located c.430m to the north of the assets.

4.87 The Site does not form part of the village of Weston, instead historically being part of the agricultural surroundings of the village. Additionally, a large amount of intervening post-war residential dwellings currently separates the Site from the historic buildings meaning there is limited intervisibility between the assets and the Site. The Site does not currently allow for any experience of the assets and does not allow for an understanding or appreciation of their historical or architectural value. Therefore the Site does not currently form any element of the setting of these assets which would contribute to their significance.

Sensitivity to development of the Site

4.88 The sensitivity of the listed buildings within Weston to the proposals is **low**.

4.89 The Site forms part of the wider setting of the assets but does not currently contribute to the significance of these assets due to the intervening distance and post-war development separating the assets and the Site.

Potential for harm to the assets

4.90 The Site does not currently form part of the assets' setting which would allow for the understanding, appreciation or experience of them, individually or as part of a historic settlement.

4.91 The risk of harm as a result of development is therefore **low**.

Level of effect

4.92 The development of the Site would have a **low** level of effect on the listed buildings in Weston, which would likely equate to **no harm** to the assets.

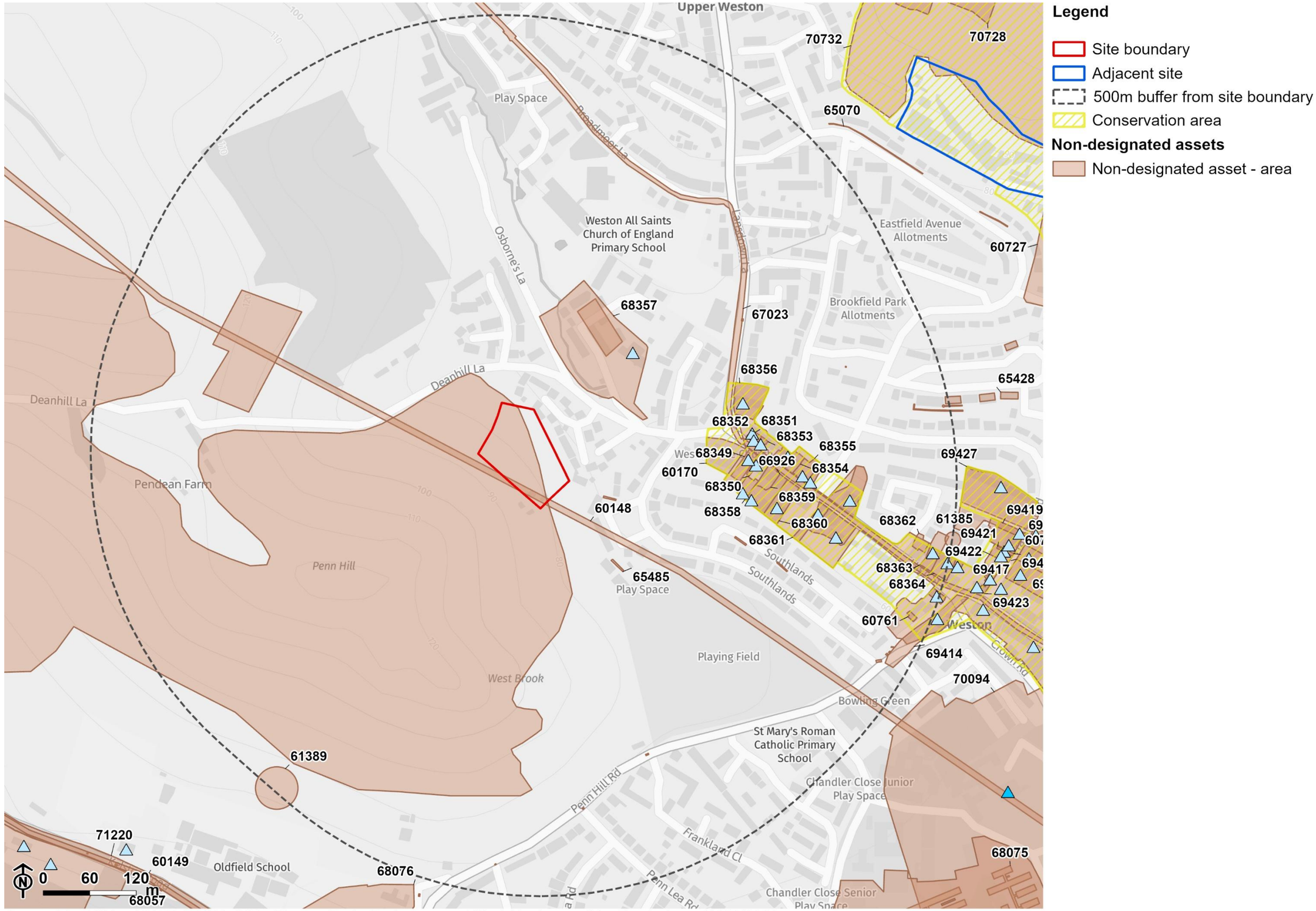
Land adjacent to Westmead Gardens, Weston

Site description

4.93 The Site is located south of Westmead Gardens and is accessed via the Westmead Gardens and Deanhill Lane. It is an undeveloped agricultural pasture with gently sloping land that has some agricultural buildings in the southeast corner. The Site serves as an agricultural buffer between the residential boundary of Westmead Gardens and the open countryside of the Cotswolds.

4.94 The Site, designated assets and non-designated assets are shown on **Figure 4.3.**

Figure 4.3: Land adjacent to Westmead Gardens, Weston



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Designated heritage assets within the Site

4.95 There are no designated assets within the Site.

Interactions with WHS

4.96 The Site is not located within the City of Bath WHS, although it does lie within its setting.

Non-designated heritage assets

4.97 There are two heritage assets that have been identified within the Site:

Table 4.8: Non-designated heritage assets within the Site

Name	B&NES HER Ref.	Description	Heritage Importance
Possible Route of the Via Julia Roman Road, Bath to Bitton	60148	The Via Julia linked Bath to the Roman port on the Avon, known as Abona, on the Sea Mills. The route is unknown and it has been suggested the projected route along the modern A431 is more likely	Medium
Medieval Field System and Lynchets, Dean Hill and Pen Hill, Kelston	66416	Earthworks within these field were first identified in 1881 and originally thought to possibly be a hillfort but subsequent visits by Ordnance Survey confirmed they are medieval strip lynchets	Low

Archaeological potential

4.98 No previous archaeological investigations have been recorded within the Site. The nearest investigation was undertaken approximately 60m east of the Site and

comprised a watching brief as part of the Archaeological evaluation and watching brief (2011), Southlands, Weston, Bath. The investigation recorded post-medieval/modern agricultural features.

4.99 A second possible Roman road has been identified c.220m to the east of the Site running from Bath to Sea Mills (HER Ref. 67023). The exact route of the road to the port at Sea Mills is unknown and while this alignment presents a possible route it is thought more likely that the Roman road followed the existing A431. A Roman building and road, Brookfield Park, Weston, Bath is recorded near the projected road route c.490m east of site from stone wall and pottery sherds found in the early 20th century, but no remains of building or road found during the construction of the later development (HER Ref. 61385).

4.100 The medieval settlement of Weston is located c.200m north-east of the Site (HER Ref. 60116). There is no evidence to suggest this settlement activity extends into Site. This is supported by the presence of medieval agricultural features within the Site indicating it was not part of the medieval settlement activity.

4.101 Due to the presence of a possible Roman road running through the Site the potential for further previously unrecorded archaeological remains is **moderate**.

Historic landscape character

4.102 The historic landscape character of the Site is defined as Late Medieval Enclosure of Steep-Sided Cultivation, reflecting the historic subdivision and agricultural management of the hillside landscape. This character type is consistent with the wider surrounding field pattern, which is considered to have originated from an earlier open-field system and retains evidence of the area's long-established agricultural use and development.

Heritage assets with the potential to experience setting change

The following designated heritage assets have been identified as having the potential to experience effects to significance due to development within the Site as a result of changes to setting:

- Bath Conservation Area
- Listed Buildings in Weston

Bath Conservation Area

Summary

4.103 Bath Conservation Area was designated in 1968 as six separate areas then enlarged and combined as a single area in 1973. The designated area covers the current extent of the city of Bath as well as parts of the green landscape surrounding the city which were identified within the Bath City-Wide Character Appraisal (Bath and North East Somerset Planning Services 2005) as contributing "significantly to the setting and character of the city".

Table 4.9: Bath Conservation Area summary table

Importance	Type of change	Sensitivity	Risk of harm	Level of effect
High	Setting change	High	High	Medium
High	Setting change	High	High	Less than substantial harm

Significance

4.104 The significance of Bath Conservation Area is drawn from the following values:

- **Evidential value:** Bath Conservation Area derives its evidential value from both its exceptional archaeological resource and the survival of its historic built fabric. Beneath the modern city lies a remarkably well-preserved archaeological record spanning over two millennia, including internationally significant remains associated with the Roman baths, sacred thermal springs, temple complex, and wider settlement. These buried deposits provide invaluable evidence for understanding the development of Bath from the Roman period onwards. Above ground, the widespread use of locally quarried oolitic Bath Stone preserves a tangible record of the city's architectural evolution, craftsmanship, and construction techniques. The survival of buildings and structures from the medieval, Georgian, Victorian, and later periods enables the study of changing architectural styles, urban planning principles, and engineering practices,

contributing substantially to our understanding of Bath's historic development and cultural significance.

- **Historical value:** The historical value of the Bath Conservation Area lies in its exceptional ability to illustrate the city's evolution from a Roman spa settlement into one of the most celebrated social, cultural, and therapeutic centres of the Georgian period. The historic townscape preserves the results of ambitious eighteenth-century urban planning, exemplified by internationally renowned developments such as the Circus, Royal Crescent, and Queen Square, which demonstrate innovative approaches to architectural design, speculative development, and the creation of a cohesive urban environment. The city's streets, buildings, and public spaces provide a tangible record of Bath's prominence as a fashionable destination for health, leisure, and society during the eighteenth and nineteenth centuries. The Conservation Area also retains strong associations with influential figures including Jane Austen, Beau Nash, and architects John Wood the Elder and John Wood the Younger, whose contributions helped shape Bath's distinctive character and enduring cultural significance.
- **Aesthetic value:** The aesthetic value of the Bath Conservation Area derives from the exceptional coherence of its historic townscape and its harmonious integration with the surrounding landscape. The city is renowned for the consistent use of locally quarried Bath Stone, which creates a distinctive visual unity across its streets, terraces, crescents, and public spaces. This architectural composition is exemplified by the elegant Georgian town planning of the eighteenth century, including grand terraces, sweeping crescents, formal squares, and carefully designed streetscapes that reflect the principles of classical architecture. Equally important is Bath's dramatic topographical setting within a natural bowl of surrounding hills, which allows for extensive views both into and out of the city. The close relationship between the built environment and the green hillsides creates a series of memorable panoramas and townscape vistas, contributing to the city's unique sense of place and establishing the iconic visual character for which Bath is internationally recognised

4.105 The importance of this asset is therefore **high**.

Contribution of setting

4.106 The main elements of the conservation area's setting which contribute to its significance include those which help better understand the historic development of the city of Bath. The city of Bath sits within a valley with green hills rising above it and

this distinctive topography is one of the key characteristics which has influenced the development of Bath. Despite a large amount of expansion since the original Roman settlement core beside the River Avon, the settlement has retained a strong relationship with its surrounding landscape and the green hillsides surrounding the city are visible within numerous views from across the Bath Conservation Area. These views of the conservation area and its setting contribute strongly to its aesthetic value and would be considered key views.

4.107 Other key elements of the setting of the conservation area includes other historic associations which relate to key periods throughout the settlement's development, most notably those relating to the Roman and Georgian periods. These could include archaeological site such as Roman villas which provide an improvement understanding of the wider Roman landscape to which Bath belonged. Georgian site could include notable buildings, walks or rides which reflect an intention for the enjoyment of the natural landscape and appreciation of its picturesque qualities.

4.108 Key routes into and out of the city are also an important element of the asset's setting as they reflect the intended historic approach to the settlement. These routes include Roman roads, such as the Fosse Way, which were strategically important for the siting of the original settlement. They also include the later roads, with the main method for travelling to Bath during the Georgian period was by road and in most cases provided visitors with their first glimpse of the city. Another key access route to the city of Bath was the Kennet and Avon Canal, which was possible from Bristol from 1727 and from London from 1810. The expansion of the canal is part of the Georgian town planning of Bath and therefore also contributes to the significance of the conservation area.

Contribution of the Site to asset’s significance

4.109 The Site forms part of the rural surroundings of Bath and is located on one of the important green hillsides which frame the city and have been intentionally incorporated into its design. However the Site is at the lower point of the hillside and the higher slopes rising to the west towards Penn Hill and north-west towards Dean Hill/Kelston Round Hill are likely more visible within long distance views of the city and provide a greater contribution to the significance of the asset than the lower lying land of the Site. However the Site but it is still visible from some key view points and part of the city's rural surroundings, with its location on one of the hillsides surrounding Bath, it does contribute to the significance of the conservation area through allowing the appreciation, understanding and experience of this element of the asset's aesthetic value.

Sensitivity to development of the Site

4.110 The sensitivity of Bath Conservation Area to the proposals is **high**.

4.111 The Site is in a sensitive location due to its location on one of the green hills which surrounds the city of Bath. As an undeveloped area of agricultural land it forms part of the asset's setting which contributes to its significance, making it sensitive to development.

Potential for harm to the asset

4.112 The Site's undeveloped, agricultural character contributes to the significance of the asset and the loss of this character as a result of development has the potential to result in harm to the asset. The Site is in a sensitive location due to its location on one of the green hillsides which surround the city, although this sensitivity is lower than the higher slopes which extend to the west and north-west. Additionally the risk of harm is also somewhat lowered by the existing modern development activity immediately east of the Site, and it is likely any additional development would appears as an extension of this activity rather than a new element within the landscape. However, due to the sensitivity of the location the potential for harm to the asset as a result of the proposals remains **high**.

Level of effect

4.113 The development of the Site would have a **medium** level of effect on the Bath Conservation Area, which would equate to **less than substantial harm** to the asset.

Listed Buildings comprising the village of Weston

Summary

4.114 The settlement of Weston contains 68 listed buildings, mostly located along the roads of High Street, Crownhill and Church Road. These buildings indicate the historic core of the medieval settlement of Weston, which formed a separate village prior to becoming part of the city of Bath. These buildings comprise three Grade II* listed buildings (Thomas Warr Attwood Tomb in Church of All Saints Churchyard, 1394661; General Joseph Smith Tomb in Church of All Saints Churchyard, 1396358; Rear-Admiral Philip Affleck Tomb in Church of All Saints Churchyard, 1396362), with the remaining 65 buildings Grade II listed and mostly comprising residential dwellings.

Table 4.10: Listed buildings in Weston summary table

Importance	Type of change	Sensitivity	Risk of harm	Level of effect
High	Setting change	Low	Low	Low
High	Setting change	Low	Low	Less than substantial harm

Significance

The significance of the listed buildings in Weston is drawn from the following values:

- **Historical value:** The asset has historical (illustrative) value as representing the former settlement of Weston and its development.
- **Aesthetic value:** The significance of the listed buildings derives primarily from their architectural value as good examples of c.19th century or earlier structures.

4.115 The importance of these assets is therefore **high**.

Contribution of setting

4.116 The element of the setting of these assets which contributes most to their significance is their location within the former village of Weston. These assets have a group value as a representation of the previously separate historic settlement of Weston, with the former street pattern and historic character of the village still appreciable on the High Street, along which most of these structures are located. The wider setting of these assets provides limited contribution to their significance beyond providing general context to the historic development of the settlement of Weston to which they belong.

Contribution of the Site to asset's significance

4.117 The Site is located c.230m to the west of the assets.

4.118 The Site does not form part of the village of Weston, instead historically being part of the agricultural surroundings of the village. Additionally, a large amount of

intervening modern residential dwellings currently separates the Site from the historic buildings meaning there is limited intervisibility between the assets and the Site. The Site does not currently allow for any experience of the assets and does not allow for an understanding or appreciation of their historical or architectural value. Therefore the Site does not currently form any element of the setting of these assets which would contribute to their significance.

Sensitivity to development of the Site

4.119 The sensitivity of the listed buildings within Weston to the proposals is **low**.

4.120 The Site forms part of the wider setting of the assets but does not currently contribute to the significance of these assets due to the intervening distance and modern development separating the assets and the Site.

Potential for harm to the asset

4.121 The Site does not currently form part of the asset's setting which would allow for the understanding, appreciation or experience of the assets as part of a historic settlement.

4.122 The risk of harm as a result of development is therefore **low**.

Level of effect

4.123 The development of the Site would have a **low** level of effect on the listed buildings in Weston, which would likely equate to **no harm** to the assets.

Setting effects to WHS

4.124 The Site is located within the setting of the WHS, close to the northwestern boundary of the WHS itself. The Site forms part of the rural surroundings within the identified setting of the WHS, and is located within one of the important green hillsides, identified within the setting study (B&NES 2012).

4.125 The Site is at the lower point of the hillside and the higher slopes rising to the west towards Penn Hill and north-west towards Dean Hill/Kelston Round Hill are likely more visible within long distance views of the city and provide a greater contribution to the OUV than the lower lying land of the Site, but it is still visible from some key view points (e.g. Beckford's Tower and Prospect Stile). Therefore, the Site in its current form does contribute to the OUV of the WHS as one of the green

undeveloped hillsides surrounding the city, which is one of the attributes that contribute to the OUV via the ‘green setting of the City in a hollow in the hills’.

4.126 The possible alignment of the Via Julia Roman Road, Bath to Bitton (HER Ref. 60148) passes through the Site. This feature contributes to OUV via the Roman archaeology attribute, in particular to ‘Roman and archaeological remains beyond the city wall’, and the ‘surrounding road system and street plan of the Roman city’. Development affecting the Roman road could affect the physical connection of the WHS with its Roman hinterland and communications network, which would affect OUV.

4.127 Development within the Site could therefore affect the ability to appreciate the OUV of the WHS via a change in its setting on one of the important green hillsides which surround the city and contribute to OUV of the WHS. Therefore, this would result in a **high** level of harm, and a **high** effect.

Chapter 5
Urban Bath

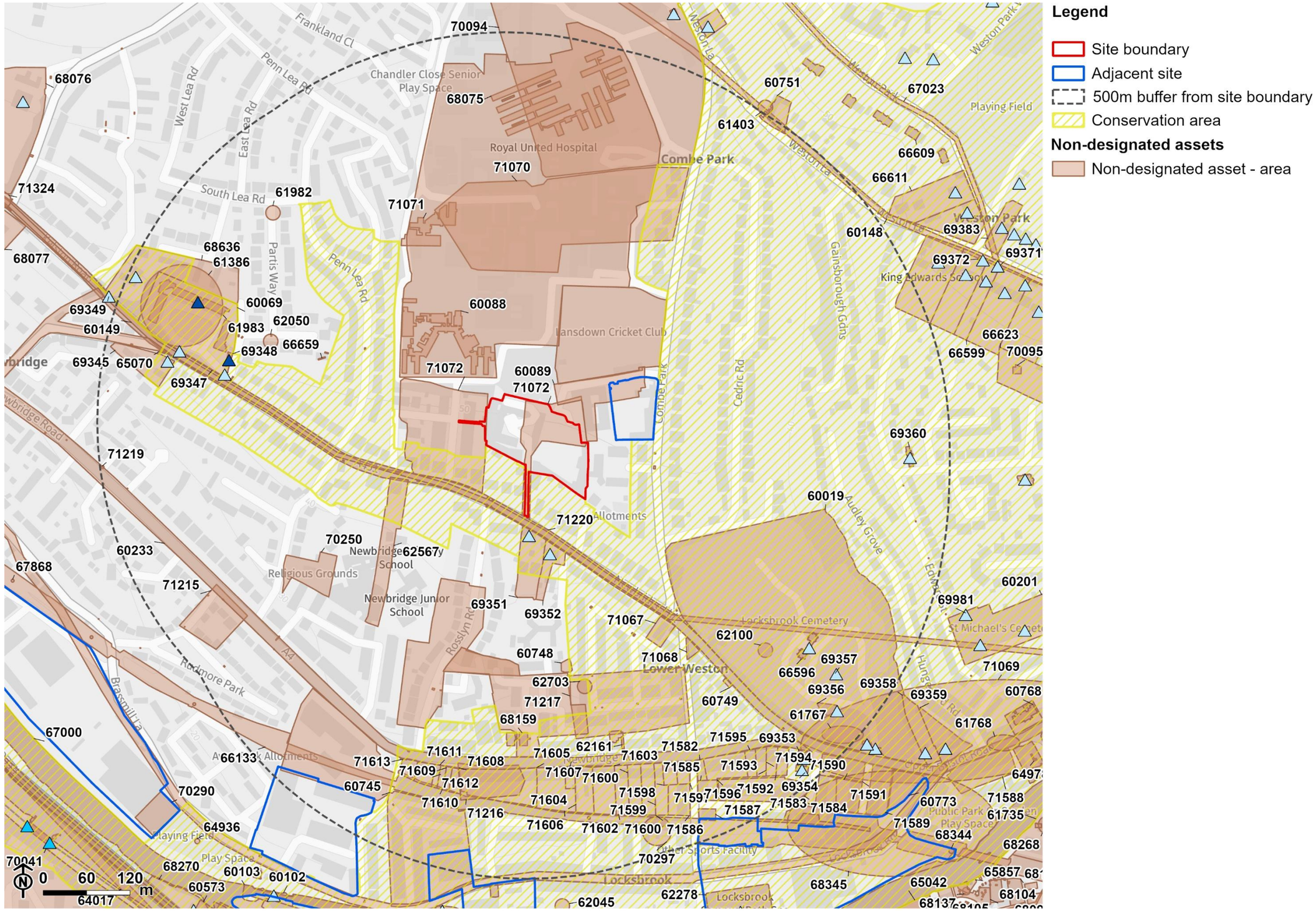
NHS House, Combe Park

Site description

5.1 The Site comprises of NHS House, Avon and Wiltshire Mental Health Partnership NHS Trust, associated car park and access road via Newbridge Hill. It is situated south of the Royal United Hospital (RUH) complex in the north-west side of Bath. The Site is surrounded by high density residential avenues on the south and the west and commercial complexes on the north and east.

5.2 The Site, designated assets and non-designated assets are shown on **Figure 5.1.**

Figure 5.1: NHS House, Combe Park



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Designated heritage assets within the Site

5.3 There are two designated heritage assets located within the Site:

- City of Bath World Heritage site
- Bath Conservation Area

Interactions with WHS

5.4 The Site is located within north-western area of the City of Bath WHS.

5.5 The Site is currently characterised by areas of modern built form, hardstanding, and intervening vegetation, which limit its direct contribution to the key attributes that convey the OUV of the WHS. In particular, the Site has limited intervisibility with the wider historic townscape and key designated views, reducing its role in expressing the coherent urban form, Georgian architecture, and landscape setting for which Bath is internationally recognised.

5.6 As a result, the Site is currently considered to make a relatively limited contribution to the significance and appreciation of the WHS when compared with more sensitive and visually prominent areas of the inscription. Nevertheless, its location within the WHS boundary means that it remains sensitive to change, and inappropriate development could adversely affect the setting, integrity, and overall appreciation of the WHS.

5.7 The potential level of effect arising from development is therefore considered to be **medium**, depending on the final scale, massing, height, design, and materials of the proposed scheme.

Bath Conservation Area

Summary

5.8 Bath Conservation Area was designated in 1968 as six separate areas then enlarged and combined as a single area in 1973. The designated area covers the current extent of the city of Bath as well as parts of the green landscape surrounding the city which were identified within the Bath City-Wide Character Appraisal (Bath and North East Somerset Planning Services 2005) as contributing "significantly to the

setting and character of the city". The Site is located within the Newbridge, Combe Park and Lower Weston Character Area.

5.9 Only a very small part of the Site extends into the Conservation Area, this is the access road which currently leads from Newbridge Hill to NHS House. The remainder of the Site is located outside the conservation area, with the south boundary following the edge of the designated area.

Table 5.1: Bath Conservation Area summary table

Importance	Type of change	Sensitivity	Risk of harm	Level of effect
High	Physical change	Medium	Low	Low
High	Physical change	Medium	Low	Less than substantial harm
High	Setting change	Medium	Medium	Low
High	Setting change	Medium	Medium	Less than substantial harm

Significance

5.10 The significance of Bath Conservation Area is drawn from the following values:

- **Evidential value:** Bath Conservation Area derives its evidential value from both its exceptional archaeological resource and the survival of its historic built fabric. Beneath the modern city lies a remarkably well-preserved archaeological record spanning over two millennia, including internationally significant remains associated with the Roman baths, sacred thermal springs, temple complex, and wider settlement. These buried deposits provide invaluable evidence for understanding the development of Bath from the Roman period onwards. Above ground, the widespread use of locally quarried oolitic Bath Stone preserves a tangible record of the city's architectural evolution, craftsmanship, and construction techniques. The survival of buildings and structures from the medieval, Georgian, Victorian, and later periods enables the study of changing architectural styles, urban planning principles, and engineering practices,

contributing substantially to our understanding of Bath's historic development and cultural significance.

- **Historical value:** The historical value of the Bath Conservation Area lies in its exceptional ability to illustrate the city's evolution from a Roman spa settlement into one of the most celebrated social, cultural, and therapeutic centres of the Georgian period. The historic townscape preserves the results of ambitious eighteenth-century urban planning, exemplified by internationally renowned developments such as the Circus, Royal Crescent, and Queen Square, which demonstrate innovative approaches to architectural design, speculative development, and the creation of a cohesive urban environment. The city's streets, buildings, and public spaces provide a tangible record of Bath's prominence as a fashionable destination for health, leisure, and society during the eighteenth and nineteenth centuries. The Conservation Area also retains strong associations with influential figures including Jane Austen, Beau Nash, and architects John Wood the Elder and John Wood the Younger, whose contributions helped shape Bath's distinctive character and enduring cultural significance.
- **Aesthetic value:** The aesthetic value of the Bath Conservation Area derives from the exceptional coherence of its historic townscape and its harmonious integration with the surrounding landscape. The city is renowned for the consistent use of locally quarried Bath Stone, which creates a distinctive visual unity across its streets, terraces, crescents, and public spaces. This architectural composition is exemplified by the elegant Georgian town planning of the eighteenth century, including grand terraces, sweeping crescents, formal squares, and carefully designed streetscapes that reflect the principles of classical architecture. Equally important is Bath's dramatic topographical setting within a natural bowl of surrounding hills, which allows for extensive views both into and out of the city. The close relationship between the built environment and the green hillsides creates a series of memorable panoramas and townscape vistas, contributing to the city's unique sense of place and establishing the iconic visual character for which Bath is internationally recognised.

5.11 The importance of this asset is therefore **high**.

Contribution of setting

5.12 The main elements of the conservation area's setting which contribute to its significance include those which help better understand the historic development of the city of Bath. The city of Bath sits within a valley with green hills rising above it and

this distinctive topography is one of the key characteristics which has influenced the development of Bath. Despite a large amount of expansion since the original Roman settlement core beside the River Avon, the settlement has retained a strong relationship with its surrounding landscape and the green hillsides surrounding the city are visible within numerous views from across the Bath Conservation Area. These views of the conservation area and its setting contribute strongly to its aesthetic value and would be considered key views.

5.13 Other key elements of the setting of the conservation area includes other historic associations which relate to key periods throughout the settlement's development, most notably those relating to the Roman and Georgian periods. These could include archaeological site such as Roman villas which provide an improvement understanding of the wider Roman landscape to which Bath belonged. Georgian site could include notable buildings, walks or rides which reflect an intention for the enjoyment of the natural landscape and appreciation of its picturesque qualities.

5.14 Key routes into and out of the city are also an important element of the asset's setting as they reflect the intended historic approach to the settlement. These routes include Roman roads, such as the Fosse Way, which were strategically important for the siting of the original settlement. They also include the later roads, with the main method for travelling to Bath during the Georgian period was by road and in most cases provided visitors with their first glimpse of the city. Another key access route to the city of Bath was the Kennet and Avon Canal, which was possible from Bristol from 1727 and from London from 1810. The expansion of the canal is part of the Georgian town planning of Bath and therefore also contributes to the significance of the conservation area.

Contribution of the Site to asset’s significance

5.15 A small section of the Site at its southern extent, including the access road leading to NHS House, falls within the Bath Conservation Area. The remaining area of the Site is located immediately north of the asset. The main part of the Site comprises the modern complex of buildings known as NHS House which are of late 20th century origin and a surface car park associated with the building. These building have no historical value as modern buildings of a relatively common type and design. As such the current sue of the Site makes no contribution to the significance or special interest of the conservation area.

5.16 Additionally, due to intervening vegetation and limited visual connectivity with the wider historic settlement, the Site does not allow for the appreciation, understanding or experience of the historic or aesthetic value of the conservation

area. Therefore, the Site makes limited contribution to the significance of the conservation area.

Sensitivity to development of the Site

5.17 The sensitivity of Bath Conservation Area to the proposals is **medium**.

5.18 The Site's location within and adjacent to the designated area means it is sensitive to development. This sensitivity is significantly reduced by the presence of modern development currently occupying the Site which limits the contribution the area makes to the significance of the asset.

Potential for harm to the asset

5.19 The Site forms part of the Bath Conservation Area and its immediate surroundings, however the modern development currently occupying the Site means it provides limited contribution to the significance of the asset.

5.20 Due to the existing modern road within the area of the Site located within the conservation area, it is unlikely development within this area would have any physical effects on the conservation area which would result in harm to its significance. Therefore the potential for harm to asset as a result of the physical effects of the proposals is **low**.

5.21 The potential for harm due to changes within the setting of the asset as a result of proposals is significantly reduced by the presence of existing modern development within the Site. Due to this existing development the proposals would result in only a minor change to the current character of the Site. While the Site does not currently form a key element of the asset's setting, it remains in a sensitive location due to its location within and adjacent to the designated area and therefore there is still some potential that new development could result in harm to the asset. The potential for harm to the asset as a result of the proposals is **medium**.

Level of effect

5.22 Physical effects to the asset as a result of the proposals would likely result in a **low** level of effect, which would likely equate to **less than substantial harm** or **no harm** to the asset.

5.23 Setting effects to the conservation area would likely result in a **low** level of effect, which would likely equate to **less than substantial harm** or **no harm** to the asset.

Non-designated heritage assets

5.24 There is one non-designated heritage asset recorded within the Site. This is identified in the table below:

Table 5.2: Non-designated heritage assets within the Site

Name	B&NES HER Ref.	Description	Heritage Importance
19th-century quarries and lime kilns, Kelston Road, Lower Weston	71072	Two quarries and associated lime kilns are depicted on the 1888 Ordnance Survey map. The area has been entirely developed and no above ground evidence of these features remains visible.	Medium

5.25 The 19th-century quarries and lime kilns on Kelston Road in Lower Weston, Bath, are significant because they represent the industrial underpinning of the city's Georgian and Victorian development, acting as a crucial component of the City of Bath World Heritage site (WHS) setting. While the core of Bath is recognised for its architecture, its setting includes the surrounding countryside and industrial site that supplied materials for that growth. It should be noted that the Site has already been subject to previous development, and it is therefore likely that sections of these assets have already been disturbed, altered, but not necessarily eliminated. As a result, the surviving remains within the Site are likely to be fragmentary and of reduced integrity and therefore their heritage importance has been reduced. While any additional groundworks would result in the loss of these remaining elements, the majority of each asset would persist beyond the Site boundary. Consequently, although the proposed development would result in harm, this would affect only limited, already compromised portions of the assets, and is therefore considered to fall within the category of 'less than substantial harm' to their overall significance.

Archaeological potential

5.26 No previous archaeological investigations have been recorded within the Site. The closest investigation was undertaken c.60m east of the Site and comprised of a watching brief undertaken between 2004 and 2005 during the Bath water mains rehabilitation scheme (HER Ref. 65070). No archaeological features or deposits were identified.

5.27 A possible Roman road is recorded immediately to the south of the Site following the alignment of the current A431 road (HER Ref. 60149). This road is the probable line of the Roman road from Bath to Sea Mills, probably crossing the Avon near Saltford.

5.28 Other evidence of activity within the surrounding area includes industrial activity, including 19th century quarries similar to the one that extends into the Site (HER Refs. 71072, 60747, 71217).

5.29 To the north of the Site is the Royal United Hospital (Bath War Hospital) (HER Ref. 60087). This orthopaedic hospital was established in 1924 and a nurses home and administration block were built in 1930, the nurses block was previously located within the Site but has since been replaced by another building.

5.30 While the Site's proximity to a possible Roman road suggest some potential for archaeological remains within its boundary, the previous activity within the Site has reduced the potential for the survival of such remains. This activity includes the 19th century quarrying activity, the early 20th century development associated with the Royal United Hospital and the late 20th century development currently occupying the Site. While it is likely any earlier archaeological remains have been removed due to the previous activity within the Site, remains associated with the 19th quarrying activity and the early 20th century buildings may survive below ground. Therefore archaeological potential of the Site is considered to be **moderate**.

Historic landscape character

5.31 The historic landscape character of the Site is defined as 20th Century ("New" or "Modern") Settlement, reflecting the gradual urban expansion, mid-century industrial redevelopment, and institutional growth that transformed Lower Weston’s historic hillside. This character type is consistent with the wider surrounding suburban fabric and field patterns, seamlessly blending modern civic and residential footprints with surviving boundaries from the area's earlier agricultural layout.

Heritage assets with the potential to experience setting change

5.32 The Bath Conservation Area is the only heritage asset within the Site's surroundings which has been identified as being potentially sensitive to development as a result of changes to its setting. The potential for harm to these assets has been assessed above. The assessment found a medium potential for harm to this asset as a result of the proposals as it the Site is located within close proximity to the asset. However due to the modern development currently occupying the Site it is considered likely any harm would be of a low level of effect and equate to a less than substantial level of harm.

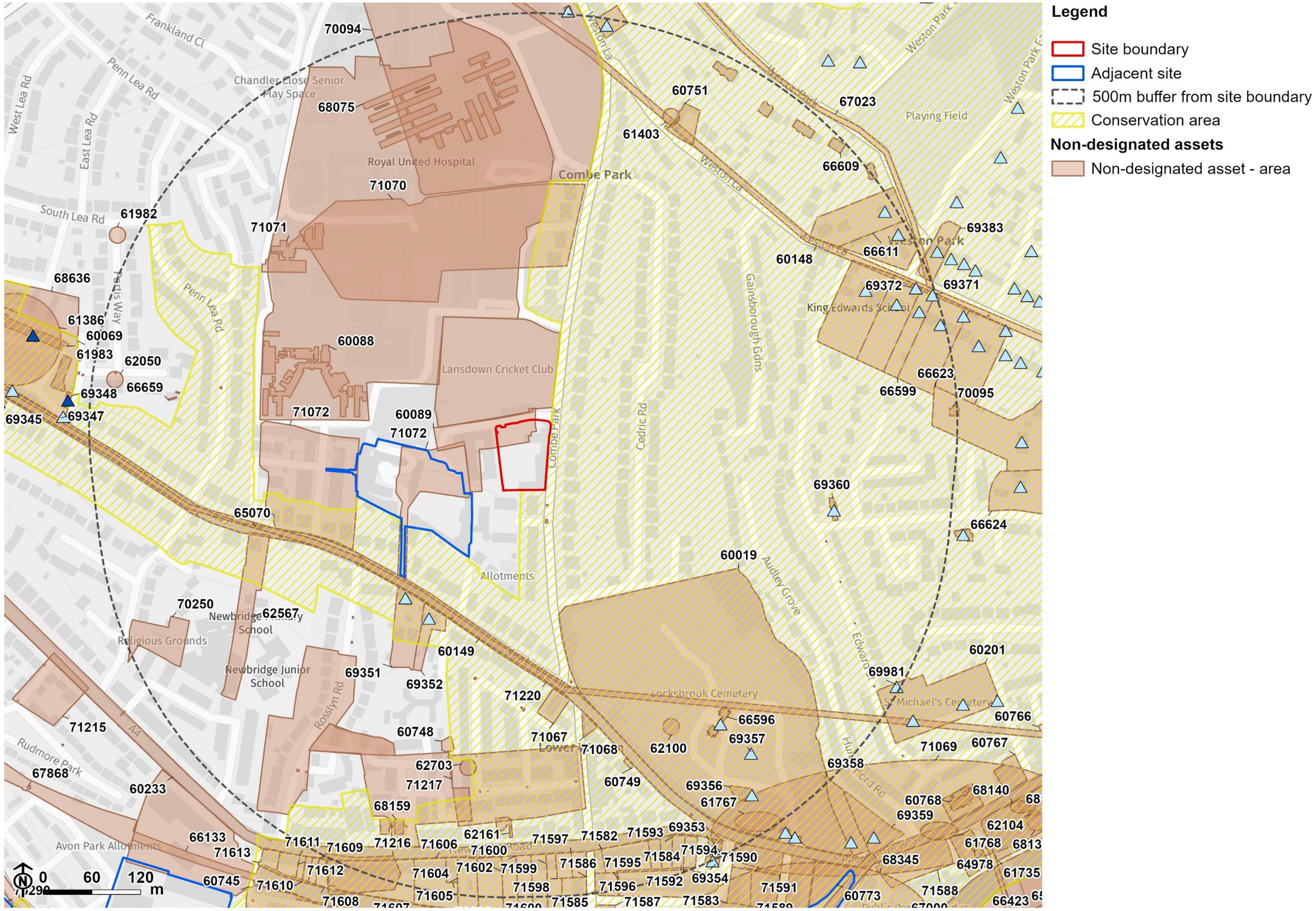
Car Park adjacent to Combe Park

Site description

5.33 The Site comprises a car park located to the east of St John's Foundation, Combe Park. It occupies a broadly rectangular infill plot within an established urban area. Lansdown Cricket Club lies immediately to the north of the Site, while residential properties fronting Combe Park are situated to the east. The surrounding area is characterised by a mix of institutional, recreational, and residential land uses, reflecting the predominantly suburban character of Lower Weston.

5.34 The Site, designated assets and non-designated assets are shown on **Figure 5.2.**

Figure 5.2: Car park adjacent to Combe Park



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Designated heritage assets within the Site

5.35 There is one designated heritage asset located within the Site:

- City of Bath World Heritage Site

Interactions with WHS

5.36 The Site is located within the north-western area of the City of Bath WHS.

5.37 The Site is currently characterised by areas of modern built form, hardstanding, and vegetation which borders the Site, which limit its direct contribution to the key attributes that convey the OUV of the WHS. In particular, the Site has limited intervisibility with the wider historic townscape and key designated views, reducing its role in expressing or contributing to the coherent urban form, Georgian architecture, and landscape setting for which Bath is internationally recognised.

5.38 As a result, the Site is currently considered to make a relatively limited contribution to the significance and appreciation of the WHS when compared with more sensitive and visually prominent areas of the WHS. Nevertheless, its location within the WHS boundary means that it remains sensitive to change, and inappropriate development could adversely affect the setting, integrity, and overall appreciation of the designated heritage asset.

5.39 The potential level of effect arising from development is therefore considered to be **medium**, depending on the final scale, massing, height, design, and materials of the proposed scheme.

Non-designated heritage assets

5.40 The Site contains one non-designated asset. This is identified in the table below:

Table 5.3: Non-designated heritage assets within the Site

Name	B&NES HER Ref.	Description	Heritage Importance
Portway House, Combe Park, Weston	60089	A former bookbinding works depicted on 1888 Ordnance Survey map and	Low

Name	B&NES HER Ref.	Description	Heritage Importance
		expanded in the mid 20th century. The building is no longer extant and has been replaced by the St John's Hospital, Combe Park Almshouse building, which contains 54 flats and a chapel, constructed in 2002-3	

Archaeological potential

5.41 No previous archaeological investigations have been recorded within the Site. The closest investigation was undertaken c.30m east of the Site and comprised of a watching brief undertaken between 2004 and 2005 during the Bath water mains rehabilitation scheme (HER Ref. 65070). The investigation identified no features or finds of archaeological significance in or around the Site.

5.42 A possible Roman road is recorded c.160m to the south of the Site following the alignment of the current A431 road (HER Ref. 60149). This road is the probable line of the Roman road from Bath to Sea Mills, probably crossing the Avon near Saltford.

5.43 Immediately north of the Site is the Lansdown Cricket Club which was founded in c.1825 and moved to Combe Park to the north of the Site from Sydeham Field in 1865. The associated pavilion located along the northern boundary of the Site is visible on late 19th century Ordnance Survey mapping.

5.44 Other evidence of activity within the surrounding area includes industrial activity, including 19th century quarries (HER Refs. 71072, 60747, 71217). To the north-west of the Site is the Royal United Hospital (Bath War Hospital) (HER Ref. 60087). This orthopaedic hospital was established in 1924 and a nurses' home and administration block were built in 1930.

5.45 While the Site's proximity to a possible Roman road suggests some potential for archaeological remains within its boundary, the previous development activity within the Site has reduced the potential for the survival of such remains. This activity includes the former Portway House structure and the modern surface car park currently occupying the Site. While it is likely any earlier archaeological remains have been removed due to the previous activity within the Site, remains associated with

the former Portway House buildings may survive below ground. Therefore archaeological potential of the Site is considered to be **moderate**.

Historic landscape character

5.46 The historic landscape character of the Site is defined as 20th Century ("New" or "Modern") Settlement, reflecting the gradual urban expansion, mid-century industrial redevelopment, and institutional growth that transformed Lower Weston's historic hillside. This character type is consistent with the wider surrounding suburban fabric and field patterns, seamlessly blending modern civic and residential footprints with surviving boundaries from the area's earlier agricultural layout. The northern half of site is characterised as a large scale utility landscape, reflecting its transition from historical agricultural use into a modern infrastructure corridor.

Heritage assets with the potential to experience setting change

5.47 The following designated heritage asset has been identified as having the potential to experience effects to significance due to development within the Site as a result of changes to setting:

Bath Conservation Area

Summary

5.48 Bath Conservation Area was designated in 1968 as six separate areas then enlarged and combined as a single area in 1973. The designated area covers the current extent of the city of Bath as well as parts of the green landscape surrounding the city which were identified within the Bath City-Wide Character Appraisal (Bath and North East Somerset Planning Services 2005) as contributing "significantly to the setting and character of the city". The Site is located within the Newbridge, Combe Park and Lower Weston Character Area.

Table 5.4: Bath Conservation Area summary table

Importance	Type of change	Sensitivity	Risk of harm	Level of effect
High	Setting change	Medium	Medium	Low

Importance	Type of change	Sensitivity	Risk of harm	Level of effect
High	Setting change	Medium	Medium	Less than substantial harm

Significance

5.49 The significance of Bath Conservation Area is drawn from the following values:

- **Evidential value:** Bath Conservation Area derives its evidential value from both its exceptional archaeological resource and the survival of its historic built fabric. Beneath the modern city lies a remarkably well-preserved archaeological record spanning over two millennia, including internationally significant remains associated with the Roman baths, sacred thermal springs, temple complex, and wider settlement. These buried deposits provide invaluable evidence for understanding the development of Bath from the Roman period onwards. Above ground, the widespread use of locally quarried oolitic Bath Stone preserves a tangible record of the city's architectural evolution, craftsmanship, and construction techniques. The survival of buildings and structures from the medieval, Georgian, Victorian, and later periods enables the study of changing architectural styles, urban planning principles, and engineering practices, contributing substantially to our understanding of Bath's historic development and cultural significance.
- **Historical value:** The historical value of the Bath Conservation Area lies in its exceptional ability to illustrate the city's evolution from a Roman spa settlement into one of the most celebrated social, cultural, and therapeutic centres of the Georgian period. The historic townscape preserves the results of ambitious eighteenth-century urban planning, exemplified by internationally renowned developments such as the Circus, Royal Crescent, and Queen Square, which demonstrate innovative approaches to architectural design, speculative development, and the creation of a cohesive urban environment. The city's streets, buildings, and public spaces provide a tangible record of Bath's prominence as a fashionable destination for health, leisure, and society during the eighteenth and nineteenth centuries. The Conservation Area also retains strong associations with influential figures including Jane Austen, Beau Nash, and architects John Wood the Elder and John Wood the Younger, whose contributions helped shape Bath's distinctive character and enduring cultural significance.

- **Aesthetic value:** The aesthetic value of the Bath Conservation Area derives from the exceptional coherence of its historic townscape and its harmonious integration with the surrounding landscape. The city is renowned for the consistent use of locally quarried Bath Stone, which creates a distinctive visual unity across its streets, terraces, crescents, and public spaces. This architectural composition is exemplified by the elegant Georgian town planning of the eighteenth century, including grand terraces, sweeping crescents, formal squares, and carefully designed streetscapes that reflect the principles of classical architecture. Equally important is Bath's dramatic topographical setting within a natural bowl of surrounding hills, which allows for extensive views both into and out of the city. The close relationship between the built environment and the green hillsides creates a series of memorable panoramas and townscape vistas, contributing to the city's unique sense of place and establishing the iconic visual character for which Bath is internationally recognised

5.50 The importance of this asset is therefore **high**.

Contribution of setting

5.51 The main elements of the conservation area's setting which contribute to its significance include those which help better understand the historic development of the city of Bath. The city of Bath sits within a valley with green hills rising above it and this distinctive topography is one of the key characteristics which has influenced the development of Bath. Despite a large amount of expansion since the original Roman settlement core beside the River Avon, the settlement has retained a strong relationship with its surrounding landscape and the green hillsides surrounding the city are visible within numerous views from across the Bath Conservation Area. These views of the conservation area and its setting contribute strongly to its aesthetic value and would be considered key views.

5.52 Other key elements of the setting of the conservation area includes other historic associations which relate to key periods throughout the settlement's development, most notably those relating to the Roman and Georgian periods. These could include archaeological site such as Roman villas which provide an improvement understanding of the wider Roman landscape to which Bath belonged. Georgian site could include notable buildings, walks or rides which reflect an intention for the enjoyment of the natural landscape and appreciation of its picturesque qualities.

5.53 Key routes into and out of the city are also an important element of the asset's setting as they reflect the intended historic approach to the settlement. These routes

include Roman roads, such as the Fosse Way, which were strategically important for the siting of the original settlement. They also include the later roads, with the main method for travelling to Bath during the Georgian period was by road and in most cases provided visitors with their first glimpse of the city. Another key access route to the city of Bath was the Kennet and Avon Canal, which was possible from Bristol from 1727 and from London from 1810. The expansion of the canal is part of the Georgian town planning of Bath and therefore also contributes to the significance of the conservation area.

Contribution of the Site to asset's significance

5.54 The Site is located immediately west of the Bath Conservation Area, with the eastern boundary of the Site following the edge of the conservation area.

5.55 The main part of the Site comprises a surface car park associated with the neighbouring St John's Hospital, Combe Park Almshouse residential building. Therefore the current development occupying the Site has no historical value and has not direct functional relationship with any element of the conservation area which would form part of its special interest. As such the current use of the Site makes no contribution to the significance of the conservation area.

5.56 Additionally due to intervening vegetation and limited visual connectivity with the wider historic settlement, the Site does not allow for the appreciation, understanding or experience of the historic or aesthetic value of the conservation area. Therefore Site makes limited contribution to the significance of the conservation area.

Sensitivity to development of the Site

5.57 The sensitivity of Bath Conservation Area to the proposals is **medium**.

5.58 The Site's location adjacent to the designated area means it is sensitive to development. This sensitivity is significantly reduced by the presence of modern development currently occupying the Site which limits the contribution the area makes to the significance of the asset.

Potential for harm to the asset

5.59 The potential for harm as a result of proposals is significantly reduced by the presence of existing modern development within the Site. Due to this existing development the proposals would result in only a minor change to the current character of the Site. While the Site does not currently form a key element of the

asset's setting, it remains in a sensitive location due to its location adjacent to the designated area. Therefore there is still some potential that new development could result in harm to the asset. The potential for harm to the asset as a result of the proposals is **medium**.

Level of effect

5.60 Setting effects to designated heritage assets within the Site would likely result in a **low** level of effect, which would likely equate to **less than substantial harm** or **no harm** to the asset.

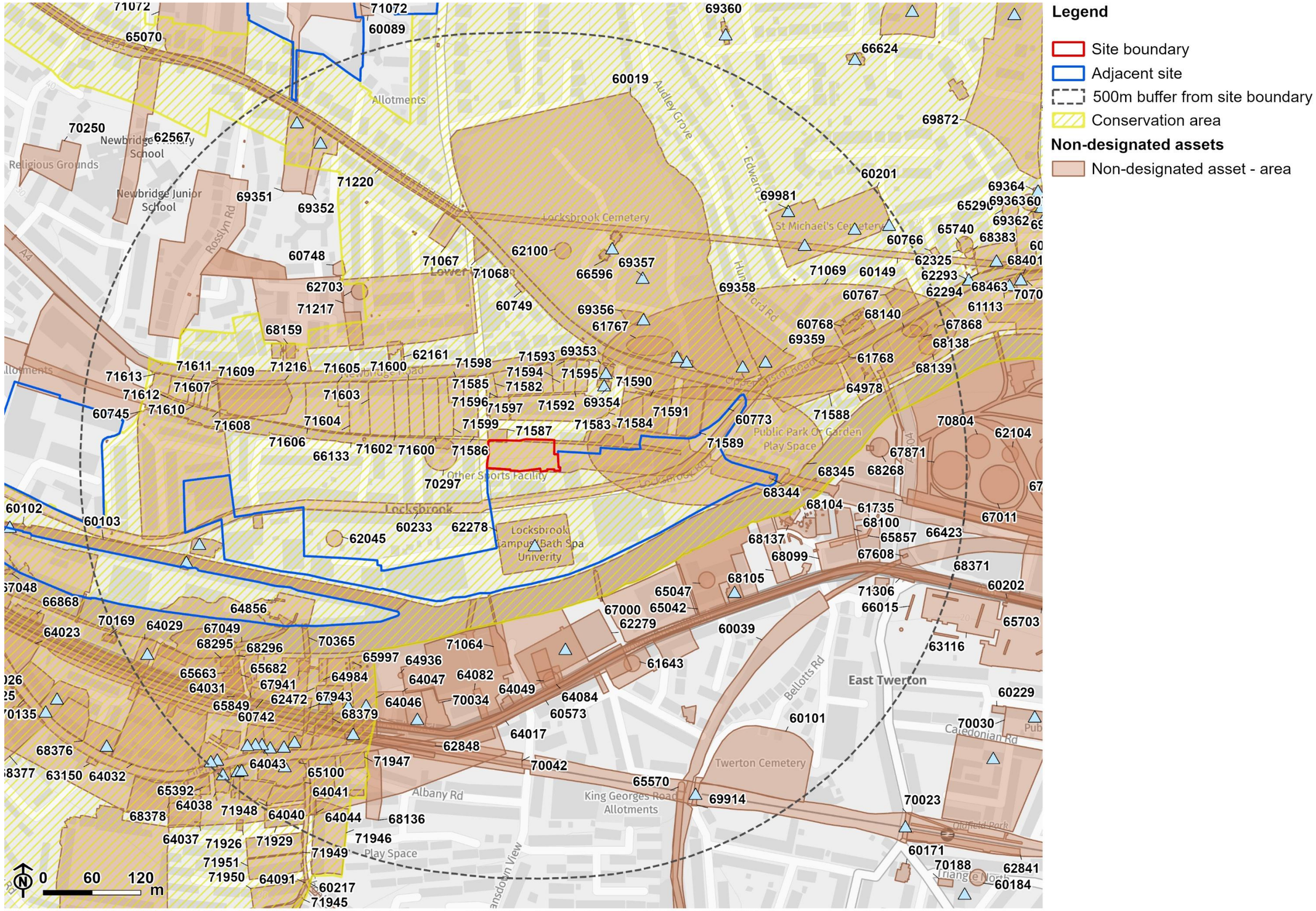
Land east of Station Road, Newbridge

Site description

5.61 The Site on Land east of Station Road is primarily in use as a car park and is heavily wooded on all sides, almost rectangular plot of land nestled between residential and commercial zones. To its immediate south is the industrial compound known as the "Production Quarter" featuring large warehouses and vehicle parking.

5.62 The Site, designated assets and non-designated assets are shown on **Figure 5.3.**

Figure 5.3: Land east of Station Road, Newbridge



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Designated heritage assets within the Site

5.63 There are two designated heritage assets within the Site:

- City of Bath World Heritage Site
- Bath Conservation Area

Interactions with WHS

5.64 The Site is located within the western part of the City of Bath World Heritage site.

5.65 The Site is currently characterised by modern hardstanding through its use as a car park on the edge of the Locksbrook Road industrial estate, which limits its direct contribution to the key attributes that convey the OUV of the WHS.

5.66 The Site is also heavily wooded on all sides, meaning it has limited intervisibility with the wider historic townscape and key designated views, further reducing its role in expressing or contributing to the coherent urban form, Georgian architecture, and landscape setting for which Bath is internationally recognised.

5.67 As a result, the Site is currently considered to make a relatively limited contribution to the significance and appreciation of the WHS when compared with more sensitive and visually prominent areas of the inscription. Nevertheless, its location within the WHS boundary means that it remains sensitive to change, and inappropriate development could adversely affect the setting, integrity, and overall appreciation of the designated heritage asset.

5.68 The potential level of effect arising from development is therefore considered to be **medium**, depending on the final scale, massing, height, design, and materials of the proposed scheme.

Bath Conservation Area

Summary

5.69 Bath Conservation Area was designated in 1968 as six separate areas then enlarged and combined as a single area in 1973. The Site is located within the Brassmill Lane, Locksbrook and Western Riverside character area. This character

area covers a narrow, mostly linear area of Bath which is largely dictated by the course of the River Avon. It runs from Churchill Bridge in a broadly S-shaped curve to a point near the junction of Lower Bristol Road and Newbridge Road. It is of a largely industrial or transport character with scattered late Georgian buildings along major roads that were constructed as the city of Bath expanded westwards.

Table 5.5: Bath Conservation Area summary table

Importance	Type of change	Sensitivity	Risk of harm	Level of effect
High	Physical change	Medium	Medium	Low
High	Physical change	Medium	Medium	Less than substantial harm
High	Setting change	Medium	Medium	Low
High	Setting change	Medium	Medium	Less than substantial harm

Significance

5.70 The significance of Bath Conservation Area is drawn from the following values:

- **Evidential value:** Bath Conservation Area derives its evidential value from both its exceptional archaeological resource and the survival of its historic built fabric. Beneath the modern city lies a remarkably well-preserved archaeological record spanning over two millennia, including internationally significant remains associated with the Roman baths, sacred thermal springs, temple complex, and wider settlement. These buried deposits provide invaluable evidence for understanding the development of Bath from the Roman period onwards. Above ground, the widespread use of locally quarried oolitic Bath Stone preserves a tangible record of the city's architectural evolution, craftsmanship, and construction techniques. The survival of buildings and structures from the medieval, Georgian, Victorian, and later periods enables the study of changing architectural styles, urban planning principles, and engineering practices, contributing substantially to our understanding of Bath's historic development and cultural significance.

- **Historical value:** The historical value of the Bath Conservation Area lies in its exceptional ability to illustrate the city's evolution from a Roman spa settlement into one of the most celebrated social, cultural, and therapeutic centres of the Georgian period. The historic townscape preserves the results of ambitious eighteenth-century urban planning, exemplified by internationally renowned developments such as the Circus, Royal Crescent, and Queen Square, which demonstrate innovative approaches to architectural design, speculative development, and the creation of a cohesive urban environment. The city's streets, buildings, and public spaces provide a tangible record of Bath's prominence as a fashionable destination for health, leisure, and society during the eighteenth and nineteenth centuries. The Conservation Area also retains strong associations with influential figures including Jane Austen, Beau Nash, and architects John Wood the Elder and John Wood the Younger, whose contributions helped shape Bath's distinctive character and enduring cultural significance.
- **Aesthetic value:** The aesthetic value of the Bath Conservation Area derives from the exceptional coherence of its historic townscape and its harmonious integration with the surrounding landscape. The city is renowned for the consistent use of locally quarried Bath Stone, which creates a distinctive visual unity across its streets, terraces, crescents, and public spaces. This architectural composition is exemplified by the elegant Georgian town planning of the eighteenth century, including grand terraces, sweeping crescents, formal squares, and carefully designed streetscapes that reflect the principles of classical architecture. Equally important is Bath's dramatic topographical setting within a natural bowl of surrounding hills, which allows for extensive views both into and out of the city. The close relationship between the built environment and the green hillsides creates a series of memorable panoramas and townscape vistas, contributing to the city's unique sense of place and establishing the iconic visual character for which Bath is internationally recognised.

5.71 The importance of this asset is therefore **high**.

Contribution of setting

5.72 The main elements of the conservation area's setting which contribute to its significance include those which help better understand the historic development of the city of Bath. The city of Bath sits within a valley with green hills rising above it and this distinctive topography is one of the key characteristics which has influenced the development of Bath. Despite a large amount of expansion since the original Roman settlement core beside the River Avon, the settlement has retained a strong

relationship with its surrounding landscape and the green hillsides surrounding the city are visible within numerous views from across the Bath Conservation Area. These views of the conservation area and its setting contribute strongly to its aesthetic value and would be considered key views.

5.73 Other key elements of the setting of the conservation area includes other historic associations which relate to key periods throughout the settlement's development, most notably those relating to the Roman and Georgian periods. These could include archaeological Site such as Roman villas which provide an improvement understanding of the wider Roman landscape to which Bath belonged. Georgian Site could include notable buildings, walks or rides which reflect an intention for the enjoyment of the natural landscape and appreciation of its picturesque qualities.

5.74 Key routes into and out of the city are also an important element of the asset's setting as they reflect the intended historic approach to the settlement. These routes include Roman roads, such as the Fosse Way, which were strategically important for the siting of the original settlement. They also include the later roads, with the main method for travelling to Bath during the Georgian period was by road and in most cases provided visitors with their first glimpse of the city. Another key access route to the city of Bath was the Kennet and Avon Canal, which was possible from Bristol from 1727 and from London from 1810. The expansion of the canal is part of the Georgian town planning of Bath and therefore also contributes to the significance of the conservation area.

Contribution of the Site to asset’s significance

5.75 The Site is located within the western part of the Bath Conservation Area.

5.76 The Site is located within the Brassmill Lane, Locksbrook and Western Riverside character area. The draft character area appraisal identifies the special interest of the area comprising largely its transport and industrial associations, with scattered late Georgian buildings along major roads demonstrating the city's expansion, and high quality late Victorian housing. The Site does not contain any of these characteristics as a modern surface carpark surrounded by dense vegetation. This dense vegetation also prevents most views of the Site, both from outside looking inwards and from within the Site the rest of the conservation area. This lack of intervisibility means the special historic and architectural interest of the conservation cannot be understood, appreciate or experienced from within the Site.

5.77 The draft character area appraisal does not identify the Site as a positive or negative contributor to the special interest of the character area, suggesting the Site in its current form provides a neutral contribution to the significance of the asset.

Sensitivity to development of the Site

5.78 The sensitivity of Bath Conservation Area to the proposals is **medium**.

5.79 The Site's location within the conservation area means it is sensitive to development. While the Site itself does not contain any element which contributes to the significance of the conservation area, it is located within close proximity to several groups of non-designated buildings of merit identified by the draft character area appraisal as making a positive contribution to the special interest of the area. These buildings of merit comprise the rows of terraces along Ashley Avenue, Station Road and Newbridge Road. The sensitivity of the assets is significantly reduced by the presence of the modern car park development currently occupying the Site which limits the contribution the area makes to the significance of the asset. The sensitivity is also reduced by the lack of intervisibility between the Site and its surroundings.

Potential for harm to the asset

5.80 The Site forms part of the Bath Conservation Area and its immediate surroundings, however the modern development currently occupying the Site means it provides limited contribution to the significance of the asset.

5.81 Due to the existing car park within the area of the Site, it is unlikely development within this area would have any physical effects on the conservation area which would result in harm to its significance. Therefore, the potential for harm to asset as a result of the physical effects of the proposals is **low**.

5.82 The potential for harm due to changes within the setting of the asset as a result of proposals is significantly reduced by the presence of existing modern development within the Site. Due to this existing development the proposals would not result in the loss of any area of the conservation which holds historic or architectural value. While the Site does not currently form a key element of the asset's setting, it remains in a sensitive location due to its location within the designated area and therefore there is still some potential that new development could result in harm to the asset, especially due to its proximity to the non-designated buildings of merit located immediately north of the Site along Ashley Avenue, Station Road and Newbridge Road. The potential for harm to the asset as a result of the proposals is **medium**.

Level of effect

5.83 Physical effects to the asset as a result of the proposals would likely result in a **low** level of effect, which would likely equate to **less than substantial harm** or **no harm** to the asset.

5.84 Setting effects to the conservation area would likely result in a **low** level of effect, which would likely equate to **less than substantial harm** or **no harm** to the asset.

Non-designated heritage assets

5.85 here is one non-designated heritage asset recorded within the Site. This is identified in the table below:

Table 5.6: Non-designated heritage assets within the Site

Name	B&NES HER Ref.	Description	Heritage Importance
Midland Railway, Bath to Mangotsfield branch line	66133	The line opened in c.1869, used for passengers until 1966 and coal until 1971	Low

Archaeological potential

5.86 No previous archaeological investigations have been recorded within the Site. The closest recorded investigation is a watching brief at 32 Newbridge Road located c.150m north-west of the Site (HER Ref. 65343). Two dog burials, one dated to 1883, were uncovered. No further archaeological deposits or features were recorded.

5.87 A possible Roman settlement has been recorded c.40m east of the Site (HER Ref. 68345). This possible settlement has been recorded from a high concentration of finds found during borehole survey (including samianware, a leather trap, animal bone, mussel shells). However, it is thought that these finds could possibly originate from activity higher up the valley, but their survival below the modern road surface indicates a level of preservation despite modern activity and the record of Roman cemetery to the north of these finds (HER Ref. 71069) further supports the possibility of Roman occupation within this area.

5.88 The entire site is covered by the former Midland railway line, which lowers the potential for archaeological remains to be found within the Site. However, the survival of a high quantity of Roman finds beneath the railway line c.40m east of the Site suggests there is potential for some archaeological remains or deposits to survive below the current modern and former railway activity. Therefore, the archaeological potential of the Site is **moderate**.

Historic landscape character

5.89 The historic landscape character of the Site is large scale utility landscapes, reflecting the consolidation of transport networks, manufacturing yards, and commercial infrastructure that redefined the area's physical layout during the industrial era. This character type is consistent with the wider surrounding urban industrial fabric, where expansive warehouse footprints, distribution hubs, and deep linear boundaries continue to dictate the layout of the land today.

Heritage assets with the potential to experience setting change

5.90 The Bath Conservation Area is the only heritage asset within the Site's surroundings which has been identified as being potentially sensitive to development as a result of changes to its setting. The potential for harm to this asset has been assessed above. This assessment found there to be a medium potential for harm to these assets as due to the Site's location within the conservation area and proximity to a number of non-designated buildings of merit. However due to the current modern car park character of the Site it is expected the level of effect would be **low** and equate to **less than substantial harm** to the asset.

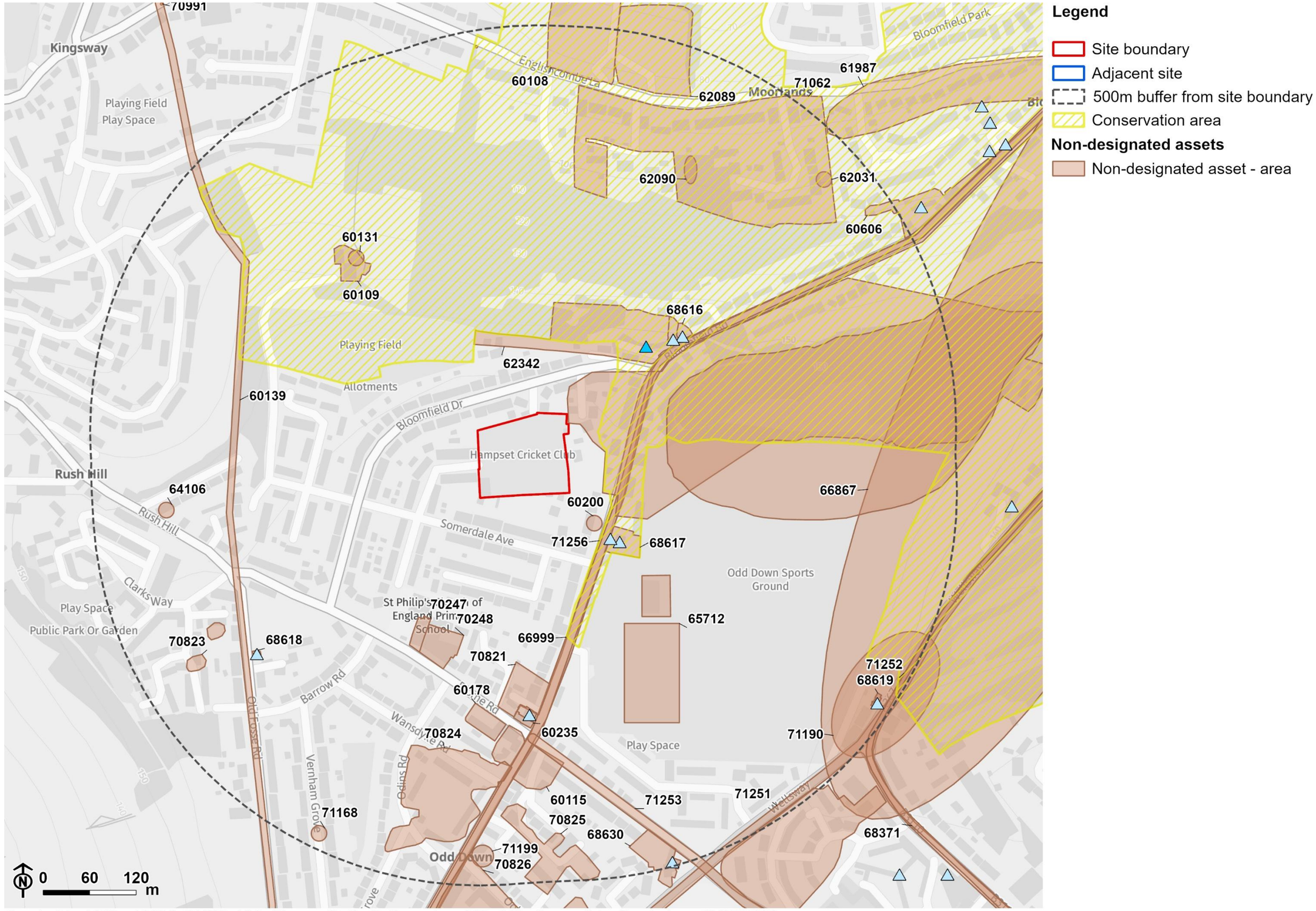
Hampset Cricket Club

Site description

5.91 The Site comprises of an active cricket ground located in the south of Bath, situated off Bloomfield Rise in Odd Down. It is an elevated, levelled plateau enclosed by mature hedgerows, dense treelines, and residential properties to the north, east, and west. It also contains a single-storey timber/brick clubhouse pavilion and an outdoor two-lane artificial practice net facility.

5.92 The Site, designated assets and non-designated assets are shown on **Figure 5.4.**

Figure 5.4: Hampset Cricket Club



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Designated heritage assets within the Site

5.93 The Site contains one designated heritage asset:

- City of Bath World Heritage site

Interactions with WHS

5.94 The Site is located within the southern part of the City of Bath WHS.

5.95 The Site is currently in use as the Hampset Cricket Club, characterised by areas of cricket field, modern built form and surrounding vegetation. These features limit its direct contribution to the key attributes that convey the OUV of the WHS. In particular, the Site has limited intervisibility with the wider historic townscape and key designated views, reducing its role in expressing or contributing to the coherent urban form, Georgian architecture, and landscape setting for which Bath is internationally recognised. As a result, the Site is considered to make a relatively limited contribution to the significance and appreciation of the WHS when compared with more sensitive and visually prominent areas of the inscription. Nevertheless, its location within the WHS boundary means that it remains sensitive to change, and inappropriate development could adversely affect the setting, integrity, and overall appreciation of the designated heritage asset.

5.96 The potential level of effect arising from development is therefore considered to be **medium**, depending on the final scale, massing, height, design, and materials of the proposed scheme.

Non-designated heritage assets

5.97 There are no non-designated heritage assets recorded within the Site.

Archaeological potential

5.98 No previous archaeological investigations have been recorded within the Site. The closest previous investigation to the Site comprises a watching brief carried out in 2014, c.140m south-east of the Site (HER Ref. 65712). No archaeological features or deposits were recorded during this investigation.

5.99 A possible Iron Age enclosure known as Berwick Camp (or 'Besewyke' or 'Brerewyck') is recorded c.130m east of the Site (HER Ref. 61504). The asset has

been recorded from observations dating back to the 19th century, however no above ground evidence of the camp has been identified and no intrusive investigations have been conducted to confirm its presence/extent.

5.100 A large amount of Roman activity has been recorded across the wider surrounding area including the main route of the Fosse Way c.60m to the east of the Site running roughly north-east to south-west (HER Ref. 66999) towards Bath, with associated quarries also recorded immediately east of the Site which are thought to have been quarrying stone to construct the road (HER Ref. 62083). A second possible deviation from the main route of the Fosse Way has also been recorded c.320m west of the Site (HER Ref. 60139). Further Roman occupation in the area includes a possible Roman building located c.430m south-east of the Site (HER Ref. 71190) and part of the Bath Roman cemetery c.550m north-east of the Site (HER Ref. 61987).

5.101 The deserted medieval settlement of Berewick is recorded c.380m east of the Site (HER Ref. 66867), the northern limit of which may have been along the line of Hatfield Road and Greenway Lane, with the southern boundary at West Field, S of Frome Road.

5.102 Human remains were found c.50m south-east of the Site in 1929-30 with a scaffold also found nearby suggesting the possibility of an execution site (HER Ref. 60200), which is further supported by the adjacent field name of Gallows Tynning and there is documentary evidence to suggest a gibbet was present at the Site in the mid-18th century.

5.103 The proximity of the Site to the route of the Fosse Way, as well as the possible nearby earlier Iron Age camp, suggests there is potential for late prehistoric or Roman activity to be found within the Site. From the medieval period onwards it is likely the Site formed part of the agricultural hinterland surrounding the nearby settlements. The Site's subsequent use as a cricket ground has prevented the possible disturbance of remains through development activity and it is likely any potential archaeological remains would be of a good level of preservation. The archaeological potential of the Site is therefore moderate-high.

Historic landscape character

5.104 The historic landscape character of the Site is recorded as late medieval enclosed open fields created by local arrangement and exchange, which is consistent with the wider field-system that likely derives its origins from an earlier open-field system.

Heritage assets with the potential to experience setting change

5.105 The following designated heritage asset has been identified as having the potential to experience effects to significance due to development within the Site as a result of changes to setting:

- Bath Conservation Area

Bath Conservation Area

Summary

5.106 Bath Conservation Area was designated in 1968 as six separate areas then enlarged and combined as a single area in 1973. The designated area covers the current extent of the city of Bath as well as parts of the green landscape surrounding the city which were identified within the Bath City-Wide Character Appraisal (Bath and North East Somerset Planning Services 2005) as contributing "significantly to the setting and character of the city".

Table 5.7: Bath Conservation Area summary table

Importance	Type of change	Sensitivity	Risk of harm	Level of effect
High	Setting change	Medium	Medium	Low
High	Setting change	Medium	Medium	Less than substantial harm

Significance

5.107 The significance of Bath Conservation Area is drawn from the following values:

- **Evidential value:** Bath Conservation Area derives its evidential value from both its exceptional archaeological resource and the survival of its historic built fabric. Beneath the modern city lies a remarkably well-preserved archaeological record spanning over two millennia, including internationally significant remains associated with the Roman baths, sacred thermal springs, temple complex, and wider settlement. These buried deposits provide invaluable evidence for understanding the development of Bath from the Roman period onwards. Above ground, the widespread use of locally quarried oolitic Bath Stone preserves a tangible record of the city's architectural evolution, craftsmanship, and construction techniques. The survival of buildings and structures from the medieval, Georgian, Victorian, and later periods enables the study of changing architectural styles, urban planning principles, and engineering practices, contributing substantially to our understanding of Bath's historic development and cultural significance.
- **Historical value:** The historical value of the Bath Conservation Area lies in its exceptional ability to illustrate the city's evolution from a Roman spa settlement into one of the most celebrated social, cultural, and therapeutic centres of the Georgian period. The historic townscape preserves the results of ambitious eighteenth-century urban planning, exemplified by internationally renowned developments such as the Circus, Royal Crescent, and Queen Square, which demonstrate innovative approaches to architectural design, speculative development, and the creation of a cohesive urban environment. The city's streets, buildings, and public spaces provide a tangible record of Bath's prominence as a fashionable destination for health, leisure, and society during the eighteenth and nineteenth centuries. The Conservation Area also retains

strong associations with influential figures including Jane Austen, Beau Nash, and architects John Wood the Elder and John Wood the Younger, whose contributions helped shape Bath's distinctive character and enduring cultural significance.

- **Aesthetic value:** The aesthetic value of the Bath Conservation Area derives from the exceptional coherence of its historic townscape and its harmonious integration with the surrounding landscape. The city is renowned for the consistent use of locally quarried Bath Stone, which creates a distinctive visual unity across its streets, terraces, crescents, and public spaces. This architectural composition is exemplified by the elegant Georgian town planning of the eighteenth century, including grand terraces, sweeping crescents, formal squares, and carefully designed streetscapes that reflect the principles of classical architecture. Equally important is Bath's dramatic topographical setting within a natural bowl of surrounding hills, which allows for extensive views both into and out of the city. The close relationship between the built environment and the green hillsides creates a series of memorable panoramas and townscape vistas, contributing to the city's unique sense of place and establishing the iconic visual character for which Bath is internationally recognised

5.108 The importance of this asset is therefore **high**.

Contribution of setting

5.109 The main elements of the conservation area's setting which contribute to its significance include those which help better understand the historic development of the city of Bath. The city of Bath sits within a valley with green hills rising above it and this distinctive topography is one of the key characteristics which has influenced the development of Bath. Despite a large amount of expansion since the original Roman settlement core beside the River Avon, the settlement has retained a strong relationship with its surrounding landscape and the green hillsides surrounding the city are visible within numerous views from across the Bath Conservation Area. These views of the conservation area and its setting contribute strongly to its aesthetic value and would be considered key views.

5.110 Other key elements of the setting of the conservation area includes other historic associations which relate to key periods throughout the settlement's development, most notably those relating to the Roman and Georgian periods. These could include archaeological site such as Roman villas which provide an improvement understanding of the wider Roman landscape to which Bath belonged. Georgian site could include notable buildings, walks or rides which reflect an

intention for the enjoyment of the natural landscape and appreciation of its picturesque qualities.

5.111 Key routes into and out of the city are also an important element of the asset's setting as they reflect the intended historic approach to the settlement. These routes include Roman roads, such as the Fosse Way, which were strategically important for the siting of the original settlement. They also include the later roads, with the main method for travelling to Bath during the Georgian period was by road and in most cases provided visitors with their first glimpse of the city. Another key access route to the city of Bath was the Kennet and Avon Canal, which was possible from Bristol from 1727 and from London from 1810. The expansion of the canal is part of the Georgian town planning of Bath and therefore also contributes to the significance of the conservation area.

Contribution of the Site to asset's significance

5.112 The Site is located c.50m east of the asset.

5.113 The Site currently comprises the Hampset Cricket Club which was first founded in 1940. While the Site forms part of the wider surroundings of Bath Conservation Area its function as a cricket club has no direct functional or historic relationship with the asset. Additionally, due to intervening vegetation and built form there is very limited intervisibility between the Site and the conservation area. Therefore, while located in close proximity to the conservation area the Site currently makes only a very limited contribution to the significance of the asset.

Sensitivity to development of the Site

5.114 The sensitivity of Bath Conservation Area to the proposals is **medium**.

5.115 The Site's location within close proximity to the designated area means it is sensitive to development. This sensitivity is significantly reduced by the intervening development and vegetation between the asset and the Site which limits the contribution the Site makes to the significance of the asset

Potential for harm to the asset

5.116 Due to the intervening development between the asset and the Site does not allow for the understanding, appreciation or experience of heritage value of the asset. There is limited intervisibility between the Site and the asset, and while the development of the Site may introduce further building roofs into views looking west

from the part of the conservation area extending down Bloomfield Road, these would be glimpsed views experienced within the context of existing mid-20th century residential development. While the Site does not currently form a key element of the asset's setting, it remains in a sensitive location due to its location within and adjacent to the designated area and therefore there is still some potential that new development could result in harm to the asset. The potential for harm to the asset as a result of the proposals is **medium**.

Level of effect

5.117 Setting effects to designated heritage assets within the Site would likely result in a **low** level of effect, which would likely equate to **less than substantial harm** or **no harm** to the asset.

Production Quarter

Site description

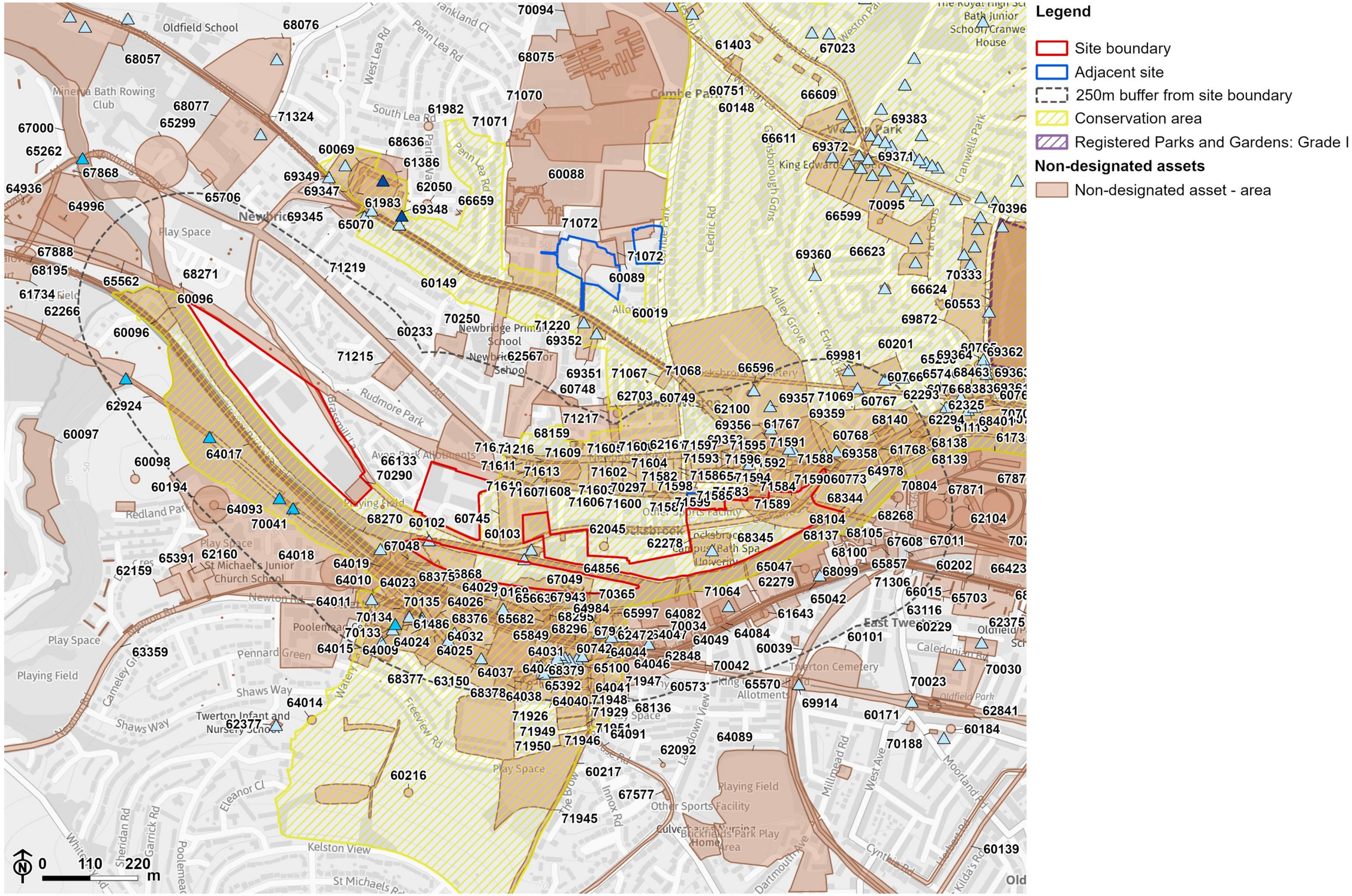
5.118 The Site is located to the west of Bath city centre, mostly running along Brassmill Lane to the north of the part of the River Avon. The land is currently largely used for industrial purposes including several industrial estates such as the Locksbrook Road Trading Estate and the Brassmill Lane Trading Estate. The Site is bounded to south by the River Avon, the end of Locksbrook Road to the west and the end of Brassmill Lane to the east. Running alongside the southern bank of the river is the A36, and to the south of this is the Bristol-London rail line. To the north of the Site is the area of Lower Weston, with the main road through the settlement area being the A4, which runs to the north of the Site into the centre of Bath.

5.119 The Site can broadly be split into four zones: West Production Quarter, Central Production Quarter, East Production Quarter and Weston Island. The West Production Quarter covers the area currently containing the Brassmill Trading Estate, accessed from the adjacent Brassmill Lane. This area includes several plots containing mostly 2-storey structures with areas of surface parking also included. The Central Production Quarter contains further industrial estate activity including the Locksbrook Road Trading Estate as well as rows of Victorian terraced cottages running roughly north-south along Osborne Road and Avondale Road. The East Production Quarter contains the Bath Spa University Locksbrook Campus and several further modern industrial estate units. Weston Island is a small island in the centre of the Site within the River Avon, which currently functions as a bus depot with vehicle access from the southern bank of the river and pedestrian access from the northern bank.

5.120 Due to the size of the Site and the high density of non-designated heritage assets recorded within the area, the assessment of archaeological potential and physical effects to assets within the Site has been divided into the four zones identified above (West Production Quarter, Central Production Quarter, East Production Quarter and Weston Island). The assessment of effects to designated heritage assets has been conducted through assessing the Site as a whole.

5.121 The Site, designated assets and non-designated assets are shown on **Figure 5.5.**

Figure 5.5: Production Quarter



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Designated heritage assets within the Site

5.122 There are six designated heritage assets within the Site:

- City of Bath WHS
- Bath Conservation Area
- Dolphin Inn (grade II listed building, NHLE Ref. 1394802)
- Dolphin Canal Bridge (grade II listed building, NHLE Ref. 1395658)
- Herman Miller Factory (grade II listed building, NHLE Ref. 1415261)
- Weston Lock (grade II listed building, NHLE Ref. 1395660)

Interactions with WHS

5.123 The Site is located within the western part of the City of Bath World Heritage site.

5.124 The East of the Site contains a possible Roman settlement, this would contribute to the WHS's OUV as it fits the characteristic of "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" identified within the Management Plan. This possible Roman settlement activity is recorded within the B&NES HER from a high quantity of finds within a borehole survey, but to fully understand its contribution to the WHS the extent and nature of any settlement activity would have to be determined. If the development of the Site removed, truncated or destroyed Roman and Iron Age archaeological remains this would affect the OUV of the WHS. Therefore, this would result in a **high** level of harm, and a **high** effect.

5.125 The Site also contains part of the Kennet and Avon Canal. This canal and its associated features have been identified as an element which contribute to the WHS's OUV as part of the Georgian town planning of Bath. Part of the canal runs through the south of the Site, framing Weston Island to the north and south and associated features are also recorded including the Grade II listed Weston lock (NHLE Ref. 1395660). If the development of the Site affected the canal or any of its associated infrastructure this would affect the OUV of the WHS. Therefore, this would result in a **high** level of harm, and a **high** effect.

5.126 The remainder of the Site is largely modern industrial estate activity with some areas of late Victorian housing, these are not elements which have been identified as contributing to the OUV of the WHS.

Bath Conservation Area and associated listed buildings (NHLE Refs. 1394802, 1395658, 1415261, 1395660)

Summary

5.127 Bath Conservation Area was designated in 1968 as six separate areas then enlarged and combined as a single area in 1973. The Site is located within the Brassmill Lane, Locksbrook and Western Riverside character area. This character area covers a narrow, mostly linear area of Bath which is largely dictated by the course of the River Avon. It runs from Churchill Bridge in a broadly S-shaped curve to a point near the junction of Lower Bristol Road and Newbridge Road. It is of a largely industrial or transport character with scattered late Georgian buildings along major roads that were constructed as the city of Bath expanded westwards. There are also several areas containing good examples of late Victorian housing.

5.128 The four listed buildings located within the Site are mostly representative of the general industrial and transport character of the Brassmill Lane, Locksbrook and Western Riverside character area. The Herman Miller Factory (NHLE Ref. 1415261) is late 20th century building, constructed between 1976-7, designed by the notable contemporary architect Nicholas Grimshaw and is an example of the British High Tech architectural movement. Two of the listed buildings relate to the function of the canal along which the Site runs, the Dolphin Canal Bridge (NHLE Ref. 1395658) and Weston Lock (NHLE Ref. 1395660), both were constructed between 1727-8 shortly after this section of the Avon Navigation was opened. The fourth listed building is not of an industrial or transport character and comprises the Dolphin Public House, constructed in early 18th century with later 19th and 20th century additions and modifications. While not of a directly industrial or transport function, the original early 18th century date of the pub suggests its construction was likely related to the opening of the canal.

Table 5.8: Bath Conservation Area and associated listed buildings summary table

Importance	Type of change	Sensitivity	Risk of harm	Level of effect
High	Physical	High	High	High
High	Physical	High	High	Substantial Harm
High	Setting change	High	High	Medium
High	Setting change	High	High	Less than substantial harm

Significance

5.129 The significance of Bath Conservation Area and its associated listed buildings is drawn from the following values:

- **Evidential value:** Bath Conservation Area derives its evidential value from both its exceptional archaeological resource and the survival of its historic built fabric. Beneath the modern city lies a remarkably well-preserved archaeological record spanning over two millennia, including internationally significant remains associated with the Roman baths, sacred thermal springs, temple complex, and wider settlement. These buried deposits provide invaluable evidence for understanding the development of Bath from the Roman period onwards. Above ground, the widespread use of locally quarried oolitic Bath Stone preserves a tangible record of the city's architectural evolution, craftsmanship, and construction techniques. The survival of buildings and structures from the medieval, Georgian, Victorian, and later periods enables the study of changing architectural styles, urban planning principles, and engineering practices, contributing substantially to our understanding of Bath's historic development and cultural significance.
- **Historical value:** The historical value of the Bath Conservation Area lies in its exceptional ability to illustrate the city's evolution from a Roman spa settlement into one of the most celebrated social, cultural, and therapeutic centres of the Georgian period. The historic townscape preserves the results of ambitious eighteenth-century urban planning, exemplified by internationally renowned developments such as the Circus, Royal Crescent, and Queen Square, which

demonstrate innovative approaches to architectural design, speculative development, and the creation of a cohesive urban environment. The city's streets, buildings, and public spaces provide a tangible record of Bath's prominence as a fashionable destination for health, leisure, and society during the eighteenth and nineteenth centuries. The Conservation Area also retains strong associations with influential figures including Jane Austen, Beau Nash, and architects John Wood the Elder and John Wood the Younger, whose contributions helped shape Bath's distinctive character and enduring cultural significance.

- **Aesthetic value:** The aesthetic value of the Bath Conservation Area derives from the exceptional coherence of its historic townscape and its harmonious integration with the surrounding landscape. The city is renowned for the consistent use of locally quarried Bath Stone, which creates a distinctive visual unity across its streets, terraces, crescents, and public spaces. This architectural composition is exemplified by the elegant Georgian town planning of the eighteenth century, including grand terraces, sweeping crescents, formal squares, and carefully designed streetscapes that reflect the principles of classical architecture. Equally important is Bath's dramatic topographical setting within a natural bowl of surrounding hills, which allows for extensive views both into and out of the city. The close relationship between the built environment and the green hillsides creates a series of memorable panoramas and townscape vistas, contributing to the city's unique sense of place and establishing the iconic visual character for which Bath is internationally recognised.

5.130 The importance of this asset is therefore **high**.

Contribution of setting

5.131 The main elements of the conservation area's setting which contribute to its significance include those which help better understand the historic development of the city of Bath. The city of Bath sits within a valley with green hills rising above it and this distinctive topography is one of the key characteristics which has influenced the development of Bath. Despite a large amount of expansion since the original Roman settlement core beside the River Avon, the settlement has retained a strong relationship with its surrounding landscape and the green hillsides surrounding the city are visible within numerous views from across the Bath Conservation Area. These views of the conservation area and its setting contribute strongly to its aesthetic value and would be considered key views.

5.132 Other key elements of the setting of the conservation area includes other historic associations which relate to key periods throughout the settlement's development, most notably those relating to the Roman and Georgian periods. These could include archaeological site such as Roman villas which provide an improvement understanding of the wider Roman landscape to which Bath belonged. Georgian site could include notable buildings, walks or rides which reflect an intention for the enjoyment of the natural landscape and appreciation of its picturesque qualities.

5.133 Key routes into and out of the city are also an important element of the asset's setting as they reflect the intended historic approach to the settlement. These routes include Roman roads, such as the Fosse Way, which were strategically important for the siting of the original settlement. They also include the later roads, with the main method for travelling to Bath during the Georgian period was by road and in most cases provided visitors with their first glimpse of the city. Another key access route to the city of Bath was the Kennet and Avon Canal, which was possible from Bristol from 1727 and from London from 1810. The expansion of the canal is part of the Georgian town planning of Bath and therefore also contributes to the significance of the conservation area.

Contribution of the Site to asset's significance

5.134 The Site is located within the western part of the Bath Conservation Area. The Conservation Area derives significance primarily from its historical and architectural interest due to the historic buildings within its boundaries that make up the city of Bath. The Site also contains possible archaeological remains from the Roman period relating to settlement activity (HER Ref. 68345) which also gives the area evidential value.

5.135 The Site is located within the Brassmill Lane, Locksbrook and Western Riverside character area. The draft character area appraisal identifies the special interest of the area comprising largely its transport and industrial associations, with scattered late Georgian buildings along major roads demonstrating the city's expansion, and high quality late Victorian housing. The Site contains some of these characteristics, with the transport feature of the Kennet and Avon canal passing through its southern extent, the industrial buildings within its boundaries and the occasional late Victorian building.

5.136 The following paragraphs summarise elements within the Site which have been identified as important by the character area appraisal.

5.137 Several key buildings have been identified within character area appraisal as contributing to the significance of the conservation area. Those within the Site include:

- Herman Miller factory, Locksbrook Road (grade II listed building);
- Dolphin Inn, Locksbrook Road (grade II listed building);
- Dolphin Bridge, Weston Cut (grade II listed building);
- Lock gates, Weston Cut (grade II listed building);
- Red House, corner of Station Road (Non-designated building of merit)
- Former Weston Railway Station, Ashley Avenue (Non-designated building of merit); and
- Rotork Building, Brassmill Lane (Non-designated building of merit)

5.138 The character area appraisal also identified key views across the conservation area which allow for the understanding and appreciation of its special interest and heritage significance. Identified key views which include the Site are:

- Southwards down the terraces along Osborne Road and Avondale Road
- Panoramic views across the green space of Brassmill Lane Park
- Southwards down Station Road towards the canal
- South-west down Ashley Avenue towards the canal

5.139 While there are elements of the Site which make a positive contribution to the heritage significance and special character of the assets, the appraisal also identifies several negative buildings and townscape features which detract from the ability to understand, appreciate and experience the conservation area and its associated listed buildings. Those identified within the Site include:

- Commercial sheds, east end of Locksbrook Road (including Horstman building, Speedy Services, B&NES Environmental Services depot, Plumb Centre)
- Locksbrook Road Trading Estate
- Commercial sheds east and north of Dolphin Inn, Locksbrook Road
- Brassmill Lane Trading Estate
- Bus depot, Weston Island

5.140 Therefore, while elements of the Site do make a direct contribution to the heritage significance of the assets, there is also much of the Site which does not contribute to the significance of these assets.

Sensitivity to development of the Site

5.141 The sensitivity of the conservation area and listed buildings to development within the Site is **high**.

5.142 Much of the Site provides limited contribution to the significance of these assets through their setting due to the character of the area largely comprising a modern industrial estate. However, these assets' location within the Site and their potential to experience physical effects as a result of any development within the Site, significantly increases their sensitivity.

Potential for harm to the asset

5.143 There is potential for harm to these assets a result of both physical effects and effects resulting from changes to their setting.

5.144 Although there are several listed and unlisted buildings within the Site which are considered to contribute to the area's special character and historic significance, much of the Site has been identified as being a negative contribution to the conservation area due to the current buildings occupying the land.

5.145 As a consequence of the negative features currently within the Site, the appraisal highlights the potential opportunities for the enhancement of the conservation area which would improve the ability to understand, appreciate and experience its heritage significance as well as the heritage significance of its associated listed buildings. These opportunities include the redevelopment Site across the character area creating new high quality architectural designs. Weston Island specifically is identified due to its potential to offer an attractive riverside environment, which is presently underutilised due to its main function as a bus depot.

5.146 Therefore, although there is a **high** potential for harm to these assets due to the potential for both physical and setting effects resulting from new development activity, there is also potential for beneficial effects to the assets which would enhance the space and provide better opportunities to understand, appreciate and experience the heritage value of the area.

Level of effect

5.147 The development of the Site could result in physical effects to the designated heritage assets within it, and the Bath Conservation Area. This would result in a **high** level of effect to these assets, which would likely equate to **substantial harm**.

5.148 Setting to effects to designated heritage assets within the Site and the Bath Conservation Area would likely result in a **medium** level of effect, which would likely equate to **less than substantial harm.**

5.149 These levels of effect could be significantly reduced through sensitive development design and the avoidance of physical effects to historic buildings within the conservation area.

Non-designated heritage assets

5.150 Due to the size of the Site and the high density of non-designated heritage assets recorded within the area, the assessment of archaeological potential and physical effects to assets within the Site has been divided into the four zones identified above (West Production Quarter, Central Production Quarter, East Production Quarter and Weston Island).

West Production Quarter

5.151 There are two non-designated heritage assets recorded within the West Production Quarter zone. These are identified in the table below:

Table 5.9: Non-designated heritage assets within West Production Quarter

Name	B&NES HER Ref.	Description	Heritage Importance
Rotork Building, Brassmill Lane, Bath	70290	Building of merit identified in Brassmill, Locksbrook and Western Riverside character appraisal for its innovative commercial architecture	Medium
18th-and 19th-century turnpike road, Newbridge Road and	60233	Turnpike road linking Upper and Lower Bristol Roads	Low

Name	B&NES HER Ref.	Description	Heritage Importance
Brassmill Lane, Newbridge			

Central Production Quarter

5.152 There are four non-designated heritage assets recorded within the Central Production Quarter zone. These are identified in the table below:

Table 5.10: Non-designated heritage assets within Central Production Quarter

Name	B&NES HER Ref.	Description	Heritage Importance
Cement Works, Locksbrook Road, Bath	60745	Cement works with at least five lime kilns, disused by 1903. Also had associated quarrying activity to the west and a clay mill.	Low
Gospel Hall, Locksbrook Road, Bath	60738	Visible on 1888 OS map but seems to have fallen out of use following the construction of the new Upper Gospel Hall to the east (visible on 1903 map) which is still extant as The Church of Jesus Christ of Latter-day Saints.	Low
Lock House, Brassmill Lane, Bath	60744	Visible on maps and illustrations from 1846 onwards, possibly built c.1830, still extant.	Low
18th-and 19th-century turnpike road, Newbridge Road and Brassmill Lane,	60233	Turnpike road linking Upper and Lower Bristol Roads	Low

Name	B&NES HER Ref.	Description	Heritage Importance
Newbridge, Weston			

East Production Quarter

5.153 There are six non-designated heritage assets recorded within the East Production Quarter zone. These are identified in the table below:

Table 5.11: Non-designated heritage assets within East Production Quarter

Name	B&NES HER Ref.	Description	Heritage Importance
Roman settlement S of Locksbridge Road, Weston, Bath	68345	An area of possible Roman settlement activity recorded from a high concertation of finds found during borehole survey. Finds included samian, a leather trap, animal bone, mussel shells. It is possible these finds could originate from activity higher up the valley and have been washed downhill. The survival of this high number of finds below the modern road surface indicates a good level of preservation for any possible settlement activity despite the modern development currently occupying the area.	Medium-High
Midland Railway, Bath to	66133	Opened c.1869, used for passengers until 1966 and coal until 1971.	Low

Name	B&NES HER Ref.	Description	Heritage Importance
Mangotsfield branch line			
Windsor Railway Bridge, Locksbrook, Bath	60772	Iron panel bridge for Midland Railway line, although track and embankment at each end of the bridge were removed following the closure of the line the bridge remains extant.	Low
Weston Station (Midland Railway), Station Road, Weston, Bath	60735	Former railway station. Non-designated building of merit identified in Brassmill Locksbrook and Western Riverside character appraisal.	Medium
18th-and 19th-century turnpike road, Newbridge Road and Brassmill Lane, Newbridge, Weston	60233	Turnpike road linking Upper and Lower Bristol Roads. This section of the route was partly altered to accommodate the railway.	Low
16 Station Road, Locksbrook, Bath	71587	Late Victorian house. Non-designated building of merit identified in Brassmill Locksbrook and Western Riverside character appraisal.	Medium

Weston Island

5.154 There are six non-designated heritage assets recorded within the Weston Island zone. These are identified in the table below:

Table 5.12: Non-designated heritage assets within Weston Island

Name	B&NES HER Ref.	Description	Heritage Importance
River Avon Navigation, Bath to Hanham Mills	67000	In 1727 the River Avon was subject to navigation improvements with six locks added in the 11.5 miles from Hanham to Bath and in 1796 the control of the canalised river passed to the Kennet and Avon Canal	Medium-High
Weston Canal (or Weston Cut), Weston Island, Bath	60103	A stretch of the Avon Navigation constructed in 1727-8, with the canal cut to the north of the river to bypass the two weirs to the south and formed Weston Island, previously known as Dutch Island after the brass mill established on the river side.	Medium-High
Weston Upper Mill, Weston Island (or Dutch Island), Bath	61744	The Upper Mill was in use during the 15th century as a fulling mill and by the 18th century was converted to a brass mill by the Bristol Brass Company. Possibly originally on the Site of the 13th century cornmill associated with Bath Abbey known to be on this side of the river, alternative Site is at Lower Mill.	Low
Weston Lower Mill, Weston Island (or Dutch Island), Bath	61743	The Lower Mill was in use a paper mill in the 18th century before being	Low

Name	B&NES HER Ref.	Description	Heritage Importance
		used as a broadcloth and flour mill during the 19th century. Possibly originally on the Site of the 13th century cornmill associated with Bath Abbey known to be on this side of the river, alternative Site is at Upper Mill.	
Twerton Upper Weir, Twerton Upper Mill, Bath; Twerton Lower Weir, Twerton Lower Mill, Bath	67049; 67048	No longer extant, former weirs spanning the Avon between Weston Mills ad Twerton Upper Mills. The weirs were possibly established originally as fords during the Saxon period, they are first visible on 18th century map but were removed as part of the Bath Flood Defence Scheme in 1972	Low

Archaeological potential

West Production Quarter

5.155 One previous archaeological investigation has been undertaken within the West Production Quarter zone. This comprised a watching brief in 2000-1 monitoring the excavation eight boreholes and five trial pits as part of a wider project which had locations along the Avon Valley floor in advance of proposed storm overflow scheme. Most locations only produced post-medieval finds (HER Ref. 64936).

5.156 Two possible areas of prehistoric occupation have been recorded to the west of the Site, one a ring ditch and other features identified from a geophysical survey c.420m west from the Site (HER Ref. 67889), the other a possible hillfort from field name evidence c.270m from the Site (HER Ref. 60098). A possible Iron Age

routeway runs to the south of the hillfort c.350m south-west of the Site (HER Ref. 63359), also suggesting evidence of prehistoric activity within the landscape

5.157 Two possible Roman roads run to the north and south of the Site towards Bath (HER Refs. 60149, 67021) but no further Roman activity has been recorded in the area surrounding this zone of the Site.

5.158 Medieval activity recorded within the surrounding area is focused on the of Twerton to the south of the river (HER Ref. 60573), which was a Saxon settlement divided between two manors.

5.159 The remaining activity within the surrounding area comprises largely post-medieval settlement activity relating to the development of Twerton to the south of the river or the growing industrial activity which began to spread around the area from the 18th century onward, such as an 18th century coal wharf along the river Avon immediately west of the Site (HER Ref. 60096). A large area to the west of the river near the Site included the Wood House and gardens (HER Ref. 63151), laid out in the c.1830s for the Twerton mill owner Charles Wilkins, the land was redeveloped with council housing from the 1950s and Wood House was demolished in 1965.

5.160 While there is evidence of activity from the prehistoric and Roman periods within the wider area there is no current evidence to suggest this activity extends into the Site. However, this lack of evidence could be partially as a result of the limited previous archaeological investigations that have been undertaken within the Site and surrounding area rather than due to a lack of activity during these periods. However, from current evidence suggests during the medieval period the Site has formed agricultural land surrounding the known settlements within the area, before becoming industrialised during the post-medieval period as the city of Bath expanded westwards. The industrialisation of the Site and the current modern development which occupies the Site has likely resulted in the truncation or removal of any potential earlier archaeological remains within the Site. Therefore, the overall the archaeological potential of this zone of the Site is **low**.

Central Production Quarter

5.161 One previous archaeological investigation has been recorded within the Site. This is part of the watching brief conducted in 2004-5 for the Bath water mains rehabilitation project (HER Ref. 65070). This section of the watching briefing included the excavation of several access pits, but no archaeological features or deposits were recorded within the Site.

5.162 Limited evidence of prehistoric activity has been recorded within the area surrounding the Central Production Quarter zone. A findspot of a Bronze Age palstave is recorded to the south of the Site in Twerton (HER Ref. 66868) but no further activity has been recorded within the surrounding area.

5.163 The main area of Roman activity appears to be around the possible settlement within the East Production Quarter (HER Ref. 68345) and cemetery to the east of this activity (HER Ref. 61767). Scattered findspots have been found elsewhere (HER Refs. 62045, 62092, 62703) and two possible roads run through the area towards the Roman centre at Bath, including one possible route along the modern Lower Bristol Road/A36 (HER Ref. 67021).

5.164 Similarly to the West Production Quarter zone, medieval activity recorded within surrounding this zone is focused on the of Twerton to the south of the river (HER Ref. 60573).

5.165 The remaining activity within the surrounding area comprises largely post-medieval settlement activity relating to the development of Twerton to the south of the river or the growing industrial activity which began to spread around the area from the 18th century onward. Including the area immediately north of the Site around Locksbrook Road and Clarence Place which have been depicted as rows of houses since the 1888 OS map.

5.166 While there is evidence of activity from the prehistoric and Roman periods within the wider area there is no current evidence to suggest this activity extends into the Site. However this lack of evidence could be partially as a result of the limited previous archaeological investigations that have been undertaken within the Site and surrounding area rather than due to a lack of activity during these periods.

5.167 Current evidence suggests during the medieval period the Site has formed agricultural land surrounding the known settlements within the area, before becoming industrialised during the post-medieval period as the city of Bath expanded westwards. Any remains relating to these periods would likely represent the agricultural character of the landscape prior to development or would comprise the remains of post-medieval buildings which occupied the area before the current development within the Site. Such remains have limited evidential value and would be of **low** heritage importance.

5.168 The industrialisation of the Site and the current modern development which occupies the Site has likely resulted in the truncation or removal of any potential earlier archaeological remains within the Site. Therefore the overall the archaeological potential of this zone of the Site is **low**.

East Production Quarter

5.169 One previous archaeological investigation has been recorded within the Site. Borehole logging in 2000 at Locksbridge Road (HER Ref. 68344) recorded boreholes up to 3.8m below ground level and within the lower layers a high concentration of Roman finds were recorded. The probable remains of the railway embankment were recorded c.17.9m AOD.

5.170 While no further previous investigations have been recorded within the Site, Several watching briefs have been recorded immediately south of the Site, to the north A36/Lower Bristol Road (HER Refs. 65344, 65107, 68104). These investigations did not recorded any archaeological features or deposits.

5.171 Some limited evidence for prehistoric activity has been recorded within close proximity to the Site. Palaeolithic faunal remains at Locksbrook, Bath have been recorded c.40m west of Site (HER Ref. 70297), although the precise location that these remains were found is uncertain. A Bronze Age sword findspot was recorded at Twerton near a gasometer (HER Ref. 62104), however the exact location of this antiquarian findspot is uncertain although it was likely somewhere near the Bath Gas Works c.100m east of the Site.

5.172 Roman activity within close proximity to the Site is mainly concentrated around the cemetery at Newbridge Hill/Upper Bristol Road (HER Ref. 71069) with numerous burials found in this area (HER Refs. 61768, 61767, 68140). This activity could relate to possible settlement recorded within the Site (HER Ref. 68345), which itself is likely related to the two possible Roman roads which run through the area towards the Roman centre of Bath (HER Refs. 60149, 67021).

5.173 As with the West and Central Production Quarter zones, medieval activity in the surrounding area is focused around the village of Twerton (HER Ref. 60573). Post-medieval activity largely relates to the development or Twerton or the industrial expansion of Bath from the 18th century onwards.

5.174 There is limited evidence of prehistoric activity recorded within the surrounding area suggesting a **low** potential for remains of this date within the Site. However this lack of evidence could be partially as a result of the limited previous archaeological investigations that have been undertaken within the Site and surrounding area rather than due to a lack of activity during these periods.

5.175 There is a **high** potential for Roman remains to be found within the Site. The presence of possible Roman settlement activity has been recorded within the east of this zone, with a further Roman cemetery recorded immediately north-east of the Site. This suggests that despite the modern development activity currently occupying

the Site there is high potential for Roman remains to be present below this development activity. It is likely that any such remains have been significant truncated by the later development activity. This would lower their evidential value, however the Site is located within the City of Bath WHS and therefore any Roman remains within the WHS area have been identified as forming part of the OUV of the WHS and as such have the potential to be of **medium-high** heritage importance.

5.176 From current evidence suggests during the medieval period the Site has formed agricultural land surrounding the known settlements within the area, before becoming industrialised during the post-medieval period as the city of Bath expanded westwards. Any remains relating to these periods would likely represent the agricultural character of the landscape prior to development or would comprise the remains of post-medieval buildings which occupied the area before the current development within the Site. Such remains have limited evidential value and would be **low** heritage importance.

Weston Island

5.177 One previous archaeological investigation has been recorded within the Site. Three trenches were excavated in 1999 but no evidence of archaeological remans was recorded (HER Ref. 64856).

5.178 Some limited evidence for prehistoric activity has been recorded within close proximity to the Site. Palaeolithic faunal remains at Locksbrook, Bath have been recorded c.190m north-west of Site (HER Ref. 70297), although the precise location that these remains were found is uncertain. A findspot of a Bronze Age palstave is recorded to the south of the Site in Twerton (HER Ref. 66868) but no further activity has been recorded within the surrounding area.

5.179 The main area of Roman activity appears to be around the possible settlement within the East Production Quarter (HER Ref. 68345) and cemetery to the east of this activity (HER Ref. 61767). Two possible roads run through the area near the Site towards the Roman centre at Bath (HER Refs. 60217, 67021).

5.180 As with the West and Central Production Quarter zones, medieval activity in the surrounding area is focused around the village of Twerton (HER Ref. 60573). A medieval road has also been recorded along Sheephouse Lane (HER Ref. 64091) leading towards the settlement from the south. Post-medieval activity largely relates to the development or Twerton or the industrial expansion of Bath from the 18th century onwards. The Weston Island was separated from the surrounding area during the construction of the West canal cut in the 18th century, prior to which it was part of the norther riverbank for the River Avon.

5.181 While there is evidence of activity from the prehistoric and Roman periods within the wider area there is no current evidence to suggest this activity extends into the Site. However this lack of evidence could be partially as a result of the limited previous archaeological investigations that have been undertaken within the Site and surrounding area rather than due to a lack of activity during these periods.

5.182 Current evidence suggests during the medieval period the Site has formed agricultural land surrounding the known settlements within the area, before becoming industrialised during the post-medieval period as the city of Bath expanded westwards. Any remains relating to these periods would likely represent the agricultural character of the landscape prior to development or would comprise the remains of post-medieval buildings which occupied the area before the current development within the Site. Such remains have limited evidential value and would be of low heritage importance.

5.183 The industrialisation of the Site and the current modern development which occupies the Site has likely resulted in the truncation or removal of any potential earlier archaeological remains within the Site. Therefore the overall the archaeological potential of this zone of the Site is **low**.

Historic landscape character

5.184 The historic landscape character of the majority of the Site is recorded as large scale utility landscapes, with a small area of 19th century 'extended' or 'infill' along Osborne Road and Avondale Road.

Heritage assets with the potential to experience setting change

5.185 The Bath Conservation Area and its associated listed buildings are the only heritage assets within the Site's surroundings which have been identified as being potentially sensitive to development as a result of changes to their setting. The potential for harm to these assets has been assessed above. This assessment found there to be a high potential for harm to these assets as the proposals will result in changes to a large part of their immediate surroundings and therefore there is potential for a high level of effect these assets. However the Site currently comprises an area which is identified as a negative contribution to overall historic value of the Brassmill Lane, Locksbrook and Western Riverside character area of the Bath Conservation Area. Therefore while there is a high potential for harm to these assets due to the Site's location, there is also potential for beneficial effects to the assets if the proposed development design could replace these assets with more sensitive development activity.

Kingswood Playing Fields

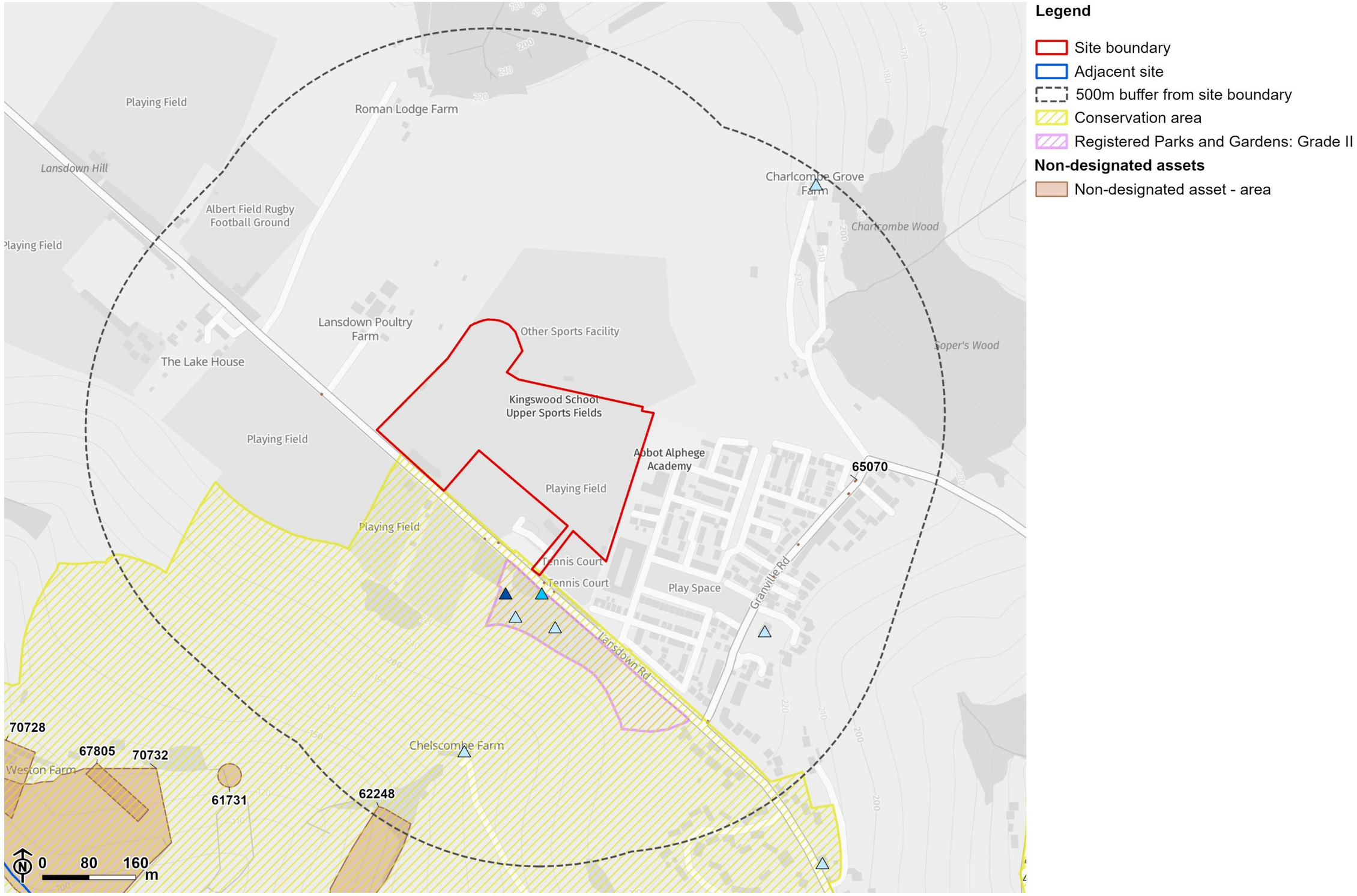
Baseline

5.186 The Site currently largely comprises playing fields to the north of Kingswood School. Within the north-west of the Site is a running track and a pavilion building is located within the south-eastern corner of the Site. The Site lies on the northern edge of the city of Bath, on the Lansdown plateau to the north of Lansdown Road. The existing Ensleigh residential development is located immediately to the west of the Site, on the Site of the former Ensleigh MoD. To the south of the Site is the Lansdown Cemetery and further playing fields are located to the south-west and within the field immediately north of the Site. The area immediately west of the Site comprises the Lansdown Poultry Farm.

5.187 The playing fields within the Site are proposed to be relocated to ensure no net loss of existing facilities. This assessment includes only the area within the Site boundary and effects as a result of the addition of playing fields elsewhere within the landscape have not been included.

5.188 The Site, designated assets and non-designated assets are shown on **Figure 5.6.**

Figure 5.6: Kingswood Playing Fields



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Designated heritage assets within the Site

5.189 The Site is located within the City of Bath World Heritage site.

5.190 No other designated heritage assets have been identified within the Site.

Interactions with WHS

5.191 The Site is located within the northernmost part of the City of Bath World Heritage site. Historically, the Site has formed part of the rural surroundings of Bath and therefore contributes to the OUV of the World Heritage site as part of the "green setting of the city in a hollow in the hills" attribute identified in the WHS management plan.

5.192 However, whilst broadly contributing to the wider "green" setting of the city, the Site does not form part of any of the specific elements which contribute to this attribute of the OUV as assessed in the management plan due to its location on the central area of the plateau at the base of the green hills that surround the northern part of the city, and its current use as playing fields and running track.

5.193 The setting study (B&NES 2012) also identifies the northern fringe of the WHS, which is located immediately north of the Site, as sensitive to development that could affect key views and the tranquil character of the WHS setting, especially in relation to Beckford’s Tower.

5.194 The Site's location within a central area of the plateau (i.e. not close to the plateau edges) and the screening provided by trees, topography and built form to the south and west, means that it cannot be seen or experienced from within the city of Bath itself. The Site is also not visible in key viewpoints identified in the setting study to the north of the city. This lack of intervisibility includes from the viewpoint at Beckford's Tower, for which the key views relating to the WHS are those to the south/south-west, rather than those towards the north where the Site is located.

5.195 The Site is clearly in a sensitive location as part of the WHS and development within the Site would change this part of the WHS. However, it is likely that this change would be imperceptible when viewing the significance of the WHS as a whole. The location of the Site and screening provided by intervening vegetation and built form minimises the development of the Site’s ability to affect OUV.

5.196 This would create a **low** level of harm, and a **low** effect.

Non-designated heritage assets

5.197 There is one non-designated heritage asset recorded within the Site by B&NES HER. This is identified in the table below:

Table 5.13: Non-designated heritage assets within the Site

Name	B&NES HER Ref	Description	Heritage Importance
Second World War slit trenches, Kingswood School Upper Sports Fields, Lansdown Road, Lansdown	63487	Several slit trenches have been previously identified on aerial photographs, these likely relate to the presence of the World War II MOD activity at Ensleigh immediately to the east of the Site	Low

Archaeological potential

5.198 No previous archaeological investigations have been recorded within the Site.

5.199 However, three previous investigations have been recorded within the fields immediately to the east of the Site prior to the construction of the modern Ensleigh residential development:

- An archaeological evaluation was conducted in 2015 within the former MOD Ensleigh (HER Ref. 65955). A total of 16 trenches were excavated but no archaeological features/deposits were recorded
- A geophysical survey was conducted in 2015 at Royal High School playing fields. This survey identified linear and discrete anomalies, although these were largely determined to be natural in origin (HER Ref. 65891).
- An evaluation was undertaken in 2016 at Royal High School playing fields following the geophysical survey. This investigation excavated two trenches and found no archaeological features/deposits (HER Ref. 66078).

5.200 Prehistoric and Roman activity has been recorded within the areas surrounding the Site. This includes:

- Three Bronze Age round barrows have been recorded in fields south-west of the Site (HER Refs. 61391, 62628, 62629):

- Bronze Age bowl barrow (Lansdown 11), Playing Field, Lansdown Road, Charlcombe (HER Ref. 61391): The barrow was excavated in 1909 and is recorded to have contained 27 cremations and one inhumation, however it has subsequently been damaged by ploughing and no above ground evidence of the asset remain visible.
- Bronze Age bowl barrow, Playing Field, Lansdown Road, Charlcombe (HER Ref. 62628): The barrow was partially excavated in 1955 and one inhumation was recorded. The asset has subsequently been damaged by ploughing and no above ground evidence of the asset remain visible.
- Bronze age barrow, Playing Field, Lansdown Road, Charlcombe (HER Ref. 62629): There is no record of excavation for this barrow and a visit to the asset in 1970 recorded it as being almost levelled
- Findspots of prehistoric flints have been recorded across the fields surrounding Kingswood School over the 20th century, the exact locations of many of these finds is uncertain (61390, 61388, 70489).
- Roman road, Bath to Chavenage Green (63125): the projected line of Roman road marked on historic maps is recorded as following the route of the modern Lansdown Lane, immediately south of the Site.

5.201 Further activity recorded within the area surrounding the Site indicates that it has remained largely undeveloped from the medieval/post-medieval periods onwards. A review of LiDAR imagery shows some possible ridge and furrow cultivation within the Site aligned roughly east/west and north-east/south-west through the Site, although such activity has been disturbed by more modern agricultural or drainage activity.

5.202 Beyond the Site, evidence of post-medieval activity includes the establishment of Lansdown Road as a turnpike road in c.1786-7 (HER Ref. 71213) and the route of Beckford's Ride (HER Ref. 62569), an ornamental/picturesque walk developed by Beckford between c.1822-1844 from his houses at Lansdown Crescent to Beckford's Tower. Some features of this ride survive but it has mostly been disrupted by 20th century development.

5.203 The MOD Ensleigh was located immediately east of the Site (HER Ref. 60203). Temporary offices were constructed at this location in 1942 for admiralty, with single storey hutments constructed with air raid shelters also built as the Site became semi-permanent. The MOD site began to be decommissioned in 2012 and the area is now the Ensleigh residential development.

5.204 The presence of three barrows within the field to the south of the asset, the numerous prehistoric flints around the surrounding fields and indicates some potential for prehistoric archaeological remains to be found within the Site. Archaeological investigations within the fields immediately east of the Site did not record any archaeological features or deposits, suggesting a lower potential. However, this land was previously in use as an MOD development which may have truncated or removed any archaeological remains within its footprint, whereas the Site has remained largely undeveloped. Any such remains would have evidential value as evidence of prehistoric settlement or agricultural activity within the area, but it is unlikely any remains would be of such significance as to be considered of the same value as a scheduled monument. As such it is likely any remains would be of **medium** heritage importance.

5.205 Similarly, the Site is located in close proximity to a possible Roman road, suggesting some potential for archaeological remains of Roman origin. As part of the City of Bath WHS, any Roman remains would contribute to the OUV of the WHS and would therefore have the potential to be of **medium-high** heritage importance.

5.206 There is also a high potential for agricultural remains relating to medieval and post-medieval activity within the Site, with ridge and furrow earthworks visible on LiDAR imagery within the north of the Site. Such remains are a common type found nationally and as such have limited evidential value and would be of **low** heritage importance.

Historic landscape character

5.207 The historic landscape character of the Site is recorded as 18th and 19th century parliamentary enclosure.

Heritage assets with the potential to experience setting change

5.208 The following designated heritage assets have been identified as having the potential to experience effects to significance due to development within the Site as a result of changes to setting:

- Bath Conservation Area
- Beckford's tower with attached wall and railings (grade I, 1394133)
- Lansdown Cemetery and Beckford's Tower Registered Park and Garden, and associated listed buildings including two tombs (grade II, 1394440, 1394443) and entrance gates/piers (grade II* 1394446)

Bath Conservation Area

Summary

5.209 Bath Conservation Area was designated in 1968 as six separate areas then enlarged and combined as a single area in 1973. The designated area covers the current extent of the city of Bath as well as parts of the green landscape surrounding the city which were identified within the Bath City-Wide Character Appraisal (Bath and North East Somerset Planning Services 2005) as contributing "significantly to the setting and character of the city".

Table 5.14: Bath Conservation Area summary table

Importance	Type of change	Sensitivity	Risk of harm	Level of effect
High	Setting change	High	Medium	Low
High	Setting change	High	Medium	Less than substantial harm

Significance

5.210 The significance of Bath Conservation Area is drawn from the following values:

- **Evidential value:** Bath Conservation Area derives its evidential value from both its exceptional archaeological resource and the survival of its historic built fabric. Beneath the modern city lies a remarkably well-preserved archaeological record spanning over two millennia, including internationally significant remains associated with the Roman baths, sacred thermal springs, temple complex, and wider settlement. These buried deposits provide invaluable evidence for understanding the development of Bath from the Roman period onwards. Above ground, the widespread use of locally quarried oolitic Bath Stone preserves a tangible record of the city's architectural evolution, craftsmanship, and construction techniques. The survival of buildings and structures from the medieval, Georgian, Victorian, and later periods enables the study of changing architectural styles, urban planning principles, and engineering practices,

contributing substantially to our understanding of Bath's historic development and cultural significance.

- **Historical value:** The historical value of the Bath Conservation Area lies in its exceptional ability to illustrate the city's evolution from a Roman spa settlement into one of the most celebrated social, cultural, and therapeutic centres of the Georgian period. The historic townscape preserves the results of ambitious eighteenth-century urban planning, exemplified by internationally renowned developments such as the Circus, Royal Crescent, and Queen Square, which demonstrate innovative approaches to architectural design, speculative development, and the creation of a cohesive urban environment. The city's streets, buildings, and public spaces provide a tangible record of Bath's prominence as a fashionable destination for health, leisure, and society during the eighteenth and nineteenth centuries. The Conservation Area also retains strong associations with influential figures including Jane Austen, Beau Nash, and architects John Wood the Elder and John Wood the Younger, whose contributions helped shape Bath's distinctive character and enduring cultural significance.
- **Aesthetic value:** The aesthetic value of the Bath Conservation Area derives from the exceptional coherence of its historic townscape and its harmonious integration with the surrounding landscape. The city is renowned for the consistent use of locally quarried Bath Stone, which creates a distinctive visual unity across its streets, terraces, crescents, and public spaces. This architectural composition is exemplified by the elegant Georgian town planning of the eighteenth century, including grand terraces, sweeping crescents, formal squares, and carefully designed streetscapes that reflect the principles of classical architecture. Equally important is Bath's dramatic topographical setting within a natural bowl of surrounding hills, which allows for extensive views both into and out of the city. The close relationship between the built environment and the green hillsides creates a series of memorable panoramas and townscape vistas, contributing to the city's unique sense of place and establishing the iconic visual character for which Bath is internationally recognised.

5.211 The importance of this asset is therefore **high.**

Contribution of setting

5.212 The main elements of the conservation area's setting which contribute to its significance include those which help better understand the historic development of the city of Bath. The city of Bath sits within a valley with green hills rising above it and

this distinctive topography is one of the key characteristics which has influenced the development of Bath. Despite a large amount of expansion since the original Roman settlement core beside the River Avon, the settlement has retained a strong relationship with its surrounding landscape and the green hillsides surrounding the city are visible within numerous views from across the Bath Conservation Area. These views of the conservation area and its setting contribute strongly to its aesthetic value and would be considered key views.

5.213 Other key elements of the setting of the conservation area includes other historic associations which relate to key periods throughout the settlement's development, most notably those relating to the Roman and Georgian periods. These could include archaeological site such as Roman villas which provide an improvement understanding of the wider Roman landscape to which Bath belonged. Georgian site could include notable buildings, walks or rides which reflect an intention for the enjoyment of the natural landscape and appreciation of its picturesque qualities.

5.214 Key routes into and out of the city are also an important element of the asset's setting as they reflect the intended historic approach to the settlement. These routes include Roman roads, such as the Fosse Way, which were strategically important for the siting of the original settlement. They also include the later roads, with the main method for travelling to Bath during the Georgian period was by road and in most cases provided visitors with their first glimpse of the city. Another key access route to the city of Bath was the Kennet and Avon Canal, which was possible from Bristol from 1727 and from London from 1810. The expansion of the canal is part of the Georgian town planning of Bath and therefore also contributes to the significance of the conservation area.

Contribution of the Site to asset’s significance

5.215 The Site is located immediately to the north of the Bath Conservation Area and therefore does form part of the asset's immediate surroundings.

5.216 The Bath City-Wide Character Appraisal identifies the openness of the plateau on which the Site sits as a positive feature of the conservation area's setting. The Site in its current form as playing fields does provide some contribution to the significance of the asset due to its largely undeveloped nature. The fields containing the Site are an area of historically open space and part of the former grasslands of the Cotswold plateau. However, the use of the Site as playing fields somewhat lowers this contribution as, while its open character has been largely retained, it no longer forms part of the conservation area's rural setting.

5.217 There is some intervisibility between the Site and the asset from views northwards along Lansdown Road. These views are largely glimpsed views due to the intervening built form of Kingswood School and the tall vegetation currently along the south-western boundary of the Site. However, while glimpsed these views do allow for an understanding of the open, undeveloped landscape beyond these screening factors visible, and it is likely any screening by vegetation may be much reduced during winter months. While there is intervisibility between the Site and the conservation area, the Site does not lie within any key views of the conservation area. The Bath City-Wide Character Appraisal has identified key views which contribute to the conservation area's significance as they allow for a better understanding, appreciation and experience of the asset's special character. These views across the northern fringes of the designated area are largely focused south and south-west across the valley towards the main developed area of Bath and as such do not include the Site.

5.218 Therefore while the Site provides some contribution to the asset's significance as an area of open landscape within its immediate surroundings, this contribution is relatively minor.

Sensitivity to development of the Site

5.219 The sensitivity of Bath Conservation Area to the proposals is **high**.

5.220 The Site is in a sensitive location due to its close proximity to the conservation area. The Site currently forms part of the asset's open surroundings, however its use as playing fields means it currently provides limited contribution to the significance of the asset.

Potential for harm to the asset

5.221 The asset will not be physically affected by the proposed development and so any harm to the significance of the asset is via setting change.

5.222 The Site is located within the wider agricultural landscape surrounding the Bath Conservation Area, as such development within this area could impact on the aesthetic value of the asset.

5.223 There is potential for some intervisibility between the Site and the asset, however this intervisibility is minor and comprises glimpsed views due to intervening built form and vegetation. Therefore, while the development of the Site would introduce change into these views it is unlikely to result in an impact to the significance of the asset.

5.224 The Site currently forms part of the open landscape surrounding the asset and development within the Site would result in the loss of the openness of this part of the landscape. However, due to its current function as playing fields, the Site's contribution to the significance of the asset is reduced and its historic function as a rural landscape has already been lost. Additionally, the experience of the open surroundings of the asset has already been significantly altered within views northwards from this part of the conservation area due to the existing built form of the Kingswood School and Ensleigh residential development, the residential development especially introducing an urbanising character to views of the surrounding area.

5.225 The introduction of modern development within the Site would alter the setting of the asset and cause harm to its significance by affecting its aesthetic value, changing the way the asset is experienced by introducing further modern development into its immediate surroundings which are predominantly of an open, rural character. However, due to the current function of the Site as playing fields and the built form of nearby modern developments, this would be a **medium** level of potential for harm.

Level of effect

5.226 The development of the Site would have a **low** level of effect on the Bath Conservation Area, which would likely equate to **less than substantial harm** to the asset.

Beckford's tower with attached wall and railings (NHLE Ref. 1394133)

Summary

5.227 The Grade I listed Beckford's Tower comprises a belvedere or prospect tower constructed in c.1825-7 by the architect Henry Edmund Goodridge for William Beckford, who was a notable and controversial figure known nationally for his involvement with the slave trade, arts and culture. The tower functioned as a private retreat for Beckford where he could display his art collection, write manuscripts and take in the panoramic views of the local landscape. Beckford accessed the Tower from his townhouse on Lansdown Crescent and he would travel to the tower through his privately owned 1.8km landscaped ride, which included a wood and a grotto passage.

5.228 Following Beckford's death in 1844, the Tower was passed to the Parish of Walcot by Beckford's daughter and became a mortuary chapel.

Table 5.15: Beckford's tower summary table

Importance	Type of change	Sensitivity	Risk of harm	Level of effect
High	Setting change	High	High	Medium
High	Setting change	High	High	Less than substantial harm

Significance

The significance of Beckford's Tower is drawn from the following values:

- **Evidential value:** the asset provides detailed information on both the building craft and materials of the time (including innovative techniques such as a state-of-the-art heating system), but also evidences the layers of change that have occurred as it developed from private tower to chapel to a museum
- **Historical value:** The Tower holds a very high level of historic illustrative value as a notable Georgian building which reflects the historic development of Bath and its surrounding landscape. The asset also has historic associative value due to its relationship with William Beckford, a notable historic personality, and due to its construction by Henry Edmund Goodridge, a celebrated regional architect.
- **Aesthetic value:** The significance of the listed building derives primarily from its architectural value as a good example of a belvedere/prospect tower. The listing description for the asset states it was built as "an innovative fusion of Picturesque asymmetry and precise Neo-classicism, it has been called a key monument in the development of Neo-classicism"
- **Communal value:** The asset derives communal value from its later use as a mortuary chapel, suggesting it became of importance to the local community.

The importance of this asset is therefore **high**.

Contribution of setting

5.229 The tower is situated on the summit of Lansdown Hill, on a plateau between the Avon/Weston valley and the Langridge/Woolley valley. When the tower was built it occupied a space within open countryside and was intentionally situated to take advantage of the 360 panoramic views of the landscape from this location. While parts of this rural landscape have been subsequently developed through the 19th-21st centuries, views from the tower still retain a strong rural character which contributes to the asset's significance. Views to and from the tower are of very high importance to the significance of the asset and form a key element of its setting. The asset is notable landmark from within the city, being visible from many locations across the city and surrounding landscape due to its height and its prominent location on a summit. This landmark quality was an intentional part of the structure's design, with the golden elements of upper levels being especially eye-catching. Views from the asset out into the surrounding landscape panoramic and can be experienced as full 360 views around the tower. The south-west facing view is especially striking with a view out across the Avon valley and the city of Bath and to the Mendip hills beyond. While the south-west facing views are the most expansive, all views across the landscape from the Tower would be considered key views as the ability to experience the landscape and have panoramic views across it was one of the reasons for Beckford constructing the Tower, and was likely a reason for the siting of the asset at this specific summit.

5.230 Immediately surrounding the Tower is the Lansdown Cemetery and this designed landscape not only contributes to the asset's significance by forming part of the open, pastoral setting of the asset but it also contributes by improving the ability to understand the history of the tower after c.1840 when it became a mortuary chapel for the Parish of Walcot. Additionally, while not part of the original setting of the Tower the cemetery provides a tranquil and secluded feeling to the landscape immediately surrounding the asset and this privacy and tranquillity reflects the original intention of the Tower as a retreat for Beckford from the business of the city centre. Therefore, while the cemetery does not reflect the original setting of the Tower it does provide a strong contribution to the significance of the asset.

5.231 Beckford created a landscaped ornamental ride from his townhouse on Lansdown Crescent to the Tower, known as Beckford's Ride, which formed the intended access route to the asset. The route started from the walled nursery gardens behind the townhouse, before passing through a crenelated gateway and into a continuous designed landscape of meadows, woodland and a specially created grotto passage. The land on which Beckford’s Ride was located was within land privately owned by Beckford, but this land has since been broken up into multiple ownerships, resulting from the sale of land after Beckford’s death, and has largely

been developed with 19th and 20th century housing. As such, much of the Ride does not survive although remnants have been retained including the area around Lansdown Cemetery and a section of the grotto passage. These remnants reference the wider formal designed landscape of the Ride and are key elements of the asset's setting which contribute to its significance.

5.232 Another key approach to the asset is along Lansdown Road. This ancient route approaches the city of Bath from the north and was formalised as a turnpike road in 1707, making it a key route into the city. Historically this road popular route for walking and riding into Bath through what was largely common grassland until enclosure in the 1790s. Beckford intentionally located his Tower to be accessible from this main route, also ensuring it would act as a striking introductory landmark for travellers arriving to Bath from the north.

Contribution of the Site to asset’s significance

5.233 The Site is located to the north of the asset and forms part of its wider setting. The Site contributes to the asset's significance by forming part of the open landscape within which the asset was intentionally situated. The Tower's design and construction was completed with the intention that the occupants be able to experience and appreciate the wider rural landscape which surrounds it. While the Site is no longer rural in character but in use as playing fields, the openness of this activity reflects the historic character of the landscape and the lack of development within the Site helps maintain the overall rural character of these views.

5.234 Views towards the tower are also important and the asset appears as a landmark in several views due to its tall height and prominent position and this landmark character was part of the asset's intentional design. The Tower is visible in southwards looking views from the Site, with the upper lantern section visible above the tree line. The Site sits to the north of the asset, away from the plateau edge and partially screened by trees along the south and east boundaries, and is therefore not visible in most views towards the asset except from within the Site itself.

Sensitivity to development of the Site

5.235 The sensitivity of Beckford's Tower to the proposals is **high**.

5.236 The Site currently forms part of the open rural landscape within which the asset was intentionally situated. Additionally, the asset was designed and located with the intention that occupants should be able to experience 360 panoramic views of this open landscape. Therefore, the Site contributes to the asset's aesthetic value

and due to the importance of the open character of these views the asset is sensitive to potential development which would result in the loss of this quality.

Potential for harm to the asset

5.237 The development of the Site would introduce change into views both towards and outwards from the asset.

5.238 Views towards the asset from within the Site contribute to the asset's significance due to the asset's landmark character. However, with only the top part of the Tower visible above the tree line these views do not fully allow for an appreciation of the asset's architectural or aesthetic value. Additionally, while development may result in some loss of views to the asset the development will not introduce competition for prominence within most views towards the asset and its landmark character will be retained.

5.239 The panoramic 360 views from the asset of the open rural landscape surrounding site were intended to be appreciated and experienced as part of the structure's design. While the Site itself is no longer rural in function, it remains largely undeveloped and the playing fields retain this open character and allow for the appreciation of the wider the rural landscape to the north of the Site. The addition of a residential development within these views would somewhat reduce the ability to experience 360 views of the rural landscape and there has potential for harm to the asset through changes to its setting. However the existing Ensleigh residential development has already resulted in changes to views looking northwards from the asset, meaning views towards the Site have already been disrupted by previous development activity. Although this existing residential development and current function of the Site as playing fields rather than rural land does somewhat reduce the potential for harm to the asset, the development still presents a **high** risk of harm due to the further loss of the asset's rural surroundings.

Level of effect

5.240 The development of the Site would have a **medium** level of effect on Beckford's Tower, which would likely equate to **less than substantial harm** to the asset.

Lansdown Cemetery and Beckford's Tower Registered Park and Garden (NHLE Ref. 1000563) and associated listed buildings (NHLE Refs. 1394440, 1394443, 1394446)

Summary

5.241 The Grade II Registered Park and Garden of Lansdown Cemetery was consecrated in 1848 and designed to incorporate the former pleasure ground and ride set out at this location by the architect Henry Edmund Goodrdige for William Beckford in c.1825-7. The RPG covers an area of c.3ha on a plateau on the west side of Lansdown Hill, which as expansive views to the south-west towards Bath, and is surrounded to the north-east, south-west and south-east by a 1m high stone wall. Prior to his death Beckford designed a sarcophagus that was erected in the pleasure grounds adjoining his tower, however when he died the sarcophagus was moved to Abbey Cemetery in Bath as the grounds were not consecrated. In 1847 Beckford's daughter sold the land surrounding Beckford's Tower to the Parish of Walcot on the condition that they would create a cemetery at the Site so that her father's tomb could be returned to its original location. When the land was consecrated the tower was converted to a mortuary chapel. The main entrance to the RPG is marked by a Grade II* listed set of gates, constructed by Goodridge in 1848 when the cemetery was consecrated. The gates feature an imposing Greek-style portico which create a grand entrance to cemetery. Also within the cemetery are two Grade II listed chest tombs dating to the mid-19th century.

5.242 The RPG is formed of three main sections, the area immediately surrounding the Tower, the central area where many historic tombs lie, including Beckford’s own tomb, and the south-eastern area, which is formed of meadowland and a 20th century cemetery extension. The central area has a mix of trees including yews, laurel and cypress which largely screen the cemetery from the adjacent Lansdown Road. This section is left untended so that wild flowers, shrubs and grasses flourish. This contrasts 20th century extension, which is of a more formal design with tended graves and mown grass.

Table 5.16: Lansdown Cemetery and Beckford's Tower RPG and associate listed buildings summary table

Importance	Type of change	Sensitivity	Risk of harm	Level of effect
High	Setting change	Medium	Low	Low
High	Setting change	Medium	Low	Less than substantial harm

Significance

5.243 The significance of Lansdown Cemetery RPG is drawn from the following values:

- **Historical value:** The assets have historical illustrative value as an example of a mid-19th century which incorporates elements of an earlier pleasure ground and ride. It reflects the historic development of Bath and its surrounding landscape. The asset also has historic associative value due to its relationship with William Beckford, a notable historic personality, and due to its construction by Henry Edmund Goodridge, a celebrated regional architect.
- **Aesthetic value:** The assets have aesthetic value due to the elements of the designed landscape the architectural quality of the built structures, such as the entrance gates.
- **Communal value:** The assets have communal value as a cemetery surrounding a mortuary chapel, giving the area both commemorative and social value to the surrounding community.

5.244 The importance of this group of assets is therefore **high**.

Contribution of setting

5.245 The cemetery is enclosed by dry stone walls, railings and the cemetery portico. These boundaries in combination with the trees which surround and cover much of the area create a sense of privacy and enclosure. These boundary features create a sense of separation between the cemetery and its surroundings which reflects its function as a place of memorialisation and reflection. This seclusion also reflects the

earlier intention for the land when it formed part of the pleasure gardens Beckford laid out to surround his tower, which was also intended to be a private retreat. Therefore, this sense of enclosure created by the built boundaries and the vegetation surrounding the designated area is an important element of the assets' setting that allows for the intended experience of the area.

5.246 The cemetery lies on the edge of the Lansdown ridge, in a prominent location close that allows for panoramic views across the Avon valley and city of Bath. This location was an intentional choice for the siting of Beckford's Tower and it is likely that Beckford's Ride was also laid out to take advantage of these views as Beckford travelled from Bath to his tower. With its location on a prominent ridge Beckford's Tower appears as a landmark within views across Bath, which was likely also an intentional choice and influenced the siting of the Tower and its surrounding pleasure grounds. Both the opportunity for panoramic views and the opportunity to create a striking landmark visible from the Georgian city would have appealed to Beckford. Due to the functional relationship between the Tower and the RPG, which originally formed the private pleasure gardens surrounding the Tower, and these views are an important part of the asset's setting provides a strong contribution to its significance.

5.247 Lansdown Road lies adjacent to the cemetery and is also an important element of the assets' setting. This road provides the main access to the area following its consecration as a cemetery in the mid-19th century, as demonstrated by the elaborate gates marking the entrance. This road is also a key historic approach to the city of Bath, which likely was also influential in the original siting of the Tower and its surrounding designed landscape. As such, the location of the cemetery along the Lansdown Road is an important attribute of setting contributing to significance.

5.248 The wider physical setting of the cemetery makes a lesser contribution to significance. The significance of the cemetery and its associated structures is best understood within the enclosed space, where its relationship to the Tower, Lansdown Road and the prominent ridge side location can be best appreciated. Due to the screening created by walls and vegetation that cemetery cannot be experienced from most locations within the surrounding landscape and as such the wider setting of these asses is more incidental and is not intrinsic to understanding, appreciating or experiencing the assets.

Contribution of the Site to asset's significance

5.249 The Site is located to the north of these assets, within the fields to the north-east of Lansdown Road.

5.250 The RPG is enclosed by walls/railings with trees also along most boundaries. This creates a sense of enclosure, which reflects the privacy which Beckford was attempting to achieve with the construction of his tower retreat. This privacy and enclosure also reflects the asset's later use as a cemetery, allowing for quiet moments of reflection or prayer. Additionally, the trees which cover much of the eastern, northern and southern boundaries of the Site further prevent intervisibility between the assets and the Site. This lack of intervisibility further emphasises the sense of enclosure for the assets but consequently the land within the Site does not specifically allow for the ability to experience or appreciate the historic, aesthetic or communal value of the assets.

5.251 The key element of setting which contributes to the significance the listed buildings in this group is their location within the cemetery, the limits of which are defined by the boundary of the RPG. The Site does not form part of the RPG or the approach to the RPG and as such is not a key element of the setting of these assets.

5.252 Therefore, while the Site is located in close proximity to the assets it does not currently form an element of their setting which would allow for the understanding, appreciation or experience of the significance these assets. As part of the assets' incidental wider setting the Site makes a neutral contribution to their significance.

Sensitivity to development of the Site

5.253 The sensitivity of the asset to development within the Site is **medium**.

5.254 The Site is located within close proximity to the assets and therefore is sensitive to development. However as the Site does not currently form any element of the asset's setting which specifically contributes to its significance this sensitivity is somewhat reduced.

Potential for harm to the asset

5.255 The asset will not be physically affected by the proposed development and so any harm to the significance of the asset is via setting change.

5.256 As a neutral element of the setting for these assets, development within the Site is unlikely to affect the way in which these assets understood, appreciated or experienced. Development within the Site would not intrude on any key views associated with these assets, which are largely internal or towards the south-west across the Avon valley. As such the potential harm to the assets as a result of the development of the Site is **low**.

Level of effect

5.257 The development of the Site would have a **low** level of effect on Lansdown Cemetery and Beckford's Tower RPG and the three associated listed buildings, which would likely equate to **less than substantial harm** or **no harm** to the asset.

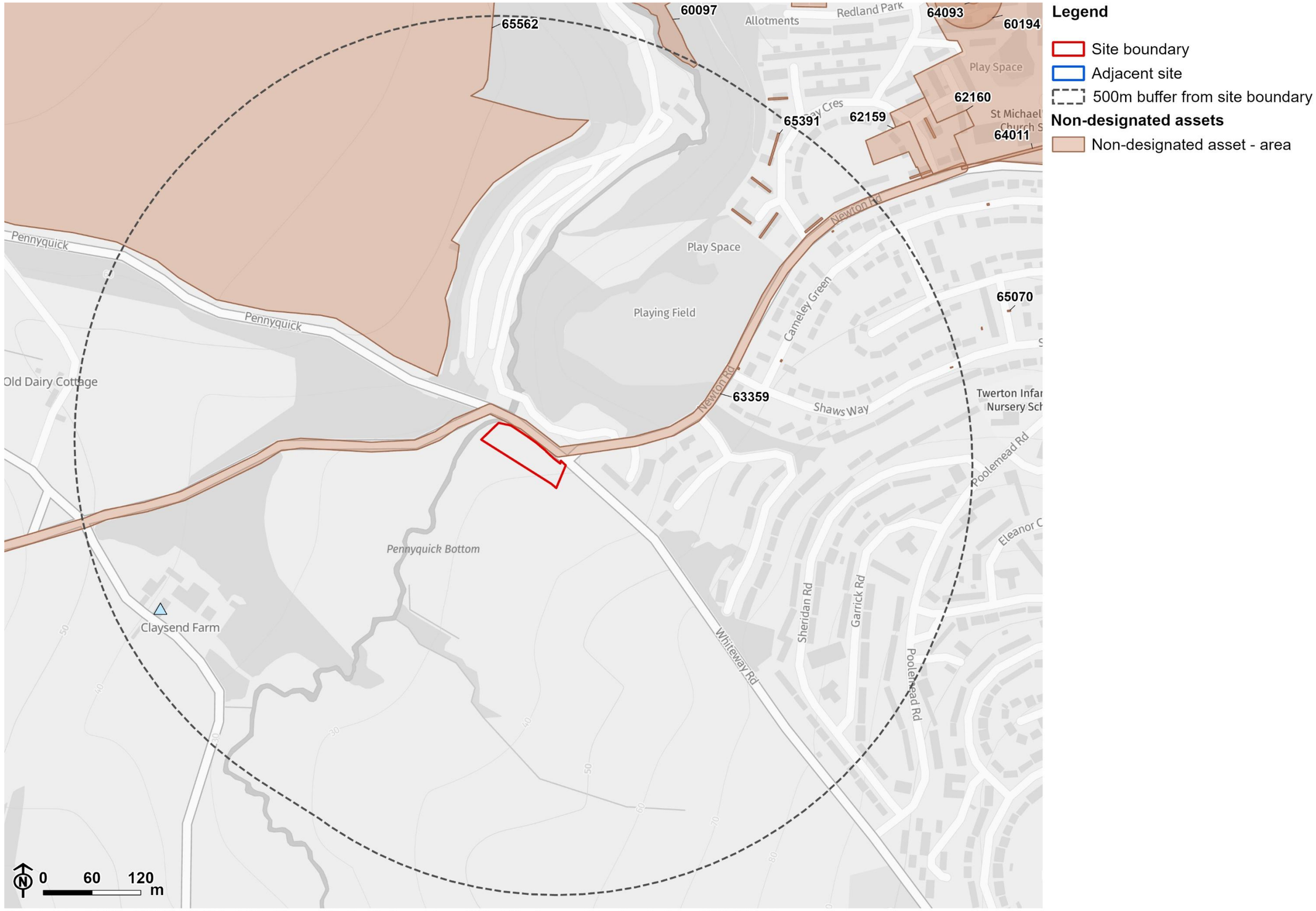
Whiteway Road (Gypsy and Traveller site)

Site description

5.258 The Site comprises a parcel of undeveloped greenfield land currently functioning as agricultural pasture. The Site features flat to gently undulating topography, bounded by managed agricultural hedgerows and native trees. Access is currently available via the main Whiteway Road.

5.259 The Site, designated assets and non-designated assets are shown on **Figure 5.7.**

Figure 5.7: Whiteway Road



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Designated heritage assets within the Site

5.260 There is one designated heritage asset located within the Site:

- City of Bath World Heritage site

Interactions with WHS

5.261 The Site is located within the western part of the City of Bath WHS.

5.262 The Site forms part of the rural surroundings of city of Bath. These rural surroundings contribute to the OUV of the WHS as the city was intended to sit within the valley with the hills rising above it, with the green setting of the city in a hollow in the hills being one of the main attributes contributing to the OUV identified in the WHS Management Plan.

5.263 Therefore, the Site in its current form does contribute to the OUV of the WHS as one of the green undeveloped hillsides surrounding the city, which is one of the attributes that contribute to the OUV identified in the WHS management plan. Specifically of the elements identified as reflecting the OUV in the WHS management plan the Site contributes by forming part of the open agricultural landscape around the city edges, in particular grazing and land uses which reflect those carried out in the Georgian period.

5.264 On the whole, the settlement of Twerton is largely contained to the east of Whiteway Road, with the road forming a barrier between the existing settlement and the green hillsides of the Avon Valley. Development within the Site would encroach into this green hillside, although the location of the Site on the lower slopes of the hill means that it is in a less prominent location. However, development within the Site has the potential to affect the OUV of the WHS by introducing a change to the green, undeveloped hillsides that make up one of its attributes. Therefore, this would result in a **high** level of harm, and a **high** level of effect.

Non-designated heritage assets

5.265 There are no non-designated heritage assets recorded within the Site.

Archaeological potential

5.266 No previous archaeological investigations have been recorded within the Site. The closest archaeological investigation is located c.100m north-west of the Site and comprised a geophysical survey conducted between 2009-2011. The investigation identified resulted in the possible identification of two adjacent settlements of unknown date, consisting of anomalies that represented ditches, trackways and roundhouses.

5.267 A section of an Iron Age routeway between Mendips and Bath is located immediately north of the Site (HER Ref. 63359). Immediately to the north of this Iron Age routeway a field system of possible prehistoric origin is recorded (HER Ref. 61476). The original source of this record is unclear but "Celtic" fields have been recorded in the Newton Brook Valley. An Ordnance Survey record states the area has "clear indications of medieval fields" but no remains of an earlier/prehistoric field system were identified. However the possible Roman and prehistoric settlement activity identified adjacent to this field system, c.500m from the Site, does indicate the evidence of prehistoric and Roman occupation within the area.

5.268 In addition to the medieval field system to the north of the Site, medieval strip lynchets have been recorded c.370m south-west of the Site, indicating that much of this land appears to have remained in agricultural use since the medieval period. An exception to this are the several areas of localised mine or quarrying recorded across the landscape, including two mine shafts c.60m north of the Site and c.240m south of the Site (HER Ref. 64095, 64099) and a quarry site c.90m north of the Site which included a quarry area and three lime kilns (HER Ref. 60195).

5.269 Given the proximity to the Iron Age routeway, the archaeological potential of the Site is considered to be **medium**.

Historic landscape character

5.270 The Site does not fall under a settlement type. The closest settlement type is 20th Century ('New' or 'Modern') which is located 18m northeast.

Heritage assets with the potential to experience setting change

5.271 The following designated heritage asset has been identified as having the potential to experience effects to significance due to development within the Site as a result of changes to setting:

- Claysend Farmhouse (grade II listed, NHLE Ref. 1312907)

Claysend Farmhouse (NHLE Ref. 1312907)

Summary

5.272 The Grade II listed Claysend Farmhouse comprises a mid-late c.17th century farmhouse. The two storey (with attics) building is constructed of rubble with freestone dressing and some c.20th century alterations include the tiled roof, the door and the gabled porch.

Table 5.17: Claysend Farmhouse summary table

Importance	Type of change	Sensitivity	Risk of harm	Level of effect
High	Setting change	Medium	Medium	Low
High	Setting change	Medium	Medium	Less than substantial harm

Significance

5.273 The significance of Claysend Farmhouse is drawn from the following values:

- **Evidential value:** The asset derives evidential value from the surviving c.17th century materials which are included within its fabric.
- **Historical value:** The asset has historical (illustrative) value as an mid-late 17th century farmhouse, demonstrating the use of the landscape during this time which was formerly agricultural land before the expansion of Bath.
- **Aesthetic value:** The significance of the listed building derives primarily from its architectural value as a good example of a c.17th century farmhouse.

5.274 The importance of this asset is therefore **high**.

Contribution of setting

5.275 One of the key elements of the asset's setting which contributes to its significance include the surviving historic outbuildings which are associated with

Claysend Farm. These include the buildings to the north and north-east of the farmhouse which are constructed similar rubble walls and tiled roofs. These materials and the design of the structures, which clearly marks them as of agricultural function such as barns or stables, allows for a good understanding and appreciation of the relationship between these structures and the main farmhouse. These buildings and the courtyard they form around the farmhouse have a direct functional historic relationship with the asset and therefore form the most important element of its setting.

5.276 Another element of the asset's setting which contributes to its significance is the surviving rural landscape which surrounding the asset. This landscape helps to understand the asset's original function as a farmhouse the lack of development within the fields immediately surrounding the asset allow for an experience fo the asset which reflects the historic setting within which it was constructed. Those fields which contribute most to the asset's significance as the ones which formed part of Claysend Farm as these have a direct historic functional relationship with the asset. Those fields which did not form part of the farm but are still located within close proximity to the asset also contribute to its significance but to a lesser degree.

Contribution of the Site to asset's significance

5.277 The Site is located c.440m north-east of the asset.

5.278 The Site forms part of the wider agricultural landscape surrounding the asset, which contributes to the ability to understand and appreciate it as a farmhouse. However, historic mapping suggests that the field within which the Site is located was not part of the farmland with which the house was associated. The tithe apportionments from c.1839/1840 show the Site as not only under a different ownership to the asset but also within a different parish. As such while the Site contributes to the asset's significance as forming part of its wider rural surroundings, it does not have a direct functional historical relationship with the farmhouse and as such its contribution is to a lesser extent than those fields which historically belonged to the same farm.

5.279 Additionally, the asset is not visible from within the Site due to intervening tree cover. The Site may be visible in views from the asset out towards the agricultural landscape to the east, however this is likely screened by the lower lying elevation of the Site and the area of woodland to the east of the asset. Those fields which are most visible in views eastwards from the asset are those to the east of the Site which slope upwards, but it is likely the Site could be visible from the upper levels of the farmhouse.

5.280 Therefore the Site in its current form does provide some contribution to the significance of the asset by forming part of its setting which allows the appreciation, understanding and experience of the asset as a historic farmhouse. However this contribution is reduced by the intervening distance and the lack of a specific historic connection between the Site and the asset.

Sensitivity to development of the Site

5.281 The sensitivity of Claysend farmhouse to the proposals is **medium**.

5.282 The Site forms part of the wider agricultural setting of the asset which contributes to its significance through its function as a farmhouse and it is therefore sensitive to development. The sensitivity of the assets is somewhat reduced by the distance separating the Site and the asset and the lack of a specific functional historic relationship between the Site and the asset.

Potential for harm to the asset

5.283 The rural character of the Site contributes to the significance of Claysend Farmhouse and the loss of part of this landscape has the potential to result in harm to the asset. However the potential for harm is reduced by the agricultural landscape which would continue to separate the Site from the asset. Therefore while development of the Site would result in a slight loss to the asset's agricultural surroundings, the character of the asset's setting would remain unchanged as being part of the rural landscape to the west of the city of Bath. Additionally, the development of a gypsy/traveller Site, with the limited number of permanent additional structures and the likely relatively low heights of the development, presents a lower overall risk than a residential type of development.

5.284 Therefore the potential for harm to the asset as a result of the proposals is **medium**.

Level of effect

5.285 The development of the Site would have a **low** level of effect on Claysend Farmhouse, which would likely equate to **less than substantial harm** to the asset.

Chapter 6
Batheaston and Bathford

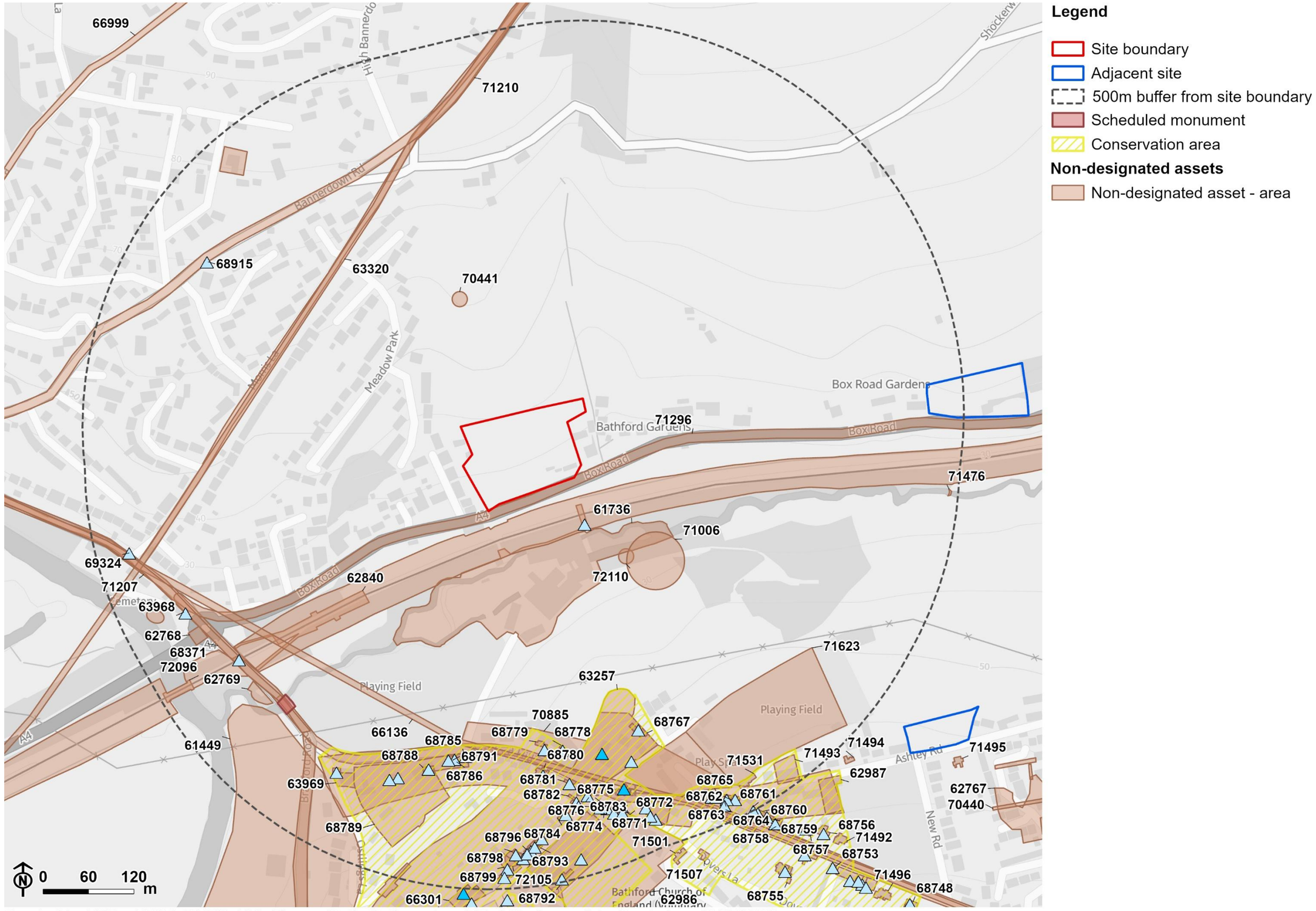
Bathford Nurseries (South)

Site description

6.1 The Site comprises an area of c.1.5ha immediately to the north of the A4/Box Road. The eastern portion of the Site currently contains the Bathford Nurseries Garden Centre with the remainder of the Site containing several small fields separated by patches of tree plantation.

6.2 The Site, designated assets and non-designated assets are shown on **Figure 6.1.**

Figure 6.1: Bathford Nurseries (south)



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Designated heritage assets within the Site

6.3 There are no designated heritage assets located within the Site.

Interactions with WHS

6.4 The Site is not located within the City of Bath WHS, although it does lie within its setting.

Non-designated heritage assets

6.5 There are no non-designated heritage assets recorded within the Site by B&NES HER.

Archaeological potential

6.6 No previous archaeological investigations have been recorded within the Site. The closest previous archaeological investigation recorded by B&NES HER comprises a watching brief c.430m to the north-west of the Site, which recorded unstratified findspots but no archaeological features.

6.7 The earliest evidence of activity recorded in the area surrounding the Site dates to the Roman period. Three possible Roman roads have been identified near the Site, including two possible routes of the Fosse Way which both appear to have been identified from mapping and documentary sources (HER Refs. 66999, 63320) and one possible road identified from earthworks visible in LiDAR/aerial photographs (HER Ref. 66136). Near the intersection of these possible roads is a possible Roman villa site (HER Ref. 61449), although this location is based on reports from the 17th century of a mosaic and hypocaust. A site visit in was conducted in 1989 by Avon Council but it could not confirm the presence of any villa site and the asset does not appear to have been subject to any further investigation. A findspot of a Roman coin is also recorded c.160m north of the Site (HER Ref. 70441).

6.8 Other nearby activity relates mainly to the medieval settlement of Bathford, located c.290m south of the Site (HER Ref. 70885). This settlement activity does not appear to have extended into the Site and is focused mainly around the High Street and it is likely the Site formed part of the agricultural hinterland surrounding the settlement. Most other heritage assets recorded within the surrounding area relate to transport links between this settlement and the wider area, including the city of the

Bath. These include turnpike/toll roads (HER Refs. 71210, 71207, 71296, 71474), the Great Western Railway (HER Ref. 66135) and the horse drawn and electric tramway into Bath (HER Ref. 68371).

6.9 Further post-medieval activity recorded near the Site includes Bathford Spa, (HER Ref. 72110), a mineral spring identified by John Wood in 1742 in his Essays towards a Description of the City of Bath, and Bathford Paper Mill, (HER Ref. 61736) which is also known as Trevano Mill and is one of the few survivors of a widespread industry in Avon, although the mill was largely rebuilt in the 20th century.

6.10 Due to the lack of previous investigations within the area surrounding the Site, the potential for archaeological remains, especially those of any earlier prehistoric or Roman origin, is somewhat uncertain. However there has been some disturbance in the east of the Site as a result of the modern structures relating to the Bathford Nurseries, which may have truncated or removed any potential archaeological remains within their footprint.

6.11 The Site therefore shows some potential for Roman activity due to its close proximity to three Roman roads. As part of the setting of the City of Bath WHS, any Roman remains would contribute to the OUV of the WHS and would therefore be considered of **high** heritage importance.

6.12 There is also some potential for agricultural remains of medieval or later date within the Site, however a review of LiDAR imagery does not show any further agricultural activity beyond the field boundaries currently located within the west of the Site which are of a relatively modern date. Such remains are a common type found nationally and as such have limited evidential value and would be of **low** heritage importance.

Historic landscape character

6.13 The historic landscape character of the Site is recorded as mostly comprising Late medieval enclosed open fields created by local arrangement and exchange. The eastern part of the Site is also recorded as comprising 20th century ('New' or 'Modern') settlement activity.

Heritage assets with the potential to experience setting change

6.14 The following designated heritage assets have been identified as having the potential to experience effects to significance due to development within the Site as a result of changes to setting:

- Bathford Conservation Area

Bathford Conservation Area

Summary

6.15 The Bathford Conservation Area covers the historic core of the village of Bathford. The settlement is located on slopes of Bathford Hill, to the south of the separate settlement of Batheaston. The settlement is of medieval origin and developed around the ford across the Rier Avon to the west of the main settlement area. The village has remained a relatively small agricultural village, with the historic core extending mostly along the two roads of High Street and Church Street. Other key developments associated with Bathford include the mineral spring and adjoining mill that became known as 'Bathford Spaw' in the 18th century, with the mill later being renamed to Trevano Mill.

Table 6.1: Bathford Conservation Area summary table

Importance	Type of change	Sensitivity	Risk of harm	Level of effect
High	Setting change	Medium	Low	Low
High	Setting change	Medium	Low	Less than substantial harm

Significance

The significance of Bathford Conservation Area is drawn from the following values:

- **Historical value:** The asset primarily derives significance from its historical value as a settlement of originally medieval origin.
- **Aesthetic value:** The assets has architectural value due to the large number of historic buildings within the designated area, many of which are listed buildings.

6.16 The importance of this asset is therefore **high**.

Contribution of setting

6.17 One of the key elements of setting which contribute to the significance of the Bathford Conservation Area is the location of the ford around which the settlement developed. This ford is recorded by B&NES HER as being located at the grid reference ST 785 665 (HER Ref. 62666), to the west of the existing settlement. This ford was main reason for the settlement being sited at this location and therefore it has a strong functional relationship with the conservation area.

6.18 The agricultural surroundings of the village also contribute to the significance of the conservation area as Bathford was historically primarily an agricultural settlement. The rural landscape currently surrounding the conservation area reflect its historic setting and provide the ability understand and appreciate the historic landscape within which the settlement development. As such views outwards towards the agricultural landscape from the conservation area do provide some contribution the asset's significance as they allow for an experience of the asset as an agricultural settlement.

6.19 Other views which are of importance to the significance of the conservation area are those located along the main approaches to the settlement. These main approaches are largely along the A36 to the west and the High Street. These two roads were turnpiked in the 18th century, indicating that these were also two major historic routes through the landscape and suggesting these were the main approaches to the village historically, which is supported by the urban design of the settlement which is largely located along the High Street and Church Street. These views also include views of the wider rural landscape which also help to experience the settlement within its historic context, despite the elements of modern development in the surrounding area such as the Garston residential development to the north of the High Street.

Contribution of the Site to asset's significance

6.20 The Site is located c.290m north of the asset. The western area of the Site forms part of the wider rural surroundings of the asset and therefore does provide some contribution to its significance. This significance is reduced by the lack of intervisibility between the Site and the asset. While views of the rural landscape to the north of the conservation area possible from several locations, including on approach to the asset from the south-east along the High Street, due to the low elevation of the Site the fields comprising the Site do not appear in these views. As such while the Site forms part of the asset's wider rural context there is no experiential relationship between the two that would allow for an understanding or appreciation of this relationship.

6.21 The eastern part of the Site contains Bathford Nursery, which does have an association with the settlement as part of the wider use of the landscape. Historic mapping indicates that nurseries have been present at this location since the 1930s, however the structures within the Site are all of a modern type of no heritage value. Therefore the nursey within the Site does not specifically contribute to the historical significance of the asset.

6.22 Additionally the Site is physically separated from the asset by the A4 and Great Western Railway line, both of which appear as early as the 1839 tithe map. These act as a division within the landscape, separating the Site from the historic settlement of Bathford.

6.23 As such while the Site forms part of the wider rural surroundings of the conservation area it does not form any specific element of the asset's setting which would contribute to its significance.

Sensitivity to development of the Site

6.24 The sensitivity of Bathford Conservation Area to the proposals is **medium**.

6.25 The Site forms part of the wider rural setting of the conservation area, however its contribution to its significance is lowered due to the distance and lack of intervisibility between the Site and the asset, therefore lowering its sensitivity.

Potential for harm to the asset

6.26 The asset will not be physically affected by the proposed development and so any harm to the significance of the asset is via setting change.

6.27 Development within the Site will result in change within the asset's wider rural setting. The loss of part of this wider rural landscape has the potential to result in harm to the asset. However due to the small size of the Site and the existing modern development currently occupying the Site it is unlikely that such a change would have an effect on the ability to understand, appreciate or experience the heritage significance of the asset. The development of the Site would therefore result in a **low** potential for harm to the asset.

Level of effect

6.28 The development of the Site would have a **low** level of effect on Bathford Conservation Area, which would likely equate to **less than substantial harm** or **no harm** to the asset.

Setting effects to WHS

6.29 The Site is located within the area which has been identified to be part of the setting of the WHS.

6.30 The Site may be visible in long distance views of the WHS, as indicated by the ZTVs for the WHS Setting SPD (B&NES, 2012) (for example Viewpoint 11 Camden Crescent and Viewpoint 22 Area Visible from the Viewpoint at Ralph Allen's Carriage Drive / Bathampton Down). The location of the Site and is current undeveloped nature means that it does contribute to OUV, in particular to the attribute ‘the green setting of the city in a hollow in the hills’.

6.31 However, the Site is located in an area of low elevation at the foothills of elevated land which forms part of the Cotswold Plateaux and Valley and is not

located on one of the important green hillsides or skyline. Development within the Site would create a change to the green, undeveloped hillside in this part of the setting of the WHS, but it is likely that this change would be fairly imperceptible in long distance views out of the WHS. Development of the Site would likely be perceived as a slight extension of the existing development at Batheaston and viewed as part of the existing settlement which would minimise the development's ability to affect OUV. No other attributes of OUV would be affected. This would create a **low** level of harm, and a **medium** effect.

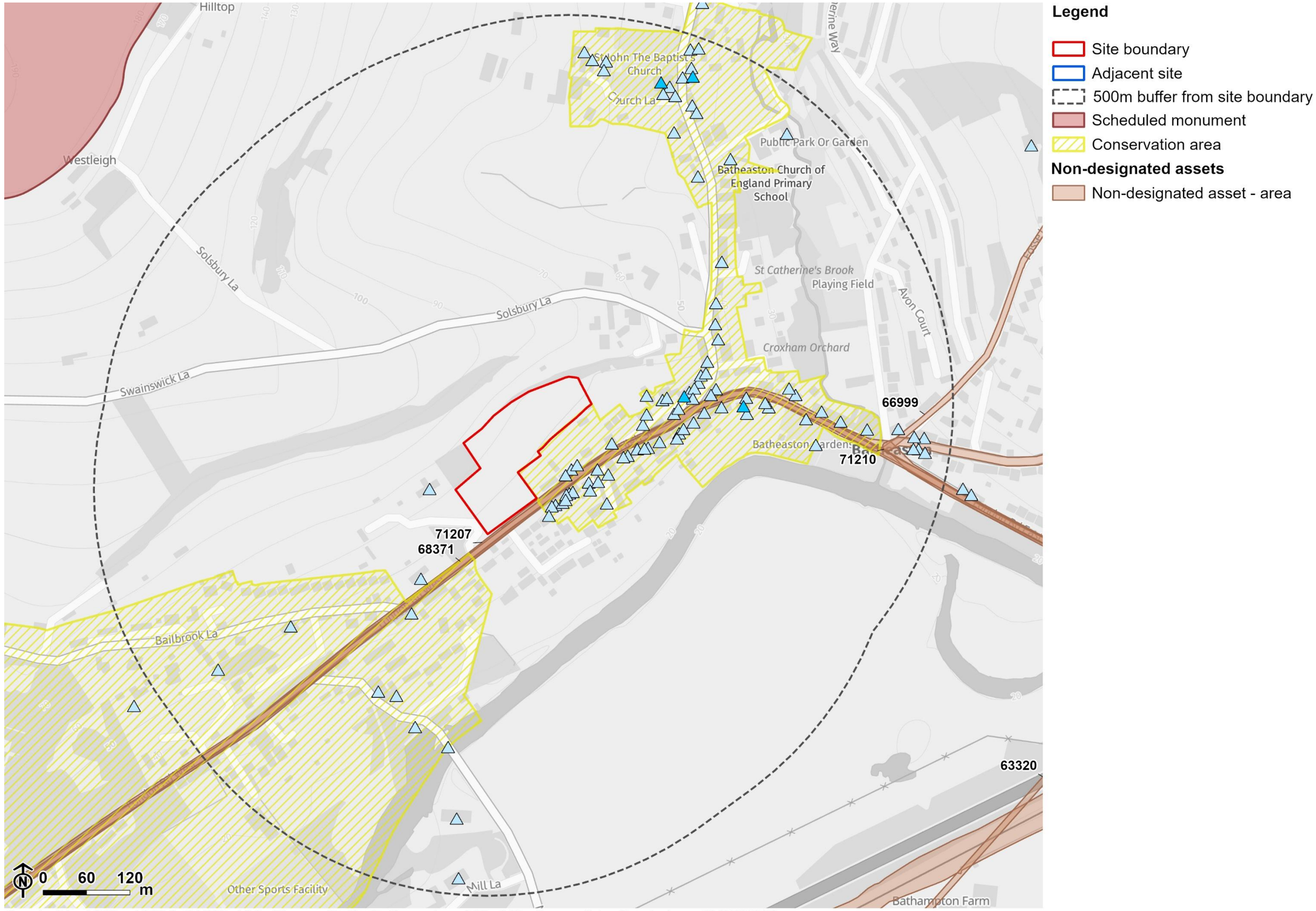
Poplar Nursery, Batheaston

Site description

6.32 The Site is located within the southwestern part of Batheaston, located northwest of the High Street. The Site is located at the bottom of Little Solsbury Hill and slopes steeply to the southeast. It is occupied by grassland and scattered trees. The southeastern part of the Site, where it abuts the High Street, is retained by a stone wall. The rest of the Site is bordered by dense vegetation and trees.

6.33 The Site, designated assets and non-designated assets are shown on **Figure 6.2.**

Figure 6.2: Poplar Nursery, Batheaston



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Designated heritage assets within the Site

6.34 There are no designated heritage assets within the Site.

Interactions with WHS

6.35 The Site is not located within the City of Bath WHS, although it does lie within its setting.

Non-designated heritage assets

6.36 There are no non-designated heritage assets within the Site.

Archaeological potential

6.37 A portion of the southern boundary is aligned with a section of the Fosse Way roman road, along which the High Street now follows. The Fosse Way was the primary route linking Exeter to Lincoln with the Batheaston section serving as a direct northern pipeline into the sacred and commercial hub of Aquae Sulis (Bath).

6.38 The B&NES HER records no archaeological investigations either within the Site or its vicinity. Therefore, the archaeological potential of the Site is largely unknown. The Site appears to have been in agricultural use since at least the medieval period, although its proximity to the Fosse Way suggests that there may be the potential for archaeological remains of Roman date within the Site or its vicinity.

Historic landscape character

6.39 No HLC has been recorded for the Site.

Heritage assets with the potential to experience setting change

6.40 The following designated heritage assets have been identified as having the potential to experience effects to significance due to development within the Site as a result of changes to setting:

- Slight univallate hillfort 190m northwest of Westleigh (1002481)

- Batheaston Conservation Area (and listed buildings within it along the High Street)
- Bath Conservation Area
- Field End (1320523) and associated The Lodge, comprising north, south, east and west lodges (1115216)

Slight univallate hillfort 190m northwest of Westleigh (1002481)

Summary

6.41 The asset comprises a slight univallate hillfort situated on the summit of the prominent Solsbury Hill, which overlooks the River Avon, Lam Brook and St Catherine's Brook. The hillfort survives as a triangular enclosure defined by a single drystone-faced rampart bank, with the northern side of the asset also having and associated ditch. The entrance to hillfort was from the north-wets and excavations in 1955-8 uncovered timber huts constructed at the same time as the ramparts, before being replaced by stone hut circles. The main period of occupation appears to have been during the 2nd century BC. Earlier excavations in 1906 found two inhumations as well as finds such as arrow heads, spindle whorls, pottery and some iron and bronze artefacts.

Table 6.2: Slight univallate hillfort 190m northwest of Westleigh (1002481) summary table

Importance	Type of change	Sensitivity	Risk of harm	Level of effect
High	Setting change	Medium	Medium-low	Low
High	Setting change	Medium	Medium-low	Less than substantial harm

Significance

6.42 The significance of the slight univallate hillfort 190m northwest of Westleigh is drawn from the following values:

- **Evidential value:** The heritage significance of the asset is primarily from the evidential value of its physical remains, including any buried archaeological remains that have the potential to contribute to the understanding of later prehistoric hillforts. Despite some quarrying and past cultivation, the hillfort survives well and will contain archaeological and environmental evidence relating to its construction, longevity, trade, agricultural practices, social organisation, territorial significance, domestic arrangements and overall landscape context.
- **Historical value:** The asset also derives significance from its illustrative historical value as it demonstrates the use of the landscape during the late prehistoric period.
- **Aesthetic value:** As an important feature in an extensive landscape, the hillfort also derives its heritage significance from its high aesthetic value, both due to its landmark qualities and the expansive quality of views outwards from the asset.

6.43 The importance of this asset is therefore **high**.

Contribution of setting

6.44 The setting of the hillfort is defined by its hilltop location. Its elevated position affords extensive, panoramic views of the surrounding agricultural landscape and across the surrounding settlements, including Bath, Bathford, Bathampton and Batheaston within views to the south, east and west. Despite these built elements, when standing on the flat top of the hillfort, it is easy to appreciate the purpose, form and function of the asset and its relationship with the surrounding landscape and this is further substantiated by the surviving areas of rural landscape, which allow for an appreciation of the topography which formed a key part in the siting of the hillfort.

6.45 The relationship of the hillfort to the wider landscape is a critical aspect of its significance. Its hilltop location is partly about the selection of a defensible location, but at least as important – if not more so – is its commanding views of, and visibility from, the surrounding area. Hillforts are often intended to visually, if not militarily, dominate their landscape. The asset is experienced as a prominent landmark and this dominance within the landscape was likely another reason why the hill was chosen as a location for a defensive site. The visual relationship between the hillfort and the surrounding landscape greatly contributes towards the aesthetic value of the asset as it allows for the siting, form and function of the hillfort to be understood and appreciated.

6.46 Additionally of importance to its defensive function is its likely relationship with other broadly contemporary assets within the surrounding landscape. This includes the hillfort known as Bathampton Camp c.2.5km to the south of the asset, on the opposite side of the valley create by the River Avon. Due to the prominent position of both of these hillforts within the landscape and the lack of intervening topography views between these two assets are clear and the relationship between the two assets can be easily understood and appreciated despite the encroaching development of the east of Bath and Bathampton around the base of the Bathampton Camp hillfort altering the experience of this relationship. Therefore the proximity of these two assets to each other and sight lines and intervisibility afforded by the low-lying landscape which surrounds them both is a key element of the setting for the slight univallate hill 190m northwest of Westleigh.

Contribution of the Site to asset's significance

6.47 The Site forms part of the wider landscape surrounding the asset which contributes to its aesthetic value. Additionally the Site is visible within key views looking southwards from the asset towards the broadly contemporary Bathampton Camp hillfort. Therefore the Site does provides some contribution to the significance of the asset. However this contribution has been somewhat reduced by the existing development visible within these south facing views as a result of the existing settlement activity associated with the east of Bath and Bathampton. This development activity reduces the ability to appreciate the topography of the area, which was likely a key reason behind the siting of the hillfort.

Sensitivity to development of the Site

6.48 The sensitivity of the Slight univallate hillfort 190m northwest of Westleigh to the proposals is **medium**.

6.49 As part of the lower lying valley at the base of the hill on which the hillfort is located, the Site does form part of the asset's setting which contributes to its significance. It is likely that any development within the Site will have intervisibility with the asset. However the sensitivity of the assets is reduced by the presence of existing development activity which is currently present within the area to the south of the hillfort.

Potential for harm to the asset

6.50 As the proposals do not include works that would cause physical harm to the asset, the potential for harm is limited to a change in the setting of the asset.

Therefore, evidential value of the asset deriving from the importance of its buried archaeological remains would be unaffected by the development of the Site.

6.51 Development within the Site would represent the further encroachment of settlement activity into the asset's setting. This would introduce an additional potentially incongruous modern residential development into views from the hillfort, resulting in the potential for harm to the aesthetic value of the asset. This would also bring the settlement edge slightly closer to the asset, reducing the 'breathing space' between the asset and the surrounding suburbs of Bath. However while the Site would introduce additional development within the southern part of the asset's setting, this area has already been much disturbed by the existing settlement activity. As such the potential for harm is slightly reduced as development within the Site would likely appear as a small extension to the existing activity, rather than adding a new element into the landscape.

6.52 Therefore the potential for harm to the asset as a result of the development of the Site would be **medium-low**.

Level of effect

6.53 The development of the Site would have a **low** level of effect on the Slight univallate hillfort 190m northwest of Westleigh , which would likely equate to **less than substantial harm** to the asset.

Batheaston Conservation Area and associated listed buildings

Summary

6.54 The settlement of Batheaston is thought to have potentially been the result of the merger of two royal estates during the Saxon period. The Domesday book also records the settlement as being under two owners, the King and the Bath Abbey of St Peter. The main area of the settlement follows along three roads now known as the High Street, London Road East and Northend. There are 35 listed buildings within the conservation area, all of which are Grade II listed and are mostly residential dwellings.

Table 6.3: Batheaston Conservation Area and associated listed buildings summary table

Importance	Type of change	Sensitivity	Risk of harm	Level of effect
High	Setting change	High	Medium	Low
High	Setting change	High	Medium	Less than substantial harm

Significance

6.55 The significance of Batheaston Conservation Area and associated listed buildings is drawn from the following values:

- **Historic value:** The asset primarily derives significance from its historical value as a settlement of originally medieval origin.
- **Aesthetic value:** The assets has architectural value due to the large number of historic buildings within the designated area, many of which are listed buildings.

6.56 The importance of this asset is therefore **high**.

Contribution of setting

6.57 The agricultural surroundings of the village also contribute to the significance of the conservation area as Batheaston was historically primarily an agricultural settlement. The rural landscape currently surrounding the conservation area reflect its historic setting and provide the ability understand and appreciate the historic landscape within which the settlement development. As such views outwards towards the agricultural landscape from the conservation area do provide some contribution the asset's significance as they allow for an experience of the asset as an agricultural settlement. These views are somewhat limited across the conservation area due to the vegetation surrounding historic core of the settlement, however they are possible from some locations such as moving southwards along Northend near the junction with the High Street and London Road East.

6.58 Other views which are of importance to the significance of the conservation area are those located along the main approaches to the settlement. These are along the

three key streets of London Road East (approaching the settlement from the east), High Street (approaching the settlement from the west) and Northend (approaching the settlement from the north). These dynamic views show the largely linear historic core of the settlement appearing and there is a clear distinction and boundary between the historic buildings within the designated area and the more modern buildings outside it.

6.59 The element of setting which contributes to the significance of the listed buildings within the conservation area is their location within the historic core of Batheaston. It is from within the settlement that the historic and architectural value of these structures can be best understood, appreciated and experienced. As such the wider setting of these assets provides limited contribution to their significance

Contribution of the Site to asset's significance

6.60 The Site is located immediately to the north-west of the Batheason Conservation Area, with the boundary of the conservation area bordering the south-eastern boundary of the Site. The Site forms part of the setting of the conservation area as part of wider agricultural landscape within which the village of Batheaston is located, reflecting the historic context within which the settlement has developed. However, due to intervening vegetation which is located along the Site's south-eastern boundary, there is limited intervisibility between the Site and the designated area limiting the ability to understand, appreciate or experience historic relationship between the Site and these assets. Therefore, the Site makes only a limited contribution to the significance of the assets.

Sensitivity to development of the Site

6.61 The sensitivity of the Batheaston Conservation Area and listed buildings to the proposals is **medium**.

6.62 While the Site in its current use makes only a limited contribution the significance of these assets, due to the close proximity of the Site to the conservation area it remains sensitive to development.

Potential for harm to the asset

6.63 The Site's proximity to the asset means there is some potential for development to result in harm to the Batheaston Conservation Area. The development of the Site would result in the loss of part of the agricultural landscape surrounding the settlement of Batheaston, which is forms part of its setting that contributes to its

significance. However the lack of intervisibility between the Site and the asset reduces this potential for harm as this reduces the possibility for development to result in changes which affect the way in which the historic and aesthetic value of the asset can be understood, appreciated or experienced. Therefore there is a **medium** potential for harm to the asset as a result of the proposals.

Level of effect

6.64 The development of the Site would have a **low** level of effect on the Batheaston Conservation Area and listed buildings, which would likely equate to **less than substantial harm** to the asset.

Bath Conservation Area

Summary

6.65 Bath Conservation Area was designated in 1968 as six separate areas then enlarged and combined as a single area in 1973. The designated area covers the current extent of the city of Bath as well as parts of the green landscape surrounding the city which were identified within the Bath City-Wide Character Appraisal (Bath and North East Somerset Planning Services 2005) as contributing "significantly to the setting and character of the city".

Table 6.4: Bath Conservation Area summary table

Importance	Type of change	Sensitivity	Risk of harm	Level of effect
High	Setting change	Medium	Medium	Low
High	Setting change	Medium	Medium	Less than substantial harm

Significance

6.66 The significance of Bath Conservation Area is drawn from the following values:

- **Evidential value:** Bath Conservation Area derives its evidential value from both its exceptional archaeological resource and the survival of its historic built fabric. Beneath the modern city lies a remarkably well-preserved archaeological record spanning over two millennia, including internationally significant remains associated with the Roman baths, sacred thermal springs, temple complex, and wider settlement. These buried deposits provide invaluable evidence for understanding the development of Bath from the Roman period onwards. Above ground, the widespread use of locally quarried oolitic Bath Stone preserves a tangible record of the city's architectural evolution, craftsmanship, and construction techniques. The survival of buildings and structures from the medieval, Georgian, Victorian, and later periods enables the study of changing architectural styles, urban planning principles, and engineering practices, contributing substantially to our understanding of Bath's historic development and cultural significance.
- **Historical value:** The historical value of the Bath Conservation Area lies in its exceptional ability to illustrate the city's evolution from a Roman spa settlement into one of the most celebrated social, cultural, and therapeutic centres of the Georgian period. The historic townscape preserves the results of ambitious eighteenth-century urban planning, exemplified by internationally renowned developments such as the Circus, Royal Crescent, and Queen Square, which demonstrate innovative approaches to architectural design, speculative development, and the creation of a cohesive urban environment. The city's streets, buildings, and public spaces provide a tangible record of Bath's prominence as a fashionable destination for health, leisure, and society during the eighteenth and nineteenth centuries. The Conservation Area also retains

strong associations with influential figures including Jane Austen, Beau Nash, and architects John Wood the Elder and John Wood the Younger, whose contributions helped shape Bath's distinctive character and enduring cultural significance.

- **Aesthetic value:** The aesthetic value of the Bath Conservation Area derives from the exceptional coherence of its historic townscape and its harmonious integration with the surrounding landscape. The city is renowned for the consistent use of locally quarried Bath Stone, which creates a distinctive visual unity across its streets, terraces, crescents, and public spaces. This architectural composition is exemplified by the elegant Georgian town planning of the eighteenth century, including grand terraces, sweeping crescents, formal squares, and carefully designed streetscapes that reflect the principles of classical architecture. Equally important is Bath's dramatic topographical setting within a natural bowl of surrounding hills, which allows for extensive views both into and out of the city. The close relationship between the built environment and the green hillsides creates a series of memorable panoramas and townscape vistas, contributing to the city's unique sense of place and establishing the iconic visual character for which Bath is internationally recognised.

6.67 The importance of this asset is therefore **high**.

Contribution of setting

6.68 The main elements of the conservation area's setting which contribute to its significance include those which help better understand the historic development of the city of Bath. The city of Bath sits within a valley with green hills rising above it and this distinctive topography is one of the key characteristics which has influenced the development of Bath. Despite a large amount of expansion since the original Roman settlement core beside the River Avon, the settlement has retained a strong relationship with its surrounding landscape and the green hillsides surrounding the city are visible within numerous views from across the Bath Conservation Area. These views of the conservation area and its setting contribute strongly to its aesthetic value and would be considered key views.

6.69 Other key elements of the setting of the conservation area includes other historic associations which relate to key periods throughout the settlement's development, most notably those relating to the Roman and Georgian periods. These could include archaeological site such as Roman villas which provide an improvement understanding of the wider Roman landscape to which Bath belonged. Georgian site could include notable buildings, walks or rides which reflect an

intention for the enjoyment of the natural landscape and appreciation of its picturesque qualities.

6.70 Key routes into and out of the city are also an important element of the asset's setting as they reflect the intended historic approach to the settlement. These routes include Roman roads, such as the Fosse Way, which were strategically important for the siting of the original settlement. They also include the later roads, with the main method for travelling to Bath during the Georgian period was by road and in most cases provided visitors with their first glimpse of the city. Another key access route to the city of Bath was the Kennet and Avon Canal, which was possible from Bristol from 1727 and from London from 1810. The expansion of the canal is part of the Georgian town planning of Bath and therefore also contributes to the significance of the conservation area.

Contribution of the Site to asset's significance

6.71 The Site is located to the north-east of the Bath Conservation Area, forming part of its wider setting. The Site is located along the Fosse Way Roman road, the primary route linking Exeter to Lincoln, and the Batheaston section served as a direct northern pipeline into the settlement at Bath. Therefore the Site has formed part of one of the key approaches to Bath since the Roman period. Historically the road has passed through an undeveloped or sparsely developed landscape, which allows the route to be read as a coherent historic feature within the landscape. The Site is separated from the route by vegetation and a boundary wall which act as a division within the landscape, physically and visually separating the Site from the asset and as such the land within the Site cannot currently be experienced from the road.

6.72 There is limited intervisibility between the Site and the asset and as such it does current form part of the asset's setting which would allow for a good understanding, appreciation or experience of the asset. As such the Site currently provides limited contribution to the significance of the asset.

Sensitivity to development of the Site

6.73 The sensitivity of the Bath Conservation Area and listed buildings to the proposals is **medium**.

6.74 While the Site in its current use makes only a limited contribution the significance of these assets, due to the close proximity of the Site to the conservation area it remains sensitive to development.

Potential for harm to the asset

6.75 The Site's proximity to the asset means there is some potential for development to result in harm to the Bath Conservation Area. The development of the Site would result in the loss of part of the agricultural landscape surrounding Bath, which forms part of its setting that contributes to its significance. However the lack of intervisibility between the Site and the asset reduces this potential for harm as this reduces the possibility for development to result in changes which affect the way in which the historic and aesthetic value of the asset can be understood, appreciated or experienced. Therefore there is a **medium** potential for harm to the asset as a result of the proposals.

Level of effect

6.76 The development of the Site would have a **low** level of effect on the Bath Conservation Area and listed buildings, which would likely equate to **less than substantial harm** to the asset.

Field End (1320523) and associated The Lodge, comprising north, south, east and west lodges (1115216)

Summary

6.77 The Grade II listed Field End comprises a detached house of late c.18th century origin, with alterations dating to the mid-19th century. The Grade II listed lodge building is located c.120m south-west of Field End and is thought to likely be associated with the main house to its north-east. The lodge is also of late c.18th century date with mid-19th century alterations, with extensions to the rear and right comprising a former coach house, stables and outbuildings. The lodge is currently in use as flats.

Table 6.5: Field End summary table

Importance	Type of change	Sensitivity	Risk of harm	Level of effect
High	Setting change	Low	Low	Low
High	Setting change	Low	Low	Less than substantial harm

Significance

6.78 The significance of the two Grade II listed buildings is drawn from the following values:

- **Historical value:** The assets have historical (illustrative) value as a 18th century house and associated lodge, demonstrating the use of the landscape during this time.
- **Aesthetic value:** The significance of the listed buildings derives primarily from their architectural value as good examples of a 18th century house and associated lodge.

6.79 The importance of this asset is therefore **high**.

Contribution of setting

6.80 The key elements of setting for the house are the associated grounds which have been designed around it and ancillary structures, such as the Lodge and the other structure to the west of main building of unclear function, which have a direct functional relationship with the main Field End house. Similarly, the key element of the Lodge's setting is its relationship with the main Field End structure, which it was designed to serve and its placement within the grounds surrounding the main house.

6.81 The grounds associated with Field End are clearly defined and feature a large amount of dense vegetation, which is visible on historic maps as well as being the current surroundings of the assets. This creates a sense of enclosure and privacy, intentionally separating the assets from much of their wider surrounding. Therefore the wider surrounding landscape contributes little to the significance of these assets.

6.82 One element of the assets' wider setting which is also an important part of their setting is their location along London Road West, which forms a main route into Bath approaching the city from the east. This placement was likely intentional to allow the occupants of the main house to maintain good connectivity with the city, while remaining separated from the business of the city centre.

Contribution of the Site to asset's significance

6.83 Located c.30m to the east of Field End house and c.100m east of the Lodge, the Site does form part of the assets' wider surroundings. However there is limited intervisibility between the Site and these assets due to the dense vegetation within the associated grounds. Additionally, due to the intentional enclosure of the grounds and their deliberate separation from their wider surroundings, the wider setting of these assets contributes little their significance and therefore the Site makes little contribution to the significance of these assets.

Sensitivity to development of the Site

6.84 The sensitivity of these two listed buildings to the proposals is **low**.

6.85 While the Site is located within close proximity to the assets it provides limited contribution to their significance due to the heavy screening preventing intervisibility between the asset and the Site. As such this separation and lack of intervisibility significantly reduce the sensitivity of the assets to development.

Potential for harm to the asset

6.86 Despite the Site's close proximity to the assets there is limited potential for harm. The Site does not currently form a key part of their setting and the loss of the agricultural and within the Site would have no impact on the assets. It is unlikely that residential development of a standard height would be visible from the assets due to the dense and tall vegetation screening. Therefore there is a **low** potential for harm to these assets as a result of the proposals. Should this screening be remove, however, the potential for harm would be significantly increased.

Level of effect

6.87 The development of the Site would have a **low** level of effect on the Bath Conservation Area and listed buildings, which would likely equate to **less than substantial harm** or **no harm** to the asset.

Setting effects to WHS

6.88 The Site is located within the area which has been identified to be part of the setting of the WHS, located close to the northeastern boundary of the WHS itself.

6.89 The Site may be visible in long distance views of the WHS, as indicated by the ZTVs for the WHS Setting SPD (B&NES, 2012) (for example Viewpoint 11 Camden Crescent and Viewpoint 22 Area Visible from the Viewpoint at Ralph Allen's Carriage Drive / Bathampton Down). The location of the Site c.30m to the east of the WHS and its currently undeveloped nature means that it does contribute to OUV, in particular to the attribute ‘the green setting of the city in a hollow in the hills’.

6.90 However, the Site is located in an area of low elevation at the foothills of elevated land which forms part of the Cotswold Plateaux and Valley and is not located on one of the important green hillsides or skyline. Therefore, while the development within the Site would create a change to the green, undeveloped hillside in this part of the setting of the WHS, it is likely that this change would be fairly imperceptible in long distance views out of the WHS. Development of the Site would likely be perceived as a slight extension to the existing development at Batheaston and viewed as part of the existing settlement which would minimise the development’s ability to affect OUV. No other attributes of OUV would be affected. This would create a **low** level of harm, and a **medium** effect.

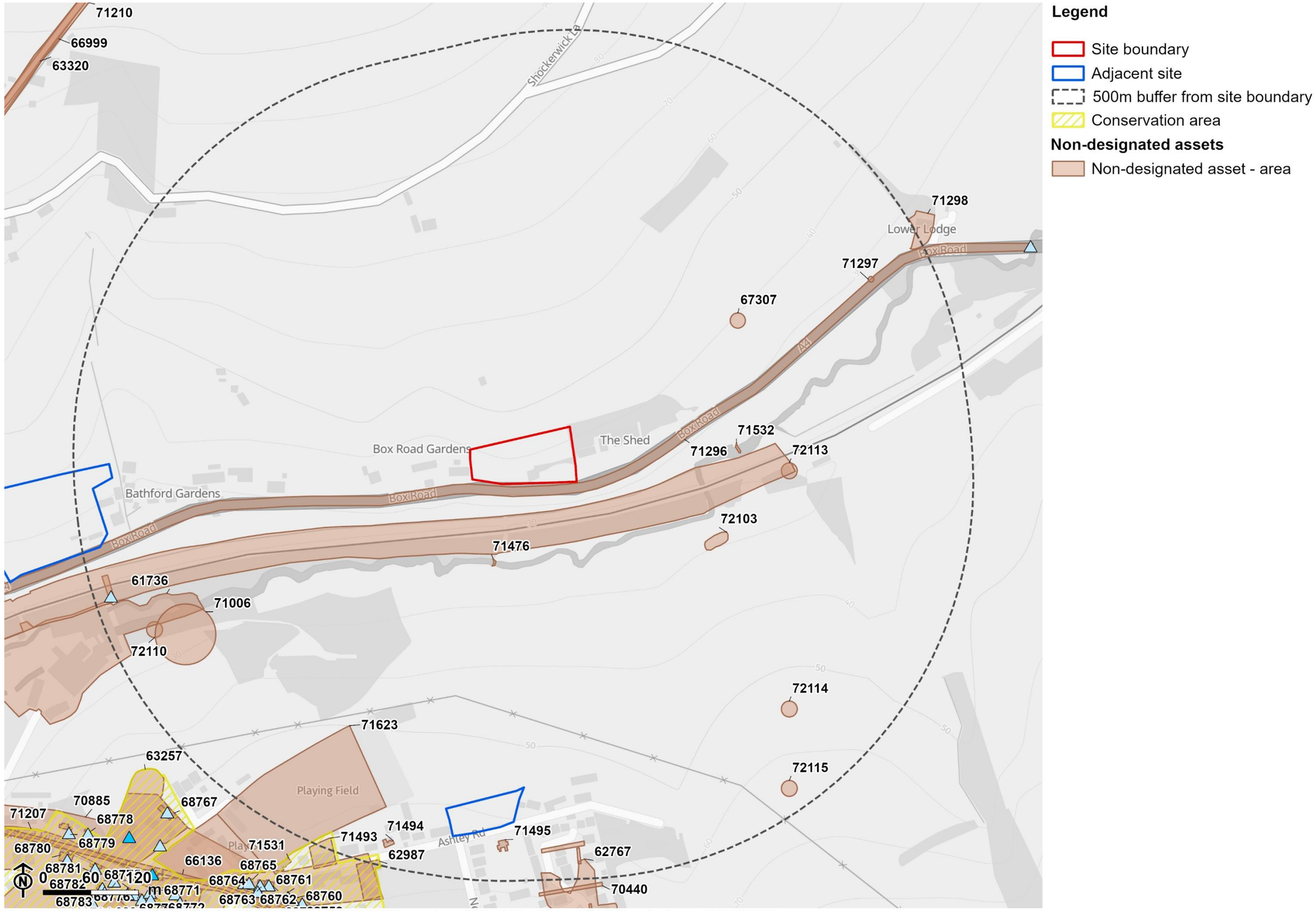
Box Road

Site description

6.91 The Site is located on the northern side of Box Road (the A4), c.800m northwest of Bathford. The Site was previously in use as a fruit farm and contains rows of fruit trees and an area of hardstanding in the southern part of the Site.

6.92 The Site, designated assets and non-designated assets are shown on **Figure 6.3.**

Figure 6.3: Box Road



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Designated heritage assets within the Site

6.93 There are no designated assets within the Site.

Interactions with WHS

6.94 The Site is not located within the City of Bath WHS, although it does lie within its setting.

Non-designated heritage assets

6.95 There are no non-designated heritage assets within the Site.

Archaeological potential

6.96 No archaeological investigations have been undertaken within the Site.

6.97 Previous archaeological investigations within the vicinity of the Site include a trial trench evaluation c.450m to the south-east which attempted to locate a possible medieval manor, recorded via documentary evidence to be located in this area. However, no archaeological features or artefacts older than the 19th century were identified (HER Ref. 70440).

6.98 There are several post-medieval or later assets recorded within the area surrounding the Site, these include:

- Bathford Spa, Bathford (HER Ref. 72110): a mineral spring identified by John Wood in 1742 in his Essays towards a Description of the City of Bath
- Bathford Paper Mill or Trevano Mill, S of Box Road, Bathford (HER Ref. 61736): one of the few survivors of a widespread industry in Avon, although largely rebuilt in the 20th century
- Several WWII defence site recorded to the east of the Site during parish survey in 1982, nature is unclear and do not appear to extant (HER Refs. 72113, 72114, 72115) as well as a pillbox HER Ref. (67307), although the HER entry for the pillbox notes the location may be a mistake.

6.99 Current evidence suggests a low archaeological potential for the Site. It is likely that activity relating to the fruit farm within the Site may have truncated any buried remains, either through the farming processes or the surfacing activity within the

south-east of the Site. However, with the lack of previous investigations within the surrounding area the archaeological potential does remain somewhat uncertain and it is likely further investigation will be needed to confirm the archaeological potential of the Site.

Historic landscape character

6.100 The historic landscape character of the Site is recorded as late medieval open fields created by local arrangement and exchange.

Heritage assets with the potential to experience setting change

6.101 The following designated heritage assets have been identified as having the potential to experience effects to significance due to development within the Site as a result of changes to setting:

- Bathford Conservation Area
- City of Bath WHS

Bathford Conservation Area

Summary

6.102 Bathford Conservation Area is located c.480m northwest of the Site. It covers the historic core of Bathford along Church Street and the High Street, along with a separate area covering Prospect Place to the east of the main settlement.

Table 6.6: Bathford Conservation Area summary table

Importance	Type of change	Sensitivity	Risk of harm	Level of effect
High	setting change	Low	Low	Low
High	setting change	Low	Low	Less than substantial harm

Significance

6.103 The significance of Bathford Conservation Area is drawn from the following values:

- **Evidential value:** Bathford is believed to have medieval origins and derives evidential value from its potential to retain evidence of its historic settlement and land use.
- **Historical value:** as an example of a medieval settlement pattern and linear form, reflective of gradual organic development over time, with surviving street plan and layout.
- **Aesthetic value:** derived from its well-preserved examples of 18th and 19th century housing, built using Bath stone ashlar, rubble stone walls and slate or clay tiled roofs. Notable historic buildings include Shockerwick House (NHLE ref. 1157865) and Warleigh Manor, showcasing mock Gothic and classical styles. The village's streets, such as Ostlings Lane, are valued for their narrow, verdant appearance and low-density development, which contribute to the area's distinctive rural character.

6.104 The importance of this asset is therefore **High.**

Contribution of setting

6.105 Elements of setting which contribute to the significance of the asset include the location of the ford around which the settlement developed, thought to be located c.1.1km from the Site at ST 785 665 (62666). Other key developments associated with Bathford include the mineral spring and adjoining mill that became known as 'Bathford Spaw' in the 18th century, this mill (later named Trevano Mill) and mineral spring are located c.420m to the south-west of the Site. The agricultural surroundings also contribute to Bathford's significance as a historically agricultural settlement, although these fields which contribute most are those immediately surrounding the settlement and which are visible in view from the within the historic core looking outwards across the surrounding area.

6.106 The Site is separated from the asset by the A4 and Great Western Railway line, both of which appear as early as the 1839 tithe map, these act as a division within the landscape, physically separating the Site from the historic settlement of Bathford.

Sensitivity to development of the Site

6.107 The sensitivity of Bathford Conservation Area to the proposals is **low**. The Site is located some distance from the conservation area and is physically separated by the A4 and the Great Western Railway line which forms a barrier between the two. The Site does not lie within the immediate setting of the conservation area, nor does it contribute towards its significance.

Potential for harm to the asset

6.108 Development within the Site is unlikely to cause harm to the setting of the Bathford Conservation Area. The significance of the conservation area is derived from its evidential, historical and aesthetic values and these would not be affected by development within the Site.

Level of effect

6.109 The development of the Site would have a low level of effect on the Bath Conservation Area, which would equate to less than substantial harm to the asset.

Setting effects to WHS

6.110 The Site is located within the area which has been identified to be part of the setting of the WHS.

6.111 The Site may be visible in long distance views of the WHS, as indicated by the ZTVs for the WHS Setting SPD (B&NES, 2012) (for example Viewpoint 11 Camden Crescent and Viewpoint 22 Area Visible from the Viewpoint at Ralph Allen's Carriage Drive / Bathampton Down). The location of the Site within the identified setting of the WHS and its current undeveloped nature means that it does contribute to OUV, in particular to the attribute ‘the green setting of the city in a hollow in the hills’.

6.112 However, the Site is located in an area of low elevation at the foothills of elevated land which forms part of the Cotswold Plateaux and Valley and is not located on one of the important green hillsides or skyline. Development within the Site would create a change to the green, undeveloped hillside in this part of the wider setting of the WHS, but it is likely that this change would be fairly imperceptible in long distance views out of the WHS. Development of the Site would likely be perceived as a slight extension of the existing development at Batheaston and viewed as part of the existing settlement which would minimise the development’s

ability to affect OUV. No other attributes of OUV would be affected. This would create a **low** level of harm, and a **medium** effect.

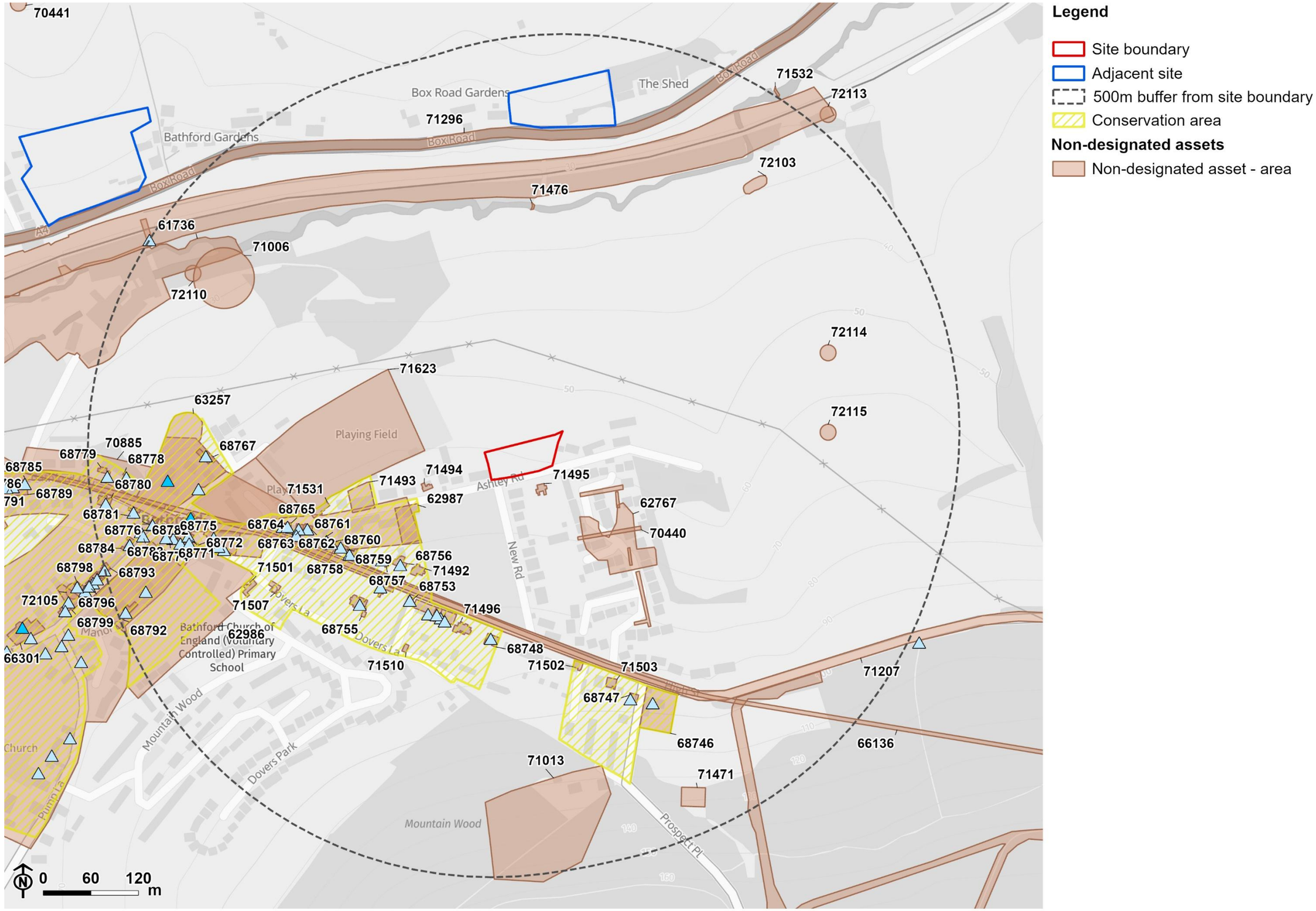
Ashley Road

Site description

6.113 The Site currently occupies a sub-rectangular field to the northeast of Bathford. To the north, the Site is bordered by a series of fields with the A4 and the railway line to the north. To the east, west and south lies residential development and allotments which form part of the settlement at Bathford.

6.114 The Site, designated assets and non-designated assets are shown on **Figure 6.4.**

Figure 6.4: Ashley Road



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Designated heritage assets within the Site

6.115 There are no designated assets within the Site.

Interactions with WHS

6.116 The Site is not located within the City of Bath WHS, although it does lie within its setting.

Non-designated heritage assets

6.117 There are no non-designated assets within the Site.

Archaeological potential

6.118 No archaeological investigations have been undertaken within the Site.

6.119 Previous archaeological investigations within the vicinity of the Site include a trial trench evaluation c.50m to the south-east which attempted to locate a possible medieval manor, recorded via documentary evidence to be located in this area. However, no archaeological features or artefacts older than the 19th century were identified (HER Ref. 70440).

6.120 The Roman road from Batheaston to Wickham (HER Ref. 66136) is recorded c.160m south of the Site. Some areas along the route of this road are visible as earthworks, however the section of road nearest the Site largely follows the route of the existing High Street and therefore there is no above ground evidence of the Roman road.

6.121 Medieval activity within the area mostly relates to the settlement at Bathford c.110m west of the Site (HER Ref. 70885). The village is of medieval origin and saw development throughout the post-medieval period.

6.122 Other post-medieval and later activity within the surrounding area includes:

- Bathford Spa, Bathford (HER Ref. 72110): a mineral spring identified by John Wood in 1742 in his Essays towards a Description of the City of Bath

- Bathford Paper Mill or Trevano Mill, S of Box Road, Bathford (HER Ref. 61736): one of the few survivors of a widespread industry in Avon, although largely rebuilt in the 20th century
- WWII defence site recorded to the east of the Site during parish survey in 1982, nature of defensive activity is unclear and the two sites do not appear to extant (HER Refs. 72114, 72115).

6.123 The proximity of the Site to a possible Roman road and a medieval settlement indicates there is some potential for archaeological remains to be present within the Site. It is likely any remains within the Site would relate to its agricultural use. However, with the lack of previous investigations within the surrounding area the archaeological potential does remain somewhat uncertain and it is likely further investigation will be needed to confirm the archaeological potential of the Site.

Historic landscape character

6.124 The historic landscape character of the Site is recorded as late medieval open fields created by local arrangement and exchange.

Heritage assets with the potential to experience setting change

6.125 The following designated heritage assets have been identified as having the potential to experience effects to significance due to development within the Site as a result of changes to setting:

- Bathford Conservation Area
- City of Bath WHS

Bathford Conservation Area

Summary

6.126 Bathford Conservation Area is located c.100m west of the Site. It covers the historic core of Bathford along Church Street and the High Street, along with a separate area covering Prospect Place to the east of the main settlement.

Table 6.7: Bathford Conservation Area summary table

Importance	Type of change	Sensitivity	Risk of harm	Level of effect
High	Setting change	Low	Low	Low
High	Setting change	Low	Low	Less than substantial harm

Significance

6.127 The significance of Bathford Conservation Area is drawn from the following values:

- Evidential value: Bathford is believed to have medieval origins and derives evidential value from its potential to retain evidence of its historic settlement and land use.
- Historical value: as an example of a medieval settlement pattern and linear form, reflective of gradual organic development over time, with surviving street plan and layout.
- Aesthetic value: derived from its well-preserved examples of 18th and 19th century housing, built using Bath stone ashlar, rubble stone walls and slate or clay tiled roofs. Notable historic buildings include Shockerwick House (NHLE ref. 1157865) and Warleigh Manor, showcasing mock Gothic and classical styles. The village's streets, such as Ostlings Lane, are valued for their narrow, verdant appearance and low-density development, which contribute to the area's distinctive rural character.

6.128 The importance of this asset is therefore **High.**

Contribution of setting

6.129 Elements of setting which contribute to the significance of the asset include the location of the ford around which the settlement developed, thought to be located c.1.1km from the Site at ST 785 665 (62666). Other key developments associated with Bathford include the mineral spring and adjoining mill that became known as 'Bathford Spaw' in the 18th century, this mill (later named Trevano Mill) and mineral

spring are located c.420m to the south-west of the Site. The agricultural surroundings also contribute to Bathford's significance as a historically agricultural settlement, although these fields which contribute most are those immediately surrounding the settlement and which are visible in view from the within the historic core looking outwards across the surrounding area.

Contribution of site to assets significance

6.130 The Site forms part of the settlement's agricultural surrounding but sits in an area of lower elevation than much of the green hills of the surrounding countryside. As such, the Site is not visible from most locations within the conservation area and therefore while development would change the use of the Site from an agricultural field to a more urban character it would not change the experience of the asset from most locations. The Site is visible on approach to the conservation area along Ashley Road, but while this is an approach to the conservation area it is not the main approach which historic maps suggest would have been along the High Street or from Bathford Road. Additionally, the Site is separated from the conservation area to both the west and south by modern development and therefore any views of the Site on approach to the conservation area are interrupted by this later development. Therefore, while the Site does form part of the agricultural surroundings of the conservation area it is not specifically contributing to the significance of the asset.

Sensitivity to development of the Site

6.131 The sensitivity of Bathford Conservation Area to the proposals is **low.** Development of the Site may alter the rural character and setting of the northwestern part of the conservation area. However, due to intervening development between the asset and the Site, new development would likely be experienced via glimpsed views from within the conservation area looking northwest and would not largely affect the character and appearance of the conservation area or its setting as a whole.

Potential for harm to the asset

Development within the Site is unlikely to cause harm to the setting of the Bathford Conservation Area. Although the Site is in close proximity to the asset and would result in a change to its setting, it would not fundamentally affect its character or appearance. The significance of the conservation area is derived from its evidential, historical and aesthetic values and these would not be affected by development within the Site.

Level of effect

6.132 The development of the Site would have a **low** level of effect on the Bathford Conservation Area, which would equate to **less than substantial harm** to the asset.

Setting effects to WHS

6.133 The Site is located within the area which has been identified to be part of the setting of the City of Bath WHS. As part of a field, the Site forms part of the green setting of the city, which is a characteristic of its OUV, specifically under the element of the being part of the "open agricultural landscape around the city edges in particular grazing and land uses which reflect those carried out in the Georgian period". The Site may be visible in long distance views of the WHS, as indicated by the ZTVs for the setting study (for example Viewpoint 22 Area Visible from the Viewpoint at Ralph Allen's Carriage Drive / Bathampton Down).

6.134 However, due to the Site's small size and distance from the centre of the WHS as well as the modern development which currently surrounds the Site to the west and south, it is likely the Site would not be easily identifiable from key locations within the WHS and any views would be glimpsed and provide little contribution to its OUV. Additionally, while part of the rural landscape surrounding Bath, the Site's proximity to the separate village of Bathford suggests it likely had a stronger historical/functional relationship with this village than with the Bath itself, further reducing its contribution to the WHS.

6.135 The Site has a high sensitivity/risk of harm rating due to its location within the area identified as part of the WHS setting and the fact that it forms part of the green setting of the city, a characteristic of OUV. However, due to its small footprint size and low lying topography, the Site is largely not visible within most long distance views from the WHS.

6.136 The likely effect to OUV is therefore **none.**

Chapter 7
West of Bath

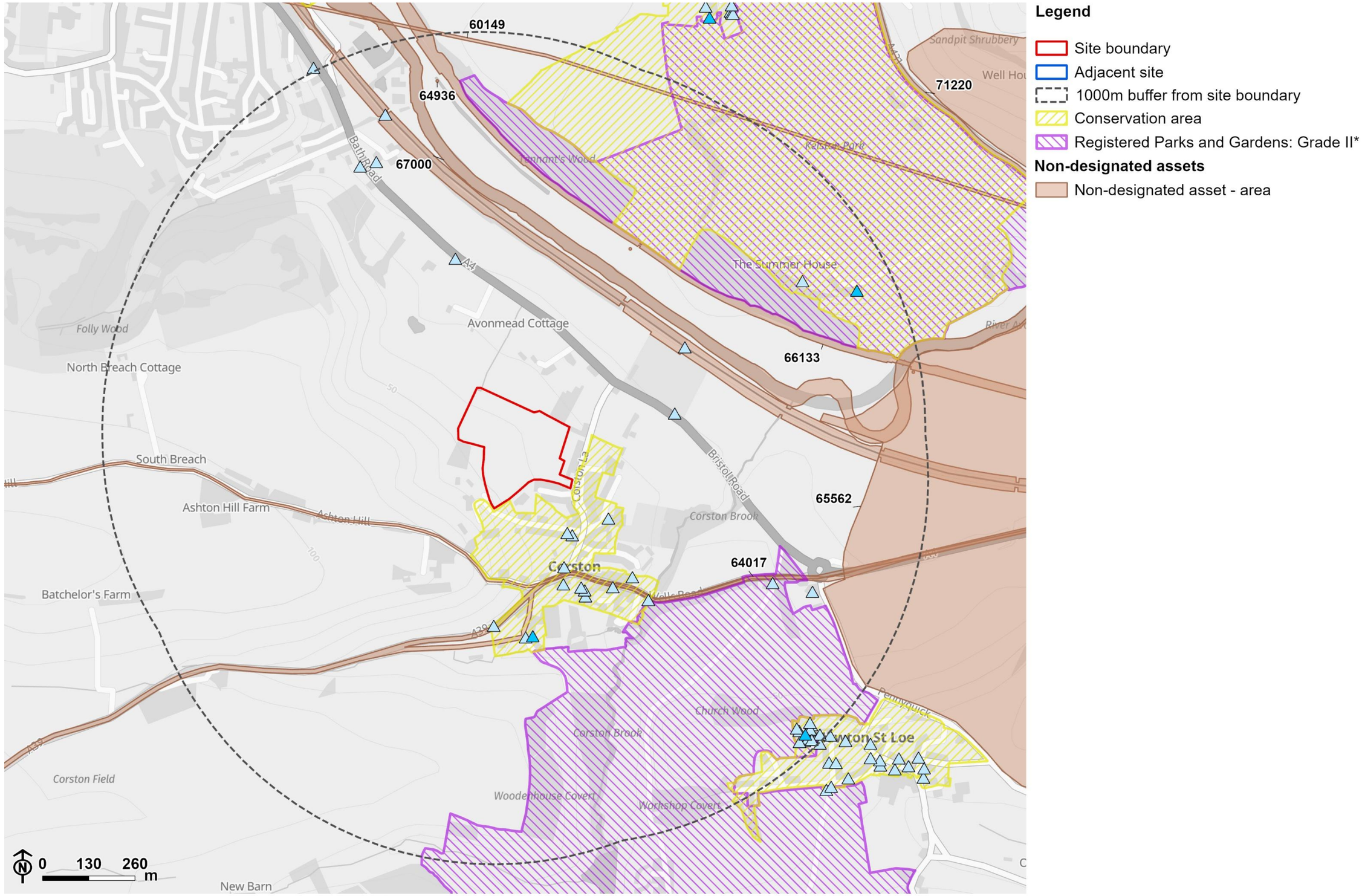
Corston 1

Site description

7.1 The Site is located north-west of the historic village of Corston and south-west of the River Avon and comprises of open arable farmland. It occupies a gentle undulating field that slopes from the south-west to the north-east.

7.2 The Site, designated assets and non-designated assets are shown on **Figure 7.1.**

Figure 7.1: Corston Site 1



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Designated heritage assets within the Site

7.3 There are no designated heritage assets within the Site.

Interactions with the WHS

7.4 The Site is not located within the City of Bath WHS, although it does lie within its setting.

Non-designated heritage assets

7.5 There are no non-designated heritage assets within the Site.

Archaeological potential

7.6 There are no events or findspots located within the Site that can aid in assessing its archaeological potential. The closest archaeological investigation was a geophysical survey located to the north-east of Newton-St-Loe between 2009-2011. This resulted in the possible identification of two adjacent settlements of unknown date, consisting of anomalies that represented ditches, trackways and roundhouses (HER Ref. 65562).

7.7 Situated to the south of the Site and below Corston Conservation Area is believed to be the location of a former Roman road from Bath to Bristol (HER Ref. 67021). Corston village is believed to owe its origins to the Saxon period (HER Ref. 64007).

7.8 Given the proximity to the Roman road, and the settlement which likely derives its origins to the Saxon period, the archaeological potential of the Site is considered to be **Moderate to High.**

Historic landscape character

7.9 The historic landscape character of the Site is post-medieval planned enclosure, which is consistent with the wider field-system that likely derives its origins from an earlier open-field system.

Heritage assets with the potential to experience setting change

Kelston Park (1215080) and Kelston Park RPG II* (1000536)

Summary

7.10 Kelston Park is a grand country house constructed sometime between c.1567 and c.1574. The surrounding parkland, also known as Kelston Park, was not formally laid out until 18th century, however, when Lancelot Brown was employed to landscape the park around the mansion. The parkland covers an area of c.75ha and forms a large section of the countryside between the Bath and Bristol conurbations.

Table 7.1: Kelston Park and Kelston RPG effects summary table

Importance	Type of change	Sensitivity	Risk of harm	Level of effect
High	Setting change	High	High-Medium	Medium
High	Setting change	High	High-Medium	Less than substantial harm

Significance

7.11 The significance of Kelston Park and Kelston Park RPG is drawn from the following values:

- **Evidential value**: The assets both have evidential value given their location and association with the former medieval manor house and its potential to provide further understanding of manorial land use, settlement and organisation.
- **Historical value**: Kelston Park is an excellent example of a well-preserved Georgian country house, dating to the c.1760s. Its survival demonstrates the wealth, status, and aspirations of the eighteenth-century landed and professional elite. Both the house and the wider Registered Park and Garden also possess strong historical (associative) value, with the house designed by the renowned Georgian architect John Wood the Younger and the surrounding

landscape attributed to the celebrated landscape designer Lancelot Capability Brown.

- **Aesthetic value**: Kelston Park country house has aesthetic (designed) value derived from its Georgian classical architecture, which exhibits symmetry and elegance characteristic of the period. Contributing to this is the aesthetic value of the surrounding designed RPG, which was composed to create a natural idealised setting for the house, with designed marked views.

7.12 The importance of this asset is therefore **High.**

Contribution of setting

7.13 The country house and RPG occupy a prominent position on the edge of the escarpment, deliberately sited to command panoramic views across the River Avon valley.

Contribution of the Site to asset's significance

7.14 One of the principal contributions to the assets aesthetic (designed) value, is the continued survival of the largely undeveloped rural setting surrounding the listed building and RPG. This allows the assets to be appreciated within their intended landscape context, maintaining important visual, historical and functional relationships.

Sensitivity to development of the Site

7.15 Development within the Site would likely be visible in views from the park to the south. However, the house and south terraces are primarily oriented towards the south-east, such that the principal designed views are directed away from the Site and towards the River Avon and the immediate rural landscape in this direction. Given the elevated escarpment position of the house, panoramic views form an important component of its overall significance. Development within the Site would not fundamentally alter the principal designed views from the house or park, but it would result in a degree of harm to the wider panoramic views that contribute to the assets' setting and experience. Therefore, the sensitivity to the development of the Site is **high.**

Potential for harm to the asset

7.16 There would be limited or no harm to the assets' principal designed views; however, development would be visible in wider panoramic views experienced from the house and parkland. This would result in a degree of adverse change to the experiential and aesthetic appreciation of the rural landscape setting. Overall, potential for harm to Kelston Park and the RPG arising from a change to its setting is considered to be **medium**.

Level of effect

7.17 The development of the Site would have a **medium** level of effect on the Kelston Park and Kelston Park RPG, which would equate to **less than substantial harm** to the asset

Corston Conservation Area and Listed Buildings within it

Summary

7.18 Corston is a settlement of early medieval origin with the boundary of the manor estate described in 12th century copies of a 10th century charter. In the Domesday Book the settlement is recorded as Corstune and belonged to Bath Abbey. The All Saints Church within the village is the oldest surviving building, dating to the c.12th century but altered in c.13th, c.15th and c.16th centuries before being fully restored in 1864-5. A large number of the other surviving historic buildings within the settlement are of c.17th century origin, with some also of c.18th-19th century date.

Table 7.2: Corston Conservation Area effects summary table

Importance	Type of change	Sensitivity	Risk of harm	Level of effect
High	Setting change	High	High	High
High	Setting change	High	High	Less than substantial Harm

Significance

7.19 The significance of Conservation Area is drawn from the following values:

- **Evidential value**: Corston CA is believed to owe its origins to the Saxon period and derives its evidential value from its potential to retain evidence of its historic settlement and land use.
- **Historical value**: The asset has historical (illustrative) value as a long surviving example of a nucleated historic village reflective of gradual organic development over time. The extent and built form of Corston have remained largely unaltered since the late C19.
- **Aesthetic value**: The aesthetic value of the Corston Conservation Area is derived from its well-preserved historic settlement pattern, traditional buildings, historic boundary features, and its strong visual and physical relationship with the surrounding rural landscape.

7.20 The listed buildings within Corston comprise the Church of All Saints, domestic buildings, a war memorial and a milestone. The significance of these assets is derived from their historic, aesthetic and communal values related to the historic development of the village. The significance of these assets is also derived from their setting within the village of Corston.

7.21 The importance of these assets is **High.**

Contribution of setting

7.22 The rural landscape setting of the Corston Conservation Area makes an important contribution to its significance. The topography and agricultural land use of the surrounding landscape help shape key views into, out of, and across the historic village. There are four public rights of way which provide opportunities to experience the views, allowing an appreciation of the historic village within its agricultural landscape. Collectively, these views strengthen the physical, visual, and historic relationship between the conservation area and its surrounding landscape.

Contribution of the Site to asset's significance

7.23 The Site contains one of the public rights of way running through it which has been maintained since the late 19th century. Its location adjacent to the conservation area means it forms part of the rural agricultural setting which contributes to the significance of the conservation area.

7.24 The parts of the setting of the Listed Buildings within Corston from which their significance is derived relates to their location within the historic village. The Site makes no contribution to the significance of these assets.

Sensitivity to development of the Site

7.25 The sensitivity of Corston Conservation Area to the development of the Site is **High**. Development of the Site will change its rural character and change its agricultural setting. Development within the Site would be clearly intervisible with the conservation area and the addition of a 'hard' edge of development would disrupt and obscure views into and out of the conservation area from the north-west.

7.26 The sensitivity of the listed buildings within Corston to the development of the Site is **Low**. Development within the Site will not affect the ability to understand and appreciate the significance of the assets within the village, as this is derived from their location and relationship to the form, layout and character of Corston.

Potential for harm to the asset

7.27 Development of the Site has the potential to harm the significance of the Corston Conservation Area, but is unlikely to harm the significance of the Listed Buildings within it.

Level of effect

7.28 The development of the Site would have a **high** level of effect on the Corston Conservation Area, which would equate to **less than substantial harm** to the asset.

7.29 The development of the Site would have no effect on the listed buildings within Corston.

Setting effects to WHS

7.30 One of the criteria for the OUV for the WHS is the way in which the city was deliberately built within a green valley, built to a Picturesque landscape aestheticism creating a strong garden city feel. The green, undeveloped farmland setting of the WHS is a key part of its significance as the relationship of buildings within the WHS and the surrounding open space form a key part of its significance. The views to and from the WHS also form a key role.

7.31 The Site is in a sensitive location due to its proximity to the City of Bath WHS and being within the area identified as part of its setting. The Site is located within one of 'important green hillsides' (an attribute of OUV) as identified in the City of Bath WHS Setting SPD, 2013. These areas contribute to the character of, and views from, the city and also forms part of the pastoral green landscape that surrounds the WHS.

7.32 Residential development within the Site would affect the significance of the setting of the WHS via the introduction of development into the green, undeveloped hillside to the north-west of Corston, affecting its OUV. This would result in a **high** risk of harm and the ICOMOS review suggests that development in this area is likely to cause substantial harm and would not be able to be satisfactorily mitigated.

References

1 CIfA, IEMA and IHBC 2021, *Principles of Cultural Heritage Impact Assessment in the UK*. Available at: https://www.archaeologists.net/sites/default/files/2024-11/CIfA-IEMA-Principles-Cultural-Heritage-Impact-UK_2021.pdf

2 Historic England 2015, *Historic England Advice Note 3 (HEAN3) The Historic Environment and Site Allocations in Local Plans*. Available at: https://historicengland.org.uk/images-books/publications/historic-environment-and-Site-allocations-in-local-plans/

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5 Historic England 2008, *Conservation Principles, Policies and Guidance.* Available at: https://historicengland.org.uk/advice/constructive-conservation/conservation-principles/

6 Historic England 2008, Conservation Principles, Policies and Guidance, paras 78-79. Available at: https://historicengland.org.uk/advice/constructive-conservation/conservation-principles/

7 All listed buildings, regardless of grade, benefit from the same statutory protection for their fabric and setting conferred by Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended. All are treated as assets of 'high' importance as a matter of course, unless otherwise stated.

8 City of Bath & Great Spa Towns of Europe | World Heritage Site Management Plan 2024-2030 Pg 22

9 City of Bath & Great Spa Towns of Europe | World Heritage Site Management Plan 2024-2030 Pg 25

10 City of Bath & Great Spa Towns of Europe Management Plan Pg 23

11 City of Bath & Great Spa Towns of Europe Management Plan Pg 23

12 City of Bath & Great Spa Towns of Europe | World Heritage Site Management Plan 2024-2030, pg. 25

13 NPPF Glossary 2012

14 Historic England 2017, The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) paragraph 9

15 City of Bath & Great Spa Towns of Europe | World Heritage Site Management Plan 2024-2030 Pg 17

16 Planning Practice Guidance (PPG) 2019, Paragraph: 013 Reference ID: 18a-013-20190723

17 ICOMOS Technical Review of Bath and North East Somerset Local Plan Options Document 2025. Received December 2025.

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