



**Proposed Redevelopment of
Dick Lovett Site
Lower Bristol Road, Bath**

**Environmental Statement
Technical Annex C:
Built Heritage**

August 2020

DICK LOVETT MINI GARAGE,
LOWER BRISTOL ROAD, BATH
BA2 3DR

TECHNICAL ANNEX C BUILT HERITAGE BASELINE

PREPARED BY PEGASUS GROUP
ON BEHALF OF THE WATKINS JONES GROUP

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Pegasus Group

First Floor | South Wing | Equinox North | Great Park Road | Almondsbury | Bristol | BS32 4QL

T 01454 625945 W www.pegasusgroup.co.uk

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | Dublin | East Midlands | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough

DESIGN | **ENVIRONMENT** | **PLANNING** | **ECONOMICS** | **HERITAGE**

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ES TECHNICAL ANNEX C BUILT HERITAGE TECHNICAL BASELINE

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ON BEHALF OF: THE WATKINS JONES GROUP

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1. Introduction

- 1.1 Pegasus Group have been commissioned by The Watkins Jones Group to prepare a Built Heritage Technical Annex in relation to the proposed redevelopment of the existing Dick Lovett BMW and Mini dealership sites located on Lower Bristol Road, Bath, as shown on the Site Location Plan provided at [Error! Reference source not found.](#).



Plate 1: Site Location Plan.

- 1.2 The results of this Technical Annex will be used to inform the assessments of impact provided within the Environmental

Statement (ES) Main Report Chapter 7.

- 1.3 The Site occupies c. 1.43ha of former industrial land (now in commercial use) to the north of Lower Bristol Road, and is currently occupied by the Dick Lovett BMW and Mini showrooms, associated garages and outbuildings, hard standing for vehicle parking, and various boundary walls.
- 1.4 The Site is located within the Bath World Heritage Site; however, it lies outside the boundary of the Bath Conservation Area. There are no Listed Buildings within the Site or immediately adjacent to it.
- 1.5 This Built Heritage Technical Baseline provides information with regards to the significance of the built historic environment to fulfil the requirement given in paragraph 189 of the

Government's National Planning Policy Framework (the NPPF¹)

which requires:

*"an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting."*²

- 1.6 As required by paragraph 189 of the NPPF, the detail and assessment in this Report is considered to be "*proportionate to the asset's importance*"³
- 1.7 Matters pertaining to below ground archaeology are assessed within the Archaeological Desk-Based Assessment (prepared by Pegasus Group) submitted as part of the wider application package.

¹ Ministry of Housing, Communities and Local Government (MHCLG), *National Planning Policy Framework (NPPF)* (London, February 2019).

² MHCLG, *NPPF*, paragraph 189.

³ MHCLG, *NPPF*, paragraph 189.

2. Site Description and Planning History

- 2.1 The Site occupies c. 1.43ha of former industrial land to the north of Lower Bristol Road (Plate 2). The River Avon flows to the north of the Site, c. 220m at its nearest point, and is separated from the Site by a large area of intervening, former industrial, brownfield land.
- 2.2 At present, the eastern half of the Site is occupied by the Dick Lovett Mini showroom and associated buildings, all of which date

from the late 20th-century. The western half of the Site is occupied by the BMW showroom and additional garages and outbuildings, also of late 20th-century origin. These buildings are surrounded by hard standing for vehicle parking. There is minimal vegetation across the Site as shown on the aerial photo provided at Plate 2.

- 2.3 There are no built heritage assets within the Site.



Plate 2: Satellite image of the site (shaded in red).

Source: Google Earth Pro.

Site Development

- 2.4 A review of 18th- to 20th-century cartographic sources demonstrates the transition of the Site and its surrounds from agricultural hinterland to a highly industrialised area as part of the 19th- and 20th-century growth of the City of Bath. The area is continuing to evolve, with a number of the former 19th and 20th-century industrial sites now being redeveloped for new uses.
- 2.5 The 1742 Map of the City of the Bath (Plate 3) illustrates that during the mid-18th century, the Site lay within an area of agricultural field systems to the east of Twiverton (modern-day Twerton) and beyond the historic urban core of Bath to the east.



Plate 3: 1742 Map of the City of Bath (approximate location of site outlined in red).

Source: Know Your Place Bath.

- 2.6 The 1838 Tithe Map for the Parish of Twerton (Plate 4) shows that the Site lies across four former parcels of pasture (nos. 145 to 148) and the southern part of the 'Hop Mead Buildings' (no. 149). Parcel no. 145 ('Part of Long Meadow or Moor Ground') was owned by Henry Mitchell and tenanted to Joseph Knowles. 'Long Mead' pasture (nos. 146 and 147) was then owned by Robert Cooke Senior and William Gore Langton and occupied by Thomas Lewis and Richard Cooper. Meanwhile, 'Hop Mead' pasture (no. 148) and the 'Hop Mead Buildings' were owned by James Grant Smith and are recorded as being disused ('void') at this time.



Plate 4: 1838 Tithe Map for the Parish of Twerton (site shaded red).

Source: Know Your Place Bath.

2.7 The First Edition Ordnance Survey Map (Plate 5) shows that although much of the Site remained as open land, the Bath Junction of the Midland Railway (which opened in 1869) had been laid across the northern boundary and through the centre of the Site. By this time, the former Hop Mead Buildings within the eastern part of the Site had been replaced by a row of terraced houses, which were presumably occupied by local industrial workers and their families. Further rows of terraced houses are shown to the south and west of the Site. An orchard (or 'market garden' as it is described on the 1838 Tithe Map) and malthouse are shown to the south-east of the Site, while industrial structures are marked to the north, including a gasometer and chemical works.

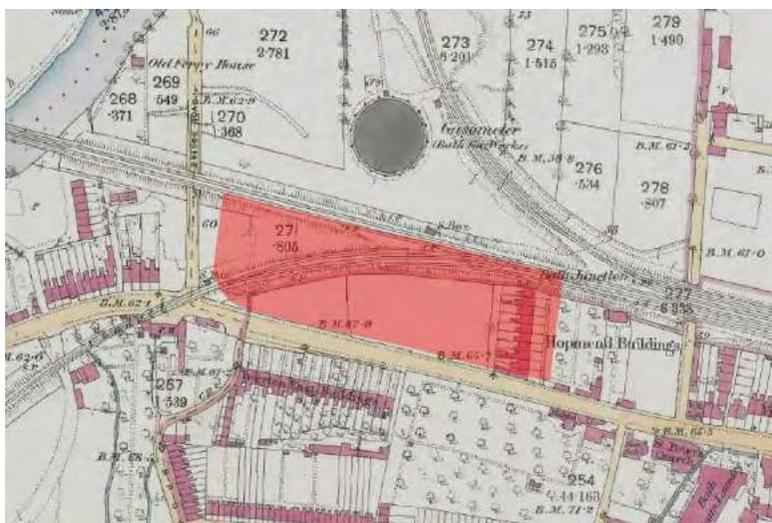


Plate 5: First Edition (1888) Ordnance Survey (site shaded red).

Source: Know Your Place Bath.

2.8 On the Second Edition Ordnance Survey Map (Plate 6) the central part of the Site is clearly marked as allotment gardens. A urinal is marked at the south-west boundary and earthworks are shown within the western part of the Site. There had been further built development in the immediate vicinity of the Site, the most notable addition being the large Printing Works erected on the western part of the former market garden to the south.

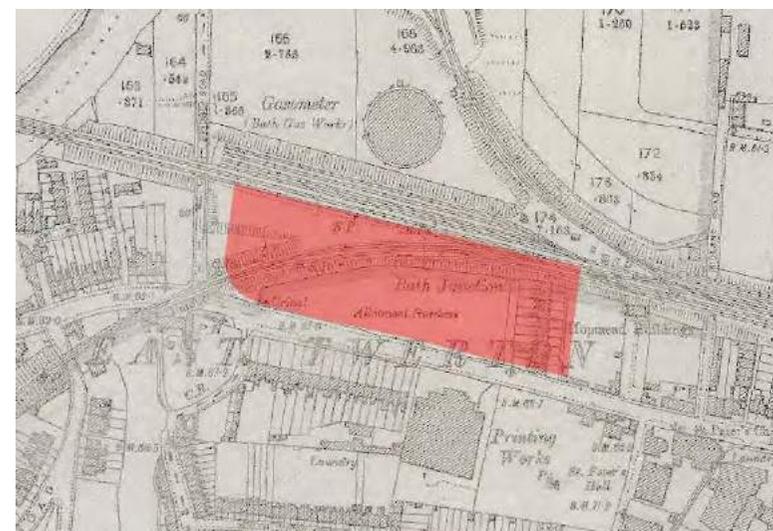


Plate 6: 1904 Ordnance Survey (site shaded red).

Source: Know Your Place Bath.

2.9 An aerial photograph taken in 1932 (Plate 7) shows that a new complex of buildings had been erected in the eastern part of the Site, adjacent to the terraced houses. More generally, the photograph illustrates the increasing industrialisation of the area, the most notable change being the enlargement of the printing works to the south of the Site.



Plate 7: 1932 aerial photograph of the Phonetic Institute Print Works (Pitman Press), taken from the north, with the eastern half of the Site visible (shaded red).

Source: Britain From Above,
<https://britainfromabove.org.uk/en/image/EPW038336>

2.10 By the time the 1952 Ordnance Survey was produced (Plate 8), the central part of the Site had been fully developed with the construction of buildings and tanks associated with a petroleum installation. The row of terraced houses beyond the Site to the south had been demolished and replaced with an engineering works; the Printing Works to the south had been further extended; and a warehouse had been erected to the east.

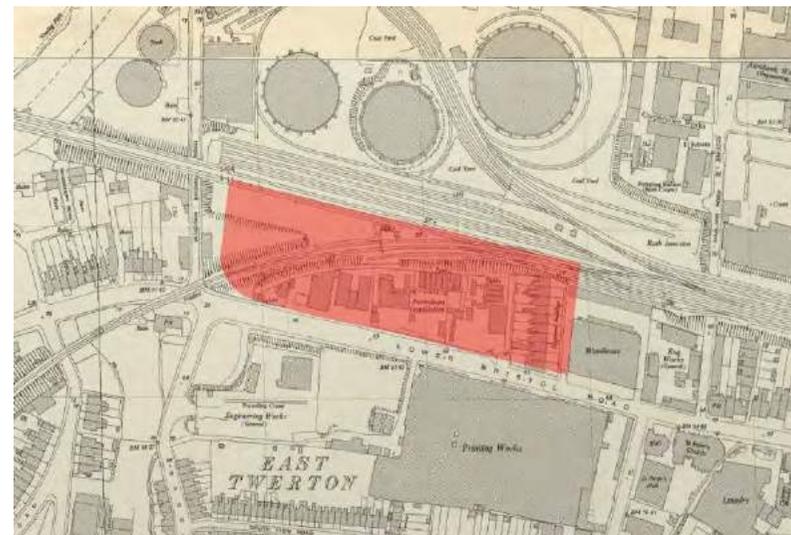


Plate 8: 1952 Ordnance Survey (Site shaded red).

Source: Know Your Place Bath.

2.11 Since the 1952 Ordnance Survey was drawn, the Hopmead Buildings and petroleum installation have been demolished and the Site redeveloped; it is now occupied by the showrooms, garage buildings and hard standing described in the Site Description above. The Bath Junction, which ran through the northern and central parts of the Site, was dismantled following the Beeching Reports of 1963 and 1965.

2.12 Satellite imagery from 1999 to 2018 illustrates no appreciable change to the composition of the Site over the course of this period.

2.13 The surrounds of the Site have however undergone extensive change within recent years, in particular with regard to the redevelopment of the wider 'Bath Western Riverside area' to the north and north-east (as covered by LPA Refs: 06/01733/EOUT and 06/04013/EFUL). Although the redevelopment of the Bath Western Riverside area as a whole, is in various stages of completion, areas to the northeast of the Site are currently at the stage where they are now occupied. These areas include built form of up to seven and eight storeys in height.

2.14 Outside of the Bath Western Riverside area, transition and redevelopment of the built urban environment is also evident. The recently completed Roseberry Place complex to the west of the Site has resulted in the introduction of new, modern built form at the junction of Lower Bristol Road and Windsor Bridge Road, elements of which are up to six storeys in height. (LPA Ref: 15/01932/EOUT and 16/03114/ERES).

2.15 To the south of the Site, the former Bath Press complex is also undergoing redevelopment (LPA Ref: 15/02162/EFUL). The former Printing Works and other industrial buildings have been demolished, with the exception of the Lower Bristol Road façade, **and site is being 'prepared'** for construction works. Once completed, the complex will incorporate built form between two and five storeys in height.



*Plate 9: 2020 satellite image of the Site (shaded red) and its surrounds.
Source: Bing.*



Plate 10: View of the eastern part of the Site.



Plate 12: View west along Lower Bristol Rd including the Site, the Bath Press complex and Roseberry Place.



Plate 11: View of the western part of the Site.



Plate 13: View west along Lower Bristol Rd from adjacent to the southwest corner of the Site.



Plate 14: Roseberry Place as seen from adjacent to the southwest corner of the Site.



Plate 16: New development within the Bath Western Riverside area to the northeast of the Site.



Plate 15: Roseberry Place as seen from Windsor Bridge Road.



Plate 17: New development within the Bath Western Riverside area to the northeast of the Site.

2.16 The recent and ongoing redevelopment of the surrounds of the Site (see [Plate 18](#)) is an important consideration when assessing the existing baseline, and potential impacts that may arise from the development proposals.

Planning History

2.17 A review of the recent planning history records held online by Bath and North East Somerset Council (B&NES) has identified the following relevant planning history for the Site.

2.18 In December 2010, Outline Planning Permission (LPA Ref: 06/01733/EOUT) was granted from the redevelopment of the Bath Western Riverside area as a whole, including the eastern part Site. The description of development reads as follows:

"Western Riverside Development Area, Midland Road, Twerton, Bath: A new residential quarter including up to 2281 residential homes and apartments (Class C3); up to 675 student bedrooms and associated communal areas (Class C3) (or alternatively up to 345 student bedrooms (Class C3) and a primary school (Class D1)); local shops, restaurants, and other community services and facilities (within Classes A1, A2, A3, A4, A5, D1); construction of new bridges, roads, footways and cycleways; associated infrastructure and facilities; accommodation works; and landscaping."

2.19 A non-material amendment was approved on 20th March 2017 to slightly vary some of the approved parameter plans, specifically in respect of the layout of block B10 by replacing the terrace of townhouses with an apartment building along Stothert Avenue (identified as B40).

2.20 The non-material amendment did not impact the outline proposals associated with the eastern part of the Site.

2.21 The approved Land Use Plan associated with these two applications showed that, following the demolition of the existing buildings, the eastern part of the Site would be occupied by two, five-storey buildings in use as either student housing or student housing with retail, GP surgery, shops, café etc. at ground floor level.

2.22 Assessments presented regarding potential impacts to the historic environment during the consideration of these applications will be discussed, where relevant, within this Technical Annex and the ES Main Report Chapter 7.

2.23 In December 2019, a Reserved Matters application was submitted with regard to the eastern part of the Site (LPA Ref: 19/05165/ERES). The description of development reads as follows:

"Approval of reserved matters (scale, appearance and landscaping) pursuant to outline application 06/01733/EOUT for the erection of 2 no. 5-storey buildings comprising 290 student bedrooms (Sui Generis); retail floorspace (Class A1); bin and cycle stores, plant rooms, and associated landscaping works."

2.24 The decision regarding this application is still pending.

Outside of the Site

2.25 In addition to the redevelopment discussed above, the following planning applications within the vicinity of the Site are

considered to be of relevance – see [Plate 18](#).

- 2.26** In March 2020 Planning Permission was approved for the redevelopment of the Chivers House site on Windsor Bridge Road, located to the northwest of the Site, north of Roseberry Place (LPA Ref: 18/03797/FUL). The redevelopment comprised the demolition of the existing buildings and construction of two residential buildings, with these being seven and six storeys in height.
- 2.27** **This development forms part of the 'future baseline' from which to assess the Site.**
- 2.28** In December 2019, a Reserved Matters application was submitted regarding the redevelopment of the former Waste Depot site, on the northern banks of the River Avon (LPA Ref: 19/05471/ERES), with this area located within the site boundary associated with the approved Bath Western Riverside Outline Planning Application.
- 2.29** Assessments presented regarding potential impacts to the historic environment during the consideration of these application will be discussed within this Technical Annex and the ES Main Report Chapter 7, where relevant.



01 - Chivers House - Planning



02 - Spring Wharf - Built



03 -BWRM Development - Built



04 - Bath Press - Planning



05 - Student Accommodation - Planning

Plate 18: Extract from the Design and Access Statement highlighting the location of recent and forthcoming redevelopment within the surrounds of the Site.

3. Methodology

3.1 The aims of this Built Heritage Technical Annex are to assess the contribution that the Site makes to the heritage significance of the surrounding designated built heritage assets. Any harm or benefit to them which may result from the implementation of the development proposals, along with the level of any harm caused, if relevant, is discussed within ES Main Report Chapter 7.

Site Visit

3.2 A site visits were undertaken by Heritage Consultants from Pegasus Group in November 2019 and July 2020, during which the Site and its surrounds were assessed. Selected heritage assets were assessed from publicly accessible areas.

3.3 The visibility on this day was clear. Surrounding vegetation was in full leaf at the time of the site visit, and thus the potential screening that this affords was also considered when assessing potentially intervisibility between the Application Site and surrounding areas.

Sources

3.4 The following key sources have been consulted as part of this assessment:

- *The National Heritage List for England for information on designated heritage assets;*
- *City of Bath World Heritage Site Setting: Supplementary Planning Document (August 2013);*
- *City of Bath World Heritage Site: Management Plan 2016–2022 (2016);*
- *Bath & North East Somerset Council, Bath City-wide Character Appraisal (2005); and*
- *Online sources, including aerial photographs and satellite imagery (where relevant).*
- *LIDAR data from the Environment Agency.*

Assessment of Significance

3.5 In the NPPF, heritage significance is defined as:

"The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of

Outstanding Universal Value forms part of its significance.”⁴

3.6 Historic England’s *Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning: 2⁵* (hereafter GPA 2) gives advice on the assessment of significance as part of the application process. It advises understanding the nature, extent, and level of significance of a heritage asset.

3.7 In order to do this, GPA 2 also advocates considering the four types of heritage value an asset may hold, as identified in **English Heritage’s Conservation Principles**.⁶ These essentially cover the heritage ‘interests’ given in the glossary of the NPPF⁷ and the online Planning Practice Guidance on the Historic Environment⁸ (hereafter ‘PPG’) which are *archaeological, architectural and artistic* and *historic*.

3.8 The PPG provides further information on the interests it identifies:

- *Archaeological interest: “As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past*

⁴ MHCLG, *NPPF*, p. 71.

⁵ Historic England, *Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning: 2* (2nd edition, Swindon, July 2015).

⁶ English Heritage, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* (London, April 2008). These heritage values are identified as being ‘aesthetic’, ‘communal’, ‘historical’ and ‘evidential’, see *idem* pp. 28–32.

human activity worthy of expert investigation at some point.”

- *Architectural and artistic interest: “These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture.”*
- *Historic interest: “An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation’s history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.”⁹*

3.9 Significance results from a combination of any, some or all of the interests described above.

3.10 The most-recently issued guidance on assessing heritage significance, **Historic England’s Statements of Heritage Significance: Analysing Significance in Heritage Assets**, *Historic*

⁷ MHCLG, *NPPF*, p. 71.

⁸ Ministry of Housing Communities and Local Government (MHCLG), *Planning Practice Guidance: Historic Environment (PPG)* (revised edition, 23rd July 2019), <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>.

⁹ MHCLG, *PPG*, paragraph 006, reference ID: 18a-006-20190723.

England Advice Note 12,¹⁰ advises using the terminology of the NPPF and PPG, and thus it is that terminology which is used in this Report.

- 3.11** Listed Buildings and Conservation Areas are generally designated for their special architectural and historic interest. Scheduling is predominantly, although not exclusively, associated with archaeological interest.

Setting and Significance

- 3.12** As defined in the NPPF:

"Significance derives not only from a heritage asset's physical presence, but also from its setting."¹¹

- 3.13** Setting is defined as:

"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."¹²

- 3.14** Therefore, setting can contribute to, affect an appreciation of significance, or be neutral with regards to heritage values.

¹⁰ Historic England, *Statements of Heritage Significance: Analysing Significance in Heritage Assets*, *Historic England Advice Note 12* (Swindon, October 2019).

¹¹ MHCLG, *NPPF*, p. 71.

¹² MHCLG, *NPPF*, p. 71.

Assessing Change Through Alteration to Setting

- 3.15** How setting might contribute to these values has been assessed within this Report with reference to *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3*¹³ (henceforth referred to as 'GPA 3'), particularly the checklist given on page 11. This advocates the clear articulation of "what matters and why".¹⁴

- 3.16** In GPA 3, a stepped approach is recommended, of which Step 1 is to identify which heritage assets and their settings are affected. Step 2 is to assess whether, how and to what degree settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated. The guidance includes a (non-exhaustive) checklist of elements of the physical surroundings of an asset that might be considered when undertaking the assessment including, among other things: topography, other heritage assets, green space, functional relationships and degree of change over time. It also lists aspects associated with the experience of the asset which might be considered, including: views, intentional intervisibility, tranquillity, sense of enclosure, accessibility, rarity and land use.

- 3.17** Step 3 is to assess the effect of the proposed development on the significance of the asset(s). Step 4 is to explore ways to

¹³ Historic England, *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd edition, Swindon, December 2017).

¹⁴ Historic England, *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3* (2nd edition, Swindon, December 2017), p. 8.

maximise enhancement and minimise harm. Step 5 is to make and document the decision and monitor outcomes.

- 3.18 A Court of Appeal judgement has confirmed that whilst issues of visibility are important when assessing setting, visibility does not necessarily confer a contribution to significance and also that factors other than visibility should also be considered, with Lindblom LJ stating at paragraphs 25 and 26 of the judgement (referring to an earlier Court of Appeal judgement)¹⁵:

Paragraph 25 – “But – again in the particular context of visual effects – I said that if “a proposed development is to affect the setting of a listed building there must be a distinct visual relationship of some kind between the two – a visual relationship which is more than remote or ephemeral, and which in some way bears on one’s experience of the listed building in its surrounding landscape or townscape” (paragraph 56)”.

Paragraph 26 – “This does not mean, however, that factors other than the visual and physical must be ignored when a decision-maker is considering the extent of a listed building’s setting. Generally, of course, the decision-maker will be concentrating on visual and physical considerations, as in Williams (see also, for example, the first instance judgment in R. (on the application of Miller) v North Yorkshire County Council [2009] EWHC 2172 (Admin), at paragraph 89). But it is clear from the relevant national policy and guidance to which I have referred, in particular the guidance in paragraph 18a-013-20140306 of the PPG, that the Government recognizes the potential relevance of other considerations – economic, social and historical.

¹⁵ *Catesby Estates Ltd. v. Steer* [2018] EWCA Civ 1697, para. 25 and 26.

These other considerations may include, for example, “the historic relationship between places”. Historic England’s advice in GPA3 was broadly to the same effect.”

Levels of Significance

- 3.19 Descriptions of significance will naturally anticipate the ways in which impacts will be considered. Hence descriptions of the significance of Conservation Areas will make reference to their special interest and character and appearance, and the significance of Listed Buildings will be discussed with reference to the building, its setting and any features of special architectural or historic interest which it possesses.
- 3.20 In accordance with the levels of significance articulated in the NPPF and the PPG, three levels of significance are identified:
- *Designated heritage assets of the highest significance, as identified in paragraph 194 of the NPPF, comprising Grade I and II* Listed buildings, Grade I and II* Registered Parks and Gardens, Scheduled Monuments, Protected Wreck Sites, World Heritage Sites and Registered Battlefields (and also including some Conservation Areas) and non-designated heritage assets of archaeological interest which are demonstrably of equivalent significance to Scheduled Monuments, as identified in footnote 63 of the NPPF;*
 - *Designated heritage assets of less than the highest significance, as identified in paragraph 194 of the NPPF, comprising Grade II Listed buildings and Grade II Registered Parks and Gardens (and also*

some Conservation Areas); and

- *Non-designated heritage assets.* Non-designated heritage assets are defined within the PPG as **"buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets"**.¹⁶

3.21 Additionally, it is of course possible that sites, buildings or areas have *no heritage significance*.

Assessment of Harm

3.22 Assessment of any harm will be articulated in terms of the policy and law that the proposed development will be assessed against, such as whether a proposed development preserves or enhances the character or appearance of a Conservation Area, and articulating the scale of any harm in order to inform a balanced judgement/weighting exercise as required by the NPPF.

3.23 In order to relate to key policy, the following levels of harm may potentially be identified for designated heritage assets:

- *Substantial harm or total loss.* It has been clarified in a High Court Judgement of 2013 that this **would be harm that would "have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced"**.¹⁷ and

- *Less than substantial harm.* Harm of a lesser level than that defined above.

3.24 With regards to these two categories, the PPG states:

"Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated."¹⁸

3.25 Hence, for example, harm that is less than substantial would be further described with reference to where it lies on that spectrum or scale of harm, for example low end, middle of the spectrum and upper end of the less than substantial harm scale.

3.26 With regards to non-designated heritage assets, there is no basis in policy for describing harm to them as substantial or less than substantial, rather the NPPF requires that the scale of any harm or loss is articulated. As such, harm to such assets is articulated as a level of harm to their overall significance, with levels such as negligible, minor, moderate and major harm identified.

3.27 It is also possible that development proposals will cause *no harm or preserve* the significance of heritage assets. A High Court Judgement of 2014 is relevant to this. This concluded that with regard to preserving the setting of a Listed building or preserving the character and appearance of a Conservation

¹⁶ MHCLG, PPG, paragraph 039, reference ID: 18a-039-20190723.

¹⁷ *Bedford Borough Council v Secretary of State for Communities and Local Government* [2013] EWHC 2847 (Admin), para. 25.

¹⁸ MHCLG, PPG, paragraph 018, reference ID: 18a-018-20190723.

Area, 'preserving' means doing 'no harm'.¹⁹

3.28 Preservation does not mean no change; it specifically means no harm. GPA 2 states that "*Change to heritage assets is inevitable but it is only harmful when significance is damaged*".²⁰ Thus, change is accepted in Historic England's guidance as part of the evolution of the landscape and environment. It is whether such change is neutral, harmful or beneficial to the significance of an asset that matters.

3.29 As part of this, setting may be a key consideration. For an evaluation of any harm to significance through changes to setting, this assessment follows the methodology given in GPA 3, described above. Again, fundamental to the methodology set out in this document is stating "what matters and why". Of particular relevance is the checklist given on page 13 of GPA 3.

3.30 It should be noted that this key document also states that:

*"Setting is not itself a heritage asset, nor a heritage designation..."*²¹

3.31 Hence any impacts are described in terms of how they affect the significance of a heritage asset, and heritage values that contribute to this significance, through changes to setting.

3.32 With regards to changes in setting, GPA 3 states that:

*"Conserving or enhancing heritage assets by taking their settings into account need not prevent change".*²²

3.33 Additionally, it is also important to note that, as clarified in the Court of Appeal, whilst the statutory duty requires that special regard should be paid to the desirability of not harming the setting of a Listed Building, that cannot mean that any harm, however minor, would necessarily require Planning Permission to be refused.²³

Benefits

3.34 Proposed development may also result in benefits to heritage assets, and these are articulated in terms of how they enhance the heritage values and hence the significance of the assets concerned.

¹⁹ *R (Forge Field Society) v Sevenoaks District Council* [2014] EWHC 1895 (Admin).

²⁰ Historic England, *GPA 2*, p. 9.

²¹ Historic England, *GPA 3*, p. 4.

²² Historic England, *GPA 3.*, p. 8.

²³ *Palmer v Herefordshire Council & Anor* [2016] EWCA Civ 1061.

4. Planning Policy Framework

4.1 This section of the Report sets out the legislation and planning policy considerations and guidance contained within both national and local planning guidance which specifically relate to the Site, with a focus on those policies relating to the protection of the historic environment.

Legislation

4.2 Legislation relating to the built historic environment is primarily set out within the *Planning (Listed Buildings and Conservation Areas) Act 1990*,²⁴ which provides statutory protection for Listed Buildings and Conservation Areas.

4.3 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that:

*"In considering whether to grant planning permission [or permission in principle] for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."*²⁵

²⁴ UK Public General Acts, *Planning (Listed Buildings and Conservation Areas) Act 1990*.

²⁵ *Planning (Listed Buildings and Conservation Areas) Act 1990*, Section 66(1).

4.4 In the 2014 Court of Appeal judgement in relation to the Barnwell Manor case, Sullivan LJ held that:

*"Parliament in enacting section 66(1) did intend that the desirability of preserving the settings of listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given "considerable importance and weight" when the decision-maker carries out the balancing exercise."*²⁶

4.5 A judgement in the Court of Appeal ('Mordue') has clarified that, with regards to the setting of Listed Buildings, where the principles of the NPPF are applied (in particular paragraph 134 of the 2012 draft of the NPPF, the requirements of which are now given in paragraph 196 of the revised NPPF, see below), this is in keeping with the requirements of the 1990 Act.²⁷

4.6 With regards to development within Conservation Areas, Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states:

"In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability

²⁶ *Barnwell Manor Wind Energy Ltd v (1) East Northamptonshire DC & Others* [2014] EWCA Civ 137. para. 24.

²⁷ *Jones v Mordue* [2015] EWCA Civ 1243.

of preserving or enhancing the character or appearance of that area.”

- 4.7 Unlike Section 66(1), Section 72(1) of the Act does not make reference to the setting of a Conservation Area. This makes it plain that it is the character and appearance of the designated Conservation Area that is the focus of special attention.
- 4.8 Scheduled Monuments are protected by the provisions of the *Ancient Monuments and Archaeological Areas Act 1979* which relates to nationally important archaeological sites.²⁸ Whilst works to Scheduled Monuments are subject to a high level of protection, it is important to note that there is no duty within the 1979 Act to have regard to the desirability of preservation of the setting of a Scheduled Monument.
- 4.9 In addition to the statutory obligations set out within the Planning (Listed Buildings and Conservations Area) Act 1990, Section 38(6) of the *Planning and Compulsory Purchase Act 2004* requires that all planning applications, including those for Listed Building Consent, are determined in accordance with the Development Plan unless material considerations indicate otherwise.²⁹

²⁸ UK Public General Acts, *Ancient Monuments and Archaeological Areas Act 1979*.

National Planning Policy Guidance

[The National Planning Policy Framework \(February 2019\)](#)

- 4.10 **National policy and guidance is set out in the Government’s National Planning Policy Framework (NPPF)** published in February 2019. This replaced and updated the previous NPPF 2018 which in turn had amended and superseded the 2012 version. The NPPF needs to be read as a whole and is intended to promote the concept of delivering sustainable development.
- 4.11 **The NPPF sets out the Government’s economic, environmental and social planning policies for England.** Taken together, these **policies articulate the Government’s vision of sustainable development**, which should be interpreted and applied locally to meet local aspirations. The NPPF continues to recognise that the planning system is plan-led and that therefore Local Plans, incorporating Neighbourhood Plans, where relevant, are the starting point for the determination of any planning application, including those which relate to the historic environment.
- 4.12 The overarching policy change applicable to the proposed development is the presumption in favour of sustainable development. This presumption in favour of sustainable **development (the ‘presumption’) sets out the tone of the Government’s overall stance** and operates with and through the other policies of the NPPF. Its purpose is to send a strong signal

²⁹ UK Public General Acts, *Planning and Compulsory Purchase Act 2004*, Section 38(6).

to all those involved in the planning process about the need to plan positively for appropriate new development; so that both plan-making and development management are proactive and driven by a search for opportunities to deliver sustainable development, rather than barriers. Conserving historic assets in a manner appropriate to their significance forms part of this drive towards sustainable development.

- 4.13** The purpose of the planning system is to contribute to the achievement of sustainable development and the NPPF sets out **three 'objectives' to facilitate sustainable development:** an economic objective, a social objective, and an environmental objective. The presumption is key to delivering these objectives, by creating a positive pro-development framework which is underpinned by the wider economic, environmental and social provisions of the NPPF. The presumption is set out in full at paragraph 11 of the NPPF and reads as follows:

"Plans and decisions should apply a presumption in favour of sustainable development.

For plan-making this means that:

- a. plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;*
- b. strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

For decision-taking this means:

- a. approving development proposals that accord with an up-to-date development plan without delay; or*
- b. where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
 - i. the application policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when*

assessed against the policies in this Framework taken as a whole."³⁰

4.14 However, it is important to note that footnote 6 of the NPPF applies in relation to the final bullet of paragraph 11. This provides a context for paragraph 11 and reads as follows:

*"The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 176) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 63); and areas at risk of flooding or coastal change."*³¹ (our emphasis)

4.15 The NPPF continues to recognise that the planning system is plan-led and that therefore, Local Plans, incorporating Neighbourhood Plans, where relevant, are the starting point for the determination of any planning application.

4.16 Heritage Assets are defined in the NPPF as:

"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. It includes designated heritage

³⁰ MHCLG, *NPPF*, para. 11.

³¹ MHCLG, *NPPF*, para. 11, fn. 6.

³² MHCLG, *NPPF*, p. 67.

assets and assets identified by the local planning authority (including local listing)."³²

4.17 The NPPF goes on to define a Designated Heritage Asset as a:

*"World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under relevant legislation."*³³ (our emphasis)

4.18 As set out above, significance is also defined as:

*"The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance."*³⁴

4.19 Section 16 of the NPPF relates to 'Conserving and enhancing the historic environment' and states at paragraph 190 that:

"Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict

³³ MHCLG, *NPPF*, p. 66.

³⁴ MHCLG, *NPPF*, p. 71.

between the heritage asset's conservation and any aspect of the proposal."³⁵

4.20 Paragraph 192 goes on to state that:

"In determining planning applications, local planning authorities should take account of:

- a. the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b. the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c. the desirability of new development making a positive contribution to local character and distinctiveness.*"³⁶

4.21 With regard to the impact of proposals on the significance of a heritage asset, paragraphs 193 and 194 are relevant and read as follows:

"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."³⁷

³⁵ MHCLG, *NPPF*, para. 190.

³⁶ MHCLG, *NPPF*, para. 192.

"Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a. grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*
- b. assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.*"³⁸

4.22 Section b) of paragraph 194, which describes assets of the highest significance, also includes footnote 63 of the *NPPF*, which states that non-designated heritage assets of archaeological interest which are demonstrably of equivalent significance to Scheduled Monuments should be considered subject to the policies for designated heritage assets.

4.23 In the context of the above, it should be noted that paragraph 195 reads as follows:

"Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to

³⁷ MHCLG, *NPPF*, para. 193.

³⁸ MHCLG, *NPPF*, para. 194.

achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a. the nature of the heritage asset prevents all reasonable uses of the site; and
- b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- c. conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
- d. the harm or loss is outweighed by the benefit of bringing the site back into use.³⁹

4.24 Paragraph 196 goes on to state:

"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."⁴⁰

4.25 The NPPF also provides specific guidance in relation to development within Conservation Areas and World Heritage Sites, stating at paragraph 200 that:

"Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or

³⁹ MHCLG, *NPPF*, para. 195.

⁴⁰ MHCLG, *NPPF*, para. 196.

⁴¹ MHCLG, *NPPF*, para. 200.

*better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably."*⁴¹

4.26 Paragraph 201 goes on to recognise that "not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance"⁴² and with regard to the potential harm from a proposed development states:

"Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole."⁴³ (our emphasis)

4.27 With regards to non-designated heritage assets, paragraph 197 of NPPF states that:

"The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any

⁴² MHCLG, *NPPF*, para. 201.

⁴³ Ibid.

*harm or loss and the significance of the heritage asset.*⁴⁴

- 4.28 Footnote 63 of the NPPF clarifies that non-designated assets of archaeological interest which are demonstrably of equivalent significance to a Scheduled Monument will be subject to the policies for designated heritage assets.
- 4.29 Overall, the NPPF confirms that the primary objective of development management is to foster the delivery of sustainable development, not to hinder or prevent it. Local Planning Authorities should approach development management decisions positively, looking for solutions rather than problems so that applications can be approved wherever it is practical to do so. Additionally, securing the optimum viable use of sites and achieving public benefits are also key material considerations for application proposals.

National Planning Practice Guidance

- 4.30 The then Department for Communities and Local Government (now the Ministry for Housing, Communities and Local Government (MHCLG)) launched the planning practice guidance web-based resource in March 2014, accompanied by a ministerial statement which confirmed that a number of previous planning practice guidance documents were cancelled.
- 4.31 This also introduced the national Planning Practice Guidance (PPG) which comprised a full and consolidated review of

⁴⁴ MHCLG, *NPPF*, para. 197.

planning practice guidance documents to be read alongside the NPPF.

- 4.32 The PPG has a discrete section on the subject of the Historic Environment, which confirms that the consideration of 'significance' in decision taking is important and states:

*"Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals."*⁴⁵

- 4.33 In terms of assessment of substantial harm, the PPG confirms that whether a proposal causes substantial harm will be a judgement for the individual decision taker having regard to the individual circumstances and the policy set out within the NPPF. It goes on to state:

"In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.

⁴⁵ MHCLG, *PPG*, paragraph 007, reference ID: 18a-007-20190723.

*While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later inappropriate additions to historic buildings which harm their significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause **substantial harm.**"⁴⁶ (our emphasis)*

Local Planning Policy

- 4.34 Planning applications within Bath are currently considered against the policy and guidance set out within the Bath & North East Somerset Adopted Core Strategy (July 2014) and the Bath & North East Somerset Placemaking Plan (July 2017).

Bath & North East Somerset Adopted Core Strategy (2014)

- 4.35 Policy B1 of the adopted Core Strategy **provides the overall 'Bath Spatial Strategy'**, and with regard to historic environment as a whole states:

"The strategy for Bath is to:

1. Natural and Built Environment

Sustain and enhance the significance of the city's heritage assets, including:

a: The Outstanding Universal Value of the City of Bath World Heritage Site and its setting.

b: Listed buildings, the Bath conservation area and their settings.

c: Archaeology, scheduled ancient monuments, and historic parks and gardens.

d: Non-designated heritage assets of local interest and value.

e: Giving great weight to conserving landscape and scenic beauty in the Cotswolds Area of Outstanding Natural Beauty

f: The network of green spaces and wildlife corridors including the River Avon and Bath and North East Somerset Composite Core Strategy - Adopted 10th July 2014 30 Kennet and Avon Canal, Local Nature Reserves, formal and informal parks and recreational areas, trees and woodlands.

g: The biodiversity resource including species and habitats of European importance...

- 4.36 Policy B4 relates to the Bath World Heritage Site and its setting, reading as follows:

"There is a strong presumption against development that would result in harm to the Outstanding Universal Value of the World Heritage Site, its authenticity or integrity. This presumption applies equally to development within the setting of the World Heritage Site. Where development has a demonstrable public benefit, including mitigating and adapting to climate change, this benefit will be weighed against the level of harm to the Outstanding Universal Value of the World Heritage Site."

⁴⁶ MHCLG, PPG, paragraph 018, reference ID: 18a-018-20190723.

4.37 Further policy relating to the Historic Environment is included within Point 2 of Policy CP6 'Environmental Quality', which states:

"...2. Historic Environment

The sensitive management of Bath & North East Somerset's outstanding cultural and historic environment is a key component in the delivery of sustainable development. The Council will protect, conserve and seek opportunities to enhance the historic environment including the character and setting of designated and other heritage assets. The sensitive reuse and adaptation of historic buildings and spaces will be supported, and in areas where regeneration is required the imaginative integration of new development with the historic environment will be promoted. Where development has a demonstrable public benefit, including mitigating and adapting to climate change, this benefit will be weighed against any harm to the significance of the heritage asset. The Council will continue to develop strategies and guidance which ensure the historic environment and its significance is understood, recorded, promoted and enjoyed, and is sensitively and proactively managed, including those heritage assets most under threat. A positive and proactive conservation strategy will be promoted through the Placemaking Plan..."

Bath & North East Somerset Placemaking Plan (July 2017)

4.38 The Placemaking Plan was adopted in July 2017. It is intended to replace the majority of the 'saved' policies of the 2007 Local Plan and to sit alongside the Core Strategy.

4.39 Policy HE1 'Safeguarding Heritage Assets' sets out policy relating to the Historic Environment, stating:

1. *"Within the scope of Core Strategy Policies B4 and CP6, development that has an impact upon a heritage asset, whether designated or non-designated, will be expected to enhance or better reveal its significance and/or setting, and make a positive contribution to its character and appearance.*
2. *The District's historic environment shall be sustained and enhanced. This includes all heritage assets including the Bath World Heritage Site, historic buildings, conservation areas, historic parks and gardens, landscape, archaeology and townscapes of importance.*
3. *Applications affecting the significance of any heritage asset will be required to provide sufficient information to demonstrate how the proposals would contribute to the asset's conservation. Applications affecting the significance of any heritage asset will be required to provide sufficient information to demonstrate how the proposals would contribute to the asset's conservation.*
4. *The Historic Environment Record, including Conservation Area Character Appraisals and Management Plans will be used to inform the consideration of future development including potential conservation and enhancement measures.*
5. *Great weight will be given to the conservation of the District's heritage assets. Any harm to the significance of a designated or non-designated heritage asset must be justified. Proposals will be weighed against the public benefits of the proposal; whether it has been demonstrated that all reasonable efforts have been made to sustain the*

existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; and whether the works proposed are the minimum required to secure the long term use of the asset.

6. If such harm can be fully justified, where relevant the Council will require archaeological excavation and/or historic building recording as appropriate, followed by analysis and publication of the results.

7. In addition, the following will apply to specific asset types as listed below:

a) City of Bath World Heritage Site:

Development within the City of Bath City World Heritage Site will be expected to comply with Policy B4 of the Core Strategy and all other relevant supplementary information and guidance; and help support the delivery of the World Heritage Site Management Plan.

b) Listed Buildings:

The significance of listed buildings is required to be sustained and enhanced. Appropriate repair and reuse of listed buildings will be encouraged. Alterations, extensions or changes of use, or development in their vicinity, will be expected to have no adverse impact on those elements which contribute to their special architectural or historic interest, including their settings.

c) Conservation Areas:

Development, including any proposed demolition, within or affecting the setting of a conservation area will only be permitted where it will preserve or enhance those elements which contribute to the special character or appearance of the conservation area. The Council will look for opportunities from new development within conservation areas and within the setting of heritage assets to enhance or better reveal their significance.

...

g) Non-designated heritage assets:

Proposals affecting non-designated heritage assets, including unscheduled archaeology, unlisted buildings and local parks and gardens, should ensure they are conserved having regard to their significance.

Where development viability assessments are required developers should demonstrate that the policy requirements, including to sustain and **enhance the District's historic environment, have been considered and reflected in the land or site value."**

Local Plan Policies with regards to the NPPF and the 1990 Act.

4.40 With regard to Local Plan policies, paragraph 213 of NPPF states that:

"existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of this Framework. Due weight should be given to them, according to their degree of consistency with this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given)."

- 4.41** In this context, where local plan policy was adopted well before the NPPF, and does not allow for the weighing of harm against public benefit for designated heritage assets (as set out within paragraph 196 of the NPPF) or a balanced judgement with regards to harm to non-designated heritage assets (see NPPF paragraph 197) then local planning policies would be considered to be overly restrictive compared to the NPPF, thus limiting the weight they may be given in the decision-making process.
- 4.42** In this case, the Placemaking Plan (2017), which sits alongside the Core Strategy (2014), does allow for the balancing exercise to be undertaken, therefore the above policies are considered to reflect the guidance set out within the NPPF.

5. The Historic Environment

5.1 This Section describes the elements of the built historic environment which are relevant to this application.

5.2 There are no built heritage assets located within the Site; however, the Site is located within the bounds of the City of Bath World Heritage Site. The contribution which the Site makes to the overall heritage significance of this asset is thus assessed below.

5.3 The potential contribution which the Site may make to additional built heritage assets within its surrounds, via setting, will also be assessed, where relevant.

Heritage Assets Within the Surrounds of the Site

5.4 With regard to built heritage assets within the surrounds of the Site, Step 1 of the methodology recommended by the Historic England guidance *GPA 3: The Setting of Heritage Assets* (see *Methodology* above) is to identify which designated heritage assets might be affected by a proposed development.

5.5 Development proposals may adversely impact heritage assets where they remove a feature which contributes to the significance of a heritage asset, or where they interfere with an **element of a heritage asset's setting which contributes to its** significance, such as interrupting a key relationship or a designed view.

5.6 Consideration was therefore made as to whether any of the built heritage assets within the surrounding area may include the Site as part of their setting which contributes to their overall heritage significance, and therefore may potentially be affected by the proposed scheme.

5.7 As a result of the urban nature of the surrounds of the Site and the dense built form which exists, it was identified that any designated heritage assets which had the potential to be sensitive to the redevelopment of the Site would be located within the immediate vicinity of the Site.

5.8 Designated heritage assets within 250m of the Site comprise:

- *The Bath Conservation Area;*
- *Grade II Listed Nos. 7-10 (Consec) Victoria Buildings, Including Victoria House (NHLE Ref: 1395094);*
- *Grade II Listed 11-24, Victoria Buildings (NHLE Ref: 1395096);*
- *Grade II Listed Nos. 25, 26 and 27 [Victoria Buildings] (NHLE Ref: 1395099);*
- *Grade II Listed Nos. 30, 31 and 32 [Victoria Buildings / Belvoir Castle] (NHLE Ref: 1395102);*
- *Grade II Listed 18-29 Denmark Road (NHLE Ref: 1395097);*

- *Grade II Listed Governor's House (NHLE Ref: 1935132);*
- *Grade II Listed Charlton House (NHLE Ref: 1395586);*
- *Grade II Listed 1-6, Park View (NHLE Ref: 1394334); and*
- *Grade II Listed Garden Walls Opposite Nos. 1-6 Park View (NHLE Ref: 1394388).*

5.9 There is only one non-designated heritage asset in the immediate vicinity of the Site, namely the Locally Listed façade of the Former Bath Press Building.

5.10 With regard to the heritage assets set out above, initial assessment has identified that only the façade of the Former Bath Press Building has the potential to be sensitive to development within the Site. Thus, only this asset has been taken forward for detailed assessment within this Technical Annex and ES Main Report Chapter 7.

5.11 With regard to the remainder of the asset, the reasoning behind their exclusion is set out below.

Bath Conservation Area

5.12 The Site is located between c.100m and c. 200m from the Conservation Area in this location, the boundary of which is marked by the present course of the River Avon.

5.13 The distance of the Site from the Conservation Area, intervening built form and vegetation and the ongoing redevelopment of the

Bath Western Riverside area, means that there is no intervisibility between the Site and the Conservation Area. Furthermore, the composition of the Site (modern car showrooms with associated garage buildings and hard standing) is not considered to make any contribution to the overall character and appearance of the Conservation Area in areas closest to the Site (defined by the River corridor).

5.14 For these reasons, the Site is not considered to contribute to the heritage significance of the Conservation Area through setting.

5.15 It is also highlighted that no concerns were raised within the Pre-Application advice or Scoping Opinion provided by BANES regarding potential impacts to the Conservation Area, via a change in setting.

Listed Buildings Within the Surrounds of the Site

5.16 With regard to the Listed Buildings within the immediate surrounds of the Site (as listed above), the heritage significance of these assets is primarily derived from the architectural and historic interest of their physical fabric. The setting of the assets also contributes to their significance, although the significance derived from the setting is less than that from its historic fabric.

5.17 Initial consideration of the assets has identified the key aspects **of their physical surrounds and experience ('setting')** which contributes to their heritage significance comprises their immediate boundary plot and position within the associated street scene (and the experience and appreciation of them from such locations), alongside interrelationships (group value),

where relevant.

- 5.18** The Site is not considered to form part of the setting of the Listed Buildings set out above, and thus they are not considered to be sensitive to redevelopment within the Site.
- 5.19** No additional Listed Buildings beyond 250m of the Site have been identified as potentially sensitive to the redevelopment of the Site, via a change in setting.
- 5.20** It is also highlighted that no concerns were raised within the Pre-Application advice or Scoping Opinion by BANES regarding potential impacts to the Listed Buildings, via a change in setting.
- City of Bath World Heritage Site
- 5.21** As set out above, the Site is located within the bounds of the City of Bath World Heritage Site.
- 5.22** It is widely accepted (paragraph 201 of the NPPF) that not all parts of a World Heritage Site will necessarily be of equal significance. In some cases, certain elements of a heritage asset can accommodate substantial changes whilst preserving the significance of any asset which may potentially be affected by development proposals. Significance can be derived from many elements, including the historic fabric of a building, the layout of space or land use associated with a building or an area.
- 5.23** World Heritage Sites are cultural and/or natural sites considered

⁴⁷ ICOMOS, *Guidance of Heritage Impact Assessments for Cultural World Heritage Properties* (2010).

to be of 'outstanding universal value'. The UK signed the 1972 UNESCO World Heritage Convention in 1984, and in doing so it committed to identifying, protecting, conserving and interpreting its World Heritage Sites and passing them on to future generations. The 'outstanding universal value' of World Heritage Sites are fixed by the World Heritage Committee at the time of inscription, and since 2007 have been presented in a 'Statement of Outstanding Universal Value'. The outstanding universal value therefore defines the thinking at the time of inscription and is non-negotiable.⁴⁷

- 5.24** The ICOMOS guidance on Heritage Impact Assessments states that:

"World Heritage sites are thus single heritage assets with an international value that has been clearly articulated. Not everything within them contributes to the outstanding universal value, but those attributes that do must be appropriately protected"⁴⁸ (our emphasis).

- 5.25** The City of Bath World Heritage Site was inscribed in 1987, and is recognised as a place of 'outstanding universal value' for its Roman remains, 18th-century architecture, 18th-century town planning, its role as a setting for social history, and the inspiration derived from its hot springs and natural landscape setting.
- 5.26** The boundary of the City of Bath World Heritage Site is the

⁴⁸ Ibid.

former municipal city boundary, and covers the entirety of the City (c. 2900ha). The wider 'landscape setting' lies beyond the World Heritage Site boundary. There is no formal buffer zone; however, the 'setting' of the World Heritage Site is discussed within the World Heritage Site Setting Supplementary Planning Document (SPD)⁴⁹ and protected through planning policy.

5.27 The World Heritage Committee agreed the City of Bath Statement of Significance at its meeting in July 2008.⁵⁰ This Assessment sets out why the World Heritage Site was put on the World Heritage list and guides the management of the Site for the foreseeable future. The main reasons for Bath's inclusion, i.e. its 'core values' are as follows:⁵¹

- *Roman Archaeology – the Roman Baths and Temple thermal establishment;*
- *The Hot Springs – the only of their kind in Britain, attracting visitors for more than 2,000 years;*
- *Georgian Town Planning – its innovative and cohesive landscaped concept, harmonised with its green valley setting;*
- *Georgian Architecture – neo-classical public buildings and set piece developments such as terraces, crescents, squares and the Circus by Palladian-inspired Bath architects;*

⁴⁹ B&NES Council, *City of Bath World Heritage Site Setting Supplementary Planning Document* (2013).

⁵⁰ <https://whc.unesco.org/en/soc/881>

- *The green setting of the City in a hollow in the hills – the deliberate inclusion of the landscape in the creation of a beautiful city;*
- *Georgian architecture reflecting 18th century social ambitions – its role as a destination for pilgrimage and the social aspirations of the fashionable spa culture that created the Georgian city.*

5.28 The Site is located within *Character Area 7 'Brassmill Lane, Locksbrook and Western Riverside'* of the Bath World Heritage Site. The Bath City-wide Character Appraisal⁵², published in 2005, identifies the area as a flat flood plain and describes it as follows:

*"This is a very varied area with commercial, industrial, residential, public open space, derelict land and leisure uses all set around the river. In places the uses are segregated and in others very mixed. There is, however, an overall dominance of commercial and light industrial uses especially closer to the river and on the lower, flatter ground."*⁵³

5.29 Most buildings in Character Area 7 post-date the early 19th century and building materials vary, with residential buildings constructed of brick or stone, and modern commercial, industrial and utilities buildings clad in a range of materials and often roofed in corrugated metal.

5.30 Trees and vegetation within the Character Area are largely

⁵¹ Taken from *The City of Bath World Heritage Site Management Plan: 2016-2022* (Supported by B&NES and UNESCO, 2016)

⁵² B&NES Council, *Bath City-wide Character Appraisal* (2005), p. 47.

⁵³ *Ibid.*, p. 47.

confined to the west, and along the river and the disused railway lines. By contrast, tree-planting is very sparse along the streets.

- 5.31** There are limited areas of open space within Character Area 7, including the playing field at Newbridge, open areas alongside the river, and derelict sites. The latter have, and continue to be, subject to redevelopment (including the area covered by the Bath Western Riverside redevelopment).
- 5.32** Experiences of Character Area 7 contrast between the noise, traffic and bustle of the main thoroughfares (including Lower Bristol Road), and the tranquility of the riverside path.
- 5.33** In November 2015, a draft Character Area Appraisal for the 'Brassmill Lane, Locksbrook and Western Riverside' **areas of the Bath Conservation Area** was published by B&NES Council, with this including an assessment of Lower Bristol Road and its environs.⁵⁴
- 5.34** Although this document relates specifically to the Bath Conservation Area (which the Site lies outside), the document does set out the contribution that Lower Bristol Road and its environs make to the **'outstanding universal value' and 'core values' of the wider World Heritage Site. Due to the Site's** location on Lower Bristol Road, the conclusions of the Character Area Appraisal are judged to be relevant when assessing the contribution that the Site makes to the heritage significance of

the World Heritage Site.

- 5.35** Although the Site is in proximity to the River Avon, it is not located within the River Corridor, being set back from the riverbank by c. 200m to the south and c. 100m to the east. The Site is separated from the riverbank by Windsor Bridge Road and modern built form to the west, and a large area of industrial land (now largely derelict) to the north which was formerly occupied by the gas works and branches of the Midland Railway.
- 5.36** The changing character and appearance of the Character Area is an important consideration (see discussions in [Section 2](#)). Wide scale, mixed use redevelopment of this industrial area has the potential to enhance the appearance of this part of the Character Area while introducing new built form that would consolidate the visual and spatial separation between the Site and the River Corridor.
- 5.37** [Table 1](#) sets out the conclusions of the Character Area Appraisal with regard to how this **area contributes to the 'core values' of the World Heritage Site**, alongside additional comments relating specifically to the Site.
- 5.38** In summary, it is not considered that the Site contributes to any **of the core values from which the 'outstanding universal value'** and overall heritage significance of the Bath World Heritage Site is derived.

⁵⁴ B&NES Council, *Draft Brassmill Lane, Locksbrook and Western Riverside Character Appraisal: Bath Conservation Area* (2015).

Reason for Inclusion / 'Core Value'	Contribution of the Brassmill Lane, Locksbrook and Western Riverside Area	Comments Regarding the Specific Contribution Made by the Site
Roman Archaeology	Archaeological finds of Roman date have been identified within this, area providing evidence of the broader context of Roman Bath, including the potential of a Roman road along the course of Lower Bristol Road.	No archaeological remains predating the post-medieval period are recorded either within the Site or in close proximity to it – see Archaeological Desk-Based Assessment prepared by Pegasus Group. As such, the archaeological potential of the Site is not considered to contribute to the understanding of Roman Bath.
The Hot Springs	None	-
Georgian Town Planning	None	The Site lies beyond the influence of Georgian town planning.
Georgian Architecture	Minor – There are no major Georgian buildings within the Character Area.	There are no Georgian buildings within the Site, nor are there structures of special architectural interest relating to this period within its immediate vicinity.
Green Setting	Major contributor to the green setting of Bath, forming a highly visible corridor along the course of the Avon for c. 2½ miles from Churchill Bridge.	The Site has already been developed and does not constitute an area of green space. The Site is located approximately 200m to the south and 100m to the east of the river at its nearest points and is not visible along the River Corridor.
Social Setting	None	-

Table 1: Summary of the contribution made by Lower Bristol Road and its environs to the core values of the World Heritage Site.

The Wider Setting

5.39 In 2009, a 'Setting Study' of the City of Bath World Heritage Site was undertaken⁵⁵, with the results published by B&NES Council. Following the 2009 study, the aforementioned 'City of Bath World Heritage Site Setting' SPD⁵⁶ was published by B&NES Council in 2013.

5.40 The introduction to the SPD sets out that its key purpose is to provide information needed for the effective protection and appropriate management of the setting. This is done by: describing and showing where the setting is; defining what is important about the setting; and outlining the process for assessing impacts affecting the setting.

⁵⁵ B&NES, Bath World Heritage Site Setting Study Information Paper (2009)

Planning Document (2013).

⁵⁶ B&NES Council, *City of Bath World Heritage Site Setting Supplementary*

5.41 The SPD states that:

"The setting has different aspects which convey the Outstanding Universal Value. These provide the basis for establishing whether a site or area is within or outside the setting and for understanding the significance of various aspects of the setting. They can be summarised as:

- The distinctive character provided by the topography, the townscape and land-use including the green undeveloped farmland, green spaces, and trees and woodland, landscape features and qualities such as tranquility which characterise the surroundings of the Site.*
- The views afforded from the city to the green hillsides, woodland and open spaces and conversely the opportunities provided by the surroundings to view the city. Typically views into the city are few which reflects the compact form of the city which appears to be contained within a hollow and is surrounded by hills.*
- The historical associations with the city from the key Roman and Georgian periods. These include archaeological sites such as Roman villas, historic buildings such as Kelston Manor and Bailbrook House, historical sites, walks and rides appreciated in Georgian times through to the present day including opportunities for the enjoyment of the natural landscape and activities and features within the landscape including the interpretation and appreciation of the*

'picturesque' qualities of the natural landscape.

- Routes into and out of the city and the quality and character of their environs and views to and from them.*
- The River Avon, the Kennet and Avon Canal and surviving evidence of the Somerset Coal Canal and the quality and character of them and their environs and the views to and from them."⁵⁷*

5.42 Part of the important elements of the setting are views across the World Heritage Site, described within the SPD as the 'visual setting'. The SPD summarises the significant components of the 'visual setting' as follows:

"Views from key buildings and other heritage assets associated with and providing understanding of the site's OUV and attributes including:

- Views from key buildings, landmarks and groups of buildings of the Georgian period. Both those located to take advantage of the view such as Sham Castle, Beckford's Tower and The Royal Crescent and those with incidental or not necessarily planned views.*
- Views from other historically significant locations and assets such as parks designed to take advantage of the view such as Prior Park Gardens and those with incidental or not necessarily planned views.*

⁵⁷ B&NES Council, *City of Bath World Heritage Site Setting Supplementary Planning Document* (2013).

- Views generally from the WHS with greater importance given to the Georgian parts of the city and those views which reveal the site's OUV.
- Views from historic recreational routes including walks, rides and places of interest which were significant in the Georgian period known from literature and illustrations. Some are referred to in the Historical Associations section below and in Appendix 4.
- Views from existing or proposed recreational routes following or near to historical routes including sequential views such as along the river through to incidental glimpsed views and routes which provide appreciation of the attributes of the Site and its setting.
- Views afforded from the River Avon, Kennet and Avon Canal and surviving evidence of the Somerset Coal Canal.
- Views from key routes into and out of the city, both historic and existing including sequential views experienced by travellers entering or leaving the city. The views afforded from and to roads into and out of Bath are described in the relevant section below.
- Views to the green undeveloped hillsides, slopes and skyline.
- Views to trees and woodlands on the skyline and slopes (woodland, tree belts and scattered trees).
- Views to trees, woodlands and open green space along the valley floor.

A key role of the WHS designation is to facilitate understanding and revealing the attributes of the Site and therefore two further categories are included below.

Views to key buildings and other heritage assets associated with and which provide understanding of the sites OUV and attributes including:

- Views of key buildings landmarks and groups of buildings showing them both in their own right and / or in their landscape context.
- Views of the Georgian town in general showing it both in its own right and / or in its landscape context.
- Views of other historically significant locations such as parks.

Views of historic recreational routes:

- Views of key historic routes into and out of the city.
- Views from popular and historically significant viewing points.
- Views to the River Avon, Kennet and Avon Canal and evidence of the route of the Somerset Coal Canal and their corridors.
- Views from the surrounding hills which provide dramatic views into and across the city.
- Views associated with the OUV which have 'picturesque' qualities provided by the landform, the rocks and geology, the historic development, trees and agricultural land-

uses and the way they contrast and complement each other.

Views to proposed sites or areas subject to actual, proposed or potential change

- *Views to proposed sites or areas subject to actual, proposed or potential change seen from key locations such as those listed in paragraph 5.47 or seen in the context of views which provide understanding or appreciation of the site's attributes such as those listed in paragraph 5.49.*⁵⁸

5.43 Appendix 3 of the SPD provides 'information sheets' for a number of significant views which correspond with the summary as set out above, including a description of the content of each viewpoint, its significance and the Zone of Theoretical Visibility (ZTV) from the viewpoint.

5.44 Since the SPD was adopted in 2013, there have been notable changes to the content of these viewpoints, largely precipitated by modern development within the City of Bath and its environs. This includes the high-rise redevelopment of the Bath Western Riverside area to the north and north-east of the Site. These changes have diminished the accuracy of the SPD ZTVs and, in some cases, visibility of the Site is now obstructed by post-2013 built form. As such, care should be taken when consulting these sources to ensure that any relevant changes are taken into account.

⁵⁸ As derived from Ibid.

5.45 Analysis of the SPD ZTVs and the bare earth ZTV relating to the development proposals prepared by Nicholas Pearson Associates (see Technical Annex F), alongside professional judgement, has identified that the Site had the potential to be visible from the following SPD viewpoints:

- *Viewpoint 1 – Prospect Stile;*
- *Viewpoint 2 – Beckford's Tower;*
- *Viewpoint 3 – Lansdown Crescent;*
- *Viewpoint 4 – Approach Golf Course;*
- *Viewpoint 5 – Royal Crescent;*
- *Viewpoint 12 – Alexandra Park;*
- *Viewpoint 13 – Twerton Roundhill;*
- *Viewpoint 15 – Sham Castle*
- *Viewpoint 16 – Widcombe Hill;*
- *Viewpoint 19 – Kelston View; and*
- *Viewpoint 20 – Primrose Hill.*

5.46 An extract from Appendix 3 of the SPD which sets out the location of these viewpoints, alongside the information sheets, is included within [Appendix 1](#) of this Technical Annex.

APPENDIX X 1 – **EXTRACT OF APPENDIX 3 OF THE 'CITY OF BATH WORLD HERITAGE SITE SETTING SUPPLEMENTARY PLANNING DOCUMENT'**

Viewpoint 1 – Prospect Stile

5.47 Viewpoint 1 is located to the northwest of the World Heritage Site (outside of the boundary), c.4km northwest of the Site (Plate 20).

5.48 The SPD describes the viewpoint as follows:

"Panorama of the landscape with distant views of the western edge of Bath, the Avon valley and settlements towards Bristol."

5.49 With regard to the significance of the viewpoint, the SPD states:

"The viewpoint is one of only a few which shows the city in the context of the surrounding hills looking from the outside. The view to Prospect Stile and Kelston Round Hill was praised by John Wood seen from the south west corner of Queen Square soon after its construction. Only determined walkers in the 18th century would have ventured to Kelston Roundhill and Prospect Stile."

5.50 Views from Prospect Stile are 'city wide' and when considering the composition and content as a whole, the Site forms such a negligible part of this view, being part of general built form visible, that it is not considered to make an appreciable individual contribution.

5.51 From this location, the Site and its general surrounds are defined by the existing and ongoing modern redevelopment of the area (see Section 2), set amongst the wider built form of the City.

5.52 The Site does not facilitate or contribute to the ability to experience the landscape context of the World Heritage Site from this location. It is also important to note that the existing modern redevelopment in its surrounds (including built form of seven and eight storeys) does not alter this experience.

Viewpoint 2 – Beckford's Tower

5.53 Viewpoint 2 is located on the far northern boundary of the World Heritage Site, c.2.7km north of the Site (Plate 21).

5.54 The SPD describes the viewpoint as follows:

"There are commanding views of Bath both from the tower and at ground level from Lansdown Cemetery (once part of the pleasure garden) showing its setting and containment within the surrounding hills and open landscape and the characteristic of trees and open landscape extending into the built area from the surrounding landscape."

5.55 With regard to the significance of the viewpoint, the SPD states:

"Beckford's Tower was designed by Henry Goodridge for William Beckford and completed in 1827. It was built to take advantage of the panoramic views of Bath and the surrounding countryside. A pleasure garden was built around the tower with a ride linking the tower and Beckford's residence at number 20, Lansdown Crescent."

5.56 Access to Beckford's Tower was not available during the site

visit, and thus views were assessed from publicly accessible areas within its immediate surrounds.

- 5.57 **Views from Beckford's Tower and its surrounding areas are 'city wide' and** when considering the composition and content as a whole, the Site forms such a negligible part of the view, being part of general visible built form, that it is not considered to make an appreciable individual contribution. The Site does not facilitate or contribute to the ability to experience the landscape context of the World Heritage Site from this location.
- 5.58 Within such views, a considerable amount of modern built form is visible, including the Bath United Hospital complex and existing modern redevelopment within the surrounds of the Site (including built form of seven and eight storeys). Such development forms part of, and blends with, the surrounding urban form and is to scale with the surrounding townscape character and topography. Furthermore, such buildings do not alter the experience and appreciation of the green landscape beyond.
- 5.59 **Incidental views of Beckford's Tower from Lower Bristol Road** within the vicinity of the Site are possible, with these partly facilitated by the low-level nature of the existing built form which it contains (Plate 19). Nevertheless, the incidental views of this 'landmark' from this location are not considered to make any particular contribution to the overall value of the World Heritage Site



Plate 19: Example of an incidental glimpsed view of Beckford's Tower (blue) as seen from the Lower Bristol Road.

Viewpoint 3 – Lansdown Crescent

- 5.60 Viewpoint 3 is located within the World Heritage Site, in an area of residential development to the north of the centre of the City, c.1.4km northwest of the Site (Plate 22).
- 5.61 The SPD describes the viewpoint as follows:
- "Much of the view is restricted by trees in the foreground with occasional glimpses across the valley to the city and hills beyond."*
- 5.62 With regard to the significance of the viewpoint, the SPD states:
- "Lansdown Crescent was designed by John Palmer and built in 1789-1793. The significance of the*

viewpoint is the way the Georgian buildings were designed to fit harmoniously within the landscape setting, offering dramatic views across the Avon valley."

5.63 At pedestrian level, south-facing views from Lansdown Crescent are screened by mature trees and the Site was not readily visible at the time of the site visit. Some minor glimpsed views to the new high-rise development within the Bath Western Riverside area were possible.

5.64 As per previous viewpoints, views from Lansdown Crescent are 'city wide' and when considering the composition and content as a whole, the Site forms such a negligible part of the view, being part of general visible built form (albeit screened by the foreground vegetation), that it is not considered to make an individual contribution. As per the previous comment, such views include extensive areas of modern development, with the presence of high buildings not impacting upon the experience and appreciation of the green landscape beyond.

Viewpoint 4 – Approach Golf Course

5.65 Viewpoint 4 is located within the World Heritage Site, to the north-west of the city core close to the Royal Crescent, c.0.8 - 1.km northwest of the Site (Plate 23).

5.66 The SPD describes the view looking south as follows:

"The view looking south from the Approach Golf Course extends across the city to the north facing slopes of hills at the edge of the city. Roads and

streets, interspersed with greenery, climb up the north facing slopes."

5.67 With regard to the significance of the viewpoint, the SPD states:

"This viewpoint is on the route of a popular circular 18th century walk which took in the Middle Common (now Victoria Park) and Sion Hill with views across Bath. Part of this route is now the southern section of the Cotswold Way National Trail. The open landscape provided a spectacular view across the valley in the 18th century which can still be enjoyed today. It was also valued for the view eastwards to Lansdown Crescent and All Saints Chapel (since bombed and destroyed in the 1942 Baedeker raids) and the later Cavendish Place and Cavendish Crescent."

5.68 Views from the Approach Golf Course are 'city wide', and the visibility of the hills and greenery to the south is identified as a key element of the viewpoint. Dense vegetation within the golf course and along its southern boundary, including that which lines the public right of way, screens views southwards.

5.69 Glimpsed views in the direction of the Site and the existing modern built form of the Bath Western Riverside area and Roseberry Place were identified within the surrounds. During the winter months, the extent of vegetation is likely to still provide a high degree of screening of view in this direction.

5.70 Even when allowing for glimpsed views to the Site within tableaux from this viewpoint, and the route of the PRoW, the Site evidently blends with the wider urban built form and is not considered to make an individual contribution.

5.71 The Site does not facilitate or contribute to the ability to experience the landscape context of the World Heritage Site from this location. It is also important to note that the existing modern redevelopment in its surrounds (including built form of seven and eight storeys) does not alter this experience.

Viewpoint 5 – Royal Crescent

5.72 Viewpoint 5 is located within the World Heritage Site, in the vicinity of the iconic Royal Crescent, c.0.8km northeast of the Site (Plate 24).

5.73 The SPD describes the viewpoint as follows:

"Royal Crescent Lawns dominate the foreground with a fringe of mature trees along Royal Avenue concealing the Avon valley and near views of the city."

5.74 With regards to the significance of the viewpoint, the SPD states:

"The Royal Crescent was built by John Wood the younger in 1767-1775. It is significant in its design which was intended to look outwards over the landscape and also to be viewed from a distance. The fields below the Royal Crescent which were accessed by the Gravel Walk became one of the most fashionable promenades in Bath. (see Appendix 4 View 5 Crescent Fields.) It is still a popular location for visitors to view the iconic Royal Crescent."

5.75 Evidently, the Royal Crescent was designed to command long-range views southwards and to be a highly visible feature of the landscape.

5.76 Based on the ZTVs accompanying the SPD there is potential for intervisibility between the Site and the Royal Crescent, although such views are long-distance and evidently filtered by intervening vegetation (much of which is evergreen) and existing built form. Topography is also an important consideration; the Site and the existing redevelopment which surrounds it (including that of the Bath Western Riverside area^{1`}), is located at the bottom of the river valley, meaning that views from the Royal Crescent are directed over the Site towards the hills and countryside beyond.

5.77 At the time of the site visit, the Site was not visible in south-westerly facing views when stood at pedestrian level within the Royal Crescent.

5.78 Ultimately, the Site is considered to form a negligible part of key views from the Royal Crescent towards the wider landscape in the south. When considering the composition and content of views from Viewpoint as a whole, the Site is not considered to make an individual contribution.

Viewpoint 12d – Alexandra Park

5.79 Viewpoint 12d is located within the World Heritage Site and includes north-west facing views from within the bounds of Alexandra Park towards Western Riverside. Alexandra Park is located c.1.5km southwest of the Site (Plate 25).

5.80 The SPD describes the viewpoint as follows:

"View down Shelley Road over Oldfield Park to Twerton and open countryside beyond. The built city blends into distant green hills and woodland along the Avon Valley."

5.81 With regard to the significance of the viewpoint, the SPD states:

"This viewing point was part of a series of important routes during the Georgian period. The view from Magdalen Gardens was particularly popular with illustrators in the 18th century and the surviving plaque erected in the 1920s is testament to the ongoing appreciation of this view."

5.82 Glimpsed views of the Site, alongside the modern redevelopment which surrounds it, were identifiable during the site visit from isolated areas on the west side of Alexandra Park.

5.83 As per previous discussions, views from Alexandra Park are 'city wide' and when considering the composition and content as a whole, the Site forms such a negligible part, being part of general built form visible, that it is not considered to make an appreciable individual contribution.

5.84 The Site does not facilitate or contribute to the ability to experience the landscape context of the World Heritage Site from this location. It is also important to note that the existing modern redevelopment in its surrounds (including built form of seven and eight storeys) does not alter this experience.

Viewpoint 13 – Twerton Roundhill

5.85 Viewpoint 13 is located on the far south-western boundary of the World Heritage Site, c.1.8km southwest of the Site (Plate 26).

5.86 The SPD describes the viewpoint as follows:

"Panoramic 360 degree view including the Newton Brook valley and open undulating rural landscape to the south and west and over Bath looking north taking in the Bristol Channel and Wales in the far distance to the west and Claverton Down to the east".

5.87 With regard to the significance of the viewpoint, the SPD states:

"Twerton Roundhill is a strong topographical feature. It provides a popular public viewpoint on the south side of the city which shows the Georgian city in the context of the surrounding hills. Great Pulteney Street is thought to have been designed to line up with the hill seen from the Holburne Museum end."

5.88 Again, such views are city wide, and include elements of the historic core and modern urban development with the green landscape visible beyond.

5.89 The Site does not facilitate or contribute to the ability to experience the landscape context of the World Heritage Site from this location. It is also highlighted that there is existing modern redevelopment in its surrounds (including the Bath Western Riverside and Roseberry Place). The forthcoming redevelopment of the former Bath Press Site complex will also be visible from this location in the foreground of the Site. The

Site itself is not readily visible in such views and therefore forms a negligible part of the content of this viewpoint.

Viewpoint 15 – Sham Castle

5.90 The Sham Castle viewpoint is located on the eastern boundary of the World Heritage Site. c.2.7km east of the Site (Plate 27).

5.91 The SPD describes the viewpoint as follows:

"View framed by trees looking from the east of the city towards the west. The view takes in trees in the foreground, the proposed development site at Western Riverside in the middle distance and distant views of the countryside and hills."

5.92 With regard to the significance of the viewpoint, the SPD states:

"Sham Castle was built in 1762 as an eye-catching folly to be seen from Ralph Allen's townhouse and was probably designed by Sanderson Miller. Bathampton Down itself was popular in the 18th and 19th century for its views and riding. Literary references to it include those by Spencer Cowper, William Pitt and Jane Austen. It was used for horse racing over a 2 mile course and later Ralph Allen made a carriage drive to show off the skyline views. This ran around the periphery of Bathampton Down and extended as far as Rush Hill."

5.93 The SPD specifically identifies the Bath Western Riverside area as being visible from Sham Castle, and ZTVs included within the SPD highlight potential for Sham Castle to be visible from the Site.

5.94 However, intervisibility between Sham Castle and the Site has since been obstructed by the new buildings, exceeding five

storeys, that are located north-east of the Site, constructed as part of the partially completed Bath Western Riverside redevelopment.

5.95 These new buildings north-east of the Site are visible from Sham Castle, although they blend with the general built form of Bath City and do not obstruct views to key landmarks or the countryside beyond. The Site itself does not appear to be visible from the viewpoint due to the presence of this new intervening built form. As such, the Site is thus not considered to contribute to the significance of the viewpoint.

Viewpoint 16 – Widcombe Hill

5.96 Viewpoint 16 is located within the south-eastern part of the World Heritage Site, c.2.2km east of the Site (Plate 28).

5.97 The SPD describes the viewpoint as follows:

"View of the Georgian city within the hollow of the surrounding hills with distant views west along the River Avon valley."

5.98 With regard to the significance of the viewpoint, the SPD states:

"In the 18th century Widcombe Hill provided, and still does today, some of the best panoramic views to the west and north of the city seen from the east. Georgian buildings are seen in the context of the surrounding hills and the green River Avon valley."

5.99 Views are 'city wide' and when considering the composition and content as a whole, the Site forms such a negligible part, being part of general built form visible, that it is not considered to

make an appreciable individual contribution.

Viewpoint 19 – Kelston View

- 5.100** Viewpoint 19 is located in the far western part of the World Heritage Site, c.1.2km southwest of the Site (Plate 29). There is no accompanying information sheet for Viewpoint 19 within the SPD.
- 5.101** Views are again 'city wide' and include vast views across the built form of the City, with the wider green landscape beyond. Within this view, the new high-rise buildings within the surrounds of the Site are clearly visible. However, the inclusion of this new built form within the view has not impacted upon the experience and appreciation of the significant elements of the viewpoint.
- 5.102** The Site itself can be glimpsed in these long-distance views but ultimately blends with the surrounding built form and is overshadowed by the new high rises immediately to the north east, and other new development within its surrounds. The forthcoming redevelopment of the former Bath Press complex will also be visible from this location. When considering the composition and content as a whole, the Site forms such a negligible part of this view, being part of the general visible built form, that it is not considered to make an appreciable individual contribution.

Viewpoint 20 – Primrose Hill

- 5.103** Viewpoint 20 is located in the far north-western part of the World Heritage Site, c. 1.5km northwest of the Site (Plate 30). There is no accompanying information sheet for Viewpoint 20 within the SPD.
- 5.104** As per previous viewpoints, views from this location are 'city wide' and contain a large degree of built form and foreground vegetation. The Site is not the focus of any of the views from Primrose Hill and is not readily discernible. As such, the Site is not considered to make an appreciable contribution to the content or significance of the views.



Plate 20: View southeast in the direction of the Site (and the City of Bath) from Prospect Stile, Viewpoint 1.



Plate 21: View southeast in the direction of the Site (and the City of Bath) from within the vicinity of Beckford's Tower, Viewpoint 2.



Plate 22: View in the direction of the Site (not visible) from the Lansdown Crescent, Viewpoint 3.



Plate 23: Example of views in the direction of the Site (with the Western Riverside area redevelopment is visible) from one element of the PRow of the Golf Course Approach (i.e. in the vicinity of Viewpoint 4).



Plate 24: View in the direction of the Site (not visible) from the Royal Crescent, Viewpoint 5.



Plate 25: Example of views in the direction of the Site (with the Western Riverside area redevelopment is visible) from the western extent of Alexandra Park, Viewpoint 12d.



Plate 26: View northeast in the direction of the Site (and the City of Bath) from Twerton Roundhill, Viewpoint 13.



Plate 27: View in the direction of the Site (and the City of Bath) from Sham Castle, Viewpoint 13.



Plate 28: View in the direction of the Site (and the City of Bath) from Widcombe Hill, Viewpoint 16.



Plate 29: View northeast in the direction of the Site from Kelston View, Viewpoint 19.



Plate 30: View southeast in the direction of the Site from Primrose Hill, Viewpoint 20.

Contribution of the Site to the World Heritage Site

- 5.105** When considering the contribution made by the Site to the heritage significance of the City of Bath World Heritage, it is important to recognise that the World Heritage Site covers an extremely large area (c.2900ha) and includes a wide variety of areas of differing characters. Not all areas will necessarily **contribute to the 'core values' and 'outstanding universal value'** of the World Heritage Site, and some areas contribute more to the heritage significance of the World Heritage Site than others.
- 5.106** The Site itself represents an extremely small portion of the total area covered by the World Heritage Site and, as noted in the NPPF at paragraph 201 and ICOMOS guidance, it is necessary to consider the relevant significance of the element which has the potential to be affected and its contribution to the significance of the designation as a whole, i.e. would the application proposals undermine the significance of the World Heritage Site as a whole?
- 5.107** **Based on a review of the 'core values'** of the World Heritage Site, and the conclusions set out in [Table 1](#), the Site is not considered to contribute to the **'outstanding universal value'** of the World Heritage Site from which its significance is derived.
- 5.108** The Site is indistinctly visible within wide-ranging views from several identified viewpoints located within the World Heritage Site and **its immediate environs. However, such views are 'city wide', with the Site forming an** indistinguishable and negligible part of the visible built form of Lower Bristol Road
- 5.109** The Site, in terms of both its location and existing built form, is not considered to make any specific contribution nor detract from the overall content of the views identified.
- 5.110** Notably, the Site does not facilitate or contribute to the ability to experience the landscape context of the World Heritage from this location. It is also highlighted that the existing modern redevelopment in its surrounds (including built form of seven and eight storeys) does not alter this experience. The character of the Lower Bristol Road in terms of this modern redevelopment is also continuing to evolve.
- 5.111** Within more immediate views of the Site from within the bounds of the World Heritage Site, i.e. from Lower Bristol Road, the Site does not make any contribution to the experience or appreciation of the World Heritage Site **or its 'outstanding universal value'**. **The same is also considered to be the case for** other incidental views of the Site from within the World Heritage Site. Within all such views, the Site is seen within the context of the ongoing redevelopment of the Lower Bristol Road area.
- 5.112** It should also be highlighted that within the July 2010 Committee Report for the Outline Application for the Bath Western Riverside area (LPA Ref: 06/01733/EOUT), which includes the eastern part of the Site, it is stated that a site visit was carried out and a UNESCO delegation concluded that *"the World Heritage Site was already being effectively managed, and that the character of the proposed development at Bath Western Riverside (and especially the first phase) was appropriate in its*

World Heritage site setting."

5.113 Furthermore, in an early 2007 Committee Report, the Case Officer stated:

"Your Officers' advice is that the city's World Heritage Site status will not be materially prejudiced by this [the Bath Western Riverside] development."

The Former Bath Press Building

5.114 The Locally Listed main (northern) façade of the former Bath Press Building is located to the south of the Site, on the opposite site of Lower Bristol Road. Only this façade now remains, with the remainder of the complex having been demolished in 2017 as part of the ongoing major mixed-use redevelopment scheme (LPA ref. 15/02162/EFUL).

5.115 The Bath Press Building was established by Sir Isaac Pitman (1813–1897) in 1889 as the Phonetic Institute. The building was extended in 1901 and 1913, before being substantially modified and expanded between 1919 and 1926 by Bristol architects Oatley and Lawrence.

5.116 The surviving façade of the former Press building is of 32 bays and dates from the major reconstruction and extension works of 1919–1926. It is constructed of ashlar in a simplified neo-classical style with Art-Deco detailing.



Plate 31: The former Bath Press Building facade as seen from Lower Bristol Road.

5.117 At the time of the site visit the façade was supported and obscured by scaffolding following the demolition of the remainder of the structure (Plate 31); however, it was described by Historic England (then English Heritage) in 2007 as follows:

"The recessed bays of the façade are marked by plain pilasters with each fourth bay marked with a pilaster in banded rustication, with a plain parapet above. The outer bays have on each floor, tall, metal casement windows of six by five panes with a central support. Narrower windows of four by six panes flank the entrances. Its main entrance is situated off-centre to the left. It is three bays wide and has a central door with steps leading up to it from the pavement. It has three lights above the door, and is

*flanked on either side by Greek Revival columns with tall casement windows on either side to each floor. The whole ensemble is set between double pilasters and topped with a stepped Art Deco style pediment with a central clock set in a decorative surround. Off centre to the right is the workers entrance, with a doorway (probably late 20th century), with a stone surround decorated with rosettes.*⁵⁹

5.118 Historic maps and aerial photographs (see Section 2 and Plate 33) show that the Press Building was originally surrounded by industrial development, although the terraced houses to the south were extant. These dwellings had been purchased by Pitman and Sons, probably in the late 19th century, for housing their workers, and continued to function as such until the later 20th century.⁶⁰

5.119 As currently extant, the façade of the former Press Building stands on the southern side of Lower Bristol Road within a large area of brownfield that it currently undergoing mixed-use redevelopment (see Plate 12). Once completed, the façade will provide the Lower Bristol Road fronting elements of a new residential complex (Plate 32).



Plate 32: Visualisation of the Bath Press redevelopment as seen from Lower Bristol Road.

⁵⁹ Historic England, 'The Bath Press Building', *PastScape*, https://www.pastscape.org.uk/hob.aspx?hob_id=1463658&sort=2&rational=m&recordsperpage=60&maplat=51.37180000&maplong=-2.41700000&mapisa=10000&mapist=ll&mapilo=-2.4170&mapila=51.3718&mapiloe=w&mapilan=n&mapios=ST709637&mapigrn

=163776&mapigre=370977&mapipc=&p=2&move=n&nor=2386&recfc=0 (accessed 09/03/2020).

⁶⁰ Ibid.



Plate 33: 1932 aerial photograph of the Bath Press (then the *Phonetic Institute Print Works* or '*Pitman Press*').
Source: Britain From Above, <https://britainfromabove.org.uk/en/image/EPW038336>

Statement of significance

5.120 The former Bath Press Building is classified by BANES as a Locally Listed Building and thus represents a non-designated heritage asset in the terms of the NPPF.

5.121 The heritage significance is derived from the historic, architectural and artistic interest of its physical fabric as a prominent neo-classical structure with Art-Deco architectural detailing that is illustrative of industrial development along Lower Bristol Road during the early 20th century. This significance has however been eroded by way of the loss of the remainder of the building.

5.122 The setting of the Bath Press Building also contributes to the significance of the asset, although the significance derived from the setting is less than that from its historic fabric. The principal elements of the physical surrounds and experience of the asset **(its 'setting') which are considered** to contribute to its heritage significance comprise:

- *The relationship with Lower Bristol Road, which was historically the main access point to the Press complex, and the experience and appreciation of the asset from this location; and*
- *The relationship with the 19th-century terraced houses to the northeast which were historically associated with the Press Building, having been purchased to house the workers.*

The Contribution of The Site

5.123 Despite its proximity to the former Bath Press Building, the Site makes no specific contribution to the heritage significance of the non-designated heritage asset, through setting. Within this context, the former industrial character and appearance of the Site (i.e. that which could be seen as contemporary with the Bath Press Building) was removed by its subsequent commercial redevelopment, therefore it does not contribute to the general historic industrial surrounds of the non-designated heritage asset.

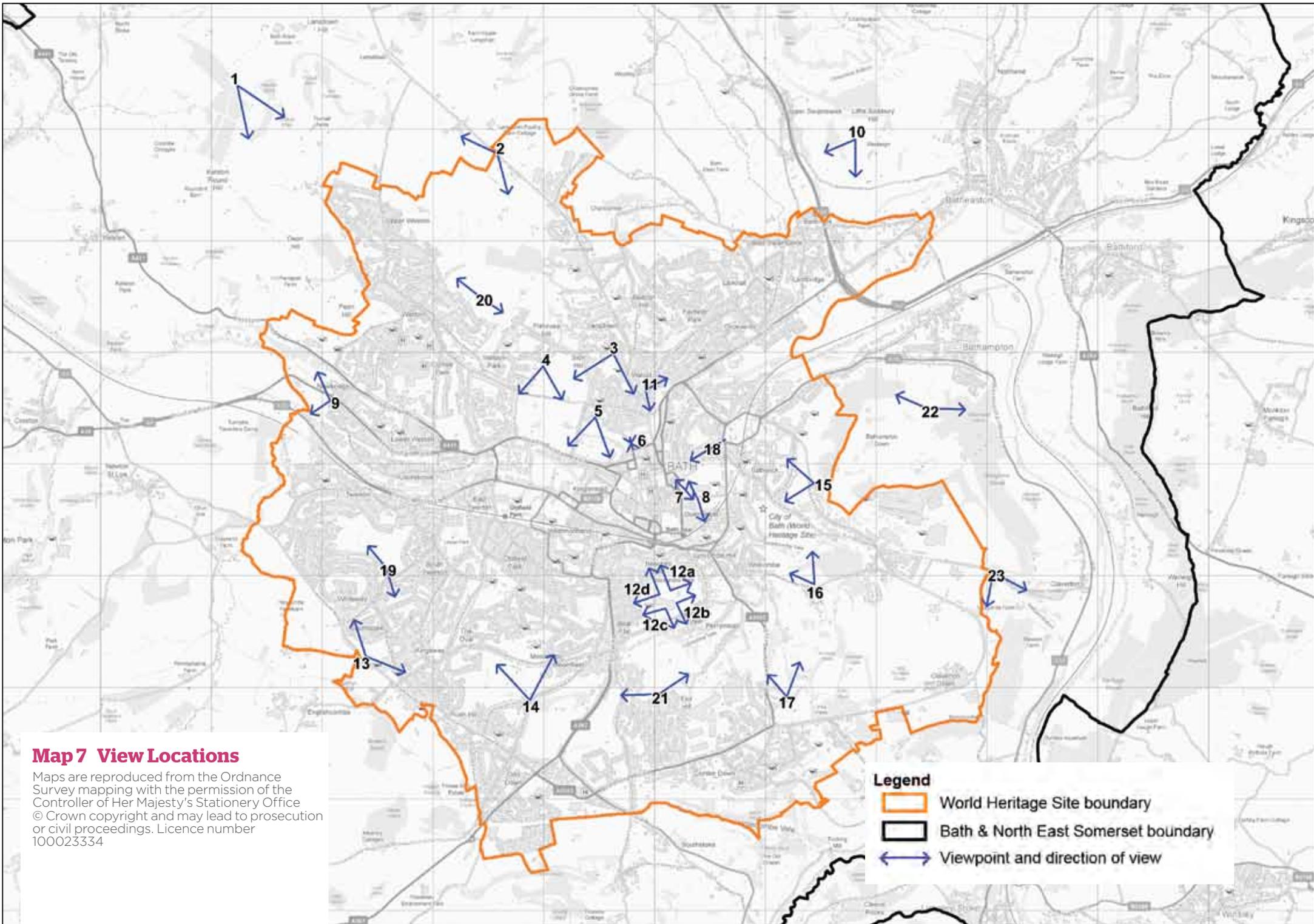
5.124 In terms of views to the north façade of the Bath Press Building, the Site is a peripheral element of long-range views to the non-designated asset and does not obstruct any key views.

5.125 Nevertheless, it is acknowledged the Site forms part of the immediate street scene within which the façade of the building is located and appreciated, and thus the asset may be sensitive to change within the Site with this regard, i.e. potential alterations to manner to which the asset is experienced from Lower Bristol Road.

8. Conclusions

- 8.1 This a Built Heritage Technical Annex has provided the basis for the ES Main Report Chapter 7.
- 8.2 It has provided a background historic narrative on the built heritage elements as well as a preliminary assessment in order to identify those assets with the potential to experience impacts from the proposed scheme.
- 8.3 This report has set out the significance and Outstanding Universal Values of the identified heritage assets, including the contribution made to significance by the setting and the views to, from and within the assets.
- 8.4 This Assessment has identified that the only heritage assets with the potential to be impacted by the scheme, and therefore to be assessed in full within the ES Main Report Chapter 7, are the City of Bath World Heritage Site and the non-designated, Locally Listed façade of the former Bath Press Building.

Appendix 1: Extract of Appendix **3** of the '**City of Bath** World Heritage Site Setting Supplementary Planning **Document**'



Map 7 View Locations

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Legend

- ▭ World Heritage Site boundary
- Bath & North East Somerset boundary
- ↔ Viewpoint and direction of view

Appendix 3

Information Sheets and Computer Generated View-shed Maps for a Selection of Views (note: viewsheds cut off at 5km from the viewpoint)

1 Prospect Stile

Significance of Viewpoint

The viewpoint is one of only a few which shows the city in the context of the surrounding hills looking from the outside. The view to Prospect Stile and Kelston Round Hill was praised by John Wood seen from the south west corner of Queen Square soon after its construction. Only determined walkers in the 18th century would have ventured to Kelston Roundhill and Prospect Stile.

Description of View

Panorama of the landscape with distant views of the western edge of Bath, the Avon valley and settlements towards Bristol.

Historic Built Features

Distant views of the city including Prior Park Mansion and Beckford's Tower.

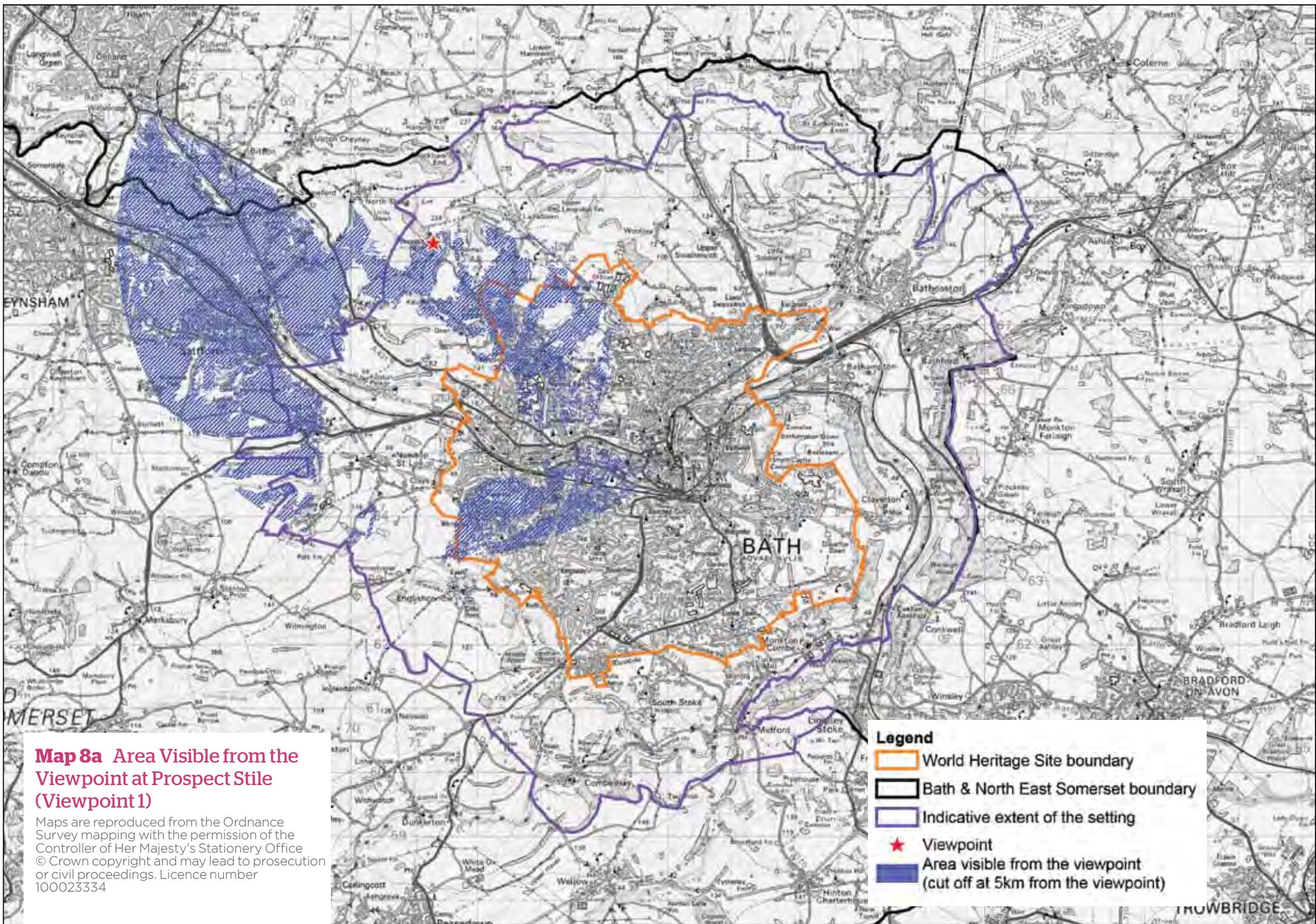
Landscape and Topographical Features

Bath is laid out to the south showing the city in a hollow surrounded by hills. Near views include fields, hedges and copses above Weston village and towards Kelston Roundhill. Middle distance views extend to the ridge of the Cotswold Way to the south. Distant views include the Avon Valley and the hills beyond to the south, the wooded slopes of Bathampton Down, Twerton Roundhill, the hills above Newton St. Loe, Stantonbury Hill and distant Somerset hills.

Other Built Features

Weston village and distant views of the development rising up the slopes of Baths hollow including Bathampton, The University of Bath, Widcombe. Southdown, Odd Down and Twerton.





Map 8a Area Visible from the Viewpoint at Prospect Stile (Viewpoint 1)

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Legend

-  World Heritage Site boundary
-  Bath & North East Somerset boundary
-  Indicative extent of the setting
-  Viewpoint
-  Area visible from the viewpoint (cut off at 5km from the viewpoint)

2 Beckford's Tower and Lansdown Cemetery

Significance of Viewpoint

Beckford's Tower was designed by Henry Goodridge for William Beckford and completed in 1827. It was built to take advantage of the panoramic views of Bath and the surrounding countryside. A pleasure garden was built around the tower with a ride linking the tower and Beckford's residence at number 20, Lansdown Crescent.

Description of View

There are commanding views of Bath both from the tower and at ground level from Lansdown Cemetery (once part of the pleasure garden) showing its setting and containment within the surrounding hills and open landscape and the characteristic of trees and open landscape extending into the built area from the surrounding landscape.

Historic Built Features

There are only glimpsed views to the Georgian city which is largely concealed by the topography and vegetation. The later Brown's Folly is visible in the distance.

Landscape and Topographical Features

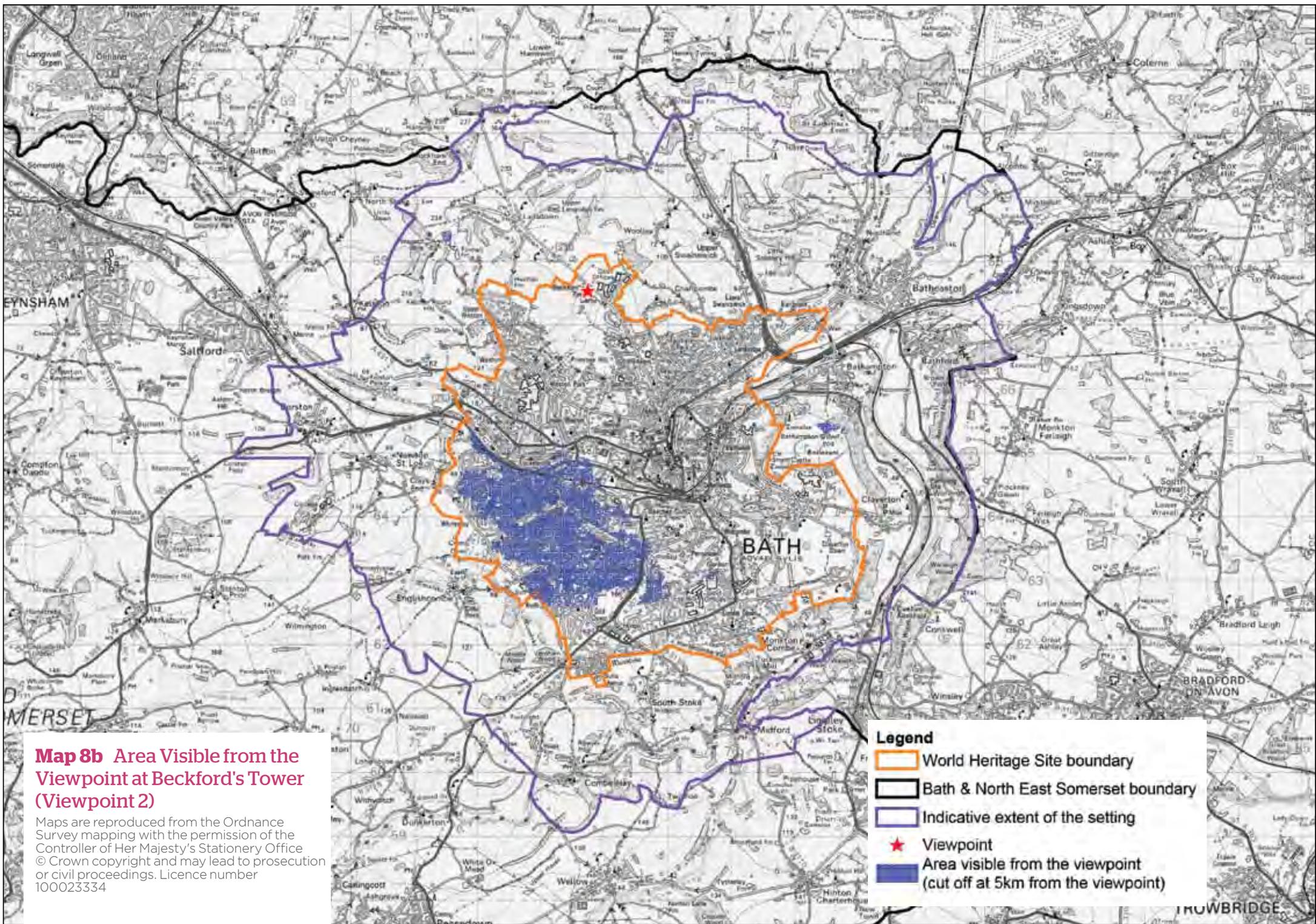
Views include the Lansdown Cemetery and the south western slopes of Lansdown Hill in the near distance. Dean Hill forms a major part of the view in the middle distance. Long distance views extend to Little Solsbury Hill, Bannerdown, Odd Down plateau, Padley Bottom western slopes, Newton Brook valley and undulating plateau, the southern slopes of the River Avon valley between Newton St. Loe and Twerton, distant Somerset hills, Salisbury Plain and the Westbury White

Horse, Kelston Round Hill, Prospect Stile and Bath racecourse. Views to green spaces within the city include Beechen Cliff, St James Cemetery, Stirtingale Farm, The Tumps, Brickfields, Locksbrook Cemetery, Bath City Farm, Carrswood and the well treed corridor of the River Avon.

Other Built Features

Ensleigh Ministry of Defence offices, Bathford, Weston Park housing, Royal United Hospital, Weston, Western Riverside gas holders, Oldfield Park, Moorlands, Twerton and Whiteway housing, Brickfields and Lymore Avenue.



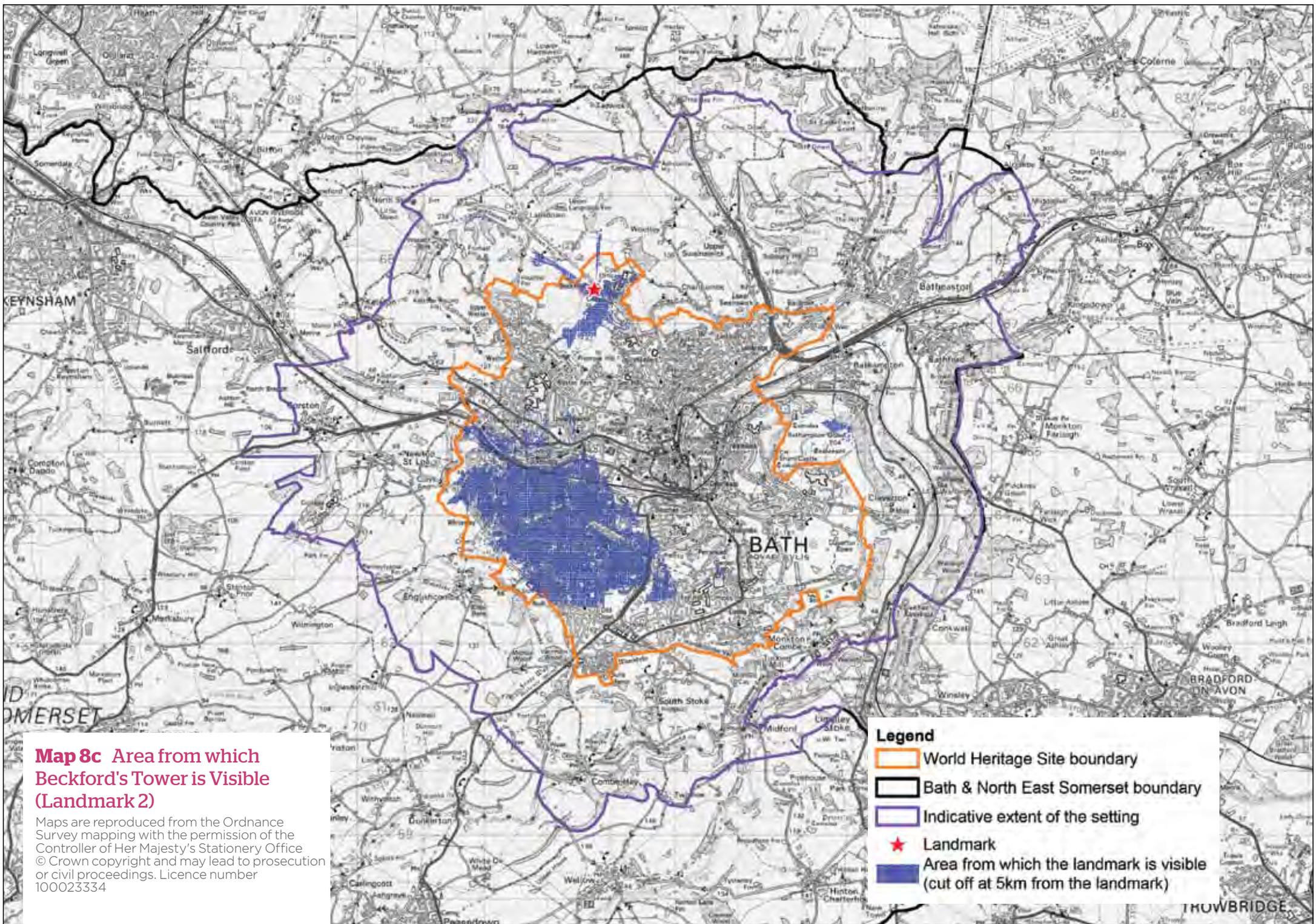


Map 8b Area Visible from the Viewpoint at Beckford's Tower (Viewpoint 2)

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Legend

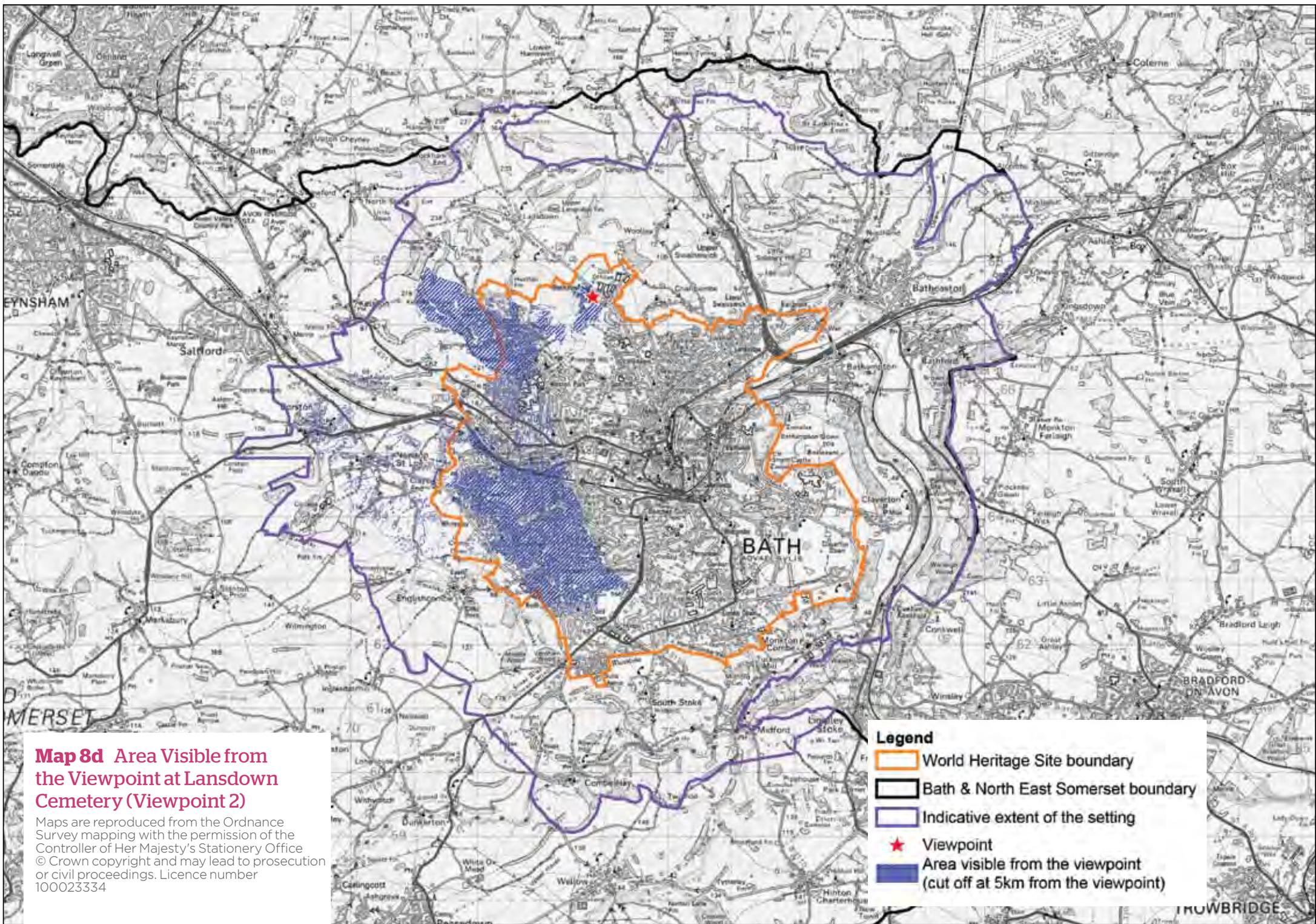
- World Heritage Site boundary
- Bath & North East Somerset boundary
- Indicative extent of the setting
- ★ Viewpoint
- Area visible from the viewpoint (cut off at 5km from the viewpoint)



Map 8c Area from which Beckford's Tower is Visible (Landmark 2)

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- Legend**
- World Heritage Site boundary
 - Bath & North East Somerset boundary
 - Indicative extent of the setting
 - ★ Landmark
 - Area from which the landmark is visible (cut off at 5km from the landmark)



Map 8d Area Visible from the Viewpoint at Lansdown Cemetery (Viewpoint 2)

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Legend

- World Heritage Site boundary
- Bath & North East Somerset boundary
- Indicative extent of the setting
- ★ Viewpoint
- Area visible from the viewpoint (cut off at 5km from the viewpoint)

3 Lansdown Crescent

Significance of Viewpoint

Lansdown Crescent was designed by John Palmer and built in 1789-1793. The significance of the viewpoint is the way the Georgian buildings were designed to fit harmoniously within the landscape setting, offering dramatic views across the Avon valley.

Description of View

Much of the view is restricted by trees in the foreground with occasional glimpses across the valley to the city and hills beyond.

Historic Built Features

There is a clear view of Prior Park Mansion to the south east. The Georgian city is largely concealed behind trees.

Landscape and Topographical Features

Near views are predominantly green with fields and trees. Middle distant views include Locksbrook Cemetery with a glimpse of the chapel spire. Views to the south include Twerton Roundhill and Twerton Hill Farm. Views to the west include Carrs Wood, the ridge above Newton Brook, the River Avon valley and Winsbury and Stantonbury Hills.

Other Built Features

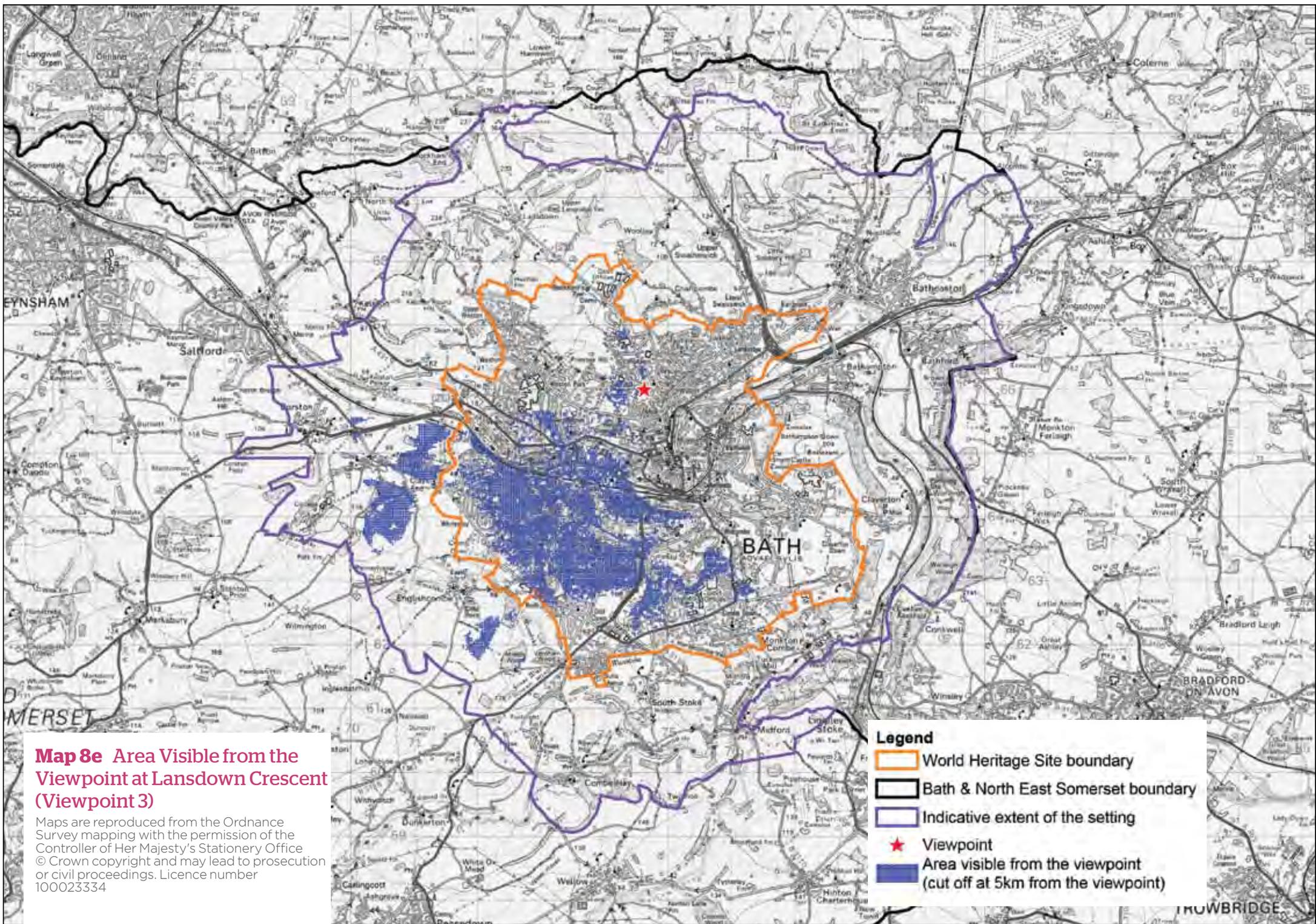
Western Riverside gas holders, Twerton housing, Twerton football ground, Lymore Park nursing home and housing at Southdown

Thomas Robins 'From Near St. Winifred's Well'



Panorama looking South West



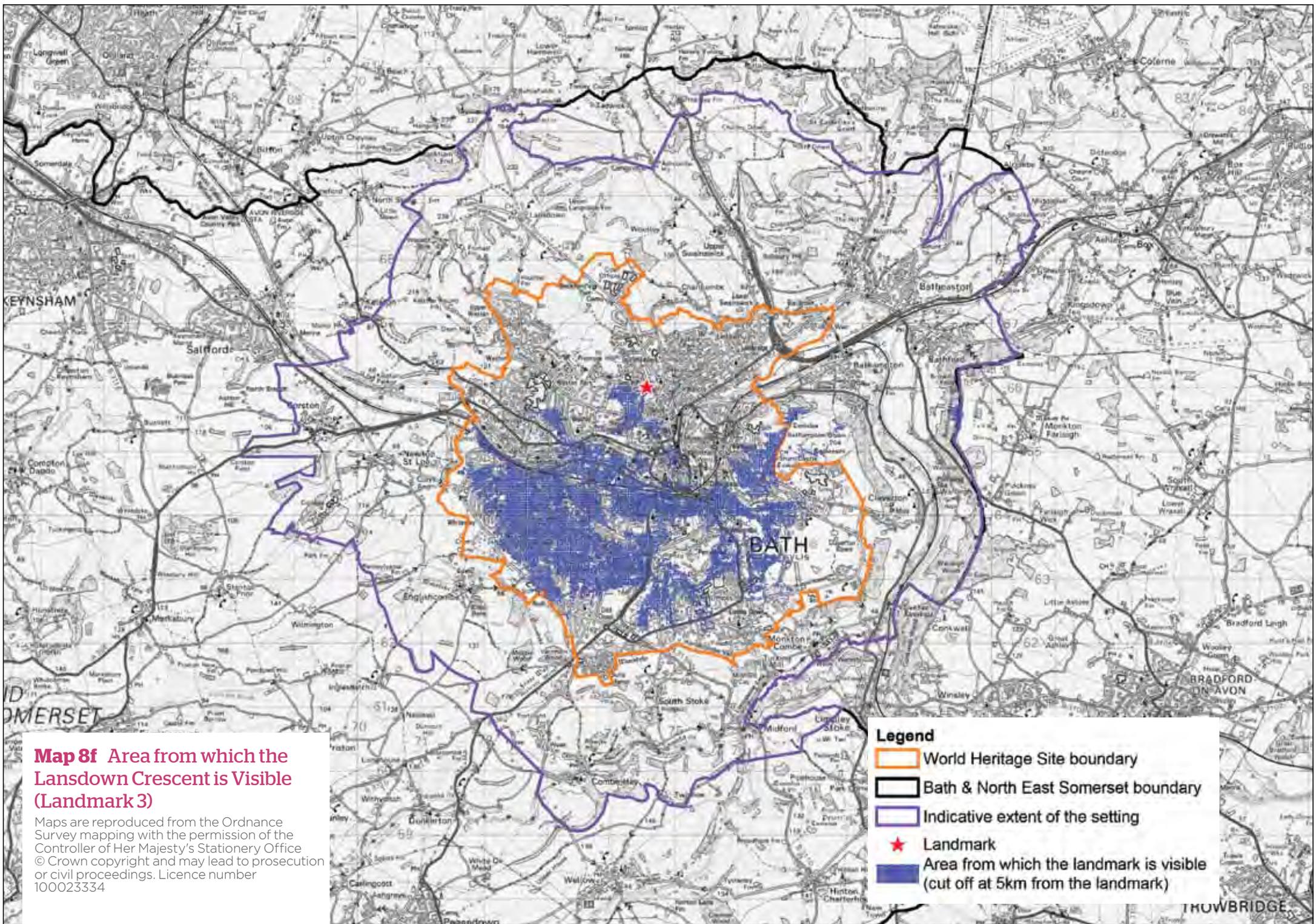


Map 8e Area Visible from the Viewpoint at Lansdown Crescent (Viewpoint 3)

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Legend

- World Heritage Site boundary
- Bath & North East Somerset boundary
- Indicative extent of the setting
- ★ Viewpoint
- Area visible from the viewpoint (cut off at 5km from the viewpoint)



Map 8f Area from which the Lansdown Crescent is Visible (Landmark 3)

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Legend

- World Heritage Site boundary
- Bath & North East Somerset boundary
- Indicative extent of the setting
- ★ Landmark
- Area from which the landmark is visible (cut off at 5km from the landmark)

TROWBRIDGE

4 Approach Gold Course

Significance of Viewpoint

This viewpoint is on the route of a popular circular 18th century walk which took in the Middle Common (now Victoria Park) and Sion Hill with views across Bath. Part of this route is now the southern section of the Cotswold Way National Trail. The open landscape provided a spectacular view across the valley in the 18th century which can still be enjoyed today. It was also valued for the view eastwards to Lansdown Crescent and All Saints Chapel (since bombed and destroyed in the 1942 Baedeker raids) and the later Cavendish Place and Cavendish Crescent.

Description of View

The view looking south from the Approach Golf Course extends across the city to the north facing slopes of hills at the edge of the city. Roads and streets, interspersed with greenery, climb up the north facing slopes.

Historic Built Features

Near views include Somerset Place and Cavendish Place. Middle distance views include Portland Place, St James Square and New King Street. Distant views include Sham Castle and Bloomfield Crescent.

Landscape and Topographical Features

Near views include the Approach Golf Course, Royal Victoria Park and Locksbrook Cemetery. Middle distance views include Claverton Down, The Tumps, Twerton Hill Farm, Stirtingale Farm, Moorlands School grounds and the Brickfields open space. There are distant views of the hills and ridge above Newton St Loe, Winsbury Hill and Twerton Roundhill.

Other Built Features

Near views include St Stephen's Church, housing at Westmoreland, new housing at Rush Hill, Western Riverside including the gas holders, Wellsway, Holloway, Southdown and 19th century housing in Twerton on the lower north facing slopes. Middle distance views include Bath University.

View towards Lansdown Crescent and All Saints Chapel published by Robertson



5 Royal Crescent

Significance of Viewpoint

The Royal Crescent was built by John Wood the younger in 1767-1775. It is significant in its design which was intended to look outwards over the landscape and also to be viewed from a distance. The fields below the Royal Crescent which were accessed by the Gravel Walk became one of the most fashionable promenades in Bath. (see Appendix 4 View 5 Crescent Fields.) It is still a popular location for visitors to view the iconic Royal Crescent.

Description of View

Royal Crescent Lawns dominate the foreground with a fringe of mature trees along Royal Avenue concealing the Avon valley and near views of the city.

Historic Built Features

The curve of the Crescent and railings frame near views of Marlborough Buildings and Brock Street. Prior Park Mansion can be seen in the distance to the east.

Landscape and Topographical Features

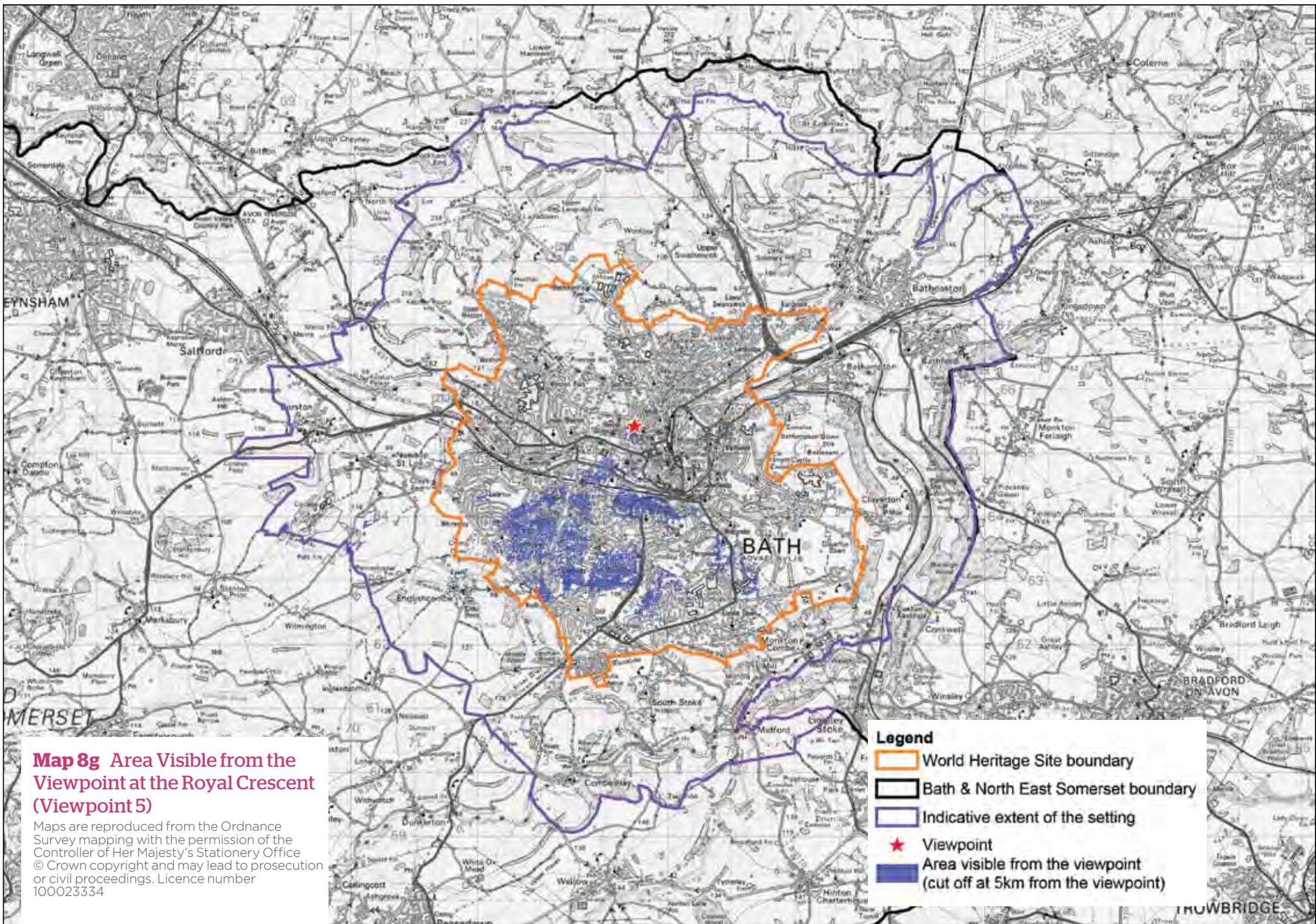
There are near views of the Royal Crescent lawns and the trees of Royal Victoria Park which form a visual barrier to the city in the summer. The mid views to the south are of the greenery on the north facing slopes of Beechen Cliff, Stirtingale Farm, Claverton Down, and Twerton Roundhill.

Other Built Features

The middle distant views are of 19th and 20th century terraces and larger villas above Beechen Cliff.

Etching by JR Cozens from present day Royal Victoria Park (view now obscured by Marlborough Buildings)



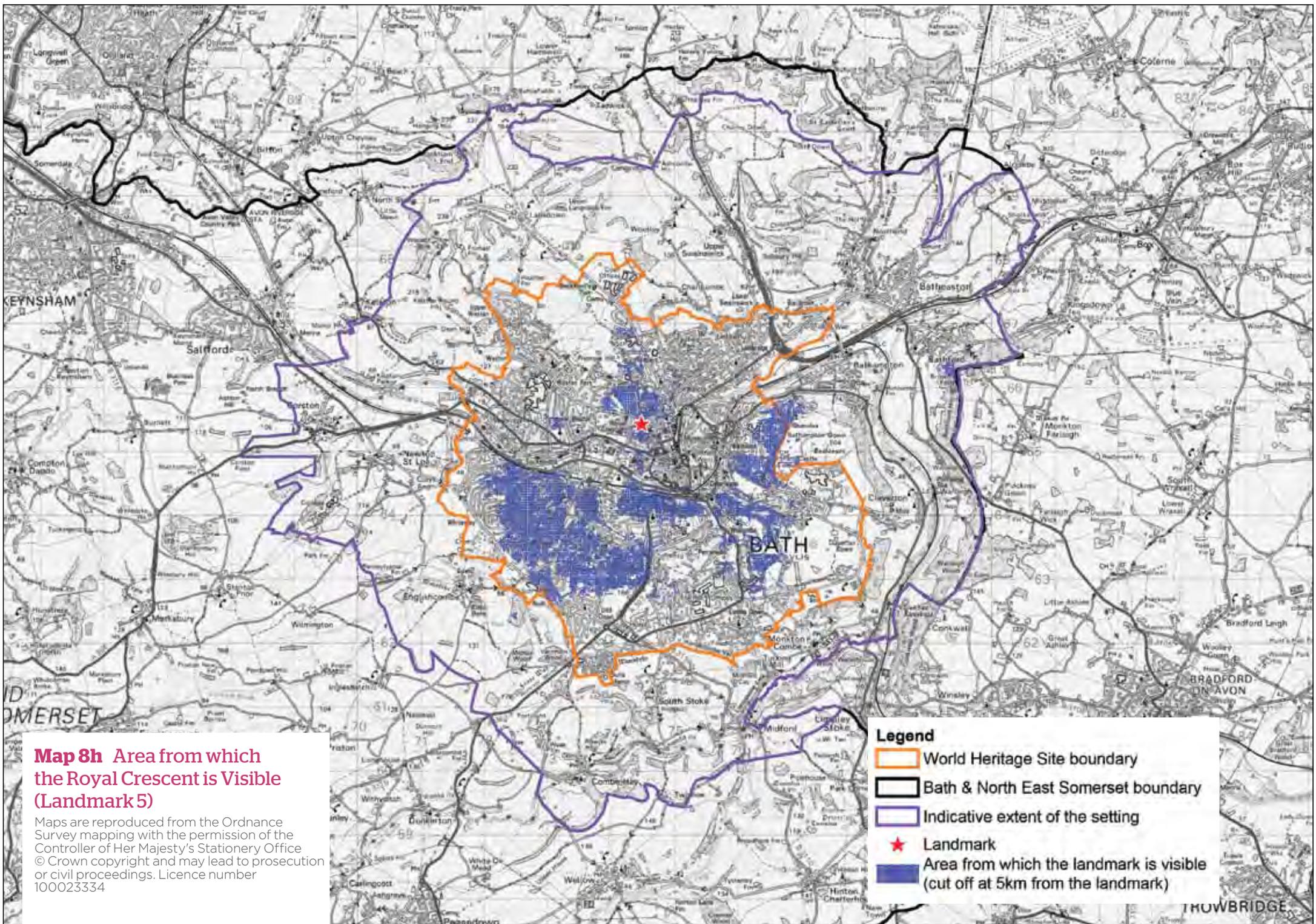


Map 8g Area Visible from the Viewpoint at the Royal Crescent (Viewpoint 5)

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Legend

- World Heritage Site boundary
- Bath & North East Somerset boundary
- Indicative extent of the setting
- ★ Viewpoint
- Area visible from the viewpoint (cut off at 5km from the viewpoint)



Map 8h Area from which the Royal Crescent is Visible (Landmark 5)

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Legend

-  World Heritage Site boundary
-  Bath & North East Somerset boundary
-  Indicative extent of the setting
-  Landmark
-  Area from which the landmark is visible (cut off at 5km from the landmark)

TROWBRIDGE

12a Alexandra Park Looking North

Significance of Viewpoint

This was an important viewing point during the Georgian period forming part of a series of routes referred to by John Wood and Jane Austen. A summer house was built at the top of Beechen Cliff in the 1750s as a useful viewing point which is thought to be the point where Catherine Morland commented on the landscape in Jane Austen's *Northanger Abbey*. The location is now marked by a park bench.

Description of View

Commanding views into and across Bath City centre and to undeveloped wooded and grassland slopes beyond framed by trees growing on Beechen Cliff below.

Historic Built Features

The lower Georgian town in the near distance including St. James's Parade, the Roman Baths, Bath Abbey, the Parades, the upper Georgian town beyond including Royal Avenue, Queen Square, the Circus, the Royal Crescent, Lansdown Crescent, the Paragon and around to Camden Crescent, Prospect Place and Great Pulteney Street.

Landscape and Topographical Features

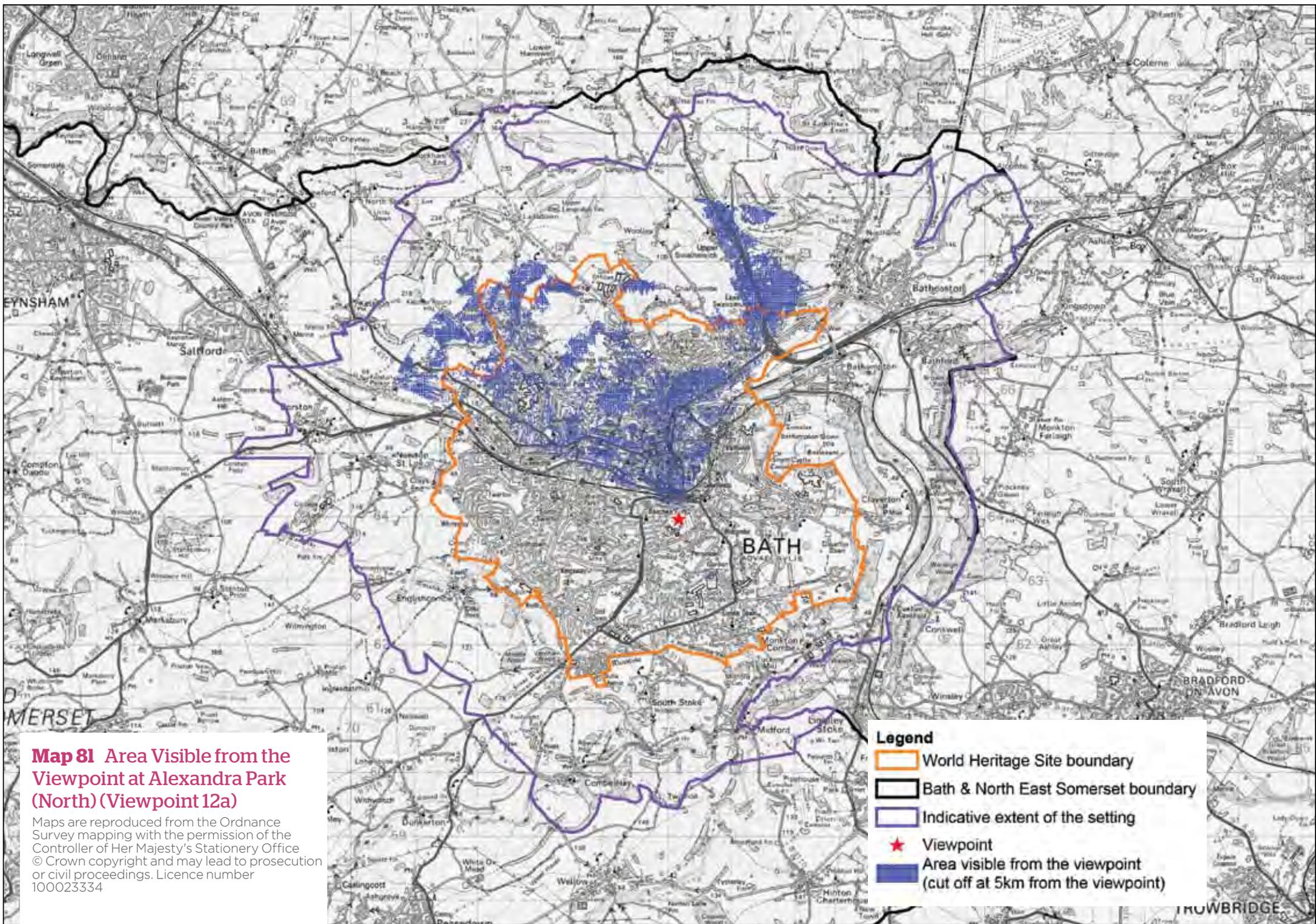
Steep wooded slopes of Beechen Cliff in foreground. Trees in near to middle distance at Royal Victoria Park, Queen Square and the Circus, Parade Gardens, Henrietta Park and Sydney Gardens and beside the River Avon and railway line. Open space at the recreation ground and cricket ground. Distant views to High Common, Beacon Hill woodland, hills above Charlcombe, Charmy Down, Little Solsbury Hill, Bannerdown and Bathampton Down slopes.

Other Built Features

Bath City College, Carpenter House, Kingsmead, the new Southgate development, the Empire Hotel, Berkeley House, Snowhill housing and the Dolemeads. In the foreground the Great Western railway built in 1840 lies along the Avon valley.

Historic illustration 1d Robins A Southwest Prospect of the city of Bath 1723





Map 81 Area Visible from the Viewpoint at Alexandra Park (North) (Viewpoint 12a)

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Legend

- World Heritage Site boundary
- Bath & North East Somerset boundary
- Indicative extent of the setting
- ★ Viewpoint
- Area visible from the viewpoint (cut off at 5km from the viewpoint)

12b Alexandra Park Looking East

Significance of Viewpoint

This was an important viewing point during the Georgian period forming part of a series of routes. This prospect became popular as Bath expanded with views to Bathwick Hill and Widcombe.

Description of View

Commanding view to and across Widcombe and to undeveloped wooded and grassland slopes beyond framed by trees around the edge of the park. Buildings are set within a well treed and verdant landscape.

Historic Built Features

Lyncombe Hill terraces, Prior Park Buildings, Crowe Hall. Widcombe Manor, St Thomas a Becket church and Macaulay Buildings

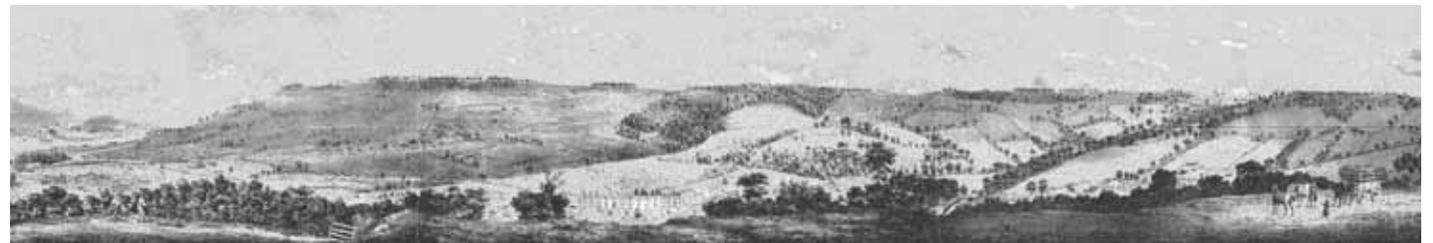
Landscape and Topographical Features

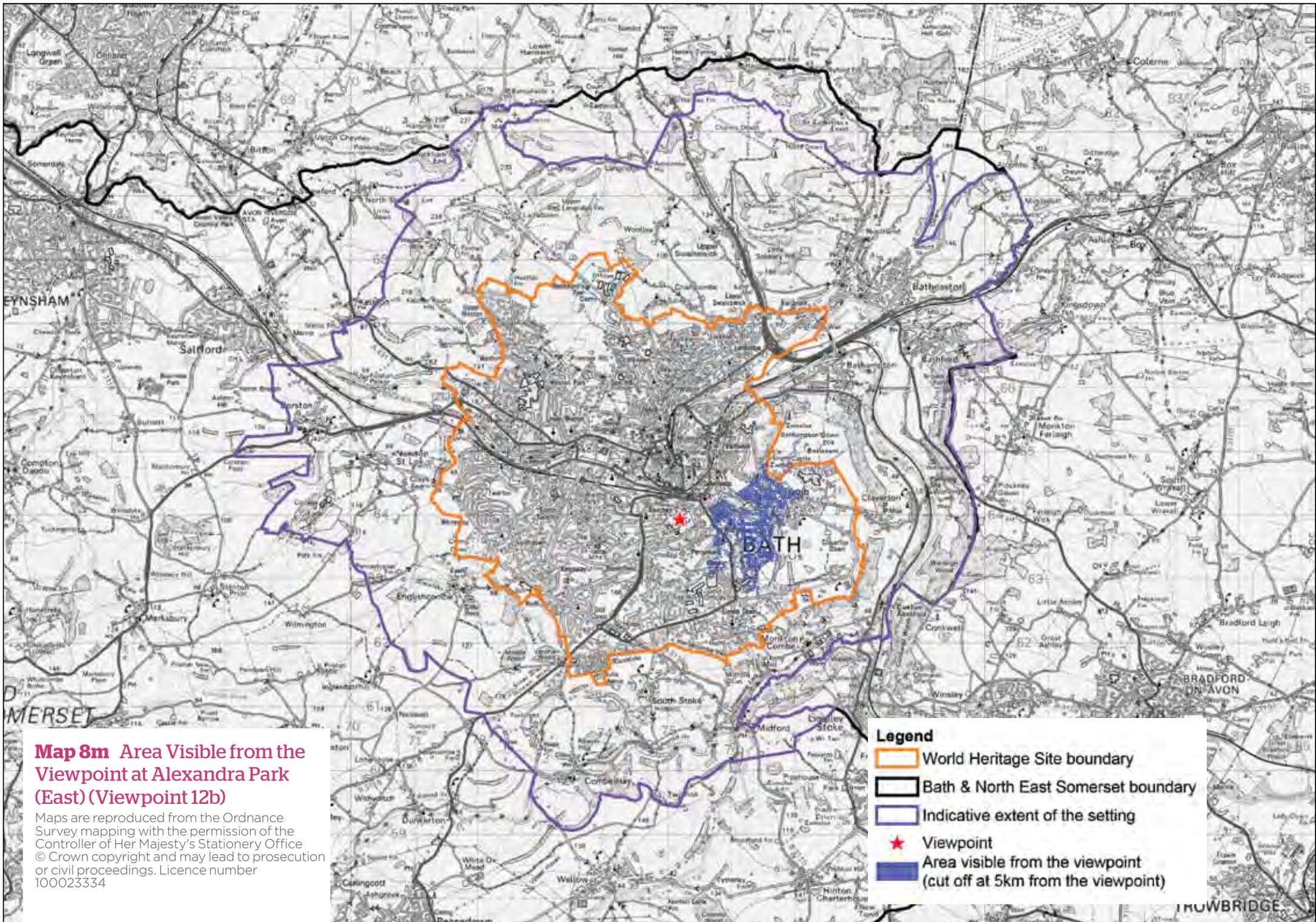
The eastern view includes the Lyn brook valley, Alexandra Park, allotments and small fields enclosed with trees and hedgerows in the near distance. Smallcombe Wood and Rainbow Woods form part of the wooded skyline with fields below.

Other Built Features

The view contains very little development later than 1837.

Excerpt from Panoramic View of Bath, Harvey Wood 1824





Map 8m Area Visible from the Viewpoint at Alexandra Park (East) (Viewpoint 12b)

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Legend

- World Heritage Site boundary
- Bath & North East Somerset boundary
- Indicative extent of the setting
- ★ Viewpoint
- Area visible from the viewpoint (cut off at 5km from the viewpoint)

12c Alexandra Park Looking South

Significance of Viewpoint

This viewing point was part of an important series of routes during the Georgian period which provided views across the open countryside. Views are now partly restricted by the building of Beechen Cliff School.

Description of View

The view point on the crest of the hill looks south towards woodland and fields. Beechen Cliff School buildings dominate the foreground.

Historic Built Features

Views towards Prior Park.

Landscape and Topographical Features

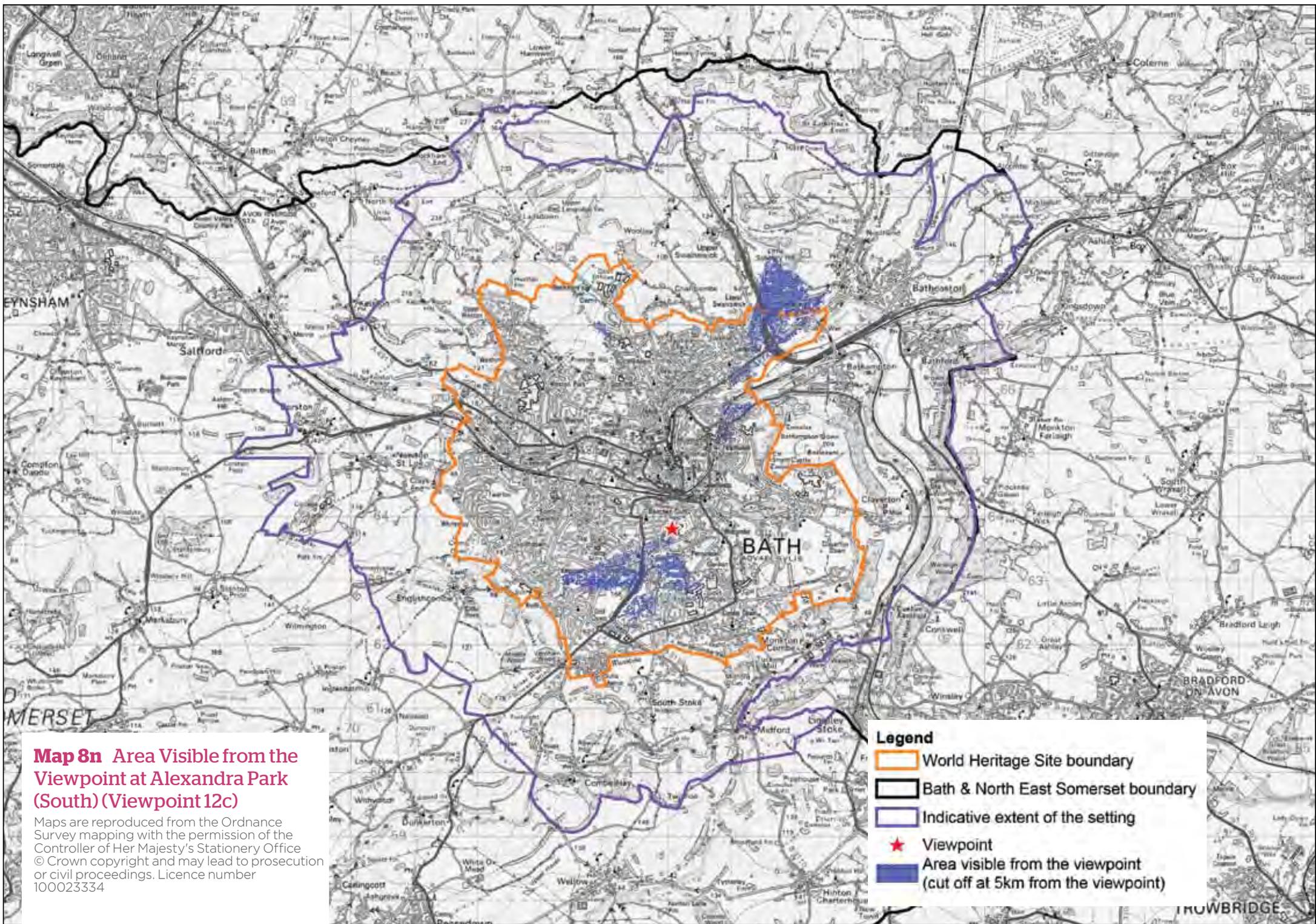
The view south of the crest of the hills to the south including Lyncombe Vale fields and the eastern edges of Foxhill.

Other Built Features

Near and mid distant views of Beechen Cliff School and post 19th century housing at Foxhill.

Excerpt from Panoramic View of Bath, Harvey Wood 1824





Map 8n Area Visible from the Viewpoint at Alexandra Park (South) (Viewpoint 12c)

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Legend

- World Heritage Site boundary
- Bath & North East Somerset boundary
- Indicative extent of the setting
- ★ Viewpoint
- Area visible from the viewpoint (cut off at 5km from the viewpoint)

12d Alexandra Park Looking West

Significance of Viewpoint

This viewing point was part of a series of important routes during the Georgian period. The view from Magdalen Gardens was particularly popular with illustrators in the 18th century and the surviving plaque erected in the 1920s is testament to the ongoing appreciation of this view.

Description of View

View down Shelley Road over Oldfield Park to Twerton and open countryside beyond. The built city blends into distant green hills and woodland along the Avon Valley.

Historic Built Features

Kelston Park can be clearly seen on the edge of the Cotswold Plateau in the distance above the Avon valley.

Landscape and Topographical Features

Ridge rising up to Whistling Copse beyond Newton Brook valley, hill on south side of River Avon valley with Seven Acre Wood on the crown, Carrs Wood on distinct area of rising ground at Twerton, Ashton Hill (west of Corston), and Kelston Park and the Cotswold scarp slope in the distance.

Other Built Features

19th century housing, terraces at Bear Flat and Oldfield Park in near distance and Twerton in the middle to far distance.

1845 Miss Brackstone's Establishment



13 Twerton Roundhill

Significance of Viewpoint

Twerton Roundhill is a strong topographical feature. It provides a popular public viewpoint on the south side of the city which shows the Georgian city in the context of the surrounding hills. Great Pulteney Street is thought to have been designed to line up with the hill seen from the Holburne Museum end.

Description of View

Panoramic 360 degree view including the Newton Brook valley and open undulating rural landscape to the south and west and over Bath looking north taking in the Bristol Channel and Wales in the far distance to the west and Claverton Down to the east.

Historic Built Features

Kelston Manor, Beckford's Tower, Cavendish Crescent, Somerset Place, Lansdown Crescent, Marlborough Buildings, Marlborough Street, Park Street, Park Place, Doric House, Royal Crescent, Brock Street, Nelson Place West, Norfolk Crescent, the Circus, Lansdown Road, and Lansdown

Grove Hotel, Great Pulteney Street and the Holburne Museum, the Abbey, the Roman Baths and Pump Room, St Michael's Church, Bathwick Hill, Darlington Place and Sydney Buildings.

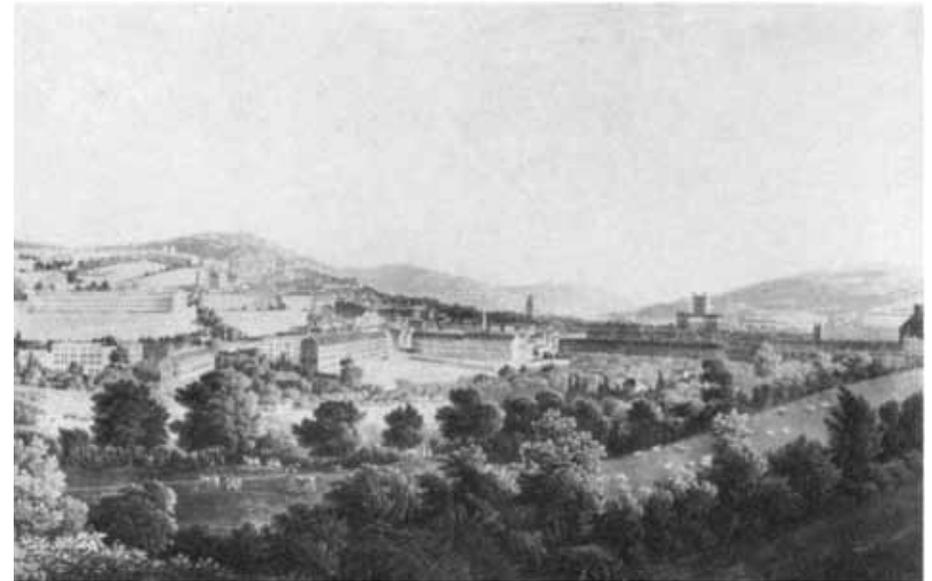
Landscape and Topographical Features

Near views of wooded slopes and ridge of Claverton Down, Brickfields, Stirlingale Farm, Rush Hill, Englishcombe village and views to the south. Middle distance views of Royal Victoria Park and allotments. Distant views of Kelston Roundhill, Prospect Stile, the Lansdown ridge, High Common (Approach Golf Course), Little Solsbury Hill and Bannerdown.

Other Built Features

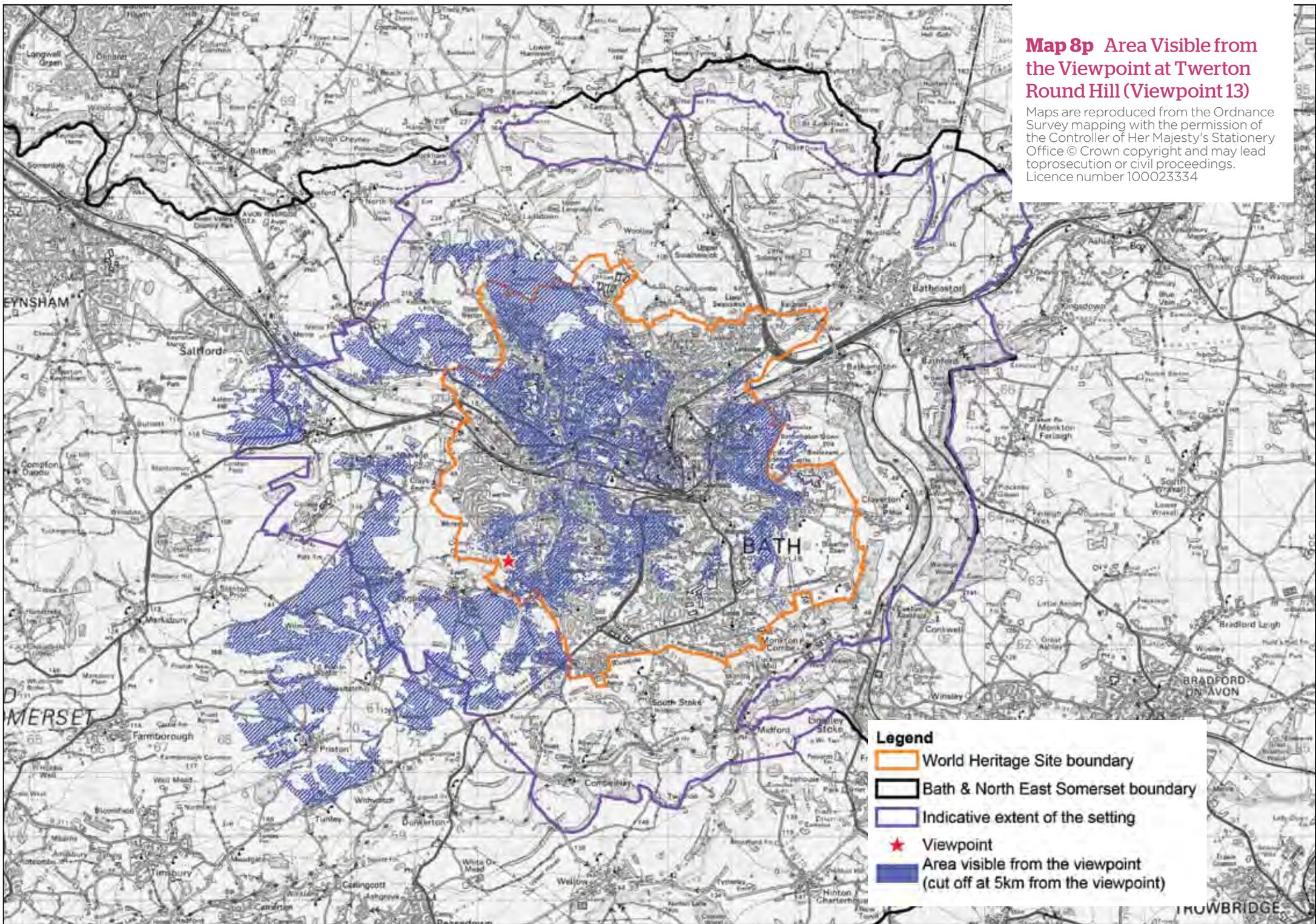
Post 19th century housing including Southdown Estate, Waterside Court student accommodation, Western Riverside, Kingswood School, St Stephen's Church, Balance Street flats, Bath City College, Empire Hotel, MOD offices on Warminster Road and modern housing at Rush Hill.

The City of Bath, T Clark 1826



Map 8p Area Visible from the Viewpoint at Twerton Round Hill (Viewpoint 13)

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Legend

- World Heritage Site boundary
- Bath & North East Somerset boundary
- Indicative extent of the setting
- Viewpoint
- Area visible from the viewpoint (cut off at 5km from the viewpoint)

15 Sham Castle

Significance of Viewpoint

Sham Castle was built in 1762 as an eye-catching folly to be seen from Ralph Allen's townhouse and was probably designed by Sanderson Miller. Bathampton Down itself was popular in the 18th and 19th century for its views and riding. Literary references to it include those by Spencer Cowper, William Pitt and Jane Austen. It was used for horse racing over a 2 mile course and later Ralph Allen made a carriage drive to show off the skyline views. This ran around the periphery of Bathampton Down and extended as far as Rush Hill.

Description of View

View framed by trees looking from the east of the city towards the west. The view takes in trees in the foreground, the proposed development site at Western Riverside in the middle distance and distant views of the countryside and hills.

Historic Built Features

Middle distance views of the Abbey, Johnstone Street, Pierrepoint Street, Bridge Street and the central Georgian core of the upper and lower town. Key buildings include Johnstone Street, the Circus, Gay Street, Lansdown Road (Belmont Row) and The Paragon.

Landscape and Topographical Features

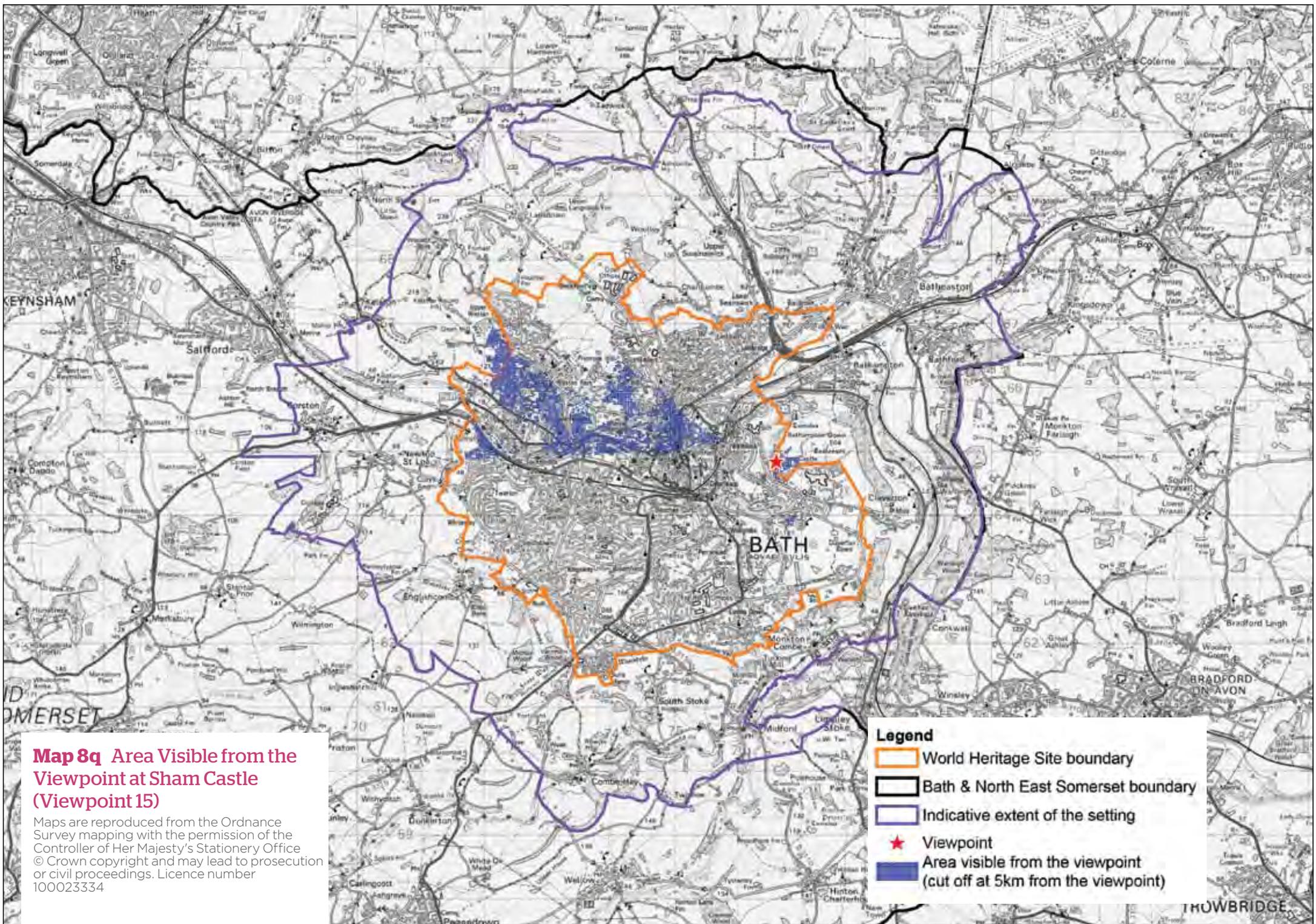
View of the city defined by the northern and southern surrounding hill slopes. Royal Victoria Park, river valley corridor towards Bristol, middle and distant views of open countryside and hills.

Other Built Features

The recreation ground, the North Parade leisure centre, the Empire Hotel, Thermae Bath Spa, Western Riverside gas holders, St. Michael's Church and Twerton.

WH Bartlett 1841



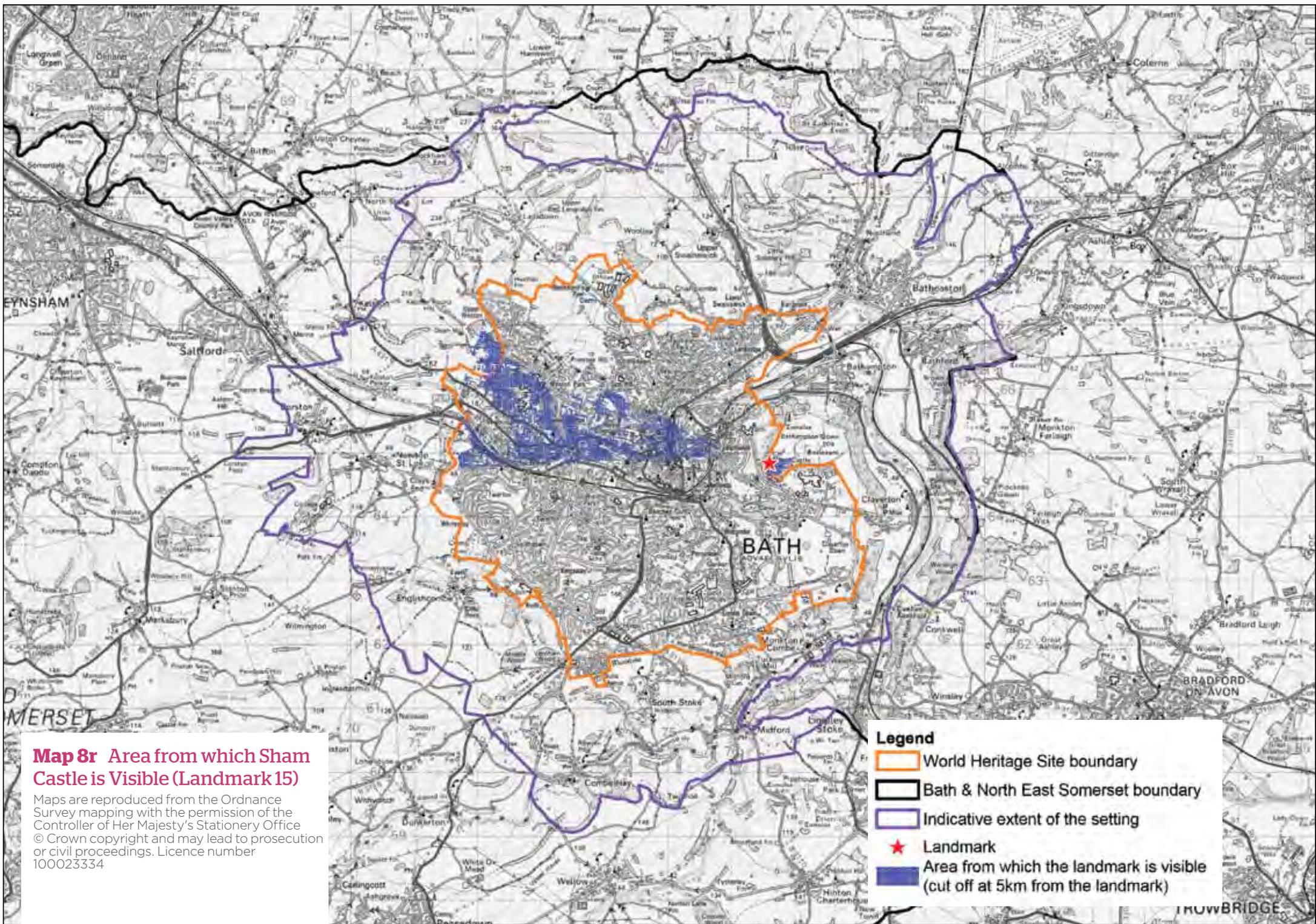


Map 8q Area Visible from the Viewpoint at Sham Castle (Viewpoint 15)

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Legend

- World Heritage Site boundary
- Bath & North East Somerset boundary
- Indicative extent of the setting
- ★ Viewpoint
- Area visible from the viewpoint (cut off at 5km from the viewpoint)



Map 8r Area from which Sham Castle is Visible (Landmark 15)

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Legend

- World Heritage Site boundary
- Bath & North East Somerset boundary
- Indicative extent of the setting
- ★ Landmark
- Area from which the landmark is visible (cut off at 5km from the landmark)

16 Widcombe Hill

Significance of Viewpoint

In the 18th century Widcombe Hill provided, and still does today, some of the best panoramic views to the west and north of the city seen from the east. Georgian buildings are seen in the context of the surrounding hills and the green River Avon valley.

Description of View

View of the Georgian city within the hollow of the surrounding hills with distant views west along the River Avon valley.

Historic Built Features

Distant view of Kelston Park and Beckford's Tower. The Georgian city including The Circus, the Royal Crescent, Lansdown Crescent, Camden Crescent and the Abbey.

Landscape and Topographical Features

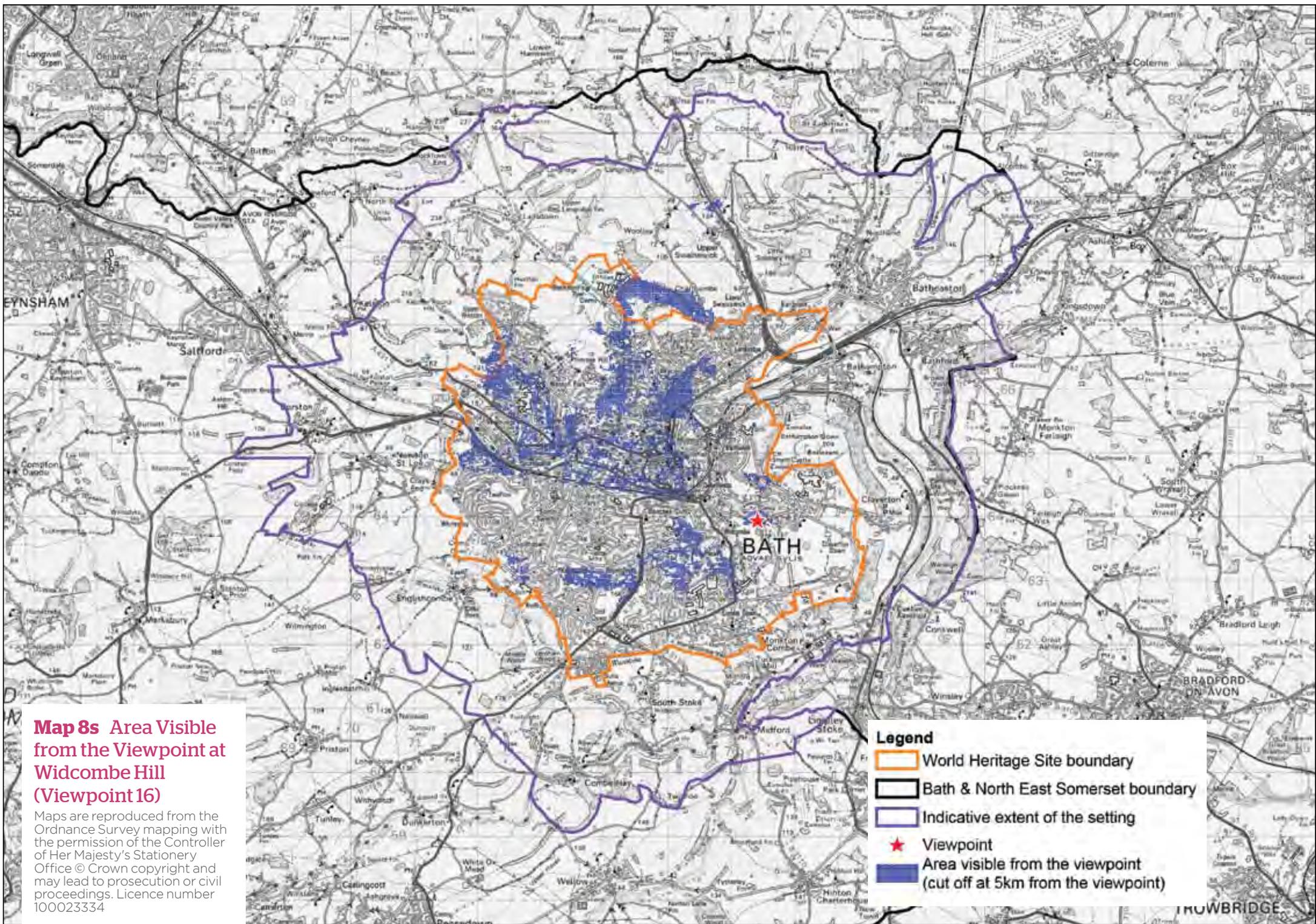
Near views of Perrymead, the lower slopes of Widcombe and the Lyncombe Vale terraces, Abbey cemetery, Alexandra Park and allotments and Beechen Cliff woodland. Middle distance views of the Approach Golf Course, the route of the Cotswold Way, trees in The Circus, woodland areas below Lansdown Crescent, Royal Victoria Park and Locksbrook cemetery. Distant view to the north and west of the city in a hollow, along the Lansdown ridge including Kelston Round Hill and hills above Corston and very distant views of ridges west of Bristol.

Other Built Features

Near view of St Matthew's Church (Widcombe), Churchill Bridge with the riverside warehouses, Kingsmead housing, Western Riverside and gas holders and post 19th century housing to the west of city. Snow Hill housing and terraces below Beacon Hill in the middle distance.

J Parker 1792



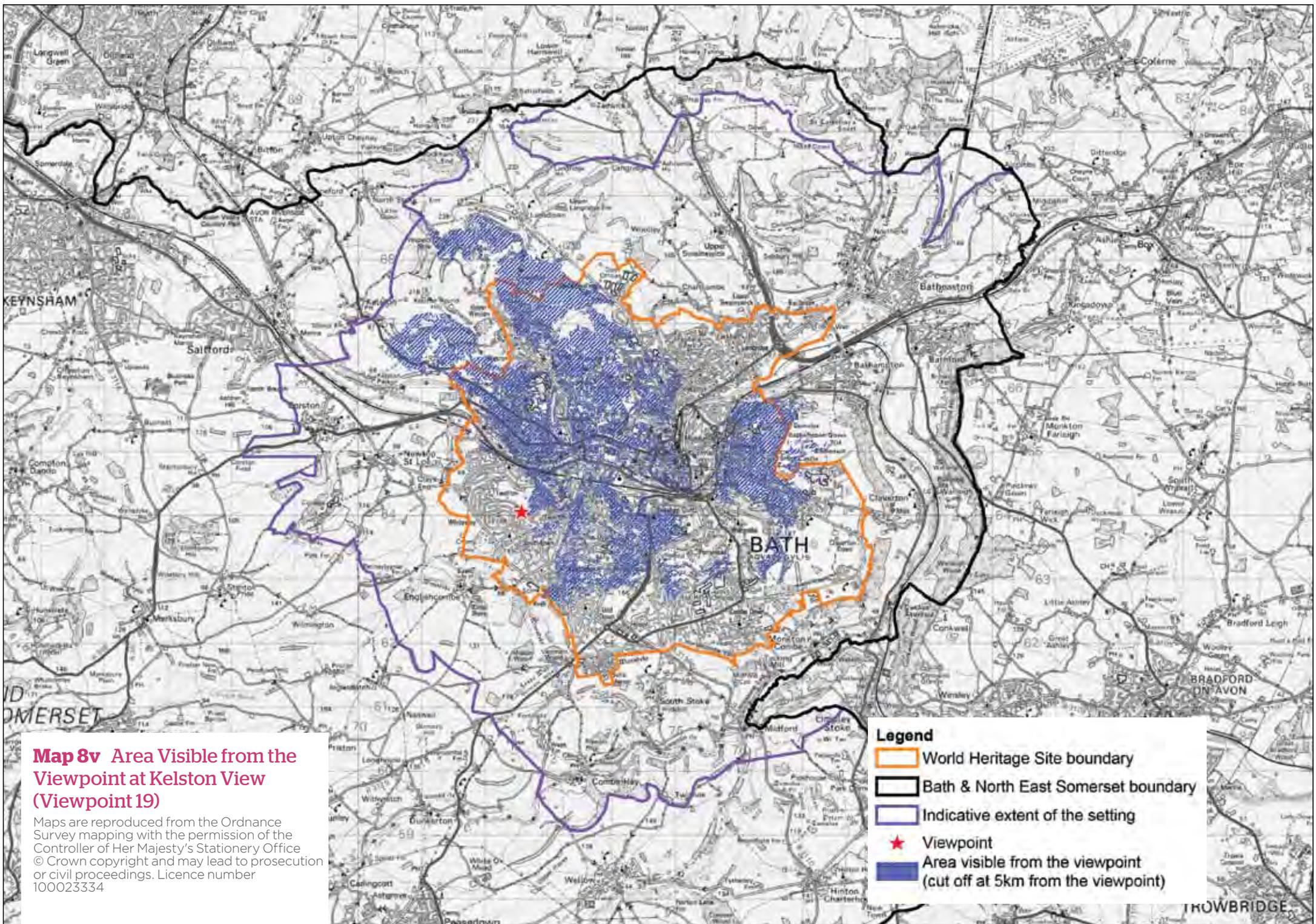


Map 8s Area Visible from the Viewpoint at Widcombe Hill (Viewpoint 16)

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Legend

- World Heritage Site boundary
- Bath & North East Somerset boundary
- Indicative extent of the setting
- ★ Viewpoint
- Area visible from the viewpoint (cut off at 5km from the viewpoint)



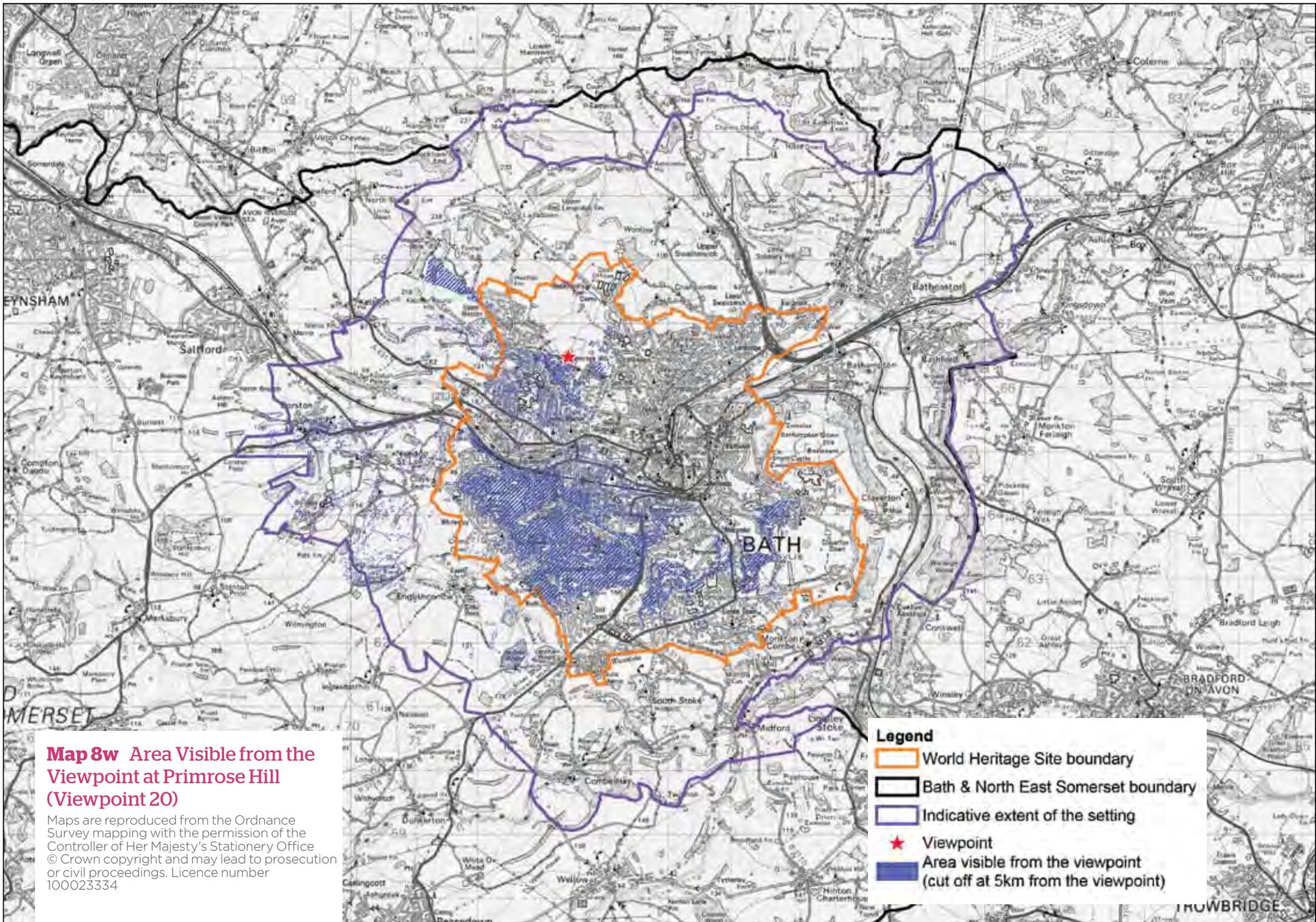
Map 8v Area Visible from the Viewpoint at Kelston View (Viewpoint 19)

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Legend

-  World Heritage Site boundary
-  Bath & North East Somerset boundary
-  Indicative extent of the setting
-  Viewpoint
-  Area visible from the viewpoint (cut off at 5km from the viewpoint)

TROWBRIDGE



Map 8w Area Visible from the Viewpoint at Primrose Hill (Viewpoint 20)

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Legend

- World Heritage Site boundary
- Bath & North East Somerset boundary
- Indicative extent of the setting
- ★ Viewpoint
- Area visible from the viewpoint (cut off at 5km from the viewpoint)

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ECONOMICS



HERITAGE

Pegasus Group
Pegasus House
Querns Business Centre
Whitworth Road
Cirencester
Glos
GL7 1RT

Telephone: 01285 641717

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